

D-1-GN-23-002920

CAUSE NO. _____

ANDREA SKOLA
Plaintiff,

§
§
§
§
§
§
§

IN THE DISTRICT COURT

V.

TRAVIS COUNTY, TEXAS

LEANN MARIE HILTON
Defendant.

250TH, DISTRICT COURT

_____ JUDICIAL DISTRICT

**PLAINTIFF'S ORIGINAL PETITION AND
REQUEST FOR PERMANENT INJUNCTIVE RELIEF**

Plaintiff Andrea Skola (“Andrea” or “Ms. Skola”) files this Original Petition complaining of the actions of Defendant LeAnn Marie Hilton, (“Defendant”), and in support thereof, would show the Court the following:

**I.
DISCOVERY AND MONETARY RELIEF SOUGHT**

1. Discovery shall be conducted under Level 2. Pursuant to TEX. R. CIV. P. 47(c), Plaintiff states that she seeks monetary relief more than \$250,000 but less than \$1,000,000, and non-monetary relief.

**II.
PARTIES**

2. Plaintiff Andrea Skola is an individual residing in Travis County, Texas.
3. Defendant LeAnn Marie Hilton is an individual residing in Travis County, Texas.
Defendant may be served with process and citation at her address of 6804 Gabion Drive, Austin, Texas 78749 or any other address at which she may be located.

**III.
JURISDICTION AND VENUE**

4. The Court has jurisdiction over this matter as this is an action for damages in excess of the minimum jurisdictional limits of the Court. Venue is proper in Travis County, Texas pursuant to Texas Civil Practice and Remedies Code, Chapter 15, because all or a substantial part of the events or omissions giving rise to the claim occurred in Travis County, Texas.

IV.
FACTS COMMON TO ALL COUNTS

A. Who is Andrea Skola?

5. Andrea is a mother to two young children and married her husband, Benjamin Summers, twelve years ago. They met back in 2007, fell in love, married, and had two wonderful children. Both Andrea and Benjamin¹ dedicated their careers to the education system. Andrea went even further and works with some of the hardest young ones, those with special educational needs.

6. Andrea graduated from high school in Camdenton, Missouri in 1999. From there, she proceeded to obtain her undergraduate degree at Saint Edwards University, right here in Austin, Texas. She earned a Bachelor of Arts degree in 2004. She began her career in education in 2007 and started off as a teaching assistant.

7. Andrea continued to focus on education and focused here career on those with special educational needs. In August 2008, she served as the Special Education SCORES Paraprofessional for Bailey Middle School. Her competence, combined with effective advocacy for those with special needs, propelled her career within the Austin Independent School District (“AISD”). Andrea’s positions included:

- Bailey Middle School – Special Education SCORES Teacher, August 2009 – August 2012;
- Murchison Middle School – Special Education Life Skills Paraprofessional, March 2013 – June 2013; and
- Gorzycki Middle School – Special Education Department Chair; Inclusion, Resource, SCORES, SBS, and Study Skills, August 2013 – June 2020.

Above these roles and job duties, Andrea also served as the Gorzycki Middle School Girls’ Athletic Coach from August 2014 through May 2019.

¹ Benjamin Summers is currently a middle school assistant principal and has been in education for over fifteen years.

8. Beginning in May 2021, Andrea started her newest role within AISD at Bowie High School. She served as the Special Education Chair, and her primary role was to act as the creator of the special education master schedule, including but not limited to staffing all special education teachers and paraprofessionals.

9. Andrea is well liked and made meaningful, measurable enhancements to the overall performance of the Special Education program at Bowie High School. She is adored by her colleagues; they even asked her to become part of the Campus Advisory Committee and to take part in the Instructional Cabinet. Over the previous year of employment with Bowie High School (as well as all of her time at AISD), Andrea received only wonderful reviews, which were rewarded well deserved promotions. At no time did she ever receive any disciplinary actions for misconduct or inappropriate behavior. Her teaching record is extraordinary, and she has been twice nominated by the campus as “Teacher of the Year”.

B. Who is Defendant, LeAnne Marie Hilton?

10. Defendant was born in 1986 and is 36 years old. She is currently unmarried, has four children (with two or three different men), and resides within the AISD school district. In fact, Defendant had to take one of her children’s fathers to court to actually establish paternity. She has three children that attend schools within AISD.

