

Aram Chaparyan
City Manager of Torrance
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20 December 2023

Dear City Manager Chaparyan,

My name is Amy Parker. I am a Founding Member of the Open Information Collective, an organization dedicated to the promotion of open government, including through the obtaining of public records under laws such as the California Public Records Act (which the City of Torrance is subject to). I unfortunately must write to you today to discuss illegal and unethical behavior and conduct perpetrated by the City Clerk's Office, and to demand that the City cure and correct these violations immediately.

On October 19, 2023, I filed five public records requests with the City of Torrance (W011501-101923, W011502-101923, W011503-101923, W011504-101923, W011505-101923); three of these were with the City Council, one with the Torrance Police Department, and one with Torrance Transit. While not as helpful as in many cities, the responses on -01- and -03- were legally adequate; I do not contest them at this time. However, the other three requests have been completely and entirely mishandled, as I will detail in this letter.

All three of the contested requests have followed the same structure:

- 1. Illegal Extension.** Extensions of time are permitted under California law (Cal. Gov't. Code, §§ 7922.535(b-c)). However, these sections require that the official handling the request explicitly state the reason why (from the list of exceptions provided in subdivision (c)) why an extension is necessary. On no request did the City Clerk's Office provide a legal reason for their extensions. In fact, all of these extensions were filed on October 27, 2023.

From the desk of the Open Information Collective

"Without publicity, no good is permanent; under the auspices of publicity, no evil can continue."

F.M. Amy Parker, A.A.

F.M. Monica Hanson

S.M. Fain Arquieta

2. **Response to Illegal Extension.** On all three requests, on the same day as these illegal extensions, I notified the City Clerk's Office that their actions were illegal, and that they must immediately cure and correct their actions. These demands received no responses.
3. **Illegal Second Extension.** Under no circumstances is a second 14-day extension legal under the CPRA; the total duration of any extensions must be no more than 14 days. Instead, on all three requests, on November 9, 2023, **Records Management Specialist Letitia Garcia** filed second extensions, refused to state a reason for the extensions, and refused to provide the (even extended) duration of these second extensions.
4. **Response.** I immediately informed her that this was illegal on the same day, but did not receive a response.

In the Torrance Transit case, there were more developments; she did provide links to commission meetings for some records. However, she has not addressed any of my allegations, corrected any of her CPRA violations, or finalized that request. I have sent multiple lines of inquiry to her through the Torrance Public Records Center, and have received absolutely no communications.

It is typical with these letters confronting public agencies that I provide a detailed legal analysis of the agency's actions/claims and how they relate to the California Public Records Act. For these, please see <https://oic.amyip.net/index.php/letters-from-the-oic/>. However, the violations here are so blatant - with staff refusing to answer any emails for months - that I believe such an analysis is unnecessary and would only legitimize this conduct. I demand immediate action by your office to correct these violations of the law, and that the records sought in my requests be promptly delivered.

Sincerely,

Amy Parker, A.A.

she/her/hers

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