



ATTORNEY GENERAL OF TEXAS
GREG ABBOTT

March 30, 2006

Mr. Robert A. Schulman
Feldman & Rogers
517 Soledad Street
San Antonio, Texas 78205-1508

OR2006-03209

Dear Mr.Schulman:

You ask whether certain information is subject to required public disclosure under the Public Information Act (the "Act"), chapter 552 of the Government Code. Your request was assigned ID# 245198.

The San Felipe Del Rio Consolidated Independent School District (the "district"), which you represent, received a request for six categories of information concerning a former employee, including (1) all personnel records pertaining to the former employee's employment with the district; (2) all documents relating to reports, phone messages, handwritten notes, statements or memorandum that reflect a chronology of any reported alleged misconduct or any investigation performed by the district; (3) all documents relating to allegations lodged against the former employee; (4) all documents evidencing administrative reprimands or other disciplinary measures; (5) all documents relating to any "Settlement Agreements" made with the former employee; and (6) all reports made to and received from the Texas Department of Family and Protective Services. You claim that the requested information is excepted from disclosure under sections 552.101, 552.102, 552.107, 552.108, 552.114,

552.117, 552.122, 552.135, and 552.147 of the Government Code.¹ We have considered the exceptions you claim and reviewed the submitted information.

Initially, we must address the district's obligations under the Act, chapter 552 of the Government Code. Section 552.301(b) of the Government Code provides that a governmental body that wishes to withhold requested information must "ask for the attorney general's decision and state the exceptions that apply within a reasonable time but not later than the tenth business day after the date of receiving the written request." Gov't Code § 552.301(b). Section 552.301(e) provides that the governmental body must, within fifteen business days of receiving the request, submit to this office (1) written comments stating the reasons why the stated exceptions apply that would allow the information to be withheld, (2) a copy of the written request for information, (3) a signed statement or sufficient evidence showing the date the governmental body received the written request, and (4) a copy of the specific information requested or representative samples, labeled to indicate which exceptions apply to which parts of the documents. Gov't Code § 552.301(e)(1)(A)-(D). The district failed to raise section 552.122 of the Government Code within the ten business day deadline. Furthermore, although the district indicates that it maintains a copy of a report from the Texas Department of Family and Protective Services pertaining to the former employee, the district has failed to submit a copy of this document to our office.² Thus, the district has failed to comply with the procedural requirements of section 552.301 with respect to raising section 552.122 and the report at issue.

Pursuant to section 552.302 of the Government Code, a governmental body's failure to comply with the procedural requirements of section 552.301 results in the legal presumption

¹ You also raise sections 552.022, 552.024, and 552.305 of the Government Code. Section 552.022 provides a list of eighteen categories of information that are expressly public and may not be withheld unless confidential under other law. *See* Gov't Code § 552.022. Section 552.024 provides the manner in which an individual may choose to keep information confidential for purposes of section 552.117 of the Government Code. Gov't Code § 552.024. Section 552.305 permits a governmental body to rely on an interested third party to raise and explain the applicability of an exception to disclosure under the Act. Gov't Code § 552.305. Accordingly, none of these sections are exceptions to disclosure.

Although you also raise sections 552.1175, 552.132, and 552.137 of the Government Code, you have not provided any arguments in support of these claims. Thus, the district has not demonstrated that any of the submitted information is confidential for purposes of section 552.1175, 552.132, or 552.137. *See* Gov't Code § 552.301(e) (governmental body must provide comments explaining why exceptions raised should apply to information requested); *see also* Open Records Decision Nos. 665 at 2 n.5 (2000) (discretionary exceptions in general).

² You inform us that this information was not submitted because it is privileged and may not be disclosed. We note, however, that section 552.3035 expressly prohibits this office from disclosing information that is the subject of a request for an attorney general decision. *See* Gov't Code § 552.3035 (attorney general may not disclose to requestor or public information submitted under Gov't Code § 552.301(e)(1)(D)). Accordingly, this office routinely receives and reviews information that governmental bodies seek to withhold under the Act.

