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June 9, 2026

**VIA CMRRR: 9589 0710 5270 0492 4799 54**

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

RE: Wayne McKnight's Public Information Act request to the Colorado County Sheriff's Office dated May 26, 2026 regarding records concerning former CCSO Deputy Tomas Ramirez

Dear General Paxton:

On May 27, 2026, the Colorado County Sheriff's Office received a request pursuant to the Public Information Act (the Act) dated May 26, 2026 at 6:53PM. This request asked for "copies of the following records held by the Colorado County Sheriff's Office concerning former CCSO Deputy Tomas Ramirez and the conduct alleged to have occurred in or about September 2024 that resulted in his prosecution under Tex. Penal Code § 39.04 and deferred adjudication community supervision in or about 2025. Without limiting the foregoing, I specifically request:

1. All CCSO incident, offense, and supplemental reports;
2. All internal investigation files, supervisor reviews, and administrative investigation records;
3. All body-worn camera, in-car camera, jail surveillance, and audio recordings related to the conduct, the response, or the investigation;
4. All written, recorded, or transcribed witness statements, including those of inmates housed at the Colorado County Jail, CCSO personnel, and any third-party witnesses;
5. All personnel-file records concerning Ramirez's discipline, separation, suspension, or other employment action related to this conduct, including any TCOLE F-5 separation report;
6. All communications (including email, text, and memoranda) between CCSO personnel and any external investigating agency — including but not limited to the Texas Department of Public Safety / Texas Rangers and the Colorado County Attorney's Office — regarding Ramirez or the underlying conduct;
7. All Prison Rape Elimination Act (PREA) screenings, intake records, complaint logs, investigative records, and reports related to the alleged conduct or the alleged victim;
8. All policies, procedures, and training records in effect at CCSO at the time of the conduct regarding inmate-staff sexual contact, PREA compliance, supervision of female inmates, and reporting requirements;

9. All remedial measures, policy revisions, training, or other corrective actions undertaken by CCSO following the disposition of the criminal case.”

The requested information set forth in the request may be exempt from public disclosure and required to be withheld under the following exceptions of the Texas Public Information Act:

Texas Government Code § 552.101	Public Records When Information Requested Is Confidential by Law
Texas Government Code § 552.107	Certain Legal Matters
Texas Government Code § 552.1175	Certain Personal Identifying Information of Peace Officers
Texas Government Code § 552.130	Certain Motor Vehicle Records
Texas Government Code § 552.147	Social Security Numbers

The Colorado County Sheriff's Office hereby requests an attorney general decision and will submit written comments stating the reasons for withholding the requested information along with the requested information on or before the 15th business day after the date of receipt of the request, pursuant to section 552.301(e) of the Texas Government Code.

Your time and attention to this matter are appreciated.

Sincerely,



J. Eric Magee

JEM/jm

Enclosures

cc: Wayne McKnight, requestor

**From:** Wayne McKnight <[wayne.mcknight@gmail.com](mailto:wayne.mcknight@gmail.com)>  
**Sent:** Tuesday, May 26, 2026 6:53 PM  
**To:** Eugenia Behrens <[eugenia.behrens@co.colorado.tx.us](mailto:eugenia.behrens@co.colorado.tx.us)>; Justin Lindemann <[justin.lindemann@co.colorado.tx.us](mailto:justin.lindemann@co.colorado.tx.us)>  
**Cc:** Eric Magee <[e.magee@allison-bass.com](mailto:e.magee@allison-bass.com)>; Jay Johannes <[jay.johannes@co.colorado.tx.us](mailto:jay.johannes@co.colorado.tx.us)>  
**Subject:** Texas Public Information Act Request — Records Concerning Former Deputy Tomas Ramirez

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Harold Wayne McKnight  
103 Irwin Drive  
Columbus, Texas 78934  
[wayne.mcknight@gmail.com](mailto:wayne.mcknight@gmail.com)  
May 26, 2026

Sheriff Justin Lindemann  
Colorado County Sheriff's Office  
3122 Highway 71 South  
Columbus, Texas 78934

Re: Texas Public Information Act Request — Records Concerning Former Deputy Tomas Ramirez

Sheriff Lindemann:

Pursuant to the Texas Public Information Act, Tex. Gov't Code Chapter 552, I respectfully request copies of the following records held by the Colorado County Sheriff's Office concerning former CCSO Deputy Tomas Ramirez and the conduct alleged to have occurred in or about September 2024 that resulted in his prosecution under Tex. Penal Code § 39.04 and deferred adjudication community supervision in or about 2025. Without limiting the foregoing, I specifically request:

1. All CCSO incident, offense, and supplemental reports;
2. All internal investigation files, supervisor reviews, and administrative investigation records;
3. All body-worn camera, in-car camera, jail surveillance, and audio recordings related to the conduct, the response, or the investigation;
4. All written, recorded, or transcribed witness statements, including those of inmates housed at the Colorado County Jail, CCSO personnel, and any third-party witnesses;
5. All personnel-file records concerning Ramirez's discipline, separation, suspension, or other employment action related to this conduct, including any TCOLE F-5 separation report;
6. All communications (including email, text, and memoranda) between CCSO personnel and any external investigating agency — including but not limited to the Texas Department of Public Safety / Texas Rangers and the Colorado County Attorney's Office — regarding Ramirez or the

underlying conduct;

7. All Prison Rape Elimination Act (PREA) screenings, intake records, complaint logs, investigative records, and reports related to the alleged conduct or the alleged victim;

8. All policies, procedures, and training records in effect at CCSO at the time of the conduct regarding inmate-staff sexual contact, PREA compliance, supervision of female inmates, and reporting requirements;

9. All remedial measures, policy revisions, training, or other corrective actions undertaken by CCSO following the disposition of the criminal case.