11. Defendant purports to be a current and active real estate agent and/or property management company. However, much like all other areas of her life, Defendant failed at making that a success. In fact, one or more disgruntled customers began a website called www.hiltonmismanagementgroup.com. This site alleges that Defendant made fake Yelp reviews, has her nine-year-old daughter listed as an employee and Nicole, another fake employee, is a half-sister. The website also shows the following:

Tenant

Handling tenant matters can be stressful and time consuming. Since LeAnn Marie Hilton doesn't give a shit, it will be more stressful and time-consuming if you hire LeAnn.

Short-Term Rental

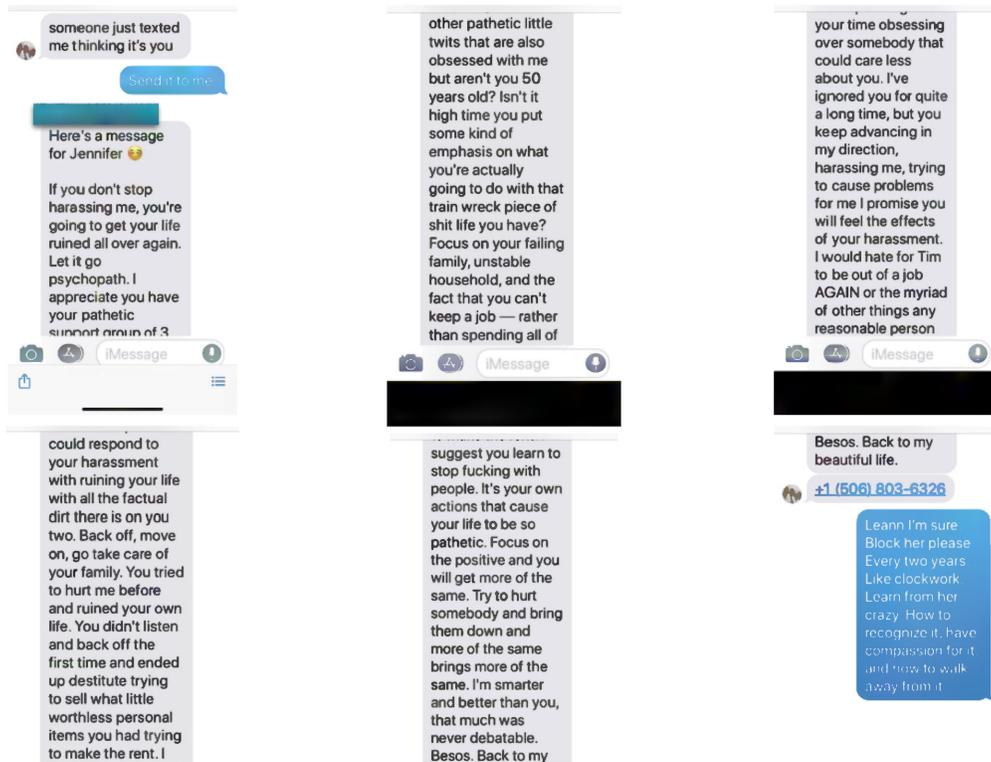
Have you been thinking about putting your place up for short-term rental, but feel nervous having strangers in your home? Well, just stop right there because LeAnn and Hilton Management are a goddamn train wreck.

The Hilton Property Management Group forfeited its existence with the Texas Secretary of State due to its failure to comply with Texas law yearly filing requirements.

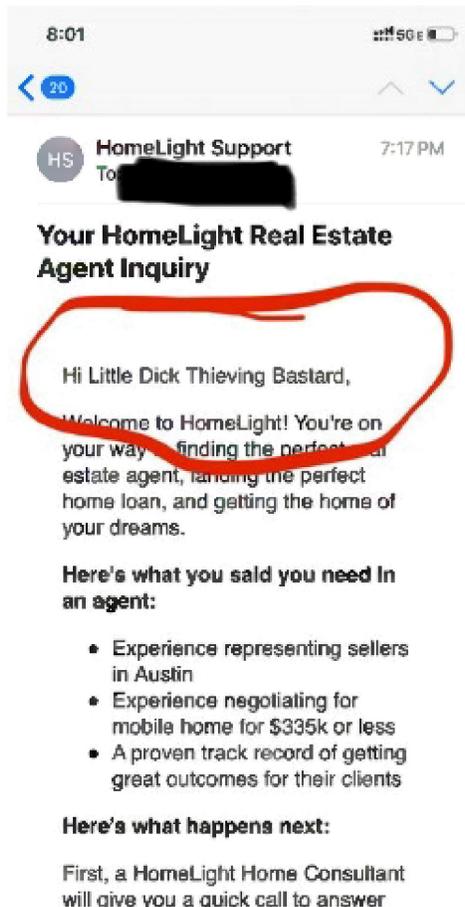
12. However, there is no need to speculate about Defendant’s actual conduct. Previously, she had multiple warrants out for her arrest and previously filed for bankruptcy. Through the bankruptcy, she attempted to avoid creditor claims of well over \$160,000.00. The refusal and inability to pay for her own loans also led to the repossession of two vehicles.

