

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Raymond Bruni



9590 9403 0278 5155 5422 41

2. Article Number (Transfer from service label)

7014 1820 0000 4959 1892

PS Form 3811, April 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

Raymond Bruni

C. Date of Delivery

4/19/16

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
☐ Adult Signature Restricted Delivery
☒ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery

- ☐ Priority Mail Express®
☐ Registered Mail™
☐ Registered Mail Restricted Delivery
☐ Return Receipt for Merchandise
☐ Signature Confirmation™
☐ Signature Confirmation Restricted Delivery

Mail
 Mail Restricted Delivery
 (00)

Domestic Return Receipt

UNITED STATES POSTAL SERVICE

TX 78040
 RECEIVED APR 20 2016
 20 APR '16

First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. G-10

- Sender: Please print your name, address, and ZIP+4® in this box•

Laredo Housing Authority
 2000 San Francisco Ave.
 Laredo, TX 78040

Attn: Admin.

USPS TRACKING#



9590 9403 0278 5155 5422 41



ESCAMILLA & PONECK, LLP

ATTORNEYS AND COUNSELORS

Phone (210) 225-0001 • FAX (210) 225-0041 • escamillaponeck.com

April 28, 2016

VIA E-MAIL [REDACTED]

Raymond Bruni

Re: Request for Clarification regarding Open Records Request

Dear Mr. Bruni:

Our firm advises and assists the Laredo Housing Authority with open records requests. On April 15, 2016, you made an open records request, a copy is attached as **Exhibit "A"**, to the District. Pursuant to Texas Government Code § 552.222(b), this serves as a request for clarification regarding your request.

Specifically, you seek:

"communications text, emails, and any other form of communications from Melissa Ortiz and Jose Ceballos prior to the 01-27-16 LHA meeting"

In order to clarify your request and to perhaps narrow the scope of your request, please indicate: 1) for what period of time you are seeking this information (i.e. -- from what date to what date); 2) specify the person to whom you seek Melissa Ortiz' communications (i.e. -- between Ms. Ortiz and whom); 3) specify the person to whom you seek Jose Ceballos' communications (i.e. -- between Mr. Ceballos and whom); and 4) please confirm that you are only seeking Ms. Ortiz' and Mr. Ceballos' communications about Laredo Housing Authority business and that you are not seeking any attorney-client privileged communications.

Pursuant to Texas Government Code § 552.222(d), if by the 61st day after the date of this letter we do not receive a written response from you, your underlying request for public information will be considered withdrawn. Please note that Texas Government Code § 552.222(d) requires a *written* response from you. Your written response can be mailed or faxed to the address on the bottom of this letter or emailed to ddarby@escamillaponeck.com.

I look forward to your written response so that we might be able to clarify your request and then, provide you with any responsive information pursuant to the guidelines of Texas Public Information Act. If you should have any questions in the meantime, please do not hesitate to contact me.

700 North St. Mary's Street, Suite 850 • San Antonio, Texas 78205

San Antonio El Paso Houston Dallas Austin • Louisiana • Mexico City

Sincerely,

ESCAMILLA & PONECK, LLP

A handwritten signature in black ink, appearing to read 'Darin Darby', with a stylized flourish at the end.

DARIN DARBY

DD/cah
Enclosure as noted

cc: Melissa Ortiz (Via E-mail)
Doug Poneck (Via E-mail)

EXHIBIT “A”

----- Forwarded message -----

From: **Raymond Bruni** <[REDACTED]>

Date: Friday, April 15, 2016

Subject: Open Meetings Violations

To: "Jose L." <[REDACTED]>, Pete Saenz <[REDACTED]>, Juan Solis <[REDACTED]>, Raul Casso <[REDACTED]>, Jesus Olivares <[REDACTED]>, Zane Nguyen <[REDACTED]>, Roque Vela <[REDACTED]>

Dear Sir,

Doug Poneck attended the 01-27-16 LHA Board meeting. Please provide me communications text, emails, and any other form of communications from Melissa Ortiz and Jose Ceballos prior to the 01-27-16 LHA meeting. Thank you.

