

Michelle Olson  
P.O. Box 582  
Mt. Baldy, CA 91759  
molson@4000ft.com

RECEIVED  
CITY OF GARDEN GROVE  
CITY CLERK'S OFFICE

2015 AUG 19 A 10: 20

August 14, 2015

City of Garden Grove  
Attn: City Clerk  
11222 Acacia Parkway  
Garden Grove, CA 92840

Re: Request for Public Records Garden Grove—Inquiry about costs and Public Records Request for Documents

To whom it may concern:

Back in August of 2013 I sent a public records request asking for copies of all complaints and government tort claims filed against law enforcement officers for civil rights violations, how much it cost the City of Garden Grove to defend those cases and how much it cost to settle those cases. I received a response from the City Attorney indicating that many of the records that I had requested had been placed in storage and were not easily accessible to City Staff. A spreadsheet was also included containing some of the information I was seeking. I have enclosed a copy of my original complaint, along with the response letter dated August 12, 2013 for your reference.

Please consider this a new request if you must. I would still be interested in obtaining copies of those documents requested earlier. I have enclosed a deposit check for the amount of \$15 so that the City can commence retrieving records form storage and making copies. In addition, I am requesting all records dating from the present to 5 years back. Thank you.

Sincerely,



Michelle Olson  
Enclosures: 2 Letters, Deposit Check



CHRISTINA M. PETERUTO  
DIRECT DIAL: (714) 415-1068  
DIRECT FAX: (714) 415-1168  
E-MAIL: CPETERUTO@WSS-LAW.COM

August 12, 2013

**VIA FIRST CLASS MAIL**

Ms. Michelle Olson  
P.O. Box 582  
Mt. Baldy, CA 91759

Re: Request for Public Records – City of Garden Grove

Dear Ms. Olson:

This letter is in response to your correspondence regarding your request for public records from the City of Garden Grove ("City"). The City's notice of determination regarding your request was sent to you on July 3, 2013. Included with the notice of determination was a spreadsheet with all of the claims filed against the City involving the Garden Grove Police Department. Another copy of this spreadsheet is enclosed for your reference.

The enclosed spreadsheet contains much of the information you are seeking. The claimant's name, date of loss, and a general description of the claimant's allegations are included. The column titled "Legal" identifies whether a lawsuit was filed. The "Net Payment Loss" column identifies any amounts paid to the claimant, and the "Net Payment Expense" column identifies expenses incurred to date, including attorneys' fees. Your letter indicates you would like to know the number of claims against the Garden Grove Police Department and the associated costs. All of this information is included on the spreadsheet.

Your letter states you would like copies of the claims and complaints. As indicated in our previous letter, many of the records you are seeking have been placed in storage and are not easily accessible to City staff. In addition, the records are expected to be several hundred pages. The fee for copies is \$0.10 per page. If you would still like copies of all of the records, please submit a deposit check to the City in the amount of \$15.00 to:

City of Garden Grove  
Attn: City Clerk  
11222 Acacia Parkway  
Garden Grove, CA 92840

Upon receipt of your deposit check, the City will commence retrieving records from storage and making copies. Once the City finishes making copies of the records, you will be notified, and the records will be made available for pick-up upon receipt of payment for any copy fees not covered by the \$15.00 deposit.

555 ANTON BOULEVARD, SUITE 1200 ■ COSTA MESA, CA 92626-7670 ■ (714) 558-7000 ■ FAX (714) 835-7787  
WWW.WSS-LAW.COM

948519.1

August 12, 2013

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Should you have any further questions regarding your request, please feel free to contact our office.

Very truly yours,

WOODRUFF, SPRADLIN & SMART  
A Professional Corporation

  
CHRISTINA M. PETTERUTO

Enclosure

cc: Denise Kehn, Deputy City Clerk

Michelle Olson  
PO Box 582  
Mt Baldy CA 91759

City of Garden Grove

**Inquiry about costs  
and Public Records Request for Documents**

Pursuant to the state open records law, Cal. Gov't Code Secs. 6250 to 6277, I request copies of documents related to the Garden Grove Police Department.

I am requesting copies of all government tort claims filed against law enforcement officers for civil rights violations in the past three (3) years. This would include any allegations, as an example, like falsified police reports, false arrest, excessive force and prisoner abuse. I am requesting the names of the police officers involved in each claim, as well as a copy of any medical records that were attached to, or accompanied, the tort claims.

I am also requesting copies of any complaints (aka lawsuits filed in a court of law) filed against the agency or its law enforcement officers for the same type of civil rights violations.

**Most importantly though, I would like to determine the cost of the defense of these cases.** So I am requesting copies of any documents that show the cost of the legal fees paid for these matters, including the total cost of litigations that have concluded in the last three years. (This may mean that the case was filed before three years ago but has subsequently resolved in the last three years. )

*If possible, I would like computer printouts, or computerized accounting docs showing this information - any sort of printout that shows or names the cases and indicates the amount of the attorneys fees and other costs of defense for that case.*

**Settlement or payment to plaintiff or claimant**

I would also like to get a copy of any document that reflects the settlement amount, or the payment made in the last three years to any plaintiff or claimant alleging a civil rights matter no matter when the matter was filed or served.

**Cost of Defense - Payment to private firms:**

Lastly, I would like a printout or documents that reflect what private law firms are paid by the City per year for the defense of civil rights cases for the last five years. I would appreciate if that information can be sorted by the case name, if possible.

**General Information about request.**

Please do not remove or cover up any information on the documents you are providing, even if the information falls outside of my request, unless the removal is required by law.

I will not pay for duplication fees unless a reasonable explanation is given. Please provide an explanation indicating the charges for each document.

As provided in the open records law, Sec. 6253(c), I will expect your response within ten (10) business days. If you choose to deny this request, please provide a written explanation for the denial including a reference to the specific statutory exemption(s) upon which you rely. Also, please provide all segregable portions of otherwise exempt material.

Thank you for your assistance. I would appreciate a written response to the above address.

Date of request: 06/24/13

Michelle Olson *Michelle Olson*

MICHELLE OLSON  
P O BOX 582  
MT BALDY CA 91759

1030

11-35/1210 CA  
71173

Aug. 14, 2015  
Date

Pay to the  
Order of

City of Garden Grove

\$ 15.00

Fifteen and 00/100

Dollars



Security  
Features  
Details on  
Back.

Bank of America

ACH R/T 121000358

For

Deposit for Documents Michelle Olson

MP

⑆ 121000358⑆ 325022147736⑈ 1030