



Advocates for Government Accountability

A 501(c)(3) Nonprofit Corporation

August 12, 2013

VIA E-MAIL

Ms. Jeri Carter
Open Records Project Manager
Dallas City Hall
Public Information Office
1500 Marilla, 4ES
Dallas, TX 75201
Phone: 214-671-8570
E-mail: openrecords@dallascityhall.com

RE: Public Information Act Request

Dear Ms. Carter:

We write on behalf of Cause of Action, a nonprofit, nonpartisan organization that uses investigative, legal, and communications tools to educate the public on how government accountability and transparency protects taxpayer interests and economic opportunity. In furtherance of this mission, we are interested in the City of Dallas's Mercantile Bank complex redevelopment and the ways in which Forest City Residential Group has pursued its plans for that project.

Therefore, pursuant to the provisions of the Public Information Act,¹ Cause of Action hereby requests that the City of Dallas produce within ten (10) business days the following records:

All records of communications from April 1, 2005 to June 31, 2005, between former Mayor Laura Miller, Chief of Staff Crayton Webb, Don Hill, J. Hammond Perot, Jerry Killingsworth, Mitchell Rasansky, Ed Oakley, or City Manager Mary Suhm and any employee, agent, contractor, consultant or lobbyist of Forest City Enterprises or Forest City Texas (including all emails using the domain "@forestcity.net").

Request for a Waiver or Reduction of Fees

Cause of Action is a nonprofit organization as defined under Section 501(c)(3) of the Internal Revenue Code and it does not seek this information to benefit commercially. Cause of Action is organized and operated, among other things, to publish and broadcast "news," *i.e.*, information that is about current events or that would be of current interest to the public.

¹ TEX. GOV'T CODE ANN. ch. 552 (2013).

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Disclosure of the requested records is in the public interest because it will shed light on the efforts of the City of Dallas to facilitate real estate development. Therefore, we request that the responsive records be produced without charge or at a reduced charge in accordance with Section 552.267(a) of the Public Information Act.

Production of Records and Contact Information

In an effort to facilitate production, Cause of Action requests that all responsive records be produced in electronic format (*e.g.*, e-mail, pdf). If a certain set of responsive records can be produced more readily, we respectfully request that those records be produced first and that the remaining records be produced on a rolling basis as circumstances permit.

If you have any questions about this request, please contact me by e-mail at allan.blutstein@causeofaction.org or by telephone at (202) 499-4232. Thank you for your attention to this matter.



ALLAN BLUTSTEIN
SENIOR COUNSEL