



ATTORNEY GENERAL OF TEXAS  
GREG ABBOTT

September 29, 2014

Mr. Bobby Kacz  
Office of the City Attorney  
City of Alvin  
216 West Sealy Street  
Alvin, Texas 77511

OR2014-17317

Dear Mr. Kacz:

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# 537584.

The Alvin Police Department (the "department") received a request for information pertaining to a specified case. You state the department released some information to the requestor. You indicate the department will withhold personal e-mail addresses under section 552.137 of the Government Code in accordance with Open Records Decision No. 684 (2009).<sup>1</sup> You claim the submitted information is excepted from disclosure under sections 552.101, 552.130, 552.136, and 552.147 of the Government Code.<sup>2</sup> We have considered the exceptions you claim and reviewed the submitted information. We have also received and considered comments submitted by the requestor. *See Gov't Code* § 552.304 (providing that interested party may submit written comments regarding why information should or should not be released).

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<sup>1</sup>Open Records Decision No. 684 serves as a previous determination to all governmental bodies authorizing them to withhold certain categories of information, including personal e-mail addresses under section 552.137 of the Government Code, without the necessity of requesting an attorney general decision.

<sup>2</sup>Although you do not raise section 552.130, 552.136, or 552.147 of the Government Code in your brief, we understand you to raise these exceptions based on your markings in the submitted information.

Initially, we note, and you acknowledge, you have not submitted a responsive cassette tape recording for our review. Pursuant to section 552.301(e) of the Government Code, within fifteen business days of receipt of the request, a governmental body must submit to this office (1) written comments stating the reasons why the stated exceptions apply that would allow the information to be withheld, (2) a copy of the written request for information, (3) a signed statement or sufficient evidence showing the date the governmental body received the written request, and (4) a copy of the specific information requested or representative samples, labeled to indicate which exceptions apply to which parts of the documents. *Id.* § 552.301(e). You state the department received the request on July 7, 2014. As of the date of this letter, you have not submitted to this office a copy or representative sample of the recording at issue. Although you explain the department has no way to copy or duplicate the recording at issue, we note the fifteen-business-day deadline to submit a copy of the information requested is statutorily imposed on the department by section 552.301(e), and this office is required to adhere to this provision when determining the timeliness of the submissions made by the department for purposes of requesting a ruling under the Act. *See id.* §§ 552.301, .302, .306. Additionally, we note a governmental body may not decline to comply with the requirements of the Act on the ground of administrative inconvenience. *See Indus. Found. v. Tex. Indus. Accident Bd.*, 540 S.W.2d 668, 687 (Tex. 1976). Therefore, we conclude the department has failed to comply with procedural requirements of section 552.301(e) with respect to the recording at issue.

Pursuant to section 552.302 of the Government Code, a governmental body's failure to comply with the requirements of section 552.301 results in the legal presumption the requested information is public and must be released unless a compelling reason exists to withhold the information from disclosure. *See Gov't Code* § 552.302; *Simmons v. Kuzmich*, 166 S.W.3d 342, 350 (Tex. App.—Fort Worth 2005, no pet.); *Hancock v. State Bd. of Ins.*, 797 S.W.2d 379, 381-82 (Tex. App.—Austin 1990, no writ) (governmental body must make compelling demonstration to overcome presumption of openness pursuant to statutory predecessor to section 552.302); *see also* Open Records Decision No. 630 (1994). Generally, a compelling reason to withhold information exists where some other source of law makes the information confidential or where third party interests are at stake. Open Records Decision No. 150 at 2 (1977). You seek to withhold the recording at issue under section 552.101 of the Government Code in conjunction with the common-law informer's privilege. The purpose of the common-law informer's privilege is to protect the flow of information to a governmental body, rather than to protect a third person. Thus, unlike other claims under section 552.101, a governmental body may waive the informer's privilege. *See* Open Records Decision No. 549 at 6 (1990). Therefore, the department's assertion of the informer's privilege does not provide a compelling reason for non-disclosure under section 552.302, and the department may not withhold any portion of the recording under section 552.101 of the Government Code on that basis. Furthermore, because you have not submitted the recording to this office for our review, we have no basis for finding it excepted from disclosure or confidential by law. Thus, we have no choice but to order the release of the recording at issue pursuant to section 552.302.

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. Section 552.101 encompasses laws that make criminal history record information (“CHRI”) confidential. CHRI generated by the National Crime Information Center (“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). 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* Gov’t Code § 411.083. Section 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). 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. We note section 411.083 does not apply to active warrant information or other information relating to one’s current involvement with the criminal justice system. *See id.* § 411.081(b) (police department allowed to disclose information pertaining to person’s current involvement in the criminal justice system). We also note the term CHRI does not include driving record information. *See id.* § 411.082(2)(B).

