

Scott M. McNair

Phoenix, Arizona

June 29, 2004

Maricopa County
Attn: Janice Stratton, Merit Systems Administrator
301 West Jefferson, Suite 219
Phoenix, AZ 85003

Subject: Complainant's First Supplemental Discovery Request

Ms. Stratton,

The following are additional requests of discovery items.

45. Full disclosure including copies of all of all notes, computer records, reports, emails, policies, procedures, rules, regulations, statutes, and other documents related to any instruction to or from the Board of Supervisors, Clerk of the Board of Supervisors, Richard Romley, Administrative Assistant(s) to Richard Romley, David Smith (CAO), Administrative Assistant(s) to David Smith, Director of Human Resources, Administrative Assistant(s) to the Director of Human Resources, concerning the handling, transfer, or avoidance of correspondence from Scott McNair or his representative.
46. Copies of all notes, reports, emails, policies, procedures, and other documents related to or concerning any instructions related to the altering, editing, redacting, modifying or otherwise tampering with public records in response to Public Record Requests.
47. Copies of all notes, reports, emails, policies, procedures, and other documents related to or concerning any instructions related to the altering, editing, redacting, modifying, or otherwise tampering with public records in response to Public Record Requests in which the County is aware that such items may be used as evidence.
48. Copies of all notes, reports, emails, policies, procedures, and other documents related to or concerning the notification(s) sent to the County (including but not limited to the Board of Supervisors, County Attorney's Office, Marty Scott, Sarah Simpson, Diane Weikamp, Fran McCarroll, and Cynthia Robinson) by Scott McNair that emails and data backups of such should be retained and protected for use as evidence.

Sincerely,

Scott M. McNair