



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

### Consumer's Information Summary

<b>Individual/Business</b>	Individual	<b>Address 1</b>	26714 Valleyside Drive
<b>First Name</b>	Reinaldo	<b>Address 2</b>	
<b>Middle Name</b>	Javier	<b>City</b>	Katy
<b>Last Name</b>	Aguiar Marcano	<b>County</b>	Fort Bend
<b>Age</b>	40-49	<b>State</b>	TX
<b>Doing Business As</b>	www.keyopinionleaders.com	<b>Zip/Postal Code</b>	77494
		<b>Country</b>	United States
<b>Primary Phone</b>	(469) 701-0227		
<b>Extension</b>			
<b>Secondary Phone</b>			
<b>Extension</b>			
<b>Email</b>	<a href="mailto:reinaldo@keyopinionleaders.com">reinaldo@keyopinionleaders.com</a>		

### Business'/Individual's Information Summary

<b>Business/Individual</b>	Individual	<b>Address 1</b>	2227 Braer Ridge DR
<b>First Name</b>	Phillip	<b>Address 2</b>	
<b>Middle Name</b>	E	<b>City</b>	Katy
<b>Last Name</b>	Denning	<b>County</b>	Fort Bend
		<b>State</b>	TX
<b>Phone</b>		<b>Zip/Postal Code</b>	77494
<b>Extension</b>		<b>Country</b>	United States
<b>Website</b>			
<b>Email</b>			



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

### Complaint Summary

<b>Name of person you dealt with</b>	Mr. Phillip E. Denning
<b>How did you first come into contact with this business or individual?</b>	I received a telephone call from the business
<b>If other, please specify.</b>	I had never met Mr. Denning. He called me to a phone number that I did not provide him or the HOA with.

<b>If you responded to a solicitation in another language, which?</b>	
---	--

<b>Where did the transaction take place</b>	Over the computer
<b>If other, please specify</b>	

<b>Transaction Date</b>	
	<p>Complaint for Racial Discrimination and Targeting application of HOA Rules by the President of the Home Owners Association of Lake Pointe Estates and Resident of the same Sub-division: Mr. Phillip E. Denning</p> <p>Dear Sir or Madame,</p> <p>I would like respectfully submit this complaint to your office. My complaint is the following:</p> <p>1. Discrimination: On 08/19/2024 The President of the Home Owners Association of Lake Pointe Estates in Katy, Texas, a person by the name of Mr. Phillip E. Denning, who is also a resident in the Subdivision, made derogative statements to me, in writing, via email about my Nationality / Country of Origin. In an email in which Mr. Denning berated me, he specifically wrote (and I am quoting): "LPE is not Venezuela" (LPE is the abbreviation of the name of the Subdivision "Lake Pointe Estates"). To me this comment is highly offensive and discriminatory, and has no place in a business email. It implies my origins are of a lesser value as of the other residents of the community, solely based on my country of birth. This is the text-book definition of racial discrimination.</p> <p>2. Offensive and derogatory communications: Mr. Denning wrote in an email addressed to me that he "Still can't figure out why you moved into LPE.". To me this comment is offensive, derogatory and it implies that: a) I have no place in this community, and b) that I have to somehow, or for some reason, justify to Mr. Denning why I made the decision to purchase the house and make it my home. I have never been this offended in my entire life. I feel Mr. Denning is trying to push me out of the community and out of my home, although I can't see any reason for this other</p>



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

that I am Latino/Hispanic (I base this statement on Mr. Denning' comment about my Country of Origin).

3. Targeted application of HOA Rules with Unreasonable rigor: I have documented many examples where Mr. Denning interprets the rules of the HOA in a way that is always against my interests, but then, Mr. Denning interprets the same rules differently (and favorably) for other residents. It has gotten to the point where he "forbid me from driving my vehicle" on a segment of about 6 feet over my own lawn (apparently this HOA has the powers to regulate motor vehicle traffic on Private Property).

In another instance, Mr. Denning berated me and trespassed the Land of my Private Property while screaming at me "I TOLD YOU TO NOT PARK ON THE LAWN!!!!". When this happened I didn't even know who he was as we had never met face to face. (but somehow he knew who I was). Supposedly, the reason why Mr. Denning did this was because one (1) out of the four tires of my vehicle was partially resting on top of my own lawn in a space of approximately 9 square inches (I can produce the video recording of the incident with audio and view of the tire partially resting on the lawn). Coincidentally, at the exact moment of this incident, the neighbor of the house next door 2310 Britton Ridge Dr. had a car parked on their driveway with a tire resting on their lawn too which is visible in the recording I have and visible to Mr. Denning at that moment too. Mr. Denning verbally attacked me and left but did not knock on the neighbor's door or attacked them. Only me. This was targeted.

