



ATTORNEY GENERAL OF TEXAS

GREG ABBOTT

September 10, 2008

Mr. James G. Nolan  
Assistant General Counsel, Open Records  
Texas Comptroller of Public Accounts  
P.O. Box 13528  
Austin, Texas 78711-3528

OR2008-12499

Dear Mr. Nolan:

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# 321265.

The Texas Comptroller of Public Accounts (the "comptroller") received a request for information relating to the Aegis Texas Venture Fund I ("Aegis"). You state that social security numbers will be redacted from the responsive information pursuant to section 552.147 of the Government Code.<sup>1</sup> You state that some of the requested information will be released. You inform us that some of the submitted information may be encompassed by previous open records letter rulings. You claim that some of the submitted information is excepted from disclosure under sections 552.101, 552.111, 552.116, 552.136, and 552.137 of the Government Code.<sup>2</sup> Although you take no position on the public availability of the rest of the submitted information, you believe that the information may implicate the interests of Aegis. You notified Aegis of this request for information and its

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<sup>1</sup>Section 552.147(b) authorizes a governmental body to redact a living person's social security number from public release without the necessity of requesting a decision from this office under the Act. The requestor has a right, however, to his client's social security number. *See generally* Gov't Code § 552.023(b) (governmental body may not deny access to person to whom information relates, or that person's representative, solely on grounds that information is considered confidential by privacy principles).

<sup>2</sup>We note that the comptroller has marked some of the submitted information as not being responsive to this request for information. We have marked other information that is also not responsive to the request. This decision does not address the public availability of the non-responsive information, and that information need not be released.

right to submit arguments to this office as to why information relating to Aegis should not be released.<sup>3</sup> We received arguments from an attorney for Aegis under sections 552.101, 552.104, 552.110, 552.112, and 552.143 of the Government Code. We have considered all of the submitted arguments and reviewed the submitted information.<sup>4</sup>

Initially, we address the comptroller's representation that some of the submitted information may be encompassed by Open Records Letter Nos. 2007-11225 (2007), 2005-08394 (2005), 2005-08056A (2005), and 2005-07465 (2005). You do not indicate that there has been any change in the law, facts, and circumstances on which the previous rulings are based. Therefore, to the extent that the submitted information is encompassed by Open Records Letter Nos. 2007-11225, 2005-08394, 2005-08056A, and 2005-07465, the comptroller must dispose of any such information in accordance with those rulings. *See* Gov't Code § 552.301(a); Open Records Decision No. 673 at 6-7 (2001) (listing elements of first type of previous determination under Gov't Code § 552.301(a)). To the extent that the submitted information is not encompassed by our previous decisions, we will address the submitted arguments against its disclosure.

Next, we address Aegis's concern that this request for "any and all records" relating to Aegis is unreasonably broad and unnecessarily vague. We note that a governmental body must make a good-faith effort to relate a request for information under the Act to any responsive information that is within the governmental body's possession or control. *See* Open Records Decision No. 561 at 8-9 (1990). In this instance, the comptroller has submitted information that is deemed to be responsive to the request. Accordingly, we will determine whether the exceptions claimed by the comptroller and Aegis are applicable to the submitted information.

We note that the comptroller failed to submit some of the information at issue to this office within the fifteen-business-day period prescribed by section 552.301 of the Government Code. *See* Gov't Code § 552.301(e)(1)(D). That information is therefore presumed to be public and must be released, unless there is a compelling reason to withhold any of the information. *See id.* § 552.302; *Hancock v. State Bd. of Ins.*, 797 S.W.2d 379, 381 (Tex. App.—Austin 1990, no writ). The comptroller believes that the information in question may implicate the interests of Aegis, whose interests can provide a compelling reason for non-disclosure under section 552.302. *See* Open Records Decision Nos. 630 at 3 (1994), 325 at 2 (1982). Therefore, we will determine whether any of the information that was not timely submitted must be withheld on that basis.

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<sup>3</sup>*See* Gov't Code § 552.305(d); Open Records Decision No. 542 (1990) (statutory predecessor to Gov't Code § 552.305 permitted governmental body to rely on interested third party to raise and explain applicability of exception to disclosure under certain circumstances).

