

NATIVE CHAOS HOLDINGS

Independent Transparency Initiative

Pre-Release Courtesy Distribution | Independent Compliance Research

July 10, 2026

VIA CERTIFIED MAIL — RETURN RECEIPT REQUESTED

Texas Department of State Health Services
Zoonosis Control Branch — Infectious Disease Prevention
1100 W. 49th Street
Austin, Texas 78756

Re: Pre-Release Courtesy Copy — Dangerous-Dog, Rabies Control, and Animal Ordinance Compliance Findings, City of Chandler, Texas

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, with particular focus on contractor and trade-licensing provisions in Chapter 3 (Building Regulations) and related water well provisions in Chapter 6 (Health and Sanitation). The research reviews publicly available provisions of the City Code against applicable state law and TDLR jurisdiction.

The findings within TDLR's licensing jurisdiction are as follows:

- **HIGH** — §3.03.263: Master electrician qualification by local examination in a city over 5,000 population references a licensing mechanism that has been displaced by the statewide TDLR Master Electrician licensing regime under Occupations Code Chapter 1305.
- **MEDIUM** — §3.03.033: \$1,000 contractor bond figure has not been inflation-adjusted. The bond should be reviewed to confirm it remains adequate as a code-enforcement mechanism and is not functioning as an independent occupational licensing requirement in a TDLR-preempted field.
- **MEDIUM** — §6.04.003: Water well setback requirements intersect with TDLR Water Well Drillers Program oversight and 30 TAC §290.41(c)(1)(F) sanitary-control requirements; the ETJ application may exceed municipal authority.

Findings Routed to TX-TDLR

Ordinance	Category	Severity	Description
\$2.05.001	CONFLICT	HIGH	Dangerous-dog appeal window 5 business days vs. HS §822.042(b) 15-day statutory floor
\$2.05.002	CONFLICT	HIGH	Destruction timeline — HS §822.042(b) stay period not reflected
\$2.05.004	AUTHORITY GAP	MEDIUM	Rabies control / LRA duties — DSHS oversight of local rabies control authority
\$2.05.006	AUTHORITY GAP	MEDIUM	Vicious animal definition diverges from HS Ch. 822 framework

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 these licensing provisions during this period. Should TDLR 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)

Distribution Tracking Code: NCH-TX-DSHS-20260710

APPENDIX — AGENCY PROFILE & DISTRIBUTION TRACKING

Agency Contact Information

Field	Value
Agency	Texas Department of State Health Services
Division	Zoonosis Control Branch — Infectious Disease Prevention
Main Address	1100 W. 49th Street
Main Phone	(512) 776-7676
Public Information	(888) 963-7111
Customer Service	The.Vet@dshs.texas.gov
Website	https://www.dshs.texas.gov/zoonosis/
Mailing	1100 W. 49th Street, Austin, TX 78756

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
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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 or 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.