that the information is public and must be released. Information that is presumed public must be released unless a governmental body demonstrates a compelling reason to withhold the information to overcome this presumption. *See Hancock v. State Bd. of Ins.*, 797 S.W.2d 379, 381-82 (Tex. App.—Austin 1990, no writ) (governmental body must make compelling demonstration to overcome presumption of openness pursuant to statutory predecessor to Gov't Code § 552.302); Open Records Decision No. 319 (1982). A compelling reason exists when third-party interests are at stake, or when information is confidential under other law. Open Records Decision No. 150 (1977). Section 552.122 of the Government Code is a discretionary exception under the Act and does not demonstrate a compelling reason to withhold information from the public. *See Open Records Decision No. 665 at 2 n.5 (2000)* (discretionary exceptions in general). By failing to timely raise section 552.122, no portion of the submitted information can be withheld on this basis. Furthermore, although you raise section 552.101 of the Government Code for the report you failed to submit, and section 552.101 can provide a compelling reason to overcome the presumption of openness, because the district has not submitted the report for our review, we have no basis to find that this exception applies to that information. Thus, we have no choice but to order the district to release the report in accordance with section 552.302 of the Government Code. If the district believes the report is confidential and may not lawfully be released, it must challenge the ruling in court as outlined below.

Next, we note that Exhibit G contains a court record signed by a judge. Information filed with a court is generally a matter of public record and may not be withheld from disclosure unless it is confidential under other law. *See Gov't Code § 552.022(a)(17)*. We understand you to raise section 552.108 for this Exhibit. Section 552.108 of the Government Code is a discretionary exception that protects a governmental body's interests and is therefore not "other law" that makes court records confidential for purposes of section 552.022. *See Open Records Decision No. 177 (1977)* (governmental body may waive statutory predecessor to section 552.108); *see also Open Records Decision No. 522 at 4 (1989)* (discretionary exceptions in general). Thus, the court record in Exhibit G may not be withheld pursuant to section 552.108. As you raise no other exceptions for the court record, we determine that this record is not excepted from disclosure and must be released.

Section 552.101 of the Government Code excepts from disclosure "information considered to be confidential by law, either constitutional, statutory, or by judicial decision." Gov't Code § 552.101. This section encompasses information protected by other statutes. Chapter 261 of the Family Code is applicable to information used or developed in reports and investigations of alleged or suspected child abuse or neglect. Section 261.201 provides in part:

- (a) The following information is confidential, is not subject to public release under Chapter 552, Government Code, and may be disclosed only for purposes consistent with this code and applicable federal or state law or under rules adopted by an investigating agency:

(1) a report of alleged or suspected abuse or neglect made under this chapter and the identity of the person making the report; and

(2) except as otherwise provided in this section, the files, reports, records, communications, audiotapes, videotapes, and working papers used or developed in an investigation under this chapter or in providing services as a result of an investigation.

Fam. Code § 261.201(a). We have marked the information that was created by the district's police department as a result of an investigation into the alleged sexual assault of children. Because the information we have marked was used or developed in an investigation under chapter 261, it is within the scope of section 261.201 of the Family Code. You have not indicated that the district's police department has adopted a rule that governs the release of this type of information. Therefore, we assume that no such regulation exists. Given that assumption, the marked information is confidential pursuant to section 261.201 of the Family Code and must be withheld in its entirety from disclosure under section 552.101 of the Government Code. *See* Open Records Decision No. 440 at 2 (1986) (predecessor statute).³

Section 552.101 of the Government Code also encompasses information protected by federal statutes. The Family Educational Rights and Privacy Act of 1974 ("FERPA") provides that no federal funds will be made available under any applicable program to an educational agency or institution that releases personally identifiable information, other than directory information, contained in a student's education records to anyone but certain enumerated federal, state, and local officials and institutions, unless otherwise authorized by the student's parent. *See* 20 U.S.C. § 1232g(b)(1). "Education records" means those records that contain information directly related to a student and are maintained by an educational agency or institution or by a person acting for such agency or institution. *Id.* § 1232g(a)(4)(A). This office generally applies the same analysis under section 552.114 and FERPA. Open Records Decision No. 539 (1990).

