

**SPECIAL MEETING AGENDA
SAN SIMEON COMMUNITY SERVICES DISTRICT
BOARD OF DIRECTORS SPECIAL BOARD MEETING
Tuesday, November 8, 2022
3:30 pm**

Pursuant to San Simeon CSD Resolution 22-458 and incompliance with AB 361 this meeting shall occur as a virtual teleconference using the Zoom app.

Internet Meeting Location – Via ZOOM

Join Zoom for Special Board Session:

<https://us02web.zoom.us/j/89334961643?pwd=NWx2V3lKaUdTTmI2RmVVaGpBYk5hQT09>

Or Telephone:

Dial (for higher quality, dial a number based on your current location):

US: +1 669 900 9128

The following commands can be entered via DTMF tones using your **phone's** dial pad while in a **Zoom meeting**: *6 - Toggle mute/unmute. *9 - **Raise hand**.

Meeting ID: 893 3496 1643

Passcode: 972125

NOTE: On the day of the meeting, the virtual meeting room will be open 30 minutes prior to the meeting start time. If you wish to submit public comment in the written format you can email Cortney Murguia at admin@sansimeoncsd.org. Members of the public can also contact the District office at (805) 927-4778 or (805) 400-7399 with any questions or concerns related to this agenda or accessing the meeting.

1. OPEN SESSION: 3:30 PM

A. Roll Call

2. CLOSED SESSION:

This public comment period provides an opportunity for members of the public to address the Board on Closed Session Agenda Items. Public Comment is limited to three (3) minutes.

The Board will adjourn to Closed Session to address the following items:

A. CONFERENCE WITH LEGAL COUNSEL - POTENTIAL LITIGATION

Pursuant to Government Code §54956.9(d)(2)

Title: Grace Environmental Services, LLC – Request for indemnity

******Reportable action from Closed Session will occur at the 5 PM Regular Session******

3. ADJOURNMENT –

All staff reports or other written documentation, including any supplemental material distributed to a majority of the Board within 24 hours of a special meeting relating to each item of business on the agenda are available for public inspection during regular business hours in the District

office, 111 Pico Avenue, San Simeon. If requested, this agenda shall be made available in appropriate alternative formats to persons with a disability, as required by the Americans with Disabilities Act. To make a request for a disability-related modification or accommodation, contact the District Administrator at 805-927-4778 as soon as possible and at least 48 hours prior to the meeting date. This agenda was prepared and posted pursuant to Government Code Section 54954.2.

**ATTORNEYS AT LAW**

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Refer To File # 504017-0001

October 31, 2022

Mr. Joshua M. George
Adamski Moroski Madden Cumberland & Green LLP

Via email only jgeorge@ammcqlaw.com

Re: Indemnification for legal fees

Dear Mr. George:

On behalf of our clients Mr. Grace and Grace Environmental Services (“GES”), please see attached Nossaman’s redacted invoice entries to support his indemnification request for legal fees in the amount of \$166,086.78. The legal fees directly arise from actions taken pursuant to GES’s contract with the San Simeon Community Services District (“SSCSD”) or at the direction of the SSCSD’s Board of Directors, and therefore the Board must approve Mr. Grace’s request.

The invoices cover the period from December 2020 through June 2022. The total amount of legal fees that GES has incurred to date for defending both the Fair Political Practices Commission (FPPC) and San Luis Obispo County District Attorney investigations is \$233,787.50. SSCSD previously indemnified GES \$49,246.63 for legal fees in connection with FPPC Enforcement Matter 2020-00416 only, which is now closed. As noted in our letter of September 23, 2022, the current request reflects the amount of legal fees in connection with the District Attorney’s investigation and defending a number of separate frivolous FPPC complaints, all of which were ultimately rejected.

To avoid confusion, we also point out that many of the invoice entries from December, 2020 through November, 2021 were previously provided to SSCSD as a part of the request for indemnification incurred in the FPPC matter. While it may appear that some of the entries are redundant from that request, they are not. The amount of fees for each entry was apportioned according to the percent of time spent on the FPPC or DA investigation. This was necessary because at that stage, several of the issues overlapped between the two agencies. Any entry included here reflects only the balance of that time attributable to the DA’s investigation.

GES is not seeking indemnification on the Ninth Cause of Action in the civil complaint. Accordingly, Mr. Grace’s request for \$166,086.78 reflects his total legal fees incurred since the joint investigation commenced, minus the amount paid towards the FPPC matter, and minus a 10% reduction to reflect the Cause of Action for which indemnification is not requested.

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In our September 23, 2022 indemnification request letter, we detailed the contractual or other basis for indemnifying GES for these legal fees. For the Board's convenience, we provide that information again here.

- **Count One** is based in part on actions Mr. Grace took in response to complaints lodged against SSCSD for its contracting practices. Count one is also based on actions taken by the then-Chairperson of the Board. Finally, Count one is based on actions Mr. Grace took in response to harassment of GES staff that occurred in the District office. Given that the Agreement requires GES to staff the facility collectively (facility as defined in section I.C. in the contract) eight hours a day, five days a week, any action he took in response to harassment targeted to GES employees is directly related to the Agreement.
- **Count two** arises from communications GES made to the FPPC at the direction of the Board of Directors.
- **Count three** is based on the District Attorney's interpretation of the meaning of the term "Facilities" in the Agreement, as it relates to whether GES or the District is responsible for certain weed abatement costs. This provision has been in the same contract that SSCSD has used with GES's predecessors for decades. GES did not author or have any involvement in including this provision in the contract. It is important to note that the SSCSD Board of Directors had never raised questions about GES's weed abatement invoices, which understandably gave GES the assurance that it was in compliance with the contract term. A member of the public raised the question of who should be responsible for certain weed abatement costs at a public meeting, and when Mr. Grace responded with his understanding of what constitutes the District's "facilities," there was no objection from the Board of Directors or the District's counsel.
- **Count four** alleges that GES did not obtain all of the insurances required by the Agreement. However, during the investigation phase of this action and while attempting to remedy the insurance issue, Mr. Grace learned that the Agreement included an insurance requirement that does not exist. Further, the insurance requirement language in the Agreement was unclear.
- **Count five** arises from SSCSD's longstanding practice of referring to its operations and facilities maintenance contractor as "General Manager" despite not appointing a natural person to fill that statutorily-defined position. Mr. Grace is not a SSCSD board director and could not have appointed himself to be the General Manager. This alleged violation is squarely within the Board's duties.
- **Count six** arises from GES's implementation of Section IV.C of the 2016 Professional Services Agreement. Section IV.C provides, in relevant part: "To the limit of \$40,000 annually, GES shall provide Preventive and Corrective Maintenance or Repairs for FACILITY..." and "SSCSD shall be responsible for and pay all Capital Maintenance, Repair and Replacement costs as defined above." The Complaint alleges that GES misused its discretion when allocating costs to GES or SSCSD. However, expenditure reports are provided to the Board

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Chair and Budget Chair regularly, giving GES the assurance that his allocations were correct and consistent with the District's expectations. We also note that the District has not questioned the propriety of GES's allocations. Similar to Count 3, this provision has been in the same contract that SSCSD has used with GES's predecessors. GES did not author or have any involvement in including this provision in the contract. Mr. Grace merely executed what the contract required GES to do.

- **Count seven** arises from GES's implementation of its contractually-required obligation to prepare and distribute the District's newsletter. This requirement is found in Section IV.O(13) of the 2016 Professional Services Agreement.
- **Count eight** arises from GES's alleged preparation of the April 22, 2021 board meeting agenda, which GES is contractually required to prepare (and does so in coordination with the Board Chairperson) per Section IV.O(10) of the 2016 Professional Services Agreement.

In sum, counts one through eight of the Complaint are based squarely on SSCSD contractual mandates that GES works to satisfy, all performed with oversight and express or implied approval by the Board of Directors. Additionally, two of the counts are based on the DA's belief that certain terms in the contract are ambiguous. At the core of this investigation is a SSCSD contract that was used with predecessor companies, so indemnification is particularly appropriate.

