

REAL ESTATE MINDSET

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October 26, 2026

Jim Robinson, Chairman
Board of Directors, Harris Central Appraisal District
13013 Northwest Freeway, Houston, Texas 77040
Via e-mail: Jim.Robinson@hcad.org

Cc: Adam Bogard, Chief Appraiser (Adam.Bogard@hcad.org); Morgan B. Morrow, Olson & Olson, L.L.P. (mmorrow@olsonllp.com); openrecords@hcad.org; Tammy; Karina; Jennifer

Re: Attorney General Letter Ruling OR2026-047943 (ID# 26-046346), issued October 23, 2026 — HCAD Order No. 200034341 — Internal Fraud and Misconduct Investigation Records — Demand for Full and Prompt Release

Chairman Robinson:

I am writing to you directly because the Board of Directors answers for how this District spends public money and for how it treats the public's right to see its records. On October 23, 2026, the Texas Attorney General ruled against the District, in full, on my request for internal investigation files concerning allegations of fraud, embezzlement, theft, bribery, self-dealing, misuse of public funds or property, and undisclosed conflicts of interest by District board members, ARB members, officers, and employees. The District lost every argument it made. I am asking the Board to see that the District now complies — completely, and without another round of delay.

1. What the District asked the Attorney General to let it hide

The District's August 19, 2026 notice listed seven exceptions to disclosure: Sections 552.101, 552.102, 552.107, 552.108, 552.111, 552.117, and 552.142 of the Government Code. When the District filed its brief, it argued one of them — Section 552.101, on theories of common-law and constitutional privacy. The Attorney General rejected both. On common-law privacy, the ruling finds the District has “not demonstrated any of the information at issue is highly intimate or embarrassing and not of legitimate public concern.” On constitutional privacy, it finds the District failed to show that any part of the information falls within the zones of privacy or implicates an individual's privacy interests. The operative sentence is short:

“As no further exceptions to disclosure have been raised, the district must release the submitted information.”

Put plainly: the District asked the Attorney General to keep the public from seeing how it investigated allegations of fraud and bribery inside its own walls, and the Attorney General said no. The ruling rests on decades of the Attorney General's own decisions holding that the public has a legitimate interest in how public employees perform their jobs. None of that authority is new. It was available to the District's counsel before the first page of the brief was written.

2. What this cost, and who paid for it

The District received this request on August 5, 2026. The ruling issued 79 days later. In between, outside counsel retained at public expense prepared a ten-day notice listing seven exceptions, a brief arguing one, and the correspondence that followed, all in defense of a position the Attorney General found the District had not supported. I filed requestor comments with the Attorney General and paid the filing fee myself. The property owners of Harris County paid for the other side.

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This is not an isolated result. On October 14, 2026, in OR2026-046184 (HCAD Order No. 200034114), the Attorney General likewise rejected the District's common-law privacy claim in full and ordered the remaining information released. Two rulings in ten days. Two privacy claims. Two rejections. An appraisal district asks every property owner in this county to trust its numbers. Spending public money to keep its own fraud and misconduct investigations out of public view is the opposite of earning that trust.

3. What I am asking the District to do

- (1) **Release the records by Monday, November 2, 2026.** Produce all information the District submitted to the Attorney General in this matter, electronically to travis@realestatemindset.org. No privacy redactions survive the ruling.
- (2) **Limit redactions to Section 552.117.** The ruling notes the District redacted Section 552.117(a)(1) information under Section 552.024(c). I do not contest redaction of an employee's home address, home telephone number, emergency contact information, social security number, or family member information where that employee has elected confidentiality. Please mark each such redaction so it is clear nothing else was removed.
- (3) **Account for 2021 and 2022.** My request covers January 1, 2021 forward. The District's brief recites a start date of January 1, 2023. Please produce responsive records from 2021 and 2022, or state in writing that none exist after a search of those years.
- (4) **No new charge.** These records were already located, processed, and submitted to the Attorney General. I do not expect a charge for releasing them. If the District contends otherwise, tell me in writing before any work is done.
- (5) **Tell me by Friday, October 30, 2026 whether the District will comply or sue.** A governmental body that disagrees with a ruling has 30 calendar days from receipt to file suit challenging it. If the District intends to spend more public money contesting this ruling in court, the public is entitled to know that now.
- (6) **A public accounting from the Board.** I ask that the Board direct the Chief Appraiser to report, in open session at the Board's next regular meeting, the amount the District has paid outside counsel in 2026 to seek Attorney General rulings on my public information requests.

4. Reservation of rights

If the District does not release the records as the ruling requires, I reserve every remedy available to me, including a petition for writ of mandamus under Section 552.321 and a complaint to the Harris County District Attorney under Section 552.3215. My prior preservation demands remain in effect for all records responsive to this request. I intend to publish the ruling and, once released, the records.

The Attorney General has done its part. The decision of what happens next belongs to the District, and the Board is accountable for it. I look forward to the District's written answer by Friday, October 30, and to the records by Monday, November 2.

Respectfully,

Travis Spencer

Independent Investigative Journalist

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