



Item 08 -Executive Director's Report - May 2025

Francis Upton IV, Chair
Tanya Bayeva, Vice Chair
Alea Gage
Ryan Micik
Vincent Steele
Karun Tilak

Nicolas Heidorn, Executive Director

TO: Public Ethics Commission
FROM: Nicolas Heidorn, Executive Director
DATE: May 7, 2025
RE: Executive Director's Report for the May 21, 2025, Regular PEC Meeting

This memorandum provides an overview of some of the Public Ethics Commission's (PEC's or Commission's) most significant activities since the last ED report and significant upcoming activities which were not included in other program reports, including a discussion of staffing, budget, and policy initiatives.

Executive Director Search

In April 2025, Executive Director Heidorn announced he would be stepping down from the Commission, effective July 7, 2025. On April 28, the Commission opened up its recruitment for a new Executive Director. Applications are being accepted [now through June 2](#).

The selection of the PEC's Executive Director is governed by Section 603(g)(4) of the City Charter, which provides (emphasis added):

The Executive Director shall serve at the pleasure of the Commission. By an affirmative vote of at least four (4) members, the Commission may terminate the Executive Director. ***Upon a vacancy, the Commission shall conduct a search for the Executive Director with staff assistance provided by the City Administrator. Upon completion of the search and its vetting of applicants, the Commission shall select two or three finalists and forward the selections to the City Administrator, who shall select one as the Executive Director.*** The City Administrator shall not have the authority to remove the Executive Director. The Commission shall periodically conduct a performance review of the Executive Director.

PEC Staff have taken the following actions to publicize the job recruitment:

- Posted the opportunity to the PEC's website and social media accounts and shared the opportunity by email to the PEC's listserv;
- Shared the posting with key partners and stakeholders, including the executive directors of other local ethics commissions, good government organizations, and former PEC staff;
- Posted to the jobs boards of, or purchased ads with, the following organizations/platforms: Council on Governmental Ethics Laws (COGEL), American Bar Association, California Lawyer's Association, Alameda County Bar Association, San Francisco Bar Association, California District Attorneys Association, Daybook, Morning Report, and LinkedIn; and

- Shared the posting with the following additional bar associations: Minority Bar Coalition of the SF Bay Area, Filipino Bar Association of Northern California, South Asian Bar Association of Northern California, Black Women Lawyer's Association of Northern California, California Association of Black Lawyers, Asian American Bar Association of the Greater Bay Area, East Bay La Raza Lawyer's Association, and Bay Area Lawyers for Individual Freedom.

Commissioners and members of the public are encouraged to widely share this job posting to encourage a broad, diverse, and talented pool of applicants.

Following prior practice, Chair Upton has established an Executive Director Recruitment Subcommittee, consisting of himself (Chair), Commissioner Micik, and Commissioner Bayeva, to do a first review of all the applications that are received and forward the most qualified applicants to the full Commission for review in closed session at a future meeting. Pursuant to the Charter, the Commission shall select two to three finalists and forward them to the City Administrator for selection of the next Executive Director.

Proposed FY25-27 Budget

According to a February 20, 2024, report by the Department of Finance, the City is facing approximately a \$140 million ongoing structural deficit. As part of the City's budgetary process, each Department, including the PEC, was given a budget target to assist the City in closing this deficit. On May 5, 2025, Interim Mayor Jenkins released his Proposed FY25-27 Budget. The budget proposes significant reductions, including eliminating more than 400 mostly vacant positions.

As with the FY 23-25 Budget, the Proposed FY25-27 Budget includes significant reductions to the spending and staffing minimums generally required by Measure W (2022) and the City Charter but the proposed budget does include some important improvements over the prior budget for the PEC, particularly to strengthen the Commission's Enforcement Unit.

Proposed Budget highlights include:

- **No cuts to GPF-funded staff positions.** All currently budgeted staff positions are retained. However, the PEC's Democracy Dollars Outreach Specialist position, which was funded with a Haas Jr. grant, was not included in the budget. This position will sunset after July 1, although some extension using remaining grant funds may be possible. The budget does provide for the addition of an Ethics Analyst II in the last 6 months of FY26-27, which could be used to provide similar outreach if the PEC is implementing Democracy Dollars in 2028.
- **Adds a second Investigator and a part-time law clerk** to support the Enforcement Unit. With these additions, Enforcement Unit staffing will increase from 2 full-time equivalent (FTE) positions to 3.1 FTE. The Budget also includes a \$20,000 increase to O&M, which Commission Staff intends to use for additional contract support for the Enforcement Unit and incoming Executive Director. These are important and timely additions to support the Commission's critically understaffed Enforcement Unit; however, this staffing level still falls below the 5 FTE minimum (1 Enforcement Chief, 3 Investigators, and 1 Staff Attorney)

that the PEC estimates is necessary to address its incoming caseload and make significant progress on its complaint backlog.

