Outlook

Subject: PUBLIC INFORMATION REQUEST (TPIA) – GMA-15 Financial Ledgers, Vendor Contracts, and Joint Planning Expenditures

From Jerry Moerbe <hsoilco@gmail.com>
Date Sun 10/4/2026 1:11 AM
To Tim Andruss <tim.andruss@vcgcd.org>; Admin at VCGCD <admin@vcgcd.org>
Cc David <david@fayettecountygroundwater.com>; Wendi Labus <wendi@fayettecountygroundwater.com>; Monique Norman <norman.law@earthlink.net>; Lois Kolkhorst <Lois.Kolkhorst@senate.texas.gov>; dennis@goosesroost.com <dennis@goosesroost.com>; sao@sao.texas.gov <sao@sao.texas.gov>

From: Jerry Moerbe
Date: October 4, 2026

Subject: PUBLIC INFORMATION REQUEST (TPIA) – GMA-15 Financial Ledgers, Vendor Contracts, and Joint Planning Expenditures

To Tim Andruss, Administrator for Groundwater Management Area 15:

Pursuant to the Texas Public Information Act (Texas Government Code, Chapter 552), I formally request public records pertaining to the administrative, legal, and hydrogeological expenditures of Groundwater Management Area 15 (GMA-15), specifically concerning the pooling of public tax dollars from its member Groundwater Conservation Districts.

Because GMA-15 operates using the tax revenue of its member districts, its financial ledgers and vendor contracts are express public information under Texas Government Code § 552.022(a)(3).

Please provide complete, unredacted electronic copies of the following records from **January 1, 2021, to the present date**:

1. Intergovernmental Financial Transfers & Cost-Sharing: All financial ledgers, joint-planning agreements, cost-sharing authorizations, and transfer vouchers detailing the exact monetary contributions made by the **Fayette County Groundwater Conservation District (FCGCD)** and the **Evergreen Underground Water Conservation District (EUWCD) and the other member Districts** to GMA-15 for regional administration, legal fees, and hydrogeological modeling.

2. Hydrologist Contracts & Payment Vouchers (DBS&A / Geo-Logic): All professional services agreements, task orders, engagement contracts, and itemized vendor invoices between GMA-15 and **Daniel B. Stephens & Associates (DBS&A), Geo-Logic Associates**, or hydrogeologist **Paul Kirby**. This specifically includes all financial billing and testing methodology proposals related to regional groundwater modeling and GAM Run 21-020.

3. Legal Counsel Contracts & Payouts (Monique Norman): All engagement letters, retainer agreements, itemized legal invoices, and canceled checks/payment vouchers issued by GMA-15 to attorney **Monique Norman**. I request the paper trail of all public funds disbursed to Ms. Norman for advising the GMA-15 joint planning committee. Also any contract or employment agreement(s).

4. Official Meeting Minutes & Administrative Records: All approved meeting minutes, audio recordings, and attendance logs for GMA-15 joint planning meetings where financial expenditures, model funding, or contracts regarding DBS&A or Monique Norman that were voted upon by member district representatives (including David Van Dresar, Wendi Pyle Labus, or Russell Labus).

I request all financial records, vendor contracts, master ledgers, and documentation detailing how payments were made, to whom, and the supporting approved invoices.

As a reminder, under Texas Government Code § 552.221, these records must be produced promptly. If you intend to seek an Open Records Decision from the Attorney General to withhold any financial contracts or invoices, you must do so within 10 business days.

I look forward to your prompt compliance.

Sincerely,

Jerry Moerbe