

CIVIL DIVISION OFFICE 9  
CENTRAL DIVISION  
2007 JUL 31 A 9:53

1 BRIGGS LAW CORPORATION [FILE: 1007.11]  
2 Cory J. Briggs (State Bar no. 176284)  
3 Karen L. Skaret (State Bar no. 239779)  
4 99 East "C" Street, Suite 111  
5 Upland, CA 91786  
6 Telephone: 909-949-7115

7 Attorneys for Plaintiff and Petitioner Citizens for  
8 Responsible Equitable Environmental Development

BLC COPY

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF SAN DIEGO--CENTRAL DIVISION

11 CITIZENS FOR RESPONSIBLE EQUITABLE  
12 ENVIRONMENTAL DEVELOPMENT,

CASE NO. 37-2007-00072076-CU-CO-CTL

13 Plaintiff and Petitioner,

**VERIFIED COMPLAINT FOR  
DECLARATORY AND INJUNCTIVE  
RELIEF AND PETITION FOR WRIT OF  
MANDATE UNDER THE COMMUNITY  
REDEVELOPMENT LAW AND THE  
CALIFORNIA PUBLIC RECORDS ACT**

14 vs.

15 REDEVELOPMENT AGENCY OF THE CITY OF  
16 SAN DIEGO; CITY OF SAN DIEGO; CENTRE  
17 CITY DEVELOPMENT CORPORATION, INC.;  
18 SOUTHEASTERN ECONOMIC DEVELOPMENT  
19 CORPORATION; and DOES 1 through 100,

20 Defendants and Respondents.

21 Plaintiff and Petitioner CITIZENS FOR RESPONSIBLE EQUITABLE ENVIRONMENTAL  
22 DEVELOPMENT ("CREED") alleges as follows in this Verified Complaint for Declaratory and  
23 Injunctive Relief and Petition for Writ of Mandate under the Community Redevelopment Law and the  
24 California Public Records Act:

25 **Introductory Statement**

26 1 CREED brings this action under the Community Redevelopment Law ("CRL") and the  
27 California Public Records Act ("Act"). CREED submitted a written request to inspect and obtain  
28 copies of certain public records in the possession of Defendants/Respondents, but they have failed to

1 respond in full as required by the CPRA. What little they did say, however, demonstrates that they have  
2 violated the CRL.

### 3 **Parties**

4 2 CREED is a non-profit corporation formed and operating under the laws of the State of  
5 California. Its purpose is, among other things, to advocate for responsible and equitable environmental  
6 development for members of the public. Its members include citizens and taxpayers residing in or doing  
7 business in the City of San Diego.

8 3. Defendants/Respondents REDEVELOPMENT AGENCY OF THE CITY OF SAN  
9 DIEGO (“RASD”), CITY OF SAN DIEGO (“CITY”), CENTRE CITY DEVELOPMENT  
10 CORPORATION, INC. (“CCDC”), and SOUTHEASTERN ECONOMIC DEVELOPMENT  
11 CORPORATION (“SEDC”) are local agencies under the CPRA (*see* GOV’T CODE § 6252(a)).  
12 Defendant and Respondent RASD is an agency under the CRL (*see* HEALTH & SAFETY CODE § 33003).

13 4. The true names and capacities of the Defendants/Respondents identified as DOES 1  
14 through 100 are unknown to CREED, who will seek the Court’s permission to amend this pleading in  
15 order to allege the true names and capacities as soon as they are ascertained. CREED is informed and  
16 believes and on that basis alleges that each of the fictitiously named Defendants/Respondents 1 through  
17 100 has jurisdiction by law over one or more of the acts and omissions that are the subject of this  
18 proceeding or has some other cognizable interest in the outcome of this proceeding.

19 5. CREED is informed and believes and on that basis alleges that, at all times stated in this  
20 pleading, each Defendant/Respondent was the agent, servant, or employee of each other  
21 Defendant/Respondent and was, in doing the things alleged in this pleading, acting within the scope of  
22 said agency, servitude, or employment and with the full knowledge or subsequent ratification of his  
23 principals, masters, and employers. Alternatively, in doing the things alleged in this pleading, each  
24 Defendant/Respondent was acting alone and solely to further his own interests.