Separately, we wrote to you in our February 14, 2022 letter:

"...three frivolous complaints were filed with the FPPC against Mr. Grace for actions that he and the District took to affirmatively address the matters raised in the underlying FPPC and District Attorney investigations and to address clerical corrections in the GES Professional Services Agreement. Specifically, the gist of the three frivolous complaints is as follows:

- *Complaint No. COM-10252021-03081 (Complainant Hank Krzciuk), containing allegations regarding Mr. Grace's Form 700 (Statement of Economic Interests) cover pages, was rejected on the grounds that "The actions taken by the public official in your complaint are not governed by the (Political Reform) Act, and the complaint failed to establish any violations of the Act."*
- *Complaint No. COM-10182021-03015 (Complainant Julie Tacker) was rejected with the following statement of reasons: "Your complaint alleges that Charles Grace failed to properly recuse himself from an agenda item at the October 12, 2021 San Simeon CSD board meeting, and that the agenda item itself violated Government Code Section 1090. Please note that the rules regarding the manner of disqualification only apply to public officials designated in Government Code Section 87200, of which Mr. Grace is not a member. Additionally, your complaint offers no evidence that Mr. Grace was involved in his official capacity in the contract amendments approved by the San Simeon CSD which would give rise to a violation of Section 1090."*

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- *Complaint No. COM-01032022-03640 (Complaint by Julie Tacker), alleging that Mr. Grace violated Section 1090, this time based on the clerical corrections voted on by the Board at the December 21, 2021 meeting, was rejected.*

All three of these complaints were without merit and were swiftly rejected by the FPPC. Mr. Grace intends to exercise his contractual right to seek indemnification for his costs defending these actions, including attorney's fees, in a future request to the Board as they arose and/or were related to the Professional Services Agreement."

Therefore, this indemnification request includes the fees incurred with defending the three frivolous FPPC complaints.

Please do not hesitate to let us know if the Board requires additional information to support this request.

Sincerely,



Amber Maltbie
Nossaman LLP

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
11/9/2020	AM2	Begin reviewing FPPC complaints and other materials provided by C. Grace.	0.50	272.50
11/10/2020	GWS	Review and analyze District Attorney/FPPC letter to Charles Grace; review Government Code section 1090 [REDACTED].	0.75	450.00
11/11/2020	GWS	Draft email to Amber Maltbie [REDACTED].	0.25	150.00
11/12/2020	AM2	Conference call with C. Grace and G. Sanders to [REDACTED].	1.50	817.50
11/12/2020	GWS	Telephone conference with Charles Grace and Amber Maltbie [REDACTED].	1.25	750.00
11/13/2020	AM2	Draft response letter. Revise [REDACTED]. Transmit to County and FPPC.	1.50	817.50
11/13/2020	GWS	Review draft letter to Deputy District Attorney and FPPC edits; review final letter.	0.25	150.00
11/16/2020	AM2	Initial review of letter from DA in response to our request for additional detail.	0.25	136.25
11/16/2020	GWS	Review and analyze Deputy District Attorney response to letter seeking detail and clarification of charges.	0.25	150.00
11/17/2020	AM2	Finalize review of DA/FPPC letter; preparation conference call with C. Grace [REDACTED].	6.00	3,270.00
11/7/2020	GWS	Review and analyze letter [REDACTED].	0.25	150.00
11/18/2020	AM2	Begin draft [REDACTED].	0.25	136.25
11/18/2020	GWS	Review [REDACTED].	0.25	150.00
11/18/2020	GWS	Review [REDACTED] forwarded by Charles Grace.	0.25	150.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
11/20/2020	GWS	Telephone conference with client [REDACTED] [REDACTED] S.	0.50	300.00
11/20/2020	GWS	Review and analyze LAFCO hearing [REDACTED] [REDACTED]	0.50	300.00
11/24/2020	AM2	Review transmittal letter [REDACTED] [REDACTED]; prepare and transmit email to C. Grace and G. Sanders re same.	0.75	408.75
11/24/2020	GWS	Review draft tolling agreement; respond.	0.25	150.00
11/25/2020	AM2	Attention to C. Grace's response [REDACTED] [REDACTED].	0.25	136.25
11/25/2020	GWS	Review and analyze [REDACTED].	0.25	150.00
12/1/2020	AM2	Review CPI calculations against contract [REDACTED] [REDACTED] S.	1.25	681.25
12/2/2020	AM2	Review CPI calculation [REDACTED] Emails with C. Grace [REDACTED].	1.25	681.25
12/3/2020	AM2	Review 5535 account invoices and transmit responsive documents to the DA.	0.50	272.50
12/4/2020	AM2	Finalize bullet points. [REDACTED] [REDACTED].	3.50	1,907.50
12/6/2020	AM2	Prepare for strategy call [REDACTED] [REDACTED].	0.50	272.50
12/7/2020	AM2	Conference call with C. Grace [REDACTED] [REDACTED].	2.25	1,226.25

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
12/9/2020	AM2	Draft response to inquiry [REDACTED]; review January 2016 board meeting [REDACTED]. Review 5535 account and invoices. Correspond with FPPC re complaint.	3.75	2,043.75
12/10/2020	AM2	Review C. Grace feedback [REDACTED]; review 2014/2016 contract provisions for same. Conference call with C. Grace [REDACTED].	1.50	817.50
12/11/2020	AM2	Review and transmit 5535 account invoices for 2017, FY 2018/2109 and FY 2019/2020.	1.00	545.00
12/14/2020	AM2	Review response letter [REDACTED] internal email to G. Sanders [REDACTED]. Call with C. Grace [REDACTED].	2.00	1,090.00
12/14/2020	GWS	Review and analyze draft letter [REDACTED]; draft email to Amber Maltbie.	0.50	300.00
12/14/2020	GWS	Review and analyze email [REDACTED] etc.	0.25	150.00
12/15/2020	AM2	Attend DA/FPPC meeting; debrief call with C. Grace [REDACTED].	3.50	1,907.50
12/18/2020	AM2	Call with C. Grace [REDACTED].	0.50	272.50
12/22/2020	AM2	Review APT contract; email to C. Grace [REDACTED]. Conference call with C. Grace [REDACTED].	1.75	953.75
12/23/2020	AM2	Review correspondence from DA and prepare update [REDACTED].	0.75	408.75

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
12/23/2020	GWS	Research regarding various issues.	2.00	1,200.00
12/25/2020	AM2	Debrief/strategy conference call with C. Grace and G. Sanders.	1.00	545.00
12/25/2020	GWS	Prepare for conference call with Charles Grace and Amber Maltbie; participate in conference call.	1.25	750.00
12/29/2020	AM2	Respond to question [REDACTED]. Finalize DA/FPPC response letter. Internal communications with G. Sanders [REDACTED].	1.50	817.50
12/29/2020	GWS	Review, revise and edit draft response [REDACTED].	0.75	450.00
12/30/2020	AM2	Finalize DA/FPPC response letter and transmit same.	0.50	272.50
1/3/2021	GWS	Review emails from client [REDACTED].	0.50	300.00
1/20/2021	AM2	Review correspondence from DA; prepare overview email and update to C. Grace and G. Sanders. Begin reviewing emails from [REDACTED].	1.25	681.25
1/11/2021	GWS	Review and analyze email from deputy DA Ken Jorgensen; draft email to Amber Maltbie; outline issues [REDACTED].	1.25	750.00
1/12/2021	AM2	Begin preparing response to DA letter and requests. Review January 2016 board meeting comments [REDACTED].	0.75	408.75
1/12/2021	GWS	Refine issues for discussion [REDACTED].	1.00	600.00
1/13/2021	AM2	Conference call with C. Grace and G. Sanders [REDACTED].	0.50	272.50

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
1/13/2021	GWS	Review email to client [REDACTED]; prepare for telephone conference with client; participate in telephone conference.	1.25	750.00
1/15/2021	AM2	Call with DA Jorgensen and G. Sanders; prep and debrief calls re same.	2.50	1,362.50
1/15/2021	GWS	Prepare for conference call with Deputy DA Ken Jorgensen; telephone conference with Amber Maltbie; participate in conference call: follow up telephone conference with Amber Maltbie.	2.25	1,350.00
1/19/2021	AM2	Prepare memo to file [REDACTED].	0.50	272.50
1/20/2021	AM2	Finalize memo to file [REDACTED]. Email to G. Sanders [REDACTED]. Compile [REDACTED].	2.00	1,090.00
1/21/2021	AM2	Status update and strategy call with C. Grace and G. Sanders.	1.00	545.00
1/21/2021	GWS	Prepare for telephone conference with client and Amber Maltbie; participate in telephone conference.	1.50	900.00
1/25/2021	GWS	Review [REDACTED]	0.25	150.00
1/26/2021	AM2	Conference call with DA and FPPC re case status and next steps. Prepare for same.	1.75	953.75
1/26/2021	GWS	Prepare for conference call with Deputy DA Jorgensen and FPPC attorney; participate in conference call; follow-up review [REDACTED]; draft email to Amber Maltbie.	3.75	2,250.00
2/4/2021	AM2	Review and respond to email from K. Jorgensen. Status update call with C Grace.	0.50	272.50

