

S. Cabrera Open forum
BOS 5/15/2014

May 15, 2018

Joe Harn
Auditor Controller
County of El Dorado

RE: Public Records Act Request

Dear Mr. Harn,

Pursuant to the California Public Records Act (Government Code Section 6250 et seq.), I ask to obtain the following documents (see attached), which I understand to be held or accessible by your office.

I ask for a determination on this request within 10 days of your receipt of it, and an even prompter reply if you can make that determination without having to review the record(s) in question.

If you determine that any or all of the information qualifies for an exemption from disclosure, I ask you to note whether, as is normally the case under the Act, the exemption is discretionary, and if so whether it is necessary in this case to exercise your discretion to withhold the information. Also, please be aware that I will seek legal remedies from the Superior Court if my request for this information is blocked as the benefits to the public's best interest outweighs any right to privacy.

If you determine that some but not all of the information is exempt from disclosure and that you intend to withhold it, I ask that you redact it for the time being and make the rest available as requested.

Additionally, please provide a signed notification citing the legal authorities on which you rely if you determine that any or all of the information is exempt and will not be disclosed.

If I can provide any clarification that will help expedite your attention to my request, please contact me at Sophie.cabrera22@yahoo.com or at (916) 215-1771.

I am sending a copy to County Counsel to help encourage a speedy determination, and I would likewise be happy to discuss my request with him at any time.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sophie Cabrera". The signature is fluid and cursive, with the first name being more prominent.

Sophie Cabrera, Retired

(916) 215-1771

Public Records Act Request

- 1. A list of all disbursements made by the El Dorado County third party administrator George Hills and/or George Hills Company and/or George Hills Company, Inc. of Rancho Cordova, CA, which includes the parties to whom the disbursements were made from the period of January 1, 2012 to the date of this request.**

J. Baer Open Forum BOS 5/18/2018

JOSEPH R. BAER, ESQ

**6621 Starkes Grade Road
Pollock Pines, CA. 95726
(530) 644-3011
Facsimile: (530) 644-3011**

April 30, 2018

(Sent via regular mail, E-Mail and facsimile transmission)

Roger Runkle
Deputy County Counsel
El Dorado County Counsel
330 Fair Lane
Placerville, CA 95667
Facsimile: (530) 621-2937

RE: Public Records Act Request Received March 15, 2018- P001608-031518

Dear Mr. Runkle:

This letter follows my March 31, 2018 and April 10, 2018 letters to you, and several follow-up e-mails. The County has failed and refused to respond to my last letter or any of my follow-up requests for information, cooperation or suggestions.

It appears that the County's conduct in ignoring my communications is an intentional violation of Government Code § 6250 et. seq. To the extent that there is some legitimate excuse for the County's non-compliance, non-cooperation, and refusal to meaningfully communicate, please notify me accordingly, within 24 hours.

Otherwise, the County appears to be withholding documentation for improper purposes, to the detriment of the residents and voters of the County of El Dorado.

Pursuant to Government Code § 6250

"...(b) Except with respect to public records exempt from disclosure by express provisions of law, each state or local agency, upon a request for a copy of records that reasonably describes an identifiable record or records, shall make the records **promptly** available to any person upon payment of fees covering direct costs of duplication, or a statutory fee if applicable. Upon request, an exact copy shall be provided unless impracticable to do so.

(c) Each agency, upon a request for a copy of records, shall, **within 10 days** from receipt of the request, determine whether the request, in whole or in part, seeks copies of disclosable public records in the possession of the agency and shall

promptly notify the person making the request of the determination and the reasons therefor. In unusual circumstances, the time limit prescribed in this section may be extended by written notice by the head of the agency or his or her designee to the person making the request, setting forth the reasons for the extension and the date on which a determination is expected to be dispatched. **No notice shall specify a date that would result in an extension for more than 14 days.** When the agency dispatches the determination, and if the agency determines that the request seeks disclosable public records, the agency shall state the estimated date and time when the records will be made available....

(d) Nothing in this chapter shall be construed to permit an agency to delay or obstruct the inspection or copying of public records. The notification of denial of any request for records required by Section 6255 shall set forth the names and titles or positions of each person responsible for the denial.

(e) Except as otherwise prohibited by law, a state or local agency may adopt requirements for itself that allow for faster, more efficient, or greater access to records than prescribed by the minimum standards set forth in this chapter....”
(Emphasis added)

The County has satisfied the first technical time requirement through its March 26, 2018 initial response letter, in which it essentially indicates that the County would be postponing its substantive response by the additional 14 day maximum.

The April 9, 2018 letter, although sent within that 14 day window, violates the code in several other respects, both in “letter and spirit” In the letter, the County essentially indicates that **it will not produce any records or requested information in a timely manner.**

In the April 9, 2018 letter you invite my cooperation in streamlining the process and record request. I immediately responded with legitimate suggestions, and with requests for information so appropriate clarifications and modifications could be effectuated. I asked that records already located be produced, while the remaining efforts are completed.

The County has failed to respond at all, supporting a concern that there was no legitimate interest in working out accommodations to allow the completion of the production in a timely, efficient manner, or at all.

As indicated in my letters, the records I am seeking have been requested from the County many times before, by other residents. Each time those requests were thwarted by the County, through various means.

If the County is truly interested in cooperating to complete the production, I look forward to receiving the County's substantive response to my recent letters by the end of this week, setting forth the County's suggestions and recommendations for streamlining, narrowing or otherwise modifying the nature and scope of the requests.

The claim that it will take 90 days to respond to the request is completely unmerited and unreasonable. Larger, more complex record requests, addressed to entities much larger than El Dorado County are routinely completed within 30 to 60 days in most lawsuits. In my view, this record request could have been completed by now if the appropriate efforts were taken.

Again, I am more than willing to cooperate with the County. The County, on the other hand does not appear to be interested in cooperating with me, for reasons postulated below.

In order to help expedite the release of some of the critical information, and given the County's refusal to respond to my last letter, I have set forth at the end of this letter a limited request for information that is readily available to the County and should be able to be provided this week. Please let me know if the County will accept and comply with my request to immediately provide this simple but critically necessary information to the upcoming election.

Pursuant to Government Code § 6250

"A state or local agency may not allow another party to control the disclosure of information that is otherwise subject to disclosure pursuant to this chapter."

The present conduct, given the long history of such record requests involving Mr. Harn, seems to indicate that the County is allowing Mr. Harn and/or his supporters to control the record production, for the improper purpose of preventing harmful information about Mr. Harn from being properly and timely disclosed to the public; to aide in his re-election efforts.

For instance, Mr. Harn makes claims in his campaign that he was cleared by the California Attorney General of any misconduct found by the El Dorado Grand Jury. This statement is appears to be patently false, as will be established by the County records currently being sought. The County's conduct in withholding the records and information will thus allow the perpetration of a fraud on the voters of the County.

