

STATE OF NEW MEXICO
COUNTY OF BERNALILLO
SECOND JUDICIAL DISTRICT

BURQUEMEDIA.COM,
ANDREW CHRISTOPHERSEN,
DINAH VARGAS,
STEVE KRAMER,

Plaintiffs,

vs.

No. D-202-CV-2015-09412

CITY OF ALBUQUERQUE, and
GORDON EDEN,

Defendants.

**COMPLAINT TO ENFORCE THE INSPECTION OF
PUBLIC RECORDS ACT, FOR PRODUCTION OF PUBLIC
RECORDS, AND FOR DAMAGES, COSTS AND ATTORNEYS' FEES**

Plaintiffs bring this action seeking the disclosure of public records pursuant the Inspection of Public Records Act, NMSA 1978 §14-2-12 (“IPRA”). Plaintiffs have requested lapel camera footage from the Albuquerque Police Department officers present at the scene of the fatal shooting of John Edward O’Keefe on January 13, 2015. Their requests were unlawfully denied. This action is brought pursuant to NMSA 1978 §14-2-12 to enforce the provisions of IPRA, NMSA 1978 §§14- 2-1 to -12 (1947, as amended through 2011). “It is...the public policy of this state that all persons are entitled to the greatest possible information regarding the affairs of government and the official acts of public officers and employees.” NMSA § 14-2-5. At no time is this policy more important than when our police officers use deadly force against citizens. To ensure public trust in government, people must have access to information about how our police, the officials charged with protecting the public, are using force against people. Body

worn cameras are the most accurate records of what occurs between police and citizens. It is crucial that these records are disclosed to the public as required by IPRA. Plaintiffs allege the following:

JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to NMSA 1978 § 14-2-12.
2. Venue is proper pursuant to NMSA 1978 § 38-3-1.

PARTIES

3. Plaintiff BurqueMedia.com is an Albuquerque media outlet. Stories about Albuquerque local government, local politicians, and local events are the primary subjects of BurqueMedia.com's articles. Incidents involving use of force by Albuquerque police officers are one topic on which BurqueMedia.com reports.
4. Plaintiff Andrew Christophersen is one of the founders and managers of BurqueMedia.com. He also writes articles for the website. Mr. Christopherhsen is an Albuquerque resident.
5. Plaintiff Dinah Vargas is one of the founders and managers of BurqueMedia.com. She also writes articles for the website. Ms. Vargas is an Albuquerque resident.
6. Plaintiff Steve Kramer is one of the founders and managers of BurqueMedia.com. He also writes articles for the website. Mr. Kramer is an Albuquerque resident.
7. Defendant City of Albuquerque is a municipality created by and operating under the laws of the State of New Mexico and oversees the Albuquerque Police Department (APD).
8. Gordon Eden is the Chief of Police for APD. In his role as Chief of Police, he oversees the records custodians and has ultimate responsibility for setting policy regarding the disclosure of public records.

9. At all times material to this complaint, Defendant Gordon Eden was acting within the scope of his employment and under color of state law.

FACTS

10. On January 13, 2015, John Edward O'Keefe was shot and killed by Albuquerque police officers.

11. Mr. O' Keefe was killed in a public alley way during the day near San Mateo and Constitution in Albuquerque, New Mexico.

12. Multiple officers were present during the shooting.

13. Neighbors witnessed the shooting.

14. On January 15, 2015, Plaintiff Andrew Christophersen, on behalf of BurqueMedia.com, submitted a request pursuant to IPRA, NMSA 1978 § 14-2-1 et. seq., requesting copies of "all lapel camera videos from APD officers pertaining to the shooting at San Mateo and Constitution on January 13, 2015." *See Exhibit 1*, attached.

15. The Office of the APD Records Custodian acknowledged receiving this request on January 16, 2015. *See Exhibit 2*, attached.

16. On February 5, 2015, APD denied most of Plaintiffs' request to inspect public records. *See Exhibit 3*, attached.

17. According to the response Defendants sent Plaintiffs' on February 5, 2015, "The records requested are confidential law enforcement records protected under NMSA 1978, § 14-2-1(A)(4) of the Inspection of Public Records Act. That video might seriously interfere with the effectiveness of a criminal investigation, while at the same time the release might also unfairly cast suspicion of [sic] innocent people." *See Exhibit 3*, attached.

