

August 26, 2025

Attorney General Ken Paxton
Office of the Attorney General
300 W. 15th Street
Austin, TX 78701

Dear Attorney General Paxton:

Enclosed please find a revised formal request submitted under the Freedom of Information Act (FOIA) and Texas open records laws.

This Freedom of Information Act request is the result of information obtained over several years including via lawsuits, stonewalling by government entities, and information coming to me from across Texas which evidence of oversight failure leads to a realization that the culmination is a Societal Issue. It is my sincere desire to obtain the information requested herein in an effort to head off a major economic issue regarding bond financing for the school districts and the State of Texas while simultaneously provide a workable solution. One would suggest, that you can't fix what you can't see. For the benefit of all, this request under the Freedom of Information Act, has been assembled.

This request seeks records, audits, verifications, and opinions related to the oversight of Central Appraisal Districts (CADs), the State Comptroller's property tax administration, the School Districts interactions with the CADs and related enforcement actions.

To ensure clarity, this request specifically applies to the period of January 1, 2017 through August 1, 2025. The term "records" includes, but is not limited to, emails, correspondence, memoranda, reports, audits, complaints, resolutions, communications, databases, spreadsheets, and any written or electronic materials. This includes records involving any Central Appraisal District in Texas, including but not limited to Denton CAD.

The purpose of this request is to ensure transparency, accountability, and compliance with state and federal law in the administration of property taxation in Texas. The requested records concern oversight authority, enforcement practices, appraisal accuracy, bond financing, affordability impacts, and allegations of fraud or improper conduct within appraisal districts.

We respectfully ask that responsive records be provided electronically, if available. If any part of this request is denied, please include the legal basis for the denial and release all segregable portions of responsive documents.

Thank you for your attention to this matter.

Respectfully submitted,


Mitchell Vexler, President G.P.
Mavex Shops of Flower Mound LP
& Mockingbird Properties
1913 Justin Road Suite 117
Flower Mound, Texas 75028
Tel. 214-725-9013
Email: mitch@mockingbirdprop.com
www.mockingbirdproperties.com/dcad

Texas Public Information Act Request

From: Mitchell Vexler

Date: 8/26/2025

To: Public Information Coordinator, Office of the Attorney General of Texas

Via: Email & FedEx

publicrecords@oag.texas.gov

Office of the Attorney General

Public Information Coordinator's Office – Mail Code 070

209 W. 14th Street

Austin, TX 78701

To: Office of the Attorney General

Via: FedEx

Office of Attorney General

Attorney General Ken Paxton

300 W. 15th Street

Austin, TX 78701

Copied To: Office of the Inspector General of Texas

Via: FedEx

Office of the Inspector General of Texas, North Austin Complex

4601 W. Guadalupe Street, Austin, TX 78751-3146

Copied To: Securities and Exchange Commission

Via: Email, FedEx & Hand Delivery

Chairman@sec.gov

Securities and Exchange Commission, Chairman Mr. Paul S. Atkins

100 F Street, NE, Washington, D.C. 20549

Copied To: U.S. Department of Justice

Via: FedEx

U.S. Department of Justice, Attorney General Pamela Bondi

950 Pennsylvania Avenue, NW, Washington, D.C. 20530-0001

Copied To: Federal Bureau of Investigation

Via: FedEx

Federal Bureau of Investigation, Director Kash Patel

935 Pennsylvania Avenue, NW, Washington, D.C. 20535-0001

Copied To: USPS Office of the Inspector General

Via: FedEx

USPS Office of Inspector General, Inspector General Tammy Hull

1735 N. Lynn Street, Arlington, VA 22209

Copied To: Internal Revenue Service

Via: FedEx

Internal Revenue Service, Acting Commissioner Scott Bessent
1111 Constitution Avenue, NW, Washington, D.C. 20224

Copied To: Wall Steet Journal

Via: Email

Copied To: Washington Counsel

RE: Request for Public Information (Freedom of Information Act Request) concerning Texas Office of Attorney General (OAG) oversight, communications, audits, and analyses related to Texas Central Appraisal Districts (CADs), the State Comptroller, school district bonds/finance, and related licensing and appraisal standards (2017–present).