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Pursuant to Government Code § 6255

“(a) The agency shall justify withholding any record by demonstrating that the record in question is exempt under express provisions of this chapter or that on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.

(b) A response to a written request for inspection or copies of public records that includes a determination that the request is denied, in whole or in part, shall be in writing.”

The County is in violation of this section as well. No substantive response has been provided at all, and it appears as if the County will not provide a response until **after** the upcoming elections, if ever; all to aid Mr. Harn in his election campaign.

The County has been notified, in no uncertain terms, that the records are being sought to help educate voters in the upcoming election about Mr. Harn’s past misconduct, and the tremendous amount of taxpayer money that misconduct has cost the taxpayers of El Dorado County. My conservative estimate is that his misconduct has cost in excess of **two million dollars**, taking into consideration, investigative costs, studies, Grand Jury expenses, litigation expenses, increased liability insurance premiums, costs, attorney’s fees, as well as the settlement and judgment payouts.

Clearly, disclosing the information to the voters of the County a sufficient amount of time before the election is in the public’s interest. Clearly, this important public need justifies prompt and meaningful action by the County; as opposed to continuing obstructive delay tactics designed to protect an ingrained, incumbent official.

Even if the reason was not of such importance, delaying the production for any reason is in violation of the law. Under Government Code § 6257.5 “This chapter does not allow limitations on access to a public record based upon the purpose for which the record is being requested, if the record is otherwise subject to disclosure.”

Given this background, I am again demanding full and complete compliance with my March 15, 2018 Public Record Request in a prompt and timely manner so the information can be disseminated a sufficient time before the upcoming election.

Again, I am more than willing to cooperate with the County so that it can provide me with the requested information and documentation, as timely and

efficiently as possible. In order to do so, I need some basic information and suggestions from the County including information about what documents, records, and/or data are generated, obtained and maintained; how they are stored and maintained; how long they are maintained; and what information and data is contained in available computer data bases. It is entirely foreseeable that most of the necessary information I am requesting can simply be printed out from available computer databases in a matter of hours.

Further, many of the requests may be self-limiting given the County's generation, storage, retention and document destruction policies. I am not privy to any of this information. It is readily available to the County. The County should already have communicated the relevant information to me so that we could have resolved the pending "log jam" weeks ago.

In addition, as I requested on April 10, 2018, please provide me with the County's suggestions on how it proposes narrowing the production so that I can obtain the information/documentation in as timely a manner as possible so it can be disseminated to the voters of El Dorado County a sufficient amount of time before the upcoming elections, so the voters can make intelligent and informed decisions.

This is a fairly simple request. The County's refusal to acknowledge it, let alone respond to it, is inexcusable.

Absent an appropriate response and true cooperation by the County, I am left with no choice but to seek legal redress pursuant to Government Code § 6259. Pursuant to subsection (d) if I am forced to do so, I will be entitled to recover court costs and reasonable attorney fees.

It is my sincere hope that the County will reconsider its current course so that we are not forced to waste more taxpayer money on an improper effort to protect an incumbent elected official from disclosure of decades of misconduct. This would be on top of the substantial amount of taxpayer money already wasted because of that very misconduct.

Please respond immediately so we can work out a mutually acceptable accommodation and move forward this week.

Thank you again for your anticipated assistance on this matter.

Very Truly Yours,

Joseph R. Baer

Suggested limitations to effectuate immediate disclosure of critical information:

Please provide me with an official letter from the County signed by the appropriate knowledgeable County official setting forth: (1) the name of each claimant and/or plaintiff who has made a claim and/or filed an action or lawsuit against Joe Harn, and/or against El Dorado County because of Joe Harn's past conduct; (2) the year each claim/action or lawsuit was made and/or each action or lawsuit was filed; (3) a brief but accurate account of the allegations made in each claim, action or lawsuit;(4) information about how much valuable consideration was given, paid or exchanged with the claimant/Plaintiff, to resolve each claim, action or lawsuit, including the value of any severance packages provided; (5) when the valuable consideration was given, paid or exchanged; and (6) and the total amounts of all costs of investigation, litigation and handling of each claim, action or lawsuit, to date.

Cc:

Jim Mitrisin,
Clerk of the El Dorado County Board of Supervisors
360 Fair Lane
Placerville, CA 95667
Facsimile: (530) 622-3645

Michael Ranalli, Chairman, El Dorado County Board of Supervisors
360 Fair Lane
Placerville, CA 95667
Facsimile: (530) 622-3645

JOSEPH R. BAER, ESQ

**6621 Starkes Grade Road
Pollock Pines, CA. 95726
(530) 644-3011
Facsimile: (530) 644-3011**

April 10, 2018

(Sent via regular mail, E-Mail and facsimile transmission)

Roger Runkle
Deputy County Counsel
El Dorado County Counsel
330 Fair Lane
Placerville, CA 95667
Facsimile: (530) 621-2937

RE: Public Records Act Request Received March 15, 2018

Dear Mr. Runkle:

Thank you for your latest e-mail response to my Record Request.

I am not intimately familiar with all the records, documents and reports the County generates and maintains; how they are organized and stored; and what data is available in its available data bases. I tried to find out as much as I could to sculpt my requests to make compliance as efficient for the County as possible.

I realize that many of my requests are "overlapping". That is due to information I have received from others who have attempted to obtain similar or other related information through past and/or pending requests, and found that the County parsed words and/or viewed the language of requests in a hyper-technical, artificially narrow, manner way resulting in a claim that no records exist, when there clearly do exist.

In addition, although my initial efforts began with only the first names of the various County employees who made claims or pursued actions against the County as a result of Mr. Harn's conduct, I spend a great deal of time trying to locate the last names, so I could provide those last names, spelled as accurately as possible, of as many of those employees as my investigation time permitted. Since time is of the essence, I had to send the Record Request before I could conduct further research to locate and speak to all the employees and ex-employees who had problems with Mr. Harn, I could locate. Further with each contact I learned about others who needed to be added to the ever expanding list of people who have had problems with Mr. Harn, including members of the Board of Supervisors.

I believe that you and/or the County can easily locate information about those claims, lawsuits, workers compensation claims etc. using the information I provided. One case, the case of Ms. Webb, is currently being litigated.

I have also tried to restrict the language of my requests to avoid claims of privilege, as I have seen asserted in response to past requests for similar information.

I only have the one report of a Grand Jury, the 2014/2015 Grand Jury Report. I understand that there have been several Grand Jury Investigations involving Mr. Harn. I would like all the information, documentation and reports available to the County for all Grand Jury investigations into Mr. Harn. Again, I do not have full information about what the County obtains from the Grand Jury, provides to the Grand Jury, or maintains. Thus, my requests were designed to obtain all available, unprivileged documents and information.