### 25 **Jurisdiction and Venue**

26 6. The Court has jurisdiction over this proceeding pursuant to Government Code Sections  
27 6258 and 6259, Code of Civil Procedure Section 1060 *et seq.*, and Code of Civil Procedure Section  
28 1084 *et seq.*



1 Agency of the City of San Diego's legislative body of major  
2 violations of the Community Redevelopment Law as required by  
Health and Safety Code Section 33080.2(a).

3 "3. The minutes for each and every meeting at which the  
4 Redevelopment Agency of the City of San Diego's legislative  
5 body took any ACTION as required by Health and Safety Code  
6 Section 33080.2(b). (As used in this request, "ACTION" means  
7 action that the legislative body deemed appropriate on a report  
8 submitted pursuant to Health and Safety Code Section 33080.1.)

9 "4. All statements of indebtedness and reconciliation reports filed by  
10 the Redevelopment Agency of the City of San Diego under  
11 Health and Safety Code Section 33675(b) from January 1, 2000,  
12 through the date of this request."

13 (True and correct copies of CREED's requests are attached to this pleading as Exhibit "A" and  
14 incorporated by reference.)

15 10. Government Code Section 6253(c) provides as follows: "Each agency, upon a request  
16 for a copy of records, shall, within 10 days from receipt of the request, determine whether the request,  
17 in whole or in part, seeks copies of disclosable public records in the possession of the agency and shall  
18 promptly notify the person making the request of the determination and the reasons therefor. \* \* \*"

19 11. On or about July 26, 2007, Eric Symons responded on behalf of Defendants/Respondents  
20 to items 1a through 1h of CREED's request. Mr. Symons indicated that "the independent financial  
21 audit reports . . . are not available to date for fiscal years 2003-2006. . . ." Mr. Symons did not respond  
22 to items 2 through 4 of CREED's request. (A true and correct copy of the response by Mr. Symons is  
23 attached to this pleading as Exhibit "B" and incorporated by reference.)

24 12. On or about July 27, 2007, CREED replied to Mr. Symons by asking, among other  
25 things, about the status of a response to items 2 through 4 of CREED's request. CREED received no  
26 answer to its reply to Mr. Symons. (A true and correct copy of CREED's reply to Mr. Symons is  
27 attached to this pleading as Exhibit "C" and incorporated by reference.)

28 13. Items 2 through 4 of CREED's request are public records under the CPRA.

14. The failure of Defendants/Respondents to respond to CREED's request with respect to  
items 2 through 4 and allow CREED to inspect and obtain copies of the requested public records is  
unlawful under the CPRA.

1 15. CREED has been injured as a result of the unlawful failure of Defendants/Respondents  
2 to respond to CREED's request with respect to items 2 through 4 and allow CREED to inspect and  
3 obtain copies of the requested public records, but money damages are an insufficient legal remedy.

4 **SECOND CAUSE OF ACTION:**  
5 **Writ of Mandate under Code of Civil Procedure Section 1084 et seq.**  
6 (Against All Defendants/Respondents for CPRA Violations)

6 16. Paragraphs 1 through 15 are fully incorporated into this paragraph.

7 17. The CPRA requires Defendants/Respondents to permit CREED to inspect and obtain  
8 copies of items 2 through 4 of CREED's request that are not exempt from disclosure.

9 18. Defendants/Respondents had and continue to have a mandatory public duty under the  
10 CPRA to permit CREED to inspect and obtain copies of items 2 through 4 of CREED's request because  
11 they are public records that are not exempt from disclosure. The persistence of Defendants/Respondents  
12 in failing to permit CREED to inspect and obtain copies of these items violates the CPRA and denies  
13 CREED of public information to which it is entitled under the CPRA.

14 **THIRD CAUSE OF ACTION:**  
15 **Violation of the Community Redevelopment Law**  
16 (Against All Defendants/Respondents except CITY)

16 19. Paragraphs 1 through 18 are fully incorporated into this paragraph.

17 20. Health and Safety Code Section 33080.1 requires every redevelopment agency to present  
18 an annual report to its legislative body within six months of the end of the agency's fiscal year.

19 21. Defendants/Respondents failed to present annual reports to RASD's legislative body for  
20 fiscal years 2003, 2004, 2005, and 2006, even though more than six months has passed since the end  
21 of each of those fiscal years.

22 22. The failure of Defendants/Respondents to present the annual reports for fiscal years  
23 2003, 2004, 2005, and 2006 to RASD's legislative body is unlawful under the CRL.