Section 552.114 excepts from disclosure student records at an educational institution funded completely or in part by state revenue. Gov't Code § 552.114. Information must be withheld from required public disclosure under FERPA only to the extent "reasonable and necessary to avoid personally identifying a particular student." *See* Open Records Decision Nos. 332 (1982), 206 (1978). This information includes both information that directly identifies a student, as well as information that, if released, would allow the student's identity to be easily traced. *See* Open Records Decision No. 224 (1979) (finding student's handwritten comments protected under FERPA because they make identity of student easily traceable through handwriting, style of expression, or particular incidents related). Upon review of the

³ As this ruling is dispositive, we need not address your remaining arguments against the disclosure of this information.

submitted documents, the district must withhold the student identifying information it has marked in Exhibit D pursuant to FERPA.⁴

We note that the submitted documents in Exhibit E include Employment Eligibility Verifications I-9 Forms. An I-9 Form is governed by title 8, section 1324a of the United States Code, which provides that the form “may not be used for purposes other than for enforcement of this chapter” and for enforcement of other federal statutes governing crime and criminal investigations. 8 U.S.C. § 1324a(b)(5). Release of these documents under the Act would be “for purposes other than for enforcement” of the referenced federal statute. Accordingly, we conclude that the I-9 Forms are confidential for purposes of section 552.101 of the Government Code and may only be released in compliance with the federal laws and regulations governing the employment verification system.

We note that the submitted information in Exhibit E contains medical records. The Medical Practice Act (“MPA”), chapter 159 of the Occupations Code, governs access to medical record information. Section 159.002 provides in pertinent part:

(b) A record of the identity, diagnosis, evaluation, or treatment of a patient by a physician that is created or maintained by a physician is confidential and privileged and may not be disclosed except as provided by this chapter.

(c) A person who receives information from a confidential communication or record as described by this chapter, other than a person listed in Section 159.004 who is acting on the patient’s behalf, may not disclose the information except to the extent that disclosure is consistent with the authorized purposes for which the information was first obtained.

Occ. Code § 159.002(b), (c); *see* Open Records Decision No. 598 (1991). The MPA requires that any subsequent release of medical records be consistent with the purposes for which a governmental body obtained the records. Open Records Decision No. 565 at 7 (1990). Moreover, information that is subject to the MPA includes both medical records and information obtained from those medical records. *See* Occ. Code § 159.002(a), (b), (c); Open Records Decision No. 598 (1991). We have marked the medical records in Exhibit E that are subject to the MPA. Absent the applicability of an MPA access provision, the district must withhold this information pursuant to the MPA.

You also contend that a portion of the submitted information in Exhibit E is excepted under section 552.101 in conjunction with section 21.355 of the Education Code. Section 21.355 provides, “A document evaluating the performance of a teacher or administrator is confidential.” Educ. Code § 21.355. This office interpreted this section to apply to any

⁴As this ruling is dispositive, we need not address your remaining arguments against the disclosure of this information.

document that evaluates, as that term is commonly understood, the performance of a teacher or administrator. Open Records Decision No. 643 (1996). In that opinion, this office also determined that a teacher is someone who is required to hold and does hold a certificate or permit required under chapter 21 of the Education Code and is teaching at the time of the evaluation. *Id.* Similarly, an administrator is someone who is required to hold and does hold a certificate required under chapter 21 of the Education Code and is serving as an administrator at the time of the evaluation. *Id.* Based on the reasoning set out in Open Records Decision No. 643, we determine that the submitted documents we marked in Exhibit E are confidential under section 21.355 of the Education Code. Accordingly, the district must withhold this information pursuant to section 552.101 of the Government Code. We note, however, that the remaining evaluation pertains to a teacher's aide. Accordingly, as this document does not evaluate "the performance of a teacher or administrator" as defined by Open Records Decision No. 643, this information may not be withheld under section 21.355.

Next, you raise sections 552.101 and 552.102 of the Government Code in conjunction with both common-law and constitutional privacy. Section 552.102(a) excepts from disclosure "information in a personnel file, the disclosure of which would constitute a clearly unwarranted invasion of personal privacy." Gov't Code § 552.102(a). In *Hubert v. Harte-Hanks Texas Newspapers*, 652 S.W.2d 546 (Tex. App.—Austin 1983, writ ref'd n.r.e.), the court ruled that the test to be applied to information claimed to be protected under section 552.102 is the same as the test formulated by the Texas Supreme Court in *Industrial Foundation* for information claimed to be protected under the doctrine of common-law privacy as incorporated by section 552.101. *See Indus. Found. v. Tex. Indus. Accident Bd.*, 540 S.W.2d 668, 683-85 (Tex. 1976). Therefore, we will consider your section 552.101 and 552.102 claims together. Information must be withheld under section 552.101 in conjunction with common-law privacy if the information is highly intimate or embarrassing and it is of no legitimate concern to the public. *Indus. Found.*, 540 S.W.2d at 685.