With all this said, I am more than willing to cooperate with you and the County so that you can provide me all the requested information and documentation, as timely and efficiently as possible. For instance, I do not want you to have to duplicate efforts or provide duplicate documents or information that may be in different County departments or data bases.

Thus, I suggest, since you and the County know better than I, is that you and/or the County give me information on what is generated; obtained and maintained; how it is stored; how long it is maintained; and what is contained in the available data bases. Please also provide your and/or the County's suggestions on how you would suggest narrowing the production so that I can obtain the information/documentation in as timely a manner as possible so it can be disseminated to the voters of El Dorado County a sufficient amount of time before the upcoming elections so the voters can make intelligent and informed decisions.

Please let me know what you and the County suggests as quickly as possible, **and begin the process of completing your suggestions in an immediate fashion.** I will review your suggestions and let you know of any additional suggestions I may have so that important information and documentation is not overlooked in the County's search.

I have generally learned about the broad scope of complaints leveled against Mr. Harn by County employees, as well as outsiders during his extremely long tenure in office as auditor/controller; the large number of complaints, lawsuits and actions brought against the County because of his conduct; the significant expenses the County/its insurers/adjusters/attorneys have incurred in investigating complaints, defending claims and defending lawsuits arising from his conduct; the significant

expenses the County has incurred in dealing with the Grand Jury and Attorney General investigations into his conduct; the significant expenses the County has incurred in settling claims and lawsuits arising from his conduct; the significant expenses the County has incurred in paying severance packages to employees who had to leave the County due to his conduct; and the human cost to the County of losing so many qualified personal people who quit or had to go out on disability leave due to his conduct and behavior.

I need as much of the full and accurate information on these issues as possible so it can be accurately provided to voters of this County.

I believe this will be of benefit to the voters of El Dorado County, the taxpayers of El Dorado County who have paid for all these unnecessary costs and expenses, and the personal of the County, and outside public agencies and contractors, who still have to deal with Mr. Harn.

I look forward to working with you and the County to accomplish this goal in as efficient and expeditious a manner as possible. Please let me know what and how you suggest going forward. Please immediately begin completing your initial suggested course of action to avoid unnecessary delays.

Thank you again for your assistance on this matter.

Very Truly Yours,

Joseph R. Baer

Cc:

Jim Mitrisin,
Clerk of the El Dorado County Board of Supervisors
360 Fair Lane
Placerville, CA 95667
Facsimile: (530) 622-3645

Michael Ranalli, Chairman, El Dorado County Board of Supervisors
360 Fair Lane
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JOSEPH R. BAER, ESQ

**6621 Starkes Grade Road
Pollock Pines, CA. 95726
(530) 644-3011
Facsimile: (530) 644-3011**

March 31, 2018

(Sent via regular mail and facsimile transmission)

Roger Runkle
Deputy County Counsel
El Dorado County Counsel
330 Fair Lane
Placerville, CA 95667
Facsimile: (530) 621-2937

RE: Public Records Act Request Received March 15, 2018

Dear Mr. Runkle:

I am in receipt of your March 26, 2018 letter, postmarked March 27, 2018, and thank you for same. First off, congratulations on your new position with the County Counsel's Office.

Your notice that the County is extending the response time for my record request, to a date on or before April 9, 2018, is hereby acknowledged.

Please make all efforts to comply with the requests and produce all the requested information/documentation/data on or before April 9, 2018. It is my understanding that most of the information/ documentation/data has been requested **many times** by citizens of El Dorado County, several Grand Jury's, and the California Attorney General's Office, to list a few.

Thus far, the information/documentation/ data has been withheld (in whole or in substantial part) from the citizens of El Dorado County. As a result, the citizens of this County have not had the opportunity to learn about the significant facts, events, complaints, lawsuits, Grand Jury investigations, Attorney General investigations, and/or the proven, or repeatedly alleged, misconduct of an elected official, Joe Harn.

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As stated in the 2014/2015 Grand Jury Report:

The Grand Jury heard the same allegations repeated from credible witnesses in a number of different complaints:

- The Auditor/Controller Joe Harn creates problems, blames others for those problems and then leaks information about the problems and a scapegoat to the press.**
- The Auditor/Controller Joe Harn refuses to cooperate with the Chief Administrative Officer or staff to fix problems.**
- The Auditor/Controller Joe Harn is a bully and targets individuals or departments for harassment.**

The Grand Jury found all of these allegations to be substantiated."(El Dorado County Grand Jury 2014-2015 Putting Political Gain Above What's Right For the County Case GJ-14-12)

Although you are new to the County Counsel's office, you are a long time resident of the County. I am sure you are aware of some of the issues. I have communicated with many employees and ex-employees of El Dorado County, at all levels, and have been consistently told that the problems with Mr. Harn, which have been going on for over 25 years, are well known to the County, including members of the Board of Supervisors, and the present and past County Counsel.

It is very disappointing that the magnitude of the problems have been kept from the citizens of the County for so long. As a result, the problems have been allowed to continue. In fact, it appears to me that the County may have actually enabled the misconduct to continue, at a substantial cost to the County by way of investigative costs, attorney fees and payouts/settlements to victims.

All the information requested is critically necessary for voters in this County to know **before** they cast their ballots in this year's elections. If the County delays again, or withholds critical information, it will likely result in Mr. Harn being elected again (to one of the only few elected offices that does not have a term limit), subjecting the County to another 4 years of his misconduct, aberrant behavior, inefficiency, workplace hostility, and the substantial waste of taxpayer money.

I have been informed by a person who was present that when Mr. Harn first took office he held a staff meeting in which he stated: **I am going to run this County like an emperor running his empire, because that is what I am.** It appears clear from what I have learned that he has consistently acted as an emperor who is above the law, above proper County practices and procedures, and beyond restraint. Sitting members of the Board of Supervisors have made similar comments in open session.

The County is in litigation, as we speak, as a result of his conduct. Further, the County has spent a tremendous amount of taxpayer money on such things as studying the hostile work environment Mr. Harn created and/or contributed to; and in implementing the recommendations of the law firm that performed the most recent extensive study, i.e. The Cultural Assessment Survey completed by VanDermyden Maddus Law firm in 2014.

The money paid or allotted to just these two items was \$390,000.00 (Three Hundred and Ninety Thousand Dollars), i.e. \$140,000.00 for the cost of the survey, and \$250,000.00 allocated to implement the recommendations.

Thus, given this long history and the multiple requests for the information/documentation/data by citizens, Grand Juries and governmental agencies; and given the critical importance of this information to El Dorado County Voters **before** the upcoming elections, please take all necessary action to provide the information/documentation/data **in the immediate future.**

I am heartened that an attorney of your caliber and reputation for honesty and integrity is handling the request. If I can be of any assistance in helping you streamline or expedite the process, please feel free to let me know.

