



ATTORNEY GENERAL OF TEXAS
GREG ABBOTT

September 24, 2014

Ms. Cara Leahy White
For the City of Alvarado
Taylor, Olson, Adkins, Sralla & Elam, L.L.P.
6000 Western Place, Suite 200
Fort Worth, Texas 76107

OR2014-17018

Dear Ms. White:

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# 537258.

The City of Alvarado (the "city"), which you represent, received (1) a request for a named city police officer's personnel file and the officer's activity reports, incident reports, and offense reports for a specified time period; and (2) a second request from the same requestor for the personnel files of the city secretary and city clerk. We understand the city will withhold the insurance policy numbers you have marked under section 552.136(c) of the Government Code and the social security numbers you have marked under section 552.147(b) of the Government Code.¹ You state you will withhold certain

¹Section 552.136(c) of the Government Code authorizes a governmental body to redact, without the necessity of requesting a decision from this office, the information described in section 552.136(b). Gov't Code § 552.136(c); *see also id.* § 552.136(d)-(e) (requestor may appeal governmental body's decision to withhold information under section 552.136(c) to attorney general and governmental body withholding information pursuant to section 552.136(c) must provide certain notice to requestor). Section 552.147(b) of the Government Code 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. *Id.* § 552.147(b).

information pursuant to Open Records Decision No. 684 (2009).² You claim the submitted information is excepted from disclosure under sections 552.101, 552.102, 552.117, 552.119, 552.130, and 552.137 of the Government Code.³ We have considered the exceptions you claim and reviewed the submitted information.

Initially, we note you have not submitted the requested activity reports, incident reports, and offense reports of the named police officer. Thus, to the extent such information existed and was maintained by the city on the date the city received the request for information, we presume the city has released it. If not, the city must do so at this time. *See Gov't Code* §§ 552.301, .302; *see also* Open Records Decision No. 664 (2000) (if governmental body concludes that no exceptions apply to the requested information, it must release the information as soon as possible).

Next, we note the submitted information contains a peace officer's Texas Commission on Law Enforcement ("TCOLE") identification number. In Open Records Decision No. 581 (1990), this office determined certain computer information, such as source codes, documentation information, and other computer programming, that has no significance other than its use as a tool for the maintenance, manipulation, or protection of public property is not the kind of information made public under section 552.021 of the Government Code. We understand an officer's TCOLE identification number is a unique computer-generated number assigned to peace officers for identification in the commissioner's electronic database and may be used as an access device number on the TCOLE website. Accordingly, we find the officer's TCOLE identification number in the submitted information does not

²Open Records Decision No. 684 is a previous determination to all governmental bodies authorizing them to withhold specific categories of information without the necessity of requesting an attorney general decision, including: direct deposit authorization forms under section 552.101 of the Government Code in conjunction with common-law privacy; a Form I-9 and attachments under section 552.101 of the Government Code in conjunction with section 1324a of title 8 of the United States Code; W-2 and W-4 forms under section 552.101 of the Government Code in conjunction with section 6103(a) of title 26 of the United States Code; and L-2 and L-3 declarations under section 552.101 of the Government Code in conjunction with section 1701.306 of the Occupations Code.

³You acknowledge, and we agree, the city failed to comply with the procedural requirements of section 552.301 of the Government Code in requesting a decision from this office on the public availability of the submitted information. *See Gov't Code* § 552.301(b) (requiring governmental body to ask for ruling and state exceptions that apply within ten business days of receiving written request), (e) (requiring governmental body to submit within fifteen business days of receiving request for information comments explaining applicability of raised exceptions, copy of request for information, signed statement of date governmental body received request or evidence sufficient to establish date, and copy of information governmental body seeks to withhold or representative samples). Nonetheless, sections 552.101, 552.102, 552.117, 552.119, 552.130, and 552.137 are mandatory exceptions that can provide compelling reasons to overcome the presumption of openness caused by failure to comply with section 552.301. *See id.* §§ 552.007, .302. Thus, we will consider the applicability of these exceptions to the submitted information, notwithstanding the city's violation of section 552.301 in requesting this decision.