Introduction

This request is made under the Freedom of Information Act (FOIA) and applicable provisions of Texas open records laws. The undersigned respectfully requests records, audits, opinions, and verifications related to the oversight and enforcement of property tax administration, appraisal districts, and related entities in Texas.

For the purpose of this request, the term “records” includes, but is not limited to, emails, correspondence, memoranda, reports, audits, complaints, resolutions, communications, databases, spreadsheets, and any written or electronic materials. All records, including but not limited to emails, memoranda, and internal reports, that contain or are related to allegations concerning: a. Fraud or deceptive practices by Central Appraisal Districts or their employees; b. Violations of the Texas Property Tax Code; c. Conspiracy or oath of office violations by CAD or appraisal board members; d. Any communications referencing or related to Title 18 U.S.C. §1961 (Racketeer Influenced and Corrupt Organizations Act) or federal securities fraud allegations in the context of Texas municipal bond issues. This request applies to the time period from January 1, 2017 through August, 1, 2025 unless otherwise noted.

Requested Records and Information

1. All records and analysis by any and all school districts confirming that the Attorney General’s office has verified compliance of all Central Appraisal Districts (CADs), including but not limited to Denton CAD, with Title 18 U.S.C. §1512.
2. All records confirming the Attorney General’s enforcement authority over CADs and supporting documentation regarding the Comptroller’s statutory authority over property tax administration.
3. All records describing the Attorney General’s audit processes for:

- a. Oversight of the State Comptroller's administration of property tax.
 - b. Oversight of school districts' preparation and advertising of bonds.
4. All records confirming enforcement authority held by TALCB and TDLR over CADs, including license revocations or disciplinary actions from 2017–2025.
5. All records describing complaint resolution processes, timelines, and case files at the Attorney General's office, TDLR, TALCB, and the State Comptroller.
6. All records confirming that CADs operate under Texas law, the Attorney General's standards, the Comptroller's requirements, USPAP, IAAO, TAAO, TAAD, and other applicable professional and statutory frameworks.
7. All records of complaints investigated and resolved by the Attorney General regarding:
- a. Appraisal Review Boards being told they cannot consider prior year values.
 - b. Registered Professional Appraisers at CADs committing aggravated perjury.
 - c. CADs using software or methods not compliant with USPAP, Texas Property Tax Code, or constitutional requirements.
8. All records verifying whether any County Commissioner has appointed CAD board members outside statutory authority.
9. All records confirming Attorney General oversight of market value increases, property assessments, and bond financing impacts, including market valuation studies from 2017–2025.
10. All records related to Denton County and other Texas counties regarding home affordability analysis, including income-to-value ratios, CAD certified values, and market affordability comparisons from 2017–2025.
11. All records of audits or opinions by the Attorney General regarding alleged data manipulation or fraudulent practices at CADs, including but not limited to Denton Central Appraisal District (DCAD).
12. All records of Attorney General review of Property Value Studies (PVS) conducted by the Texas Comptroller, including communications with Independent School Districts, from 2017–2025.
13. All records or opinions by the Attorney General related to allegations of conspiracy, fraud, RICO violations, and oath of office violations by CAD officials or appraisers.
14. All records confirming enforcement of Section 42.26 of the Texas Property Tax Code (Remedy of Unequal Appraisal).
15. Audit Standards and Oversight Records

All records, reports, communications, and evaluations prepared or reviewed by the Attorney General's office concerning the verification of appraisal district compliance with required audit and appraisal standards, including but not limited to: the Uniform Standards of Professional Appraisal Practice (USPAP, Standard 5 – Mass Appraisal), Texas Property Tax Code appraisal and reappraisal requirements, the Property Value Study (PVS), the Methods and Assistance Program (MAP) reviews, and ratio studies conducted by the Texas Comptroller.

This request includes any records reflecting the Attorney General's role in reviewing or relying upon these audit mechanisms, as well as any findings of deficiencies, irregularities, or noncompliance by Central Appraisal Districts.

CRITICAL SITUATION OVERVIEW

Systemic Texas Municipal Bond Fraud: Request for Immediate Government Action

A comprehensive investigation has uncovered systematic municipal bond fraud across Texas, mirroring the SEC's successful 2022 prosecution of Crosby Independent School District. The evidence reveals a statewide pattern of fraudulent property valuations and bond misrepresentations that threatens both state financial stability and national municipal bond market integrity.

