
April 15, 2019

Harris County District Court
P.O. Box 4651
Houston, TX 77210

RE: Open Records Request; Proposed settlement documents provided to the Houston Chronicle regarding the ongoing federal bail lawsuits (O'Donnell vs Harris County)

To Whom It May Concern:

I would like to request the following open public records:

1. A copy of the settlement documents that were provided to the Houston Chronicle, which specifically reflect that defendants will be provided free cell phones, child care, and transportation to court;
2. Any records touching or concerning whether any ride-sharing companies were involved on consulted in this effort;
3. Any records touching or concerning whether electric scooters and/or electric bicycles were considered and/or approved as a transportation mechanism in order to significantly reduce carbon emissions thereby stopping the planet's ultimate and certain doom;
4. Any records touching or concerning consideration of whether a defendant will be treated unfairly and thus required to take Uber pool rather than upgrading to the Uber Black;
5. Any records touching or concerning whether defendants will be dehumanized unfairly and subjected to taking public transportation when their rich counterparts can simply drive to court, even though such policies will reduce carbon emissions thereby saving the planet;
6. Any records touching or concerning whether defendants will be able to port their numbers to the cell-phone provider that the judges will use to hand out free cell phones;
7. Any records touching or concerning the type of phones to be provided, and whether defendants will have a full choice of a variety of phones so that they may use Android or iPhone so as not be subjected to the situation of losing and/or having to re-download the appropriate apps necessary for the conduct of their lives and businesses;
8. Any records touching or concerning whether the transportation vendors will restrict the movement of defendants as far away from morally bankrupt locations such as houses of gaming, houses of ill-repute, and houses that serve fermented or distilled alcoholic beverages;
9. Any records touching or concerning whether ride-sharing vendors, the actual drivers, will be informed of the criminal records and/or pretrial risk assessment evaluation and score of the

- defendants who they are supposed to provide “free” services to, and whether such contract will allow for such employees to reject providing such services;
10. Any records touching or concerning which vendor will be providing the free cell phone service, whether defendants will have a fundamental right to choose their carrier or will be unethically forced to accept a service they would not otherwise accept, and any descriptions of any particular voice and data plans or packages that will be available to defendants;
 11. Any legal analysis or memorandums regarding consideration of whether preventative detention is an allowable regulatory exception to the right to bail in misdemeanor cases pursuant to *United States v. Salerno*;
 12. Any information touching or concerning the cost and contents of the Judges’ education campaign “to protect against renewed efforts to mislead or misinform the public;”
 13. Any records touching or concerning who the judges believe is behind the “efforts to mislead or misinform,” and thus who is the target of the education campaign;
 14. Any records touching or concerning the “curriculum for use in public schools” and the installation of “exhibits on bail reform in the lobby of the criminal courthouse, in the office of the County Court at Law Judges and the Harris County Jail”;
 15. Any records touching or concerning the costs of child care to be provided by the county;
 16. Any records touching or concerning why the cab drivers have been excluded in favor of ride sharing services and any information touching or concerning why it is appropriate to discriminate against the taxicab drivers in the implementation of this transformative criminal social transportation justice.
 17. Any records touching or concerning why rental car companies have been excluded from providing transportation services;
 18. Any records touching or concerning why a quality, nutritional lunch and perhaps even dinner will not be served free to defendants who are being provided cell phones, child care and transportation to the exhaustion caused by having to set everything up and yet still appear in court.

Thank you for your assistance.

DocuSigned by:

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Christopher Blaylock
Administrative Director
American Bail Coalition