13. If that was not enough, Defendant also has a long history of deceptive behavior through email, websites, baseless allegations against anyone that she does not like. Let’s start with theft. Defendant allegedly stole \$56,000 from her former business partner and was sued in Federal Bankruptcy court.

14. Next, let’s cover stalking and harassment. Defendant stalked co-workers, and even their children, on multiple occasions. Upon being blocked by a co-worker, Defendant found the co-worker’s underage daughter’s phone number and stated repulsive, inappropriate, and false language about the child’s mother.



15. If one co-worker was not enough, Defendant verbally threatened and stalked another former co-worker who she has crusaded against since 2016. Defendant resorts to childish name calling:



16. Next on the list, Defendant acts as a scam artist in her deceitful and thieving actions towards individuals. Specifically, Defendant crafted 40+ Yelp reviews and text messages under fake names and fake Google account numbers. Within these messages, Defendant used frightful name-calling language to speak to and about individuals that Defendant does not approve of personally or professionally.

17. Defendant's conduct can be seen in the following plea on Facebook and language from a lawsuit filed against her. These again highlight the focus of Defendant's hateful and spiteful actions:



Joseph R. Castille for Tanglewood Forest Limited District

October 11, 2020 · 🌐

Are you sick of Tanglewood Forest drama? So am I. This is why I am working overtime to be elected.

Many of you have recieved, or will receive an extremely well-written smear message about me, my character, my business practices etc. This message is coming from "Jay Jefferson", who is not a real person. She will probably begin using other fake accounts with various male and female names to give the appearance that multiple people are concerned and reaching out to neighbors. This person is a woman who has stalked me, my family, and my clients for years. Her name is LeAnn Hilton, and she lives in Circle C. She has nothing to do with Tanglewood Forest.

Now that I am running for the Tanglewood Forest Board, I am 99.9% positive she has teamed up with an outgoing Director to execute this smear campaign. This same Director is the person who for the last 8 years has made Tanglewood Forest board such a toxic environment, that many of you have stopped participating in meetings and community events.

This person lists several lawsuits which my company was unfortunately forced to file against clients, most for failure to pay.

Several of the lawsuits listed are lawsuits between entities I have ZERO affiliation with, and was never sued by. But she includes them anyway for good measure, I assume.

In every case, they have all been dismissed out of court because there was simply no evidence to back up anyone's counterclaims against my companies. My companies have zero debt, and we have never had a late payment on even a one invoice. Out of the entire list of lawsuits, we have never lost a single case, ever.

The closest we have ever come to "losing" a case was in 2018 when we sued this stalker for Slander, Libel and Tortious Interference. The case was dismissed under 1st amendment protection, and she was awarded attorneys fees. Under the weight of her legal bills, she declared Bankruptcy and is in being sued in US Federal Court for Bankruptcy fraud and being investigated by the IRS and SBA for COVID-19 PPP loan fraud.

This latest attack on me and my family does not upset me in the least. In fact, it only highlights the lengths to which the person leaving the Board is willing to go to maintain his grip on our neighborhood. The harder they fight and seek to stop my campaign, the harder I will fight for you, my neighbors.

These emails to my family and hard-working neighbors are a perfect, in-your-face example of the type of drama and chaos that I will not tolerate, and will completely eliminate from the Board. You do not deserve this, and I will work relentlessly and aggressively to make sure that Tanglewood Forest returns to the happy, fun neighborhood I fell in love with 11 years ago.