DOCUMENTED FRAUD PATTERN

Crosby ISD Precedent (SEC 2022):

- \$20 million bond issuance based on falsified financial statements
- \$11.7 million in concealed liabilities
- Federal prosecution confirmed local oversight failures

Current Systemic Evidence:

- 15+ years of compound fraudulent bond practices
- \$2.3 billion Celina ISD bond for 8,700-household community
- Mathematical impossibility of debt repayment creating insolvency
- Direct impact on federal securities markets and mortgage-backed securities

Production format & search details

- Please search and produce in **electronic form**: emails in **PST/mbox** (with metadata), documents/spreadsheets in **native formats** (DOC, DOCX, XLSX, CSV), and scans as OCR'd PDFs.
- For messages, include **To/From/CC/BCC, date-time, subject, and attachments**.
- If any records are withheld, provide a **Vaughn-style index** (or Texas equivalent) identifying the legal basis for each withholding.
- If you anticipate costs exceeding **\$100**, please provide a **written good-faith cost estimate** and pause processing to allow narrowing.
- If certain requests are better answered by **Comptroller, TDLR, TALCB, a CAD, or TEA, Bond Review Board** please **forward** under TPIA or promptly advise so we can directly request from the proper custodian.

A. Timeframe, custodians, and scope

Please search **January 1, 2017 through the date you conduct each search** across these OAG custodians/offices (add or exclude as appropriate):

- Office of the Attorney General: Executive, Civil Litigation, Open Records Division, Opinion Committee, Financial Litigation/Tax, Criminal Investigations, Governmental Relations, and any special task forces or working groups touching property tax, school finance/bonds, TDLR/TALCB liaison, or CAD oversight.
- Any OAG liaison to the **Texas Comptroller, TDLR, TALCB, or Texas Education Agency** on property-tax, appraisal, or school-bond matters.
- Any OAG retained outside counsel or contractor advising on these subjects.

If responsive records exist outside these custodians, please include them or promptly advise so we can refine.

B. Definitions (plain-English)

“Document/record” includes emails, letters, memos, reports, spreadsheets, presentations, notes, calendars, text/IM messages, Teams/Slack/Signal/WhatsApp content, recordings/transcripts, data extracts, dashboards, attachments, videos, press releases, and draft materials preserved under Texas retention rules. “CAD” includes any Central (or County) Appraisal District and the Appraisal Review Board (ARB). “Verification/confirmation” is satisfied by **documents sufficient to show** the requested fact, policy, finding, analysis, or communication existed.

C. Requests (organized and narrowed)

1) OAG authority, roles, and enforcement

1.1. All OAG **policies, manuals, memos, training, or guidance** describing OAG authority (if any) over **Central Appraisal Districts** or ARBs, including references to Texas Property Tax Code, Texas Constitution, or federal law.

1.2. **Documents sufficient to show** OAG’s view of the **Texas Comptroller’s role** in “State administration of property tax,” including organizational charts or MOUs with OAG.

1.3. Any **OAG enforcement authority analyses** regarding CADs, **TALCB**, or **TDLR** (e.g., who enforces what, and when OAG intervenes).

1.4. OAG procedures/guidelines for **intake, triage, referral, and resolution timelines** of complaints involving CADs, TDLR, TALCB, and the Comptroller (include service-level targets or metrics, if maintained).

1.5. Documents sufficient to show whether OAG prescribes or audits **software conformance** for CADs (USPAP, Texas Property Tax Code, etc.), or whether another agency does so.

2) Audits, reviews, or investigations (CADs, Comptroller, school districts)

2.1. **All OAG audits, investigations, reviews, or assessment reports** (including workpapers and closure memos) that evaluated whether the Comptroller “oversaw the administration of property tax” in accordance with Texas law.

2.2. Same as 2.1, as to **school district administration** relating to **bond preparation, advertising, or compliance** obligations.

2.3. **Complaints, referrals, or enforcement case files** (closed or open status sheets; redact PII as needed) involving **CAD appraisal practices, ARB conduct, or appraisal software** since 2017.