constitute public information under section 552.002 of the Government Code. Therefore, the TCOLE identification number is not subject to the Act and need not be released to the requestor.⁴

Next, you explain and we agree the information you submit as responsive to the second request is subject to Open Records Letter No. 2014-10600 (2014). In that ruling, in pertinent part, we determined, because the city did not submit the personnel files of the city secretary and city clerk for our review, the city must release such information to the extent it existed and was maintained by the city on the date the city received the request for information. Section 552.007 of the Government Code provides, if a governmental body voluntarily releases information to any member of the public, the governmental body may not withhold such information from further disclosure, unless its public release is expressly prohibited by law or the information is confidential by law. *See Gov't Code 552.007*; Open Records Decision No. 518 at 3 (1989); *see also* Open Records Decision No. 400 (1983) (governmental body may waive right to claim permissive exceptions to disclosure under the Act, but may not disclose information made confidential by law). Accordingly, the city may not now withhold information previously ordered release unless its release is expressly prohibited by law or the information is confidential by law. The city now raises sections 552.101, 552.102, 552.117, and 552.137 of the Government Code for this information. As section 552.101 protects information made confidential under law and sections 552.102, 552.117, and 552.137 make information confidential under the Act, we will address the applicability of these exceptions to the information that was previously ordered 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, such as laws that make criminal history record information (“CHRI”) confidential. CHRI generated by the National Crime Information Center (the “NCIC”) or by the Texas Crime Information Center is confidential under federal and state law. CHRI means “information collected about a person by a criminal justice agency that consists of identifiable descriptions and notations of arrests, detentions, indictments, informations, and other formal criminal charges and their dispositions.” *Id.* § 411.082(2). Title 28, part 20 of the Code of Federal Regulations governs the release of CHRI obtained from the NCIC network or other states. *See* 28 C.F.R. § 20.21. The federal regulations allow each state to follow its individual law with respect to CHRI it generates. Open Records Decision No. 565 at 7 (1990). *See generally* Gov’t Code §§ 411.081-.1409. Section 411.083 of the Government Code deems confidential CHRI the Texas Department of Public Safety (“DPS”) maintains, except DPS may disseminate this information as provided in chapter 411, subchapter F of the Government Code. *See id.*

⁴As we are able to make this determination, we need not address your arguments against the disclosure of this information.

§ 411.083. Sections 411.083(b)(1) and 411.089(a) authorize a criminal justice agency to obtain CHRI; however, a criminal justice agency may not release CHRI except to another criminal justice agency for a criminal justice purpose. *Id.* § 411.089(b)(1). Other entities specified in chapter 411 of the Government Code are entitled to obtain CHRI from DPS or another criminal justice agency; however, those entities may not release CHRI except as provided by chapter 411. *See generally id.* §§ 411.090-.127. Thus, any CHRI obtained from DPS or any other criminal justice agency must be withheld under section 552.101 of the Government Code in conjunction with Government Code chapter 411, subchapter F. However, we note that the term CHRI does not include driving record information. *See id.* § 411.082(2)(B). Accordingly, the city must withhold the CHRI we have marked under section 552.101 in conjunction with federal law and chapter 411 of the Government Code.⁵ Upon review, we find you have not demonstrated any of the remaining information constitutes confidential CHRI for the purposes of chapter 411. As such, the city may not withhold the remaining information under section 552.101 on this basis.

Section 552.101 of the Government Code also encompasses section 411.192 of the Government Code, which governs the release of information maintained by DPS concerning the licensure of an individual to carry a concealed handgun. Section 411.192 provides in part:

(a) [DPS] shall disclose to a criminal justice agency information contained in its files and records regarding whether a named individual or any individual named in a specified list is licensed under this subchapter. Information on an individual subject to disclosure under this section includes the individual's name, date of birth, gender, race, zip code, telephone number, e-mail address, and Internet website address. Except as otherwise provided by this section and by Section 411.193, all other records maintained under this subchapter are confidential and are not subject to mandatory disclosure under the open records law, Chapter 552.