Upon review, we find the information we have marked consists of confidential CHRI the department must withhold under section 552.101 in conjunction with federal law and chapter 411 of the Government Code.<sup>3</sup> However, we find you have failed to demonstrate how any of the remaining information at issue consists of confidential CHRI. Therefore, the department may not withhold the remaining information in Exhibit 2 under section 552.101 on this basis.

Section 552.101 of the Government Code also encompasses section 411.153 of the Government Code. Section 411.153 provides as follows:

- (a) A DNA record stored in the DNA database is confidential and is not subject to disclosure under [the Act].

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<sup>3</sup>As our ruling is dispositive, we need not address your remaining arguments against disclosure of this information.

(b) A person commits an offense if the person knowingly discloses to an unauthorized recipient information in a DNA record or information related to a DNA analysis of a sample collected under this subchapter.

(c) An offense under this section is a state jail felony.

(d) A violation under this section constitutes official misconduct.

*Id.* § 411.153. A “DNA record” means the results of a forensic DNA analysis performed by a DNA laboratory. *See id.* § 411.141(6)-(7). “Forensic analysis” is defined as “a medical, chemical, toxicologic, ballistic, or other expert examination or test performed on physical evidence, including DNA evidence, for the purpose of determining the connection of the evidence to a criminal action.” *See* Crim. Proc. Code art. 38.35(4); *see also* Gov’t Code § 411.141(10) (providing that “forensic analysis” has meaning assigned by article 38.35). A “DNA database” means “one or more databases that contain forensic DNA records maintained by the director of [DPS].” Gov’t Code § 411.141(5); *see id.* § 411.001(3).

The director of DPS is required to establish certain procedures for DNA laboratories. *See id.* §§ 411.142(h) (requiring director establish standards for DNA analysis), .144(a). Section 411.144 of the Government Code provides that a DNA laboratory conducting a forensic DNA analysis under subchapter G of chapter 411 shall comply with subchapter G and the rules adopted under subchapter G. *See id.* § 411.144(d); 37 T.A.C. §§ 28.81, .82 (describing minimum standards by which forensic DNA laboratory must abide); *see also* Gov’t Code § 411.147(b). The director of DPS may release a DNA record in certain instances, including to a criminal justice agency for criminal justice or law enforcement purposes. *See* Gov’t Code § 411.147(c).

Upon review, we find a portion of Exhibit 7 consists of records relating to DNA analyses of samples that appear to have been collected under subchapter G of chapter 411 of the Government Code. We note this information is contained in records of a criminal investigation and appears to be the result of forensic DNA analyses performed by a DNA laboratory in accordance with DPS regulations. Therefore, the department must withhold the information we have marked under section 552.101 of the Government Code in conjunction with section 411.153 of the Government Code. However, we find you have failed to demonstrate how any of the remaining information in Exhibit 7 consists of records relating to DNA analyses for purposes of chapter 411. Accordingly, the department may not withhold the remaining information at issue under section 552.101 of the Government Code on the basis of section 411.153 of the Government Code.

Section 552.101 of the Government Code also encompasses section 418.182 of the Government Code, which was added to chapter 418 of the Government Code as part of the Texas Homeland Security Act (“HSA”). Section 418.182 provides, in part, the following:

(a) Except as provided by Subsections (b) and (c), information, including access codes and passwords, in the possession of a governmental entity that relates to the specifications, operating procedures, or location of a security system used to protect public or private property from an act of terrorism or related criminal activity is confidential.

*Id.* § 418.182(a). The fact that information may relate to a security system does not make the information *per se* confidential under section 418.182. *See* Open Records Decision No. 649 at 3 (1996) (language of confidentiality provision controls scope of its protection). As with any exception to disclosure, a governmental body asserting one of the confidentiality provisions of the HSA must adequately explain how the responsive records fall within the scope of the claimed provision. *See* Gov't Code § 552.301(e)(1)(A) (governmental body must explain how claimed exception to disclosure applies).