**PUBLIC-COURT-RECORD CATEGORY.** To the extent any responsive record has been filed with, attached to, introduced before, or otherwise made part of any court proceeding in this matter, that record is public information under Tex. Gov't Code § 552.022(a)(17) and may not be withheld under § 552.108, § 552.103, or any other discretionary exception. See Open Records Decision Nos. 665 (2000), 664 (1999), and 177 (1977). The only exceptions that survive against subsection (a)(17) are mandatory confidentiality statutes (e.g., HIPAA, Tex. Code Crim. Proc. arts. 57 and 57A).

**DEFERRED-ADJUDICATION CARVE-OUT, § 552.108(a)(2) AND (b)(2).** The criminal investigation and prosecution of Mr. Ramirez resulted in deferred adjudication community supervision. By the plain text of Tex. Gov't Code § 552.108(a)(2) and § 552.108(b)(2), records of an investigation that resulted in deferred adjudication are not excepted from disclosure under those subsections.

**INTERFERENCE REBUTTAL, § 552.108(a)(1) AND (b)(1).** The investigation closed upon entry of judgment. Disclosure of records of a completed prosecution cannot interfere with the detection, investigation, or prosecution of crime within the meaning of § 552.108(a)(1) or (b)(1). Probation enforcement and modification proceedings administered by the community supervision department are not "detection, investigation, or prosecution of crime" within the meaning of the statute. See Open Records Decision No. 549 (1990) (interference exception requires actual showing of interference with an ongoing matter, not speculative future enforcement). To the extent CCSO contends (a)(1) or (b)(1) applies, please specifically identify the ongoing matter and the manner in which release would interfere.

**LITIGATION-EXCEPTION REBUTTAL, § 552.103.** Mr. Ramirez is not a party, potential party, or claimant in any pending or anticipated litigation by Requestor. The records sought relate to a completed prosecution from 2024–2025 that pre-existed any communication of a potential claim by Requestor. The records are sought for public-accountability journalism, not as a substitute for civil discovery. See Open Records Decision No. 588 (1991) (§ 552.103 protects the agency's litigation posture against the adverse party in pending or anticipated litigation; it does not reach records that would be obtainable by any other member of the public through ordinary TPIA channels). The records sought here are equally subject to disclosure if requested by a journalist, civil-rights organization, or any unrelated citizen; the requestor's identity does not alter their public status.

REDACTION DEFERENCE. I acknowledge that responsive records may contain information the responding entity is required by law to withhold or redact, including victim identifying information under Tex. Code Crim. Proc. arts. 57 and 57A; personally identifying information of officers and employees under Tex. Gov't Code §§ 552.117, 552.130, and 552.147; medical information protected under federal HIPAA and Tex. Gov't Code § 552.101; mental-health records protected under Tex. Health & Safety Code Ch. 611; and other information specifically made confidential by statute. I request that such legally required redactions be applied and the remainder of the records be produced. If any responsive record is withheld in its entirety, I request an itemized index identifying the document, the statutory basis asserted, and a brief description.

PUBLIC-INTEREST FEE WAIVER AND BINDING PUBLIC-RELEASE COMMITMENT. Pursuant to Tex. Gov't Code § 552.267(a), I respectfully request that the responding entity furnish the responsive records without charge or at a reduced rate, on the determination that providing the records is in the public interest because furnishing them primarily benefits the general public. Requestor commits, as a binding condition of this request, that all responsive records produced under this request will be made publicly available at [aiether.info](http://aiether.info) within seven (7) business days of receipt, with mandatory redactions applied. This commitment is binding and independent of any pending or anticipated claim by Requestor in any other forum. Requestor maintains ongoing publication of public information requests, agency responses, and related accountability commentary at the publicly accessible website [aiether.info](http://aiether.info). If full waiver is not granted, I respectfully request the responding entity exercise its discretion under § 552.267(a) to reduce the charge as far as the public interest supports.

AG RULING AND SEVERABILITY. If CCSO seeks an Attorney General ruling under Tex. Gov't Code § 552.301, please provide the required notice and submission within the statutory 10-business-day period and provide me with a copy. If any single item is contested or denied, the remaining items are requested to be produced without delay pending resolution of any AG ruling on the contested item.

COST ESTIMATE. If full or partial waiver is denied, I am willing to pay reasonable charges as authorized by Tex. Gov't Code §§ 552.261–552.275 and the rules of the Office of the Texas Attorney General. Pursuant to § 552.2615, please provide an itemized cost estimate before production if charges are expected to exceed \$40.

Sincerely,

Harold Wayne McKnight