<sup>4</sup>This letter ruling assumes that the submitted representative samples of information are truly representative of the requested information as a whole. This ruling neither reaches nor authorizes the comptroller to withhold any information that is substantially different from the submitted information. *See* Gov't Code §§ 552.301(e)(1)(D), .302; Open Records Decision Nos. 499 at 6 (1988), 497 at 4 (1988).

We begin with the comptroller's exceptions to disclosure. Section 552.101 of the Government Code excepts "information considered to be confidential by law, either constitutional, statutory, or by judicial decision." Gov't Code § 552.101. The comptroller raises section 552.101 in conjunction with common-law privacy, which protects information that is highly intimate or embarrassing, such that its release would be highly objectionable to a person of ordinary sensibilities, and of no legitimate public interest. *See Indus. Found. v. Tex. Indus. Accident Bd.*, 540 S.W.2d 668, 685 (Tex. 1976). Common-law privacy encompasses the specific types of information that are held to be intimate or embarrassing in *Industrial Foundation*. *See id.* at 683 (information relating to sexual assault, pregnancy, mental or physical abuse in workplace, illegitimate children, psychiatric treatment of mental disorders, attempted suicide, and injuries to sexual organs). This office has determined that other types of information also are private under section 552.101. *See generally* Open Records Decision No. 659 at 4-5 (1999) (summarizing information attorney general has held to be private). You have marked medical information that the comptroller seeks to withhold under section 552.101. We find that the information in question is neither intimate nor embarrassing. We therefore conclude that the comptroller may not withhold that information under section 552.101 in conjunction with common-law privacy.

Common-law privacy also encompasses certain types of personal financial information. Personal financial information that is related only to an individual ordinarily satisfies the first element of the common-law privacy test, but the public has a legitimate interest in the essential facts about a financial transaction between an individual and a governmental body. *See* Open Records Decision Nos. 545 at 4 (1990) (attorney general has found kinds of financial information not excepted from public disclosure by common-law privacy to generally be those regarding receipt of governmental funds or debts owed to governmental entities), 523 at 4 (1989) (noting distinction under common-law privacy between confidential background financial information furnished to public body about individual and basic facts regarding particular financial transaction between individual and public body).

You also have marked financial information that the comptroller believes may be private. We note that the information in question is related to a business entity. Common-law privacy protects the interests of individuals, not those of business and governmental entities. *See* Open Records Decision Nos. 620 (1993) (corporation has no right to privacy), 192 (1978) (right to privacy is designed primarily to protect human feelings and sensibilities, rather than property, business, or other pecuniary interests); *see also United States v. Morton Salt Co.*, 338 U.S. 632, 652 (1950) (cited in *Rosen v. Matthews Constr. Co.*, 777 S.W.2d 434 (Tex. App.—Houston [14th Dist.] 1989), *rev'd on other grounds*, 796 S.W.2d 692 (Tex. 1990)) (corporation has no right to privacy). We therefore conclude that the marked financial information is not private and may not be withheld on that basis under section 552.101 of the Government Code. We also conclude, however, that some of the remaining documents contain personal financial information relating to private individuals that is intimate or embarrassing and not a matter of legitimate public interest. The comptroller must withhold that information, which we have marked, under section 552.101 in conjunction with common-law privacy.