You state the photographs and video recordings submitted as Exhibit 4 disclose the location of security cameras in the city jail and area bowling alley, as well as the location of security cameras in a local convenience store. We understand the security camera in the city jail video recording is part of a security system used to protect private and public property from acts of terrorism or related criminal activity. Upon review, we find the video recording pertaining to the city jail in Exhibit 4 relates to the specifications and locations of a security system used to protect private and public property from an act of terrorism or related criminal activity. *See Tex. Dep't of Pub. Safety v. Abbott*, 310 S.W.3d 670 (Tex. App.—Austin 2010, no pet.) (finding confidential under section 418.182 of HSA video recording containing images recorded by security cameras in Texas Capitol hallway because specifications of security system included cameras' capabilities and video recording demonstrated those capabilities through characteristics, quality, and clarity of images recorded). Therefore, the department must withhold the information pertaining to the city jail in Exhibit 4 under section 552.101 of the Government Code in conjunction with section 418.182 of the Government Code. However, we find you have failed to demonstrate the remaining information in Exhibit 4 relates to the specifications, operating procedures, or location of a security system used to protect public or private property from an act of terrorism or related criminal activity. Consequently, we find the department may not withhold the remaining information in Exhibit 4 under section 552.101 in conjunction with section 418.182.

Section 552.101 of the Government Code also encompasses section 560.003 of the Government Code, which provides, “[a] biometric identifier in the possession of a governmental body is exempt from disclosure under [the Act].” Gov't Code § 560.003; *see id.* § 560.001(1) (“biometric identifier” means retina or iris scan, fingerprint, voiceprint, or record of hand or face geometry). There is no indication the requestor has a right of access to the submitted fingerprints under section 560.002. *See id.* § 560.002(1)(A) (governmental body may not sell, lease, or otherwise disclose individual's biometric identifier to another person unless the individual consents to disclosure). Accordingly, the department must withhold Exhibit 6 under section 552.101 in conjunction with section 560.003.

Section 552.101 of the Government Code also encompasses section 730.004 of the Transportation Code, which provides that “an agency may not disclose personal information about any person obtained by the agency in connection with a motor vehicle record.” Transp. Code § 730.004. “Personal information” includes a person’s name, address, and driver identification number, but not the zip code. *Id.* § 730.003(6). We note the Texas Department of Motor Vehicles (the “DMV”) is an “agency” for purposes of chapter 730. *See id.* § 730.003(1) (“agency” is state agency that compiles or maintains motor vehicle records). You inform us the information in Exhibit 3 was obtained by the department from the DMV for use by the department in carrying out its governmental functions. *See id.* § 730.007(a)(2)(A)(I) (personal information may be disclosed to government agency in carrying out its functions). An authorized recipient of personal information may not re-disclose the personal information and to do so is a misdemeanor offense. *Id.* § 730.013(a), (d). Accordingly, we find the department must withhold the information we have marked in Exhibit 3 under section 552.101 of the Government Code in conjunction with sections 730.004 and 730.013 of the Transportation Code.<sup>4</sup> However, we find the department has not demonstrated the remaining information in Exhibit 3 consists of personal information for the purposes of section 730.004, and none of it may be withheld under section 552.101 on that basis.

You also claim the remaining information in Exhibit 3 is excepted from disclosure under section 552.101 of the Government Code in conjunction with the Driver’s Privacy Protection Act of 1994 (the “DPPA”), section 2721 of title 18 of the United States Code. Section 2721 provides, in part:

(a) In general.—A State department of motor vehicles, and any officer, employee, or contractor thereof, shall not knowingly disclose or otherwise make available to any person or entity:

(1) personal information, as defined in 18 U.S.C. 2725(3), about any individual obtained by the department in connection with a motor vehicle record, except as provided in subsection (b) of this section[.]

...

(b) Permissible uses.—Personal information referred to in subsection (a) . . . may be disclosed as follows:

(1) For use by any government agency . . . in carrying out its functions[.]

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<sup>4</sup>As our ruling is dispositive, we need not address your remaining arguments against disclosure of this information.

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(c) Resale or redisclosure.—An authorized recipient of personal information (except a recipient under subsection (b)(11) or (12)) may resell or redisclose the information only for a use permitted under subsection (b) (but not for uses under subsection (b)(11) or (12)). . . . Any authorized recipient (except a recipient under subsection (b)(11)) that resells or rediscloses personal information covered by this chapter must keep for a period of 5 years records identifying each person or entity that receives information and the permitted purpose for which the information will be used and must make such records available to the motor vehicle department upon request.

