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May 20, 2026

VIA E-FILE

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

Re: Response to complaint filed by Isaak Ruiz alleging overcharging for copies of public information under the Public Information Act; ID # OR 26-009700-CC

Dear Attorney General Paxton:

On May 6, 2026, the Eagle Pass Independent School District (“EPISD”) received correspondence from your Office to advise of the above referenced complaint and to further advise EPISD that it was required to submit a written response to inquiries outlined in your correspondence within ten business days after the date of the receipt of the letter.

In compliance, EPISD provides the following information:

QUESTION NO. 1: How did the district determine the number of personnel hours necessary to produce the responsive information? Please describe the process in a step-by-step manner, stating the time each step will take. If a sample test was performed, please provide a brief description of the results of the test.”

RESPONSE:

The documents related to the request submitted by Requestor Isaak Ruiz pertain to the planning, purchasing, and the holding of the pre-Super Bowl Luncheon that the District puts on each year for the purpose of employee morale. The information requested is maintained by two separate departments within the District – the Special Events Department and the Business & Finance – Accounting Department. As mentioned in response to question No. 2, these records exist in both paper and electronic format.

As will be revealed in the discussion below, due to the work necessary to locate and compile the responsive documents, employing the use of a sample test was not workable. To locate and identify the documents for the requested three-year period necessitated the page-by-page review of documents within numerous files and binders. Thus, the time required in locating and compiling the documents responsive to the request informed the District of the staff time necessary to respond to the request.

700 North St. Mary’s Street, Suite 850 · San Antonio, Texas 78205

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A. Special Events Department

Step 1: The Special Events Department is comprised of 2 employees, and amongst their other duties and responsibilities, the time spent locating and compiling responsive documents for the requested three-year period took place over the course of two separate days. For the types of events requested – i.e. pre-Super Bowl luncheons – the 2 employees split up the responsibilities for locating and compiling the requested information.

Often, when working on events such as the Pre-Super Bowl Luncheon, one employee or the other will have some communications and/or attached documents to which the other does not have access. Therefore, initially, each employee searched their respective emails for the internal communications requested covering the 2023, 2024, and 2025 years, and for any documents attached to said communications. Any responsive documents and communications located were then placed in a folder. The employees kept track of the time they spent locating and compiling the documents by noting the time the search started and ended. Upon completion of the search, the employees would then subtract any time devoted to other tasks, such as answering phone calls or bathroom trips, etc. to arrive at the total time spent in the search. The employees then rounded down to the nearest hour to ensure a conservative assessment of their time taken for the performance of these tasks.

Time: 2 Hours

Step 2: Additionally, the employees searched the physical files for the categories of documents, such as invoices from local and online vendors. These documents are kept in physical Binders so the Binders containing the categories of documents were located and pulled. It should be noted that there were several Binders containing hundreds of documents that were pulled for review to locate and compile the requested information.

The employees thereafter conducted a page-by-page review of the Binders for the requested time periods to identify the specific responsive information. Moreover, upon locating responsive information, such as invoices, an item-by-item review was also necessary as the invoices included bulk orders, which pertained to several different events. This line-by-line review was necessary to identify the specific expenses related to the Super Bowl event (i.e. the requested information). Once identified, these responsive records were then compiled, scanned, and placed back in the Binders in the same order. Once again, the employees kept track of their time spent performing these tasks in the same manner as noted above.

Time: 4 hours

Information pertaining to the vendors used and the accounts involved for the Pre-Super Bowl Luncheon was then shared with the Accounting Department to continue the search for additional requested information.

B. Business & Finance – Accounting Department

Step 1: Upon receipt of the information from the Special Events Department, the Business & Finance – Accounting Department employees then continued the District’s search to locate and compile responsive information relating to the respective payment files where the documentation was located. Specifically, the employees searched through each of the General Ledger electronic database systems for the three fiscal years included within the Request for Information, such as payment dates and methods of payment - Purchase Orders, Request for Payments, Credit Card Payments, and/or for Local Event Catering.¹ The employees kept track of the amount of time spent on performing these tasks in the same manner as noted above.

Time: .5 hours

Step 2: With this payment method information, the Accounting Department employees then had to search for records in the appropriate physical payment files. Payments made through purchase orders and requests for payment are kept in one filing cabinet. Payments made through credit cards are kept in another filing cabinet. And journal entries are kept in a third filing cabinet.

In total, there are approximately 40,000 payment records for each fiscal year. Records are filed in alphabetical order (vendor name) and by the date paid. Regarding journal entries, there are approximately 200 journal entry transactions for each fiscal year. Journal vouchers are sorted by year and month.