(b) An applicant or license holder may be furnished a copy of disclosable records regarding the applicant or license holder on request and the payment of a reasonable fee.

Id. § 411.192(a)-(b). We have marked information that is subject to section 411.192. In this instance, the requestor is neither the license holder nor a criminal justice agency. Therefore, the city must withhold the information we marked under section 552.101 in conjunction with

⁵As our ruling is dispositive, we need not address your remaining arguments against the disclosure of this information.

section 411.192.⁶ However, we find you have failed to demonstrate any of the remaining information is subject to section 411.192. Thus, the city may not withhold any of the remaining information under section 552.101 on that basis.

Section 552.101 of the Government Code also encompasses the Medical Practice Act (the “MPA”), subtitle B of title 3 of the Occupations Code. The MPA provides, in pertinent part, the following:

(a) A communication between a physician and a patient, relative to or in connection with any professional services as a physician to the patient, is confidential and privileged and may not be disclosed except as provided by this chapter.

(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(a)-(c). Information that is subject to the MPA includes both medical records and information obtained from those medical records. *See id.* §§ 159.002, .004. Upon review, we find the information we have marked constitutes medical records. As such, the city must withhold the marked medical records under section 552.101 in conjunction with the MPA.⁷

Section 552.101 of the Government Code also encompasses section 1701.454 of the Occupations Code. Section 1701.545 governs the public availability of information submitted to TCOLE under subchapter J of chapter 1701 of the Occupations Code. Section 1701.454 provides as follows:

(a) All information submitted to the [TCOLE] under this subchapter is confidential and is not subject to disclosure under Chapter 552, Government Code, unless the person resigned or was terminated due to substantiated

⁶As our ruling is dispositive, we need not address your remaining arguments against disclosure of this information.

⁷As our ruling is dispositive, we need not address your remaining argument against the disclosure of this information.

incidents of excessive force or violations of the law other than traffic offenses.

(b) Except as provided by this subchapter, a [TCOLE] member or other person may not release information submitted under this subchapter.

Id. § 1701.454. You seek to withhold an F-5 History Report under section 1701.454. Upon review, we find this information was not submitted to TCOLE under subchapter J of chapter 1701 of the Occupations Code. Accordingly, we conclude the city may not withhold the F-5 History Report under section 552.101 in conjunction with section 1701.454.

Section 552.101 of the Government Code also encompasses the doctrine of common-law privacy, which protects information that is (1) highly intimate or embarrassing, the publication of which would be highly objectionable to a reasonable person, and (2) 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. Types of information considered intimate and embarrassing by the Texas Supreme Court are delineated in *Industrial Foundation*. *Id.* at 683. This office has also concluded some kinds of medical information are generally highly intimate or embarrassing. *See* Open Records Decision No. 455 (1987). However, this office has noted the public has a legitimate interest in information that relates to public employees and their conduct in the workplace. *See, e.g.*, 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), 470 at 4 (1987) (job performance does not generally constitute public employee's private affairs), 444 at 3 (1986) (public has obvious interest in information concerning qualifications and performance of government employees).

Additionally, this office has found that personal financial information not relating to a financial transaction between an individual and a governmental body is generally intimate or embarrassing. *See generally* Open Records Decision Nos. 600 at 9-10 (1992) (employee's withholding allowance certificate, designation of retirement beneficiary, choice of insurance carrier, election of optional coverages, direct deposit authorization, forms allowing employee to allocate pretax compensation to group insurance, health care or dependent care), 545 (1990) (deferred compensation information, participation in voluntary investment program, election of optional insurance coverage, mortgage payments, assets, bills, and credit history), 523 (1989) (common-law privacy protects credit reports, financial statements, and other personal financial information), 373 (1983) (sources of income not related to financial transaction between individual and governmental body protected under common-law privacy). However, there is a legitimate public interest in the essential facts about a financial transaction between an individual and a governmental body. *See* ORDs 600 at 9 (information revealing employee participates in group insurance plan funded partly or wholly by governmental body is not excepted from disclosure), 545 (financial information pertaining to receipt of funds from governmental body or debts owed to governmental body not

protected by common-law privacy). Whether the public's interest in obtaining personal financial information is sufficient to justify its disclosure must be determined on a case-by-case basis. *See* ORD 373.