- **Replaces the Administrative Assistant II position with an Ethics Analyst I position.** This higher-level staff position will provide greater support for the Commission's compliance activities, freeing up additional staff capacity in the enforcement and regulatory programs to conduct investigations or provide greater client support.
- **Cuts most mandated Democracy Dollars Program funding.** Under Measure W, each budget cycle, the City is required to fund \$4 million in Democracy Dollars vouchers, \$350,000 for administrative costs, and four staff positions to implement the Program. These minimums may be suspended with the declaration of an "extreme fiscal necessity," which occurred last budget cycle. This Proposed Budget would again declare the existence of an extreme fiscal necessity and eliminate all funding for Democracy Dollars vouchers and administrative funding, which will necessarily postpone implementation of Democracy Dollars to 2028 at the earliest.
- **Does not include Limited Public Financing (LPF) funding.** Last cycle, the Council budgeted \$155,000 over two years to restore the LPF for the 2024 cycle, after the Democracy Dollars Program was postponed. The LPF Program expired after 2024 and this budget does not continue that funding. As a result, if Democracy Dollars is again postponed and the LPF is not restored, 2026 will be the first election in more than two decades without any public financing in Oakland, despite Oaklanders voting to strengthen public financing with Measure W.

Chair Upton and PEC Staff will engage with the City Council to support the enhancements proposed in this budget and to seek additional amendments, consistent with the Commission's previously-articulated budget priorities, to: 1. maintain existing staffing; 2. bring Enforcement Unit staffing to 3 Investigators and 1 staff attorney; and 3. reinstate and fund the LPF Program for 2026.

The FY 25-27 Budget must be adopted by July 1, 2025.

New Office Location

For the past year, Commission staff has been seeking new office space to accommodate the growth in PEC programs. In particular, the PEC needs additional space to meet its Charter-mandated minimum staffing needs, to provide space for temporary staff such as law clerks and management interns, and longer-term to provide sufficient space to process the tens of thousands of vouchers that the Commission will receive once the Democracy Dollars Program is implemented.

In April, the Commission received approval from the City Administrator to move all its staff into a new suite at 250 Frank Ogawa Plaza, across from City Hall, which better meets the Commission's operational needs now and into the future. The new suite will enable the Commission to have all PEC staff work in one location and provides sufficient floor space to accommodate staff growth and Democracy Dollars logistics needs. The new location will also provide greater confidentiality for the PEC's Enforcement Unit and security for PEC files. The exact timing of the move is still in

flux. However, Staff will likely complete the move over the summer months. Once the final move date is fixed, Staff will announce the new location broadly and notify interested parties, such as filers, vendors, and contacts, directly.

Staff thanks City Administrator Jestin D. Johnson and his staff for their assistance securing the PEC's new home and their ongoing support throughout the move.

Measure W Updates

Administrative Processes and Technology – In May, Staff concluded negotiations with vendor MapLight to design, build and implement the Democracy Dollars software platform. The completed contract and supporting documentation now go to the City Administrator for final approval.

General Outreach and Community Engagement – Staff continued to initiate informal meetings with stakeholders to introduce the Democracy Dollars Program and identify potential partnerships to provide input and increase our reach to residents with historically lower rates of voter and donor participation. On April 21, Commission staff debuted an interactive presentation to introduce Democracy Dollars before the Youth Commission. The presentation is designed to encourage dialogue, build on-going relationships with stakeholder groups, and collect input regularly via a post-presentation questionnaire. An analysis and summaries of input gathered from these presentations and the questionnaire will be shared at future meetings as we collect more data and included with in the Commission's outreach plan. Upcoming presentations include the Mayor's Commission on Persons with Disabilities (MCPD) on May 19, and the Oakland Chinatown Coalition on May 21.

Executive Director Transition

ED Heidorn will be stepping down from the Commission on July 7, 2025. If a new Executive Director is not selected and in place by that time, Interim Program Manager Suzanne Doran will be made Acting Executive Director until a permanent Executive Director is appointed.