I already spent a great deal of time trying to locate the full names of known victims to make the record search easier. If you run into a problem identifying a particular person where I have only been able to provide a first name, please let me know and I will attempt to locate the currently unknown last names.

Thank you for your time and attention to this matter.

Very Truly Yours,

Joseph R. Baer

Cc:

Jim Mitrisin,
Clerk of the El Dorado County Board of Supervisors
360 Fair Lane
Placerville, CA 95667
Facsimile: (530) 622-3645

Michael Ranalli, Chairman, El Dorado County Board of Supervisors
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JOSEPH R. BAER, ESQ

**6621 Starkes Grade Road
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(530) 644-3011
Facsimile: (530) 644-3011**

March 15, 2018

(Sent via regular mail and facsimile transmission)

Michael Ciccozzi
El Dorado County Counsel
330 Fair Lane
Placerville, CA 95667
Facsimile: (530) 621-2937

RE: Public Records Act Request

Dear Mr. Ciccozzi,

Pursuant to my rights under the California Public Records Act (Government Code Section 6250 et seq.), I ask to obtain the following documents (see attached), which I understand to be held or accessible by your agency.

I ask for a determination on this request within 10 days of your receipt of it, and an even more prompt reply if you can make that determination without having to review the record(s) in question.

I would not ordinarily trouble you with this written request, but when an informal request was made it was represented by your agency that the records did not exist. I believe this claim to be inaccurate. Refusing to disclose and provide public records is contrary to the requirements of the California Public Records Act.

Furthermore, as I am sure you are aware, withholding public records, claiming they do not exist when they do, and/or failing to provide requested information and documentation relevant to a publically elected official, for the purpose of protecting that official may constitute wrongdoing.

If you determine that any or all of the information qualifies for an exemption from disclosure, I ask you to note whether, as is normally the case under the Act, the exemption is discretionary, and if so whether it is necessary in this case to exercise your discretion to withhold the information. Also, please be aware that I intend to seek legal remedies from the Superior Court if my request for this

information is blocked as the benefits to the public's best interest outweighs any right to privacy.

If you determine that some but not all of the information is exempt from disclosure and that you intend to withhold it, I ask that you redact it for the time being and make the rest available as requested.

Additionally, please provide a signed notification citing the legal precedent on which you intend to rely, if you determine that any or all of the information is exempt and will not be disclosed. If the requested information does not in fact exist, please provide a signed document stating that fact.

If I can provide any clarification that will help expedite your attention to my request, please contact me in writing, via facsimile, at (530) 644-3011. I ask that you notify me of any duplication costs exceeding \$500 before you duplicate the record so that I may decide which records I want copied.

I am sending a copy to the Clerk of the Board and to the Board Chair to help encourage a speedy determination, and I would likewise be happy to discuss my request with either of them at any time.

Thank you for your time and attention to this matter.

Very Truly Yours,

Joseph R. Baer

Cc:

Jim Mitrisin, Clerk of the El Dorado County Board of Supervisors
360 Fair Lane
Placerville, CA 95667
Facsimile: (530) 622-3645

Michael Ranalli, Chairman, El Dorado County Board of Supervisors
360 Fair Lane
Placerville, CA 95667
Facsimile: (530) 622-3645

Public Records Act Request

1. True and correct copies of any and all documents that contain information about workplace/employment related allegations made against Joe Harn (El

Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the below specified **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter, which involved employees/ex-employees of El Dorado County including, but not limited to, KELLY OR KELLIE WEBB; BONNIE RICH; RENEE OR RENAE MARTINELLI; CATHY OR KATHY SARGENT; KEELIE OR KEELEY GONZALES; SALLY OR SALLIE ZUTTER; MELANIE OR MELONY DAPER; DEBBIE BARFIELD; KITTY MILLER; MICHAEL APPLGARTH; CATHY OR KATHY LEVICKI; MARY SMITH; CAROL LEWIS; KIRK SMITH; TERRY DALY; AND JANET CARLEY. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings, which information is readily available to El Dorado County.

(**SUBJECT CONDUCT** refers to claims made that Joe Harn engaged in conduct in the workplace including: retaliation; discrimination; age discrimination; sex discrimination; harassment; sexual harassment; humiliation; mental abuse; emotional abuse; physical abuse; disparate treatment of others based on their sex or sexual orientation; behavior that created a hostile workplace environment; retaliation against whistleblower(s); retaliation against person(s) who made allegations, complaints, or claims against him; intimidation; improper demotion; wrongful termination; constructive termination; improper layoff; improper termination within probationary periods; mistreatment of department residents; work place bullying; improper yelling; improper belittling of employees; and/or requesting that employees engage in misconduct on his behalf including but not limited to assisting him in obtaining negative information about others to be used against them and/or engaging in retaliatory action against others.)

2. True and correct copies of any and all documents that contain information about workplace/employment related complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter, which involved employees/ex-employees of El Dorado County including, but not limited to, KELLY OR KELLIE WEBB; BONNIE RICH; RENEE OR RENAE MARTINELLI; CATHY OR KATHY SARGENT; KEELIE OR KEELEY GONZALES; SALLY OR SALLIE ZUTTER; MELANIE OR MELONY DAPER; DEBBIE

BARFIELD; KITTY MILLER; MICHAEL APPLGARTH; CATHY OR KATHY LEVICKI; MARY SMITH; CAROL LEWIS; KIRK SMITH; TERRY DALY; AND JANET CARLEY. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings, which information is readily available to El Dorado County.

3. True and correct copies of any and all documents that contain information about workplace related/employment claims made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter, which involved employees/ex-employees of El Dorado County including, but not limited to, KELLY OR KELLIE WEBB; BONNIE RICH; RENEE OR RENAE MARTINELLI; CATHY OR KATHY SARGENT; KEELIE OR KEELEY GONZALES; SALLY OR SALLIE ZUTTER; MELANIE OR MELONY DAPER; DEBBIE BARFIELD; KITTY MILLER; MICHAEL APPLGARTH; CATHY OR KATHY LEVICKI; MARY SMITH; CAROL LEWIS; KIRK SMITH; TERRY DALY; AND JANET CARLEY. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings, which information is readily available to El Dorado County.

4. True and correct copies of any and all reports that contain information about workplace/employment related allegations made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the below specified **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter, which involved employees/ex-employees of El Dorado County including, but not limited to, KELLY OR KELLIE WEBB; BONNIE RICH; RENEE OR RENAE MARTINELLI; CATHY OR KATHY SARGENT; KEELIE OR KEELEY GONZALES; SALLY OR SALLIE ZUTTER; MELANIE OR MELONY DAPER; DEBBIE BARFIELD; KITTY MILLER; MICHAEL APPLGARTH; CATHY OR KATHY LEVICKI; MARY SMITH; CAROL LEWIS; KIRK SMITH; TERRY DALY; AND JANET CARLEY. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings, which information is readily available to El Dorado County.

