



**March 4, 2025**

**SUBMITTED BY EMAIL**

Mr. Daniel H. Sharphorn  
Vice Chancellor and General Counsel  
The University of Texas System  
210 West 7th Street  
Austin, Texas 78701-2903

**RE: Public Information Act Request**

Dear Sir/Madam:

Citizens for Responsibility and Ethics in Washington ("CREW") makes this request for records pursuant to the Texas Public Information Act, Tex. Gov't Code § 552.021 et seq. Specifically, CREW requests all records from **January 20, 2015, to the present** concerning the University of Texas System Administrative Office, the University of Texas at Austin, and the University of Texas at Dallas response to public gatherings or protests in Texas.

This request includes without limitation the following records:

1. All communications with the Office of the Governor, Office of the Attorney General of Texas or the Texas Department of Public Safety that describe policy, tactics, procedures, and equipment to be used by law enforcement officers in response to public gatherings or protests in Texas.
2. All communications with any federal agency regarding law enforcement response to any public gathering or protest response activities in Texas, including without limitation the Department of Justice, the Federal Bureau of Investigation, the Drug Enforcement Administration, the Department of Homeland Security, U.S. Customs and Border Protection, U.S. Immigration and Customs Enforcement, Federal Protective Services, or the Department of Defense.
3. All communications with any members of Congress, congressional staff, or congressional committees regarding law enforcement response to any public gathering or protest response activities in Texas;
4. All records related to any alleged misconduct by or disciplinary action taken against any employee of the University of Texas System in response to public gatherings or protests in Texas.
5. All records related to any disciplining of any employee of the University of Texas System for misconduct related to protest response in Texas.
6. All communications related to deploying the National Guard in response to public gatherings or protests in Texas.
7. All records of consideration or implementation of new, updated, or revised policies for procedures when responding to incidents and arrests of civilians engaged in public gatherings or protests in Texas.

This request excludes news articles and other publicly available materials without any accompanying discussion by government officials.

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 those who were cc'ed or bcc'ed on any emails.

If it is your position any portion of the requested records is exempt from disclosure, please cite each specific exemption you feel justifies the refusal to release the information and notify CREW of the appeal procedures available under the law. CREW requests that you state in writing and with particularity the reasons for any conclusion that a record is exempt or confidential. If some portions of the requested records are properly exempt from disclosure, you are required to redact those portions and produce the remainder of the requested records.

Freedom of expression and the right to peaceful assembly are fundamental rights guaranteed by the federal and state constitutions. The Texas Constitution guarantees that “[e]very person shall be at liberty to speak, write or publish his opinions on any subject . . . and no law shall ever be passed curtailing the liberty of speech . . . .” Tex. Const. Art. I, § 8. The Texas Constitution also guarantees the right of assembly, stating that “[t]he citizens shall have the right . . . to assemble together for their common good.” Tex. Const. Art. I, § 27. Governor Greg Abbott has long championed freedom of speech. On June 27, 2019, Governor Abbott signed a bill concerning free speech on college campuses, noting that it is also a right guaranteed under the First Amendment. *See @GregAbbott\_TX*, X (June 9, 2019, 8:12 PM), [https://x.com/GregAbbott\\_TX/status/1137875109362974724](https://x.com/GregAbbott_TX/status/1137875109362974724).

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, ensuring the ethical compliance and integrity of those officials, and highlighting and reducing the influence of money on politics. CREW intends to analyze the information responsive to this request and 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 the Texas Department of Public Safety’s response to public gatherings and protests. Further, this information is not being sought for commercial purposes.

If you have any questions about this request or foresee any problems in fully releasing the requested records, please contact me at [REDACTED] and please copy [foiareturns@citizensforethics.org](mailto:foiareturns@citizensforethics.org) on all communications.

Where possible, please produce records in electronic format. Please send the requested records to me in electronic form to [REDACTED] and [foiareturns@citizensforethics.org](mailto:foiareturns@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.

Respectfully,

*Kayvan Farchadi*

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