

August 8, 2022

Records Officer Cameron County District Attorney's Office 964 E. Harrison Street Brownsville, TX 78520

Via Email: <u>districtattorney@co.cameron.tx.us</u>

Victoria.Cisneros@co.cameron.tx.us

Re: Request Under Texas Public Information Act

Dear Ms. Cisneros or other Public Information Officer,

I am Senior Counsel at LatinoJustice and submit this request pursuant to the Texas Public Information Act, Gov't Code § 552.001 (the "Act"). I can accept the requested documents in digital format. They may be emailed to me as an attachment or delivered through an FTP/FTA system at the email address acase@latinojustice.org.

The relevant period for this request is from June 1, 2021 and ongoing through the present.

Documents Requested

- 1) All documents regarding the investigation of the incident on or about June 9, 2021 that was the subject of a letter from your office to SpaceX on June 18, 2021, as reported by multiple media outlets. This request includes, but is not limited to:
 - a. All documents prepared by the employees of BDAO regarding the June 9 incident, including timesheets, memo book entries, memos documenting the operation prepared both before and after it, and all written statements by BDAO employees prepared subsequent to the event regarding the event.
 - b. Any calendar entries or other documentation regarding a meeting between your office and SpaceX regarding the June 9, 2021 incident.
 - c. All subpoenas, interview requests, document requests, or other investigative instruments issued by BDAO relating to the incident.
 - d. All summaries of interviews conducted relating to the incident.
 - e. All documents received by BDAO in response to any subpoena or document request relating to the incident.
 - f. All indictments, informations, and other charging documents prepared by BDAO relating to the incident.
 - g. Any public statement from your office regarding the decision on whether or not to charge any person for a criminal offense related to the incident.
- 2) All communications incident on or about June 9, 2021 in which employees of the Brownsville District Attorney's Office (BDAO) were allegedly "approached, stopped, and detained" by a security officer wearing a "tactical bulletproof vest" near Boca Chica Beach. This request includes, but is not limited to:



- a. Any complaint or communication from the public that led to your office's initial investigation on June 9, 2021.
- b. Any internal communication from your office's investigators regarding the incident on June 9, 2021.
- c. The letter your office sent to SpaceX on or about June 18, 2021.
- d. Any response from SpaceX to that letter.
- e. All communications between BDAO and any private company other than SpaceX relating to the incident, including but not limited to any private security firm, The Boring Company, Spaced Channel, and Spaced Ventures, including correspondence both sent and received by BDAO.
- f. All communications between BDAO and any member of the media, including but not limited to all communications between BDAO and the author of the June 16, 2021 article in Red Orbit entitled "Authorities Issue Warning to SpaceX for Closing Beaches, Public Roads," including correspondence sent and received by BDAO.
- 3) All documents relating to the arrest of Bekah Hinojosa on or about February 16, 2022 by the Brownsville police department. This request includes but is not limited to:
 - a. All subpoenas, interview requests, document requests, or other investigative instruments issued by BDAO relating to the incident.
 - b. All summaries of interviews conducted relating to the incident.
 - c. All documents received by BDAO in response to any subpoena or document request relating to the incident.
 - d. All indictments, informations, and other charging documents prepared by BDAO relating to the incident.
- 4) All documents relating to the arrest of Bekah Hinojosa on or about February 16, 2022 by the Brownsville police department. This request includes but is not limited to:
 - a. All communications between BDAO and any employee of the City of Brownsville regarding the incident, including but not limited to communications between BDAO and the mayor's office and communications between BDAO and the Brownsville Police Department.
 - b. All communications between BDAO and any media outlet relating to the arrest.
 - c. All communications between BDAO and any private company relating to the arrest.

As always, I am available to discuss this request or to clarify any request within it by phone at 212-739-7605 or by email at acase@latinojustice.org.

Thank you for your time and attention to this matter.

Andrew Case