2.4. Any OAG files analyzing or addressing alleged **manipulation of appraisal data** inside a CAMA or appraisal system (including the October 12, 2023 DCAD board-meeting matter).

2.5. Any OAG files analyzing whether **mobile homes or specific residential/commercial parcels** were appraised outside USPAP, Property Tax Code, or constitutional constraints, including any **post-ARB valuation reversals** or data rollbacks.

3) Criminal statutes / obstruction / RICO references

3.1. **Internal OAG legal memoranda, issue briefs, or emails** that analyze potential application of **18 U.S.C. § 1512** (obstruction) to CAD data retention or alteration, including any per-district, per-CAD, or per-ISD analyses, if they exist. All records, including but not limited to internal audits, legal memoranda, reports, or communications with any federal agency, reflecting the Attorney General’s review, verification, or enforcement actions to ensure that Central Appraisal Districts (CADs) or their employees have complied with Title 18 U.S.C. §1512. This request seeks any records documenting the OAG’s statutory duty to oversee, verify, or act on allegations of obstruction of justice or destruction of records within Texas property tax administration, regardless of whether such a record is consolidated by school district.

3.2. Any **OAG guidance** referencing **Texas or federal RICO** exposure for appraisal, ARB, or school-bond related conduct.

3.3. OAG communications with **criminal justice units or prosecutors** regarding alleged **aggravated perjury** by Registered Professional Appraisers employed by CADs. All records of complaints, including the complaint filing, investigation records, and final resolution documents, that were investigated or reviewed by the Attorney General from January 1, 2017 through August 1, 2025 concerning any of the following:

- a. Allegations of perjury or providing false information by a Registered Professional Appraiser;
- b. Allegations that a CAD used software, algorithms, or appraisal methods not compliant with USPAP or the Texas Property Tax Code.

If the office determines that searching all responsive records from this period would be unduly burdensome, we request that you provide a specific, justified statement of the burden and a good faith estimate of a reasonable scope (e.g., a specific year, county, or a keyword search) that would satisfy the request, as per the Texas Public Information Act.

4) Due process, equal & uniform, and ARB evidentiary standards

- 4.1. OAG opinions, memos, or guidance regarding the **Fifth Amendment due process** as applied to property appraisal/ARB proceedings.
- 4.2. OAG materials interpreting **Texas Constitution “Equal & Uniform”** clauses in appraisal contexts.
- 4.3. Documents sufficient to show OAG’s position on ARB **evidentiary burdens**, including when **prior-year settled values** may/should be considered, and when **“clear and convincing evidence”** is met or not met.
- 4.4. Any OAG materials discussing **Texas Tax Code § 42.26** “Remedy of Unequal Appraisal,” including examples or guidance (if maintained).

5) Comptroller Property Value Study (PVS) and mass appraisal standards

- 5.1. OAG analyses or correspondence concerning how the **Comptroller’s PVS** or **95%–105% confidence interval** influences CAD reappraisals or ISD funding; include any assessment of **USPAP Standards Rules 5-1(b) and 5-1(c)** compliance by CADs.
- 5.2. Communications between OAG and **bond rating agencies**, or with **ISDs**, about **PVS outcomes**, appraisal levels, or impacts on **school debt/bonds**.
- 5.3. Any OAG documents assessing whether **“blanket statements” of value increases** (e.g., TAAD 3/17/2022 guidance citing 20–50% increases) affected **ARB hearings, taxpayer rights, or bond-market disclosures**.

6) Conflicts, governance, and board composition

- 6.1. OAG records concerning **county commissioners’ involvement** in CAD board appointments (including rules to prevent “hand-picking”).
- 6.2. Analyses on how expanding a CAD board (e.g., adding three members to a six-member panel) affects **quorum, voting, or legal sufficiency** of decisions.

6.3. Any **OAG ethics/conflict-of-interest reviews** for CAD board members, chief appraisers, or tax assessor-collectors (2017–present).

7) Licensing and discipline (TDLR / TALCB)

7.1. OAG communications with **TDLR** and **TALCB** regarding **licensing authority, revocation powers, or enforcement** over CAD employees/contract appraisers.

