

NATIVE CHAOS HOLDINGS

Independent Transparency Initiative

Pre-Release Courtesy Distribution | Independent Compliance Research

July 10, 2026

VIA CERTIFIED MAIL — RETURN RECEIPT REQUESTED

Office of the Attorney General of Texas
Administrative Law Division — Local Government Section
300 W. 15th Street
Austin, Texas 78701

Re: Pre-Release Courtesy Copy — Independent Compliance Research on City of Chandler, Texas Code of Ordinances (Dillon's Rule Audit, June 2026)

Dear Public Information Coordinator:

Native Chaos Holdings, an independent transparency initiative publishing independent compliance research, is pleased to provide a courtesy pre-release copy of a Non-Compliance Findings Report concerning the City of Chandler, Texas Code of Ordinances. This research reviews publicly available provisions of the City Code against the legal framework applicable to Type A general-law municipalities under Dillon's Rule and the Texas Constitution. The research identified 145 actionable findings across 16 audited units (14 chapters, with Chapter 14 split into two parts, plus the New Laws Queue), of which 16 are CRITICAL, 35 are HIGH, 45 are MEDIUM, and 49 are LOW. This packet contains fact-checked and corrected content as of June 20, 2026.

Native Chaos Holdings is an independent research initiative. This packet is provided for informational purposes only and does not represent, coordinate with, or request action by the City of Chandler, Texas, its City Council, or any other City official. Native Chaos Holdings has no authority to direct, implement, or require any corrective action.

The findings within the Office of the Attorney General's oversight and advisory jurisdiction, as identified by the research, are as follows:

- CRITICAL — §1.03.046: Authority gap; mayoral statement-of-objections mechanism not granted under LGC Ch. 22 for Type A general-law municipalities
- CRITICAL — §3.03.031, §3.03.091, §3.03.291, §3.03.411, §3.03.471, §3.03.521: Outdated building/residential/electrical/plumbing/mechanical/fuel gas code editions (2009 IBC/IRC/IPC/IMC/IFGC; 1997 NEC) — life-safety, energy-code, and insurance coverage gaps
- CRITICAL — Article 3.03 — IECC Omission: No division adopts the International Energy Conservation Code despite HSC §388.003 statewide mandate
- CRITICAL — §4.03.035: Constitutional infirmity; junk dealer race/sex/nationality data collection provisions
- CRITICAL — §4.07.012, §4.07.011–.018: Preemption conflict; oil and gas well construction standards (casing, cementing, blowout preventers, pits) within RRC exclusive jurisdiction under NRC §81.0523
- CRITICAL — §4.07.028: Ultra vires tax; municipal oil production tax without statutory authority
- CRITICAL — §5.04.005: Conflict with LGC §342.003(c) (fireworks seizure carve-out)
- CRITICAL — §7.02.001 / §7.02.004: Internal conflict; municipal court judge appointment vs. ex officio mayor under Gov't Code §29.004
- CRITICAL — §8.05.006: Sex-offender residency penalty cap (Class C \$2,000 vs. \$500 statutory cap)

- CRITICAL — §11.04.007: Conflict with Tax Code §351.101 (HOT use of proceeds — 10% to general fund)
- CRITICAL — §12.04.052: Conflict with LGC §54.001 and Penal Code §12.23 (Class C penalty cap)
- CRITICAL — §13.04.009: Drought Contingency Plan overdue approximately 7.5 years in violation of 30 TAC §288.20(c) mandatory five-year review cycle
- CRITICAL — Ch. 14 Part 2 (Exhibit 14A Fee Schedule): Fee or fine provision exceeds statutory cap without independent enabling authority
- CRITICAL — Ex.10A §6.1: Takings/Exaction (parkland dedication without nexus/proportionality)
- HIGH — §1.02.051–.055: Texas Tort Claims Act notice conflict (CPRC §101.101)
- HIGH — §1.10.061: Authority gap; park firearms ban preemption (LGC §229.001) — Fact-check correction (June 20, 2026): defect is broader than outdated CHL terminology; HB 1927 (2021) permitless carry broadened the protected class
- HIGH — §2.05.001: Vicious animal appeal window 5 business days vs. HS §822.042(b) statutory floor
- HIGH — §3.03.263: Electrician qualification conflict with statewide TDLR regime (Occ. Code Ch. 1305)
- HIGH — §3.01.002: Minimum 1,200 sq ft dwelling size lacks clear LGC Ch. 211 anchor
- HIGH — §3.10.013(E),(G): Satellite dish restrictions preempted by FCC OTARD rule (47 C.F.R. §1.4000)
- HIGH — §4.05.002: Pawnshop hours conflict with Finance Code §371.151
- HIGH — §4.07.006: \$100,000 bond requirement risks violating NRC §81.0523(c) 'commercially reasonable' standard
- HIGH — §4.08: Pipeline preemption under NRC §81.0523 and HB 2127
- HIGH — §4.09.006: Class C penalty cap (mobile food vendors)
- HIGH — §6.02.005 / §6.03.007: Wrong chapter citation (HSC Ch. 343 vs. Ch. 342)
- HIGH — §7.05.003: Court technology fee (CCP Art. 102.0172 inapplicable to cities <100k)
- HIGH — §8.05.002 / §8.05.003: Sex-offender residency — no LGC grant for Type A cities
- HIGH — §8.04.003 / §8.04.036 / §8.04.034 / §8.04.035: Criminalization of civil Ch. 683 remedy
- HIGH — §9.02.011: Preemption of state Penal Code §§38.03/37.11
- HIGH — Ex.10A §3.3: ETJ scope — should be capped at ½-mile per LGC §42.021
- HIGH — Ex.10A §§4.2–4.4: Plat approval timeline conflict with LGC §212.009
- HIGH — §11.04.006: HOT penalty cap (Tax Code §351.004)
- HIGH — §12.01.016: Accident reporting threshold conflict (Transp. Code §550.062)
- HIGH — Ch. 14 Part 1: Manufactured Home Park operator licensing — possible Occupations Code Ch. 1201 preemption
- HIGH — Ch. 14 Part 1: Family definition / group home FHA conflict