18. Defendants deemed one responsive document non-exempt and offered to make it available to Plaintiffs. Defendants' response to Plaintiffs' request to inspect public records stated, "The City has searched, reviewed, and will now make available the responsive non-exempted document. Even though the investigation is on-going, we determined at least one responsive document was not exempt and therefore could be provided to you. As for any additional documents, we cannot permit inspection of those records because I, as APD custodian of records, have determined they are exempted from disclosure" due to NMSA § 14-2-1(A)(4). *See Exhibit 3*, attached.

19. On January 16, 2015, Defendants released some footage from one police officer's lapel camera to the media.

20. The video footage from this officer's lapel camera clearly shows several officers present at the scene of the shooting. The footage from their lapel cameras was not released.

21. On April 9, 2015, Plaintiff Andrew Christophersen sent an email to APD letting them know that releasing only one officer's lapel camera footage was not acceptable when he had requested all officers' lapel camera footage. *See Exhibit 4*, attached.

22. Later on April 9, 2015, APD Records Custodian Reynaldo Chavez stated that "[a]n exemption has been asserted. As you note that *you will not accept only a portion of the request* as we have afforded you the opportunity, your request will be closed." *See Exhibit 5*, attached (emphasis in original).

23. Reynaldo Chavez was placed on administrative leave later in April of 2015 and ultimately left APD.

24. Reynaldo Chavez then alleged that he was told by police chief Defendant Gordon Eden to find ways to deny public records requests. *See Exhibit 6*, attached.

25. Following Reynaldo Chavez's departure, on July 8, 2015, Plaintiffs Andrew Christophersen, Dinah Vargas, and Steve Kramer, on behalf of BurqueMedia.com, submitted another public records request for the video footage from the lapel cameras of all officers from the shooting of John Edward O'Keefe that occurred on January 13, 2015. *See Exhibit 7*, attached.

26. This request was sent nearly six months after Plaintiffs made their initial request for this lapel camera footage.

27. On July 13, APD denied Plaintiffs' request stating, "There is no responsive information available to your request. § 14-2-1(A)(4)." *See Exhibit 8*, attached.

28. This denial is pursuant to the law enforcement exception of IPRA, NMSA 1978, § 14-2-1(A)(4).

CLAIM FOR VIOLATION OF THE INSPECTION OF PUBLIC RECORDS ACT

29. Plaintiffs incorporate by reference the preceding paragraphs as though they were stated fully herein.

30. The Inspection of Public Records Act provides that "[e]very person has a right to inspect public records of this state". NMSA 1978, § 14-2-1.

31. Video footage from the lapel cameras worn by police officers constitutes public records as defined by IPRA. NMSA 1978, § 14-2-6 (G).

32. Video footage from the lapel cameras worn by police officers when John Edward O'Keefe was shot and killed by police does not fall under any exception to IPRA. NMSA 1978, § 14-2-1.

33. Defendants violated IPRA when they refused to provide the public records requested by Plaintiffs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that the Court to:

- A. Order Defendants to provide the requested public records to Plaintiffs;
- B. Award damages, costs and reasonable attorneys' fees to Plaintiffs; and
- C. Grant such other and further relief as to the Court seems proper.

Respectfully submitted,

/s/ Alexandra Freedman Smith

Alexandra Freedman Smith

Legal Director

ACLU of NM Foundation

P.O. Box 566

Albuquerque, NM 87103-0566

(505) 266-5915 Ext. 1008

F: (505) 266-5916

asmith@aclu-nm.org

Date: January 15, 2015

Via Email and Hand-Delivery

BurqueMedia.com
202 Harvard Dr SW 87016
Albuquerque New Mexico
(505) 363-8213
burquemediaproductions@gmail.com

Javier Urban
Acting APD Records Custodian/Central Records Supervisor
400 Roma NW 87102
Albuquerque New Mexico

Dear : Mr Urban,

This is a formal request under the New Mexico Inspection of Public Records Act ("IPRA") also known as the New Mexico Sunshine Law (NMSA 1978, Chapter 14, Article 2).

I am formally requesting a copy of: ALL Lapel camera videos from Officers involved pertaining to the shooting of John Edward O'Keefe near San Mateo and Constitution on January 13, 2015.

