

LONE STAR PROJECT



6 E Street, SE, Washington, DC 20003 ★ 202/543-6971 ★ 202/547-8258 FAX

October 7, 2009

VIA FACSIMILE

Fax: 214.337.9558

The Honorable Kenneth Mayfield
Dallas County Commissioner, Precinct 4
Dallas County Administration Building
411 Elm Street , Dallas , Texas 75202

RE: Request for Public Information

Dear Commissioner Mayfield:

This request is made under the Texas Public Information Act (TPIA), chapter 552 of the Government Code, for the prompt production of the following information (regardless of physical form and including but not limited to invoices, receipts, billing statements, e-mails, letters, memoranda, agendas, calendars, schedules, faxes, fax cover sheets, phone calls, phone messages, etc..) held by you and or your office staff.

1. Any and all information in your possession or in your office staff's possession regarding the hiring of Danny Defenbaugh.
2. Any and all information in your possession or in your office staff's possession containing communications between you or your office and Danny Defenbaugh during the last six months.
3. Any and all information in your possession or in your office staff's possession containing communications between you or your office and any other county office regarding Danny Defenbaugh during the last six months.
4. Any and all information in your possession or in your office staff's possession containing communications regarding the cost or other budget impact pertaining to either the retention or the duties of Danny Defenbaugh including any billing, invoices, charges, or payment information.
5. Any and all information in your possession or in your office staff's possession

The Lone Star Project is an activity of the Lone Star Fund.

Contributions to the Lone Star Fund are not tax deductible. Federal law requires political committees to use our best efforts to report the name, mailing address, occupation and name of employer for each individual whose contributions exceed \$200 in a calendar year. The Lone Star Fund accepts federal contributions from individuals, partnerships, and other federal political committees of up to \$5,000 per calendar year.

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containing communications between you or your office and the County Administrator regarding Danny Defenbaugh.

6. Any and all information in your possession or in your office staff's possession regarding information Defenbaugh sought from you or your office or your staff during the last six months.
7. Any and all information in your possession or in your office staff's possession regarding the hiring of Sidney H. Davis.
8. Any and all information in your possession or in your office staff's possession containing communications between your office and any other county office regarding Sidney H. Davis Jr. during the last six months.
9. Any and all information in your possession or in your office staff's possession containing communications regarding the cost or other budget impact pertaining to the retention and duties of Sidney H. Davis, including any billing, invoices, charges, or payment information.
10. Any and all information in your possession or in your office staff's possession containing communications between you or your office and any other county office regarding investigation requests or suggestions, concerns, job performance, or possible investigations with any of the 5 elected Dallas County constables during the past two years.
11. Any and all information in your possession or in your office staff's possession containing communications between you or your office and other county offices regarding the potential investigation of constables by DA Watkins.
12. Any and all information in your possession or in your office staff's possession containing communications with any official of: the Republican Party of Texas, the Dallas County Republican Party, or any other Republican officeholder in the last 6 months.
13. Any and all information in your possession or in your office staff's possession containing communications with any news outlet, reporter, online website or blogger in the last 6 months regarding Dallas County Constables, DA Watkins, Danny Defenbaugh or Sidney H. Davis .

If you have any questions about the nature or scope of this request, please contact me as soon as possible. Since time is a factor, please communicate with me by telephone rather than by mail. My telephone number is 202-547-7610 or by email at mattangle@lonestarproject.net.

It is my understanding that the information sought does not fall within the scope of sections 552.107 or 552.103 of the Texas Government Code. The documents requested regarding the hiring and payments to Danny Defenbaugh and Sidney Davis are not protected under any exemptions and should be released immediately. Because Danny Defenbaugh is not a lawyer and does not have any official powers to prosecute

or subpoena individuals, no exceptions to Texas Open Records laws apply to him and all requested documents should be provided. If the documents relating to Defenbaugh and Davis requested herein are inappropriately withheld, your actions would constitute a clear violation of the Open Records Law. Accordingly, if you fail to produce the requested documents regarding Defenbaugh and Davis, I am prepared to bring an enforcement action against you in both your personal and official capacities.

If you determine that any portion of the information requested is exempted from required disclosure, please provide me with all portions of the requested information that are public and that can either be reasonably segregated from the information you believe is exempted or redacted.

If you determine that all or some portion of the information requested is exempted from required public disclosure under a particular exception, I request that you advise me as to which exceptions you believe apply. If you rely on previous determinations, please advise me of the applicable court decision or Attorney General's opinion that you are relying on to support your position.

I am willing to pay any reasonable fees related to the photocopying of this information as provided by law.

Please produce this information promptly as required by law, but in any event, not later than ten days from the date of this request. Thank you for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Matt Angle". The signature is fluid and cursive, with the first name "Matt" and last name "Angle" clearly distinguishable.

Matt Angle