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
2/4/2021	GWS	Review questions posed by Ken Jorgensen [REDACTED]; review newsletter.	0.25	150.00
2/5/2021	AM2	Prepare overview of legal issue [REDACTED]. Internal email to G. Sanders re same.	1.50	817.50
2/8/2021	AM2	Finalize DA/FPPC response letter and transmit same to DA and FPPC.	0.50	272.50
2/8/2021	GWS	Review and edit transmittal letter to Deputy District Attorney Ken Jorgensen [REDACTED].	0.25	150.00
2/9/2021	AM2	Respond to inquiry [REDACTED]. Review resolution and question [REDACTED].	0.50	272.50
2/11/2021	AM2	Analysis of [REDACTED]. Continue outline [REDACTED] s.	1.00	545.00
2/16/2021	AM2	Review DA response to letter [REDACTED]; email update to G. Sanders and C. Grace re same.	0.75	408.75
2/17/2021	AM2	Attention to email between [REDACTED] and several others [REDACTED] t.	0.25	136.25
2/17/2021	GWS	Review email from hank Krzciuk.	0.25	150.00
2/18/2021	AM2	Prepare preliminary comments to DA letter [REDACTED]; watch board meeting discussions [REDACTED].	2.00	1,090.00
2/19/2021	AM2	[REDACTED] call with C. Grace and G. Sanders.	0.50	272.50
2/19/2021	GWS	Prepare for conference call with Charles Grace and Amber Maltbie; participate in conference call.	0.75	450.00
2/22/2021	AM2	Prepare response to DA/FPPC letter. Circulate same to C. Grace and G. Sanders. Review FPPC complaint against GES employee.	3.00	1,635.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
2/22/2021	GWS	Review notice of complaint from the FPPC [REDACTED]	0.25	150.00
2/22/2021	GWS	Review and analyze draft letter to Deputy District Attorney Ken Jorgensen and FPPC; edit letter; respond to Amber Maltbie.	0.25	150.00
2/23/2021	AM2	Finalize and transmit response to FPPC and DA re issues.	0.50	272.50
2/23/2021	AM2	Conference call with C. Grace [REDACTED].	1.25	681.25
2/25/2021	AM2	Conference call with C. Grace [REDACTED].	0.75	408.75
3/2/2021	AM2	Draft response to FPPC/complaint [REDACTED]; [REDACTED]	1.50	817.50
3/3/2021	AM2	Review DA letter; analysis [REDACTED]s.	1.25	681.25
3/4/2021	AM2	Finalize and transmit FPPC response. Correspond with C. Grace and G. Sanders [REDACTED]s; email to K. Jorgensen [REDACTED].	0.50	272.50
3/4/2021	GWS	Review letter to Deputy DA Ken Jorgensen; transmit email to Charles Grace and Amber Maltbie.	0.25	150.00
3/8/2021	AM2	Review FPPC response to [REDACTED].	0.25	136.25
3/8/2021	GWS	Review complaint letter from the FPPC.	0.25	150.00
3/9/2021	AM2	Analysis of FPPC response [REDACTED] email recommendations to C. Grace. Draft response [REDACTED].	1.00	545.00
3/9/2021	GWS	Review emails from FPPC and Amber Maltbie [REDACTED]; respond to Amber Maltbie.	0.25	150.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
3/9/2021	GWS	Review and analyze [REDACTED]	0.25	150.00
3/10/2021	AM2	Finalize and transmit response to FPPC [REDACTED].	0.25	136.25
3/11/2021	AM2	Draft responses to issues. Review [REDACTED].	4.50	2,452.50
3/12/2021	AM2	Correspond with FPPC [REDACTED].	0.25	136.25
3/12/2021	GWS	Prepare for conference call with Charles Grace and San Simeon Community Services District General Counsel [REDACTED]	0.75	450.00
3/16/2021	AM2	Compile issues and follow up questions [REDACTED]. Compile several supporting materials [REDACTED]	1.50	817.50
3/17/2021	AM2	Continue preparing response to issues letter; review and comment [REDACTED].	4.25	2,316.25
3/18/2021	AM2	Finalize draft response letter [REDACTED] Review several supporting materials and board meeting videos for same.	5.50	2,997.50
3/18/2021	GWS	Review, analyze and edit draft letter to Deputy District Attorney Ken Jorgensen; draft email to Amber Maltbie regarding edits	1.25	750.00
3/22/2021	AM2	Revise letter based on feedback from C. Grace and G. Sanders; attention to compiling supporting exhibits.	1.75	953.75
3/23/2021	GWS	Review and edit response letter to Deputy District Attorney Ken Jorgensen.	0.50	300.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
3/24/2021	AM2	Call with C. Grace [REDACTED]; review FPPC correspondence [REDACTED].	0.50	272.50
3/30/2021	AM2	Call with C. Grace, G. Sanders, J. Minnery [REDACTED].	1.00	545.00
3/30/2021	GWS	Prepare for conference call with client and San Simeon Community Services District General Counsel; participate in conference call.	1.00	600.00
4/2/2021	AM2	Attention to email from FPPC [REDACTED].	0.25	136.25
4/7/2021	AM2	Follow up with C. Grace re [REDACTED].	2.50	1,362.50
4/12/2021	AM2	Review DA/FPPC response letter; continue research/notes [REDACTED]. Emails to C. Grace, G. Sanders and J. Minnery re same.	2.00	1,090.00
4/15/2021	AM2	Transmit Form 700 to FPPC [REDACTED].	0.25	136.25
4/15/2021	AM2	Call with C. Grace [REDACTED].	0.25	136.25
4/21/2021	AM2	Strategy call re [REDACTED]. Prepare by reviewing most recent DA letter.	1.25	681.25
4/21/2021	GWS	Prepare for conference call with client, Amber Maltbie and SSCSD counsel; participate in conference call [REDACTED].	0.75	450.00
4/21/2021	GWS	Review letter from FPPC [REDACTED].	0.25	150.00
4/22/2021	AM2	[REDACTED]	3.00	1,635.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
4/22/2021	GWS	[REDACTED]; follow-up telephone conference with Charles Grace.	2.50	1,500.00
4/26/2021	AM2	Coordinate meeting with DA and FPPC.	0.25	136.25
4/29/2021	GWS	Further preparation for conference call with Deputy District Attorney.	1.00	600.00
4/30/2021	AM2	Call with FPPC, DA and SSCSD counsel. Prepare for same.	1.50	817.50
4/30/2021	GWS	Conference call with Deputy District Attorney.	1.25	750.00
5/4/2021	AM2	Attention to Brown Act complaint, DA letter [REDACTED].	2.00	1,090.00
5/4/2021	GWS	Review and analyze email [REDACTED].	0.75	450.00
5/4/2021	GWS	Prepare for telephone conference with Charles Grace, Amber Maltbie and San Simeon Community Services District attorneys; participate in telephone conference.	1.25	750.00
5/4/2021	GWS	Review and analyze [REDACTED].	0.25	150.00
5/5/2021	AM2	Strategy calls; prepare for same.	2.25	1,226.25
5/6/2021	AM2	Review and comment on letter.	0.50	272.50
5/6/2021	GWS	Review and analyze draft email to Charles Grace [REDACTED] regarding [REDACTED]; telephone conference with Charles Grace and Amber Maltbie [REDACTED].	0.75	450.00
5/6/2021	GWS	Review email from Amber Maltbie; respond.	0.25	150.00
5/12/2021	AM2	Review tolling agreements; email to G. Sanders and C. Grace [REDACTED].	0.25	136.25
5/12/2021	AM2	Draft response to 18 page letter. Analysis of legal arguments for same.	1.00	545.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
5/13/2021	AM2	Continue drafting letter response.	2.25	1,226.25
5/14/2021	AM2	Continue drafting letter response.	1.25	681.25
5/17/2021	AM2	Continued attention to letter drafting.	1.50	817.50
5/18/2021	AM2	Finalize and circulate response to DA/FPPC; call [REDACTED].	5.00	2,725.00
5/18/2021	GWS	Prepare for telephone conference with Charles Grace and Amber Maltbie; review and analyze draft letter [REDACTED]; discuss responses [REDACTED].	2.00	1,200.00
5/18/2021	GWS	Review and analyze [REDACTED] n.	0.25	150.00
5/19/2021	AM2	Finalize letter; prepare attachments. Make revisions [REDACTED].	4.00	2,180.00
5/19/2021	GWS	Draft email to SSCSD General Counsel Jeff Minnery [REDACTED].	0.25	150.00
5/19/2021	GWS	Review and analyze draft response letter [REDACTED]; draft redline and transmit to Charles Grace and Amber Maltbie.	0.25	150.00
5/20/2021	AM2	Prepare and circulate [REDACTED]. Transmit Form 700 to DA/FPPC. Call with C. Grace [REDACTED].	2.75	1,498.75
5/21/2021	AM2	Finalize and circulate second portion of letter.	1.25	681.25
5/21/2021	GWS	Review email from SSCSD General Counsel Jeff Minnery; respond.	0.25	150.00
5/21/2021	GWS	Review and analyze final letter to DDA Ken Jorgensen.	0.25	150.00
5/24/2021	AM2	Modify letter; email to C. Grace and G. Sanders. Finalize and transmit to FPPC/DA.	0.25	136.25