18 U.S.C. § 2721(a)(1), (b)(1), (c). The DPPA defines “motor vehicle record,” in relevant part, as “any record that pertains to a motor vehicle operator’s permit . . . issued by a department of motor vehicles[.]” *Id.* § 2725(1). Section 2725 also defines personal information as “information that identifies an individual, including an individual’s photograph, social security number, driver identification number, name, address (but not the 5-digit zip code), telephone number, and medical or disability information, but does not include information on vehicular accidents, driving violations, and driver’s status.” *See id.* § 2725(3). You assert the remaining information in Exhibit 3 contains personal information the department obtained from DPS that is protected under the DPPA. However, upon review, we find the information at issue does not contain any personal information subject to section 2721. Accordingly, the department may not withhold the remaining information in Exhibit 3 under section 552.101 of the Government Code on that basis.

Section 552.101 of the Government Code also encompasses section 11 of article 49.25 of the Code of Criminal Procedure, which provides the following:

(a) The medical examiner shall keep full and complete records properly indexed, giving the name if known of every person whose death is investigated, the place where the body was found, the date, the cause and manner of death, and shall issue a death certificate. . . . The records may not be withheld, subject to a discretionary exception under [the Act] except that a photograph or x-ray of a body taken during an autopsy is excepted from required public disclosure in accordance with [the Act] but is subject to disclosure:

- (1) under a subpoena or authority of other law; or
- (2) if the photograph or x-ray is of the body of a person who died while in the custody of law enforcement.

Crim. Proc. Code art. 49.25, § 11. Upon review, we find one of the submitted photographs in Exhibit 5 is not a photograph or x-ray of a body; thus, the department may not withhold this information, which we have marked for release, under section 552.101 in conjunction with section 11 of article 49.25. The remaining information in Exhibit 5 consists of photographs and x-rays of a body taken during an autopsy. We find neither of the statutory exceptions to confidentiality is applicable in this instance. Accordingly, with the exception of the photograph we have marked for release, the department must withhold Exhibit 5 under section 552.101 in conjunction with section 11 of article 49.25.

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 established. *Id.* at 681-82. Types of information considered intimate and embarrassing by the Texas Supreme Court are delineated in *Industrial Foundation*. *Id.* at 683. Additionally, this office has concluded some kinds of medical information are generally highly intimate or embarrassing. *See* Open Records Decision No. 455 (1987). Further, this office has concluded personal financial information not relating to a financial transaction between an individual and a governmental body is generally intimate or embarrassing. *See* Open Records Decision Nos. 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). 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. We note that, because the common-law right to privacy is a personal right that lapses at death, common-law privacy does not protect information that relates only to a deceased individual. *Moore v. Charles B. Pierce Film Enters., Inc.*, 589 S.W.2d 489, 491 (Tex. App.—Texarkana 1979, writ ref'd n.r.e.); *see also* Attorney General Opinions JM-229 (1984), H-197 (1976); Open Records Decision No. 272 at 1 (1981).

You seek to withhold some of the remaining information under common-law privacy. Upon review, however, we note some of the information at issue pertains to a deceased individual; thus, this information may not be withheld on the basis of the deceased individual's privacy interests. We find portions of the remaining information that pertain to living individuals satisfy the standard articulated by the Texas Supreme Court in *Industrial Foundation*. Accordingly, the department must withhold this information, which we have marked and indicated, under section 552.101 of the Government Code in conjunction with common-law privacy. However, we find you have failed to demonstrate that any of the remaining information that pertains to living individuals is highly intimate or embarrassing and not of legitimate public concern. Therefore, the department may not withhold the remaining information under section 552.101 in conjunction with common-law privacy.

Section 552.101 of the Government Code also encompasses information protected by the common-law informer's privilege, which has long been recognized by Texas courts. *See Aguilar v. State*, 444 S.W.2d 935, 937 (Tex. Crim. App. 1969); *Hawthorne v. State*, 10 S.W.2d 724, 725 (Tex. Crim. App. 1928). The informer's privilege protects the identities of persons who report activities over which the governmental body has criminal or quasi-criminal law enforcement authority, provided the subject of the report does not already know their identities. Open Records Decision Nos. 515 at 2-3 (1988), 434 at 1-2 (1986), 208 at 1-2 (1978). For the informer's privilege to apply, the report must be of a violation of a criminal or civil statute. *See* Open Records Decision Nos. 582 at (1990), 515 at 3-4. The privilege affords protection to individuals who report violations of statutes to criminal law enforcement agencies, as well as those who report violations of statutes with civil or criminal penalties to "administrative officials having a duty of inspection or of law enforcement within their particular spheres." Open Records Decision No. 279 at 1-2 (1981) (citing 8 John H. Wigmore, *Evidence in Trials at Common Law*, § 2374, at 767 (J. McNaughton rev. ed. 1961)). However, witnesses who provide information in the course of an investigation but do not make a report of the violation are not informants for the purposes of the informer's privilege. You claim some of the remaining information identifies individuals who reported violations of law to the department. However, upon review, we find you have not demonstrated any of the information at issue identifies an individual who made a report of criminal activity to the department. Therefore, the department may not withhold the remaining information at issue under section 552.101 on the basis of the common-law informer's privilege.