On a separate incident Mr. Denning "forbid me" to put a (discrete) "Private Property – No Trespassing" 10 inch x 10 inch sign within my Private Property lines and ordered me to take down the one I had because (according to Mr. Denning) "it is inappropriate".

On 08/19/2024, Mr. Denning sent me a strongly worded email complaining about me driving my car (for a couple of seconds) on top of my own lawn and "forbidding me" to do it again.

On 08/20/2024 (the next day), an unknown woman Trespassed the land of my property and attacked my wife because my wife drove over of our own lawn for about 6 feet (the same issue Mr. Denning had complained in his email 14 hours before). The woman that Trespassed and attacked my wife stroke/beat the doors and windows of our house very violently using two sticks about 4 feet long (each stick) while screaming at my wife "I saw you drove over the lawn, I saw what you did, Open the door, I know you are in there, I am witness!!!!". The woman damaged the door. We filed an incident report with the Fort-bend Sherif Office for Trespass and provided the Police with the footage of the



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

**Please describe your complaint in detail**

security cameras. The case number is #24-34345. The officer that took the report was Deputy J. Alvarado #4129. I can not be sure if this incident / this woman are connected to Mr. Denning (I do not know the identity of the woman). But the timing of this and the theme of the incident (us driving over our own lawn) short 14 hours after receiving Mr. Denning email of 08/19, is concerning.

4. There don't seem to be any checks and balances. The management company and the other Board members are silent in all these incidents: For some reason that is beyond my comprehension, Mr. Denning seems to concentrate all roles and powers of the HOA. Mr. Denning patrols the front of my house (personally) practically every day, some days he does it two times per day (morning and evening). Mr. Denning also interprets the HOA rules, imposes penalties, judges my character, speculates about my thoughts and the motivations behind my actions, often he writes emails narrating incidents that simply never happened or narrates them in a completely distorted way (it feels as he is writing these emails to be used by a lawyer in the future, not sure what lawyer or for what purpose but that's what this feels like). Mr. Denning takes on all these roles and initiatives all by himself and nobody else from the Board of Directors or the Management company ever intervenes.

During the few weeks I have been living in this community, the only person I have heard from in a writing communication addressed solely to me, or communicated with in any way is Mr. Denning.

Mr. Denning specifically instructed me in his first email to me to direct all my communications directly to him and only to him.

I have owned over the years multiple properties in different countries (including the US), and in my experience all these roles have always been the role of the Management company or at least shared among multiple entities, but for some reason, Mr. Denning takes on all these roles alone and there don't seem to be any check and balances. The management company is CC'd in some of these communications, other Board members are CC'd in some of them, but for some reason they never reply or say a word. The only voice is always Mr. Denning'.

5. Excessive personal supervision by Mr. Denning possibly amounting to Harasment: Mr. Denning daily patrols the front of my house, most days he does it twice a day, looking for "Violations". He doesn't seem to do the same with other residents. I say this because in some instances I have pointed out equivalent "violations" from other houses (without telling Mr. Denning which houses specifically I am referring to, but I describe the "violations" in detail) and he always



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

asks me to provide him with the addresses I am referring to. Logic dictates that If he “patrolled” the other houses with the same level of “enthusiasm” as he patrols my house, he would have noticed the “violations” as they were equally (or more) visible from the street and wouldn’t have had a need to ask me for the addresses. This makes it obvious to me that his efforts are targeted and (based on the points #1 and #2 above) are probably racially motivated .

6. Deliberate Non compliance with instructions given to the HOA: Mr. Denning made several remarks over email saying that the “security guards are not a concierge service and cannot accept any packages”. I didn’t really understood the comment because we do not receive any packages at this address for company policy. I mentioned to Mr. Denning in more than one occasion that we do not accept any packages at this address because we/our company do not wish USPS/UPS/Fedex/Amazon Drivers to cross the property lines. We receive all our packages at an alternative address to prevent any intrusions to the Private Property. Three days after the last time we said this to Mr. Denning, he sent a package to our home via UPS that required signature. Because the package required signature the driver had to cross the Private Property lines. We see this as no more than a provocation from Mr. Denning given the long history of targeting and discrimination that Mr. Denning has displayed towards us in the few short weeks we have been living here. After this happened, on 08/22 I sent the HOA and Mr. Denning a request to update our mailing address to an alternate address and to not mail any more packages to 2302 Britton Ridge Drive in hopes that Mr. Denning complies with the request. I also requested that he addresses all communications to the owner of the property (the LLC) and not me personally. I do not wish to be subject to more discriminatory remarks from Mr. Denning.

