

Mr. Edwin Sullivan, Esq.

ID: SPIR-2017-TX-0004

c/o Management and Training Corporation

Oberti Sullivan LLP

712 Main Street, Suite 900

Houston, Texas 77002

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Sent via: Electronic mail

April 4th, 2017

Mr. Edwin Sullivan,

Under the Texas Public Information Act, §6252-17a et seq., I am requesting an opportunity to obtain copies of records that Management and Training Corporation has, and records that the Oberti Sullivan LLP and the Taylor and Taylor Law, P.C have on behalf and as to Management and training Corporation. I hereby request the following:

1. All written communication, including but not limited to emails, in which were received by Management and Training Corporation¹ from the Oberti Sullivan LLP and the Taylor and Taylor Law, P.C as to Isaiah Smith;
2. All written communication, including but not limited to emails, from individuals employed and contracted by the Taylor and Taylor Law, P.C to individuals employed and contracted by the Oberti Sullivan LLP as to Management and Training Corporation and Isaiah Smith;
3. All written communication, including but not limited to emails, from individuals employed and contracted by the Oberti Sullivan LLP to individuals employed and contracted by the Taylor and Taylor Law, P.C as to Management and Training Corporation and Isaiah Smith;
4. A copy of the Oberti Sullivan LLP and the Taylor and Taylor Law, P.C contract with Management and Training Corporation;
5. A copy of all thought of² legal strategies that Management and Training Corporation, the Oberti Sullivan LLP and the Taylor and Taylor Law, P.C were planning on using in the closed District Court Case of Isaiah Smith v. Management and Training Corporation, Case No. 4:16-cv-00176;

¹ A for profit prison corporation in which is contracted by and through the Texas Department of Criminal Justice as to performing governmental functions;

² Everything that comes to your minds, please write it down and send to me;

6. A copy of all emails from aclark@osattorneys.com and lgreer@osattorneys.com to Management and Training Corporation;
7. A copy of all emails from Management and Training Corporation to aclark@osattorneys.com and lgreer@osattorneys.com;
8. All emails from attorneys and non-attorneys of the Oberti Sullivan LLP and the Taylor and Taylor Law, P.C to Management and Training Corporation and all written communication in which is not protected by attorney client privilege from the Oberti Sullivan LLP and the Taylor and Taylor Law, P.C to Management and Training Corporation and by Management and Training Corporation to them;
9. All records that is in regards and pertaining to billing and expenses of the Oberti Sullivan LLP and the Taylor and Taylor Law, P.C with Management and Training Corporation;

As you may already know, Management and Training Corporation is a Utah based Corporation that conducts business in the State of Texas. Management and Training Corporation have a contract with the Texas Department of Criminal Justice as to running the Bridgeport Correctional Center in Bridgeport, Texas. Management and Training Corporation employs individuals as correctional officers to perform governmental functions inside of their operated prisons.

Please note that virtually all of the information that is in a governmental body's physical possession constitutes public information that is subject to the Act. Id. § 552.022(a)(1); see also Open Records Decision Nos. 549 at 4 (1990), 514 at 1-2 (1988). The Act also is applicable to information that a governmental body does not physically possess, if the information is collected, assembled, or Page 2 of 3 maintained for the governmental body, and the governmental body owns the information or has a right of access to it. Gov't Code § 552.002(a)(2); see also Open Records Decision No. 462 at 4 (1987).

I would like to request a waiver of all fees in that the disclosure of the requested information is in the public interest and will contribute significantly to the public understanding of the way in which the government operates, Management and Training Corporation, activities of Management and training Corporation and et cetera. Members of the public have a legitimate interest as to Management and Training Corporation in which is a for profit private prison corporation that conducts business in the State of Texas.

The Texas Public Information Act requires that you "promptly produce" the requested records unless, within 10 days, you have sought an Attorney General's Opinion. As provided by the Texas Public Information Act, I will expect your response within ten (10) business days. Twenty (20) days if my request requires substantial programming or manipulation of data. See Tex. Gov't Code Ann. Secs. 552.221(d) and 231(c). If you expect a significant delay in responding to this request, please contact me with information about when I might expect copies or

the ability to inspect the requested records. You can reach me via email at: iscampaign@usa.com.

If you deny any or all of this request, please provide a written explanation for the denial and cite each specific statutory exemption(s) you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law. If your "governmental body" wants to seek the Attorney General's Opinion regarding any of our request, I ask that you immediately notify me and then seek a formal decision from the Texas Attorney General not later than ten (10) calendar days from your receipt of this request, as required by the Texas Public Information Act. See Sec. 552.301. I would then ask your governmental body to release to me all of the items in which you have not sought the Attorney General's Opinion on. See Sec. 552.301, 302; see also Open Records Decision No. 664 (2000)(if a governmental body concludes that no exceptions apply to the requested information, it must release the information as soon as possible).

As you may already know 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. See Tex. Gov't Code Ann. Sec. 552.353(e). Litigation costs and reasonable attorney fees may also be assessed against you. See Sec. 552.323.

I would prefer to receive all of the requested information to me by email. My email address is at: iscampaign@usa.com. You can also send me my requested records by mail at the following mailing address:

Isaiah X. Smith

Isaiah Smith Campaign

P.O Box 163411

Fort Worth, Texas, 76161



Respectfully,

Isaiah X. Smith

Isaiah Smith Campaign

P.O Box 163411

Fort Worth, Texas, 76161

www.isaiahxsmith.com