



THE BECKHAM GROUP

TRIAL LAW

April 21, 2016

Raymond Atkins
Sidley Austin LLP
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Washington, D.C. 20005

via email ratkins@sidley.com

Re: Request for October 13, 2015 Insight Research Report titled *Texas Central's High Speed Rail Corridor and Related Private Development Houston to Dallas/Fort Worth, Texas.*

Dear Raymond,

I represent Texans Against High Speed Rail, an organization which opposes Texas Central's proposed high-speed rail project ("HSR"). On April 19, 2016, you submitted a Petition for Exemption on behalf of Texas Central to the Surface Transportation Board. In the Petition, you reference a report created by Insight Research Corporation titled *Texas Central's High Speed Rail Corridor and Related Private Development Houston to Dallas/Fort Worth, Texas* (the "Report"). I assume Texas Central commissioned and paid Insight Research Corporation to create this Report. If I am wrong about that, then please tell me who did.

On Page 11 of your Petition (footnote 33), you claim the Report supports Texas Central's contentions that the HSR "could spur \$36 billion in economic benefits, and generate nearly \$2.5 billion in tax revenues to the state counties, local municipalities, school districts and other taxing entities, between 2015 and 2040." Texas Central has echoed these bold claims to the public, both on its website and through the press, in a summary PowerPoint presentation titled "Texas Central Partners Economic Impact Report Summary" dated October 2015. In fact, Texas Central makes numerous additional claims in the PowerPoint regarding the alleged economic benefits of the HSR, relying solely on the Report as support for its claims. However, Texas Central has refused to release the actual Report itself, which presumably contains the objective data used to calculate the supposed economic benefits.

Your Petition filed with the Surface Transportation Board is public information. Because you rely on the Report as support for your claims in the Petition, it should also be made available to the public. Moreover, I assume Texas Central would want to share the Report with the public, if indeed it describes all the economic benefits the HSR will generate in Texas.

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I am requesting an unredacted copy of the Report along with the identity of who commissioned and paid for it. Texas citizens and potentially affected private property owners have a right to view this public information, especially given that Texas Central and its Japanese partners are using it in their efforts to take private property from Texans through the use of eminent domain. Furthermore, Texas Central has no legitimate basis for refusing to disclose it. Several media outlets, including the Houston Press, have made similar requests for the actual Report but they too were provided only the summary PowerPoint. Why is your client hiding the Report from the public, and on what basis is it doing so?

I intend to forward this request to the thousands of members of my client's opposition group so they will know that I am making this request on their behalf, and why I am doing so.

Please respond in writing as soon as possible.

Sincerely,

/s/ Patrick McShan

Attorney for Texans Against High Speed Rail