## ANALIESE KORNELY

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September 10, 2010

The Honorable Larry Taylor Texas House of Representatives Texas State Capitol, Room E2.610 P.O. Box 2910 Austin, Texas 78768

Re: Request for Information

Dear Representative Taylor:

Pursuant to the state open records law (Chapter 552, Government Code), I am writing to request copies of any and all of the information, contained in any medium, requested below. As you know, under Section 55.002, Government Code, the law applies to recorded information in practically any medium, including paper; film; a magnetic, optical, or solid state device that can store an electronic signal; tape; Mylar; linen; silk; and vellum. These mediums include, without limitation, information in a book, paper, letter, document, printout, photograph, film, tape, microfiche, microfilm, photostat, sound recording, map, and drawing and a voice, data, or video representation held in computer memory.

Request is made for the following information:

- 1. Any and all documents and/or communications concerning the September 8, 2010 letter you sent Jim Oliver with TWIA;
- 2. Any and all documents and/or communications to or from any person or entity relating to whether or not you should draft and/or send your September 8, 2010 letter to Jim Oliver with TWIA;
- 3. Any and all documents and/or communications concerning a coordinated or cooperative effort by any of the following individuals and/or entities regarding how to obtain records from TWIA in order to intimidate Democratic donors; Mike Hull, Cynthia Lawson, Texas Watchdog, The Patriot Group, Texans for Lawsuit Reform, and/or Richard Trabulsi;
- 4. Any and all documents and/or communications concerning Mike Hull and/or Hull, Henricks & Macrae;
- 5. Any and all documents and/or communications concerning Cynthia Lawson;
- 6. Any and all documents and/or communications concerning Texas Watchdog;
- 7. Any and all documents and/or communications concerning The Patriot Group, or

any of the individual principals with The Patriot Group;

- 8. Any and all documents and/or communications concerning Texans for Lawsuit Reform;
- 9. Any and all documents and/or communications concerning Richard Trabulsi;
- 10. Any and all documents and/or communications concerning Todd Hunter;
- 11. Any and all documents and/or communications concerning Clyde Alexander;
- 12. Any and all documents and/or communications concerning the Back to Basics PAC;
- 13. Any and all documents and/or communications concerning the Back to Basics PAC advertisement criticizing Governor Rick Perry regarding his actions and inactions relating to insurance companies that began airing on the same day you authored your September 8, 2010 letter to TWIA;
- 14. Any and all documents and/or communications concerning Steve Mostyn, Amber Anderson Mostyn, any other shareholder, employee, agent, or client of the Mostyn Law Firm and/or the Mostyn Law Firm;
- 15. Any and all documents and/or communications concerning the Joint Windstorm Insurance Oversight Board;
- 16. Any and all documents and/or communications with any member of the Joint Texas Windstorm Insurance Oversight Board, the Office of the Lt. Gov., the Office of the Speaker of the Texas House, and/or the Office of the Governor, relating to requesting information from TWIA on Steve Mostyn, Amber Anderson Mostyn, any other shareholder, employee, agent, or client of the Mostyn Law Firm and/or the Mostyn Law Firm;
- 17. Any and all documents and/or communications with any member of the Joint Texas Windstorm Insurance Oversight Board, the Office of the Lt. Gov., the Office of the Speaker of the Texas House, and/or the Office of the Governor, relating to requesting records from TWIA;
- 18. Any and all minutes and/or notes from meetings of the Joint Texas Windstorm Insurance Oversight Board;
- 19. Any and all schedules and/or calendars for the Joint Texas Windstorm Insurance Oversight Board;
- 20. Any and all documents and communications regarding any commission you or any business in which you own an interest receives from TWIA on TWIA policies;
- 21. Any and all documents and communications discussing why and how commissions you receive on TWIA related business exceed the customary 10% for original policies and 5% for renewals paid to other agents;

In order to narrow this request and reduce the burden on you while ensuring we can obtain what documents we believe are relevant, I am stipulating that the time period for this request only includes any and all documents and/or communications from May 1, 2010, through the date of this request, inclusive.

In addition to all information responsive to this request held by you on state-owned computers, computer systems, or networks or otherwise maintained in your Capitol and district offices or other state-owned offices, I am also requesting all responsive

documents that were originated through, received by, or maintained on all other private computers available for your use, or the use of anyone acting under your direction, advice, counsel, or suggestion, that were sent to or from you or anyone acting under your direction, advice, counsel, or suggestion using private e-mail accounts, including, but not limited to, and/or were communicated by telephone or text message to or from any of your private business telephone numbers at Truman Taylor Insurance Agency or your cell phone at As September 8, 2010, letter and your other communications on the subjects referenced above were made under color of your official position and in connection with the transaction of official business, this request is specifically made for any communications of that same subject matter made on the above non-government managed accounts.

I agree to pay any reasonable copying and postage fees of not more than \$150. If the cost would be greater than this amount, please notify me. Please provide a receipt indicating the charges for each document.

As provided by the open records law, I will expect your prompt prompt production of the responsive documents, but in any event, not later than the tenth business day after today. If you choose to deny this request, please provide a written explanation for the denial including a reference to the specific statutory exemption(s) upon which you rely. Also, please promptly provide all responsive material that can be redacted or is otherwise segregable.

Please be advised that I am prepared to pursue whatever legal remedy necessary to obtain access to the requested records. As you are well aware, that violation of the open records law can result in a fine of up to \$1,000, imprisonment of up to six months, or both under Section 552.353(e), Government Code. In addition, litigation costs and reasonable attorney fees may also be assessed against you under Section 552.323, Government Code.

Finally, because time is of the essence, please communicate with me by e-mail to my e-mail address as indicated on the first page of this letter. Thank you for your prompt attention to and assistance with this important matter.

Sincerely,

Analise Kornely