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
5/24/2021	GWS	Telephone conference with SSCSD General Counsel Jeff Minnery regarding [REDACTED].	0.25	150.00
5/24/2021	GWS	Review and analyze second response letter to Deputy District Attorney Ken Jorgensen.	0.25	150.00
5/25/2021	AM2	Review and comment on Form 700 amendments.	0.50	272.50
6/2/2021	AM2	Reminder to C. Grace re additional document submissions; transmit same to DA/FPPC; call with C. Grace [REDACTED]s.	0.50	272.50
6/3/2021	AM2	Attention to email from C. Grace [REDACTED].	0.25	136.25
6/4/2021	AM2	Attention to [REDACTED].	0.50	272.50
6/4/2021	GWS	Prepare for telephone conference with Charles Grace and SSCSD General Counsel regarding [REDACTED]; participate in conference call.	0.50	300.00
6/7/2021	AM2	Status update call with C. Grace and G. Sanders; outreach to K. Jorgensen re same.	0.25	136.25
6/7/2021	GWS	Prepare for telephone conference with Charles Grace and Amber Maltbie; participate in conference call.	0.50	300.00
6/8/2021	AM2	Status update call with K. Jorgensen.	0.50	272.50
6/11/2021	AM2	Prepare email summary [REDACTED].	0.50	272.50
6/11/2021	GWS	Review email from Amber Maltbie [REDACTED]; draft response.	0.25	150.00
6/15/2021	AM2	Strategy call with C. Grace and G. Sanders.	1.00	545.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
6/16/2021	AM2	Attention to tolling agreements and communicate with DA/FPPC re same.	0.25	136.25
6/17/2021	AM2	Prepare legal and factual information [REDACTED].	1.00	545.00
6/18/2021	AM2	Finalize update [REDACTED]; transmit to G. Sanders and C. Grace to review.	1.00	545.00
6/20/2021	AM2	Review C. Grace revision [REDACTED] Review case law [REDACTED].	0.50	272.50
6/21/2021	AM2	Finalize and transmit additional information to DA and FPPC.	0.25	136.25
6/28/2021	AM2	Attention to scheduling settlement meeting. Emails with G. Sanders and C. Grace [REDACTED].	0.50	272.50
6/28/2021	GWS	Review email from Amber Maltbie [REDACTED]; respond.	0.25	150.00
7/1/2021	AM2	Joint call with DA/FPPC. Prepare for and attention to follow up from same.	2.25	1,226.25
7/1/2021	GWS	Prepare for telephone conference with DDA Ken Jorgensen and Amber Maltbie; participate in telephone conference.	1.00	600.00
7/6/2021	AM2	Prepare email memo to C. Grace [REDACTED].	1.50	817.50
7/6/2021	GWS	Review updated [REDACTED].	0.25	150.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
7/7/2021	AM2	Conference call with C. Grace and G. Sanders [REDACTED] [REDACTED]; continued research i [REDACTED].	0.50	272.50
7/8/2021	AM2	Conference call with C. Grace and G. Sanders [REDACTED] [REDACTED]; continued research [REDACTED].	2.75	1,498.75
7/8/2021	GWS	Conference call with Charlie Grace and Amber Maltbie [REDACTED].	0.75	450.00
7/9/2021	GWS	Review several emails from Charles Grace [REDACTED] [REDACTED].	0.25	150.00
7/12/2021	AM2	Attention to materials, articles and letters [REDACTED] [REDACTED].	0.25	136.25
7/14/2021	AM2	Conference call with C. Grace [REDACTED] [REDACTED].	1.50	817.50
7/14/2021	GWS	Review email [REDACTED] [REDACTED]; respond to Amber Maltbie.	0.25	150.00
7/16/2021	AM2	Attention to follow up inquiry from K. Jorgenson and respond to same.	0.50	272.50
7/19/2021	AM2	Attention to [REDACTED] [REDACTED].	0.25	136.25

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
7/19/2021	GWS	Review email from Charlie Grace r [REDACTED] [REDACTED]	0.25	150.00
7/20/2021	AM2	Review [REDACTED] responses and email follow up question to C. Grace. Review [REDACTED] [REDACTED]	0.50	272.50
7/22/2021	AM2	Correspond with DA and C. Grace [REDACTED]	0.25	136.25
7/23/2021	AM2	Respond to email from G. Sanders [REDACTED] [REDACTED]	0.25	136.25
7/30/2021	AM2	Initial review [REDACTED]. Correspond with C. Grace.	0.25	136.25
7/31/2021	AM2	Analysis of and respond [REDACTED] [REDACTED]	0.75	408.75
8/2/2021	AM2	Attention to correspondence from DA [REDACTED] [REDACTED]; email to C. Grace [REDACTED]	0.25	136.25
8/3/2021	AM2	Correspond with DA re status of information request.	0.25	136.25
8/4/2021	AM2	Follow up with C. Grace [REDACTED]	0.25	136.25
8/5/2021	AM2	Correspond with DA re insurance; attention to response.	0.25	136.25
8/11/2021	AM2	Review and analysis [REDACTED].	2.00	1,090.00
8/11/2021	GWS	Review and analyze [REDACTED].	1.25	750.00
8/13/2021	AM2	Call with C. Grace and G. Sanders [REDACTED] [REDACTED]; listen to portion of SSCSD board meeting.	1.50	817.50
8/13/2021	GWS	Telephone conference with Charles Grace and Amber Maltbie [REDACTED].	1.00	600.00
8/15/2021	AM2	Analysis of [REDACTED] [REDACTED]; [REDACTED] g.	0.50	272.50

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
8/16/2021	AM2	Call with C. Grace [REDACTED]. Attention to prior FPPC enforcement actions [REDACTED].	1.25	681.25
8/17/2021	AM2	Respond to C. Grace [REDACTED].	0.25	136.25
8/19/2021	AM2	Research [REDACTED]; confirm [REDACTED]. Call with C. Grace re same.	1.00	545.00
8/20/2021	AM2	Attention to [REDACTED] FPPC proposed stipulated settlement.	0.50	272.50
8/22/2021	AM2	Legal analysis of claims [REDACTED]. prepare outline [REDACTED]. Attention to C. Grace's comments [REDACTED].	2.50	1,362.50
8/23/2021	AM2	Call with insurance broker [REDACTED].	1.00	545.00
8/24/2021	AM2	Redline changes to FPPC stipulated settlement; research [REDACTED].	1.00	545.00
8/25/2021	AM2	Review C. Grace's redlines.	0.25	136.25
8/25/2021	AM2	Conference call with C. Grace [REDACTED].	1.50	817.50
8/26/2021	AM2	Finalize FPPC redlines and prepare transmittal language.	1.00	545.00
8/27/2021	AM2	[REDACTED]; internal email [REDACTED]. Finalize FPPC response and transmit to T. Gilbertson.	0.50	272.50
8/27/2021	JNJ1	Briefly research scope [REDACTED].	1.25	656.25