We note portions of the remaining information may be subject to section 552.1175 of the Government Code.<sup>5</sup> Section 552.1175 protects the home address, home telephone number, emergency contact information, date of birth, social security number, and family member information of certain individuals when that information is held by a governmental body in a non-employment capacity and the individual elects to keep the information confidential. Gov't Code § 552.1175. Section 552.1175 applies, in part, to "peace officers as defined by Article 2.12, Code of Criminal Procedure[.]" *Id.* § 552.1175(a)(1). Some of the remaining information pertains to peace officers and is held by the department in a non-employment capacity. Thus, to the extent the officers whose information is at issue elect to restrict access to their information in accordance with section 552.1175(b), the department must withhold the information we have indicated under section 552.1175. If the peace officers at issue do not elect to restrict access to the information in accordance with section 552.1175(b), the department may not withhold this information under section 552.1175.

Section 552.130 of the Government Code provides information relating to a motor vehicle operator's or driver's license or permit, a motor vehicle title or registration, or a personal

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<sup>5</sup>The 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).

identification document issued by an agency of Texas or another state or country is excepted from public release. *Id.* § 552.130(a). The purpose of section 552.130 is to protect the privacy interests of individuals. As noted above, because the right of privacy lapses at death, information that pertains solely to a deceased individual may not be withheld under section 552.130 of the Government Code. *See Moore*, 589 S.W.2d at 491; *see also* Attorney General Opinions JM-229, H-917; ORD 272 at 1. Upon review, we note some of the information you have marked is not information that is subject to section 552.130; thus, the department may not withhold such information, which we have marked for release, under section 552.130. We conclude, with the exception of the information we have marked for release, the department must withhold the information you have marked, as well as the additional information we have marked and indicated for withholding, under section 552.130.

Section 552.136 of the Government Code states “[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.” Gov’t Code § 552.136(b). An access device number is one that may be used to (1) obtain money, goods, services, or another thing of value, or (2) initiate a transfer of funds other than a transfer originated solely by a paper instrument, and includes an account number. *Id.* § 552.136(a) (defining “access device”). Upon review, we find you have failed to demonstrate the information you have marked consists of a credit card, debit card, charge card, or access device number for purposes of section 552.136. Accordingly, the department may not withhold the information at issue under section 552.136.

Section 552.147 of the Government Code excepts from disclosure the social security number of a living person. *Id.* § 552.147. We note section 552.147 does not apply to the social security number of a deceased individual. Upon review, we find one of the partial social security numbers you have marked does not consist of a social security number of a living individual. Therefore, the department may not withhold this information under section 552.147. The department may withhold the social security numbers and partial social security numbers you have marked that pertain to living individuals under section 552.147.

In summary, the department must withhold the following: (1) 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; (2) the information we have marked under section 552.101 of the Government Code in conjunction with section 411.153 of the Government Code; (3) the video recording pertaining to the city jail in Exhibit 4 under section 552.101 of the Government Code in conjunction with section 418.182 of the Government Code; (4) Exhibit 6 under section 552.101 of the Government Code in conjunction with section 560.003 of the Government Code; (5) the information we have marked in Exhibit 3 under section 552.101 of the Government Code in conjunction with sections 730.004 and 730.013 of the Transportation Code; (6) Exhibit 5, with the exception of the photograph we have marked for release, under section 552.101 of the Government

Code in conjunction with section 11 of article 49.25 of the Code of Criminal Procedure; (7) the information we have marked and indicated under section 552.101 of the Government Code in conjunction with common-law privacy; (8) the information we have indicated under section 552.1175 of the Government Code if the officers whose information is at issue elect to restrict access to their information in accordance with section 552.1175(b); (9) the information you have marked and the additional information we have marked and indicated for withholding, under section 552.130 of the Government Code, with the exception of the information we have marked for release. The department may withhold the social security numbers and partial social security numbers you have marked that pertain to living individuals under section 552.147 of the Government Code. The department must release the remaining information.

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](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,



Lindsay E. Hale  
Assistant Attorney General  
Open Records Division

LEH/akg

Ref: ID# 537584

Enc. Submitted documents

c: Requestor  
(w/o enclosures)