



Jonathan K. Hullihan

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January 12, 2026

Dr. Jack Lee
Superintendent of Schools
Seguin Independent School District
1221 E. Kingsbury Street
Seguin, TX 78155

Via Hand Delivery

Re: Demand for Acceptance and Processing of 141 Written Challenges to Library Materials Submitted on January 12, 2026, on Behalf of Lynette Leanox

Dear Dr. Lee:

Remnant Law is a 501(c)(3) public interest law firm dedicated to advancing and protecting constitutional rights and promoting government accountability for the benefit of the general public. We represent Ms. Lynette Leanox, a resident of the Seguin Independent School District ("Seguin ISD"). As such, Ms. Leanox is entitled to submit written challenges to library materials under Texas Education Code § 33.027, as amended by Senate Bill 13 (effective September 1, 2025).

This letter formally demands that Seguin ISD immediately accept and process the **141** written challenges Ms. Leanox is hand-delivering today, concurrently with this letter. These challenges are deemed formally submitted and received as of this date.

Any Seguin ISD policy, procedure, or guidance that fails to recognize or comply with this duly enacted law—passed by both chambers of the Texas Legislature and signed by the Governor—is unlawful.

FACTUAL BACKGROUND

On December 17, 2025, Ms. Leanox submitted 28 written challenges to library materials using the standard form adopted by the Texas Education Agency (TEA) pursuant to Texas Education Code §33.027(e). Seguin ISD accepted those challenges without any objection to the form or to the application of SB 13 standards as the basis for review—conclusively establishing the validity of that exact form and the propriety of citing §33.021 standards as amended.

On January 6, 2026, Ms. Leanox attempted to hand-deliver an additional 141

written challenges concerning separate library materials. These challenges were submitted on the identical TEA-adopted form previously accepted by your district without objection and clearly identified how each challenged material violates the library collection development standards under Texas Education Code §33.021, as amended by Senate Bill 13.

You flatly refused to accept these 141 challenges, falsely claiming the number was "excessive," that the district lacked sufficient staff to process them, that they were not on the "correct" form, and—most egregiously—that challenges could not rely on SB 13 standards because the Texas State Library and Archives Commission (TSLAC) standards had not yet been fully updated. You then compounded this unlawful refusal by dismissively telling Ms. Leanox to "go hire a lawyer and pay for it," while you would consult the district's taxpayer-funded attorneys—attorneys whose services are paid for by the very tax dollars of Seguin ISD residents, including Ms. Leanox herself.

This brazen rejection is not merely inconvenient; it is a deliberate and unlawful obstruction of a clear statutory right. Texas Education Code §33.027 imposes no cap on the number of challenges a resident may submit, provides no discretion to reject submissions based on volume, staffing excuses, or perceived "excessiveness," and contains no authority for superintendents to invent extra-statutory barriers. The TEA-adopted form is mandatory and sufficient—as your prior acceptance of 40 identical forms conclusively proves—and SB 13's amended standards under §33.021 have been in full force and effect since September 1, 2025, irrespective of TSLAC's April 1, 2026, deadline for final rule updates. Districts are required to adhere to those standards immediately, and challenges citing them are valid and must be processed.

Moreover, Seguin ISD has willfully failed to post the TEA-adopted Library Materials Challenge Form on its website as expressly mandated by §33.027(e), thereby depriving residents—including Ms. Leanox—of easy access to the required process and further demonstrating the district's ongoing noncompliance with SB 13.

STATUTORY VIOLATIONS OF LAW

Your refusal to accept and process these compliant challenges is patently unlawful and constitutes **an ultra vires act that exceeds the scope of your authority under Texas law**. The Texas Education Code grants you no discretion to reject properly submitted challenges on the spurious grounds you invented; such rejection is beyond the legal powers vested in your office as Superintendent.

Accepting and initiating processing of written challenges under §33.027 is a **ministerial duty—mandatory, non-discretionary, and required** by statute without regard to personal judgment, resource constraints, or administrative inconvenience.

Texas courts have repeatedly held that public officials must perform ministerial duties as prescribed by law, and willful failure to do so exposes them to judicial enforcement through writ of mandamus and other remedies.

Your actions directly undermine duly enacted state law, violate Texas Education Code §§33.021 and 33.027 as amended by SB 13, and deprive Ms. Leanox—a taxpaying resident—of her statutory entitlement to challenge inappropriate library materials. By restricting student access pending resolution only after acceptance (per §33.027(f)), your refusal effectively shields challenged materials from scrutiny indefinitely, in direct contravention of the statute's intent to protect students from unsuitable content.

DEMAND

On behalf of Ms. Leanox, I demand that Seguin ISD immediately accept and govern themselves accordingly by processing the 141 written challenges being hand-delivered today, in full compliance with §33.027, including immediate prohibition of student access to the challenged materials district-wide pending review.

Failure to comply may necessitate further action, including but not limited to formal grievances, filing of a petition for writ of mandamus, or pursuit of other appropriate legal remedies to enforce compliance with state law.

Please promptly confirm your compliance as Ms. Leanox reserves all rights and remedies available under Texas law and will enforce such rights as necessary.

Very Respectfully,



Jonathan K. Hullihan

cc: Ms. Lynette Leanox
Seguin ISD Board of Trustees
House District 44 Texas State Representative Alan Schoolcraft