AS you are aware "'public records' means all documents, papers, letters, books, maps, tapes, photographs, recordings and other materials, regardless of physical form or characteristics, that are used, created, received, maintained or held by or on behalf of any public body and relate to public business, whether or not the records are required by law to be created or maintained." (14-2-6 NMSA 1978)

As you also know there has been no statutory exemption enacted that would pertain to these records. (14-2-1 NMSA 1978) You will also be further aware that according to the New Mexico Supreme Court "a citizen's right to know is the rule and secrecy is the exception."

Furthermore as clearly and explicitly set forth in the "Purpose of the act; declaration of public policy" (14-2-4 NMSA 1978) the New Mexico Legislature established that their intent was to ensure, by declaring it public policy, that all persons are entitled to the "greatest possible information regarding the affairs of government and the official acts of public officers and employees." The Legislature further unambiguously stated its intent and established as public policy that providing persons with such records "is an essential function of a representative government and an integral part of the routine duties of public officers and employees.(14-2-5 NMSA)

As the designated Public Records Custodian for the City you have an obligation to provide



reasonable access to copies of such public records "during usual business hours." (14-2-8 NMSA). And while, at maximum, the legislation provides a fifteen day period to provide records and a three day period upon receipt of the request to explain, in writing, when such records, if not provided prior to that date, the date when the request will be fulfilled - the clear intent of the Legislature is not to deem this maximum period as reasonable in all cases but only when necessary to fulfill the request. Otherwise the legislation requires records, that are readily at hand and easily produced, to be provided without unnecessary delay - or in other words - "immediately or as soon as is practicable under the circumstances." (14-2-8(D) NMSA)

This requirement for timely production becomes even more important when a record is either or both of great public interest and needed in a timely manner.

The records requested herein are already available with nothing to cause a minimal delay beyond the time it takes to make an electronic copy. Thus this request is clearly neither "excessively burdensome" nor "over broad" in nature.

Furthermore, by their very nature, it is without question these are records both in their entirety and in any and every portion thereof that is a non-exempt record covered under this law.

I am prepared to pay a reasonable cost for the duplication and CD or DVD for this request. The law requires "the actual costs associated with downloading copies of public records to a computer disk or storage device, including the actual cost of the computer disk or storage device" alone be assessed for these records. If that cost is to exceed the \$5 established by the City of Albuquerque's published policy for records fees that establishes that the cost for each CD or DVD is to be set at \$5 I request that you notify me immediately in writing (you can use the email listed herein for all communications to me pertaining to this request in order to ensure the most expedited process) as to the claimed cost and the legal basis upon which that fee has been established.

Although clearly there are no statutory exemptions for this record if you intend to claim such and thus to withhold either the whole or any portion of the records please notify me in writing as to the explicit statutory exemption being claimed and relied upon. Furthermore, if portions thereof are claimed exempt, please provide me those records that have no exemptions claimed prior to and at the first possible time and do not delay those portions until the other records, containing exemptions, are provided.

Given the public importance and interest in this record I request that you provide this record to me as soon as reasonably possible - no later than July 29, 2015. This time frame is consistent with the clear intent of the law as cited above. However - if you are unable to produce this record in that reasonable time frame - please notify me in writing as to the reason for the delay and the date when the record will be made available. Please contact me either by phone or email (provided herein) once the record is ready and I will pick it up from your office.

Thank you for your prompt attention to this matter. Again please contact via the phone or email provided herein if you have any questions regarding this request and provide any written responses via that email address listed above.

Sincerely,

Andrew Christophersen
Dinah Vargas

Steve Kramer
BurqueMedia.com
(505) 363-8213
burquemediaproductions@gmail.com

RECEIVED BY

DATE



"That which does not kill you will only make you stronger" Nietzsche

Confidentiality Notice: This e-mail, including all attachments, is for the sole use of the intended recipient (s) and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited unless specifically provided under the New Mexico Inspection of Public Records Act. If you are not the intended recipient, please contact the sender and destroy all copies of this message.

From: Torres, David L.

Sent: Friday, January 16, 2015 4:53 PM

To: 'achristophersen@hotmail.com'

Cc: Chavez, Reynaldo L. (chavezr@cabq.gov)

Subject: IPRA/MEDIA/BurqueMedia/Christophersen/Public Records Request/ALL Lapel camera videos from APD officers pertaining to the shooting at San Mateo and Constitution on January 13, 2015

Mr. Christophersen,

This email will acknowledge receipt of your public records request dated January 15th, 2014. Please be advised we are reviewing your request to determine what public records are responsive and whether any exceptions to their production apply. We will continue our review and contact you prior to the expiration of fifteen (15) days from the receipt of your request. Please do not hesitate to contact me if you have any questions or comments.