As always, here is my personal cell number. 512-367-3084

I am happy to talk to any of you about any aspect of this smear campaign or about my plans to fix TFLD.

Lastly, the TFLD ballot is at the very very very end of the General Election Ballot. It is the last item on the ballot, but the one election that literally affects you and your family, in your own home. Go Vote!

My best,

Joseph R. Castille-The right Voice, the right Choice.

6. Apparently in May 2018, Hilton, using an anonymous alias of Kay Smith and using an email address of kaysd19822018@gmail.com sent an email to one of Valley View's customers notifying that customer of a lawsuit filed in Dallas County where Plaintiffs were mentioned and were accused of being complicit in violating the terms of a non-compete agreement and benefitting from such violations. Tensions between Defendants and Plaintiffs boiled over in early August 2018 when Hilton sent the following text to Castille:

"I will absolutely sue you and/or your company/companies. So I guess this is one last shot. Will (you) (survive) a yelp review that points people in the direction of a real, active lawsuit that talks about real, actual purported theft and embezzling?... I've also got your wife's number so it's your call...."

18. Next, how about sleeping with married men? It was alleged that Defendant was sleeping with at least one married man. The wife of the married man was so upset, she actually posted these signs throughout their neighborhood:



19. Simply put, Defendant is a poor version of a human being that will do anything to further her own desires.

C. Defendant terrorizes and attacks Andrea Skola!

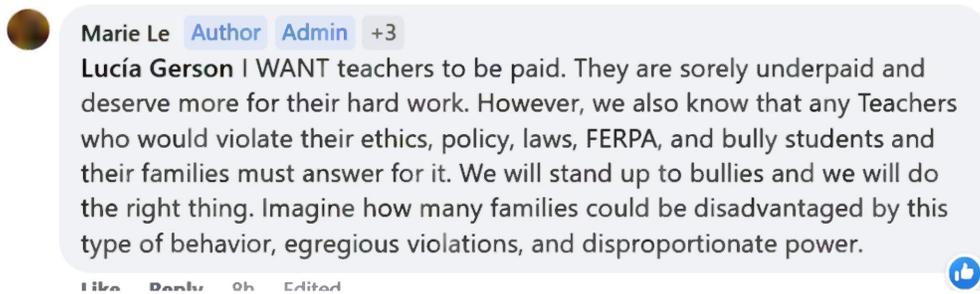
20. As consistently noted, Defendant is always the victim against an invisible enemy. But, she in fact is the one trying to remain invisible, through fake email addresses, fake Facebook groups and hiding behind anonymous allegations and posts. Instead of focusing on her own issues, Defendant constantly blames others for her life's many woes.

21. Defendant then found the next person to prey on – Andrea Skola, a wonderful teacher, mom, and wife caught in Defendant's horrific wrath.

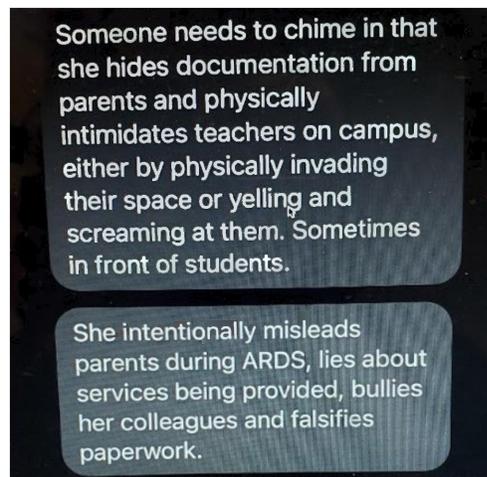
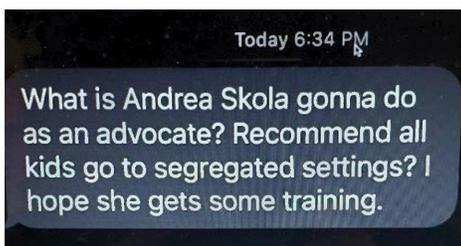
22. In 2022, Defendant's focus turned and destroyed Andrea. This started when Defendant interacted with Andrea on certain special education needs and programs within AISD. As with many other facets of Defendant's life, when she did not get her own way, she immediately turned on Andrea. This led to Defendant's singular goal – destroy Andrea, both personally and professionally, by all means possible. Defendant's pattern continued as her past actions fully show.