Upon review, we find some of the remaining information satisfies the standard articulated by the Texas Supreme Court in *Industrial Foundation*. Therefore, we conclude the city must withhold this information, which we have marked, under section 552.101 of the Government Code in conjunction with common-law privacy.⁸ However, we find you have failed to demonstrate the remaining information is highly intimate or embarrassing and not of legitimate public concern. Thus, the city may not withhold the remaining information under section 552.101 on this basis.

Section 552.102(a) of the Government Code exempts 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). You assert the privacy analysis under section 552.102(a) is the same as the common-law privacy test under section 552.101, which is discussed above. *See Indus. Found.*, 540 S.W.2d at 685. In *Hubert v. Harte-Hanks Texas Newspapers, Inc.*, 652 S.W.2d 546, 549-51 (Tex. App.—Austin 1983, writ ref'd n.r.e.), the court ruled the privacy test under section 552.102(a) is the same as the *Industrial Foundation* privacy test. However, the Texas Supreme Court has expressly disagreed with *Hubert's* interpretation of section 552.102(a) and held its privacy standard differs from the *Industrial Foundation* test under section 552.101. *Tex. Comptroller of Pub. Accounts v. Attorney Gen. of Tex.*, 354 S.W.3d 336 (Tex. 2010). The supreme court then considered the applicability of section 552.102, and has held section 552.102(a) exempts from disclosure the dates of birth of state employees in the payroll database of the Texas Comptroller of Public Accounts. *Id.* at 347. Thus, *Texas Comptroller* applies to only a public employee's birth date maintained by the employer in an employment context. In this instance, some of the information you have marked is either not held by the city in an employment context or it is not information that is excepted under section 552.102(a). Therefore, with the exception of the information we have marked for release, the city must withhold the dates of birth you have marked, and the additional information we have marked for withholding, under section 552.102(a).

You state the city will withhold the personal information of the city's police officer you have marked under section 552.117(a)(2) of the Government Code pursuant to Open Records Decision No. 670 (2001).⁹ However, we note some of the information you have marked is not information that is subject to section 552.117(a)(2). Additionally, we note the remaining information includes additional information that pertains to the city's police officer that is

⁸As our ruling is dispositive, we need not address your remaining arguments against the disclosure of this information.

⁹Open Records Decision No. 670 is a previous determination authorizing all governmental bodies to withhold the current and former home addresses and telephone numbers, personal cellular telephone numbers, social security numbers, and family member information of peace officers under section 552.117(a)(2) of the Government Code without the necessity of requesting an attorney general decision.

subject to section 552.117(a)(2). As such, we will address the applicability of section 552.117(a)(2). Section 552.117(a)(2) applies to records a governmental body holds in an employment capacity and excepts from public disclosure the current and former home addresses and telephone numbers, emergency contact information, social security number, and family member information of a peace officer, regardless of whether the peace officer made an election under section 552.024 or section 552.1175 of the Government Code to keep such information confidential. Gov't Code § 552.117(a)(2). Section 552.117(a)(2) applies to peace officers as defined by article 2.12 of the Code of Criminal Procedure. Section 552.117(a)(2) protects a peace officer's personal cellular telephone number if the cellular telephone service is not paid for by a governmental body. Open Records Decision No. 670 at 6 (2001); *cf.* Open Records Decision No. 506 at 5-6 (1988) (statutory predecessor to section 552.117 of the Government Code not applicable to numbers for cellular mobile phones installed in county officials' and employees' private vehicles and intended for official business). We note an individual's personal post office box number is not a "home address" for purposes of section 552.117. *See* Open Records Decision No. 622 at 6 (1994) (legislative history makes clear that purpose of section 552.117 is to "protect public employees from being harassed *at home*" (emphasis added) (citing House Committee on State Affairs, Bill Analysis, H.B. 1979, 69th Leg. (1985))).

