

John Allison
P. O. Box 1205
Fort Bragg, CA 95437

March 14, 2022
(Sent by email)

Ms. Amy McColley
Board Chair
Mendocino Coast Healthcare District
Fort Bragg, CA 95437

Ms. Sara Spring
Board Member and Secretary
Mendocino Coast Healthcare District
Fort Bragg, CA 95437

Re: Supplemental Public Records Request

Dear Ms. McColley and Ms. Spring:

I am sending you this supplemental public records request pursuant to sections 6250 through 6270 of the California Government Code, as a voter and taxpayer residing within the Mendocino Coast Healthcare District. This request is submitted by me on my own behalf and not on behalf of any organization.

Definitions

The following definitions apply to this public records request:

“Healthcare District” means the Mendocino Coast Healthcare District.

“Amy McColley” means Healthcare District Board of Directors member Amy McColley.

“Sara Spring” means Healthcare District Board of Directors member Sara Spring.

“Jacob Patterson” means Jacob R. Patterson, a lawyer in Fort Bragg, California.

“Documents” means writings as defined in California Government Code section 6252(g) that constitute public records as defined in California

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Government Code section 6252(e) and that were created at any time on or after December 1, 2021.

“Documents” include, without limitation, letters, memoranda, drafts, written notes, minutes, agendas, emails and any other form of electronic communication including social media posts.

“February 28 Public Records Request” means the public records request I submitted to the Mendocino Coast Healthcare District on February 28, 2022 by letter emailed to Amy McColley as Healthcare District Board Chair and Sara Spring as Healthcare District Board Secretary with copies to the other members of the Healthcare District Board of Directors.

“Work on the Healthcare District’s Response to the February 28 Public Records Request” means any act performed in connection with the Healthcare District’s response to the February 28 Public Records Request including, without limitation, the collection of documents, the review of documents, the determination of whether documents are responsive, the determination of whether documents are exempt from public disclosure under the California Public Records Act, and the preparation of any letter or other document relating to the February 28 Public Records Request.

Requests for Public Records

I hereby request that the public records listed below be made available for inspection by me at the offices of the Mendocino Coast Healthcare District in Fort Bragg, California. The records should be made available for inspection promptly as they are located and assembled. A “rolling production” of documents as they become available will be acceptable so long as all of the requested documents are produced on or before April 30, 2022. I reserve the right to request copies of some or all of the documents that are produced. The public records subject to this request are:

1. All Documents that mention or pertain to the retention of legal counsel to assist the Healthcare District in responding to the February 28 Public Records Request.
2. All drafts of the Healthcare District’s March 10, 2022 determination letter signed by Sara Spring in response to the February 28 Public Records Request.

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3. All Documents that mention or pertain to Amy McColley's Work on the Healthcare District's Response to the February 28 Public Records Request.
4. All Documents that mention or pertain to Sara Spring's Work on the Healthcare District's Response to the February 28 Public Records Request.
5. All Documents that mention or pertain to Jacob Patterson's Work on the Healthcare District's Response to the February 28 Public Records Request.
6. All Documents that establish the creation of an attorney-client relationship between Jacob Patterson and the Healthcare District. If no Documents responsive to this request can be found, please so state.
7. All Documents that mention or pertain to the existence of an attorney-client relationship between Jacob Patterson and any member of the Board of Directors of the Healthcare District.

Please let me know if you have any questions.

Sincerely,



John Allison