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
8/31/2021	AM2	Finalize analysis [REDACTED] transmit outline of same to G. Sanders and C. Grace. Correspond with C. Grace and FPPC [REDACTED] [REDACTED]	3.25	1,771.25
9/1/2021	AM2	Correspond with FPPC and C. Grace [REDACTED] [REDACTED]	0.25	136.25
9/3/2021	AM2	Attention to DA letter [REDACTED] [REDACTED].	0.25	136.25
9/8/2021	AM2	Review FPPC revised agreement and emails/calls with C. Grace re same. A [REDACTED] [REDACTED]. Prepare outline [REDACTED]	1.75	953.75
9/9/2021	AM2	Strategy call with C. Grace and G. Sanders r [REDACTED] [REDACTED]	1.50	817.50
9/9/2021	GWS	Conference call with Charles Grace and Amber Maltbie.	1.00	600.00
9/10/2021	AM2	Coordinate call with SLO DA; internal communication with G. Sanders [REDACTED]	0.25	136.25
9/13/2021	AM2	Review [REDACTED] and advice [REDACTED]	0.25	136.25
9/14/2021	AM2	Conference call with G. Sanders and J. Minnery [REDACTED] [REDACTED]	0.50	272.50
9/14/2021	GWS	Prepare for conference call with Jeff Minnery and Amber Maltbie r [REDACTED] [REDACTED] participate in conference call.	0.75	450.00
9/15/2021	AM2	Review [REDACTED]	0.25	136.25
9/16/2021	AM2	Settlement conference with G. Sanders and DA Jorgensen; prepare for same.	4.50	2,452.50

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
9/16/2021	GWS	Prepare for telephone conference with Deputy District Attorney Ken Jorgensen and Amber Maltbie [REDACTED]; participate in telephone conference; follow-up telephone conference with Charles Grace.	1.25	750.00
9/17/2021	AM2	Review [REDACTED]; follow up from call to K. Jorgensen [REDACTED]	0.75	408.75
9/17/2021	GWS	Review and analyze [REDACTED] email [REDACTED].	0.25	150.00
9/20/2021	AM2	Attention to finalizing FPPC action with payment.	0.25	136.25
9/20/2021	GWS	Review [REDACTED]	0.25	150.00
9/22/2021	AM2	Review [REDACTED] and call with G. Sanders [REDACTED]	0.25	136.25
9/22/2021	GWS	Telephone conference with Amber Maltbie [REDACTED].	0.50	300.00
9/22/2021	GWS	Review and analyze [REDACTED]; draft email to Charles Grace and Amber Maltbie.	0.25	150.00
9/23/2021	AM2	Review amendment a [REDACTED]; [REDACTED]; call with C Grace [REDACTED]	0.50	272.50
9/23/2021	GWS	Review emails [REDACTED]	0.25	150.00
9/23/2021	GWS	Draft email to Jeff Minnery [REDACTED].	0.25	150.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
9/24/2021	AM2	Call with C. Grace [REDACTED] begin drafting [REDACTED]	1.50	817.50
9/26/2021	AM2	Continue drafting letter [REDACTED]	0.50	272.50
9/27/2021	AM2	Continued attention to drafting letter [REDACTED] call with C. Grace [REDACTED]	2.25	1,226.25
9/27/2021	GWS	Prepare for conference call with Charlie Grace: participate in conference call.	0.75	450.00
9/27/2021	GWS	Review [REDACTED]; draft comments to Charles Grace; review opinion [REDACTED].	0.25	150.00
9/28/2021	AM2	Prepare [REDACTED]. Review civil complaint. Attend aborted board meeting.	2.75	1,498.75
9/28/2021	GWS	Review file and prepare for [REDACTED].	0.50	300.00
9/28/2021	GWS	Telephone conference [REDACTED]	1.25	750.00
9/28/2021	GWS	Review and analyze District Attorney civil complaint against Charles Grace and GES; telephone conference with Charles Grace.	0.50	300.00
9/28/2021	GWS	Review draft [REDACTED]; draft email to Amber Maltbie.	0.25	150.00
9/29/2021	AM2	Finalize and transmit PRA. Research [REDACTED]. Attention to articles.	1.00	545.00
10/1/2021	AM2	Attention to new PRA request [REDACTED]	0.25	136.25

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
10/3/2021	AM2	Listen to [REDACTED] [REDACTED].	0.75	408.75
10/4/2021	AM2	Emails with J. Meeker [REDACTED] [REDACTED]s.	0.25	136.25
10/5/2021	AM2	Review contract bullet points and comment on same. Follow up correspondence with C. Grace [REDACTED] [REDACTED].	0.50	272.50
10/5/2021	GWS	Review and analyze email correspondence from Jeff Minnery [REDACTED] [REDACTED].	0.25	150.00
10/6/2021	GWS	Telephone conference with Jeff Minnery [REDACTED] [REDACTED].	0.75	450.00
10/8/2021	AM2	Begin reviewing [REDACTED] [REDACTED]; attention to contract revisions.	0.25	136.25
10/10/2021	AM2	Review contract amendment and restatement; call with G. Sanders [REDACTED]; analysis of [REDACTED] case law [REDACTED] [REDACTED].	1.00	545.00
10/10/2021	GWS	Review and analyze draft SSCSD/GES contract amendments; [REDACTED] [REDACTED].	2.75	1,650.00
10/11/2021	AM2	Begin reviewing [REDACTED] [REDACTED] A.	0.50	272.50
10/11/2021	GWS	Telephone conference with Jeff Minnery [REDACTED] [REDACTED].	0.25	150.00
10/12/2021	AM2	Review DA's response [REDACTED]	0.25	136.25

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
10/12/2021	AM2	Review DA's response to CPRA request. Email to G. Sanders and C. Grace [REDACTED]	0.25	136.25
10/12/2021	GWS	Review and analyze GES liability insurance policies.	1.00	600.00
10/12/2021	GWS	Draft email to Jennifer Meeker [REDACTED].	0.25	150.00
10/13/2021	AM2	Finalize and transmit [REDACTED].	0.50	272.50
10/14/2021	JLM1	Review 100+ page complaint and liability policy [REDACTED]	4.00	2,300.00
10/18/2021	AM2	Initial review and analysis of FPPC complaint; email to G. Sanders and C. Grace re same.	0.50	272.50
10/20/2021	AM2	Review public comments; correspond with C. Grace and G. Sanders re same.	0.25	136.25
10/21/2021	AM2	Prepare for and attend FPPC meeting; debrief to C. Grace and G. Sanders [REDACTED]. Watch video portion of commissioner instruction to staff [REDACTED]	4.00	2,180.00
10/21/2021	GWS	Review and analyze summary of FPPC proceedings; respond.	0.25	150.00
10/22/2021	AM2	Review FPPC revisions to stipulation; analysis of [REDACTED]; email to C. Grace and G. Sanders [REDACTED].	1.00	545.00
10/23/2021	AM2	Continued attention to drafting complaint response and amending stipulation language; call with C. Grace [REDACTED]	1.50	817.50
10/24/2021	AM2	Continue drafting complaint response.	0.50	272.50
10/25/2021	AM2	Calls with C. Grace and T. Gilbertson [REDACTED]. Draft revisions [REDACTED]. Begin preparing [REDACTED].	2.75	1,498.75

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
10/25/2021	GWS	Review and analyze [REDACTED]; review [REDACTED]	0.25	150.00
10/25/2021	GWS	Review and analyze draft response [REDACTED]	0.25	150.00
10/25/2021	GWS	Review FPPC complaint lodged by Hank Krzciuk.	0.25	150.00
10/26/2021	AM2	Respond to G. Sanders re [REDACTED]. Continue drafting [REDACTED].	1.25	681.25
10/26/2021	GWS	Review and analyze [REDACTED]	0.25	150.00
10/27/2021	AM2	Review response [REDACTED]; finalize draft [REDACTED]; follow up with G. Sanders and C. Grace re [REDACTED]. Respond to several emails [REDACTED].	2.75	1,498.75
10/27/2021	GWS	Review and analyze [REDACTED].	0.25	150.00
10/27/2021	GWS	Review, revise and edit indemnification letter to San Simeon Community Services District General Counsel.	0.25	150.00
10/28/2021	AM2	Finalize T [REDACTED]; correspond with C. Grace and G. Sanders [REDACTED]. Transmit to [REDACTED].	1.00	545.00
10/28/2021	GWS	Review final draft [REDACTED].	0.25	150.00
10/29/2021	AM2	Review FPPC revisions to stipulation language; email to C. Grace and G. Sanders [REDACTED].	0.25	136.25