You have marked personal information pertaining to individuals who are not employed by the city. Thus, this information is not held by the city in an employment capacity and may not be withheld under section 552.117(a)(2). You state the city's police officer whose information is at issue is a currently licensed peace officer. Some of the information you have marked that belongs to the city's police officer does not constitute the officer's home address, home telephone number, emergency contact information, social security number, or family member information. Accordingly, we conclude, with the exception of the information pertaining to the city's police officer we have marked for release that is not subject to section 552.117(a)(2), the city must withhold the information you have marked that pertains to the city's police officer, and the additional information we have marked for withholding, under section 552.117(a)(2). However, the city may not withhold the cellular telephone number at issue on that basis if the cellular telephone service is paid for by a governmental body.

Section 552.117(a)(1) of the Government Code applies to records a governmental body holds in an employment capacity and excepts from disclosure the home addresses and telephone numbers, emergency contact information, 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 of the Government Code. Gov't Code § 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). Therefore, a governmental body must withhold information under section 552.117 on behalf of a current or former official or employee only if the individual made a request for confidentiality under section 552.024 prior to the date on which the request for this information was made.

You have marked information pertaining to individuals who are not current or former city employees; thus, this information is not held by the city in an employment context and it may not be withheld under section 552.117(a)(1). As to the city employees whose information is at issue, you have submitted election forms in which the employees timely requested confidentiality of their home addresses and home telephone numbers. However, the forms do not allow the individuals to elect to keep their emergency contact information or family member information confidential; thus, those types of information may not be withheld under section 552.117(a)(1). Accordingly, the city must withhold the city employees' home addresses and home telephone numbers, which we have marked, under section 552.117(a)(1). The city may not withhold any of the remaining information you have marked on this basis.

We note section 552.1175 of the Government Code may be applicable to the information you have marked for one the individuals who is not employed by the city, as well as to another individual whose information is at issue.¹⁰ Section 552.1175 applies to information pertaining to individuals that the city does not hold in an employment capacity and provides, in part:

(a) This section applies only to:

...

(3) current or former employees of the Texas Department of Criminal Justice [("TDJC")] . . . ; [and]

...

(10) federal judges and state judges as defined by Section 13.0021, Election Code[.]

...

(b) Information that relates to the home address, home telephone number, emergency contact information, date of birth, or social security number of an individual to whom this section applies, or that reveals whether the individual has family members is confidential and may not be disclosed to the public under this chapter if the individual to whom the information relates:

(1) chooses to restrict public access to the information; and

¹⁰The Office of the Attorney General will raise a mandatory exception on behalf of a governmental body, but ordinarily will not raise other exceptions. See Open Records Decision Nos. 481 (1987), 480 (1987), 470 (1987).

(2) notifies the governmental body of the individual's choice on a form provided by the governmental body, accompanied by evidence of the individual's status.

Gov't Code § 552.1175(a)(3), (10), (b). Upon review, we conclude, to the extent the information we have marked pertains to individuals who are subject to section 552.1175(a) and the individuals at issue elect to restrict access to their information in accordance with section 552.1175(b), the city must withhold the information we have marked under section 552.1175. However, to the extent the individuals whose information we have marked are not subject to section 552.1175(a) or no election is made, the city may not withhold this information under section 552.1175.

You state the city will withhold certain information you have marked under section 552.130(a)(1) of the Government Code pursuant to section 552.130(c) of the Government Code.¹¹ Section 552.130 provides information relating to a motor vehicle operator's or driver's license or permit, a motor vehicle title or registration, or a personal identification document issued by an agency of Texas or another state or country is excepted from public release. *Id.* § 552.130(a). Upon review, we find some of the information you have marked is not information that is subject to section 552.130; thus, the city may not withhold this information, which we have marked for release, on this basis. We conclude, with the exception of the information we have marked for release, the city must withhold the information you have marked, and the additional information we have marked for withholding, under section 552.130.

