

CAUSE NUMBER: CL-19-4410-D

LAW OFFICE OF CHRIS SANCHEZ P.C. <i>Plaintiff,</i>	§	IN THE COUNTY COURT
	§	
	§	
vs.	§	AT LAW NO. _____
	§	
TREVOR NIKOS KOCAOGLAN And PABLO TREJO <i>Defendants.</i>	§	
	§	
	§	HIDALGO COUNTY, TEXAS

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**PLAINTIFF' S ORIGINAL PETITION**

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**TO THE HONORABLE JUDGE OF SAID COURT:**

NOW COMES LAW OFFICE OF CHRIS SANCHEZ, P.C., hereinafter called Plaintiff, complaining of and about TREVOR NIKOS KOCAOGLAN and PABLO TREJO, hereinafter called Defendants, and for cause of action shows unto the Court the following:

**I.**

**DISCOVERY PLAN LEVEL 1**

1.1 Plaintiff requests that this lawsuit be governed by a Level 2 Discovery Control Plan pursuant to the Texas Rules of Civil Procedure.

**II.**

**PARTIES**

2.2 Plaintiff is LAW OFFICE OF CHRIS SANCHEZ P.C., a Texas professional corporation organized under the Texas Secretary of State under the Texas Business Organizations Code law of the state of Texas.

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2.3 Defendant TREVOR NIKOS KOCAOGLAN is a resident of Hidalgo County, Texas and the defendant may be personally served at 201 Reeve, Combes, Texas 78535. Service is requested by private process server.

2.4 Defendant PABLO TREJO is a resident of Hidalgo County, Texas and the defendant may be personal served at his place of employment, LIFE STAR EMS located at 1105 W. Orange Avenue, Edinburg, Texas 78541. Service is requested by a private process server.

**III.**

**JURISDICTION AND VENUE**

3.1. This Court has jurisdiction over this case and the damages sought are within the jurisdictional limits of this Court. Venue is proper in Hidalgo County, Texas pursuant to Section 15.002 of the State of Texas because all or a substantial part of the events giving rise to this cause of action occurred there, and it is where the contract was entered into and performed. Plaintiff seeks damages of \$250,000.00 against the defendants.

**IV.**

**FACTUAL BACKGROUND**

4.1. On or about August 18, 2019, Defendant TREVOR NIKOS KOCAOGLAN made a defamatory statement on the google review page of LAW OFFICE OF

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CHRIS SANCHEZ PC, none of which is true, because KOCAOGLAN is simply unhappy that the law firm withdrew from representing him on a property damage case involving his jaguar. It is as if the Defendant wanted to blame the law firm as his scape goat for his own mistake for not adequately insuring his own vehicle, which is what KOCAOGLAN probably should have done prior to the incident occurring. The law firm had previously given KOCAOGLAN written notice of the withdrawal of representation via email, certified mail, and regular USPS mail.

**V.**

**CAUSE OF ACTION**

**Count 1—DEFAMATION –LIBEL**

5.1 On or about August 12<sup>th</sup>, 2019, DEFENDANT KOCAOGLAN overreacted very immaturely by first threatening, yelling and screaming obscenities at the Attorney over the telephone, stating that he was going to shoot him, to which the Attorney moved swiftly to block him from social media website Facebook.com. The next move the Defendant KOCAOGLAN made was that he went to LAW OFFICE OF CHRIS SANCHEZ PC's entity Facebook page and wrote a defamatory statement left as a review, and his buddy PABLO TREJO who also works with KOCAOGLAN, also leave a defamatory statement, both of which had the intent to harm the law firm economically, by discouraging future clientele from contracting with the law firm for legal services. It should be noted that DEFENDANT TREJO

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has never been a client of the law firm, and he was simply flat out lying on his review with the malicious intent to harm the business of the PLAINTIFF in this suit, KOCAOGLAN, on the other hand, never voiced a single complaint prior to the withdrawal of the law firm, in fact he wanted the law firm to continue to represent him because he was satisfied with the services provided.