Section 552.111 of the Government Code excepts from disclosure “an interagency or intraagency memorandum or letter that would not be available by law to a party in litigation with the agency.” Gov’t Code § 552.111. This exception encompasses the deliberative process privilege. See Open Records Decision No. 615 at 2 (1993). The purpose of section 552.111 is to protect advice, opinion, and recommendation in the decisional process and to encourage open and frank discussion in the deliberative process. See *Austin v. City of San Antonio*, 630 S.W.2d 391, 394 (Tex. App.—San Antonio 1982, no writ); Open Records Decision No. 538 at 1-2 (1990). In Open Records Decision No. 615, this office re-examined the statutory predecessor to section 552.111 in light of the decision in *Texas Department of Public Safety v. Gilbreath*, 842 S.W.2d 408 (Tex. App.—Austin 1992, no writ). We determined that section 552.111 excepts from disclosure only those internal communications that consist of advice, recommendations, and opinions that reflect the policymaking processes of a governmental body. See ORD 615 at 5. A governmental body’s policymaking functions do not encompass routine internal administrative or personnel matters, and disclosure of information about such matters will not inhibit free discussion of policy issues among agency personnel. *Id.*; see also *City of Garland v. The Dallas Morning News*, 22 S.W.3d 351 (Tex. 2000) (Gov’t Code § 552.111 not applicable to personnel-related communications that did not involve policymaking). A governmental body’s policymaking functions do include administrative and personnel matters of broad scope that affect the governmental body’s policy mission. See Open Records Decision No. 631 at 3 (1995). Moreover, section 552.111 does not protect facts and written observations of facts and events that are severable from advice, opinions, and recommendations. See ORD 615 at 5. But if factual information is so inextricably intertwined with material involving advice, opinion, or recommendation as to make severance of the factual data impractical, the factual information also may be withheld under section 552.111. See Open Records Decision No. 313 at 3 (1982).

You have marked information that the comptroller seeks to withhold under section 552.111. We note that the information in question is essentially factual. Having considered your arguments, we find that you have not demonstrated that the marked information implicates the comptroller’s policymaking processes. We therefore conclude that the comptroller may not withhold any of the marked information under section 552.111 of the Government Code.

Section 552.116 of the Government Code provides as follows:

(a) An audit working paper of an audit of the state auditor or the auditor of a state agency, an institution of higher education as defined by Section 61.003, Education Code, a county, a municipality, a school district, or a joint board operating under Section 22.074, Transportation Code, including any audit relating to the criminal history background check of a public school employee, is excepted from [required public disclosure]. If information in an audit working paper is also maintained in another record, that other record is not excepted from [public disclosure] by this section.

(b) In this section:

(1) "Audit" means an audit authorized or required by a statute of this state or the United States, the charter or an ordinance of a municipality, an order of the commissioners court of a county, a resolution or other action of a board of trustees of a school district, including an audit by the district relating to the criminal history background-check of a public-school-employee, or a resolution or other action of a joint board described by Subsection (a) and includes an investigation.

(2) "Audit working paper" includes all information, documentary or otherwise, prepared or maintained in conducting an audit or preparing an audit report, including:

(A) intra-agency and interagency communications; and

(B) drafts of the audit report or portions of those drafts.

Gov't Code § 552.116. You contend that some of the submitted information consists of audit working papers. You state that the comptroller prepared or maintains the information at issue in connection with an annual review conducted under article 4.61 of the Insurance Code. Article 4.61(a) provides that "[t]he comptroller shall conduct an annual review of each certified capital company[.]" Ins. Code art. 4.61(a); *see id.* 4.51(4) (defining "certified capital company"). Article 4.61 states that the purposes of the annual review are to "ensure that the company continues to satisfy the requirements of this subchapter and that the company has not made any investments in violation of this subchapter" and to "determine the eligibility status of its qualified investments." Ins. Code art. 4.61(a)(1)-(2). Based on your representations, we find that the information at issue constitutes audit working papers for the purposes of section 552.116 of the Government Code. *See* Gov't Code § 552.116(b)(2). We therefore conclude that the comptroller may withhold that information, which we have marked, under section 552.116.

Section 552.136 of the Government Code states that "[n]otwithstanding any other provision of [the Act], 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." *Id.* § 552.136(b); *see id.* § 552.136(a) (defining "access device"). You have marked information that the comptroller seeks to withhold under this exception. You state that the information in question consists of bank account and wire transfer numbers. Based on your representation, we conclude that the comptroller must withhold the marked information under section 552.136 of the Government Code. We have marked other bank account numbers that the comptroller also must withhold under this exception. We note that some of the remaining documents, which we have marked, also appear to contain bank account and wire transfer numbers. Any bank account and wire transfer numbers contained in those documents must also be withheld under section 552.136.