You state the city will withhold the e-mail addresses you have marked under section 552.137 of the Government Code pursuant to Open Records Decision No. 684.¹² Section 552.137 excepts from disclosure "an e-mail address of a member of the public that is provided for the purpose of communicating electronically with a governmental body," unless the member of the public consents to its release or the e-mail address is of a type specifically excluded by subsection (c). *Id.* § 552.137(a)-(c). Section 552.137 is not applicable to an institutional e-mail address, an Internet website address, the general e-mail address of a business, an e-mail address of a person who has a contractual relationship with a governmental body, or an e-mail address maintained by a governmental entity for one of its officials or employees. Some of the e-mail addresses you have marked are e-mail addresses that are subject to section 552.137(c). Thus, the city may not withhold these e-mail addresses under section 552.137. The remaining e-mail addresses you have marked are not one of the types

¹¹Section 552.130(c) of the Government Code allows a governmental body to redact the information described in section 552.130(a) without the necessity of seeking a decision from the attorney general. Gov't Code § 552.130(c). If a governmental body redacts such information, it must notify the requestor in accordance with section 552.130(e). *See id.* § 552.130(d), (e).

¹²Open Records Decision No. 684 is a previous determination to all governmental bodies authorizing them to withhold certain categories of information, including an e-mail address of a member of the public under section 552.137 of the Government Code, without the necessity of requesting an attorney general decision.

specifically excluded by section 552.137(c). Accordingly, with the exception of the e-mail addresses we have marked for release, the city must withhold the e-mail addresses you have marked under section 552.137 unless the owners of the addresses affirmatively consent to their release.

In summary, the submitted TCOLE identification number is not subject to the Act and need not be released to the requestor. The city must withhold the CHRI we have marked under section 552.101 of the Government Code in conjunction with federal law and chapter 411 of the Government Code. The city must withhold the information we marked under section 552.101 of the Government Code in conjunction with section 411.192 of the Government Code. The city must withhold the marked medical records under section 552.101 of the Government Code in conjunction with the MPA. The city must withhold the information we have marked under section 552.101 of the Government Code in conjunction with common-law privacy. With the exception of the information we have marked for release, the city must withhold the dates of birth of you have marked, and the additional information we have marked for withholding, under section 552.102(a) of the Government Code. With the exception of the information pertaining to the city's police officer we have marked for release, the city must withhold the information you have marked that pertains to the city's police officer, and the additional information we have marked for withholding, under section 552.117(a)(2) of the Government Code; however, the city may not withhold the cellular telephone number at issue if the service is paid for by a governmental body. The city must withhold the city employees' home addresses and home telephone numbers we have marked under section 552.117(a)(1) of the Government Code. To the extent the information at issue pertains to individuals who are subject to section 552.1175(a) of the Government Code and the individuals at issue elect to restrict access to their information in accordance with section 552.1175(b) of the Government Code, the city must withhold the information we have marked under section 552.1175 of the Government Code. With the exception of the information we have marked for release, the city must withhold the information you have marked, and the additional information we have marked for withholding, under section 552.130 of the Government Code. With the exception of the e-mail addresses we have marked for release, the city must withhold the e-mail addresses you have marked under section 552.137 of the Government Code, unless the owners of the addresses affirmatively consent to their release. The city must release the remaining information that is subject to the Act.

This letter ruling is limited to the particular information 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 information or any other circumstances.

This ruling triggers important deadlines regarding the rights and responsibilities of the governmental body and of the requestor. For more information concerning those rights and responsibilities, please visit our website at http://www.texasattorneygeneral.gov/open_orl_ruling_info.shtml, or call the Office of the Attorney General's Open Government Hotline, toll free, at (877) 673-6839. Questions concerning the allowable charges for

providing public information under the Act may be directed to the Office of the Attorney General, toll free, at (888) 672-6787.

Sincerely,

A handwritten signature in black ink that reads "Lindsay E. Hale". The signature is written in a cursive style with a large initial "L" and a distinct "E" and "H".

Lindsay E. Hale
Assistant Attorney General
Open Records Division

LEH/akg

Ref: ID# 537258

Enc. Submitted documents

c: Requestor
(w/o enclosures)