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December 4, 2013

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***VIA E-MAIL***

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**Re: Response to SEIU's Request for Information dated:  
November 20, 2013  
November 26, 2013  
December 3, 2013**

Dear Mr. Graham and Mr. Soria:

The County is providing information responsive to your multiple Requests for Information which were also submitted as a Public Records Requests. The County objects to SEIU's requests to the extent that they call for the County to conduct a search that is unduly burdensome or oppressive, such as requesting documents dating back to 1990. The County will interpret the request to require the County to conduct a diligent search for responsive documents. The County has done that and has provided that information in this correspondence and forthcoming emails. The County also objects to the request to the extent that it seeks information or documents that are not currently in the County's possession, custody or control, and to the extent that SEIU requests documents that are equally available to SEIU, such as MOUs dating back to 1990 to which SEIU was a party. Even so, the County has provided SEIU with all MOUs within its possession. The County further objects to SEIU's request for information that was already provided by the County during the course of negotiations. Subject to these objections, below is a summary explaining the information provided, or the reason information is not provided.



Response to SEIU RFIs  
December 4, 2013  
Page 2

**November 20, 2013 Request**

**Request No. 1**

The information requested is not available at this time. The County is still in the process of closing the books and will have this information available on or before March 31, 2014.

**Request No. 2**

The information requested is not available at this time. The County is still in the process of closing the books and will have this information available on or before March 31, 2014.

**Request No. 4 C&D&F**

The County does not maintain a record responsive to this request. The County does not maintain overtime records budgeted by position, nor does it budget overtime by position.

**Request No. 5 & 6**

Information responsive to this request was already provided to SEIU in a prior response to a request for information provided during negotiations.

**Request Nos. 10 & 11**

The County does not maintain information responsive to this request.

**Request Nos. 16 & 17**

Information responsive to this request was already provided to SEIU in a prior response to a request for information provided during negotiations.

**Request Nos. 18 & 21**

The figures in SEIU's Appendix B & D to this request are based on Fiscal Year 2013/2014, as explained by the County during the presentation to SEIU during negotiations. Please refer to your bargaining notes.

**Request No. 23**

The County objects to this request on the grounds that it is vague, ambiguous, overly burdensome, and overbroad. The County does not maintain a record responsive to this request.



Response to SEIU RFIs  
December 4, 2013  
Page 3

SEIU can obtain this information by reading the annual budget and reading the agenda item presented with the budget.

#### **Request No. 24**

The County is currently in the process of putting together a compensation study for fact-finding, and is reviewing those most comparable to San Benito based on public agencies with similar population and demographics. Based on the expired MOU's Article 8.14, the County will collect data from Monterey and Santa Cruz Counties; however, the County does not view them as comparable public agencies.

#### **All additional Requests**

By separate email from Gil Wimmer of my office, you will receive a link to documents responsive to these requests contained in a dropbox entitled Hightail. Information responsive to these requests is also available at the following locations:

<http://www.sbcvote.us/auditor.htm>

<http://publicpay.ca.gov/Reports/Counties/County.aspx?entityid=35&fiscalyear=2011>

<http://cosb.us/wp-content/uploads/FY2013-2014-RECOMMENDED-BUDGET.pdf>

#### **November 26, 2013 Request**

#### **Request No. 17**

Information responsive to this request was already provided to SEIU in a prior response to a request for information provided during negotiations.

#### **Request No. 20**

There is no ordinance responsive to this request.

#### **Request No. 21-22**

The County objects to this request on the grounds that it is vague, ambiguous, overly burdensome, and overbroad. Notwithstanding this objection, the County directs SEIU to the following location which contains all minutes and agendas for Board of Supervisor meetings:

<http://www.cosb.us/government/meetings-agendas/meeting-archives/#.Up9x04eA2UI>



Response to SEIU RFIs  
December 4, 2013  
Page 4

### **Request No. 23-26**

The County objects to these requests to the extent they call for an interpretation of a document. The County's proposal on retiree health speaks for itself and was thoroughly discussed during the course of negotiations. The County directs SEIU to its legal counsel to respond to this request.

### **All additional Requests**

By separate email from Gil Wimmer of my office, you will receive a link to documents responsive to these requests contained in a dropbox entitled Hightail. Information responsive to these requests is also available at the following locations:

<http://www.sbcvote.us/auditor.htm>

<http://publicpay.ca.gov/Reports/Counties/County.aspx?entityid=35&fiscalyear=2011>

<http://cosb.us/wp-content/uploads/FY2013-2014-RECOMMENDED-BUDGET.pdf>

### **December 3, 2013 Request**

The budget documents attached to this request were from the budget submitted to the Board of Supervisors. The budget provided by the County to the State Controller's office was updated and contained the correct titles, with the exception of one title on Schedule 10, Page 205 which has now been corrected. The County will re-file the budget with this one correction with the State Controller's office. The County is providing the corrected budget with this response, sent by separate email in the dropbox entitled Hightail.

Please contact me if you have any questions.

Sincerely,

Allyson Hauck

cc (via email only): Dania Torres Wong, Chief Negotiator for the County  
Ray Espinosa, Interim County Administrator  
Matt Granger, County Counsel