In his remaining two months, Director Heidorn will be focusing on engaging with the City's budget process; assisting in the ED recruitment process; initiating or completing staff hiring, including for the permanent Program Manager position; creating a transition memo and training materials and guides for the new Executive Director; finalizing a revenue-generating ballot measure, following Commission guidance; and adopting work plans for employees.

Major commission administrative priorities through the end of this year, which a new Executive Director or Acting Director Doran will have to complete, include:

- Migrating the PEC's current website to the City's new website platform;
- Completing the PEC's office transition from City Hall to 250 Frank H Ogawa Plaza;
- Permanently filling several PEC positions and potentially recruiting and hiring for new positions, depending on the adopted budget;

- Working with the Administration to adopt several service contracts, especially supporting the Enforcement Program, and finalizing the MapLight contract;
- Coordinating with councilmembers and stakeholders on a revenue ballot measure, should the Commission choose to pursue this option;
- Recruiting and filling two Commission-appointed seats to the Commission by the end of the year; and
- Scheduling and organizing a strategic planning retreat.

Disclosure and Regulatory Program Updates

Additional program updates relating to the Commission's disclosure and regulatory activities is attached to this report.

Additional Attachment: Disclosure Program Report

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Nicolas Heidorn, Executive Director

TO: City of Oakland, Public Ethics Commission
FROM: Alex Van Buskirk, Lead Analyst, Compliance and Disclosure
Jelani Killings, Lead Analyst, Education and Engagement
DATE: May 8, 2025
RE: Disclosure and Engagement Monthly Report for the May 21, 2025,
Public Ethics Commission Meeting

This memorandum provides a summary of major accomplishments in the Public Ethics Commission's (PEC or Commission) Disclosure and Engagement program activities since the last regular meeting. Commission Staff disclosure activities focus on improving online tools for public access to local campaign finance and other disclosure data, enhancing compliance with disclosure rules, and conducting data analysis for Public Ethics Commission projects and programs as required. Engagement activities include training and resources provided to the regulated community, as well as general outreach to Oakland residents to raise awareness of the Commission's role and services and to provide opportunities for dialogue between the Commission and community members.

Compliance with Disclosure Requirements (Includes April 15, 2025 Special Election Spending Analysis)

Commission Staff conducts filing officer duties as required by state and local law and aims to help candidates, lobbyists and City officials submit required disclosure reports and ensure residents can easily access campaign finance, lobbyist, and ethics-related data and information.

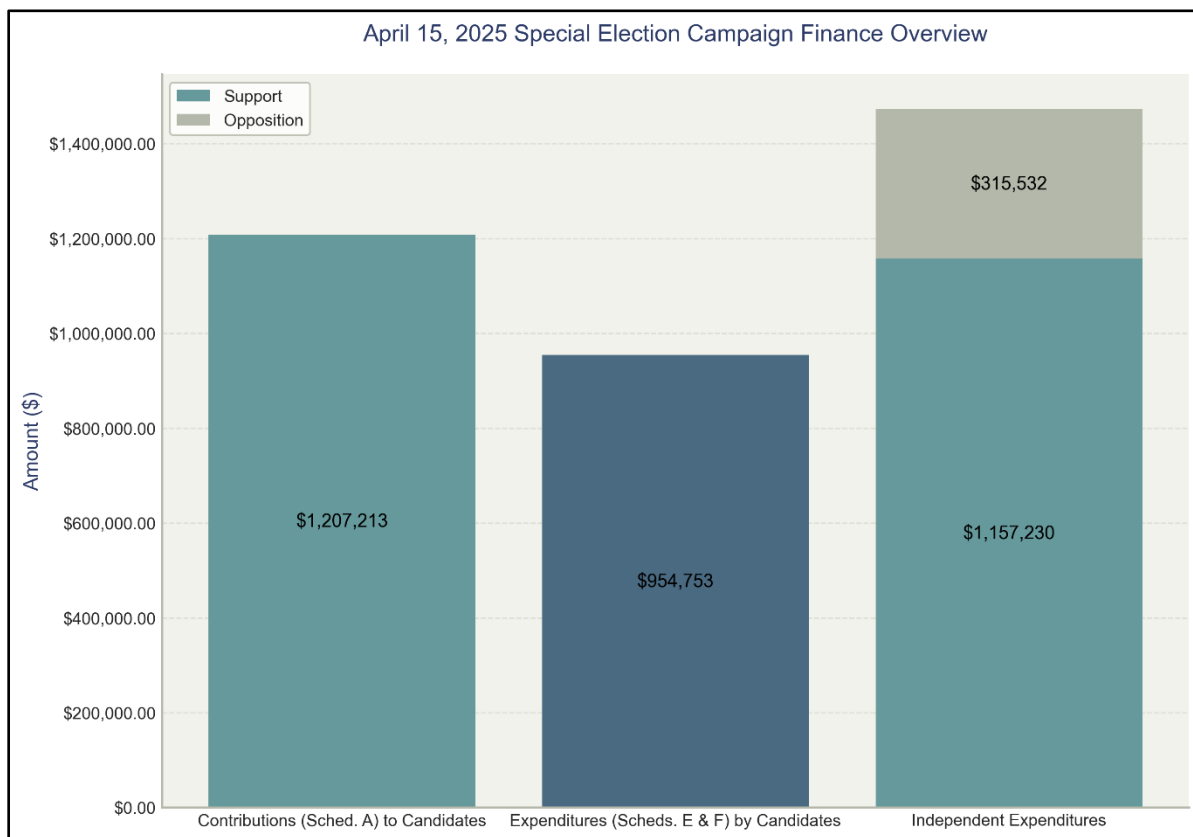
2025 Special Election Campaign Finance Disclosure – On April 15, 2025, there was a Special Election in the City of Oakland for the positions of Mayor and City Council District 2.