5.2 It did not stop there. The next move KOCAOGLAN made was that he bombed the law firm's email inbox with approximately 50 "phishing" emails, which are used by hackers to try to obtain access to the account. At that point, the attorney on behalf of the law firm, filed a criminal complaint for harassment against Defendant KOCAOGLAN with McAllen Police Department. It is an ongoing investigation at this point in time.

5.3 Then on or about August 13<sup>th</sup>, 2019, KOCAOGLAN called the law firm and began his antics once again by yelling and screaming at the attorney over the phone, after the attorney informed him that he did in fact file a criminal complaint for harassment against him. KOCAOGLAN had previously demanded his client file and promptly showed up to the firm at some time subsequent to his phone call, asking LAURA SANTOY, the legal assistant where the attorney was. He would not stop making disparaging remarks and saying outlandish things to Ms. SANTOY

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about the attorney, and even going as far as telling her that he was going to make the attorney a public school teacher again. In effect, he was using the employee to continue his harassment of Christopher Ray Sanchez again.

5.4 Next, Defendant KOCAOGLAN was given written notice that via email, certified mail, and regular U.S. mail, on that same day, that he was no longer allowed to step foot anywhere on the premises, the commercial real property located on south 23<sup>rd</sup> street where the law office is located. He fired back an email, and then defiantly showed back up in his maroon sedan, the whole incident captured by the law firm's cameras, of him committing a criminal trespass in Hidalgo County, Texas. Once the attorney and the legal assistant recognized that a crime was being committed at that moment ,against the laws of the state of Texas, the attorney immediately filed a criminal complaint with law enforcement, namely McAllen Police Department, and the attorney is now pressing charges, and the officer that arrived on the scene, Officer R. Gonzalez #12204, also stated that McAllen Police Department would be pressing charges since the evidence clearly rises to the level of probable cause that a crime has been committed by TREVOR NIKOS KOCAOGLAN.

5.5 Defendant has now been attacking the law firm's google reviews page, and just today, has made defamatory statements in the form of reviews as "Trevor,"

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“debate mell,” and “Raul Espinoza.” His actions clearly fit the legal definition of “libel” which is defined by statute as “defamation expressed in written or other graphic form that tends to blacken the memory of the dead or that tends to injure a living person’s reputation and thereby expose the person to public hatred, contempt or ridicule, or financial injury or to impeach a person’s honesty, integrity, virtue, or reputation or to public the natural defects of anyone and thereby expose the person to public hatred, ridicule, or financial injury.” Tex. Civ. Prac. & Rem. Code §73.001.

5.6 Due to this violation of law, Plaintiff LAW OFFICE OF CHRIS SANCHEZ P.C. is seeking its actual damages, economic damages, lost profits, attorney fees, court costs, post/pre judgment interest, and any and all other relief in equity and at law, to which it may be entitled to against Defendants PABLO TREJO and TREVOR NIKOS KOCAOGLAN.

## **VI.**

### **REQUEST FOR DISCLOSURES**

6.1 Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Plaintiff requests that Defendants disclose the information and material described in Rule 194.2 within fifty (50) days of the service of this Plaintiff's Requests for Disclosure to Defendants.

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**VII.**

**TEX. R. CIV. P. 193.7 NOTICE**

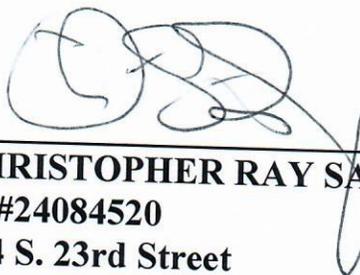
7.1 All documents produced by either Defendant are authenticated for purposes of Rule 193.7 and will be used by the Plaintiffs at trial or hearings.

**VIII.**

**PRAYER**

8.1 Plaintiff LAW OFFICE OF CHRIS SANCHEZ P.C. prays for all equitable relief mentioned above, and all other relief in equity and in law to which they may be entitled to.

**Respectfully Submitted,**



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