24 23. CREED has been injured as a result of the unlawful failure of Defendants/Respondents  
25 to present the annual reports for fiscal years 2003, 2004, 2005, and 2006 to RASD's legislative body,  
26 but money damages are an insufficient legal remedy.

1 **FOURTH CAUSE OF ACTION:**  
2 **Writ of Mandate under Code of Civil Procedure Section 1084 et seq.**  
3 **(Against All Defendants/Respondents except CITY for CRL Violations)**

4 24. Paragraphs 1 through 23 are fully incorporated into this paragraph.

5 25. The CRL requires Defendants/Respondents to present an annual report to RASD's  
6 legislative body for fiscal years 2003, 2004, 2005, and 2006 within six months of the end of each fiscal  
7 year.

8 26. Defendants/Respondents had and continue to have a mandatory public duty under the  
9 CRL to present an annual report to RASD's legislative body for fiscal years 2003, 2004, 2005, and  
10 2006. The persistence of Defendants/Respondents in failing to present the annual reports to RASD's  
11 legislative body violates the CRL and denies CREED and other members of the public of the  
12 information and legal protections to which they are entitled under the CRL.

13 **Prayer**

14 For all these reasons, CREED respectfully prays for the following relief against  
15 Defendants/Respondents jointly and severally:

16 1. On the First Cause of Action:

17 A. Preliminary and permanent injunctive relief directing them to permit CREED to  
18 inspect and obtain copies of the requested public records; and

19 B. An order determining and declaring that their failure to permit CREED to  
20 inspect and obtain copies of the requested public records does not comply with  
21 the CPRA.

22 2. On the Second Cause of Action:

23 A. An order determining and declaring that their failure to permit CREED to  
24 inspect and obtain copies of the requested public records does not comply with  
25 the CPRA; and

26 B. A writ of mandate (i) ordering them to comply with the CPRA and (ii)  
27 prohibiting each of them from refusing to permit CREED to inspect and obtain  
28 copies of the requested public records.



1 C. Any further relief that this Court may deem appropriate.

2  
3 Date: July 31, 2007.

Respectfully submitted,

4 BRIGGS LAW CORPORATION  
5 Cory J. Briggs  
6 Karen L. Skaret

7 By:

\_\_\_\_\_  
Cory J. Briggs

8 Attorneys for Plaintiff and Petitioner Citizens for  
9 Responsible Equitable Environmental Development

**VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND  
PETITION FOR WRIT OF MANDATE UNDER THE COMMUNITY  
REDEVELOPMENT LAW AND THE CALIFORNIA PUBLIC RECORDS ACT**

Exhibit "A"

# **BRIGGS LAW CORPORATION**

*San Diego Office:  
5663 Balboa Avenue, No. 376  
San Diego, CA 92111-2705*

*Telephone: 858-495-9082  
Facsimile: 858-495-9138*

*Please respond to: Inland Empire Office*

*Inland Empire Office:  
99 East "C" Street, Suite 111  
Upland, CA 91786*

*Telephone: 909-949-7115  
Facsimile: 909-949-7121*

*BLC File(s): 1007.99*

16 July 2007

Public Records Officer  
City of San Diego  
c/o City Clerk Elizabeth Maland  
202 C Street, 2nd Floor  
San Diego, CA 92101

**Via Facsimile and U.S. Mail**

Re: Request to Inspect and Obtain Copies of Public Records

Dear Public Records Officer:

On behalf of Citizens for Responsible Equitable Environmental Development and pursuant to the California Public Records Act (GOV'T CODE § 6250 *et seq.*), I am writing to request an opportunity to inspect and obtain copies of the "public records" (as that term is defined under the Act) listed on *Attachment 1: Categories of Requested Public Records* to this request.

I ask that you make a determination on this request within 10 days of your receiving it, or even sooner if you can do so without having to review the responsive records. If you believe that any of these records is exempt from disclosure, I urge you to note in your reply whether the exemption is discretionary and, if so, whether you are required to exercise your discretion to withhold the record in this particular case. If you determine that any portion of the responsive records is exempt from disclosure and that you intend to withhold that portion, I ask that you redact that portion for the time being and make the other portion available as requested. In any event, please respond with a signed notification citing the legal authorities on which you rely if you determine that any portion of the responsive records, if not all of them, is exempt and will not be disclosed.