Commission Staff coordinated with the California Fair Political Practices Commission (FPPC) on setting up a special election filing schedule, which included pre-election statements, for the April 15, 2025 Special Election. Commission Staff provided the details of the Special Election filing schedule to relevant Oakland committees and included a copy of the schedule on the PEC website for education and information purposes.

The Special Election had two related filing deadlines – the First Pre-Election statement due March 6, 2025, covering activity from January 1, 2025 through March 1, 2025 and the Second

Pre-Election statement due April 3, 2025 covering activity from March 2, 2025 through March 29, 2025. All candidates appearing on the April 15, 2025 Special Election ballot were required to file these First and Second Pre-Election statements for their committees. These filings are made on either a Form 460 (for candidates raising or spending \$2,000 or more on their campaigns) or Form 470 (for candidates raising or spending less than \$2,000). Three candidates with committees did not file their required Form 460s and one candidate did not file a required Form 470. All four candidates have been referred to the Enforcement Unit for review.

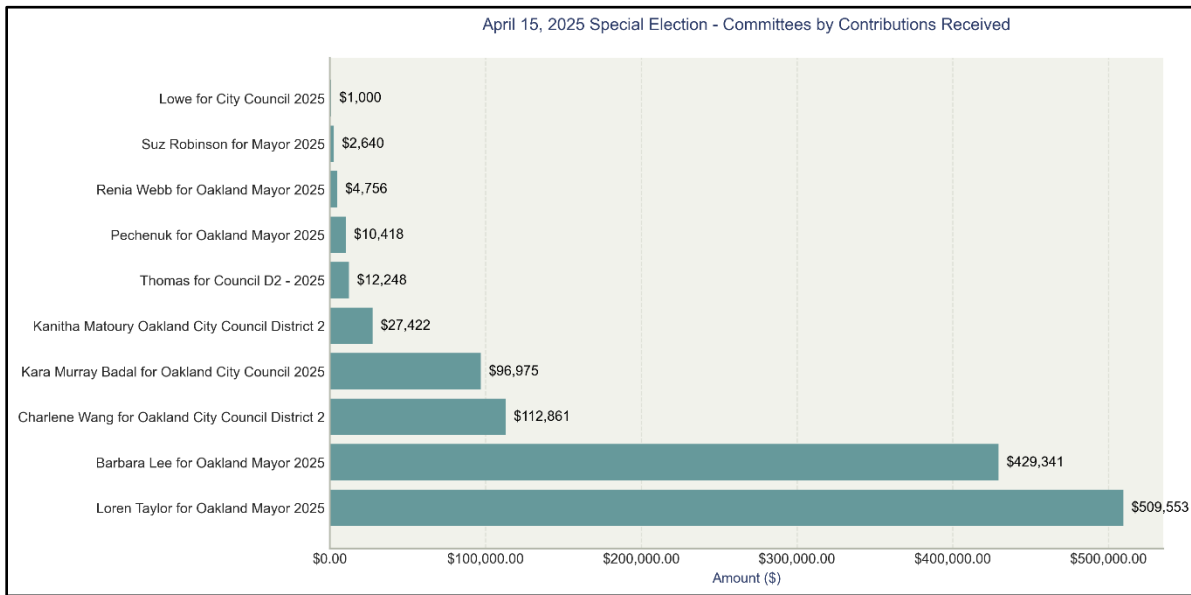
April 15, 2025 Special Election Spending Analysis¹ – The Oakland April 15, 2025 Special Election campaign finance landscape was characterized by significant financial activity across various committees and independent expenditure groups. A total of \$1,207,213 in contributions were raised by Mayoral and Council District 2 candidates, while total expenditures from these candidates amounted to \$954,753. Additionally, independent expenditures supporting or opposing these candidates reached a total of \$1,474,715, with \$1,157,230 towards support spending and \$315,532 towards opposition spending.