5. True and correct copies of any and all documents that contain information about workplace related/employment allegations made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter, which involved employees/ex-employees of El Dorado County including, but not limited to, employees/past employees with the first names of Bonnie, Renee, Renae, Kathy, Cathy, Tina, Kathy, Kellie, Kelly, Keelie, Keeley, Sally, Sallie, Melanie, and/or Debbie. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings and last names which information is readily available to El Dorado County.
6. True and correct copies of any and all documents that contain information about workplace related/employment claims made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter, which involved employees/ex-employees of El Dorado County including, but not limited to, employees/past employees with the first names of Bonnie, Renee, Renae, Kathy, Cathy, Tina, Kathy, Kellie, Kelly, Keelie, Keeley, Sally, Sallie, Melanie, and/or Debbie. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings and last names which information is readily available to El Dorado County.
7. True and correct copies of any and all documents that contain information about workplace related/employment complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter, which involved employees/ex-employees of El Dorado County including, but not limited to, employees/past employees with the first names of Bonnie, Renee, Renae, Kathy, Cathy, Tina, Kathy, Kellie, Kelly, Keelie, Keeley, Sally, Sallie, Melanie, and/or Debbie. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings and last names which information is readily available to El Dorado County.
8. True and correct copies of any and all reports that contain information about workplace related/employment allegations made against Joe Harn (El

Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter, which involved employees/ex-employees of El Dorado County including, but not limited to, employees/past employees with the first names of Bonnie, Renee, Renae, Kathy, Cathy, Tina, Kathy, Kellie, Kelly, Keelie, Keeley, Sally, Sallie, Melanie, and/or Debbie. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings and last names which information is readily available to El Dorado County.

9. True and correct copies of any and all documents that contain information about allegations made against Joe Harn (El Dorado County Auditor – Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT TOWARD OTHER AGENCIES AND ENTITIES** made during the time period of January 1, 2010 through the date of this letter, which involved Agencies and entities including but not limited to Fire Protection Districts, including but not limited to the Garden Valley Fire Protection District (and specifically including, but not limited to, RICHARD SMITH and MARK SPAWN who offered public testimony at the May 13, 2014 meeting of the El Dorado County Board of Supervisors)

(SUBJECT CONDUCT TOWARD OTHER AGENCIES AND ENTITIES refers to claims made that Joe Harn engaged in conduct including: retaliation; discrimination; delaying payment; not making requested payments; delaying processing of invoices; delaying payment of invoices; harassment; retaliation against person(s) who made complaints or claims against him; mistreatment of others; bullying; improper yelling; improper belittling of others; and/or requesting that others engage in misconduct on his behalf including but not limited to assisting him in obtaining negative information about others to be used against them and/or engaging in retaliatory action against others.)

10. True and correct copies of any and all documents that contain information about claims made against Joe Harn (El Dorado County Auditor – Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT TOWARD OTHER AGENCIES AND ENTITIES** made during the time period of January 1, 2010 through the date of this letter, which involved Agencies and entities including but not limited to Fire Protection Districts, including but not

limited to the Garden Valley Fire Protection District (and specifically including, but not limited to, RICHARD SMITH and MARK SPAWN who offered public testimony at the May 13, 2014 meeting of the El Dorado County Board of Supervisors)

11. True and correct copies of any and all documents that contain information about complaints made against Joe Harn (El Dorado County Auditor – Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT TOWARD OTHER AGENCIES AND ENTITIES** made during the time period of January 1, 2010 through the date of this letter, which involved Agencies and entities including but not limited to Fire Protection Districts, including but not limited to the Garden Valley Fire Protection District (and specifically including, but not limited to, RICHARD SMITH and MARK SPAWN who offered public testimony at the May 13, 2014 meeting of the El Dorado County Board of Supervisors)
12. True and correct copies of any and all reports that contain information about allegations made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT TOWARD OTHER AGENCIES AND ENTITIES** made during the time period of January 1, 2010 through the date of this letter, which involved Agencies and entities including but not limited to Fire Protection Districts, including but not limited to the Garden Valley Fire Protection District (and specifically including, but not limited to, RICHARD SMITH and MARK SPAWN who offered public testimony at the May 13, 2014 meeting of the El Dorado County Board of Supervisors)
13. True and correct copies of any and all lawsuit complaints (filed in State Court, Federal Court and/or with administrative agencies) made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** filed during the time period of January 1, 2000 through the date of this letter, including but not limited to the case filed by Kelly Webb which is currently pending.
14. True and correct copies of any and all workers compensation claims and complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** filed during the time period of

January 1, 2000 through the date of this letter, including but not limited to the case filed by Kelly Webb which is currently pending.

15. True and correct copies of any and all lawsuit complaints (filed in State Court, Federal Court and/or with administrative agencies) made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT TOWARD OTHER AGENCIES AND ENTITIES** filed during the time period of January 1, 2000 through the date of this letter.
16. True and correct copies of any and all documents that contain information about workplace related/employment allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made by LaRay Brown.
17. True and correct copies of any and all settlement agreements and/or releases entered into with LaRay Brown pertaining to her agreement to leave her employment with El Dorado County as a result of the allegations, claims and complaints she made against Joe Harn.
18. True and correct copies of any and all checks, drafts and/or payment records for payments made to or on behalf of LaRay Brown as part of her settlement of her allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT**, including but not limited to such documents establishing payment to her for one year of salary after she stopped working for the County of El Dorado.
19. True and correct copies of any and all checks, drafts and/or payment records for payments made to or on behalf of any employee or ex-employee of El Dorado County during the time period of January 1, 2000 to the present as part of their settlements, severance packages, or agreements entered into to resolve their allegations, claims complaints, lawsuits, and/or workers compensation actions made against Joe Harn (El Dorado County Auditor – Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT**.
20. True and correct copies of any and all checks, drafts and/or payment records for payments made to or on behalf of any public official of El Dorado

County during the time period of January 1, 2000 to the present as part of their settlements, severance packages, or agreements entered into to resolve their allegations, claims complaints, lawsuits, and/or workers compensation actions made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT**.

21. True and correct copies of any and all checks, drafts and/or payment records for payments made to or on behalf of any elected public official of El Dorado County during the time period of January 1, 2000 to the present as part of their settlements, severance packages, or agreements entered into to resolve their allegations, claims complaints, lawsuits, and/or workers compensation actions made against Joe Harn (El Dorado County Auditor – Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT**.