Section 552.137 of the Government Code states that “an e-mail address of a member of the public that is provided for the purpose of communicating electronically with a governmental body is confidential and not subject to disclosure under [the Act],” unless the owner of the e-mail address has affirmatively consented to its public disclosure. *Id.* § 552.137(a)-(b). The types of e-mail addresses listed in section 552.137(c) may not be withheld under this exception. *See id.* § 552.137(c). Likewise, section 552.137 is not applicable to an institutional e-mail address, an Internet website address, or an e-mail address that a governmental entity maintains for one of its officials or employees. You have marked e-mail addresses that the comptroller seeks to withhold under section 552.137. You state that the owners of the marked e-mail addresses have not consented to their public disclosure. Based on your representations, we conclude that the comptroller must withhold the e-mail addresses that you have marked, as well as the e-mail addresses that we have marked, under section 552.137 of the Government Code. We also have marked a representative sample of other e-mail addresses contained in the submitted documents that must also be withheld under section 552.137, unless the owner of an e-mail address has consented to its disclosure. We note the remaining documents also contain the personal e-mail address of an individual whom Aegis has identified as the requestor’s client. Because section 552.137 protects personal privacy, the requestor has a right of access to his client’s e-mail address under section 552.023 of the Government Code. *See id.* § 552.023(a). Therefore, the comptroller may not withhold the client’s e-mail address from this requestor under section 552.137. *See Open Records Decision No. 481 at 4 (1987) (privacy theories not implicated when individual requests information concerning himself).*<sup>5</sup>

We note that the comptroller may be required to withhold some of the remaining information under section 552.117 of the Government Code.<sup>6</sup> Section 552.117(a)(1) excepts from disclosure the home address and telephone number, social security number, and family member information of a current or former official or employee of a governmental body who requests that this information be kept confidential under section 552.024 of the Government Code. Whether a particular item of information is protected by section 552.117(a)(1) must be determined at the time of the governmental body’s receipt of the request for the information. *See Open Records Decision No. 530 at 5 (1989)*. Thus, information may only be withheld under section 552.117(a)(1) on behalf of a current or former official or employee who made a request for confidentiality under section 552.024 prior to the date of the governmental body’s receipt of the request for the information. Information may not be withheld under section 552.117(a)(1) on behalf of a current or former official or employee who did not timely request under section 552.024 that the information be kept confidential. We have marked information that the comptroller must withhold under section 552.117(a)(1)

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<sup>5</sup>Section 552.023 provides in part that “[a] person or a person’s authorized representative has a special right of access, beyond the right of the general public, to information held by a governmental body that relates to the person and that is protected from public disclosure by laws intended to protect that person’s privacy interests.” Gov’t Code § 552.023(a).

<sup>6</sup>Unlike other exceptions to disclosure under the Act, this office will raise section 552.117 on behalf of a governmental body, as this exception is mandatory and may not be waived. *See Gov’t Code §§ 552.007, 352; Open Records Decision No. 674 at 3 n.4 (2001) (mandatory exceptions)*.

of the Government Code if the information is related to a current or former employee of the comptroller who timely requested confidentiality for the information under section 552.024 of the Government Code.

Turning to Aegis's exceptions to disclosure, we note that Aegis raises sections 552.104 and 552.112 of the Government Code. Those exceptions protect the interests of governmental bodies, not those of private parties such as Aegis.<sup>7</sup> See Gov't Code § 552.007; *Birnbaum v. Alliance of Am. Insurers*, 994 S.W.2d 766, 776 (Tex. App.—Austin 1999, pet. denied) (Gov't Code § 552.112 is discretionary exception that may be waived); Open Records Decision Nos. 665 at 2 n.5 (2000) (discretionary exceptions generally), 592 at 8 (1991) (addressing statutory predecessor to Gov't Code § 552.104). Thus, because the comptroller does not claim either of those exceptions, none of the remaining information may be withheld under section 552.104 or section 552.112 of the Government Code. However, we will address the other exceptions that Aegis claims.