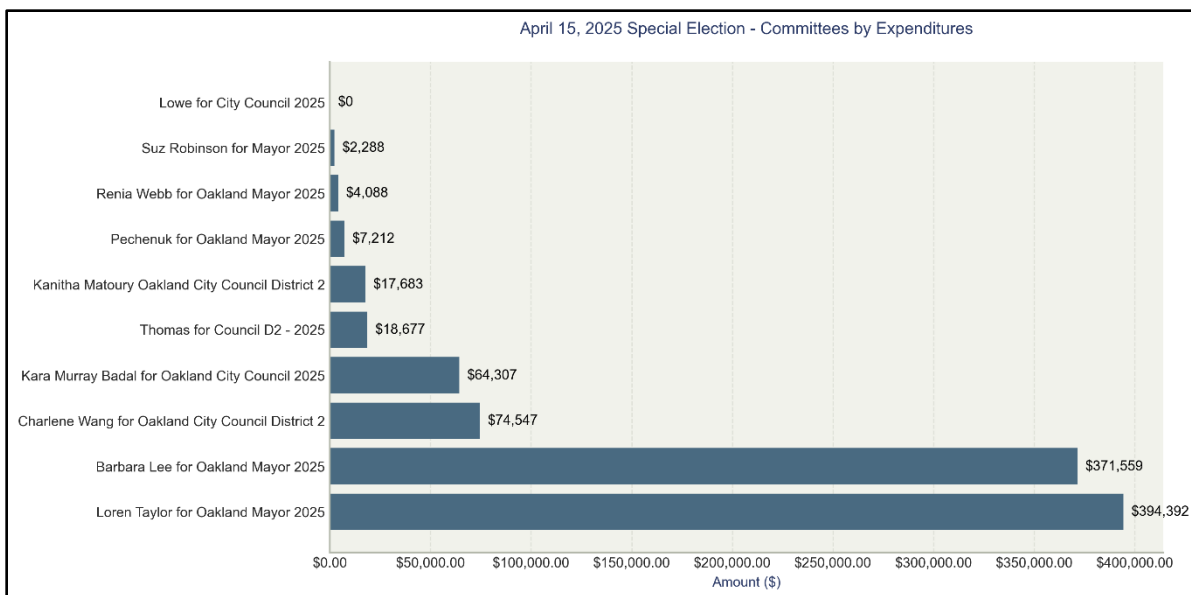
Among the top candidate committee fundraisers, the Loren Taylor for Oakland Mayor 2025 committee led with total contributions of \$509,553, followed by Barbara Lee for Oakland

¹ This is based on data from <https://public.netfile.com/pub2/excel/COAKBrowsable/> as reported (as is) by committees.

Mayor 2025 at \$429,341 and Charlene Wang for Oakland City Council District 2 at \$112,861. Other notable committees include Kara Murray Badal for Oakland City Council 2025 (\$96,975), Kanitha Matoury Oakland City Council District 2 (\$27,422), and Pechenuk for Oakland Mayor 2025 (\$10,418). Note this data is current through the latest reporting period for candidates, which is March 29, 2025. Contribution totals will likely change once contributions received through election day are reported on the semi-annual statement due July 31, 2025.