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
10/29/2021	GWS	Review and analyze revised FPPC stipulation; further review [REDACTED].	0.50	300.00
10/30/2021	AM2	Transmit ethics training certificate to T. Gilbertson.	0.25	136.25
11/1/2021	AM2	Finalize coordination/transmittal of FPPC settlement docs to T. Gilbertson.	0.25	136.25
11/1/2021	GWS	Review email [REDACTED].	2.50	1,500.00
11/2/2021	GWS	Review form letter [REDACTED].	0.25	150.00
11/2/2021	GWS	Review comments on form letter [REDACTED]; respond.	0.25	150.00
11/3/2021	AM2	Prepare [REDACTED]. Review edits [REDACTED].	0.50	272.50
11/4/2021	GWS	Draft email [REDACTED].	0.25	150.00
11/4/2021	GWS	Review email [REDACTED].	0.25	150.00
11/5/2021	AM2	Call with C. Grace [REDACTED].	0.25	136.25
11/8/2021	AM2	Call with G. Sanders [REDACTED]. Prepare response [REDACTED]. Review supplemental material provided and email to FPPC [REDACTED].	1.25	681.25
11/8/2021	GWS	Review additional information [REDACTED].	0.25	150.00
11/8/2021	GWS	Telephone conference with Amber Maltbie [REDACTED].	0.25	150.00
11/8/2021	GWS	Review FPPC agenda and supporting letters.	0.25	150.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
11/9/2021	AM2	Correspond [REDACTED]; emails with C. Grace re same; follow up [REDACTED]. Review FPPC public comments relating to 11/18 item.	0.50	272.50
11/9/2021	GWS	Review comments [REDACTED].	0.25	150.00
11/9/2021	GWS	Review email from Amber Maltbie [REDACTED]; respond.	0.25	150.00
11/9/2021	GWS	Review draft response [REDACTED]	0.25	150.00
11/11/2021	AM2	Review public comment letter [REDACTED] comment on same.	0.25	136.25
11/11/2021	GWS	Review and analyze draft support letter [REDACTED] r.; draft email [REDACTED]	0.25	150.00
11/14/2021	AM2	Internal email to G. Sanders [REDACTED]	0.25	136.25
11/15/2021	GWS	Review email [REDACTED]; respond.	0.25	150.00
11/16/2021	AM2	Attention to complaint; strategize [REDACTED] C; finalize and transmit [REDACTED]; internal outreach [REDACTED]. Call with C. Grace [REDACTED]	1.50	817.50
11/16/2021	GWS	Review [REDACTED].	0.25	150.00
11/17/2021	AM2	Attention to public comments.	0.25	136.25
11/17/2021	GWS	Review and analyze [REDACTED].	0.25	150.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
11/17/2021	GWS	Review Rules of Court [REDACTED]; review [REDACTED] e [REDACTED]; draft email to Amber Maltbie.	0.75	450.00
11/18/2021	AM2	Attend FPPC meeting and provide updates to C. Grace and G. Sanders [REDACTED]. Send update to [REDACTED]. Re- watch video to confirm direction from chair [REDACTED].	1.75	953.75
11/19/2021	GWS	Telephone conference with Charles Grace [REDACTED] [REDACTED].	0.25	150.00
11/22/2021	AM2	Internal conference call [REDACTED] [REDACTED]; review FPPC response [REDACTED]	0.75	408.75
11/22/2021	GWS	Telephone conference with John Flynn and Amber Maltbie [REDACTED].	0.25	150.00
11/22/2021	GWS	Telephone conference [REDACTED] [REDACTED]; telephone conference with Charles Grace.	0.50	300.00
11/22/2021	JJF	Review and analyze civil complaint filed by DA's office; review related emails; conference call with G. Sanders and A. Maltbie.	1.00	785.00
11/23/2021	AM2	Internal emails [REDACTED] [REDACTED].	0.50	272.50
11/23/2021	GP1	Strategize with J. Flynn r [REDACTED] [REDACTED].	0.50	192.50

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
11/23/2021	JJF	Review and analyze emails [REDACTED] [REDACTED] h; conference call with G. Perez [REDACTED] [REDACTED].	0.75	588.75
11/24/2021	AM2	Emails with G. Perez [REDACTED] [REDACTED] t.	0.25	136.25
11/24/2021	GP1	Review complaint, all case opening documents, and prior communications with the District Attorney's office [REDACTED] [REDACTED] [REDACTED].	1.00	385.00
11/24/2021	GP1	Review California Rules of Court t [REDACTED] [REDACTED].	0.25	96.25
11/24/2021	GP1	Review California Code of Civil Procedure [REDACTED] [REDACTED] t.	0.25	96.25
11/29/2021	JJF	Review emails [REDACTED]; prepare for 11-30 conference call.	0.50	392.50
11/30/2021	AM2	Confirm [REDACTED] [REDACTED] Strategy conference call.	0.50	272.50
11/30/2021	GP1	Conference call with C. Grace, J. Flynn, A. Maltbie, and G. Sanders [REDACTED] [REDACTED].	0.50	192.50
11/30/2021	GP1	Strategize with J. Flynn r [REDACTED] [REDACTED] [REDACTED].	0.25	96.25

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
11/30/2021	GWS	Telephone conference with Charles Grace [REDACTED]	0.50	300.00
11/30/2021	JJF	Prepare for and participate in conference call with client [REDACTED] related conference call with G. Perez.	1.00	785.00
12/1/2021	GWS	Review various emails from Charles Grace.	0.25	150.00
12/2/2021	GWS	Review FPPC rejection of Julie Tacker 1090 complaint.	0.25	150.00
12/3/2021	AM2	Analysis [REDACTED]; prepare and transmit CPRA request to FPPC; call with C, Grace [REDACTED].	2.00	1,090.00
12/6/2021	AM2	Execute and transmit Notice of Acknowledgement.	0.25	136.25
12/6/2021	GP1	Review Notice and Acknowledgment of Receipt and email from District Attorney's office regarding same.	0.25	96.25
12/6/2021	JJF	Review e-mails [REDACTED].	0.25	196.25
12/8/2021	GWS	Review legal invoices [REDACTED]; draft email to Charles Grace and Amber Maltbie.	1.00	600.00
12/10/2021	AM2	[REDACTED]; review [REDACTED] request for advice from FPPC.	0.25	136.25
12/10/2021	GWS	Review [REDACTED] cease and desist letter; transmit email to Charles Grace.	0.25	150.00
12/13/2021	AM2	Analysis [REDACTED]; email to C. Grace re same.	0.50	272.50
12/14/2021	AM2	Review and forward FPPC response to CPRA request.	0.25	136.25
12/15/2021	AM2	Correspond [REDACTED].	0.25	136.25

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
12/15/2021	GWS	Review and analyze [REDACTED] email [REDACTED] [REDACTED]	0.25	150.00
12/15/2021	JJF	Review email from G. Sanders [REDACTED] [REDACTED]	0.25	196.25
12/17/2021	GP1	Strategize [REDACTED] [REDACTED]	0.25	96.25
12/17/2021	GWS	Draft email to John Flynn [REDACTED] [REDACTED]; review response [REDACTED].	0.25	150.00
12/17/2021	GWS	Respond to Amber Maltbie email [REDACTED] [REDACTED]	0.25	150.00
12/20/2021	AM2	Begin reviewing time entries for submitting request for indemnification; review letters [REDACTED]; call with C. Grace [REDACTED]. Begin drafting [REDACTED].	1.50	817.50
12/21/2021	AM2	Outreach to K. Jorgensen re extending response time; internal email to G. Perez and J. Flynn re CMC.	0.50	272.50
12/21/2021	GP1	Review emails [REDACTED] [REDACTED]	0.25	96.25
12/21/2021	GP1	Review case docket to confirm upcoming hearings.	0.25	96.25
12/21/2021	GWS	Review emails (3x) from John Flynn [REDACTED] [REDACTED]; respond to emails.	0.25	150.00
12/21/2021	GWS	Draft email to Amber Maltbie and John Flynn [REDACTED] [REDACTED].	0.25	150.00
12/21/2021	JJF	Review emails [REDACTED] [REDACTED].	0.25	196.25

