



August 27, 2019

VIA E-MAIL: doapublicrecords@la.gov
Division of Administration
State of Louisiana

RE: Public Records Request of Zach Parker

To Whom It May Concern:

The undersigned and this law firm represent *The Ouachita Citizen*. Our edit requested on August 22, 2019 the following public records:

- The hours, rate, dates of service and money spent on legal services p by the state on behalf of Margaret Allyson Campbell, of Monroe, who clerk at Fourth Judicial District Court in Monroe. The Attorney G office is currently representing her in a civil lawsuit, Stanley R. Palo and others v. Allyson Campbell and others.

- Any and all attorneys' invoices and/or bills for legal services provi Allyson Campbell of Monroe.

Of note, Mr. Parker was referred to your office by the Attorney G Campbell's attorney.

Your response of August 27, 2019 claims an exemption as to the re information pursuant to La. R.S. 44:4(15). That specific exemption of the put applies only to "claim files in the custody or control" of the office or risk man intended, by its clear language, to protect "information concerning pending legal cl of any attorney representing the state."

To our knowledge, this provision has never been interpreted or construec release of records of the expenditure of public funds. Mr. Parker's request does mental impressions, work product or the loss reserve of your office or the attorr Ms. Campbell. Specifically, Mr. Parker is asking for the records of the amour taxpayers of Louisiana have spent on her lawyer. This expenditure of public fund public interest is at the heart of the Louisiana Public Records Law and is regularly

¹ See, e.g., "How Louisiana taxpayers wound up reimbursing Judge Jeff Hughes \$100K after *The Advocate*, August 24, 2019, available at: www.theadvocate.com/baton_rouge/news/courts/ar-c5f5-11e9-9f88-e7dd8ae0b633.html; (more examples on Page 2)

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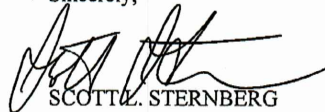


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In fact, the Public Records Law is specifically designed to “keep the public reasonably informed about how public bodies conduct their business and how the affairs of government are handled.” *City of Baton Rouge/Parish of East Baton Rouge v. Capital City Press, L.L.C.*, 4 So.3d 807, 817 (La. App. 1 Cir. 2008); The *Capital City Press* court particularly recognized that the law protects the public’s right to know “about the operations of a public agency, ... [and] in gaining information to evaluate the expenditure of public funds.” *Id.* at 821. *See also Angelo Iafrate Const., LLC v. State DOTD*, 879 So. 2d 250, 261 (La. App. 1 Cir. 2004).

Your interpretation of the Public Records Law flies in the face of the law’s purpose and meaning, and I ask that you reconsider your denial by August 30, 2019. My Client is willing to accept certain redactions if you believe the narratives have privileged information, along with a privilege log.

Sincerely,



SCOTT L. STERNBERG

“Louisiana Legislators Are Earning Big Money From Government Agencies — But Don’t Have to Disclose It All,” *ProPublica*, available at: <https://www.propublica.org/article/louisiana-legislators-are-earning-big-money-from-government-agencies-but-dont-have-to-disclose-it-all>; “City of Vidalia to pay \$103,000 in legal fees,” *The Natchez (MS) Democrat*, available at: <https://www.natchezdemocrat.com/2016/04/13/city-of-vidalia-to-pay-103000-in-legal-fees/>

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Petitioner’s Exhibit 4

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