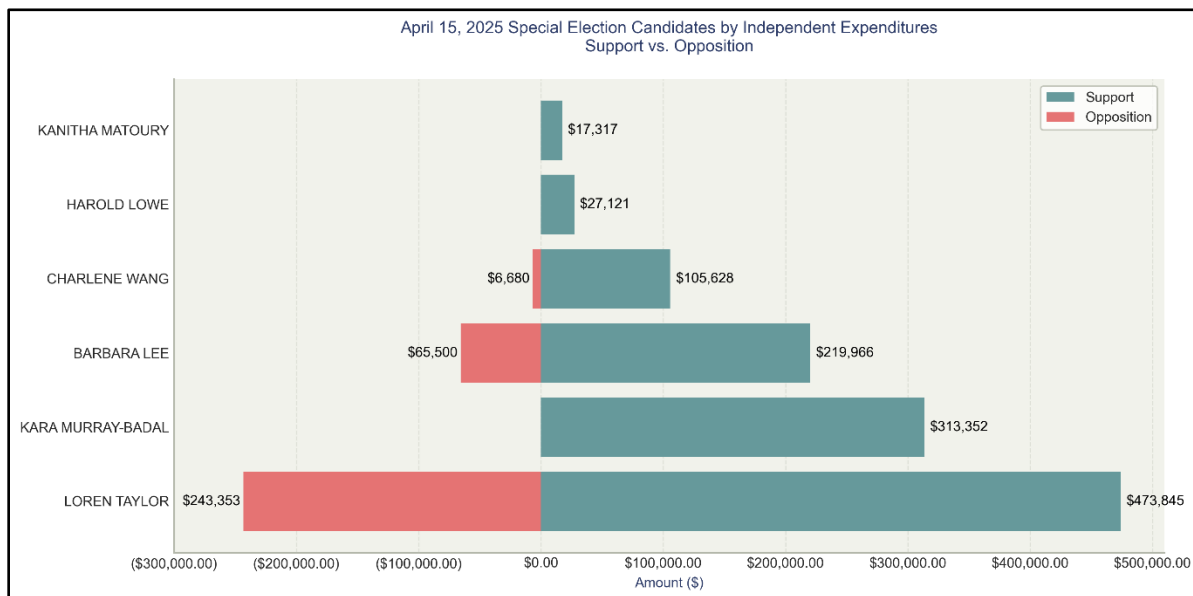


On the expenditure side, Loren Taylor for Oakland Mayor 2025 was again the highest spender at \$394,392. Barbara Lee for Oakland Mayor 2025 followed with \$371,559 in expenditures, while Charlene Wang for Oakland City Council District 2 spent \$74,547. The committee for Kara Murray Badal for Oakland City Council 2025 recorded expenditures of \$64,307, with Thomas for Council D2 - 2025 spending \$18,677.



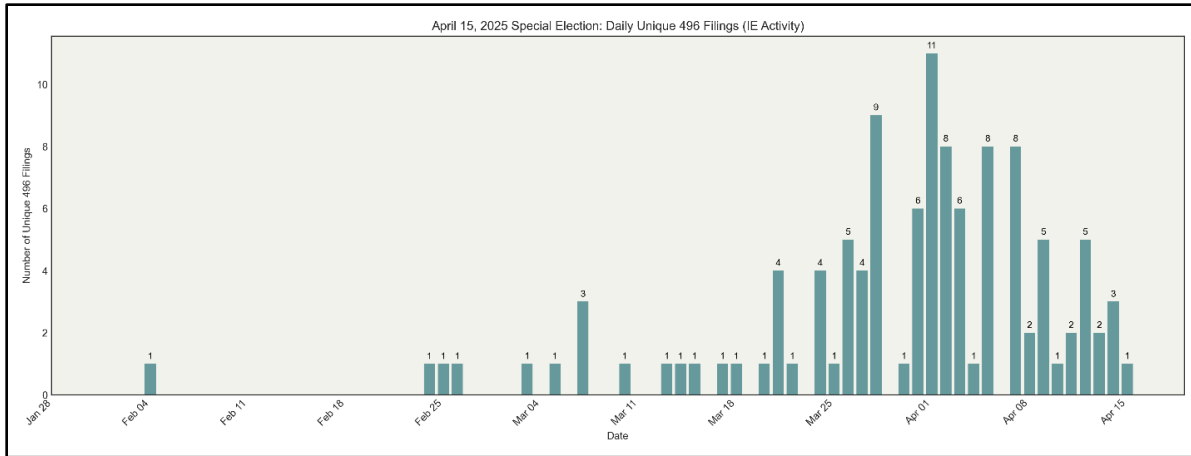
Independent expenditures were significant in the election. Loren Taylor had the highest total independent expenditure activity at \$717,197, which included \$473,845 in support spending and \$243,352 in opposition spending by independent expenditure committees. Kara Murray-Badal followed with \$313,351 in total independent expenditures, all for support. Barbara Lee received \$219,966 in support spending and faced \$65,500 in opposition, bringing total independent expenditure activity to \$285,466. Charlene Wang, with no recorded opposition spending, benefited from \$105,628 in independent expenditure support.