If public records responsive to this request are available in one or more non-paper formats (including but not limited to electronic, magnetic, or digital formats), make sure that your response to this request includes production of all responsive records in non-paper formats even if the records are also available in paper format. If there are no records responsive to a particular category listed on *Attachment 1*, please confirm in writing that such records do not exist; and if responsive records used to exist but have been lost, stolen, or destroyed, please (i) identify the date of loss, theft, or destruction and (ii) provide a copy of all available evidence of the loss, theft, or destruction.

All responsive records must be produced for inspection before my client will pay for copies, unless I agree otherwise in writing after receiving your estimate of copying costs.



Furthermore, my client reserves the right to make its own reproduction of the responsive records, at its own expense.

This request is also being made pursuant to Health and Safety Code Section 33080(b).

Thank you for your time and attention to this matter. If I can provide any clarification that will help you to expedite this request, please do not hesitate to contact me.

Sincerely,

BRIGGS LAW CORPORATION

Cory J. Briggs



## **Attachment 1: Categories of Requested Public Records**

- 1a. The annual report presented by the Redevelopment Agency of the City of San Diego to its legislative body as required by Health and Safety Code Section 33080.1 for the fiscal year ending in 2000.
- 1b. The annual report presented by the Redevelopment Agency of the City of San Diego to its legislative body as required by Health and Safety Code Section 33080.1 for the fiscal year ending in 2001.
- 1c. The annual report presented by the Redevelopment Agency of the City of San Diego to its legislative body as required by Health and Safety Code Section 33080.1 for the fiscal year ending in 2002.
- 1d. The annual report presented by the Redevelopment Agency of the City of San Diego to its legislative body as required by Health and Safety Code Section 33080.1 for the fiscal year ending in 2003.
- 1e. The annual report presented by the Redevelopment Agency of the City of San Diego to its legislative body as required by Health and Safety Code Section 33080.1 for the fiscal year ending in 2004.
- 1f. The annual report presented by the Redevelopment Agency of the City of San Diego to its legislative body as required by Health and Safety Code Section 33080.1 for the fiscal year ending in 2005.
- 1g. The annual report presented by the Redevelopment Agency of the City of San Diego to its legislative body as required by Health and Safety Code Section 33080.1 for the fiscal year ending in 2006.
- 1h. The annual report presented by the Redevelopment Agency of the City of San Diego to its legislative body as required by Health and Safety Code Section 33080.1 for the fiscal year ending in 2007.
2. For each and every fiscal year described in the preceding requests, all public records informing the Redevelopment Agency of the City of San Diego's legislative body of major violations of the Community Redevelopment Law as required by Health and Safety Code Section 33080.2(a).

[Attachment 1 continues on next page.]



### **Attachment 1: Categories of Requested Public Records**

3. The minutes for each and every meeting at which the Redevelopment Agency of the City of San Diego's legislative body took any ACTION as required by Health and Safety Code Section 33080.2(b). (As used in this request, "ACTION" means action that the legislative body deemed appropriate on a report submitted pursuant to Health and Safety Code Section 33080.1.)
4. All statements of indebtedness and reconciliation reports filed by the Redevelopment Agency of the City of San Diego under Health and Safety Code Section 33675(b) from January 1, 2000, through the date of this request.

*[Attachment 1 ends here.]*



# **BRIGGS LAW CORPORATION**

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*Telephone: 909-949-7115  
Facsimile: 909-949-7121*

*BLC File(s): 1007.99*

16 July 2007

Public Records Officer  
Centre City Development Corporation  
c/o Frank J. Alessi, Agent for Service of Process  
225 Broadway, Suite 1100  
San Diego, CA 92101

**Via Facsimile and U.S. Mail**

Re: Request to Inspect and Obtain Copies of Public Records

Dear Public Records Officer:

On behalf of Citizens for Responsible Equitable Environmental Development and pursuant to the California Public Records Act (GOV'T CODE § 6250 *et seq.*), I am writing to request an opportunity to inspect and obtain copies of the "public records" (as that term is defined under the Act) listed on *Attachment 1: Categories of Requested Public Records* to this request.

I ask that you make a determination on this request within 10 days of your receiving it, or even sooner if you can do so without having to review the responsive records. If you believe that any of these records is exempt from disclosure, I urge you to note in your reply whether the exemption is discretionary and, if so, whether you are required to exercise your discretion to withhold the record in this particular case. If you determine that any portion of the responsive records is exempt from disclosure and that you intend to withhold that portion, I ask that you redact that portion for the time being and make the other portion available as requested. In any event, please respond with a signed notification citing the legal authorities on which you rely if you determine that any portion of the responsive records, if not all of them, is exempt and will not be disclosed.