22. True and correct copies of any and all checks, drafts and/or payment records for payments made to or on behalf of any individual or entity (excepting employees, ex-employees, public officials and/or elected public officials) during the time period of January 1, 2000 to the present as part of their settlements, severance packages, or agreements entered into to resolve their allegations, claims complaints, lawsuits, and/or workers compensation actions made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT**.

23. True and correct copies of any and all checks, drafts and/or payment records for payments made to any individual or entity (including but not limited to investors, claim adjusting companies, law firms, and/or attorneys) during the time period of January 1, 2000 to the present related to activities undertaken to investigate, litigate, resolve, satisfy judgments and/or court orders, and/or settle allegations, claims complaints, lawsuits, and/or workers compensation actions made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT**.

24. True and correct copies of any and all checks, drafts and/or payment records for payments made by the County of El Dorado pursuant to its self-insured retention on any and all insurance policies to any individual or entity during the time period of January 1, 2000 to the present related to activities undertaken to investigate, litigate, resolve, satisfy judgments and/or court

orders, and/or settle allegations, claims complaints, lawsuits, and/or workers compensation actions made against Joe Harn (El Dorado County Auditor – Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT**.

25. True and correct copies of any and all documents referencing, documenting, and/or pertaining to increases in the cost of insurance policies to insure the County of El Dorado during the time period of January 1, 2000 to the present related to actual or proposed increases due, in whole or in part, to allegations, claims, complaints, lawsuits, and/or workers compensation actions made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT**.
26. A True and correct copies of the Cultural Assessment survey/report, as well as all summaries of the survey/report, for the cultural assessment survey completed by VanDermyden Maddus Law firm as referenced and discussed in the El Dorado Board of Supervisors meeting held on April 28, 2014 and May 13, 2014, agenda number 13-0401.
27. True and correct copies of any and all documents containing allegations, claims, complaints, findings, conclusions, results of investigations, undertaken, prepared and/or generated by any individual or entity investigating the El Dorado County workplace environment undertaken between January 1, 2002 and the present as part of the activities undertaken by VanDermyden Maddus Law firm to complete the cultural assessment survey referenced and discussed in the El Dorado Board of Supervisors meetings held on April 28, 2014 and May 13, 2014, agenda number 13-0401.
28. True and correct copies of any and all documents prepared and/or generated by any individual or entity investigating the El Dorado County workplace environment related to allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** undertaken between April 28, 2014 and the present pursuant to the action plan implemented by the County of El Dorado as a result of the cultural assessment survey completed by VanDermyden Maddus Law firm as authorized by the El Dorado Board of Supervisors in the meeting held on May 13, 2014.

29. True and correct copies of any and all documents containing allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** prepared and/or generated by any individual or entity investigating the El Dorado County workplace environment undertaken between April 28, 2014 and the present pursuant to the action plan implemented by the County of El Dorado as a result of the cultural assessment survey completed by VanDermyden Maddus Law firm as authorized by the El Dorado Board of Supervisors in the meeting held on May 13, 2014.
30. True and correct copies of any and all reports containing allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor – Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** prepared and/or generated by any individual or entity investigating the El Dorado County workplace environment undertaken between April 28, 2014 and the present pursuant to the action plan implemented by the County of El Dorado as a result of the cultural assessment survey completed by VanDermyden Maddus Law firm as authorized by the El Dorado Board of Supervisors in the meeting held on May 13, 2014.
31. True and correct copies of any and all documents generated or prepared by a special master(s) containing allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** prepared and/or generated between April 28, 2014 and the present pursuant to the action plan implemented by the County of El Dorado as a result of the cultural assessment survey completed by VanDermyden Maddus Law firm as authorized by the El Dorado Board of Supervisors in the meeting held on May 13, 2014.
32. True and correct copies of all checks, drafts, payment vouchers, and payment records referencing or pertaining to payments made by or on behalf of El Dorado County for the completion of the cultural assessment survey completed by VanDermyden Maddus Law firm.
33. True and correct copies of all checks, drafts, payment vouchers, and payment records referencing or pertaining to payments made by or on behalf of El Dorado County for the implementation of the action plan by the El Dorado County as a result of the cultural assessment survey completed by

VanDermyden Maddus Law firm, as authorized by the El Dorado Board of Supervisors in the meeting held on May 13, 2014.

34. True and correct copies of any and all documents containing allegations, claims, complaints, findings, conclusions, results of investigations, and/or results of Grand Jury hearings and proceedings undertaken, and/or Grand Jury hearing transcripts prepared and/or generated by any and all Grand Jurys, representatives of any and all Grand Jurys, and/or Grand Jurors regarding or pertaining to any/all activities undertaken to investigate Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) between January 1, 2000 and the present.
35. True and correct copies of any and all documents containing allegations, claims, complaints, findings, conclusions, results of investigations, pertaining to claims, complaints, lawsuits, and/or workers compensation actions made against made against Joe Harn (El Dorado County Auditor – Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT**, undertaken, prepared and/or generated by any individual or entity investigating the El Dorado County workplace environment undertaken between January 1, 2002 and the present as part of the activities undertaken by VanDermyden Maddus Law firm to complete the cultural assessment survey referenced and discussed in the El Dorado Board of Supervisors meeting held on April 28, 2014 and May 13, 2014, agenda number 13-0401.
36. True and correct copies of any and all documents containing allegations, claims, complaints, findings, conclusions, determinations, recommendations, results of investigations, pertaining to claims, complaints, lawsuits, and/or workers compensation actions and/or alleged wrongdoing of Joe Harn, made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn), undertaken, prepared and/or generated by any Supervisor, or staff member, of the El Dorado County Board of Supervisors between January 1, 2000 and the present
37. True and correct copies of all settlement agreement, release agreements, settlement and release agreements entered into by Joe Harn and/or the County of El Dorado pertaining to allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** entered into during the time period of January 1,

2000 through the date of this letter, including but not limited to such agreements entered into with or on the behalf of KELLY OR KELLIE WEBB; BONNIE RICH; RENEE OR RENAE MARTINELLI; CATHY OR KATHY SARGENT; KEELIE OR KEELEY GONZALES; SALLY OR SALLIE ZUTTER; MELANIE OR MELONY DAPER; DEBBIE BARFIELD; KITTY MILLER; MICHAEL APPLGARTH; CATHY OR KATHY LEVICKI; MARY SMITH; CAROL LEWIS; KIRK SMITH; TERRY DALY; JANET CARLEY; as well as employees/past employees with the first names of Bonnie, Renee, Renae, Kathy, Cathy, Tina, Kathy, Kellie, Kelly, Keelie, Keeley, Sally, Sallie, Melanie, and/or Debbie. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings, which information is readily available to El Dorado County.)

