



June 16, 2026

Via Email: bert.vandenberg@dallas.gov

Mayor Eric Johnson and Members of the Dallas City Council
c/o Bertram Vandenberg, City Attorney
City Attorney's Office
1500 Marilla Street, Suite 7CN
Dallas, Texas 75201

Re: Preservation Demand and Litigation Hold — Anticipated Claims Concerning Dallas City Hall, City Hall Plaza, City Hall Relocation/Disposition Alternatives, Public-Comment/Speaker-Registration Issues, and Related City Proceedings

Counsel:

The Save Dallas City Hall Coalition has recently become aware of the removal of videos and related documents from the City of Dallas (“City”) website for the meeting of the City Council’s Finance Committee on October 21, 2025, the joint meeting of the Council’s Economic Development Committee and Finance Committee on November 3, 2025, the meeting of the Council’s Finance Committee on November 4, 2025, and the meeting of the City Council on November 12, 2025. Please regard this correspondence as a formal demand that the City, the Dallas City Council, and all departments, officials, employees, agents, contractors, and information-technology personnel acting on their behalf (specifically including the Dallas Economic Development Corporation) immediately preserve all documents, electronically stored information, recordings, and tangible materials relevant to the potential claims and defenses at issue in the above-referenced matter.

This matter concerns, without limitation, the City’s decisions, communications, proceedings, and records regarding: Dallas City Hall; City Hall Plaza; the repair, maintenance, renovation, demolition, abandonment, relocation, disposition, sale, lease, redevelopment, or reuse of Dallas City Hall or City Hall Plaza; alternatives to the current City Hall building; Financial Management Performance Criteria No. 20; City Hall repair-cost estimates and funding sources; any proposed arena, sports-franchise, entertainment-district, real-estate, public-private, eminent-domain, land-assemblage, incentive, lease, transfer, or redevelopment transaction involving or affecting Dallas City Hall, City Hall Plaza, or nearby public land; conflicts of interest or recusals relating to those matters; and public-comment, speaker-registration, agenda, notice, livestream, and meeting-access issues concerning public proceedings at which those matters were or will be considered.

Because litigation is plainly anticipated, the City must suspend any routine or automatic deletion, overwriting, recycling, purging, or destruction of potentially relevant materials. That obligation includes preservation of metadata and preservation in native format where applicable. It also includes materials stored on local devices, network drives, cloud systems, mobile devices, text-messaging platforms, collaboration systems, archived systems, backups retained in the ordinary course, and any third-party platforms used to administer or record City business.

The preservation demand includes, at a minimum, the following categories of materials:

- All written documents, paper files, correspondence, memoranda, notes, calendars, agendas, agenda back-up materials, minutes, drafts, annotations, routing slips, and transmittals relating to City Council meetings, briefings, public-comment procedures, speaker registration, Dallas City Hall, City Hall Plaza, demolition, disposition, or repair discussions, alternatives to the current City Hall building, and related public business.
- All digitized documents and electronically stored information, including emails, attachments, text messages, instant messages, chat messages, shared-drive files, cloud-stored files, spreadsheets, presentations, databases, exported reports, logs, audit trails, and electronically stored drafts, together with associated metadata.
- All records concerning speaker-registration and public-comment administration, including sign-up records, timestamps, confirmation messages, denial notices, queue data, screen captures, call logs, internal guidance, exception handling, and communications with any speaker seeking to address the Council on relevant agenda items.
- All audio and video recordings of public proceedings, including City Council meetings, briefings, special called meetings, committee meetings, livestreams, archived streams, internally stored recordings, broadcast recordings, clips, excerpts, surveillance footage capturing relevant events, and any derivative copies or exports of those recordings.
- All records reflecting the creation, editing, retention, publication, removal, alteration, or deletion of any public-meeting video, audio, agenda, registration, or web-posted material, including content-management logs, website publication records, streaming-platform records, and retention or deletion logs.
- All communications among or involving the Mayor, Councilmembers, the City Attorney's Office, the City Secretary's Office, the City Manager's Office, facilities personnel, communications staff, information-technology personnel, outside consultants, and any third-party vendors concerning the matters at issue.
- All records relating to the Dallas City Hall building condition assessments, repair plans, demolition planning, cost analyses, code analyses, public messaging, consultant work, and communications with private stakeholders to the extent those materials overlap with the dispute or the public proceedings in question.
- All complaint files, legal analyses, notices, claim correspondence, exhibits, attachments, and internal evaluations relating to the claims already presented to the City by or on behalf of Save Dallas City Hall Coalition.