7.2. Documents sufficient to show any **license revocations, suspensions, or significant disciplinary actions** (2017–present) involving **Denton Central Appraisal District** personnel.

7.3. OAG records addressing whether **data manipulation** by licensed or unlicensed CAD personnel violates law or license conditions.

8) Data integrity, falsification, and retention

8.1. OAG documents addressing **falsification** of tax rolls, income/expense statements, sales/ratio data, or appraisal model inputs by any CAD; include **retention and purging** policies and any **litigation holds**.

8.2. Any **OAG audits or sampling reviews** comparing **assessed vs. market values** across multiple CADs for accuracy (2017–present).

8.3. **Records sufficient to show** whether OAG has taken steps to **ensure no CAD purged property files/working papers** outside retention schedules.

9) School-bond communications and risk

9.1. Communications between OAG and **ISDs or rating agencies** that address **bond risk, default probability calculations**, or whether appraisal levels influenced bond-offering disclosures.

9.2. OAG files, if any, analyzing the reported **2023 single-family total market value increases** (e.g., +\$28.89B; +23.73% YoY; +22.28% in 2022) and whether such levels affected **ISD financials** or **public disclosures**.

9.3 OAG files, including spreadsheets and analysis featuring the mathematical formulas and calculations used by OAG staff showing the effects of compound interest on bonds raised for each school district.

9.4 Communications between OAG and State Comptroller that address bond risk, default probability calculations, or whether appraisal levels influenced bond offering requirements and disclosures.

9.5 Communications between OAG and banks financing the bonds, and bond underwriters, that address bond risk, default probability calculations, or whether appraisal levels influenced bond offering requirements and disclosures.

9.6 Communications between OAG and banks financing the bonds, and bond underwriters, that address bond risk, default probability calculations, or whether outstanding interest and bond reduction (if any) influenced the requirement for additional bond offerings.

10) Specific Denton County items (illustrative exhibits in requester's possession)

10.1. OAG records referencing the following Denton County topics (any of which may appear in complaints, investigations, liaison notes, or agency-to-agency communications):

- **Home-affordability ratios** and appraisal alignment for 2021 vs. 2023 (median income ~\$96,265 vs. ~\$109,126; average & median value deltas).
 - **DCAD Board Meeting 10–12–2023** (alleged spreadsheet export/alteration/re-load to CAMA).
 - **Mavex Shops of Flower Mound** valuation reduction on 7/19/2023 and the 8/24/2023 CSV extract showing a later increase.
 - Targeted revaluation allegations (e.g., **Aubrey**) linked to **PVS** conformity.
- For each subtopic, provide complaints, emails, memos, analyses, and closure documents, if any.**

Note: We are not asking OAG to create new analyses or answer hypotheticals. We seek **existing records** reflecting policies, communications, decisions, data, and findings.

11) OAG audits, reviews, or investigations of ISD bond compliance or CAD appraisal practices (2017–present)

11.1. **Independent School District Auditors** “Records identifying accounting firms engaged by Texas ISDs for bond audits, including qualifications, CFE certifications, and scope-of-work documents.”

11.2. **Bond Disclosure & Risk Assessments** “All communications between OAG, ISDs, and rating agencies regarding bond repayment capacity, appraisal roll values, or risk of default (2017–present).”

11.3. **Comptroller PVS & Manipulation** “OAG documents analyzing or commenting on whether CADs manipulate appraisals to align with the Comptroller’s Property Value Study (PVS).”

11.4 Data Integrity / Falsification “Complaints, referrals, or OAG files addressing falsification, alteration, or selective disclosure of CAD appraisal data used for ISD funding or bond disclosures.”

11.5. Firewalls & Accountability Gaps “OAG analyses, memos, or correspondence discussing responsibility (or lack thereof) for reconciling ISD bond disclosures with CAD appraisal data.”

11.6. Auditor Limitations “Any OAG memoranda or correspondence recognizing that ISD-retained auditors rely solely on district-provided data, without independent verification.”