Constitutional privacy consists of two interrelated types of privacy: (1) the right to make certain kinds of decisions independently and (2) an individual's interest in avoiding disclosure of personal matters. Open Records Decision No. 455 at 4 (1987). The first type protects an individual's autonomy within "zones of privacy" which include matters related to marriage, procreation, contraception, family relationships, and child rearing and education. *Id.* The second type of constitutional privacy requires a balancing between the individual's privacy interests and the public's need to know information of public concern. *Id.* The scope of information protected is narrower than that under the common-law doctrine of privacy; the information must concern the "most intimate aspects of human affairs." *Id.* at 5 (citing *Ramie v. City of Hedwig Village, Texas*, 765 F.2d 490 (5th Cir. 1985)).

This office has found that the following types of information are excepted from required public disclosure under constitutional or common-law privacy: some kinds of medical information or information indicating disabilities or specific illnesses, *see* Open Records

Decision Nos. 470 (1987) (illness from severe emotional and job-related stress), 455 (1987) (prescription drugs, illnesses, operations, and physical handicaps); personal financial information not relating to the financial transaction between an individual and a governmental body, *see* Open Records Decision Nos. 600 (1992), 545 (1990); information concerning the intimate relations between individuals and their family members, *see* Open Records Decision No. 470 (1987); and identities of victims of sexual abuse, *see* Open Records Decision Nos. 440 (1986), 393 (1983), 339 (1982). In this instance, the submitted information relates to the workplace conduct of an employee of the district. As this office has often noted, the public has a legitimate interest in information that relates to the workplace conduct of public officials and employees. *See* Open Records Decision Nos. 562 at 10 (1990) (personnel file information does not involve most intimate aspects of human affairs, but in fact touches on matters of legitimate public concern), 542 at 5 (1990) (information in public employee's resume not protected by constitutional or common-law privacy under statutory predecessors to sections 552.101 and 552.102), 470 at 4 (1987) (public employee's job performance does not generally constitute his or her private affairs), 444 at 3 (1986) (public has obvious interest in information concerning qualifications and performance of governmental employees), 405 at 2 (1983) (manner in which public employee performed his or her job cannot be said to be of minimal public interest), 400 at 5 (1983) (statutory predecessor to section 552.102 is "very narrow" and protects information only if release would lead to clearly unwarranted invasion of privacy). We have marked a small portion of the submitted information that relates to medical and financial privacy that the district must withhold under section 552.101 in conjunction with common-law privacy. However, none of the remaining submitted information may be withheld under sections 552.101 or 552.102 in conjunction with constitutional or common-law privacy.

Additionally, you assert that the submitted transcripts are subject to section 552.102(b) of the Government Code. Section 552.102(b) excepts from disclosure most information on a transcript from an institution of higher education maintained in the personnel files of professional public school employees. Gov't Code § 552.102(b). Section 552.102(b) excepts from disclosure all information from transcripts other than the employee's name, the courses taken, and the degree obtained. Open Records Decision No. 526 (1989). Thus, with the exception of the employee's name, the courses taken, and the degree obtained, the district must withhold the marked transcripts pursuant to section 552.102(b).

In addition, you claim that the documents in Exhibit H should be withheld under section 552.107 of the Government Code. Section 552.107 protects information coming within the attorney-client privilege. Gov't Code § 552.107. When asserting the attorney-client privilege, a governmental body has the burden of providing the necessary facts to demonstrate the elements of the privilege in order to withhold the information at issue. Open Records Decision No. 676 at 6-7 (2002).