23. Defendant created a Facebook group purporting to be an official AISD page. In fact, she called it AISD Collaborates – consistent with her previous actions of creating a fake online presence. She then began making outlandish claims speaking against Andrea's well-known and liked character. Explicitly, Defendant made baseless claims framing Andrea as an individual that violated ethics, policies, laws, and FERPA federal legislation. All of this being done without regard to the truth, as Andrea has never violated any of these. Simply put, Defendant is spreading groundless claims that have financially and emotionally damaged Andrea.

24. Defendant fabricated Andrea's behavior with students to a degree that places her in a horrific light, discrediting all the remarkable amplifications she made for Bowie High School teachers, students, and parents. Andrea was placed in a circumstance where she was unable to defend herself against Defendant's dishonest claims due to her contract with AISD. This post was directed specifically to Andrea:

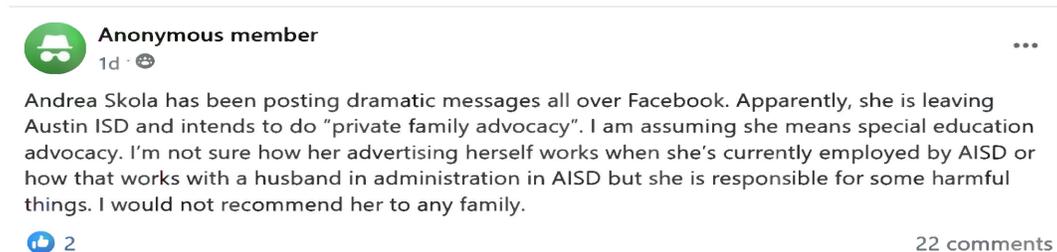


25. Shortly after, Defendant took to social media and Defendant continued to make additional baseless claims, so atrocious such claims could be capable of destroying Andrea's personal and professional life. Defendant's unwarranted comments on social media spreading false rumors and ruining a pronounced educator's career rather than focusing on herself:



26. Given the unrelenting harassment, Andrea was forced to take a leave of absence. This was all based upon the false claims that created an astounding level of stress for Andrea.

27. Upon taking a leave of absence from Bowie High School, Andrea was in the process of creating a private family advocacy, providing Special Education Services for families in need. Upon Defendant learning about Andrea’s advocacy program, Defendant immediately took to social media and continued to diminish her reputation by “not recommending her to any family.”



28. Defendant had a clear vendetta to demolish Andrea’s personal life and professional career.

29. When will Defendant’s actions stop? As to Andrea Skola, it will now and through this this lawsuit. The fact that Defendant continues to undertake these actions, harass people until their lives are damaged (emotionally and financially) and spreading blatant and false lies is a picture of how society works today. Social media and the actions of a single person can irreparably damage a distinguished and caring career. Well, this is not going to happen any longer and this court needs to stop Defendant and her improper conduct.

D. AISD fails to take action to support its teachers and staff.

30. Andrea Skola is pursuing this action alone, without the backing of AISD. This is based on one simple fact – AISD is scared to and refuses to act. AISD bows down to any pressure from parents, including this particular Defendant. A Defendant that is disgraceful, deceitful, and hateful to hardworking individuals. Rather than standing up for its most precious and dedicated teachers and staff, AISD simply buries its head, and does nothing. In a recent meeting, numerous teachers and administrators within AISD begged the Superintendent to take action. Do something to protect the teachers and administrators against the Defendant’s lies and falsities.² What was the Superintendent’s response? To date, AISD has NOT taken any action other than giving into

² When discovery opens in this matter, Ms. Skola’s counsel will subpoena AISD for each and every complaint ever made by Defendant within the AISD system.

Defendant's unwarranted demands, has disregarded the safety/protections that were put in place by the campus, has allowed the staff's safety and wellbeing to be compromised, and has failed to provide follow-up communications regarding this matter

31. AISD survived remote learning and Covid-19 because of these very teachers and administrators. These are the people dealing with students and parents on a daily basis. The wonderful students and parents and the horrific parents, like Defendant. But AISD has done and continues to do nothing to protect its most valuable resources. Shame on AISD.

