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Long Beach

July 21, 2022

VIA EMAIL

Concerned Carmel Residents
[REDACTED]

Re: Carmel Unified School District
Response to California Public Records Act Request No. 2223-01
Our file no. 1885.210001

Dear Sir or Madam:

On behalf of our client, Carmel Unified School District ("District"), this letter responds to your recent request, received July 11, 2022, for records under the California Public Records Act ("CPRA"), Gov. Code, § 6250 et seq.

In accordance with California Government Code section 6253.1, the District understands you requested the following six (6) categories of records concerning "fundraising activities from 2014 to 2017 for Carmel High School's Athletic Field":

- CPRA Request Category 1: Records "confirm[ing] the efforts were nicknamed – Operation Padre" and "all correspondence associated with this effort."
- CPRA Request Category 2: Records identifying "the individuals leading all the fundraising efforts."
- CPRA Request Category 3: Records identifying "all the specific individuals, organizations and other entities that donated to the efforts and how much each one specifically contributed" including whether "this [was] tax deductible."
- CPRA Request Category 4: Records containing "the specific breakdowns of how much funding was raised."
- CPRA Request Category 5: Records containing a "breakdown [of] how the contributed funds were spent and how was tracking of the contributions recorded and held accountable."

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Concerned Carmel Residents
July 21, 2022
Page 2

- CPRA Request Category 6: Records that “indicate what were the requirements in the spending efforts.”

This request is overly broad and unduly burdensome. (See *Bertoli v. City of Sebastopol* (2015) 233 Cal.App.4th 353, 371-372.) A request for disclosure of public records under the CPRA must be specific and reasonably focused. (*Rogers v. Superior Court* (1993) 19 Cal.App.4th 469, 480-481.) The reasoning behind this requirement is so that a public agency “will have the opportunity to promptly identify and locate such records and to determine whether any exemption to disclosure applies.” (*Galbiso v. Orosi Pub. Utility Dist.* (2008) 167 Cal.App.4th 1063, 1088.) Without this information, it is impossible for the District to address the full scope of objections that may apply to your request or identify disclosable responsive records.

Accordingly, this letter serves as the District’s good faith attempt pursuant to Government Code section 6253.1 to elicit additional clarifying information from you that will help identify responsive records and assist you in making a focused and effective request that reasonably describes an identifiable record or records. (See Gov. Code, § 6253.1. subd. (a) & (b).) Specifically, with respect to your request for “correspondence”, please specify whose correspondence you are seeking (i.e., names of individuals or position titles), and provide specific and reasonably focused key terms for the District to search.

At your earliest convenience, please provide the clarifications sought above so that the District can fully respond to your CPRA request. With respect to the remainder of your request, to the extent that the District correctly understands the scope of your request, the District has determined that it must extend the time to respond to the request by fourteen (14) days, such that the District will respond by no later than **August 4, 2022**. (See Gov. Code, § 6253, subd. (c).) The circumstances warranting this extension include the need to search for, collect, and appropriately examine a voluminous amount of separate and distinct records in response to your request. (See *id.*)

Upon completion of the District’s search, collection, and examination of records, only those documents that meet the definitions contained in the CPRA and are not otherwise exempt from disclosure will be produced. The District reserves all objections at this time.

Thank you for your patience while the District prepares its response to your CPRA request. In the meantime, if you have any questions, please contact this office.

Sincerely,

DANNIS WOLIVER KELLEY



Reid D. Shannon

cc: Jessica Hull, Director of Communications and Community Relations (Carmel Unified School District)
Tricia Zarevich, Confidential Administrative Assistant to the Superintendent (Carmel Unified School District)
Jessika K. Johnson, Esq. (Dannis Woliver Kelley)