



March 20, 2026

Via Online Submission

Office of the Attorney General
Open Records Division
State of Texas
P.O. Box 12548
Austin, Texas 78711-2548

RE: Public information request received on March 6, 2026 (the "Request") by the Town of Addison (the "City") from requestor Ryan Johnson (the "Requestor") -- (our file reference 13172)

Dear Open Records Division:

As City Attorney for the Town of Addison, Texas ("City"), we are writing to request an opinion on the above referenced request for public information. A true and correct copy of the Request is enclosed and incorporated herein as **EXHIBIT A**. The City believes portions of the information responsive to this request are excepted from public disclosure pursuant to Texas Government Code Section 552.107. We have attached the responsive information hereto as **EXHIBIT B**¹.

1. Section 552.107 Confidential Information: Attorney-Client Privilege

It is the City's position that the responsive information marked "§552.107(1)" attached in **EXHIBIT B** may be exempt from disclosure pursuant to Section 552.107(1) of the Government Code, which provides as follows:

TEXAS GOVERNMENT CODE SEC. 552.107. EXCEPTION: CERTAIN LEGAL MATTERS.

"Information is excepted from the requirements of Section 552.021 if:

(1) it is information that the attorney general or an attorney of a political subdivision is prohibited from disclosing because of a duty to the client under the Texas Rules of Evidence or the Texas Disciplinary Rules of Professional Conduct ; [...]"

The City asserts that responsive information marked "§ 552.107(1)" within **Exhibit B** includes a communication between the City and outside counsel (Bracewell LLP) and, therefore, is protected from disclosure under Section 552.107(1) based on the following:

¹ The remaining responsive records for which the Town is not seeking an Attorney General opinion have been released to the requestor as of today.

This document contains an email communication between outside legal counsel with Bracewell LLP and their client, the Town of Addison. A staff member was involved in sending or receiving this communication with outside legal counsel. The communication clearly demonstrates that it was transmitted for the purpose of rendering professional legal services to the City and facilitating further legal advice or guidance. This attorney-client communication was and remains confidential and was used to facilitate Bracewell LLP in rendering legal advice to the City. It was not intended to be disclosed to third persons other than those to whom disclosure was made in furtherance of the rendition of professional legal services to the City. Finally, the City has confirmed that it has not waived the attorney-client privilege and this communication has remained confidential. Therefore, this document should be excepted from disclosure under Section 552.107(1).

2. Tex. Gov't Code, Section 552.301(d)(2): Providing Copies to Requestor

In accordance with Section 552.301(d)(2) of the Texas Government Code, we will provide the Requestor with a copy of this letter providing the required notice that an Attorney General's Opinion is being sought with regard to this request.

Please do not hesitate to contact me should you need anything further.

Sincerely,



Ashley L. White
City Attorney
Enclosures

Cc: Requestor: via email (ryanjohnsonthepatriot@gmail.com)

Town of Addison (via email)

EXHIBIT A
Request
(attached)

Open Records Request (#W013172-030626)

▼ Open Records Request Details

Type of Information Requested: Other

Public Record Desired: Pursuant to the Texas Public Information Act (Chapter 552, Government Code), I am requesting the following public records. Please note that for all digital communications, this request includes private devices used for official business per Tex. Gov't Code § 552.233 (SB 944).

I. The "Whisper" & Suppression Records (March 3 – March 6, 2026)

All text messages, emails, and instant messages (Slack, Teams, etc.) between City Manager David Gaines and Police Chief Chris Freis containing the keywords: "Ryan," "Johnson," "Patriot," "Removal," "Speaker," "SIB," or "Debt."

The Body-Worn Camera (BWC) footage and audio for Officer "Ryan" and Chief Chris Freis from 6:30 PM to 10:00 PM on March 3, 2026.

Any written "Security Directives" or "Briefing Notes" provided to the Addison Police Department regarding the March 3rd Town Meeting.

