

March 24, 2004

Sent Via Telefax

Re: Open Records Request

Dear Office of the Texas Attorney General:

Pursuant to the Texas Public Information Act, we submit the following Open records request. Since Public Citizen is a non-profit public interest organization, we respectfully request that your office waive any fees.

Sincerely,

Open Records Request

Definitions:

“TRM” means the Texans for A Republican Majority, Americans for a Republican Majority and any subsidiaries or affiliated entities, and any of their employees, officers, directors, lawyers, agents, contractors, political consultants, lobbyists, lawyers, representatives, and/or advisory board members (including without limitation, John Colyandro, Bill Ceveraha, Rep. Tom Delay, Rep. Beverly Woolley, Rep. Diane Delesi, Rep. Tom Craddick, Sen. Shapiro, Jim Ellis, and/or anyone or any entity on their behalf.).

“TAB” means the Texas Association of Business, CIVIC, BACPAC, and any subsidiaries or affiliated entities, and any of their employees, officers, directors, lawyers, members, member representatives, agents, contractors, political consultants, lobbyists, lawyers, representatives, advisory board members and/or anyone or any entity on their behalf.

“TRL” means the Texans for Lawsuit Reform, its PAC, and any subsidiaries or affiliated entities, and any of their employees, officers, directors, lawyers, agents, contractors, political consultants, lobbyists, lawyers, representatives, and/or advisory board members (including without limitation).

“Speaker Craddick” means Rep. Tom Craddick in any capacity, including as an agent of TRM, a Speaker candidate and Speaker pledges.

“Texas Attorney General” means the entire office and staff, including Attorneys General Abbott and Cornyn, and their agents, advisers, political consultants, and representatives, and includes all documents and files located on state premises or under the control of the office or Attorneys General Abbott or Cornyn.

Open Records Request No. 1

All documents passing through TRM and the Texas Attorney General during 2002- to the present pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 2

All notes of meetings or communication between TRM and the Texas Attorney General during 2002- to the present, pertaining to TAB, TRM, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 3

All documents passing between TRM and the Texas Attorney General during 2002- to the present.

Open Records Request No. 4

All notes of meetings or communication between TRM and the Texas Attorney General during 2002- to the present.

Open Records Request No. 5

All documents passing between TRM's attorneys (including but not limited to, Andy Taylor, Amanda Peterson, Ed Shack, Terry Scarborough, Roy Minton and the firms of Any Taylor and Associates, Hance Scarborough Wright Ginsberg and Minton, Burton, Foster, and Collins (hereinafter defined collectively as "TRM's attorneys")) and the Texas Attorney General's Office pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 6

All notes of meetings or communication between TRM's attorney's and the Texas Attorney General's Office pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002 election

Open Records Request No. 7

All documents passing through TAB and the Texas Attorney General during 2002- to the present pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 8

All notes of meetings or communication between TAB and the Texas Attorney General during 2002- to the present, pertaining to TAB, TRM, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 9

All documents passing between TAB and the Texas Attorney General during 2002- to the present.

Open Records Request No. 10

All notes of meetings or communication between TAB and the Texas Attorney General during 2002- to the present.

Open Records Request No. 11

All documents passing between TAB's attorneys (including but not limited to, Andy Taylor, Amanda Peterson, Ed Shack, Terry Scarborough, Roy Minton and the firms of Any Taylor and Associates, Hance Scarborough Wright Ginsberg and Minton, Burton, Foster, and Collins (hereinafter defined collectively as "TAB's attorneys")) and the Texas Attorney General's Office pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 12

All notes of meetings or communication between TAB's attorney's and the Texas Attorney General's Office pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 13

All notes of meetings or communication between TAB's and/or TRM's attorney's and and the Texas Attorney General's Office pertaining to express advocacy, issue ads, the corporate prohibition, administrative expenses and/or any other issue or matter in the TAB and TRM civil suits or criminal investigation.