--

-Sent from Google Mobile

Jose L. Ceballos

[REDACTED]



ESCAMILLA & PONECK, LLP
ATTORNEYS AND COUNSELORS

Phone (210) 225-0001 • Fax (210) 225-0041 • escamillaponeck.com

April 29, 2016

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

The Honorable Ken Paxton
Attorney General, State of Texas
Open Records Section
P.O. Box 12548
Austin, Texas 78711-2548

Re: Open Records Request of Raymond Bruni Received on April 15, 2016

Dear Attorney General Paxton:

On April 15, 2016, the Laredo Housing Authority ("LHA") received a request for public information from Raymond Bruni seeking information relating to communications, text, emails, and other form of communications from Melissa Ortiz and Jose Ceballos prior to January 27, 2016 LHA meeting. See the request attached as **Exhibit "A"** which is a true and correct copy of the request submitted by Raymond Bruni. We have sent a clarification letter to the Requestor pursuant to Texas Government Code § 552.222(b) and hope to obtain a written clarification from the Requestor.

As the District awaits clarification, and out of an abundance of caution, the District respectfully requests that all possible exceptions from disclosure be preserved under the Texas Public Information Act, including but not limited to the following exceptions:

Confidential Information	TEX. GOV'T CODE §552.101
Personnel Information	TEX. GOV'T CODE §552.102
Information Relating to Litigation	TEX. GOV'T CODE §552.103
Information Relating to Bidding	TEX. GOV'T CODE §552.104
Information Relating to Property	TEX. GOV'T CODE §552.105
Certain Legislative Documents	TEX. GOV'T CODE §552.106
Certain Legal Matters	TEX. GOV'T CODE §552.107
Law Enforcement Records	TEX. GOV'T CODE §552.108
Private Communications of Office Holder	TEX. GOV'T CODE §552.109
Commercial Information	TEX. GOV'T CODE §552.110
Agency Memoranda	TEX. GOV'T CODE §552.111
Student Records	TEX. GOV'T CODE §§552.026, 552.114
Birth and Death Records	TEX. GOV'T CODE §552.115
Audit Working Papers	TEX. GOV'T CODE §552.116
Public Employee Contact and Family Information	TEX. GOV'T CODE §552.117
Photographs of Peace Officers	TEX. GOV'T CODE §552.119
Test Items	TEX. GOV'T CODE §552.122

The Honorable Ken Paxton
April 29, 2016
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Name of Applicant for Superintendent	TEX. GOV'T CODE §552.126
Motor Vehicle Records	TEX. GOV'T CODE § 552.130
Potential Vendor Information	TEX. GOV'T CODE §552.128
School District Informers	TEX. GOV'T CODE §552.135
Credit Card and Access Device Numbers	TEX. GOV'T CODE §552.136
Certain E-mail Addresses	TEX. GOV'T CODE §552.137

Upon clarification, and if necessary, the District will send within fifteen (15) business days of the date the District received the request for information, being April 15, 2016, additional information supporting the request for a decision, including copies of any responsive documents containing the information that may be protected under the Act and supporting arguments and law.

By copy of this letter, the District is informing Mr. Bruni of its request, if necessary, to the Attorney General for a decision about whether the information is within an exception to public disclosure and of its intent to withhold the requested information, if necessary, following clarification, until a decision is made by your office pursuant to this request.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

ESCAMILLA & PONECK, LLP

DARIN DARBY

DD/ch
Enclosure as noted

cc: Raymond Bruni (*Via E-mail* [REDACTED])

Melissa Ortiz (*Via E-mail*)
Doug Poneck (*Via E-mail*)

EXHIBIT “A”

----- Forwarded message -----

From: **Raymond Bruni** <[REDACTED]>

Date: Friday, April 15, 2016

Subject: Open Meetings Violations

To: "Jose L." <[REDACTED]>, Pete Saenz <[REDACTED]>, Juan Solis <[REDACTED]>, Raul Casso <[REDACTED]>, Jesus Olivares <[REDACTED]>, Zone Nguyen <[REDACTED]>, Roque Vela <[REDACTED]>

Dear Sir,

Doug Poneck attended the 01-27-16 LHA Board meeting. Please provide me communications text, emails, and any other form of communications from Melissa Ortiz and Jose Ceballos prior to the 01-27-16 LHA meeting. Thank you.