7. Data Privacy practices of the HOA and/or their Officers and Partners: My other concern is about Data Privacy and Data Practices.

Specifically, Mr. Denning called me several times on my cellphone 650-479-6157. He then wrote to me an email with a very aggressive tone. In that email, Mr. Denning complained for me not answering his phone calls and he specifically wrote in the email that he called me on the phone number 650-479-6157.

The concerning part of all this is that I never gave that phone number to the Home Owners Association or Mr. Denning. I did not include this phone number it in any forms related to the Real Estate purchase. It is a mystery to me how is that Mr. Denning obtained that phone number. And it is a concerning mystery because I specifically and intentionally made sure to not include this phone number in any forms related to the purchase of this house or the HOA. The house



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

was purchased by an LLC precisely for this reason, to preserve my privacy. I wouldn't make the mistake of putting all that money and effort (to purchase the home with the LLC) to then write down my personal number in a form. I still can't comprehend how Mr. Denning obtained my phone number.

Me being an immigrant from Venezuela, which is a country that has been decayed by corruption and money laundering among other social problems, I am a firm believer that every organization and the individuals that operate them, require check and balances. Absolute power always corrodes and corrupts.

I beg you to please open an investigation into the operations of the Home Owners Association of Lake Pointe Estates and the management company (that Mr. Denning also recently announced that was replaced) and how Mr. Denning operates as President of this Home Owners Association and takes on the roles and responsibilities that would normally be those of a Management company.

Sincerely,

Reinaldo Aguiar  
Inventor, President and CEO of  
[www.KeyOpinionLeaders.com](http://www.KeyOpinionLeaders.com) (Operating LLC is Haaretz Hamuvtakhat Corp which is also the owner of the property 2302 Britton Ridge Drive, Katy TX 77494 located within the subdivision Lake Pointe Estates)

For context: I am an immigrant from Venezuela. Although I come from humble origins, and still am a very humble person, I have had the luck to have what some people might consider "a successful career" in Technology (I worked for Google, Yahoo, Goldman Sachs, Twitter) and my work has been featured in prominent US media outlets like Business Insider, USA Today, The Rolling Stones Magazine, among others. I am also named as the Sole Inventor in two (2) Google-owned Patents. I am also a co-founder of a Health-tech startup called [www.KeyOpinionLeaders.com](http://www.KeyOpinionLeaders.com) that competes in the Health-tech market with DefinitiveHealthcare and WebMD (both Medscape companies), and on the Online space with Liana Technologies and The Cleveland Clinic. Around June 27th 2024 I purchased a house in a gated community called Lake Pointe Estates (abbreviated LPE), which is a very small gated community/sub-division in Katy Texas 77494. The house address is 2302 Britton Ridge Drive, Katy Texas 77494. I purchased this house under our LLC to preserve my privacy and made this house my primary residence and home office from where I run the company Key Opinion Leaders and operate the website [www.keyopinionleaders.com](http://www.keyopinionleaders.com) (KOL for short).



**KEN PAXTON**  
ATTORNEY GENERAL OF TEXAS

	<p>=====</p> <p>Please find below one of the email exchanges with Mr. Denning:</p> <p>===== ATTACHMENT STARTS =====</p>
--	---

<b>Have you complained to the business or individual?</b>	Yes
<b>If Yes, when?</b>	8/12/2024
<b>What was the business' or the individual's response?</b>	"Let me say from the onset that the Board and management company ensure that we treat all residents equally. We have no favorites, practice no discrimination or targeted applications."

<b>Did you sign a contract?</b>	Yes
<b>How much did the company/individual originally ask you to pay?</b>	\$550.00
<b>How much did you actually pay?</b>	\$550.00
<b>Method of Payment</b>	CREDIT
<b>Date of Payment</b>	8/1/2024

<b>Have you contacted another agency or attorney about this complaint?</b>	No
<b>If yes, please list name and address of the agency or attorney?</b>	
<b>What action was taken by this agency or attorney?</b>	