First, a governmental body must demonstrate that the information constitutes or documents a communication. *Id.* at 7. Second, the communication must have been made "for the

purpose of facilitating the rendition of professional legal services” to the client governmental body. TEX. R. EVID. 503(b)(1). The privilege does not apply when an attorney or representative is involved in some capacity other than that of providing or facilitating professional legal services to the client governmental body. *In re Tex. Farmers Ins. Exch.*, 990 S.W.2d 337, 340 (Tex. App.—Texarkana 1999, orig. proceeding) (attorney-client privilege does not apply if attorney acting in capacity other than that of attorney). Governmental attorneys often act in capacities other than that of professional legal counsel, such as administrators, investigators, or managers. Thus, the mere fact that a communication involves an attorney for the government does not demonstrate this element. Third, the privilege applies only to communications between or among clients, client representatives, lawyers, and lawyer representatives. TEX. R. EVID. 503(b)(1)(A), (B), (C), (D), (E). Thus, a governmental body must inform this office of the identities and capacities of the individuals to whom each communication at issue has been made. Finally, the attorney-client privilege applies only to a confidential communication, *id.* 503(b)(1), meaning it was “not intended to be disclosed to third persons other than those to whom disclosure is made in furtherance of the rendition of professional legal services to the client or those reasonably necessary for the transmission of the communication.” *Id.* 503(a)(5).

Whether a communication meets this definition depends on the intent of the parties involved at the time the information was communicated. *Osborne v. Johnson*, 954 S.W.2d 180, 184 (Tex. App.—Waco 1997, no writ). Moreover, because the client may elect to waive the privilege at any time, a governmental body must explain that the confidentiality of a communication has been maintained. Section 552.107(1) generally excepts an entire communication that is demonstrated to be protected by the attorney-client privilege unless otherwise waived by the governmental body. *See Huie v. DeShazo*, 922 S.W.2d 920, 923 (Tex. 1996) (privilege extends to entire communication, including facts contained therein).

You state that the submitted communications in Exhibit H constitute confidential attorney-client communications between the district superintendent, the president of the board of trustees, and the district’s attorney. You further contend that these communications were made for the purpose of facilitating the rendition of professional legal services and were intended to be confidential. Having considered these representations and the information at issue, we find that the district has established that the submitted communications in Exhibit H constitute privileged attorney-client communications that may be withheld pursuant to section 552.107 of the Government Code.

We also note that the submitted documents contain information that may be excepted from disclosure pursuant to section 552.117 of the Government Code. Section 552.117(a)(1) excepts from disclosure the home addresses and telephone numbers, social security numbers, and family member information of current or former officials or employees of a governmental body who timely request that this information be kept confidential under section 552.024 of the Government Code. *See Gov’t Code* § 552.117(a)(1). We note that a post office box

number is not a "home address" for purposes of section 552.117.⁵ However, information that is responsive to a request may not be withheld from disclosure under section 552.117(a)(1) if the employee did not request confidentiality for this information in accordance with section 552.024 or if the request for confidentiality under section 552.024 was not made until after the request for information was received by the governmental body. Whether a particular piece of information is public must be determined at the time the request is received by the governmental body. *See* Open Records Decision No. 530 at 5 (1989). The submitted documents contain information pertaining to the former employee as well as other individuals who appear to be employed by the district. If the former employee timely elected to keep her personal information confidential, the district must withhold the information pertaining to her which we have marked under section 552.117(a)(1) of the Government Code. Furthermore, if the additional information we have marked relates to district employees who have timely elected to keep their personal information confidential, the district must also withhold this marked information under section 552.117. The district may not withhold any information under section 552.117(a)(1) if the employees did not make timely elections to keep their information confidential.

Regardless of whether section 552.117 applies, the social security numbers in the submitted information are confidential under section 552.147 of the Government Code which provides that "[t]he social security number of a living person is excepted from" required public disclosure under the Act. Gov't Code § 552.147. Therefore, the district must withhold the social security numbers contained in the remaining submitted information under section 552.147.

Next, we note that Exhibit E contains Texas driver's license numbers that are confidential under section 552.130 of the Government Code. Section 552.130 of the Government Code excepts from disclosure information that "relates to . . . a motor vehicle operator's or driver's license or permit issued by an agency of this state [or] a motor vehicle title or registration issued by an agency of this state." Gov't Code § 552.130. In accordance with section 552.130 of the Government Code, the district must withhold the Texas driver's license information we have marked in Exhibit E.

Finally, we note that Exhibit E includes an account number that is confidential under section 552.136 of the Government Code. Section 552.136 states that "[n]otwithstanding any other provision of this chapter, a credit card, debit card, charge card, or access device number that is collected, assembled, or maintained by or for a governmental body is confidential." Gov't Code § 552.136. Thus, pursuant to this section, the district must withhold the account number we have marked in Exhibit E.