Please do not hesitate to contact me if you have any questions or comments.

Kind regards,

Office of the APD Records Custodian
Reynaldo Chavez
APD Records Custodian/IPRA Manager
400 Roma Avenue NW, Alb., NM 87102
Office (505) 768-2007
City Cell (505) 235-2160
FAX (505) 768-2540
chavezr@cabq.gov
rey_chavez@iCloud.com

From: Andrew Christophersen [<mailto:achristophersen@hotmail.com>]

Sent: Thursday, January 15, 2015 3:14 PM

To: Chavez, Reynaldo L.

Subject: Public Records Request

Date: January 15, 2015

Via Email and Hand-Delivery



From: dltorres@cabq.gov

To: achristophersen@hotmail.com

CC: chavezr@cabq.gov

Subject: IPRA/MEDIA/BurqueMedia/Christophersen/Public Records Request/ALL Lapel camera videos from APD officers pertaining to the shooting at San Mateo and Constitution on January 13, 2015/Completed 02/05/15

Date: Thu, 5 Feb 2015 21:37:20 +0000

Dear Mr. Christophersen:

This correspondence is in response to your records request dated January 15, 2015, which was an Inspection of Public Records Request for:

- I am formally requesting a copy of: ALL Lapel camera videos from APD officers pertaining to the shooting at San Mateo and Constitution on January 13, 2015.

The City has searched, reviewed, and will now make available the responsive non-exempted document. Even though, the investigation is on-going, we determined at least one responsive document was not exempt and therefore could be provided to you. As for any additional documents, we cannot permit inspection of those records because I, as APD custodian of records, have determined they are exempted from disclosure for the following reason:

- *The records requested are confidential law enforcement records protected under NMSA 1978, § 14-2-1(A)(4) of the Inspection of Public Records Act. That video might seriously interfere with the effectiveness of a criminal investigation, while at the same time the release might also unfairly cast suspicion of innocent people.*

APD will require the complete copying costs up front prior to the inspection or pick-up. Our authority to make this demand for pre-payment of copying costs comes directly from IPRA. See NMSA 1978, § 14-2-9(C)(4) ("may charge the actual costs associated with transmitting copies of public records by mail"); see also NMSA 1978, § 14-2-9(C)(5) ("may require advance payment of the fees before making copies of public records."). Please review the attached invoice for payment of the responsive document. Once we receive verification of your payments, then my office will provide the responsive record or identify the location it can be picked up.

Please do not hesitate to contact me if you have any questions or comments.

Kind regards,

Office of the APD Records Custodian
Reynaldo Chavez
APD Records Custodian/IPRA Manager
400 Roma Avenue NW, Alb., NM 87102
Office (505) 768-2007
City Cell (505) 235-2160
FAX (505) 768-2540
chavezr@cabq.gov
rey_chavez@iCloud.com

David L Torres Jr
APD Senior IPRA Analyst
Albuquerque Police Department
(505) 768-2183 (Office)
(505) 768-2150 (Fax)
dltorres@cabq.gov.com



From: Andrew Christophersen [mailto:achristophersen@hotmail.com]

Sent: Thursday, April 09, 2015 9:09 AM

To: Chavez, Geraldine A.

Subject: RE: IPRA/MEDIA/ANDREW CHRISTOPHERSEN/SAN MATEO AND CONSTITUTION

Geraldine Chavez / David Torres/ Reynaldo Chavez

Your office has not complied with my request. Your office claims that the files we are seeking are exempt when in fact they are not.

The ACLU is reviewing this case and we will not accept only a portion of the request.

Once again my request is for ALL lapel video from ALL officers that were involved in the shooting of John O'Keefe January 13, 2015.

Andrew Christophersen

From: gachavez@cabq.gov

To: achristophersen@hotmail.com

CC: dltorres@cabq.gov; chavezr@cabq.gov

Subject: IPRA/MEDIA/ANDREW CHRISTOPHERSEN/SAN MATEO AND CONSTITUTION

Date: Thu, 9 Apr 2015 12:52:42 +0000

Mr. Christophersen,

It has been (30) day since a notification of completion for your IPRA dated Fenruary 5th, 2015 was sent. If we do not receive a response on or before April 13th, 2015 your request will be discarded.