Relevant custodians include, without limitation, the Mayor, Councilmembers, council staff, the City Manager's Office, assistant city managers, the City Attorney's Office, the City Secretary's Office, the Chief Financial Officer and Budget Office, the City's Economic Development Corporation ("EDC"), Building Services, Facilities and Real Estate, Planning and Urban Design, Historic Preservation staff, the Landmark Commission and staff, Park and Recreation, Convention and Event Services, Economic Development, Procurement, Communications/Media Relations, Information and Technology Services, the Records Management Officer, the Public Information Office, the Inspector General, outside counsel, consultants, architects, engineers, cost estimators, brokers, developers, arena or sports-franchise representatives, and any third-party vendors involved in meeting administration, speaker registration, streaming, recording, archiving, website publication, cost estimating, facility assessment, land use, financing, or redevelopment. This hold applies to the City's EDC because Section 6.07 of the EDC's Bylaws provides "the City shall have access to the ... documents, records, and other materials of the [EDC] at any reasonable time...."

The relevant time period should be construed broadly. At minimum, the City should preserve materials from January 1, 2025, through the present, as well as any earlier materials necessary to understand the development, implementation, or justification of the challenged policies, decisions, statements, or public proceedings.

To implement this hold, the City should immediately:

- Issue a written litigation hold to all relevant custodians and departments;
- Identify and preserve all relevant data repositories, devices, accounts, applications, and storage locations;
- Disable auto-delete, overwrite, purge, and recycling functions that could affect relevant materials;
- Preserve all relevant recordings in their original and any publicly disseminated formats;
- Preserve metadata, audit trails, and chain-of-custody information for electronically stored information and recordings;
- Maintain a record of the preservation measures undertaken and the custodians notified.

The hold applies regardless of whether the material is stored on City-owned systems or on personal devices, personal email accounts, messaging applications, social-media accounts, or third-party platforms, to the extent the material was created, transmitted, received, maintained, or used in connection with official City business.

Please ensure that no relevant material is altered, truncated, reformatted, or selectively produced in a manner that strips metadata or compromises evidentiary integrity. Preservation must include native files and source recordings, not merely screenshots, printouts, summaries, or compressed derivatives.


This demand is consistent with the City's obligations under Texas law, including the preservation requirements applicable to local-government records when litigation is pending or reasonably anticipated, the statutory requirements governing records of open meetings, and the prohibitions against destruction or alteration of public information. *See, e.g.*, Tex. Gov't Code chs. 441, 551 & 552; Tex. Loc. Gov't Code ch. 203; Tex. Penal Code § 37.10; Dallas City Charter ch. IIIA, § 3 & ch. XVIII, § 6; Dallas City Code ch. 39C. Nothing in this letter narrows any broader preservation obligations that may arise under applicable law.

Please provide written confirmation within seven (7) days that the City has implemented an effective litigation hold, suspended routine destruction practices as to relevant materials, and taken reasonable steps to preserve the categories of information identified above. If the City contends that any potentially relevant materials have already been lost, deleted, overwritten, or destroyed, please identify those materials, the date and manner of loss, the persons involved, and the steps taken to recover them.

If you believe there is any genuine uncertainty about the scope of materials to be preserved, that uncertainty should be raised promptly and should not delay implementation of a comprehensive hold. We reserve all rights relating to the preservation, collection, inspection, and production of evidence, including all rights to seek appropriate relief in the event of spoliation.

Sincerely,


Christopher D. Bowers


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Robert Miklos


R. Michael Northrup


Vonciel Jones Hill


Scott Griggs

Counsel for Save Dallas City Hall Coalition