

August 22, 2026

U.S. Department of Justice

Civil Rights Division

950 Pennsylvania Avenue, NW

4CON, 8th Floor

Washington, DC 20530

RE: Complaint and Request for Federal Review – Potential Voter Intimidation, Harassment, “Doxing” Retaliation, and Interference with Recall Petition Process in McKinney, Texas

Dear Honorable Assistant Attorney Harmeet Dhillon:

On behalf of **Collin County Citizens for Integrity Political Action Committee**, we are writing to request that the United States Department of Justice review a developing and increasingly concerning situation in McKinney, Texas, involving conduct that appears intended to intimidate, harass, discourage, or otherwise interfere with registered voters who are considering signing a lawful recall petition involving elected officials of the City of McKinney.

The recall process is presently in the signature-gathering stage. Registered McKinney voters are being asked to sign petitions so that the recall question may proceed in accordance with applicable law and ultimately be submitted to the voters.

Our concern is not simply that individuals oppose the recall. Opposition, criticism, political advocacy, and vigorous public debate are expected and constitutionally protected. Our concern involves statements and conduct that appear directed toward **identifying, singling out, harassing, intimidating, or discouraging individual citizens from participating in the petition process, including photographing and video taping them as signing locations and posting online.**

There have been public statements by former elected officials, politically active members of the community, and other individuals discussing methods of interfering with or disrupting the signature-gathering effort. We are preserving these statements and related communications for review.

Of particular concern, during a radio interview discussing the recall, individuals associated with creating or supporting the recall petition were publicly identified and discussed. One individual involved in the petition effort was specifically called out during the broadcast after the individuals responsible for initiating the recall effort had been named.

We are also concerned about conduct occurring through social-media groups. Certain individuals involved in this activity serve as **administrators or moderators of Facebook groups with significant local audiences** and have used, or permitted the use of, those platforms in ways that appear designed to identify, target, criticize, or harass voters and would-be petition signers, and signers being photographed and video taped for “public shaming.”

In some instances, individuals who have signed, expressed an intention to sign, or otherwise shown support for the recall petition have reportedly been **identified publicly by name** in Facebook groups or related online discussions.

This conduct is especially troubling when combined with public statements about interfering with the petition process. The cumulative effect appears to be the creation of an environment in which residents may reasonably fear that their identities, political views, employment, businesses, reputations, community relationships, or personal standing may be publicly exposed or targeted if they sign the petition.

Most troubling, **we are hearing directly from McKinney voters who tell us that they are afraid to sign the recall petition.**

Residents have expressed concern about possible retaliation, public identification, online harassment, attacks on their reputation, damage to professional or business relationships, or other consequences merely because they exercise their right to participate in the recall process.

Some residents have specifically indicated that they do not want their names publicized in local Facebook groups or other forums because they fear being singled out, attacked, or subjected to organized harassment.

That chilling effect is precisely why we believe federal review is warranted.

The issue is no longer simply whether residents support or oppose a recall. The question is whether citizens are being intentionally placed in fear of consequences if they participate in a lawful process designed to determine whether a recall election will be placed before the voters.

We respectfully request that the Department of Justice:

1. **Review the statements and conduct described in this complaint** to determine whether they constitute intimidation, threats, coercion, attempted coercion, retaliation, harassment, interference with voting rights, or violations of any other applicable federal law.

2. **Determine whether federal protections applicable to voters or election-related activities extend to conduct intended to prevent registered voters from signing petitions necessary to place a recall election before the electorate.**
3. **Review any coordinated efforts to identify, publicly name, target, harass, intimidate, or retaliate against petition signers, would-be petition signers, circulators, organizers, or other citizens participating in the recall process.**
4. **Review the use of Facebook groups and other social-media platforms where administrators, moderators, or participants may be identifying voters or would-be petition signers by name in a manner that could reasonably intimidate or chill participation in the petition process.**
5. **Determine whether organized or coordinated online activity is being used to discourage citizens from signing the petition through public exposure, ridicule, harassment, threats, reputational attacks, or fear of retaliation.**
6. **Determine whether any individuals acting under color of governmental authority, or using governmental positions, resources, influence, or information, have participated in or facilitated such conduct.**
7. **Advise whether this matter should also be referred to another component of the Department of Justice, the Federal Bureau of Investigation, the United States Attorney's Office for the Eastern District of Texas, or another appropriate federal or state authority.**
8. Take any additional action the Department considers appropriate to protect citizens' ability to participate freely and without fear in the democratic process.

We are prepared to provide supporting evidence, including:

- recordings and links to relevant radio broadcasts or interviews;
- video recordings;
- social-media posts and comments;
- screenshots and archived communications;
- names of Facebook groups involved;
- names of group administrators or moderators;
- examples in which voters or would-be petition signers were identified publicly by name;

- names of individuals making relevant public statements;
- dates and locations of incidents;
- witness statements;
- statements from voters describing why they are afraid to sign the petition;
- documentation of online harassment or targeting;
- information concerning efforts to interfere with petition-signature gathering; and
- documentation of any incidents involving governmental facilities, officials, employees, or resources.

We recognize that political disagreement, criticism, advocacy, and even harsh rhetoric are constitutionally protected. We are not asking the Department to investigate anyone merely because they oppose the recall or because they criticize its organizers.

Rather, we are asking the Department to examine the distinction between protected political opposition and conduct designed to **identify, expose, intimidate, harass, or pressure individual citizens into abandoning participation in a lawful process that determines whether an election will occur.**

The intentional public identification of individual petition signers or would-be signers deserves particular scrutiny when it occurs in an atmosphere in which citizens are already reporting fear of retaliation or harassment.

The ability of citizens to participate in the electoral process without fear of retaliation is fundamental to representative government. When citizens tell us that they support signing a recall petition but are afraid to place their names on it because they fear being publicly identified, attacked online, harassed, or otherwise targeted afterward, that should concern officials at every level of government.

Time is also an important consideration. The recall petition is subject to a deadline, and the signature-gathering process is underway now. Conduct that chills participation today cannot necessarily be remedied after the petition deadline has passed.

For these reasons, **Collin County Citizens for Integrity Political Action Committee respectfully requests expedited review of this matter.**

We are available to provide additional documentation, witness information, recordings, screenshots, archived social-media content, or other evidence the Department may require.

Thank you for your attention to this matter and for your commitment to protecting the ability of American citizens to participate freely in our democratic institutions.

Respectfully,

Collin County Citizens for Integrity Political Action Committee

CollinCounty@CollinCountyIntegrity.com

A handwritten signature in dark ink, appearing to read "Paul Chabot". The signature is stylized with a large, sweeping initial "P" and a long, horizontal stroke extending to the right.

Paul Chabot, Chair

6710 Virginia Parkway STE 215-7

McKinney, TX 75071