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The Latino Legal Voice for Civil Rights in America.

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Via Email and First Class Mail

February 13, 2026

Karena Bennett
Executive Director
Port Isabel Housing Authority
106 Port Rd.
Port Isabel, TX 78578
karena@portisabelha.com

RE: Public Information Request

Dear Ms. Bennett:

I write to request public information pursuant to the Texas Public Information Act, chapter 552 of the Texas Government Code.

MALDEF has become aware of a letter that the Port Isabel Housing Authority (“Housing Authority”) recently sent to residents requesting “proof of citizenship from all residents.” See Exhibit A. The letter states that the Housing Authority “is required to obtain proof of citizenship from all residents” and cites as its authority Executive Order 14218. *Id.* The letter requests that residents submit, by March 3, 2026, “acceptable documentation verifying your citizenship status” and threatens that “[f]ailure to provide the required documentation within this timeframe may result in termination of your lease[.]” *Id.*

In a local media report, the Housing Authority stated that it is “requesting proof of citizenship” because of “a requirement set forth by the federal government under Executive Order 14218” and that this “executive order represents the new HUD regulations from the previous HUD regulations allowing mix-status households.”¹

¹ See <https://www.valleycentral.com/news/local-news/housing-authorities-tasked-with-reverifying-tenants-citizenship-and-eligible-residency-status/>

As you know, HUD requires neither (1) that program recipients submit proof that they are U.S. citizens, nor (2) that all persons in the household establish eligibility for HUD programs.

In light of the Housing Authority's misstatement of HUD requirements to its program participants, and the Housing Authority's unlawful threat to terminate leases, MALDEF requests further information regarding the Housing Authority's new policy requiring that residents submit proof of U.S. citizenship as a condition of receiving HUD benefits.

Please make the following public information available to MALDEF in the form of photocopies or electronic files, as appropriate. We are willing to pay reasonable costs of duplication and postage, but ask that you waive these costs because this request is made in the public interest and for the purpose of educating Port Isabel and Rio Grande Valley residents regarding the policies of the Housing Authority.

Please provide copies of the following:

1. All information reflecting the understanding of the Housing Authority regarding whether all HUD program participants must be U.S. citizens. This request includes but is not limited to internal communications between or among employees, consultants and contractors of the Housing Authority, as well as any internal analysis conducted by the Housing Authority and communication from HUD;
2. All information that supports the Housing Authority's conclusion that it must "obtain proof of citizenship from all residents." This request includes but is not limited to internal communications between or among employees, consultants and contractors of the Housing Authority, as well as any internal analysis conducted by the Housing Authority and communication from HUD;
3. All information reflecting the understanding of the Housing Authority regarding whether all household members must demonstrate eligibility for HUD program benefits and that household members cannot decline to provide eligibility information. This request includes but is not limited to internal communications between or among employees, consultants and contractors of the Housing Authority, as well as any internal analysis conducted by the Housing Authority and communication from HUD;
4. All information reflecting the conclusion of the Housing Authority that it must verify, for all household members, eligibility for HUD program benefits and that certain household members cannot decline to provide eligibility information. This request includes but is not limited to internal communications between or among employees, consultants and contractors of the Housing Authority, as well as any internal analysis conducted by the Housing Authority and communication from HUD;

5. All information reflecting the understanding of the Housing Authority of the policies that currently apply to mixed immigration status households.
6. All guidance and communications between or among the Housing Authority and HUD regarding proof of citizenship for HUD program eligibility.
7. All information showing the existence of HUD regulations that authorize the Housing Authority to require proof of U.S. citizenship of all household members as a requirement to receive HUD program benefits. This request includes but is not limited to a copy of the “regulations” that the Housing Authority referenced in its media statement and/or the regulations that the Housing Authority believes are “new HUD regulations from the previous HUD regulations allowing mix-status households”;
8. All information showing awareness of the Housing Authority that program participants can be non-U.S. citizens who are otherwise eligible to participate in HUD programs;
9. All information showing consideration and/or action by the Commissioners of the Housing Authority to authorize Housing Authority staff to send the letter attached as Exhibit A to residents;
10. All information showing discussion or consideration by the Housing Authority, during the drafting of the letter attached as Exhibit A, of the effect on eligible non-U.S. citizen residents of demanding “proof of citizenship” as a condition of keeping their HUD benefits and/or their leases;
11. All information showing discussion or consideration by the Housing Authority of its potential legal liability for misstating HUD requirements to its program participants, and threatening to terminate leases for unlawful reasons;
12. All information showing discussion or consideration by the Housing Authority of sending a letter to residents that rescinds the letter attached as Exhibit A and clarifies current HUD regulations and legal requirements regarding eligibility of non-U.S. citizens and certain persons within mixed status families;
13. All drafts of the letter sent by the Housing Authority to program recipients demanding proof of U.S. citizenship of household members and attached as Exhibit A;
14. All drafts of the Housing Authority’s media statement regarding the request for “proof of citizenship”;

15. All information showing the use of an artificial intelligence language model, including but not limited to Chat GPT or Claude, to draft or finalize the letter sent by the Housing Authority to program recipients demanding proof of U.S. citizenship of household members;
16. All information showing the use of an artificial intelligence language model, including but not limited to Chat GPT or Claude, to draft or finalize the media statement regarding the request for “proof of citizenship.”

Please respond to this request within 10 days as required by the Texas Public Information Act. If you have any questions, you may reach me at 210-224-5476, ext. 2012. Thank you for your attention to this matter.

Sincerely,



Nina Perales
Vice President of Litigation

cc: Luisa Moore
Administrative Assistant
lmoore@portisabelha.com

Deputy Director/Section 8 Manager
Erika Galvan
erika@portisabelha.com

Housing Programs Manager
Araceli Vasquez
araceli@portisabelha.com

EXHIBIT A

This letter is to formally notify you that, in accordance with Executive Order 14218 issued on January 23, 2026, Port Isabel Housing Authority is required to obtain proof of citizenship from all residents.

You are hereby given **thirty (30) days** from the date of this notice to submit acceptable documentation verifying your citizenship status. Failure to provide the required documentation within this timeframe **may result in termination of your lease** in accordance with applicable housing regulations and lease provisions.

Acceptable forms of documentation may include, but are not limited to:

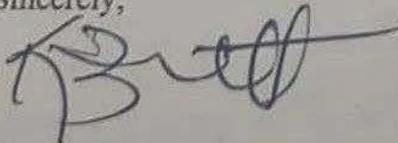
- U.S. Birth Certificate
- U.S. Passport or Passport Card
- Certificate of Naturalization
- Certificate of Citizenship
- Other government-issued documentation verifying citizenship status

Please submit copies of the required documents to **106 Port Rd Port Isabel, Texas 78578** no later than **March 3, 2026**. If you need assistance, have questions regarding acceptable documentation, or require reasonable accommodations, we encourage you to contact our office as soon as possible.

Port Isabel Housing Authority is committed to working with our residents to ensure compliance with all federal requirements while minimizing disruption to housing stability.

Thank you for your prompt attention to this matter.

Sincerely,



Karena Bennett
Executive Director

106 Port Road
P.O. Box 1196
Port Isabel, TX 78578

Phone (956) 943-
Fax (956) 943-