Open Records Request No. 14

All documents passing between TAB's and/or TRM's attorney's and and the Texas Attorney General's Office pertaining to express advocacy, issue ads, the corporate prohibition, administrative expenses and/or any other issue or matter in the TAB and TRM civil suits or criminal investigation

Open Records Request No. 15

All documents passing through TLR and the Texas Attorney General during 2002- to the present pertaining to the activities of TAB, TRM, TLR, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 16

All notes of meetings or communication between TLR and the Texas Attorney General during 2002- to the present, pertaining to TAB, TRM, TLR and/or Speaker Craddick during the 2002 election.

Open Records Request No. 17

All documents passing between TLR and the Texas Attorney General during 2002- to the present.

Open Records Request No. 18

All notes of meetings or communication between TLR and the Texas Attorney General during 2002- to the present.

Open Records Request No. 19

All documents passing between TLR's attorneys and the Texas Attorney General's Office pertaining to the activities of TAB, TRM, TLR and/or Speaker Craddick during the 2002 election.

Open Records Request No. 20

All notes of meetings or communication between TLR's attorney's and the Texas Attorney General's Office pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002 election

Open Records Request No. 21

All documents passing through Texas Republican Party, and/or any of its affiliates, subsidiaries, employees, officers, chair Tina Benkiser, consultants, directors, agents, and/or representatives (hereafter collectively the "Texas Republican Party") during 2002- to the present pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 22

All notes of meetings or communication between the Texas Republican Party and the Texas Attorney General during 2002- to the present, pertaining to TAB, TRM, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 23

All documents passing through the National Republican Party, and/or any of its affiliates, subsidiaries, employees, officers, chair, consultants, directors, agents, and/or representatives (hereafter collectively the "Texas Republican Party") during 2002- to the present pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 24

All notes of meetings or communication between the National Republican Party and the Texas Attorney General during 2002- to the present, pertaining to TAB, TRM, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 25

All notes of meetings or communication between TAB and the Texas Attorney General's Office pertaining to express advocacy, issue ads, the corporate prohibition, administrative expenses and/or any other issue or matter in the TAB and TRM civil suits or criminal investigation.

Open Records Request No. 26

All documents passing between TAB and the Texas Attorney General's Office pertaining to express advocacy, issue ads, the corporate prohibition, administrative expenses and/or any other issue or matter in the TAB and TRM civil suits or criminal investigation

Open Records Request No. 27

All notes of meetings or communication between TRM and the Texas Attorney General's Office pertaining to express advocacy, issue ads, the corporate prohibition, administrative expenses and/or any other issue or matter in the TAB and TRM civil suits or criminal investigation.

Open Records Request No. 28

All documents passing between any person or entity and the Texas Attorney General's Office pertaining to express advocacy, issue ads, the corporate prohibition, administrative expenses and/or any other issue or matter in the TAB or TRM civil suits or criminal Investigation

Open Records Request No. 29

All notes of meetings or communication between any person or entity and the Texas Attorney General's Office pertaining to express advocacy, issue ads, the corporate prohibition, administrative expenses and/or any other issue or matter in the TAB and TRM civil suits or criminal investigation.

Open Records Request No. 30

All documents passing between the Texas Attorney General and any member of the media, during 2002- to the present, pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002

Open Records Request No. 31

All documents evidencing the calendar, day timer, schedule, or diary from January 1, 2003-present of Greg Abbott or any other person who has received or sent information pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002 election .

Open Records Request No. 32

All documents passing between the Texas Attorney General's office and any political consultant from 2002 to the present pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002 election.

Open Records Request No. 33

All press releases and drafts of press releases pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002 election..

Open Records Request No. 34

All materials provided to the press pertaining to the activities of TAB, TRM, and/or Speaker Craddick during the 2002

Open Records Request No. 35

All documents passing through the Texas Attorney General pertaining to transferring the Travis County Public Integrity Unit to the Texas Attorney General or any other office.

Open Records Request No. 36

All notes of meetings or communication pertaining to transferring the Travis County Public Integrity Unit to the Texas Attorney General or any other office.

Open Records Request No. 37

All documents passing through the Texas Attorney General pertaining to the jurisdiction of the Texas Attorney General over the TAB and TRM investigations.

Open Records Request No. 38

All notes of meetings or communication pertaining the jurisdiction of the Texas Attorney General over the TAB and TRM investigations.