Findings Routed to TX-AG

Ordinance	Category	Severity	Description
§1.03.046	AUTHORITY GAP	HIGH	Mayoral statement-of-objections mechanism
§3.03.031 et al.	OUTDATED CODES	CRITICAL	2009 IBC/IRC/IPC/IMC/IFGC; 1997 NEC
Art. 3.03 (IECC)	CONFLICT/OMISSION	CRITICAL	No IECC adoption despite HSC §388.003
§4.03.035	CONSTITUTIONAL	CRITICAL	Race/sex/nationality data collection
§4.07.011–.018	PREEMPTION	CRITICAL	Subsurface well construction (RRC)
§4.07.028	ULTRA VIRES TAX	CRITICAL	Municipal oil production tax
§5.04.005	CONFLICT	CRITICAL	Fireworks seizure vs. LGC §342.003(c)
§7.02.001+.004	CONFLICT	CRITICAL	Conflicting judge provisions
§8.05.006	PENALTY CAP	CRITICAL	Sex-offender fine exceeds \$500 cap
§11.04.007	CONFLICT (HOT)	CRITICAL	10% to general fund violates Tax §351.101
§12.04.052	CONFLICT (PENALTY)	CRITICAL	\$2,000 Class C fine exceeds cap
§13.04.009	CONFLICT (TCEQ RULE)	CRITICAL	Drought Contingency Plan 7.5yr overdue

Ex.10A §6.1	TAKINGS/EXACTION	CRITICAL	Parkland exaction (Nollan/Dolan)
Ch.14 Pt.2 Fee	PENALTY/FEE CAP	CRITICAL	Fee schedule exceeds statutory cap
§1.10.061	PREEMPTION	HIGH	Park firearms ban vs. LGC §229.001 (HB 1927)
§2.05.001	CONFLICT	HIGH	Vicious animal appeal window vs. HS §822.042
§3.03.263	CONFLICT	HIGH	TDLR electrician preemption
§3.10.013	FED. PREEMPTION	HIGH	FCC OTARD satellite dish
§4.05.002	CONFLICT	HIGH	Pawnshop hours vs. Finance §371.151
§4.08	PREEMPTION	HIGH	Pipeline permitting (RRC/HB 2127)
§7.05.003	AUTHORITY GAP	HIGH	Court tech fee — CCP 102.0172 inapplicable
§8.05.002/.003	AUTHORITY GAP	HIGH	Sex-offender residency — no LGC grant

Native Chaos Holdings intends to make the full audit report publicly available no earlier than 30 days from the date of this letter. Native Chaos Holdings respectfully requests the opportunity for any agency technical review of the findings within the Office of the Attorney General's jurisdiction during this period. Should the Office of the Attorney General elect to provide guidance on any of the foregoing findings, Native Chaos Holdings would welcome the opportunity to incorporate that guidance into a supplemental findings annotation before public release. Any inquiries may be directed to Native Chaos Holdings using the contact information set forth above.

Respectfully submitted,

Native Chaos Holdings

Independent Transparency Initiative

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Enclosure: Independent Non-Compliance Findings Report (Full Text)

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APPENDIX — AGENCY PROFILE & DISTRIBUTION TRACKING

Agency Contact Information

Field	Value
Agency	Office of the Attorney General of Texas
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Distribution Tracking

Field	Value
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Native Chaos Holdings	Independent research initiative; not affiliated with or representing the City of Chandler, its City Council, or any City official

Reviewer Notes (for Agency Use)

Native Chaos Holdings welcomes written comments and guidance from your office within 30 days of this distribution. Comments may be returned via email to Chandler@NativeChaosHolding.com with subject line including the Distribution Tracking Code above. All feedback will be incorporated into a supplemental findings annotation before public release of the full audit. This packet is provided for informational purposes only and does not represent, coordinate with, or request action by the City of Chandler, Texas, its City Council, or any other City official.

STATUTE CITATION UPDATE (July 10, 2026)

All statutory citations in this letter have been verified against the current text on statutes.capitol.texas.gov. Key precise citations include:

- LGC §54.001(b): General ordinance fine cap is \$500 (Class C misdemeanor per Penal Code §12.23); \$2,000 only for fire safety, zoning, or public health and sanitation (other than dumping of refuse).
- HS §822.042(b): Owner has 15 days to appeal a dangerous-dog determination ("Notwithstanding any other law, including a municipal ordinance"). Destruction order is stayed for 10 calendar days during appeal.
- LGC §229.001(b): Municipality may not regulate possession of a firearm or air gun in a park or public meeting place owned or leased by a political subdivision (including the city itself).
- HS §388.003: Statewide energy code (current IECC edition) is mandatory.
- Tax Code §351.101: Hotel occupancy tax revenue is strictly limited to tourism, convention, and advertising purposes — no unrestricted diversion to the general fund is permitted.
- NRC §81.0523(b)–(c): Railroad Commission has exclusive jurisdiction over oil and gas operations; subsurface well construction, casing, cementing, and pipeline permitting are preempted unless strictly limited to aboveground activity.

These updates strengthen the findings. The full updated report is enclosed.