Kind regards,

Office of the APD Records Custodian

Reynaldo Chavez

APD Records Custodian/Central Records Supervisor/IPRA Manager

400 Roma Avenue NW, Alb., NM 87102

Office (505) 768-2007

City Cell (505) 235-2160

FAX (505) 768-2540

chavezr@cabq.gov

rey_chavez@iCloud.com



From: achristophersen@hotmail.com
To: wtownley@aclunm.onmicrosoft.com
Subject: FW: Closed 4 9 2015 per requestor / IPRA/MEDIA/ANDREW CHRISTOPHERSEN/SAN MATEO AND CONSTITUTION
Date: Wed, 1 Jul 2015 13:35:45 -0600

From: chavezr@cabq.gov
To: achristophersen@hotmail.com
Subject: Closed 4 9 2015 per requestor / IPRA/MEDIA/ANDREW CHRISTOPHERSEN/SAN MATEO AND CONSTITUTION
Date: Thu, 9 Apr 2015 21:29:01 +0000

Dear Mr. Christophersen,

An exemption has been asserted.

As you note that you *will not accept only a portion of the request* as we have afforded you the opportunity, your request will be closed.

You may resubmit at any time.

Kind regards,

Office of the APD Records Custodian
Reynaldo Chavez
APD Records Custodian/IPRA Manager
400 Roma Avenue NW, Alb., NM 87102
Office (505) 768-2007
Cell (505) 235-2160
chavezr@cabq.gov





Food Drive
Thanksgiving Day – December 20th



KRQE NEWS 13

Albuquerque Police Department records custodian suing the city

By Shelby Perea (<http://krqe.com/author/shelby-perea/>)

Published: September 8, 2015, 8:52 pm | Updated: September 15, 2015, 10:14 am



ALBUQUERQUE (KRQE) – The former Albuquerque Police Department records custodian plans to sue the city.

Reynaldo Chavez filed a “notice to sue letter” on Monday. The letter says Chief Gorden Eden ordered him to find ways to deny public record requests from the news, media and members of the public.



Chavez claims he was fired last month because he complained to department officials.

On Tuesday, APD couldn't respond to the lawsuit.

They did give this statement: "APD carefully evaluates document requests to ensure that it does not release sensitive information, such as social security numbers, documents that are confidential by law, or evidence that could compromise an investigation. APD is committed to transparency and strives to improve how quickly it is able to respond to requests from the public."

KRQE News 13

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u

From: Andrew Christophersen [mailto:achristophersen@hotmail.com]
Sent: Wednesday, July 08, 2015 5:23 PM
To: APD IPRA
Subject: IPRA / date corrected

Date: July 8, 2015

Via Email and Hand-Delivery

BurqueMedia.com
202 Harvard Dr SW 87016
Albuquerque New Mexico
(505) 363-8213
burquemediaproductions@gmail.com

Javier Urban
Acting APD Records Custodian/Central Records Supervisor
400 Roma NW 87102
Albuquerque New Mexico

Dear : Mr Urban,

This is a formal request under the New Mexico Inspection of Public Records Act ("IPRA") also known as the New Mexico Sunshine Law (NMSA 1978, Chapter 14, Article 2).

I am formally requesting a copy of: ALL Lapel camera videos from Officers involved pertaining to the shooting of John Edward O'Keefe near San Mateo and Constitution on January 13, 2015.

AS you are aware "'public records' means all documents, papers, letters, books, maps, tapes, photographs, recordings and other materials, regardless of physical form or characteristics, that are used, created, received, maintained or held by or on behalf of any public body and relate to public business, whether or not the records are required by law to be created or maintained." (14-2-6 NMSA 1978)

As you also know there has been no statutory exemption enacted that would pertain to these records. (14-2-1 NMSA 1978) You will also be further aware that according to the New Mexico



Supreme Court "a citizen's right to know is the rule and secrecy is the exception."