12) Godley ISD bond proceedings, approvals, and related oversight (2017–present)

Please provide the **Public Finance Division** records reflecting the Attorney General’s **review, approval, and related correspondence** for **Godley ISD public securities** since 2017, including any **deficiency letters, legal opinions, transcripts, and communications with bond counsel/underwriters/rating agencies**. Has the Attorney General received **complaints or conducted any inquiry** concerning **scope changes** publicly reported by the Godley district (e.g., postponement of roof/HVAC work), please produce those files as well.

12.1. Public Finance Division (PFD) “record of proceedings” files for any Godley ISD public securities (bonds/notes/obligations) submitted for **Attorney General review and approval** under Government Code **Ch. 1202** (and related provisions), including: the issuer’s transcript, certificate(s), approving opinion/letter, deficiency/hold letters, checklists, closing correspondence, and any **A.G. approval letter and legal opinion delivered to the Comptroller**.

12.2. PFD correspondence (emails/letters/IMs) with Godley ISD, its **bond counsel, underwriter(s), municipal advisor(s), trustee, or rating agencies** regarding **legal sufficiency, disclosure concerns, or conditions** for approval of Godley ISD bonds since 2017. (Native format with attachments.)

12.3. Any internal PFD issue memos, routing slips, or review notes that discuss (a) **scope changes** or postponements reflected in district bond updates; (b) whether such changes affected the **legal basis** for issuance/validation or **continuing disclosure** expectations.

12.4. Complaints, referrals, or investigations (open/closed status sheets OK; redact PII as needed) received by OAG alleging **misrepresentation, omission, or falsification** tied to **Godley ISD bond programs** or related **appraisal/tax base representations** (2017–present).

1) Open Records Division files (if any) involving Godley ISD bond program disclosures or related appeals/rulings.

Context for search (non-directive): The district’s own updates discuss **postponing roofs/HVAC and other items** while moving ahead with large facilities, which may have generated correspondence or questions during bond processing.

(See district's "2021 Industry Update" noting delayed **roof and HVAC replacements** and a **practice gym**, and the "2022 Update" reiterating postponed **aging systems** and other items.)

Custodians/Units to search:

Public Finance Division (all reviewers/attorneys),

Opinion Committee (if consulted),

Governmental Relations (if rating-agency/legislative liaison involved),

Criminal Investigations (complaints triage, if any), Open Records Division.

2) To Godley ISD including Public Information Officer - Bond Program, Scope Changes, Disclosures & Advertising

Records Requested:

A) **Bond program files** for the May 2021 authorization and any subsequent issuances: board agenda packets/minutes, voter information materials, **official statements**, pre-election, post-election implementation plans, budget tables, and **owner's rep/CMAR/GMP** documents.

B) **Scope reprioritization** records tied to the District's public **2021 and 2022 Industry Updates**—including **value engineering logs, scope reduction matrices, and all change orders** that postponed or removed **roof/HVAC/system replacements** and other repair items.

C) **Monthly pay applications, cost reports, and contingency logs** for Pleasant View Elementary, HS Phase 2, and HS Phase 3 (as referenced on the bond site), and any **variance reports** comparing original vs. current scope.

D) **Communications (emails/letters/IMs)** between the District and its **bond counsel, municipal advisor, underwriter(s), rating agencies, and trustee** concerning:

- projected **tax base/appraised values**;
- **ability to pay/debt service capacity**;
- market or rating considerations tied to **PVS** results or tax rate discussions. (Include attachments.)

E) **Continuing disclosure** submissions and **material event notices** provided to EMMA (MSRB) for Godley ISD since 2017, including drafts and board approvals.

F) Any **internal/external memoranda or presentations** explaining why "critical repairs" were postponed, the **criteria for prioritizing facilities** vs. repair scope, and any community communications plan.

G) **Public information contained in contractor and architect records** related to the District's bond contracts (held on the District's behalf). (If some records are in vendor custody, please retrieve or identify the contract clause you rely on regarding access.)

3.) Texas Comptroller — PVS & Godley ISD Interactions via Public Information
Coordinator, Texas Comptroller of Public Accounts — Records of Godley ISD and PVS (Jan. 1, 2017–present), study results, appeals, and communications.