Among other candidates receiving significant independent expenditures, Harold Lowe had a total of \$27,121 in independent support spending. Kanitha Matoury also received independent spending support, totaling \$17,317, with no reported opposition spending.



The time series analysis of Form 496 independent expenditure filings for the April 15, 2025 Special Election reveals a pronounced surge in activity as Election Day approached. While filings were sporadic and relatively low throughout February 2025 and early March 2025, with most days seeing zero or just one filing, the volume of filings began to increase steadily in mid-March 2025.

Notably, there was a significant spike at the end of March 2025 and the beginning of April 2025, with the single highest day recording 11 filings. This peak likely reflects the final push by independent expenditure committees in the April 15, 2025 Special Election’s closing weeks.



Campaign statements are available to view and download at the Commission’s [Public Portal for Campaign Finance Disclosure](#). Campaign finance data, graphs, and visualizations are available via the [City’s Open Data portal](#) and the Commission-sponsored app [Open Disclosure Oakland](#), as well as links on the PEC website.

Illuminating Disclosure Data

Open Disclosure Oakland – The [opendisclosure.io](#) campaign finance app was live with the data for the April 15, 2025 Special Election. Open Disclosure Oakland, a nonpartisan tool, was developed by volunteers from [OpenOakland](#), a civic technologist group, in partnership with Commission Staff to give all Oakland residents equal access to campaign finance data. The Open Disclosure Oakland website shows funds donated to both political candidates and ballot measure committees and provides clear summaries of money raised and spent as well as financial trends for each election. The website also includes a search function that makes campaign donation records easy to search and sort and allows users to search campaign donors by name across multiple campaigns and elections.

Open Disclosure Oakland is updated regularly with data imported directly from the [City’s campaign finance database](#) and includes a notification system that sends subscribers alerts about new campaign reports.

As in prior elections, the PEC purchased advertisements to increase public awareness of these transparency tools. Analytics about response rates and website viewership will follow in a future Disclosure and Engagement Report update.

Lobbyist Registration Program – The Oakland Lobbyist Registration Act (LRA) requires any person that qualifies as a lobbyist to register annually with the Commission before conducting any lobbying activity. Registration renewals were due January 31, 2025.

To date, as of May 8, 2025, 47 lobbyists are currently registered with the City of Oakland for 2025. All lobbyists have paid the \$500 fee upon registration, thanks to the new point-of-sale (POS) system created and implemented with the assistance of the Information Technology Department.

April 30, 2025 was the deadline for lobbyists in Oakland to file their Quarterly Activity Report for Quarter 1 2025. As of May 5, 2025, 44 lobbyists have filed for Q1 2025, two have not yet filed, and two filed late (one lobbyist registered after the Q1 2025 period and is not required to file). Commission Staff is in the process of issuing a late fee notice to the two lobbyists who filed late, and has issued notifications to the two lobbyists who still have not yet filed.

In November 2023, the Oakland City Council adopted amendments to the Lobbyist Registration Act including a new requirement that lobbyists take a training provided by the Commission. Under PEC Rules, lobbyists have 60 days from their date of registration to complete the training, which is required every two years. Because most lobbyists took the training last year, they are not required to take it this year. Commission Staff is working with two new registered lobbyists to ensure full compliance with this training requirement.

An up-to-date list of registered lobbyists and lobbyist activity reports with links to view and download individual reports is available at the Public Ethics Commission's [Lobbyist Dashboard and Data](#) webpage.

Advice and Engagement

The Commission's Advice and Engagement Program seeks to ensure Oakland public servants, candidates for office, lobbyists, and City contractors understand and comply with City campaign finance, ethics, and transparency laws.

Advice and Technical Assistance – Between January 2025 and May 2025 (partial), Commission Staff has responded to 59 requests for information, advice or assistance regarding campaign finance, ethics, Sunshine law, or lobbyist issues.

