

Message

From: Veronica Lebron [Veronica@robertsilversteinlaw.com]
Sent: 5/8/2020 10:26:28 AM
To: Artie Fields [afields@cityofinglewood.org]; Alex Padilla [apadilla@cityofinglewood.org]; Eloy Morales Jr. [emorales@cityofinglewood.org]; gdolson@cityofinglewood.org; ibecproject [ibecproject@cityofinglewood.org]; James Butts [jbutts@cityofinglewood.org]; Ken Campos [kcampos@cityofinglewood.org]; Louis Atwell [latwell@cityofinglewood.org]; Mindala Wilcox [mwilcox@cityofinglewood.org]; Ralph Franklin [rfranklin@cityofinglewood.org]; Wanda Brown [wbrown@cityofinglewood.org]; Yvonne Horton [yhorton@cityofinglewood.org]; bgridley@kbblaw.com
CC: Esther Kornfeld [Esther@robertsilversteinlaw.com]; Naira Soghatyan [Naira@robertsilversteinlaw.com]; Robert Silverstein [Robert@robertsilversteinlaw.com]
Subject: Follow-up California Public Records Act Request | IBEC Project SCH 2018021056; Billboard Project Case No. EA-MND-2019-102
Attachments: 4-23-20 [SCAN] Brown Act Violation Cure and Correct Demand to City of Inglewood re SCH 2018021056; CPRA Request.PDF

Dear Mayor, Councilmembers, and City Clerk and City officials:

Please include this communication in the administrative record for the IBEC Project and its EIR, SCH 2018021056.

This is a follow-up on our Public Records Act (CPRA) request on April 22, 2020 to Public Works (below), as well as our CPRA requests as part of our Brown Act Cure and Correct letter dated April 23, 2020 (attached).

As part of our Cure and Correct request at p. 2, we requested the settlement agreement(s) that was/were signed by Mayor Butts during the March 24, 2020 Council meeting.

Also, at p. 9 of the same April 23, 2020 letter, under a separate CPRA section, we requested records related to the closed door session at the March 24, 2020 Council meeting. We stated:

"In view of the above-noted violations, where the Mayor and City improperly discussed the settlement agreement and related "CEQA review" issues and lawsuits during the closed session instead of in the open session as required by law, **we request** that the City provide the audio and video recordings of that closed session, as well as any minutes, notes, or records made or exchanged by anyone present at the meeting re same." (Emph. added.)

More than 10 days have passed since our requests on April 22 and April 23, 2020, without response by the City to our document requests, and without producing a single document.

The City is in violation of the CPRA, including Govt. Code Sec. 6253(c), for failure to respond to our CPRA requests within the statutory 10-day deadline. Please immediately comply. We reserve all rights to file a petition for writ of mandate to compel disclosure of these documents and recordings, and to seek award of attorney fees and costs, including pursuant to Govt. Code Sec. 6259(d).

Thank you.

Veronica Lebron
The Silverstein Law Firm, APC

215 North Marengo Avenue, 3rd Floor
Pasadena, CA 91101-1504
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From: Veronica Lebron
To: mwilcox@cityofinglewood.org ; yhorton@cityofinglewood.org; latwell@cityofinglewood.org
CC: Robert Silverstein; Naira Soghatyan; Esther Kornfeld
Date: 4/22/2020 5:17 PM
Subject: California Public Records Act Request | IBEC Project SCH 2018021056; Billboard Project Case No. EA-MND-2019-102

Dear Public Works Officials:

This is a public records request made pursuant to Government Code § 6250, et seq.

Please provide the following documents:

- 1) All documents and communications - from January 1, 2020 through the date of your compliance with this request - which relate or refer to the public works, construction, or improvements on **S. Prairie St., between 10200-10212 S. Prairie St.** or within 300 feet of same in each direction, including but not limited to the purpose of these ongoing improvements and or construction, the associated projects and applicants that the construction/improvement work is related to, as well as any road or sidewalk widening plans for the noted area on S. Prairie St.;
- 2) All documents and communications - from January 1, 2018 through the date of your compliance with this request - which relate or refer to the **IBEC Project's (aka Murphy's Bowl) SCH 2018021056** proposed signage, or signage that would be used, in whole or in part, in connection with events at the proposed IBEC project including but not limited to communications from the planner, the City's various departments, Mayor Butts and Council members, as well as the Applicant Murphy's Bowl, LLC and its representatives and agents;

3) All documents and communications - from January 1, 2018 through the date of your compliance with this request - which relate or refer to the **Billboard Project EA-2019-102 by WOW Media, Inc.** and the installation of motion billboard signs on S. Prairie St. between 10200-10204 S. Prairie St., including but not limited to communications from the planners, the City's various departments, Mayor Butts and Council members, as well as WOW Media, Inc. and its representatives and agents.

Govt. Code § 6253.9(a) requires that the agency provide documents in their native format, when requested. Pursuant to that code section, **please also provide the requested documents, including all applications, in their native and electronic format.**

Because I am emailing this request on April 22, 2020, please ensure that your response is provided to me by no later than **May 2, 2020**. Thank you.

Also, **please include** this correspondence and CPRA request in the administrative record and council files for both the IBEC Project and the Billboard Project, as described above.

Thank you.

Veronica Lebron
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