Records Requested:

- A. **PVS outcomes** for Godley ISD and any **ISD communications/appeals** concerning study findings, including valuation worksheets, confidence intervals, and **final certifications** affecting Godley ISD (2017–present).
- B. **Emails/letters** between the Comptroller and **Godley ISD** (or its agents) about the relationship between **PVS results** and **bonding capacity/tax base** estimates used in offering documents.
- C. Any **Comptroller memoranda** addressing whether district **scope changes** (e.g., postponing repairs) intersected with **PVS findings** or local tax-rate planning.

13) Energy Agreements: Texas Comptroller via Texas State Comptroller; please search and deliver all records of all **off balance sheet lease purchase agreements** executed by school districts across the State of Texas between 1999 and 2025 and evidence that the net cost to the taxpayer is zero.

13.1. Deliver evidence of the **current outstanding debt** that needs to be serviced regarding all Energy Savings Performance Contracts (ESPC).

13.2. How much money have the school districts **used from their O&M budget** to cover the shortfall of the projected energy savings guaranteed in the terms of the Contract (ESPC)

13.3. Verify that the O&M (Operations and Maintenance) funds are derived from the tax receipts of the property owners.

13.4. The Attorney General may want to reference these school districts La Joya ISD, Paris ISD, Itasca ISD, Sheldon ISD which have refused to turn over the requested information by AG Paxton.

13.5. Verify that the opinion of the Attorney General is that the ESPC Contracts remain binding within the statute of limitations until the last payment is made.

13.6. Verify that the School Districts are not authorized under law to guarantee any financial liability.

13.7. Verify that Method and Verification Protocol Contract was maintained through the term of the lease purchase agreement with the third-party financing institution.

13.8. Please provide a list of the underwriters and banks that provided the funding for the Energy Contracts (ESPC). Were these banks and underwriters authorized by the State to provide the funding?

13.9. Please provide confirmation of the Lease Purchase Agreements that went beyond the term of the Agreement. Please provide confirmation of how many school districts extended the length of the term of the Agreement. Please provide confirmation that the Attorney General or State Comptroller authorized the extension. Please provide the termination of the Energy Developer(s) guarantee from the Agreements.

13.10. Please Provide verification that the school districts perform due diligence with a competitive bid process for the ECPC. Provide the competitive bids from any of the above school districts.

14) 313 Tax Abatement Agreements: Please provide verification of who gave the school districts the authority to sign a **313 Tax Abatement Agreement(s)** without a taxpayer approval or vote?

14.1. Please provide verification by the Attorney General that the taxpayers received proper due process with regard to the 313 Tax Abatement Agreements (solar field farms).

14.2. Please provide verification that there was an independent lawyer representing the taxpayers in negotiations over the 313 Tax Abatement Agreements and who were they. Please provide verification that a law firm representing the school districts cannot represent the taxpayers.

14.3. Please provide verification that Mr. Paxton the Attorney General has copies of the letter (April 13th, 2023) submitted to the Itasca ISD by Mr. Jeff Mashburn requesting the District and it's Board state their knowledge and expertise in negotiating the 313 Agreements. Please provide verification that Mr. Paxton is aware that no response from the school district has every been made to the letter by the school district or it's attorneys.

14.4. Please provide verification that the Texas Attorney General oversee the actions and responsibilities of the Texas State Comptroller who is promoting and responsible administratively for the 313 agreements.

14.5. Please provide the documentation that states and or shows that the State Comptroller is the party responsible in law for the 313 Agreements.

14.6. Please provide the documentation that shows who has the authority to determine the negotiation points of the tax abatement amount such that one school district receives less value than another school district.

14.7. Please provide the legal standard from the State Comptroller that ensures the taxpayers receives the best and most consistent benefit for the taxes paid. Please provide confirmation that the school board, who signed an Oath of Office, is accountable directly to the taxpayers.

14.8. Please provide evidence that the Attorney General is aware that million of dollars were paid to lawyers and consultants to negotiate the 313 Agreements even though the School Board had the authority and clearly have a lack of knowledge. Please provide evidence that the Attorney General and State Comptroller did not shift liability to the school district superintendents and the school district boards.

14.9. Please provide the check register or ledger that shows how much State Matching Funds are received from each of the school districts involved in the 313 Agreements.

14.10. Please provide confirmation that the Attorney General prohibited the school districts from treating property owners differently than the 313 Agreement participants such that farm land values are disparate and not uniform and equal under the Texas Constitution.