Section 552.101 of the Government Code encompasses information that is considered to be confidential under other constitutional, statutory, or decisional law. See Gov't Code § 552.101; Open Records Decision Nos. 600 at 4 (1992) (constitutional privacy), 478 at 2 (1987) (statutory confidentiality), 611 at 1 (1992) (common-law privacy). Aegis has not directed our attention to any law under which any of the remaining information is considered to be confidential for the purposes of section 552.101. We therefore conclude that the comptroller may not withhold any of the remaining information under section 552.101 of the Government Code.

Section 552.110 of the Government Code protects the proprietary interests of private parties with respect to two types of information: (1) “[a] trade secret obtained from a person and privileged or confidential by statute or judicial decision,” and (2) “commercial or financial information for which it is demonstrated based on specific factual evidence that disclosure would cause substantial competitive harm to the person from whom the information was obtained.” Gov't Code § 552.110(a)-(b).

The Texas Supreme Court has adopted the definition of a “trade secret” from section 757 of the Restatement of Torts, which holds a “trade secret” to be

any formula, pattern, device or compilation of information which is used in one's business, and which gives him an opportunity to obtain an advantage over competitors who do not know or use it. It may be a formula for a chemical compound, a process of manufacturing, treating or preserving materials, a pattern for a machine or other device, or a list of customers. It differs from other secret information in a business . . . in that it is not

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<sup>7</sup>Section 552.104 excepts from disclosure “information that, if released, would give advantage to a competitor or bidder.” Gov't Code § 552.104(a). Section 552.112 excepts “information contained in or relating to examination, operating, or condition reports prepared by or for an agency responsible for the regulation or supervision of financial institutions or securities, or both.” *Id.* § 552.112(a).

simply information as to a single or ephemeral event in the conduct of the business . . . . A trade secret is a process or device for continuous use in the operation of the business . . . . [It may] relate to the sale of goods or to other operations in the business, such as a code for determining discounts, rebates or other concessions in a price list or catalogue, or a list of specialized customers, or a method of bookkeeping or other office management.

RESTATEMENT OF TORTS § 757 cmt. b (1939); *see also Hyde Corp. v. Huffines*, 314 S.W.2d 763, 776 (Tex. 1958). If a governmental body takes no position on the application of the "trade secrets" aspect of section 552.110 to the information at issue, this office will accept a private person's claim for exception as valid under section 552.110(a) if the person establishes a *prima facie* case for the exception, and no one submits an argument that rebuts the claim as a matter of law.<sup>8</sup> *See* Open Records Decision No. 552 at 5 (1990). However, we cannot conclude that section 552.110(a) is applicable unless it has been shown that the information meets the definition of a trade secret, and the necessary factors have been demonstrated to establish a trade secret claim. *See* Open Records Decision No. 402 (1983).

Section 552.110(b) requires a specific factual or evidentiary showing, not conclusory or generalized allegations, that substantial competitive injury would likely result from release of the information at issue. *See also* Open Records Decision No. 661 at 5-6 (1999) (business enterprise must show by specific factual evidence that release of information would cause it substantial competitive harm).

Aegis contends that the remaining information contains trade secrets that are protected by section 552.110(a). Aegis also argues that some of the remaining information must be withheld under section 552.110(b). Having considered all of Aegis's arguments, we have marked information that the comptroller must withhold under section 552.110(b). We note that some of the remaining information is available to the public on Internet websites. We are unable to conclude that information published on the Internet constitutes a trade secret or that the release of such information under the Act would cause substantial competitive harm. Thus, section 552.110 is not applicable to such information. We also find that Aegis

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<sup>8</sup>The Restatement of Torts lists the following six factors as indicia of whether information constitutes a trade secret:

- (1) the extent to which the information is known outside of [the company];
- (2) the extent to which it is known by employees and other involved in [the company's] business;
- (3) the extent of measures taken by [the company] to guard the secrecy of the information;
- (4) the value of the information to [the company] and [its] competitors;
- (5) the amount of effort or money expended by [the company] in developing the information;
- (6) the ease or difficulty with which the information could be properly acquired or duplicated by others.

