

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

April 27, 2022
(Sent by email)

Mr. Norman de Vall
Acting 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: Second Supplemental Public Records Request

Dear Mr. de Vall and Ms. Spring:

I am sending you this second 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.

“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 February 28, 2022.

“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.

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. 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. A privilege log identifying all Documents responsive to my February 28 Public Records Request that are being withheld from production based on the attorney-client privilege.
2. All Documents that mention or pertain to Amy McColley’s participation in identifying documents responsive to my February 28 Public Records Request that are being withheld from production based on the attorney-client privilege.
3. All Documents that mention or pertain to Jacob Patterson’s participation in identifying documents responsive to my February 28 Public Records Request that are being withheld from production based on the attorney-client privilege.
4. All Documents that mention or pertain to the participation of any lawyer other than Jacob Patterson in identifying documents responsive to my February 28 Public Records Request that are being withheld from production based on the attorney-client privilege.

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5. All Documents that describe the criteria used for identifying Documents responsive to my February 28 Public Records Request that will be withheld from production based on the attorney-client privilege.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "John Allison". The signature is written in a cursive style with a large initial "J" and "A".

John Allison