



CITIZENS FOR
RESPONSIBILITY &
ETHICS IN WASHINGTON

September 30, 2021

The Honorable Briscoe Cain
State Representative
P.O. Box 2910
Austin, TX 78768-2910
Briscoe.Cain@house.texas.gov

Representative Cain:

Citizens for Responsibility and Ethics in Washington (“CREW”) makes this request for records from the Texas House of Representatives pursuant to Chapters 551 and 552 of the Texas Government Code (“The Open Meetings Act” and “The Texas Public Information Act”, respectively).

Specifically, CREW requests the following records from October 1, 2020 to the date this request is processed:

1. All records reflecting any communications, meetings, phone calls, or conversations with the following non-governmental organizations and individuals:
 - i. Alliance Defending Freedom | email domain: @adflegal.org
 - ii. American Legislative Exchange Council (ALEC) | email domain: @alec.org
 - iii. American Principles Project | email domain: @americanprinciplesproject.org
 - iv. Americans United for Life | email domain: @aul.org
 - v. Concerned Women for America | email domain: @cwfa.org
 - vi. Family Research Council | email domain: @frc.org
 - vii. Federalist Society | email domain: @fedsoc.org
 - viii. First Liberty Institute | email domain: @firstliberty.org
 - ix. Heritage Action for America | email domain: @heritageaction.com
 - x. Heritage Foundation | email domain: @heritage.org
 - xi. iVoterGuide
 - xii. Life Dynamics | email domains: @lifedynamics.com, @prolifeamerica.com
 - xiii. National Right to Life | email domain: @nrlc.org
 - xiv. Pro-Life Action League | email domain: @prolifeaction.org
 - xv. Right to Life East Texas
 - xvi. Susan B. Anthony List | email domain: @sbalist.org
 - xvii. Texans for Life Coalition | email domain: @texlife.org
 - xviii. Texas Alliance for Life | email domain: @texasallianceforlife.org
 - xix. Texas Eagle Forum
 - xx. Texas Right to Life | email domain: @txrtl.com

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- xxi. Texas Values | email domain: @txvalues.org
- xxii. The Justice Foundation | email domain: @txjf.org
- xxiii. U.S. Pastor Council | email domain: @uspastorcouncil.org
- xxiv. Mark Lee Dickson
- xxv. Jonathan F. Mitchell
- xxvi. Elizabeth Graham

2. All records reflecting any analysis, consideration, or determination regarding the public enforcement mechanism established by Section 171.208 of Texas House Bill (“HB”) 1515.

Please search for responsive records regardless of format, medium, or physical characteristics. We seek records of any kind, including paper records, electronic records, audiotapes, videotapes, photographs, data, and graphical material. Our request includes without limitation all correspondence, letters, emails, text messages, facsimiles, telephone messages, voice mail messages, and transcripts, notes, or minutes of any meetings, telephone conversations, or discussions. Our request also includes any attachments to emails and other records, as well as emails to which the subjects of this request were cc’ed or bcc’ed.

If it is your position that any portion of the requested records is exempt from disclosure, please state the basis of the exemption you contend is applicable. Tex. Code § 552.301. Further, should you intend to request a decision by the Attorney General concerning your determination to withhold any portion of the requested records, please provide a written statement and any communications to the Attorney General pertaining to said request within the applicable statutory period. Tex. Code § 552.301(d). If some portions of the requested records are properly exempt from disclosure, please redact those portions and produce the remainder of the requested records. Tex. Code § 552.221.

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, CREW agrees to pay up to \$100. However, CREW also requests a waiver of all fees associated with the instant request because the disclosure of the requested information is in the public interest. Tex. Code § 552.267. The public is entitled to information concerning the decision-making processes of the Texas House of Representatives that factored into the passage of HB 1515, which will likely have a widespread effect on a significant portion of the state’s populace. Further, this information is not being sought for commercial purposes. If copying fees are expected to exceed \$100, or if you anticipate that “extensive use” of information technology resources or



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extensive clerical or supervisory assistance will be needed to fulfill this request, please contact me at (513) 300-8098 or foia@citizensforethics.org.

Where possible, please produce records in electronic format. Please send the requested records to me at either foia@citizensforethics.org or Courtney Bernard, Citizens for Responsibility and Ethics in Washington, 1331 F St. NW, Suite 900, Washington, D.C. 20004.

Please contact me if you have any questions about this request or foresee any problems in fully releasing the requested records.

Thank you for your assistance.

Sincerely,

A handwritten signature in black ink that reads "Courtney Bernard". The signature is written in a cursive, flowing style.

Courtney Bernard
Legal Intern