RESTATEMENT OF TORTS § 757 cmt. b (1939); *see also* Open Records Decision Nos. 319 at 2 (1982), 306 at 2 (1982), 255 at 2 (1980).

has neither demonstrated that any of the remaining information at issue qualifies as a trade secret under section 552.110(a) nor made the factual or evidentiary showing required by section 552.110(b) that release of any of the remaining information would cause substantial competitive harm. We therefore conclude that the comptroller may not withhold any of the remaining information under section 552.110 of the Government Code. *See* Gov't Code § 552.110(a)-(b); ORD 552-at 5; 661-at 5-6; *see also* Open Records Decision No. 319-at 3 (1982) (statutory predecessor to Gov't Code § 552.110 generally not applicable to information relating to organization and personnel, market studies, professional references, qualifications and experience, and pricing).

Aegis also raises section 552.143 of the Government Code, which provides in part that “[a]ll information prepared or provided by a private investment fund and held by a governmental body that is not listed in Section 552.0225(b) [of the Government Code] is confidential and excepted from [required public disclosure].” Gov't Code § 552.143(a). Section 552.143(d)(1) defines a private investment fund as “an entity, other than a governmental body, that issues restricted securities to a governmental body to evidence the investment of public funds for the purpose of reinvestment.” *Id.* § 552.143(d)(1). We find that none of the remaining information was prepared or provided to the comptroller by a private investment fund, as defined by section 552.143(d)(1). We therefore conclude that the comptroller may not withhold any of the remaining information under section 552.143 of the Government Code.

We note that some of the remaining information appears to be protected by copyright. A governmental body must allow inspection of copyrighted information unless an exception to disclosure applies to the information. *See* Attorney General Opinion JM-672 (1987). An officer for public information also must comply with copyright law, however, and is not required to furnish copies of copyrighted information. *Id.* A member of the public who wishes to make copies of copyrighted information must do so unassisted by the governmental body. In making copies, the member of the public assumes the duty of compliance with the copyright law and the risk of a copyright infringement suit. *See* Open Records Decision No. 550 at 8-9 (1990).

In summary: (1) the comptroller must dispose of any submitted information that is encompassed by Open Records Letter Nos. 2007-11225, 2005-08394, 2005-08056A, and 2005-07465 in accordance with those rulings; (2) the comptroller must withhold the personal financial information that we have marked under section 552.101 of the Government Code in conjunction with common-law privacy; (3) the comptroller may withhold the information that we have marked under section 552.116 of the Government Code; (4) the bank account and wire transfer numbers must be withheld under section 552.136 of the Government Code, including the information that the comptroller has marked, the bank account numbers that we have marked, and any bank account and wire transfer numbers contained in the documents that we have marked; (5) personal e-mail addresses must be withheld under section 552.137 of the Government Code, including the e-mail addresses that the comptroller has marked and the types of e-mail addresses that we have marked, unless the owner of an e-mail address has consented to its disclosure; (6) the

comptroller must withhold the information that we have marked under section 552.117(a)(1) of the Government Code if the information is related to a current or former employee who timely requested confidentiality for the information under section 552.024 of the Government Code; and (7) the comptroller must withhold the information that we have marked under section 552.110 of the Government Code. The rest of the submitted information must be released. Any information that is protected by copyright may only be released in accordance with copyright law.

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 file suit in Travis County within 30 calendar days. *Id.* § 552.324(b). In order to get the full benefit of such a challenge, the governmental body must file suit within 10 calendar days. *Id.* § 552.353(b)(3). If the governmental body does not file suit over 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).

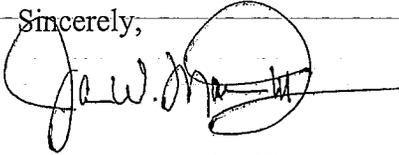
If this ruling requires the governmental body to release all or part of the requested information, the governmental body is responsible for taking the next step. Based on the statute, the attorney general expects that, upon receiving this ruling, the governmental body will either release the public records 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 challenge 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,

A handwritten signature in black ink, appearing to read "J.W. Morris, III". The signature is written in a cursive style with a large, circular flourish at the end.

James W. Morris, III  
Assistant Attorney General  
Open Records Division

JWM/jh

Ref: ID# 321265

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