



ATTORNEY GENERAL OF TEXAS  
GREG ABBOTT

September 11, 2008

Ms. Carol Longoria  
The University of Texas System  
Office of the General Counsel  
201 West Seventh Street  
Austin, Texas 78701-2902

OR2008-12551

Dear Ms. Longoria:

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# 320011.

The University of Texas Medical Branch at Galveston (the "university") received a request for the following information: (1) all documents detailing business, food, travel, and entertainment expenditures of management personnel to the Chairmen of Departments and their managers, including the President and Provost of the university since January 1, 2008; (2) electronic records detailing the expenditures of current grants of \$250,000 or more; (3) documents detailing any conflict of interest or disclosure statements filed by any doctor of the university since January 1, 2005, detailing any payments from any drug company or other third party; (4) documents detailing any expenditures on credit cards issued by the university to any employee since January 1, 2007; and (5) all e-mails sent or received by six employees from January 1, 2008 through June 9, 2008.<sup>1</sup> You state that you will release the information responsive to item 4 of the request, and you will handle release of information responsive to item 1 of the request directly with the requestor. You argue that some of the requested information is not subject to the Act. You claim that the submitted information, responsive to items 2, 3, and 5 of the request, is excepted from disclosure under

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<sup>1</sup>We note that the university asked for and received clarification regarding items 1, 2, and 5 of this request. *See* Gov't Code § 552.222(b) (governmental body may communicate with requestor for purpose of clarifying or narrowing request for information); *see also* Open Records Decision No. 663 (1999) (discussing tolling of deadlines during period in which governmental body is awaiting clarification).

sections 552.101, 552.107, 552.111, 552.1235, 552.116, 552.117, 552.136, and 552.137 of the Government Code. We have considered the exceptions you claim and reviewed the submitted representative samples of information.<sup>2</sup> We have also considered the requestor's arguments. *See* Gov't Code § 552.304.

Initially, you claim that the representative sample of e-mails submitted in Tab 10 are not subject to the Act. The Act is only applicable to "public information." *See id.* § 552.021. Section 552.002(a) defines public information as "information that is collected, assembled, or maintained under a law or ordinance or in connection with the transaction of official business: (1) by a governmental body; or (2) for a governmental body and the governmental body owns the information or has a right of access to it." *Id.* § 552.022(a). Thus, virtually all information that is in a governmental body's physical possession constitutes public information that is subject to the Act. *Id.* § 552.022(a)(1); *see also* Open Records Decision Nos. 549 at 4 (1990), 514 at 1-2 (1988). The university contends that the e-mails submitted in Tab 10 are purely personal in nature and are unrelated to official university business. The requestor argues that requiring disclosure of all government emails will assist the public in deciding whether government resources are used properly. The requestor further argues that to the extent the emails raise questions about whether a government employee has fulfilled his or her duties, they should be considered public information. However, public information subject to the Act does not include personal information unrelated to official business created or maintained by a state employee involving a minimal use of state resources. *See* Open Records Decision No. 635 (1995). Thus, after reviewing the information at issue, we agree that the e-mails submitted in Tab 10 are not related to the university's official business. Consequently, these emails are not subject to the Act and need not be disclosed to the requestor.<sup>3</sup> *See id.*

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 exception encompasses information that other statutes make confidential. You contend that some of the submitted information is confidential under section 161.032 of the Health and Safety Code. Section 161.032(a) makes confidential the "records and proceedings of a medical committee." Health & Safety Code § 161.032(a). A "medical committee" is defined as any committee, including a joint committee of a hospital, medical organization, university medical school or health science center, health maintenance organization, or extended care facility. *See id.* § 161.031(a). The term also

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<sup>2</sup>We assume that the "representative samples" of records submitted to this office is truly representative of the requested records as a whole. *See* Open Records Decision Nos. 499 (1988), 497 (1988). This open records letter does not reach, and therefore does not authorize the withholding of, any other requested records to the extent that those records contain substantially different types of information than that submitted to this office.

<sup>3</sup>As our ruling is dispositive for the information in Tab 10, we need not address your remaining arguments against disclosure for this information.

encompasses “a committee appointed ad hoc to conduct a specific investigation or established under state or federal law or rule or under the bylaws or rules of the organization or institution.” *Id.* § 161.031(b).