The only way to locate responsive documents was to go through the physical documents described above. This process of locating the documents also resulted in the compilation of the responsive documents. Again, the employees kept track of the amount of time spent on performing these tasks in the same manner as noted above.

Time: 1.5 Hours

Additionally, due to limited space, the above documents are kept in two separate buildings. The most recent requested fiscal year of 2025 was located at the District’s Main Office location of 587 Madison St. Fiscal years 2023 and 2024 were stored at the District’s DAEP record storage building located at 1610 Del Rio Blvd. The distance between these locations is approximately 2.5 miles round trip.

The records at the storage facility are in banker type boxes and stacked by vendor name in alphabetical order. For the 2 requested years, staff were required to move boxes to get to the specific boxes containing the responsive documents. Once the boxes were separated, the employees searched through the boxes to locate and compile the information responsive to the

¹ It should be noted that payments for Catering Events are located through search of journal entries because such individual expenses are charged against accounts and do not involve the generation of a purchase order or check for each specific item of expense. Rather, checks are processed at certain intervals which include all the charges to the account during the time period covered by the payment.

request. Once again, the employee kept track of the amount of time spent on performing these tasks in the same manner as noted above.

Time: 1 Hour

The total of the time reflected above was then used to determine the number of personnel hours necessary to produce the responsive information. This was the time sent to the Requestor as a cost estimate.

QUESTION NO. 2: Does the information requested exist in paper form, electronic form, or both? Please explain which records exist in paper form, and which exist in electronic form.

RESPONSE:

The documents responsive to the request are kept in both paper and electronic format. As mentioned above, there are two different departments which maintain records related to this request. Within the Special Events Department, records that exist in electronic format are email threads detailing communications pertaining to the pre-Super Bowl events. Paper documents include invoices, invites, receipts, and the documents maintained in Binders. Within the Business & Finance – Accounting Department, the General Ledgers exist in electronic format, and the actual payment file records, such as purchase orders, check requests, credit card payments, and journal entries exist only in paper form.

QUESTION NO. 3: Where are the records physically located? If the records are in two or more separate buildings, please provide a simple map showing the location of the buildings, including thoroughfares.

RESPONSE:

The documents maintained by the Special Events Department are located at the Eagle Pass ISD District Service Center located at 587 Madison St., Eagle Pass, TX 78852. The documents maintained by the Business & Finance – Accounting Department are kept in two separate locations. The Accounting Department Main Office located at 587 Madison St., Eagle Pass, TX 78852 and the DAEP Record Storage Location located at 610 Del Rio Blvd, Eagle Pass, TX 78852. Please see the Google Map, attached as **Exhibit “A”**.

QUESTION NO. 4: Will any information be redacted from the records? If so, what information will be redacted, and will the redaction be done manually, electronically, or a combination of both? Please state which exceptions to disclosure apply and if the authority plans to seek a ruling for the requested information.

RESPONSE:

If it becomes necessary, the District intends to redact certain account number information from the responsive documents in accordance with Section 552.136 of the Texas Government Code. As per the provisions of this section, the District is allowed to redact account information without the necessity of requesting a decision from the Office of the Attorney General. *See 552.136(c) Tex.*

Gov't Code. If, and when, the redactions are made, the District will provide the required information to the Requestor and comply with the provisions of 552.136(e) Tex. Gov.t Code.

Additionally, the District intends to redact any nonresponsive information included in the responsive information.

The District anticipates that the redactions will be done electronically.

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

Sincerely,

ESCAMILLA & PONECK, LLP

A handwritten signature in black ink, appearing to read 'VIC', with a stylized flourish extending to the right.

VICTOR I. CERDA

VIC/cah
Encl.

cc: Isaak Ruiz (Via e-mail)
Maria Fuentes (Via e-mail)

EXHIBIT “A”

Best 4 min 27 min 7 min —

587 Madison St, Eagle Pass, TX 78852
 1610 Del Rio Blvd, Eagle Pass, TX 78852

Add destination

Leave now Options

Send directions to your phone Copy link

via Del Rio Blvd **4 min**
 Fastest route, the usual traffic 1.2 miles
 Details Preview

via N Ceylon St and Del Rio Blvd **4 min**
 1.2 miles

via Ferry St, N Ceylon St and Del Rio Blvd **4 min**
 1.3 miles

Explore nearby 1610 Del Rio Blvd

Restaurants Hotels Gas stations Parking Lots More

New! Continue your trip, tap the notification on your phone to get directions