38. True and correct copies of all employment separation agreements, entered into by Joe Harn and/or the County of El Dorado pertaining to allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** entered into during the time period of January 1, 2000 through the date of this letter, including but not limited to such agreements entered into with or on the behalf of KELLY OR KELLIE WEBB; BONNIE RICH; RENEE OR RENAE MARTINELLI; CATHY OR KATHY SARGENT; KEELIE OR KEELEY GONZALES; SALLY OR SALLIE ZUTTER; MELANIE OR MELONY DAPER; DEBBIE BARFIELD; KITTY MILLER; MICHAEL APPLGARTH; CATHY OR KATHY LEVICKI; MARY SMITH; CAROL LEWIS; KIRK SMITH; TERRY DALY; JANET CARLEY as well as employees/past employees with the first names of Bonnie, Renee, Renae, Kathy, Cathy, Tina, Kathy, Kellie, Kelly, Keelie, Keeley, Sally, Sallie, Melanie, and/or Debbie. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings, which information is readily available to El Dorado County.)

39. True and correct copies of all employment severance agreements, entered into by Joe Harn and/or the County of El Dorado pertaining to allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** entered into during the time period of January 1, 2000 through the date of this letter, including but not limited to such agreements entered into with or on the behalf of

KELLY OR KELLIE WEBB; BONNIE RICH; RENEE OR RENAE MARTINELLI; CATHY OR KATHY SARGENT; KEELIE OR KEELEY GONZALES; SALLY OR SALLIE ZUTTER; MELANIE OR MELONY DAPER; DEBBIE BARFIELD; KITTY MILLER; MICHAEL APPLGARTH; CATHY OR KATHY LEVICKI; MARY SMITH; CAROL LEWIS; KIRK SMITH; TERRY DALY; JANET CARLEY as well as employees/past employees with the first names of Bonnie, Renee, Renae, Kathy, Cathy, Tina, Kathy, Kellie, Kelly, Keelie, Keeley, Sally, Sallie, Melanie, and/or Debbie. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings, which information is readily available to El Dorado County.)

40. True and correct copies of all employment resignation agreements, entered into by Joe Harn and/or the County of El Dorado pertaining to allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** entered into during the time period of January 1, 2000 through the date of this letter, including but not limited to such agreements entered into with or on the behalf of KELLY OR KELLIE WEBB; BONNIE RICH; RENEE OR RENAE MARTINELLI; CATHY OR KATHY SARGENT; KEELIE OR KEELEY GONZALES; SALLY OR SALLIE ZUTTER; MELANIE OR MELONY DAPER; DEBBIE BARFIELD; KITTY MILLER; MICHAEL APPLGARTH; CATHY OR KATHY LEVICKI; MARY SMITH; CAROL LEWIS; KIRK SMITH; TERRY DALY; JANET CARLEY as well as employees/past employees with the first names of Bonnie, Renee, Renae, Kathy, Cathy, Tina, Kathy, Kellie, Kelly, Keelie, Keeley, Sally, Sallie, Melanie, and/or Debbie. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings, which information is readily available to El Dorado County.)

41. True and correct copies of all agreements entered into by Joe Harn and/or the County of El Dorado pertaining to allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** entered into during the time period of January 1, 2000 through the date of this letter

42. True and correct copies of all settlement agreement, release agreements, settlement and release agreements entered into by Joe Harn and/or the County of El Dorado pertaining to allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT TOWARD OTHER AGENCIES AND ENTITIES** entered into during the time period of January 1, 2000 through the date of this letter.
43. True and correct copies of any and all data contained in all County of El Dorado data bases regarding and/or pertaining to workplace/employment related allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter, which involved employees/ex-employees of El Dorado County including, but not limited to, KELLY OR KELLIE WEBB; BONNIE RICH; RENEE OR RENAE MARTINELLI; CATHY OR KATHY SARGENT; KEELIE OR KEELEY GONZALES; SALLY OR SALLIE ZUTTER; MELANIE OR MELONY DAPER; DEBBIE BARFIELD; KITTY MILLER; MICHAEL APPLGARTH; CATHY OR KATHY LEVICKI; MARY SMITH; CAROL LEWIS; KIRK SMITH; TERRY DALY; AND JANET CARLEY. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings, which information is readily available to El Dorado County.)
44. True and correct copies of any and all data contained in all County of El Dorado data bases regarding and/or pertaining to workplace/employment related allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter, which involved employees/ex-employees of El Dorado County including, but not limited to, such individuals with the first names of Bonnie, Renee, Renae, Kathy, Cathy, Tina, Kathy, Kellie, Kelly, Keelie, Keeley, Sally, Sallie, Melanie, and/or Debbie. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings and last names which information is readily available to El Dorado County.)

45. True and correct copies of any and all data contained in all County of El Dorado data bases regarding and/or pertaining to the cost, expenses, legal fees, investigative expenses, settlement costs, and other costs and expenses incurred by the County of El Dorado and/or its insurance companies as a result of workplace/employment related allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter.
46. True and correct copies of any and all data contained in all County of El Dorado data bases regarding and/or pertaining to the any and all increases in the cost of insurance to the County of El Dorado increased as a result of workplace/employment related allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter.
47. True and correct copies of any and all data contained in all County of El Dorado data bases regarding and/or pertaining to the any and all employees who left employment with El Dorado County as a result of workplace/employment related allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter.
48. True and correct copies of any and all documents containing the names of any and all employees who left employment with El Dorado County as a result of workplace/employment related allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter.
49. True and correct copies of any and all data contained in all data bases which contain data generated, developed and/or maintained by outside entities, agencies, contractors, subcontractors, investigators, insurance companies, law firms, and claim adjusting companies, regarding and/or pertaining to workplace/employment related allegations, claims and/or complaints made

against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter, which involved employees/ex-employees of El Dorado County including, but not limited to, KELLY OR KELLIE WEBB; BONNIE RICH; RENEE OR RENAE MARTINELLI; CATHY OR KATHY SARGENT; KEELIE OR KEELEY GONZALES; SALLY OR SALLIE ZUTTER; MELANIE OR MELONY DAPER; DEBBIE BARFIELD; KITTY MILLER; MICHAEL APPEGARTH; CATHY OR KATHY LEVICKI; MARY SMITH; CAROL LEWIS; KIRK SMITH; TERRY DALY; AND JANET CARLEY. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings, which information is readily available to El Dorado County.

50. True and correct copies of any and all data contained in all data bases which contain data generated, developed and/or maintained by outside entities, agencies, contractors, subcontractors, investigators, insurance companies, law firms, and claim adjusting companies, regarding and/or pertaining to workplace/employment related allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** made during the time period of January 1, 2010 through the date of this letter, which involved employees/ex-employees of El Dorado County including, but not limited to, such individuals with the first names of Bonnie, Renee, Renae, Kathy, Cathy, Tina, Kathy, Kellie, Kelly, Keelie, Keeley, Sally, Sallie, Melanie, and/or Debbie. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings and last names which information is readily available to El Dorado County.

