



October 30, 2014

Via Regular U.S. Mail and Email to JRose@POYNERSPRUILL.COM

Richard J. Rose
City Attorney, Rocky Mount
Poyner Spruill LLP
P.O. Box 353
Rocky Mount, NC 27802-0353

Re: The Community Council, September 10, 2014, Records Request

Dear Mr. Rose:

Thank you for speaking with me yesterday, and thank you for your email this morning. As we discussed, my client has received some records from your office in response to the above-reference request, and for that I thank you and the City. I thought it might be helpful to you in your conversations with the City to have a broader written explanation of what is lacking from the records produced.

In its September 10, 2014, letter to your office, my client requested copies of "all expenses paid directly or indirectly on behalf of the City of Rocky Mount Manager, Mayor and all City Council members for the past five (5) years ... itemized per individual..." The information the City has provided amounts to little more than a ledger of expenses containing virtually no details. For example, line items for "Accounts Payable" without elaboration as to what expenses were paid or for whom. Please ask your client to supplement its production to include all documents from which the following information can be derived:

1. **All** expenses paid directly or indirectly on behalf of the City of Rocky Mount Manager, Mayor and all City Council members for the past five (5) years;
2. The person on whose behalf each expense identified in number 1, above, was paid;
3. The recipient of each expense payment identified in number 1, above;
4. The amount of each expenses identified in number 1, above;
5. The specific nature of each expense identified in number 1, above.

If you have any question as to the scope of this request, please do not hesitate to contact me. To the extent you feel this list broadens or expands the September 10, 2014, request, please treat this as an independent records request for the information requested in this letter.

My client also requested "for this information to be provided in electronic format, on a disk or thumb drive." N.C. Gen. Stat. § 132-6.2 (a) provides that a person seeking "may elect to obtain them in any and all media in which the public agency is capable of providing them." Please ask the City to provide both the previously produced records and the additional records requested in electronic format, such as an excel spreadsheet. As we have discussed, my client is willing to go to the City's offices and examine the records, provided they also receive an electronic copy.

If you believe that the charges for these records will exceed \$30.00, please contact me in advance of production.

Again, we are grateful for the records your client has produced thus far, but we feel they are lacking and my client would like to receive all records sought in electronic format.

Should you have any questions regarding this request, you may contact me directly.

Very truly yours,

STEVENS MARTIN VAUGHN & TADYCH, PLLC



Brandon J. Huffman

cc: The Community Council, Inc.