



December 17, 2025

SENT VIA E-FILING

Office of the Attorney General
Attention: Open Records Division MC-014
P. O. Box 12548
Austin, Texas 78711-2548

Re: Public Information Request: G035201-120525

Dear Attorneys General:

The City of Georgetown (the “City”) received a Public Information Act Request on December 5, 2025. A copy of the Request is attached as Exhibit A. The Requestor has requested “[a] list of all open records requests (also known as public information requests) submitted to Georgetown, Texas, and all its departments except for the city's police department. We want the name and email of the requester, the information requested, and the date the request was received” from “January 1, 2025 to the date a search is conducted.” The City seeks a determination as to the applicability of the Act to the material responsive to the Request. Representative samples of each exception is attached at Exhibit B.

Government Code Section 552.101 and Common-Law Privacy– Insurance Carrier

The City believes that some of the information contained in Exhibit B is exempt from disclosure pursuant to Section 552.101 of the Government Code together with common-law privacy. Section 552.101 of the Government Code excepts from disclosure “information considered to be confidential by law, either constitutional, statutory, or by judicial decision.” *Id.* § 552.101. Section 552.101 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). The Attorney General has concluded personal financial information not relating to a financial transaction between an individual and a governmental body is generally highly intimate or embarrassing, including an employee’s choice of insurance carrier. *See* Open Records Decision Nos. 600 (1992). Therefore, because Exhibit B contains insurance carrier selections, the City believes this information must be withheld.

Government Code Section 552.137 - Members of the Public Email Addresses

The City believes that some of the information contained in Exhibit B is excepted from disclosure as confidential information pursuant to Government Code Section 552.137(a). In this

case, the City does not have consent to release the identified email addresses nor, to the City's knowledge, do the email addresses fit the confidentiality exclusions listed in Section 552.137(c). The City therefore believes the email addresses identified in Exhibit B is exempt from disclosure.

Government Code Section 418.181 – Texas Homeland Security Act

The City also believes that records at Exhibit B are exempt from disclosure pursuant to Government Code Section 552.101, together with the Homeland Security Act. Section 418.181 of the Government Code provides “[t]hose documents or portions of documents in the possession of a governmental entity are confidential if they identify the technical details of particular vulnerabilities of critical infrastructure to an act of terrorism.” *Id.* § 418.181.

Some of the responsive information contains detailed descriptions of critical infrastructure systems within the City, including technical information related to utility, drainage, public safety, and other essential services. Disclosure of such information could reveal specific vulnerabilities that might be exploited to disrupt or disable electrical, water, wastewater, stormwater, or emergency response systems. The release of these details could therefore compromise the safety and security of facilities essential to public health, safety, and continuity of government operations.

In addition, certain responsive records pertain to public facilities that, by their nature or function, are more susceptible to criminal activity or acts of terrorism. Releasing technical or operational details about these facilities could provide individuals intent on causing harm with information necessary to interfere with or debilitate critical systems, resulting in public safety risks, public health impacts, and potential financial consequences for the City and its residents.

For these reasons, the City believes that some of the information identified in Exhibit B is confidential under Government Code Section 418.181 and must be withheld.

Thank you for your attention to this matter. The City looks forward to receiving your response to its request for a determination regarding this Request.

Sincerely,

Lyndsay M. Lujan

Lyndsay M. Lujan
Senior Assistant City Attorney

Attachments: Exhibit A: Public Information Act Request
Exhibit B: Requested Information

cc (w/o attachments): Requestor