The precise scope of the “medical committee” provision has been the subject of a number of judicial decisions. *See Memorial Hosp.—The Woodlands v. McCown*, 927 S.W.2d 1 (Tex. 1996); *Barnes v. Whittington*, 751 S.W.2d 493 (Tex. 1988); *Jordan v. Fourth Supreme Judicial Dist.*, 701 S.W.2d 644 (Tex. 1986); *Hood v. Phillips*, 554 S.W.2d 160 (Tex. 1977); *Texarkana Memorial Hosp., Inc. v. Jones*, 551 S.W.2d 33 (Tex. 1977); *McAllen Methodist Hosp. v. Ramirez*, 855 S.W.2d 195 (Tex. App. — Corpus Christi 1993), *disapproved by, Memorial Hosp. — The Woodlands v. McCown*, 927 S.W.2d 1 (Tex. 1996); *Doctor’s Hosp. v. West*, 765 S.W.2d 812 (Tex. App. — Houston [1st Dist.] 1988); *Goodspeed v. Street*, 747 S.W.2d 526 (Tex. App. — Fort Worth 1988). These cases establish that “documents generated by the committee in order to conduct open and thorough review” are confidential. This protection extends “to documents that have been prepared by or at the direction of the committee for committee purposes.” *Jordan*, 701 S.W.2d at 647-48. Protection does not extend to documents “gratuitously submitted to a committee” or “created without committee impetus and purpose.” *Id.* at 648; *see also* Open Records Decision No. 591 (1991) (construing statutory predecessor to Health & Safety Code § 161.032). We note that section 161.032 does not make confidential “records made or maintained in the regular course of business by a hospital[.]” § 161.032(f); *see Memorial Hosp.—the Woodlands*, 927 S.W.2d at 10 (stating that reference to statutory predecessor to section 160.007 in section 161.032 is clear signal that records should be accorded same treatment under both statutes in determining if they were made in ordinary course of business).

You contend that the submitted documents responsive to item 3 of the request are confidential records of the university’s Conflict of Interest and Commitment Committee (the “committee”). You explain that the committee “reviews the disclosures submitted by faculty and staff to manage individual and institutional conflicts of interest as they arise in the areas of clinical care, research, and education.” You further state that the committee was established in compliance with the university’s Conflict of Interest Policies, which require doctors to make disclosures of potential conflicts of interest directly to the committee. You state that these policies require doctors to disclose potential conflicts of interest to the committee and therefore the committee is the only group for which the information is intended. You state that “[t]hese disclosures permit the committee to monitor outside relationships between doctors and industry in order to maintain the integrity of research conducted at the [u]niversity as well as issues regarding medical quality assurance and ethical conduct of medical care and research.” After reviewing your arguments, we agree that the committee is a “medical committee” as defined by section 161.031. Furthermore, after review of the information at issue, we find that it consists of records of a medical committee. Therefore, the university must withhold the submitted information responsive to item 3 pursuant to section 552.101 of the Government Code in conjunction with section 161.032(a).

You assert that the information you have marked in Tab 9 is private. Section 552.101 also encompasses the doctrines of common-law and constitutional privacy. Common-law privacy protects information if (1) the information contains highly intimate or embarrassing facts, the publication of which would be highly objectionable to a reasonable person, and (2) the information is not of legitimate concern to the public. *Indus. Found. v. Tex. Indus. Accident Bd.*, 540 S.W.2d 668, 685 (Tex. 1976). To demonstrate the applicability of common-law privacy, both prongs of this test must be satisfied. *Id.* at 681-82. The type of information considered intimate and embarrassing by the Texas Supreme Court in *Industrial Foundation* included information relating to sexual assault, pregnancy, mental or physical abuse in the workplace, illegitimate children, psychiatric treatment of mental disorders, attempted suicide, and injuries to sexual organs. *Id.* at 683. Further, this office has found that some kinds of medical information or information indicating disabilities or specific illnesses is protected by common-law privacy. *See* Open Records Decision Nos. 470 (1987) (illness from severe emotional and job-related stress), 455 (1987) (prescription drugs, illnesses, operations, and physical handicaps). After review of the submitted information and consideration of your arguments, we find that the university has not demonstrated that the information you have marked in Tab 9 constitutes highly intimate or embarrassing information for the purposes of common-law privacy. Therefore, the university may not withhold the information you have marked in Tab 9 under section 552.101 on that basis.

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)). After review of the submitted information and consideration of the arguments, we find that the university has failed to demonstrate how any portion of the information at issue is protected by constitutional privacy. Therefore, the university may not withhold any of the information at issue under section 552.101 on that basis. As you raise no other exception to the disclosure of the information in Tab 9, the university must release it to the requestor.

