

NATIVE CHAOS HOLDINGS

Independent Transparency Initiative

Pre-Release Courtesy Distribution | Independent Compliance Research

July 10, 2026

VIA CERTIFIED MAIL — RETURN RECEIPT REQUESTED

Texas State Fire Marshal's Office
Texas Department of Insurance
333 Guadalupe Street
Austin, Texas 78701

Re: Pre-Release Courtesy Copy — Fireworks, Fire Code, and Fire Safety 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 fireworks, fire code, and fire safety compliance under Chapter 5 (Fire Prevention). The research reviews publicly available provisions of the City Code against the State Fire Marshal's jurisdiction over fireworks regulation, fire code adoption, and fire safety enforcement.

The findings within EPA's water program jurisdiction are as follows:

- HIGH — §13.03.137: Damaging/tampering with sewer system provision requires review for consistency with federal SDWA standards and statutory authority.
- HIGH — §13.06.009: Use of sanitary sewer system provision requires review for consistency with federal SDWA standards and statutory authority.
- MEDIUM — §13.04.009: Drought Contingency Plan update overdue. See TCEQ routing (Texas is the primary implementing agency for SDWA in this jurisdiction).
- MEDIUM — §6.04.003: Well-protection buffer zones extend into the ETJ. The general-law police-power authority does not extend into the ETJ absent specific statutory grant. The provisions have Safe Drinking Water Act implications for sanitary control.
- MEDIUM — Chapter 13 (Utilities) cross-references: Cross-connection control and water/wastewater systems should be reviewed for continued SDWA compliance.
- LOW — §6.04.004: Unqualified 'right of entry' for inspections lacks 'reasonable time,' notice, and credentials requirements.
- LOW — §13.03.077, §13.03.128: Cross-connection control and stormwater provisions should be cross-checked against current SDWA and EPA rules.

Findings Routed to EPA-6

Ordinance	Category	Severity	Description
§5.04.005	CONFLICT	CRITICAL	Fireworks seizure without packaged/unopened carve-out — LGC §342.003(c)
§5.03.001	OUTDATED	CRITICAL	2009 International Fire Code — multiple cycles behind

\$5.03.002	OUTDATED	CRITICAL	2009 IFC amendments frozen — no current fire-code enforcement
\$5.01.004	AUTHORITY GAP	HIGH	Outdoor burning regulation overbreadth relative to TCEQ/Fire Marshal scope

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 confirmation that the water system and cross-connection provisions are consistent with applicable federal law. 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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Email: Chandler@NativeChaosHolding.com

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

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APPENDIX — AGENCY PROFILE & DISTRIBUTION TRACKING

Agency Contact Information

Field	Value
Agency	Texas State Fire Marshal's Office
Region	Fireworks and Fire Code Compliance (Texas Department of Insurance)
Address	333 Guadalupe Street
Main Phone	(512) 676-6800
Public Information	(800) 578-4677
SDWA	SFM.Fireworks@tdi.texas.gov
Web	https://www.tdi.texas.gov/fire/
Email	Fire.Marshal@tdi.texas.gov

Distribution Tracking

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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.