



STATE OF TEXAS
OFFICE OF THE ATTORNEY GENERAL
FINANCIAL LITIGATION AND CHARITABLE TRUSTS DIVISION

REQUEST TO EXAMINE

To: Douglas Henck, Board Chair
The Tahirih Justice Center
6400 Arlington Blvd., Ste. 400
Falls Church, Virginia 22042

Via CMRRR #7004 1160 0000 7310 6848

Re: The Attorney General's Investigation of the Tahirih Justice Center

The Office of the Attorney General, as the representative of the public's interest in charity, is charged under Texas law with the power and duty to protect and enforce the public interest in charitable nonprofit organizations and charitable trusts. In this capacity, this office reviews charitable nonprofit entities to determine compliance with Texas law and the common law fiduciary duties of trustees of charitable trusts and officers, directors, and employees of charitable nonprofit organizations.

The Tahirih Justice Center ("TJC") is a foreign charitable nonprofit corporation doing business in Texas and recognized as tax exempt under Section 501(c)(3) of the Internal Revenue Code. Pursuant to this office's authority under Texas law, including Section 252.010 et seq. of the Texas Business Organizations Code, the Attorney General is issuing this Request to Examine ("RTE"), requesting that TJC produce the documents set forth in Attachment "A." This material shall be produced and made available at TJC's primary place of business on **December 21, 2022**. In the alternative, the requested material may be sent, preferably in electronic format, to the following address on or before **December 22, 2022**: Office of the Attorney General, Charitable Trusts Section, Consumer Protection Division, P.O. Box 12548, Austin, Texas 78711.

Duty to Supplement

TJC and its board and officers are given notice that this Request to Examine remains effective until the Attorney General's investigation is completed and that TJC has a continuing duty to supplement its responses and to continue the production of documents and records that are within the scope of these requests. Additionally, as the investigation progresses, the Attorney General may request additional documents pursuant to one or more Supplemental Requests to Examine.

ISSUED THIS 22nd day of November 2022.

/s/ Mary T. Henderson

Mary T. Henderson

Assistant Attorney General

State Bar No. 19713750

Managing Attorney for Charitable Trusts

Consumer Protection Division

P.O. Box 12548

Austin, Texas 78711-2548

(512) 936-1333 - Direct Line

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ATTACHMENT A**A. Definitions**

For purposes of this Request to Examine (“RTE”), the terms used herein shall have the following meanings:

1. "TJC" shall mean the Tahirih Justice Center, as well as all persons acting or purporting to act on behalf of such entity, including any attorney, trustee, director, officer, agent, employee, consultant, volunteer or other representative.
2. "And" and "or" shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of this RTE any document that might be deemed outside its scope by another construction.
3. “Bank account” shall mean any savings, checking, investment or trust account held in the name of TJC, or of any person, as defined herein, for the benefit of TJC.
4. “Compensation” shall mean and include all benefits of any value, monetary or otherwise, including but not limited to, salary, insurance, pay for unused sick leave and vacation leave, overtime, deferred compensation, number of days off, including both sick and vacation time, reimbursements, privileges, memberships, and use of TJC’s property and assets.
5. "Document" and "documents" shall be used in their broadest sense. Document shall include all written, printed, typed, recorded, computer-generated, computer-stored, or electronically stored matter or graphic matter of every kind and description, both originals and copies, and all attachments and appendices thereto that are in your possession, custody or control. Without limiting the term "control," a document is deemed to be within your control if you have ownership, possession or custody of the document, or the right to secure the document or copy thereof from any person or public or private entity having control thereof.
6. “Donor restricted gift(s),” “donor restricted fund(s),” or “donor restricted asset(s)” shall mean a gift, grant, contribution, or donation intended by a donor or grantor to be used for a specific purpose or on behalf of a specific entity as well as a gift, grant, or donation intended by a donor or grantor to be held in perpetuity or for any other specified time period, regardless of whether income from that donation is designated for a specific purpose or may be used for general operations. Donor restricted gifts may be restricted as to purpose and/or duration.
7. To “identify” an individual means you shall state that individual’s:
 - (i) name;
 - (ii) current or last known telephone numbers at business and home; and
 - (iii) current or last known business and home addresses.

8. To “identify” a person other than an individual means to state:
 - (i) the full name;
 - (ii) the nature of its organization;
 - (iii) the address and telephone number of its principal offices and, if applicable, the state in which it is incorporated; and
 - (iv) its principal line of business or activity.

9. To “identify” any other tangible thing means:
 - (i) to identify what it is, giving a reasonably detailed description thereof;
 - (ii) to state when, where, and how it was made, if applicable;
 - (iii) to identify who made it, if applicable; and
 - (v) identify its current custodian or the person that had last known possession, custody, or control thereof.

10. A “person” shall include any individual, institution, corporation, association, joint venture, firm, proprietorship, agency, board, authority, commission or other entity.

11. "Relate(d) to" and "relating to" shall include, without limitation, all information that directly or indirectly contains, records, reflects, summarizes, evaluates, refers to, indicates, or comments upon or discusses the operations, conduct, and management of TJC or that in any manner states the background of, or was the basis or were the bases for, or that record, evaluate, comment upon, or were referred to, relied upon, utilized, generated, transmitted, or received in arriving at any person’s conclusion(s), opinion(s), estimate(s), position(s), decision(s), belief(s), or assertion(s) concerning the operations, conduct, and management of TJC.

12. “RTE” shall mean this Request to Examine issued pursuant to §§ 252.010 et seq., Texas Business Organizations Code.

13. “You” and “your” shall refer to TJC and shall include all persons acting or purporting to act on behalf of TJC, including any attorney, director, officer, agent, employee, consultant, volunteer or other representative.

B. Instructions

1. Refer to the definitions above in responding to the requests.
2. Respond to each of the following requests individually and in writing, indicating whether TJC has documents responsive to each request.
3. If you do not control the documents requested, expressly respond to each request indicating that you do not control the document(s) and identify the person(s) who has control of the document(s).
4. When providing documents, please note to which request the documents respond. For each request, provide all documents unless indicated otherwise.

5. *All requests are for the period January 1, 2012 to the present, unless otherwise specified.*

C. Requests: Documents to be Produced

1. Correspondence to and from the Texas Bar Foundation.
2. Documents related to the receipt, use, and expenditure of grant funds received from the Texas Bar Foundation, including but not limited to, budgets, general ledger entries, bank statements, and checks.



KEN PAXTON

ATTORNEY GENERAL OF TEXAS

POST OFFICE BOX 12548
AUSTIN TEXAS 78711-2548

Return Service Requested

DOUGLAS HENCK, BOARD CHAIR
THE TAHIRIH JUSTICE CENTER
6400 ARLINGTON BLVD, STE. 400
FALLS CHURCH, VIRGINIA 22042

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1. Article Addressed to:

DOUGLAS HENCK, BOARD CHAIR
THE TAHIRIH JUSTICE CENTER
6400 ARLINGTON BLVD, STE. 400
FALLS CHURCH, VIRGINIA 22042



9590 9402 3467 7275 2496 15

2. Article Number (Transfer from service label)

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Douglas Henck, B
The Tahirih Justice
6400 Arlington B
Falls Church, Va

PS Form 3800, June 2002