Section 552.107(1) of the Government Code protects information that comes within the attorney-client privilege. 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. *See* 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. *See* 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. *See 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. *See* 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. Lastly, 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. *See 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 information submitted in Tab 5 consists of e-mail communications between university employees and university attorneys made for the purpose of facilitating the rendition of professional legal services to the university. You have identified the parties to the communications. You also state that the communications were intended to be and remain confidential. Based on your representations and our review of the information at issue, we conclude that the university may withhold the submitted information in Tab 5 under section 552.107(1) of the Government Code.

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 the governmental body. *See* Open Records Decision No. 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* Open Records Decision No. 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).

This office also has concluded that a preliminary draft of a document that is intended for public release in its final form necessarily represents the drafter's advice, opinion, and recommendation with regard to the form and content of the final document, so as to be excepted from disclosure under section 552.111. *See* Open Records Decision No. 559 at 2 (1990) (applying statutory predecessor). Section 552.111 protects factual information in the draft that also will be included in the final version of the document. *See id.* at 2-3. Thus, section 552.111 encompasses the entire contents, including comments, underlining, deletions, and proofreading marks, of a preliminary draft of a policymaking document that will be released to the public in its final form. *See id.* at 2.

You seek to withhold the information at Tab 6 under section 552.111. You indicate that the submitted information in Tab 6 consists of communications between university administrators pertaining to proposed changes in the university's Institutional Handbook of Operating Procedures, as well as drafts of the various changes. You state that final versions of these policies are posted on the university website. You further state that the documents submitted in Tab 6 reflect the "advice and recommendations gleaned from internal discussions and exchanges within the [university] administration" and "address the issue of how these policies currently affect the University and how changes would impact its future." Based on your representations and our review of the information at issue, we conclude that you have demonstrated the applicability of section 552.111 of the Government Code to portions of the information submitted in Tab 6. We have marked the information in Tab 6 that you may withhold under section 552.111. However, we conclude that you have failed to demonstrate that the remaining information in Tab 6 consists of advice, recommendations, and opinions in the university's policymaking process and the university may not withhold the remaining submitted information under section 552.111 of the Government Code. As you raise no other exception to the disclosure of the remaining information, the university must release it to the requestor.

You assert that the information you have marked in Tab 7 consists of the identities and information that would tend to identify, donors to the university. Section 552.1235 of the Government Code excepts from public disclosure "the name or other information that would tend to disclose the identity of a person, other than a governmental body, who makes a gift, grant, or donation of money or property to an institution of higher education[.]" Gov't Code § 552.1235(a). However, this section does not except from disclosure the amount or value of an individual gift, grant, or donation. *See id.* § 552.1235(b). "Institution of higher education" is defined by section 61.003 of the Education Code. *Id.* § 552.1235(c). Section 61.003 defines an "institution of higher education" as any public technical institute, public junior college, public senior college or university, medical or dental unit, public state college, or other agency of higher education as defined in this section. *See Educ. Code* § 61.003. Because section 552.1235 does not provide a definition of "person," we look to the definition provided in the Code Construction Act. *See Gov't Code* § 311.005. "Person" includes a corporation, organization, government or governmental subdivision or agency, business trust, estate, trust, partnership, association, and any other legal entity. *Id.* § 311.005(2). In this instance, the information at issue lists the names of several donors to the university, as well as the address and telephone number of one of the donors. Upon review of Tab 7, we conclude that you may withhold portions of the information you have marked and the information we have marked pursuant to section 552.1235 of the Government Code. However, section 552.1235 is not applicable to a donor that is a governmental body. *See id.* 552.1235(a) Consequently, the university may not withhold the information that identifies governmental bodies as donors. We have marked this information for release.

Next, you state that certain documents responsive to request item number five consist of audit working papers subject to section 552.116. You included a representative sample of this information at Tab 8. 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, 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 the requirements of Section 552.021. If information in an audit working paper is also maintained in another record, that other record is not excepted from the requirements of Section 552.021 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.

Government Code § 552.116. You state that chapter 2102 of the Government Code authorizes the university to conduct audits. You further state that section 2102.003(2) of the Government Code references section 321.032, 321.033, 321.0334 and 321.0136 of the Government Code, statutes which describe authorized audits such as the one in question. You inform us that section 1.6 of series 10402 of the University of Texas System Board of Regents' Rules and Regulations describes the duties of the Board's Audit, Compliance, and Management Review Committee. You state that the submitted documents pertain to an audit conducted by the Board in compliance with the provisions outlined in the Regents' Rules, which "are promulgated in the exercise of the authority delegated by the Legislature and are of the same force as statutes." You explain that the submitted documents consist of audit working papers of an audit that has yet to result in a final audit. Based on your arguments and our review, we agree that portions of the information at issue constitute audit working papers, and thus may be withheld under section 552.116 of the Government Code. However, we have marked two documents in Tab 8 that we find are not audit working papers for purposes of section 552.116(b)(2). Thus, the university may not withhold these two documents based on section 552.116.

