

# GIFFORDS LAW CENTER

TO PREVENT GUN VIOLENCE

**CREW** | citizens for responsibility  
and ethics in washington

November 20, 2019

Rep. Dade Phelan  
Texas House of Representatives  
P.O. Box 2910  
Austin, TX 78768  
(512) 463-0706  
[Dade.Phelan@house.texas.gov](mailto:Dade.Phelan@house.texas.gov)

To Whom It May Concern:

Citizens for Responsibility and Ethics in Washington (“CREW”) and Giffords Law Center to Prevent Gun Violence (“Giffords Law Center”) make this request for records, regardless of format, medium, or physical characteristics pursuant to the Texas Public Information Act/Texas Government Code Chapter 552.

Specifically, CREW and Giffords Law Center seek:

1. All communications dating from January 1, 2019 to the present between your office and the National Rifle Association, or any of its employees, agents, or affiliates including but not limited to Wade Callender and Tara Mica-Reilly.
2. All communications dating from January 1, 2019 to the present between your office and the National Association for Gun Rights, or any of its employees, agents, or affiliates.
3. All communications dating from January 1, 2019 to the present between your office and the Texas Gun Rights, or any of its employees, agents, or affiliates, including but not limited to Chris McNutt.
4. All communications dating from January 1, 2019 to the present between your office and the Texas State Rifle Association, or any of its employees, agents, or affiliates including but not limited to Mark D. Borskey and Mike D. Cox.
5. All communications dating from January 1, 2019 to the present between your office and the Texas Concealed Handgun Association, or any of its employees, agents, or affiliates, including but not limited to Bobby Clakley and Wallace Dunn.
6. All communications dating from January 1, 2019 to the present between your office and the Second Amendment Foundation, or any of its employees, agents, or affiliates, including but not limited to Joseph Tartaro and Alan M. Gottlieb.

This request includes but is not limited to discussions of House Bill 1177.

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, and email recipients who were cc'ed or bcc'ed.

If Rep. Phelan is not the custodian of the requested records, please forward the request to the appropriate department, office, or entity in possession or custody of the records.

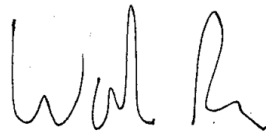
If there are any fees for searching or copying these records, please inform CREW if the cost will exceed \$100. However, CREW and Giffords Law Center also request a waiver of all fees because the disclosure of the requested information is in the public interest. The public is entitled to information about how groups that seek to influence gun policy legislation communicate with state legislators who introduce such legislation. Further, this information is not being sought for commercial purposes.

The law requires that this request be responded to and fulfilled promptly, barring extenuating circumstances [Texas Public Information Act / Texas Government Code Chapter 552]. If access to the records CREW and Giffords Law Center are requesting will take an extended period of time, please contact CREW with a written explanation that states when the requested record will be produced and specifies with particularity why the records cannot be produced.

If you have any questions about this request or foresee any problems in fully releasing the requested records, please contact me at (202) 408-5565 or [wdavis@citizensforethics.org](mailto:wdavis@citizensforethics.org). CREW also welcomes the opportunity to discuss with you whether and to what extent this request can be narrowed or modified to allow for better processing within Texas state law deadlines. If you deny any or all of this request, 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.

Where possible, please produce records in electronic format. Please send the requested records to [askaggs@giffords.org](mailto:askaggs@giffords.org) or Adam Skaggs, Giffords Law Center to Prevent Gun Violence, 12 East 49th Street, 11th Floor, New York, NY 10017. Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Walker Davis". The signature is fluid and cursive, with the first name "Walker" and the last name "Davis" clearly distinguishable.

Walker Davis  
Research Manager

Citizens for Responsibility and Ethics in Washington