Furthermore as clearly and explicitly set forth in the "Purpose of the act; declaration of public policy" (14-2-4 NMSA 1978) the New Mexico Legislature established that their intent was to ensure, by declaring it public policy, that all persons are entitled to the "greatest possible information regarding the affairs of government and the official acts of public officers and employees." The Legislature further unambiguously stated its intent and established as public policy that providing persons with such records "is an essential function of a representative government and an integral part of the routine duties of public officers and employees.(14-2-5 NMSA)

As the designated Public Records Custodian for the City you have an obligation to provide reasonable access to copies of such public records "during usual business hours." (14-2-8 NMSA). And while, at maximum, the legislation provides a fifteen day period to provide records and a three day period upon receipt of the request to explain, in writing, when such records, if not provided prior to that date, the date when the request will be fulfilled - the clear intent of the Legislature is not to deem this maximum period as reasonable in all cases but only when necessary to fulfill the request. Otherwise the legislation requires records, that are readily at hand and easily produced, to be provided without unnecessary delay - or in other words - "immediately or as soon as is practicable under the circumstances." (14-2-8(D) NMSA)

This requirement for timely production becomes even more important when a record is either or both of great public interest and needed in a timely manner.

The records requested herein are already available with nothing to cause a minimal delay beyond the time it takes to make an electronic copy. Thus this request is clearly neither "excessively burdensome" nor "over broad" in nature.

Furthermore, by their very nature, it is without question these are records both in their entirety and in any and every portion thereof that is a non-exempt record covered under this law.

I am prepared to pay a reasonable cost for the duplication and CD or DVD for this request. The law requires "the actual costs associated with downloading copies of public records to a computer disk or storage device, including the actual cost of the computer disk or storage device" alone be assessed for these records. If that cost is to exceed the \$5 established by the City of Albuquerque's published policy for records fees that establishes that the cost for each CD or DVD is to be set at \$5 I request that you notify me immediately in writing (you can use the email listed herein for all communications to me pertaining to this request in order to ensure the most expedited process) as to the claimed cost and the legal basis upon which that fee has been established.

Although clearly there are no statutory exemptions for this record if you intend to claim such and thus to withhold either the whole or any portion of the records please notify me in writing as to the explicit statutory exemption being claimed and relied upon. Furthermore, if portions thereof are claimed exempt, please provide me those records that have no exemptions claimed prior to and at the first possible time and do not delay those portions until the other records, containing exemptions, are provided.

Given the public importance and interest in this record I request that you provide this record to me as soon as reasonably possible - no later than July 29, 2015. This time frame is consistent with the clear intent of the law as cited above. However - if you are unable to produce this record in that reasonable time frame - please notify me in writing as to the reason for the delay and the date when the record will be made available. Please contact me either by phone or email (provided herein) once the record is ready and I will pick it up from your office.

Thank you for your prompt attention to this matter. Again please contact via the phone or email provided herein if you have any questions regarding this request and provide any written responses via that email address listed above.

Sincerely,

Andrew Christophersen

Dinah Vargas

Steve Kramer

BurqueMedia.com

(505) 363-8213

burquemediaproductions@gmail.com

RECEIVED BY

DATE

From: vnpadilla@cabq.gov
To: achristophersen@hotmail.com
CC: jurban@cabq.gov; jmgarza@cabq.gov
Subject: IPRA/MEDIA/CHRISTOPHERSEN/BURQUE MEDIA/O'KEEFE/COMPLETION
Date: Mon, 13 Jul 2015 21:22:25 +0000

Mr. Christophersen,

This email will acknowledge completion of your public records request dated, 2015.

There is no responsive information available related to your request. **§ 14-2-1(A)(4)**

Please do not hesitate to contact me if you have any questions or comments.

Kind regards,

Office of the Acting APD Records Custodian
Javier Urban
Acting APD Records Custodian/Central Records Supervisor
400 Roma Avenue NW, Alb., NM 87102
Office (505) 768-2137
Cell (505-917-6534
apdipra@cabq.gov

From: Padilla, Valerie N.
Sent: Thursday, July 09, 2015 8:30 AM
To: 'achristophersen@hotmail.com'
Cc: Urban, Javier F.; Garza, Jacqueline M.
Subject: IPRA/MEDIA/CHRISTOPHERSEN/BURQUE MEDIA/O'KEEFE

Mr. Christophersen,

This email will acknowledge receipt of your public records request [dated July 8th, 2015 and received by my office on July 9th, 2015](#). Please be advised we are reviewing your request to determine what public records are responsive and whether any exceptions to their production apply. We will continue our review and contact you prior to the expiration of fifteen (15) days from the receipt of your request. Please do not hesitate to contact me if you have any questions or comments.

Please note: providing a case number with your request will help expedite the retrieval and provision of the requested material.

Please do not hesitate to contact me if you have any questions or comments.

Kind regards,

Office of the Acting APD Records Custodian
Javier Urban