Next, we note that section 552.117 may apply to a portion of the information submitted in Tab 6 of your July 7, 2008, submission. Section 552.117 of the Government Code excepts from public disclosure the present and former home addresses and telephone numbers, social security numbers, and family member information of current or former officials or employees of a governmental body who request that this information be kept confidential under section 552.024. *See id.* § 552.117(a)(1). Whether a particular piece of information is protected by section 552.117(a)(1) must be determined at the time the request for it is made. *See Open Records Decision No. 530 at 5 (1989)*. We note that section 552.117 also encompasses a personal cellular telephone number, provided that the cellular phone service is not paid for by a governmental body. *See Open Records Decision No. 506 at 5-6 (1988)* (section 552.117 not applicable to cellular mobile phone numbers paid for by governmental body and intended for official use). Thus, to the extent that the submitted phone number we have marked in Tab 6 belongs to a university employee who has made a timely election under section 552.024, this number must be withheld under section 552.117. To the extent

the submitted number does not belong to a university employee who made a timely election, it may not be withheld under section 552.117(a)(1) and the submitted information must be released to the requestor.

Finally, we note that the first document at issue in Tab 8 of your July 7, 2008, submission includes an e-mail address obtained from a member of the public. Section 552.137 makes certain e-mail addresses confidential. Section 552.137 provides:

(a) Except as otherwise provided by this section, 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 this chapter.

(b) Confidential information described by this section that relates to a member of the public may be disclosed if the member of the public affirmatively consents to its release.

(c) Subsection (a) does not apply to an e-mail address:

(1) provided to a governmental body by a person who has a contractual relationship with the governmental body or by the contractor's agent;

(2) provided to a governmental body by a vendor who seeks to contract with the governmental body or by the vendor's agent;

(3) contained in a response to a request for bids or proposals, contained in a response to similar invitations soliciting offers or information relating to a potential contract, or provided to a governmental body in the course of negotiating the terms of a contract or potential contract; or

(4) provided to a governmental body on a letterhead, coversheet, printed document, or other document made available to the public.

(d) Subsection (a) does not prevent a governmental body from disclosing an e-mail address for any reason to another governmental body or to a federal agency.

Gov't Code § 552.137. Under section 552.137, a governmental body must withhold the e-mail address of a member of the general public, unless the individual to whom the e-mail address belongs has affirmatively consented to its public disclosure. *See id.* § 552.137(b). You do not inform us that a member of the public has affirmatively consented to the release

of any e-mail address contained in the submitted materials. The university must, therefore, withhold the e-mail address in Tab 8 under section 552.137.

In summary: (1) the e-mails submitted in Tab 10 are not subject to the Act and need not be disclosed to the requestor; (2) the university must withhold the submitted information responsive to requested item number three pursuant to section 552.101 of the Government Code in conjunction with section 161.031 of the Health and Safety Code; (3) the university may withhold the submitted information in Tab 5 under section 552.107(1) of the Government Code; (4) the university may withhold the information we have marked in Tab 6 under section 552.111 of the Government Code; (5) the university may withhold portions of the information you have marked and the information we have marked in Tab 7 pursuant to section 552.1235 of the Government Code; (6) the university may withhold portions of the submitted information in Tab 8 under section 552.116 of the Government Code; (7) to the extent that the submitted phone number we have marked in Tab 6 belongs to a university employee who has made a timely election under section 552.024, this number must be withheld under section 552.117(a)(1) of the Government Code; and (8) the university must withhold the marked e-mail address in Tab 8. The remaining submitted information must be released to the requestor.

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).

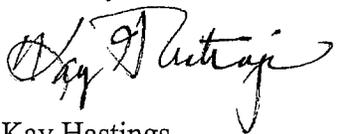
If this ruling requires the governmental body to release all or part of the requested information, the governmental body is responsible for taking the next step. Based on the statute, the attorney general expects that, upon receiving this ruling, the governmental body will either release the public records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



Kay Hastings  
Assistant Attorney General  
Open Records Division

KH/jh

Ref: ID# 320011

Enc. Submitted documents

c: Mr. Wayne Dolcefino  
3310 Bissonnet  
Houston, Texas 77005  
(w/o enclosures)

Mr. Townsend Davis  
ABC, Inc.  
77 West 66<sup>th</sup> Street  
New York, New York 10023-6298  
(w/o enclosures)