If public records responsive to this request are available in one or more non-paper formats (including but not limited to electronic, magnetic, or digital formats), make sure that your response to this request includes production of all responsive records in non-paper formats even if the records are also available in paper format. If there are no records responsive to a particular category listed on *Attachment 1*, please confirm in writing that such records do not exist; and if responsive records used to exist but have been lost, stolen, or destroyed, please (i) identify the date of loss, theft, or destruction and (ii) provide a copy of all available evidence of the loss, theft, or destruction.

All responsive records must be produced for inspection before my client will pay for copies, unless I agree otherwise in writing after receiving your estimate of copying costs.



Furthermore, my client reserves the right to make its own reproduction of the responsive records, at its own expense.

This request is also being made pursuant to Health and Safety Code Section 33080(b).

Thank you for your time and attention to this matter. If I can provide any clarification that will help you to expedite this request, please do not hesitate to contact me.

Sincerely,

BRIGGS LAW CORPORATION

Cory J. Briggs



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- 1e. The annual report presented by the Redevelopment Agency of the City of San Diego to its legislative body as required by Health and Safety Code Section 33080.1 for the fiscal year ending in 2004.
- 1f. The annual report presented by the Redevelopment Agency of the City of San Diego to its legislative body as required by Health and Safety Code Section 33080.1 for the fiscal year ending in 2005.
- 1g. The annual report presented by the Redevelopment Agency of the City of San Diego to its legislative body as required by Health and Safety Code Section 33080.1 for the fiscal year ending in 2006.
- 1h. The annual report presented by the Redevelopment Agency of the City of San Diego to its legislative body as required by Health and Safety Code Section 33080.1 for the fiscal year ending in 2007.
2. For each and every fiscal year described in the preceding requests, all public records informing the Redevelopment Agency of the City of San Diego's legislative body of major violations of the Community Redevelopment Law as required by Health and Safety Code Section 33080.2(a).

[Attachment 1 continues on next page.]



### **Attachment 1: Categories of Requested Public Records**

3. The minutes for each and every meeting at which the Redevelopment Agency of the City of San Diego's legislative body took any ACTION as required by Health and Safety Code Section 33080.2(b). (As used in this request, "ACTION" means action that the legislative body deemed appropriate on a report submitted pursuant to Health and Safety Code Section 33080.1.)
4. All statements of indebtedness and reconciliation reports filed by the Redevelopment Agency of the City of San Diego under Health and Safety Code Section 33675(b) from January 1, 2000, through the date of this request.

*[Attachment 1 ends here.]*



# **BRIGGS LAW CORPORATION**

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Upland, CA 91786*

*Telephone: 909-949-7115  
Facsimile: 909-949-7121*

*BLC File(s): 1007.99*

16 July 2007

Public Records Officer  
Southeastern Economic Development Corporation  
c/o Carolyn Y. Smith, Agent for Service of Process  
4393 Imperial Avenue  
San Diego, CA 92113

**Via Facsimile and U.S. Mail**

Re: Request to Inspect and Obtain Copies of Public Records

Dear Public Records Officer:

On behalf of Citizens for Responsible Equitable Environmental Development and pursuant to the California Public Records Act (GOV'T CODE § 6250 *et seq.*), I am writing to request an opportunity to inspect and obtain copies of the "public records" (as that term is defined under the Act) listed on *Attachment 1: Categories of Requested Public Records* to this request.

I ask that you make a determination on this request within 10 days of your receiving it, or even sooner if you can do so without having to review the responsive records. If you believe that any of these records is exempt from disclosure, I urge you to note in your reply whether the exemption is discretionary and, if so, whether you are required to exercise your discretion to withhold the record in this particular case. If you determine that any portion of the responsive records is exempt from disclosure and that you intend to withhold that portion, I ask that you redact that portion for the time being and make the other portion available as requested. In any event, please respond with a signed notification citing the legal authorities on which you rely if you determine that any portion of the responsive records, if not all of them, is exempt and will not be disclosed.

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All responsive records must be produced for inspection before my client will pay for copies, unless I agree otherwise in writing after receiving your estimate of copying costs.



Furthermore, my client reserves the right to make its own reproduction of the responsive records, at its own expense.