II. The SIB Loan & "Denton Blueprint" Extraction

The Full Disbursement Ledger for the \$44.6 Million State Infrastructure Bank (SIB) Loan. I am specifically seeking the "Check Register" showing every payment made out of this loan fund to third-party vendors, consultants, or "Administrative Transfers."

All correspondence between David Gaines and representatives of Hilltop Securities regarding the "Amortization Schedule" or "Interest Rate Swap" agreements for the SIB loan.

Any memos or emails discussing the "Negative Arbitrage" or "Debt-to-Cash Spread" associated with the Town's current \$177M debt load.

III. The "Police Supply" Forensic Audit

The Line-Item Expenditure Report for the "Police Supplies" account for FY2023, FY2024, and FY2025.

Records of all "Inter-fund Transfers" into the Police Department budget from the General Fund or Capital Project Funds that occurred mid-year (outside the original budget adoption).

All invoices and receipts for "Police Supplies" or "Specialized Equipment" exceeding \$5,000 per transaction for the last 24 months.

IV. Administrative Capture & Conflict of Interest

Any "Consulting Agreements" or "Professional Service Contracts" between the Town of Addison and any entity previously associated with David Gaines during his tenure in Denton, Texas.

All internal communications regarding the proposed \$55 Million Police Station, specifically any "Feasibility Studies" or "Bond Counsel" advice regarding the impact on the Town's current debt ceiling.

Notice of Election to Inspect:

To avoid the unnecessary "labor fees" previously quoted by the Town's counsel (Ref: 13125), I hereby elect to inspect these records in person at Town Hall pursuant to Tex. Gov't Code § 552.221. Please notify me when these files are available for my review.

Respectfully,

Ryan Johnson
Author of The Lucky Enclave

> Clarification(s) Requested/Required

> Clarification(s) Received

> Activity Generation -- Records Collection (EZchecklist)

> Payment Information

> Extension Information

> AG Information

▼ Message History

Date

On 3/6/2026 10:20:41 AM, System Generated Message:
Message sent to: **Ryan Johnson**
Subject: [Town of Addison] Open Records Request :: W013172-030626
Body:



03/06/2026

Ryan Johnson
4910 Goodman Ave apt 3924
Addison TX 75001

RE: OPEN RECORDS REQUEST RECEIVED 3/6/2026, REFERENCE # W013172-030626

Dear Mr./Ms. Johnson,

Welcome to the Town of Addison Open Records Center. The Town received your Open Records Request on 3/6/2026 asking for "Pursuant to the Texas Public Information Act (Chapter 552, Government Code), I am requesting the following public records. Please note that for all digital communications, this request includes private devices used for official business per Tex. Gov't Code § 552.233 (SB 944).

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Respectfully,

Ryan Johnson

Author of The Lucky Enclave. Your request has been assigned Number W013172-030626.

Town staff will review your request and start compiling the responsive records if possible. Please be advised that the Town may seek additional clarification of your request. In addition, the Town may collect a fee as prescribed by law to provide the requested records. If the responsive information contains confidential information or information that is exempted from disclosure, your request may be forwarded to the Town Attorney's Office. You will be contacted again as soon as the Town's review is complete, but no later than ten (10) business days from the date your request was received.

[Click Here](#) to monitor the progress of your request.

Thank you for using the Open Records Center

Sincerely,

Valencia Garcia

Town of Addison

On 3/6/2026 10:19:45 AM, Ryan Johnson wrote:
Request Created on Public Portal

▼ Request Details

Reference No: W013172-030626
Create Date: 3/6/2026 10:20 AM
Update Date: 3/6/2026 10:20 AM

Completed/Closed: No
Required Completion Date: 3/20/2026

Status: Assigned
Priority: Medium
Assigned Dept: City Secretary
Assigned Staff: Valencia Garcia

Customer Name: Ryan Johnson
Email Address: ryanjohnsonthepatriot@gmail.com
Phone: 7064741296
Group: (Not Specified)

Source: Web