

## January 5, 2017

Sent via email to townclerk@applevalley.org; fax to 760-961-6241; and first class mail

La Vonda M-Pearson, Town Clerk Town of Apple Valley 14955 Dale Evans Parkway Apple Valley, CA 92307

**Re: Request for Public Records** 

Dear La Vonda M-Pearson:

My office represents Leane Lee in this request for public records submitted pursuant to California Government Code section 6250 *et seq.*, the California Public Records Act (PRA).

This request is for the following public records:

- 1. All invoices and related billing records related to services the Town received from Best Best & Kreiger for all services other than representation in active and pending litigation from January 1, 2015 through present.
- 2. All communication, including emails, letters, faxes, memoranda, and other correspondence, including attachments, between any Town employee or contractor and any principal, employee, or contractor of The 20/20 Network using an email address ending in @the2020network.com from January 1, 2015 through present.
- 3. All communication, including emails, letters, faxes, memoranda, and other correspondence, including attachments, between any Town employee or contractor and Steve Lambert, Partner of The 20/20 Network, using any email address, from January 1, 2015 through present.
- 4. All communication, including emails, letters, faxes, memoranda, and other correspondence, including attachments, between any Town employee or contractor and Tim Gallagher, Partner of The 20/20 Network, using any email address, from January 1, 2015 through present.
- 5. All communication, including emails, letters, faxes, memoranda, and other correspondence, including attachments, between any Town employee or

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contractor and Ben Gallagher, Social Media Director of The 20/20 Network, using any email address, from January 1, 2015 through present.

6. All communication, including emails, letters, faxes, memoranda, and other correspondence, including attachments, between any Town employee or contractor and Deana, Olivares-Lambert, Associate of The 20/20 Network, using any email address, from January 1, 2015 through present.

This is a request for electronic records in their original electronic format. (Gov. Code § 6253.9.) If records are available in both an electronic format and a hard-copy format, please provide only the electronic records. You can email the electronic records to me at chad@chadmorgan.com. For any record that is not available electronically, please provide me with the actual cost of duplicating the records.

Should you withhold responsive records, please justify the withholding of the record in writing with a demonstration as to why the record is exempt from disclosure. (Gov. Code § 6255, subd. (a).) Please also provide the name and title of whoever was responsible for the denial. (Gov. Code § 6253, subd. (d).)

I am looking forward to your determination within 10 days as to whether you possess disclosable public records that are responsive to this request. If you have any questions please contact me by email to <a href="mailto:chad@chadmorgan.com">chad@chadmorgan.com</a> or by calling me at (951) 667-1927.

Sincerely,

Chad D. Morgan, Esq.

Clu Morgan