This request is also being made pursuant to Health and Safety Code Section 33080(b).

Thank you for your time and attention to this matter. If I can provide any clarification that will help you to expedite this request, please do not hesitate to contact me.

Sincerely,

BRIGGS LAW CORPORATION

Cory J. Briggs



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2. For each and every fiscal year described in the preceding requests, all public records informing the Redevelopment Agency of the City of San Diego's legislative body of major violations of the Community Redevelopment Law as required by Health and Safety Code Section 33080.2(a).

[Attachment 1 continues on next page.]



### **Attachment 1: Categories of Requested Public Records**

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4. All statements of indebtedness and reconciliation reports filed by the Redevelopment Agency of the City of San Diego under Health and Safety Code Section 33675(b) from January 1, 2000, through the date of this request.

*[Attachment 1 ends here.]*



**VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND  
PETITION FOR WRIT OF MANDATE UNDER THE COMMUNITY  
REDEVELOPMENT LAW AND THE CALIFORNIA PUBLIC RECORDS ACT**

Exhibit "B"



## THE CITY OF SAN DIEGO

July 26, 2007

VIA FACSIMILE TO (909) 949-7121 &amp; U.S. MAIL

Cory J. Briggs  
Briggs Law Corporation  
99 East "C" Street, Suite 111  
Upland, CA 91786

Reference: Public Records Act Request of July 16, 2007

Dear Cory Briggs:

Reference is made to the above-mentioned public records act request dated July 16, 2007 made by your firm regarding fiscal year annual reports presented by the Redevelopment Agency to its legislative body.

The reporting on Agency activities pertaining to housing and the alleviation of blight among other items is performed by Agency staff. This information has been compiled each fiscal year and reported to the State in accordance with the law. The State's summary of this data for the Agency is available online through Fiscal Year 2005 at <http://www.hcd.ca.gov/hpd/rda/04-05/rdasum04-05.pdf>. The State's summary of FY 2006 data should be available online by August 2007.

While the Agency compiled the available data (with exception of the independent financial audit reports which are not available to date for fiscal years 2003-2006) and consistently submitted the data to the State each fiscal year in accordance with the law, records indicate that the Agency has not presented annual reports as a formal agenda item to the City Council. As a practical matter, the information typically contained in these reports has been reviewed by the Agency (and thus the City Council) each year as a part of the review and approval of the Agency's annual budget.

If you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,

Eric Symons  
Communications Manager

cc: Janice Weinrick, Deputy Executive Director, Redevelopment Agency  
Scott Mercer, Supervising Management Analyst, City Redevelopment Division

**City Planning and Community Investment**

202 C Street, MS 4A • San Diego, CA 92101-3864  
Tel (619) 235-5200 Fax (619) 533-5951

**VERIFIED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND  
PETITION FOR WRIT OF MANDATE UNDER THE COMMUNITY  
REDEVELOPMENT LAW AND THE CALIFORNIA PUBLIC RECORDS ACT**

Exhibit "C"

# **BRIGGS LAW CORPORATION**

*San Diego Office:  
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*BLC File(s): 1007.99*

27 July 2007--Corrected Letter

Eric Symons  
City Planning and Community Investment  
City of San Diego  
202 C Street, MS 4A  
San Diego, CA 92101-3864

**Via Facsimile and U.S. Mail**

Re: Request to Inspect and Obtain Copies of Public Records

Dear Mr Symons:

Thank you for your July 26, 2007 response to my client's July 15, 2007 request to inspect and obtain copies of public records. Your response raises two questions.

First, on whose behalf was your response made? Were you responding on behalf of the City of San Diego, the Redevelopment Agency of the City of San Diego, Centre City Development Corporation, Southeastern Economic Development Corporation, or some combination thereof? I received a phone call last night from CCDC's attorney, which suggests to me that your response does not cover CCDC. Please clarify the scope of your response today, in writing, so that I do not erroneously pursue other recipients of my request.

Second, what about the public records responsive to item nos. 2-4 in my request? Your response makes no reference to such records at all. Do those records exist or not? If so, they must be made available immediately and I will hold off only until July 31, 2007, before compelling their disclosure through a court proceeding. If not, simply tell me so in writing.

Thank you for your prompt assistance in this matter.

Sincerely,

BRIGGS LAW CORPORATION

Cory J. Briggs

cc: City Clerk Elizabeth Maland (via fax only)