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
12/28/2021	AM2	Review responsive documents to CPRA request; call with C Grace [REDACTED].	0.50	272.50
12/31/2021	AM2	Review staff report and board meeting video [REDACTED]; email to C. Grace re same.	0.50	272.50
1/3/2022	AM2	Initial review of FPPC complaint filed by J. Tacker; email to C. Grace re same.	0.25	136.25
1/3/2022	GWS	Review and analyze FPPC complaint filed by Julie Tacker.	0.25	150.00
1/7/2022	AM2	Letter to [REDACTED]; call with FPPC [REDACTED].	0.50	272.50
1/10/2022	AM2	Finalize plain language summary [REDACTED]; update to G. Sanders and C. Grace [REDACTED]. Review letter [REDACTED].	1.00	545.00
1/10/2022	GP1	Review Standing Order for Department 2, begin review of complaint in preparation for [REDACTED].	0.50	207.50
1/11/2022	AM2	Compile notes and research [REDACTED]; update and re-transmit [REDACTED].	0.50	272.50
1/11/2022	GP1	Review the department's Standing Order and rules [REDACTED] draft the case management statement, including review of complaint to draft same.	1.00	415.00
1/11/2022	GWS	Telephone conference with Charles Grace [REDACTED].	0.50	300.00
1/11/2022	GWS	Review summary of FPPC enforcement action [REDACTED].	0.25	150.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
1/11/2022	JJF	Review, analyze and response to emails [REDACTED] [REDACTED]	0.75	611.25
1/12/2022	AM2	Conference with G. Sanders, G. Perez, and J. [REDACTED] [REDACTED]. Prepare notes for same.	1.25	681.25
1/12/2022	JJF	Prepare for and participate in conference call with G. Sanders, A. Maltbie and G. Perez [REDACTED]	1.00	815.00
1/13/2022	AM2	Internal correspondence [REDACTED] [REDACTED]; respond to C. Grace [REDACTED]	0.25	136.25
1/14/2022	AM2	Continue analysis [REDACTED] [REDACTED]. Outreach to K. Jorgensen and internal emails re same.	1.25	681.25
1/14/2022	AM2	Attention to Tacker complaint. [REDACTED] [REDACTED]	0.50	272.50
1/14/2022	GWS	Review social media posting [REDACTED]	0.25	150.00
1/14/2022	GWS	Review FPPC letter [REDACTED] [REDACTED]	0.25	150.00
1/14/2022	GWS	Email correspondence with Amber Maltbie [REDACTED] [REDACTED]	0.25	150.00
1/14/2022	JJF	Review emails [REDACTED]; conference between J. Flynn and G. Perez [REDACTED]	0.50	407.50
1/15/2022	AM2	Continued review of civil complaint [REDACTED] [REDACTED]r.	1.25	681.25
1/17/2022	AM2	Finalize and transmit comments on civil complaint to G. Perez.	1.00	545.00
1/17/2022	AM2	Prepare response to FPPC complaint; research [REDACTED] [REDACTED]	2.00	1,090.00
1/17/2022	GWS	Review and analyze [REDACTED] [REDACTED].	0.25	150.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
1/17/2022	GWS	Review and analyze [REDACTED] response [REDACTED].	0.25	150.00
1/17/2022	GWS	Review and analyze [REDACTED] response [REDACTED].	0.25	150.00
1/17/2022	GWS	Research re [REDACTED].	2.50	1,500.00
1/18/2022	AM2	Finalize draft FPPC response and email to G. Sanders and C. Grace. Call with C. Grace [REDACTED]. Finalize and transmit to FPPC.	3.25	1,771.25
1/18/2022	AM2	Attention to email [REDACTED].	0.25	136.25
1/18/2022	GP1	Review and reply to various emails from K. Jorgensen regarding meeting and conferring for the upcoming Case Management Conference, [REDACTED].	0.25	103.75
1/18/2022	GP1	Draft emails to K. Jorgensen regarding extension of time to file answer to complaint, [REDACTED].	0.75	311.25
1/18/2022	GP1	Review California statutes and practice guides [REDACTED], and strategize regarding same.	0.50	207.50
1/18/2022	GWS	Review and analyze draft response [REDACTED].	0.25	150.00
1/18/2022	GWS	Review and analyze [REDACTED].	0.25	150.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
1/18/2022	JJF	Review emails [REDACTED]; conference between J. Flynn and G. Perez	0.25	203.75
1/19/2022	GWS	Review email from Charles Grace [REDACTED]	0.25	150.00
1/19/2022	GWS	Review FPPC letter rejecting Julie Tacker complaint.	0.25	150.00
1/20/2022	AM2	Review and categorize invoices for claim/reimbursement. Attention to internal correspondence with team [REDACTED]	1.25	681.25
1/20/2022	GP1	Prepare for and attend telephonic meet and confer with K. Jorgensen, Deputy District Attorney, and revise case management statement based on meet and confer.	1.25	518.75
1/20/2022	GP1	Review and analyze California case law [REDACTED]	0.50	207.50
1/20/2022	GP1	Review the State of California's case management statement.	0.25	103.75
1/20/2022	GWS	Review and analyze updated [REDACTED]	0.25	150.00
1/20/2022	GWS	Review and analyze Case Management Statement filed by Deputy District Attorney Ken Jorgensen; draft three emails to John Flynn, Amber Maltbie and Gabby Perez [REDACTED]; draft potential revisions to Case Management statement.	2.75	1,650.00
1/20/2022	JJF	Prepare for meet and confer with Deputy District Attorney Jorgensen re case management conference; participate in conference call with G. Perez and Deputy DA Jorgensen.	1.75	1,426.25

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
1/21/2022	AM2	Finalize analysis of time sheets for indemnification claim.	1.50	817.50
1/21/2022	AM2	Review and comment [REDACTED]	0.25	136.25
1/21/2022	GP1	Strategize [REDACTED], finalize and coordinate [REDACTED].	0.75	311.25
1/21/2022	GP1	Draft, finalize, and oversee filing and service of consent for electronic service form.	0.25	103.75
1/21/2022	GWS	Telephone conference with John Flynn [REDACTED]	0.75	450.00
1/21/2022	GWS	Review and analyze revisions to Case Management Statement.	0.25	150.00
1/21/2022	GWS	Review compilation of data f [REDACTED]	0.25	150.00
1/21/2022	JJF	Conference with G. Perez and G. Sanders [REDACTED]	1.00	815.00
1/24/2022	GWS	Review email/letter [REDACTED].	0.25	150.00
1/25/2022	GP1	Review complaint, including exhibits, and begin drafting [REDACTED]	6.50	2,697.50
1/25/2022	GWS	Draft letter [REDACTED]	0.25	150.00
1/26/2022	AM2	Review prebill f [REDACTED]; organize 3 complaints [REDACTED].	0.50	272.50

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
1/26/2022	GP1	Review complaint, including exhibits, and draft verified answer [REDACTED]	9.75	4,046.25
1/26/2022	GWS	Review email from Amber Maltbie [REDACTED]; respond.	0.25	150.00
1/26/2022	KH1	Download video and audio files [REDACTED]	0.50	162.50
1/27/2022	AM2	Call with G. Perez [REDACTED]	1.50	817.50
1/27/2022	GP1	Review [REDACTED], and revise [REDACTED].	0.75	311.25
1/27/2022	GP1	Conference call with A. Maltbie [REDACTED], e, incorporate same to draft verified answer.	1.25	518.75
1/27/2022	GP1	Review California cases and practice guides [REDACTED], and revise verified answer to include same.	1.75	726.25
1/27/2022	GP1	Review practice guides regarding [REDACTED].	2.25	933.75
1/27/2022	GWS	Review Court order continuing Case Management Conference to May 11, 2022.	0.25	150.00
1/27/2022	GWS	Review final draft answer [REDACTED].	0.75	450.00
1/27/2022	JJF	Review and revise [REDACTED].	0.25	203.75

