



August 8, 2022

Sylvia Perez  
County Clerk  
835 East Levee Street, 3<sup>rd</sup> Floor  
Brownsville, Texas 7852-

**Via Email:** [Sylvia.Perez@co.cameron.tx.us](mailto:Sylvia.Perez@co.cameron.tx.us)

**Re: Request Under Texas Public Information Act**

Dear Ms. Perez,

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](mailto:acase@latinojustice.org).

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

**Documents Requested**

- 1) All calendar entries documenting meetings between employees of Cameron County and any representatives of SpaceX, The Boring Company, Paragon VTOL Aerospace, or Spaced Ventures. This request includes, but is not limited to, calendar entries documenting meetings between Benjamin Worsham and Pete Sepulveda Jr. with representatives of The Boring Company, as disclosed in the August 22, 2021 article in MyRGVNews available here: <https://myrgv.com/local-news/2021/08/22/spi-to-boca-chica-tunnel-musks-boring-company-floats-idea/>, and any subsequent meetings. For the purposes of this request, a calendar entry is any record documenting the scheduling, attendees, time spent, and topics of any meeting.
- 2) All documents presented at any of the meetings identified on the calendar entries above.
- 3) Any communications between employees of Cameron County and any representatives of The Boring Company, including but not limited to communications regarding the presentation made to Mr. Sepulveda and Mr. Worsham.
- 4) Any communications between employees of Cameron County and any employees or representatives of SpaceX.
- 5) Any communications between employees of Cameron County and Paragon VTOL Aerospace or Spaced Ventures.
- 6) Any communications between employees of Cameron County and any reporter or media outlet regarding the proposal to dig a tunnel between Boca Chica Beach and South Padre Island, including but not limited to communications with the Dallas Morning News, MyRGV.com, the Statesman, Yahoo News, Space Channel, or any other media outlet.
- 7) Any surveys, reports, presentations, proposals, or evaluations of the environmental impact of constructing an underground tunnel between South Padre Island and Boca Chica Beach.
- 8) Any documents setting forth the expected budget, schedules, and expected time to complete the construction of a tunnel between South Padre Island and Boca Chica Beach.



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](mailto:acase@latinojustice.org).

Thank you for your time and attention to this matter.

A handwritten signature in black ink, appearing to read 'Andrew Case', with a stylized, cursive-like script.

Andrew Case