



August 6, 2021

Texas Attorney General Ken Paxton
Office of the Attorney General
300 w. 15th Street
Austin, Texas 78701
Via Confirmed Email: kenneth.paxton@oag.texas.gov & Certified Mail

Cc: Ft. Bend County Commissioners Court
Attention: Custodian of Records and Ft. Bend County Judge K.P. George
401 Jackson Street
Richmond, Texas 77469
Via Confirmed Email: kp.george@fortbendcountytexas.gov ,
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commpct4@fortbendcountytexas.gov & Certified Mail

Dear Attorney General Ken Paxton and Ft. Bend County Commissioners Court,

**RE: NEXT WAVE STRATEGIES AND FORT BEND COUNTY'S COVID19 VACCINE
OUTREACH PROGRAM**

Dear Attorney General Ken Paxton,

I am an Attorney representing an organization in Fort Bend County named Freedom Matters Action Group, L.L.C. (registered in Texas). Previously, I submitted a FOIA request to the Ft. Bend County Commissioners Court regarding Next Wave Strategies and Fort Bend County's COVID19 vaccine outreach program, citing the Texas Public Information Act, Tex. Gov't Code §552.001 et seq. I requested an opportunity to inspect or obtain copies of public records concerning the following:

- 1. Communications between Ft. Bend County government, including the Ft. Bend County Commissioners Court and the entity, “Next Wave Strategies”.**
- 2. Records as to how “Next Wave Strategies” was chosen to implement a COVID 19 vaccine outreach program in an effort to increase Ft. Bend County vaccination rates.**
- 3. Bidding records as to how “Next Wave Strategies” bid for the contract to implement a COVID19 vaccine outreach program, in an effort to increase Ft. Bend County vaccination rates.**
- 4. Bidding records for other entities besides “Next Wave Strategies” who also submitted bids for the COVID19 vaccine outreach program.**
- 5. Records as to how much money has been spent to date for the COVID19 vaccine outreach program by “Next Wave Strategies” and Ft. Bend County in total.**

The citizens of Ft. Bend County have a right to understand how their taxpayer funds are being spent for the COVID19 vaccine outreach program. Texas residents have a myriad of options if they choose to get vaccinated, via the private sector. I strongly encourage the Texas AG's office and Governor Abbott to take action in order to cease all such efforts to go door to door with a COVID19 vaccine outreach program. This COVID19 vaccine outreach program is not in the public interest, since this is a total waste of taxpayer funds and it's a veiled hyper-partisan effort. In our opinion, this is simply an effort to bypass the prohibition of government actors/entities engaging in this type of activity.

The majority of Texans strongly object to these tactics to launch a pressure campaign to be vaccinated. What's next, a secret list of those who are unvaccinated? At a recent Ft. Bend County Commissioners Court meeting, approximately a hundred Ft. Bend County citizens turned out to voice their objections to this outreach program. Yet, it was still approved, despite huge opposition. Recently, Next Wave Strategies took down their website, which is now “under construction”. Yet, the entity's Facebook posts reveal that it is a hyper partisan organization, which has many ties to Texas Democrats and the D.N.C. (Democrat Party). Therefore, these efforts to push for the vaccine in the community has the potential to lead to confrontations which could endanger the public and/or members of Next Wave Strategies themselves. This entire effort is unwarranted, wasteful, and may lead to threats to public safety. Many Texans have now put out “no solicitation” and “no trespassing” signs in an effort to stop these government overreach efforts. Please act now to (1) scrutinize this particular program from a legal perspective and also (2) further investigate the funding of this program. Furthermore, I encourage the AG's office and/or Governor Abbott to take legal action to cease all such COVID19 vaccine outreach programs. Thank you for your attention to this matter.

Sincerely,

Madhu Sekharan

Madhu Sekharan, J.D., M.B.A.

Attorney at Law



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