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
1/28/2022	AM2	Finalize review and comments of civil complaint answer; conference with G. Perez re same.	1.50	817.50
1/28/2022	GP1	Finalize and coordinate service and filing of verified answer, [REDACTED].	3.00	1,245.00
1/28/2022	JJF	Conferences with G. Perez [REDACTED].	0.25	203.75
2/1/2022	AM2	Review board correspondence [REDACTED].	0.25	136.25
2/2/2022	AM2	Finalize indemnification costs analysis; prepare request letter and support materials.	1.00	545.00
2/2/2022	GWS	Review draft transmittal letter to Jeff Minnery [REDACTED].	0.25	150.00
2/2/2022	JJF	Review and analyze email from assistant District Attorney Jorgensen re plans for demurrer to answer; various related internal emails [REDACTED]; conference between G. Sanders and J. Flynn [REDACTED].	0.75	611.25
2/3/2022	AM2	Continued attention to preparing indemnification request.	0.75	408.75
2/3/2022	GP1	Review K. Jorgensen's email requesting meet and confer as to the answer, and [REDACTED].	0.50	207.50
2/3/2022	JJF	Conference call with G. Perez [REDACTED]; related email to K. Jorgensen [REDACTED]; review responses thereto; related internal emails.	0.75	611.25
2/4/2022	AM2	Finalize supporting materials [REDACTED].	0.25	136.25
2/4/2022	GWS	Review and analyze [REDACTED]; draft email to Amber Maltbie.	0.25	150.00
2/4/2022	GWS	Review [REDACTED].	0.25	150.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
2/4/2022	JJF	Prepare for and participate in conference call with Mr. Grace and G. Sanders [REDACTED]; review emails [REDACTED].	0.75	611.25
2/8/2022	GWS	Telephone conference with John Flynn.	0.50	300.00
2/14/2022	AM2	Finalize and transmit indemnification request letter [REDACTED].	0.25	136.25
2/14/2022	GP1	Review emails from K. Jorgensen regarding meeting and conferring as to the verified answer and begin coordinating [REDACTED].	0.25	103.75
2/15/2022	GP1	Review K. Jorgensen's meet and confer email regarding the demurrer to Defendant's answer.	0.25	103.75
2/22/2022	AM2	Attention to email from J. Minnery and emails with C. Grace and G. Sanders [REDACTED].	0.25	136.25
2/28/2022	AM2	Redact invoices [REDACTED].	1.50	817.50
3/1/2022	AM2	Edit and finalize redacted narratives [REDACTED]; call with J. Minnery [REDACTED].	0.25	136.25
3/2/2022	GP1	Review emails from K. Jorgensen regarding extension to file demurrer to Defendant's answer and timing of mandatory settlement conference.	0.25	103.75
3/2/2022	GP1	Review subpoenas to third parties.	0.25	103.75
3/7/2022	GWS	Review email from Charles Grace [REDACTED]; telephone conference with Charles Grace; draft emails [REDACTED]; review voicemail [REDACTED].	0.75	450.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
3/7/2022	JJF	Conference with G. Sanders [REDACTED] [REDACTED].	0.25	203.75
3/8/2022	AM2	Review email [REDACTED] [REDACTED]; listen to FPPC meeting [REDACTED].	0.25	136.25
3/9/2022	GWS	Review email regarding FPPC opinion [REDACTED] [REDACTED].	0.25	150.00
3/9/2022	GWS	Review SSCSD video [REDACTED] [REDACTED].	0.25	150.00
3/15/2022	JJF	Review settlement conference procedures [REDACTED] [REDACTED]; conference call with Clerk of Court; email [REDACTED]; related call [REDACTED].	0.75	611.25
3/17/2022	JJF	Email exchanges with opposing counsel re mandatory settlement conference; conference with S. Davidovicz [REDACTED]; internal emails [REDACTED].	0.50	407.50
3/18/2022	GWS	Telephone conference with John Flynn and Shir Davidovicz [REDACTED].	0.50	300.00
3/21/2022	GWS	Review resume of John Trice for consideration as settlement judge; review additional judicial resumes; consider referral to JAMS; calculate cost of JAMS mediation.	1.25	750.00
3/21/2022	JJF	Telephone calls re availability of retired Judge John Trice for MSC; related emails [REDACTED].	0.50	407.50
3/22/2022	JJF	Continue search for MSC judge.	0.25	203.75
4/1/2022	AM2	Review additional letters [REDACTED] [REDACTED].	0.25	136.25
4/1/2022	JJF	Continue search for MSC judge.	0.25	203.75

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
4/5/2022	AM2	Transmit email [REDACTED]	0.25	136.25
4/11/2022	JJF	Conferences with S. Dadidovicz [REDACTED]; related internal emails.	0.50	407.50
4/11/2022	SD2	Reaching out to Judge LaBarbera's staff [REDACTED]	1.00	435.00
4/12/2022	JJF	Review status of search for MSC Judge.	0.25	203.75
4/13/2022	GWS	Review email [REDACTED]; respond.	0.25	150.00
4/13/2022	JJF	Email exchanges [REDACTED]	0.25	203.75
4/13/2022	SD2	Attempting to get in contact with Judge LaBarbera regarding his availability and ability to sit as an MSC Judge by assignment.	0.25	108.75
4/19/2022	GWS	Review email from John Flynn [REDACTED]; respond.	0.25	150.00
4/19/2022	SD2	Contacting Superior Court staff to confirm whether Judge LaBarbera's availability to sit as an MSC Judge by assignment.	0.25	108.75
4/20/2022	JJF	Email exchanges re mandatory settlement conference [REDACTED]	0.25	203.75
4/26/2022	AM2	Respond to question [REDACTED]	0.25	136.25
4/26/2022	GWS	Draft email to Charles Grace regarding status of matters.	0.25	150.00
4/26/2022	GWS	Review email [REDACTED]; respond.	0.25	150.00
4/18/2022	SDL	Test [REDACTED]	1.00	545.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
5/2/2022	GWS	Review email from Deputy DA Ken Jorgensen regarding scheduling of settlement judge; respond.	0.25	150.00
5/2/2022	JJF	Review emails [REDACTED]; conferences [REDACTED].	0.50	407.50
5/2/2022	SD2	Preparing supplemental Case Management Conference Statement [REDACTED].	2.00	870.00
5/9/2022	JJF	Prepare for case management conference; related emails.	0.25	203.75
5/9/2022	SD2	Reviewing CMC Statements [REDACTED].	0.25	108.75
5/10/2022	JJF	Prepare for 5-11 case management conference.	0.25	203.75
5/11/2022	JJF	Prepare for and appear at case management conference; follow-up conversation [REDACTED].	1.25	1,018.75
5/12/2022	JJF	Conference [REDACTED]; related email exchange with K. Jorgensen, attorney for plaintiff.	0.25	203.75
5/13/2022	JJF	Email exchanges with attorney for plaintiff re dates for voluntary settlement conference.	0.25	203.75
5/17/2022	AM2	Consolidate and review inquiry and response letters [REDACTED].	1.75	953.75
5/17/2022	GWS	Review Amber Maltbie synopsis [REDACTED].	0.25	150.00

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
5/17/2022	JJF	Review email from A. Maltbie [REDACTED].	0.25	203.75
5/18/2022	AM2	Review email exchanges [REDACTED].	0.25	136.25
5/25/2022	AM2	Correspond [REDACTED].	0.25	136.25
5/25/2022	JJF	Review emails [REDACTED].	0.25	203.75
6/1/2022	JJF	Prepare for settlement conference [REDACTED].	0.50	300.00
6/2/2022	JJF	Prepare for 6-6 settlement conference [REDACTED].	0.50	300.00
6/3/2022	JJF	Preparation for 6-6 settlement conference [REDACTED].	1.00	600.00
6/4/2022	JJF	Comprehensive review and analysis [REDACTED]; related emails.	4.75	2,850.00
6/6/2022	AM2	Prepare for, attend, and debrief on settlement conference [REDACTED].	4.50	2,452.50
6/6/2022	GWS	Telephone conference with John Flynn regarding settlement conference with Ken Jorgensen.	0.25	150.00
6/6/2022	JJF	Prepare for and participate in conference call with opposing counsel re settlement; follow-up calls [REDACTED]; outline [REDACTED].	3.25	1,950.00
6/9/2022	GWS	Review and edit [REDACTED].	0.25	150.00
6/9/2022	JJF	Draft, review and revise [REDACTED]; review comment [REDACTED].	1.00	600.00
6/10/2022	AM2	Review and redline [REDACTED].	0.25	136.25

FPPC/SLO County DA Conflict of Interest Investigation

Date	Timekeeper	Description	Hours	Amount
6/10/2022	AM2	Review ██████████ to compare to ██████████.	0.25	136.25
6/10/2022	GWS	Review ██████████ edits to draft ██████████ t ██████████ draft email ██████████.	0.25	150.00
6/15/2022	AM2	Review and redline comments ██████████.	0.25	136.25
6/15/2022	GWS	Final review of ██████████; review proposed revisions ██████████.	0.25	150.00
6/15/2022	JJF	Review, revise and finalize letter ██████████ ██████████.	0.50	300.00
6/16/2022	JJF	Finalize and transmit ██████████ ██████████.	0.50	300.00
6/29/2022	GWS	Review response ██████████ ██████████.	0.25	150.00
6/29/2022	JJF	Review and analyze email ██████████ ██████████; review related internal emails; analyze ██████████.	0.50	300.00
6/30/2022	JJF	Review internal emails ██████████; related email to ██████████.	0.25	150.00

TOTAL

233,787.50