



COMMONWEALTH OF KENTUCKY OFFICE OF THE ATTORNEY GENERAL

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25-ORD-328

October 20, 2025

In re: Christopher West/Blackburn Correctional Complex

Summary: The Blackburn Correctional Complex (“the Complex”) did not violate the Open Records Act (“the Act”), when denied a request for records that do not contain a specific reference to the requesting inmate.

Open Records Decision

Inmate Christopher West (“Appellant”) submitted a request to the Complex for a copy of “[t]he contract between Union Supply and” the Kentucky Centralized Inmate Commissary. The Complex denied the request because the records do not “contain a specific reference to [the Appellant] and [are] exempt from disclosure . . . under KRS 61.878(1)(l) and KRS 197.025(2).” This appeal followed.

Under KRS 197.025(2), the Department of Corrections “shall not be required to comply with a request for any record from any inmate confined in a jail or any facility . . . unless the request is for a record which contains a specific reference to that individual.”¹ The Appellant alleges that the records reference him insofar as they use the terms “offender” or “inmate.” However, the Office has consistently held that the phrase “specific reference to that individual” requires the record to refer to the requesting inmate by name. *See, e.g.,* 23-ORD-347; 17-ORD-073. The Office has found a record does not contain a “specific reference” to a requesting inmate under KRS 197.025(2) simply because it is relevant to, pertains to, or personally affects him. *See, e.g.,* 22-ORD-087; 17-ORD-119; 17-ORD-073. Similarly, a general reference to “offenders” or “inmates” is not a “specific reference” within the meaning of KRS 197.025(2).

¹ KRS 197.025(2) is incorporated into the Act by KRS 61.878(1)(l), which exempts from disclosure “[p]ublic records or information the disclosure of which is prohibited or restricted or otherwise made confidential by enactment of the General Assembly.”

Here, the Complex, initially and on appeal, confirms that the requested records do not contain a “specific reference” to the Appellant. Accordingly, under KRS 197.025(2), the Complex was not required to grant the Appellant’s request and it did not violate the Act by denying the request.

A party aggrieved by this decision may appeal it by initiating an action in the appropriate circuit court under KRS 61.880(5) and KRS 61.882 within 30 days from the date of this decision. Under KRS 61.880(3), the Attorney General shall be notified of any action in circuit court, but shall not be named as a party in that action or in any subsequent proceedings. The Attorney General will accept notice of the complaint emailed to OAGAppeals@ky.gov.

Russell Coleman
Attorney General

/s/ Zachary M. Zimmerer
Zachary M. Zimmerer
Assistant Attorney General

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Distributed to:

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