51. True and correct copies of any and all data contained in all County of El Dorado data bases regarding and/or pertaining to money paid to or on behalf of employees and/or ex-employees El Dorado County (By Joe Harn, the County of El Dorado and/or any individual or entity acting on their behalf, including insurance companies) as a result of workplace/employment related allegations, claims and/or complaints made against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** paid out during Joe Harn’s tenure as Auditor-Controller.

52. True and correct copies of any and all documents that contain information about allegations, claims and/or complaints that Joe Harn impregnated employees/ex-employees of El Dorado County.
53. True and correct copies of any and all checks used to pay claimants who made allegations, claims and/or complaints against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** paid during the time period of January 1, 2010 through the date of this letter.
54. True and correct copies of any and all checks used to pay claimants who filed lawsuits and/or workers compensations actions against Joe Harn (El Dorado County Auditor –Controller) and/or the County of El Dorado (regarding the conduct of Joe Harn) pertaining to the **SUBJECT CONDUCT** paid during the time period of January 1, 2010 through the date of this letter.
55. True and correct copies of any and all workers compensation claims and/or complaints made for injuries or harm allegedly caused by Joe and/or the County of El Dorado due to Joe Harn engaging in the **SUBJECT CONDUCT** for workers compensation cases filed during the time period of January 1, 2008 through the date of this letter.
56. True and correct copies of all documents prepared by the El Dorado County Human Resource Department documenting claims of workplace related employment or harassment made against the County of El Dorado and/or Joe Harn (El Dorado County Auditor –Controller) made during the time period of January 1, 2010 through the date of this letter involving **KELLY OR KELLIE WEBB; BONNIE RICH; RENEE OR RENAE MARTINELLI; CATHY OR KATHY SARGENT; KEELIE OR KEELEY GONZALES; SALLY OR SALLIE ZUTTER; MELANIE OR MELONY DAPER; DEBBIE BARFIELD; KITTY MILLER; MICHAEL APPLGARTH; CATHY OR KATHY LEVICKI; MARY SMITH; CAROL LEWIS; KIRK SMITH; TERRY DALY; JANET CARLEY** as well as employees/past employees with the first names of Bonnie, Renee, Renae, Kathy, Cathy, Tina, Kathy, Kellie, Kelly, Keelie, Keeley, Sally, Sallie, Melanie, and/or Debbie. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings, which information is readily available to El Dorado County.)

57. True and correct copies of El Dorado County's written practices and procedures, effective between January 1, 2010 and the present, which were to be utilized for making and/or processing allegations, complaints, and/or claims of **WORKPLACE RELETED MISCONDUCT**.

(WORKPLACE RELETED MISCONDUCT refers conduct in the workplace including: retaliation; discrimination; age discrimination; sex discrimination; harassment; sexual harassment; humiliation; mental abuse; emotional abuse; physical abuse; disparate treatment of others based on their sex or sexual orientation; behavior that created a hostile workplace environment; retaliation against whistleblower(s); retaliation against person(s) who made allegations, complaints, or claims against him; intimidation; improper demotion; wrongful termination; constructive termination; improper layoff; improper termination within probationary periods; mistreatment of department residents; work place bullying; improper yelling; improper belittling of employees; and/or requesting that employees engage in misconduct on his behalf including but not limited to assisting him in obtaining negative information about others to be used against them and/or engaging in retaliatory action against others.)

58. True and correct copies of emails created during the time period of January 1, 2012 through December 31, 2014 between Sheri Adams, Cheri Adams, Sherri Adams, Kim Kerr and/or Teri or Terry or Terri Daly involving and/or referencing any and all payment(s) made by George Hills and/or George Hills Company and/or George Hills Company, Inc. of Rancho Cordova, CA to employees/past employees that include **KELLY OR KELLIE WEBB; BONNIE RICH; RENEE OR RENAE MARTINELLI; CATHY OR KATHY SARGENT; KEELIE OR KEELEY GONZALES; SALLY OR SALLIE ZUTTER; MELANIE OR MELONY DAPER; DEBBIE BARFIELD; KITTY MILLER; MICHAEL APPLGARTH; CATHY OR KATHY LEVICKI; MARY SMITH; CAROL LEWIS; KIRK SMITH; TERRY DALY;** as well as employees/past employees with the first names of Bonnie, Renee, Renae, Kathy, Cathy, Tina, Kathy, Kellie, Kelly, Keelie, Keeley, Sally, Sallie, Melanie, and/or Debbie. (The spellings of these names are believed to be correct, but may not be exactly correct. El Dorado County records would reflect the exact spellings, which information is readily available to El Dorado County.)

Respectfully Submitted,

Joseph R. Baer

El Dorado County Board of Supervisors

Meeting Date: May 15, 2018

Open Forum Commentary

By Terry Kayes, District 3

Comments on Funding the Health and Human Services Agency

At this podium at the Board meeting on May 8th, I made a hash of my commentary on the County's Health and Human Services Agency. For that I apologize. Over the preceding several weeks, I had been pushed to the edge of exhaustion by a family medical crisis, and wasn't thinking clearly.

To reiterate and clarify, I want to strongly encourage the Board to give HHSA top priority in its budgetary deliberations in the years ahead, for the following reasons:

1. The people of the County are its most important asset, and I submit, the most important part of its infrastructure — more so than its roads and bridges, and its water and power supply systems. Helping keep the County's people emotionally and physically healthy is essential to its future.
2. Contrary to popular belief, people who tend to have difficulty with behavioral and emotional health problem are not a drain on society. Many of our nation's most talented and productive people — scientists, engineers, technologists, creative writers, lawyers, fire fighters, teachers, and successful entrepreneurs — have significant problems with affective disorders, such as depression, anxiety, panic attacks, bipolar disorder and post-traumatic stress disorder. In our increasingly frenzied world, these and other emotional problems have reached epidemic levels. With increasing frequency, some of our most productive

people need rescuing and help to deal with their difficulties, as do many less-fortunate adults and children.

3. Many elderly people and children these days are increasingly at risk due to abuse, neglect, malnutrition, or impoverished medical care. Dealing with these problems in a timely manner not only reflects on our humanity, but makes financial sense by not shirking problems that will cost far more to deal with in the future. As with other parts of the County's resources, not taking care of its people is economic nonsense.
4. Over the past few years, under the sterling leadership of Dr. Patricia Charles-Heathers, Health and Human Services has arguably become the County's most improved and forward-looking department. The highly positive benefits of its work became glaringly obvious to me a few years ago, during a period when I was actively involved in trying to help some homeless people get back on their feet. In my considered opinion, to not adequately fund HHSA in its ever-improving efforts would not only be irresponsible, but criminal.

Thank you for your attention.