



December 23, 2020

**BY EMAIL:** [publicrecords@oag.texas.gov](mailto:publicrecords@oag.texas.gov)

Office of the Attorney General  
Public Information Coordinator's Office – Mail Code 070  
P.O. Box 12039  
Austin, TX 78711

Re: Request for Records Under Texas Public Information Act/Texas Government Code Chapter 552.

Dear Sir/Madam:

Citizens for Responsibility and Ethics in Washington (“CREW”) makes this request for records pursuant to Texas Public Information Act/Texas Government Code Chapter 552.

Specifically, CREW requests:

1. All communications dating from August 1, 2020 to the present between your office and the Liberty Center for God and Country, or any of its employees, agents, or affiliates, including but not limited to Mark Aguirre, Steven F. Hotze, Jared Woodfill, and Jeffrey Yates.
2. All communications dating from August 1, 2020 to the present that mention or refer to the Liberty Center for God and Country, or any of its employees, agents, or affiliates, including those named above.

CREW requests records of any kind as defined by the public records law, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. If it is your position any portion of the requested records is exempt from disclosure, please identify the specific portion or portions that are exempt and the statutory basis for the withholding. Our request includes but is not limited to paper documents and electronic records, including emails and their attachments.

On December 15, 2020, the Texas Tribune reported that former police captain and private investigator Mark Aguirre was arrested for committing assault during his investigation into an alleged ballot harvesting scheme in Texas.<sup>1</sup> Aguirre was hired and paid by the Liberty Center for God and Country, a nonprofit organization created by prominent Texas GOP donor and election litigation activist, Steven F. Hotze. Court documents show that the investigator claims to have sought assistance from Texas Attorney

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<sup>1</sup> Erin Douglas, [Former Houston police captain accused of violent attempt to prove election conspiracy was hired by GOP activist's group](https://www.texastribune.org/2020/12/15/steven-hotze-texas-election-fraud-Houston-police-arrested/), *The Texas Tribune*, Dec. 15, 2020, available at <https://www.texastribune.org/2020/12/15/steven-hotze-texas-election-fraud-Houston-police-arrested/>.

General Ken Paxton, who has pursued litigation against other states for alleged voter fraud in the 2020 election.<sup>2</sup> The requested documents will show whether Paxton had any involvement with the group.

CREW is a non-profit corporation, organized under section 501(c)(3) of the Internal Revenue Code. CREW is committed to protecting the public's right to be aware of the activities of government officials, to ensuring the integrity of those officials, and to highlighting and reducing the influence of money on politics. CREW intends to analyze the information responsive to this request and to share its analysis with the public. The release of information obtained through this request is not in CREW's financial interest.

If there are any fees for searching or copying these records, please inform CREW if the cost will exceed \$100. However, CREW also requests a waiver of all fees because the disclosure of the requested information is in the public interest. The public is entitled to information concerning Ken Paxton's possible involvement in an investigation of alleged voter fraud that resulted in assault charges. Further, this information is not being sought for commercial purposes. Please advise us if the costs associated with processing this request will exceed \$100.00.

If you have any questions about this request or foresee any problems in fully releasing the requested records, please contact me at [ali@citizensforethics.org](mailto:ali@citizensforethics.org). Where possible, please produce records in electronic format. Please send the requested records to me in electronic form at [ali@citizensforethics.org](mailto:ali@citizensforethics.org). If it's not possible to produce them electronically, please contact me at that email, and I will provide a mailing address. Thank you for your assistance.

Sincerely,



Angela Li  
Citizens for Responsibility and Ethics in Washington

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<sup>2</sup> See affidavit from Harris County District Court, Dec. 10, 2020, available at <https://www.courthousenews.com/wp-content/uploads/2020/12/houston-aguirre.pdf>