V.
CAUSES OF ACTION

A. Count One: Defamation, Libel and Slander

32. Plaintiff hereby incorporates the foregoing paragraphs as if fully set forth verbatim.

33. Defendant published and made false statements about Andrea, her character, her professional career, and her business. All of these statements are false, inaccurate, misleading and lack complete truth. The statements were also made with actual malice to injure Andrea's mental and physical health and professional career (both at AISD and her new business). As a result of these false statements, Andrea was damaged. The full amount of Plaintiff's damages, along with punitive damages, will be determined by the trier of fact.

B. Count Two: Tortious Interference with Prospective Contract

34. Plaintiff hereby incorporates the foregoing paragraphs as if fully set forth verbatim.

35. Defendant knew of Andrea's business of special education advocacy. Defendant undertook a systematic and tortious course of action in an effort to interfere with such business relationships. Based upon the defamation set forth above, Defendant undertook an action to destroy any business opportunities afforded to Andrea. But for Defendant's actions, Andrea would have obtained more clients, those actually in need of special education advocacy. As a result, she suffered damages. The full amount of Plaintiff's damages, along with punitive damages, will be determined by the trier of fact.

C. Count Three: Intentional Infliction of Emotional Distress

36. Plaintiff hereby incorporates the foregoing paragraphs as if fully set forth verbatim.

37. Defendant undertook a series of tortious actions with the specific intent to inflict emotional distress upon Andrea. Such actions did in fact cause severe injury (emotionally, physically, and financially) to Andrea. Defendant's actions were intentional, outrageous, and extreme. The full amount of Plaintiff's damages, along with punitive damages, will be determined by the trier of fact.

D. Count Four: Declaratory Judgment

38. Plaintiff hereby incorporates the foregoing paragraphs as if fully set forth verbatim.

39. Andrea seeks a declaratory judgment as follows:

- i. That Defendant formed, started, and is the administrator of the AISD Collaborates Facebook group;
- ii. That such Facebook group is not sponsored by or affiliated with AISD;
- iii. That Defendant spread and allowed to be spread false information about Andrea and others;
- iv. That Defendant's intention is to confuse the public in believing that AISD Collaborates is an official AISD sponsored group; and
- v. That Defendant's intentions are to harm others with the AISD Collaborates Facebook group.

E. Count Five: Permanent Injunctive Relief

40. Plaintiff requests a judicial ruling that Defendant engaged in a systematic activity of defaming, libeling and slandering of Plaintiff.

41. Plaintiff met the necessary elements for permanent injunctive relief and requests that all future defamatory, libelous and slanderous actions be enjoined. Additionally, Defendant should be enjoined from portraying AISD Collaborates as an officially sponsored and approved vehicle for AISD communications.

F. Count Six: Request for Attorneys' Fee

42. Plaintiff hereby incorporates the foregoing paragraphs as if fully set forth verbatim.

43. Plaintiff was required to retain the services of the undersigned counsel in order to initiate this action. As such, Plaintiff is entitled to recover her reasonable attorneys' fees pursuant to applicable Texas law, plus additional attorneys' fees in the event of an appeal.

**VI.
JURY DEMAND**

44. Pursuant to TEX. R. CIV. P. 216 and TEX. GOV'T CODE ANN. § 51.604, Plaintiff demands a trial by jury and hereby tenders the requisite jury fee.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff Andrea Skola prays that Defendant LeAnn Marie Hilton be cited to appear herein and answer, and that upon final trial, that Plaintiff have judgment against Defendant for the following:

- (a) defamation;
- (b) tortious interference with prospective contracts;
- (c) intentional infliction of emotional distress;
- (d) declaratory judgment as set forth above;
- (e) permanent injunctive relief;
- (f) actual damages;
- (g) punitive damages;
- (b) pre- and post- judgment interest at the maximum permissible rate, at law or in equity;
- (c) reasonable attorneys' fees;
- (h) costs of court; and
- (i) all other relief, in law and in equity, to which she may be entitled.

Respectfully submitted,

SAVRICK, SCHUMANN, JOHNSON, MCGARR,
KAMINSKI & SHIRLEY, LLP

By: 

David A. Buono II
State Bar No. 24001806
4330 Gaines Ranch Loop, Suite I50
Austin, Texas 78735
Phone: (512) 347-1604
Fax: (512) 347-1676
Email: david@ssjmlaw.com

**ATTORNEY FOR PLAINTIFF
ANDREA SKOLA**