⁵See Gov't Code § 552.117; Open Records Decision No. 622 at 4 (1994) (legislative history makes clear that purpose of Gov't Code § 552.117 is to protect public employees from being harassed *at home*) (citing House Committee on State Affairs, Bill Analysis, H.B. 1976, 69th Leg. (1985); Senate Committee on State Affairs, Bill Analysis, H.B. 1976, 69th Leg. (1985)) (emphasis added).

In conclusion, the district must withhold (1) the information marked under section 552.101 in conjunction with section 261.201 of the Family Code, (2) the student identifying information marked in Exhibit D under section 552.101 in conjunction with FERPA, (3) the Employment Eligibility Verification I-9 forms in Exhibit E under section 552.101 of the Government Code in conjunction with title 8, section 1324a of the United States Code, (4) the medical records marked in Exhibit E under section 552.101 of the Government Code in conjunction with the MPA, (5) the teacher evaluations marked under section 552.101 of the Government Code in conjunction with section 21.355 of the Education Code, (6) the documents marked in Exhibit E pursuant to common-law privacy, and (7) the marked transcripts in Exhibit E pursuant to section 552.102(b) of the Government Code. If the former employee timely elected to keep her personal information confidential, the district must withhold the information marked under section 552.117(a)(1) of the Government Code. Furthermore, if the additional information marked relates to district employees who have timely elected to keep their personal information confidential, the district must also withhold this marked information under section 552.117. Regardless of whether section 552.117 applies, the district must withhold social security numbers under section 552.147 of the Government Code. In addition, the district must withhold marked Texas driver's license information under section 552.130 of the Government Code and the marked checking account information under section 552.136 of the Government Code. The district may withhold the confidential communications in Exhibit H under section 552.107 of the Government Code. The remaining information must be released.

This letter ruling is limited to the particular records at issue in this request and limited to the facts as presented to us; therefore, this ruling must not be relied upon as a previous determination regarding any other records or any other circumstances.

This ruling triggers important deadlines regarding the rights and responsibilities of the governmental body and of the requestor. For example, governmental bodies are prohibited from asking the attorney general to reconsider this ruling. Gov't Code § 552.301(f). If the governmental body wants to challenge this ruling, the governmental body must appeal by filing suit in Travis County within 30 calendar days. *Id.* § 552.324(b). In order to get the full benefit of such an appeal, the governmental body must file suit within 10 calendar days. *Id.* § 552.353(b)(3), (c). If the governmental body does not appeal this ruling and the governmental body does not comply with it, then both the requestor and the attorney general have the right to file suit against the governmental body to enforce this ruling. *Id.* § 552.321(a).

If this ruling requires the governmental body to release all or part of the requested information, the governmental body is responsible for taking the next step. Based on the statute, the attorney general expects that, upon receiving this ruling, the governmental body will either release the public records promptly pursuant to section 552.221(a) of the Government Code or file a lawsuit challenging this ruling pursuant to section 552.324 of the Government Code. If the governmental body fails to do one of these things, then the

requestor should report that failure to the attorney general's Open Government Hotline, toll free, at (877) 673-6839. The requestor may also file a complaint with the district or county attorney. *Id.* § 552.3215(e).

If this ruling requires or permits the governmental body to withhold all or some of the requested information, the requestor can appeal that decision by suing the governmental body. *Id.* § 552.321(a); *Texas Dep't of Pub. Safety v. Gilbreath*, 842 S.W.2d 408, 411 (Tex. App.—Austin 1992, no writ).

Please remember that under the Act the release of information triggers certain procedures for costs and charges to the requestor. If records are released in compliance with this ruling, be sure that all charges for the information are at or below the legal amounts. Questions or complaints about over-charging must be directed to Hadassah Schloss at the Office of the Attorney General at (512) 475-2497.

If the governmental body, the requestor, or any other person has questions or comments about this ruling, they may contact our office. Although there is no statutory deadline for contacting us, the attorney general prefers to receive any comments within 10 calendar days of the date of this ruling.

Sincerely,



Anne Prentice
Assistant Attorney General
Open Records Division

AP/sdk

Ref: ID# 245198

Enc. Submitted documents

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