

Before the Presiding Judges of the Administrative Judicial Regions
Per Curiam Rule 12 Decision

APPEAL NO.: 26-006

RESPONDENT: Justice of the Peace, Precinct 4, Williamson County

DATE: May 27, 2026

SPECIAL COMMITTEE: Judge David Evans, Chair; Judge Sid Harle; Judge Missy Medary; Judge Ben Woodward; Judge Susan Brown

Petitioner submitted a Public Information Act request to the Williamson County Justice of the Peace, Precinct 4, seeking certain security camera footage and logs connected to Petitioner's appearance at the courthouse building. Petitioner also sought records that discussed Petitioner's visit to the courthouse, communications between the Justice of the Peace and the Constable's Office about the visit, and any other documentation regarding Petitioner's interactions with courthouse personnel. As to the communications records regarding Petitioner's visit, Respondent informed Petitioner that it did not have records responsive to the request. And as for the security camera footage and logs, Respondent stated that it was withholding responsive records under Rule 12.5(i) (*Information Confidential Under Other Law*). Respondent explained to Petitioner that Rule 12.5(i) made information confidential under other law exempt from disclosure and that, because the sought-after information was confidential under the Texas Homeland Security Act, responsive records were not subject to disclosure. In its petition for review, Petitioner challenged Respondent's application of the security exemption as "broader than necessary" because disclosure could be achieved through redaction. Respondent, in a reply to the petition, argued that its Rule 12.5(i) disclosure exemption claim rested upon Section 418.177 and Section 418.181, Government Code. On appeal, Respondent raised additional Rule 12.5 exemption claims.

We previously considered the application of Rule 12.5(i) in relation to security camera materials in Rule 12 Dec. No. 21-015. The petitioner in that decision sought copies of recordings from security cameras located in a sub-courthouse. We concluded that the recordings from security cameras identified specifications of the video recording system, including technical details and vulnerabilities, which implicated Section 418.182 of the Government Code (*Confidentiality of Certain Information Relating to Security Systems*) and made the records exempt from disclosure under Rule 12.5(i). We tackled a similar issue in Rule 12 Dec. No. 24-004, which involved security camera materials covering a justice court courtroom, and we likewise concluded that materials were covered by Section 418.182 and thus exempted by Rule 12.5(i). In the instant case, Petitioner's security camera footage and logs request very much parallels the requests at issue in the above-referenced decisions. Where this appeal differs from those is the grounding of Respondent's Rule 12.5(i) invocation, which rests atop Section 418.177 (*Confidentiality of Certain Information Relating to Risk or Vulnerability Assessment*) and Section 418.181 (*Confidentiality of Certain Information Relating to Critical Infrastructure*) of the Government Code.

Rule 12.5(i) requires that a record be “confidential or exempt from disclosure under a state or federal law.” It does not, however, require that the exemption claim fit into a certain portion of the Texas Homeland Security Act or a certain portion of a statute creating confidentiality of information. It merely requires that the record be confidential or exempt under law. Having reviewed *in camera* the materials submitted by Respondent, we conclude that — as was the case in Rule 12 Dec. Nos. 21-015 and 24-004 — the responsive materials sought here would be covered by Section 418.182, Government Code (*Confidentiality of Certain Information Relating to Security Systems*) because they contain information relating to the specifications, operating procedures, or location of the courthouse security system. This would render the records exempt from disclosure under Rule 12.5(i), and we therefore have no need to examine Section 418.177 and Section 418.181 in the instant appeal.

Accordingly, the security camera footage and logs in question are exempt from disclosure under Rule 12.5(i). And because the records are exempt under Rule 12.5(i), we need not consider Respondent’s Rule 12.5(b) exemption claim. For the reasons stated above, then, the petition is denied.