14.11. Please provide evidence that the Attorney General is in agreement or not in agreement with regard to the depreciation schedule used by the 313 Agreements wherein a 10 year depreciation schedule is allowed as compared to the component of a farm or house which do not receive such benefit. Please provide comment on the position of the Attorney General if the depreciation schedules from the 313 solar filed owner operator is different than that stated to the IRS.

14.12. Please provide evidence that the Attorney General did not agree to allow school districts (superintendents and or school board members or trustees) to allow favoritism (bias) to certain landowners to relieve them of this tax liability and to burden other tax landowners with excess property taxes in the State of Texas.

14.13 Please search and provided any emails/letters recognizing that any school district has the authority to issue a 10 year guarantee for collateral in the financing of the 313 Agreements with regard to the solar fields. Please provide evidence that the Attorney General agrees that the 3rd party implicit guarantor is the property owners of the State of Texas and they have no knowledge and did not give their authority to be a guarantor of any solar field developer.

14.14 Please search and provide any Emails/letters between the OAG and the Texas State Comptroller authorizing "Investment Pools" as denoted on school districts balance sheet. Said information should include who paid into the Investment Pool, tenure, what are the terms, name the financial firm that is operating the investment pool(s), fee agreements, term, anticipated proforma and return on investment, and investments made.

Fee, narrowing, and rolling productions

We consent to **rolling productions**. If any item is broad, please propose a **reasonable narrowing** (e.g., custodians, keywords, or a shorter date range), and we will confer immediately.

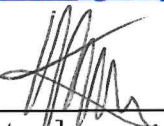
Preservation

To the extent not already in place, please **preserve** potentially responsive records (including texts/IMs and cloud files) during the pendency of this request.

If production exceeds 10 business days, please send the date you reasonably expect to release (per OAG guidance).

Contact

Mitchell Vexler, President G.P.
Mavex Shops of Flower Mound LP
& Mockingbird Properties
1913 Justin Road Suite 117
Flower Mound, Texas 75028
Tel. 214-725-9013
Email: mitch@mockingbirdprop.com
www.mockingbirdproperties.com/dcad


[Signature]

See Exhibit "A" below for reference documents

Exhibit A

These are contextual topics so OAG can match them to any complaints or inter-agency communications on file without forcing OAG to answer questions.

- A.) Denton Central Appraisal District (and other CADs) perform software “work arounds” and manipulate the property tax value data; per Chief Appraiser Don Spencer, 60,000 properties were manipulated. Refer to DCAD Board Meeting Transcript Excerpt.

https://irp.cdn-website.com/39439f83/files/uploaded/10-12-23_BOD_meeting_-_manipulating_records-051524.pdf

- B.) Michelle French, Tax Assessor Collector, accepted fraudulent tax certification and was protected by Judge Eads.

https://irp.cdn-website.com/39439f83/files/uploaded/08-31-21_DCCC_Meeting_-_Vargas.pdf

- C.) Link to evidentiary documents. Who Benefited, How, Ramifications – Insolvent Bonds

<https://irp.cdn-website.com/39439f83/files/uploaded/Ramifications+-+Insolvent+Bonds-082025-504pm.pdf>

- D.) Denton County Home Affordability Review 2023

<https://irp.cdn-website.com/39439f83/files/uploaded/Tab%203-Home%20Affordability%202023.pdf>

- E.) Review of DCAD Certified Total Reports 2017–2023

https://irp.cdn-website.com/39439f83/files/uploaded/Review_Certified_Totals_2017-2023-Over_Value-Tax-051624.pdf

- F.) Congratulated for Passing Property Value Study and being “masters of guessing”

https://irp.cdn-website.com/39439f83/files/uploaded/02-15-24_BOD_Meeting_-_PVS_results_-_masters_of_guessing.pdf

- G.) Review of Aubrey ISD SF Residential Property Value Increase (effect of PVS)

<https://irp.cdn-website.com/39439f83/files/uploaded/Compare%20Cert%20Vals%20DC%20vs%20AubreyISD%202018-2023-103023.pdf>

- H.) www.mockingbirdproperties.com/dcad

- I.) www.commonsenselaw.org