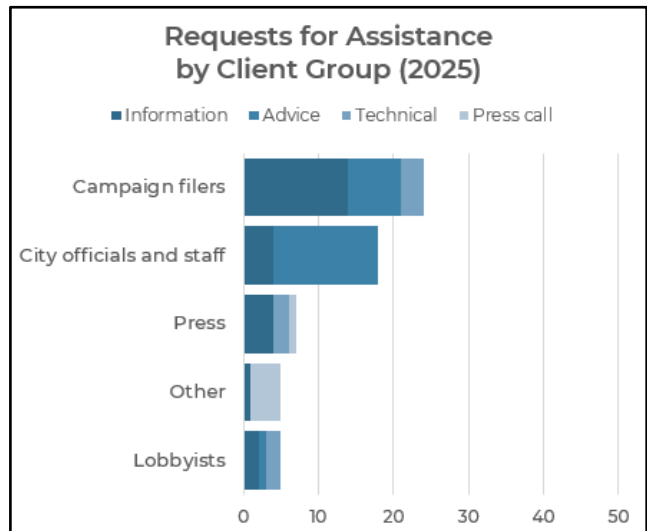
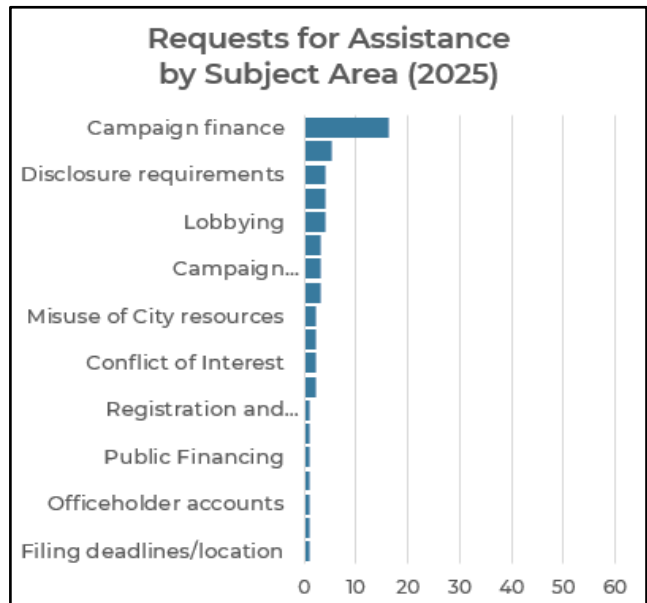
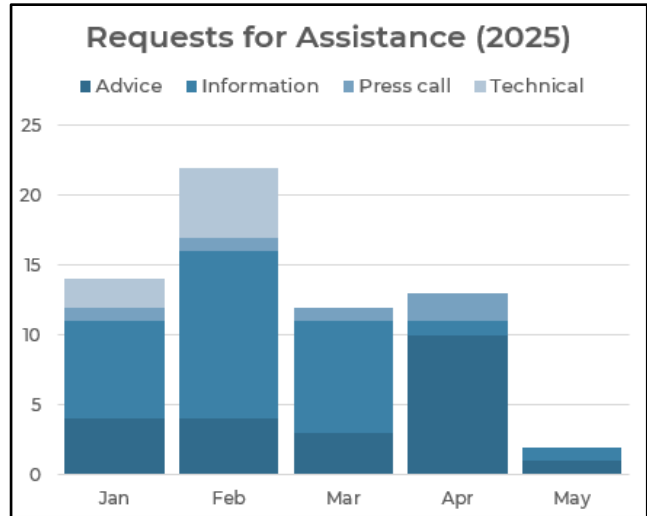
New Employee Orientation – Commission Staff continues to make presentations at the City's monthly New Employee Orientation (NEO) providing new employees with an introduction to the Public Ethics Commission and overview of the Government Ethics Act (GEA).

In the months of March and April, Commission Staff provided an overview of the City’s ethics rules to 21 new City employees. Employees required to file Form 700 disclosure statements were also assigned the Commission’s mandatory online Government Ethics Training for Form 700 filers.

Website Migration – On April 2, 2025, Staff participated in the City’s Content Publisher training for employees assigned to manage their department’s webpages. Staff has been given access to the City’s new content management system to edit pages on the new City website. The new site will go live this summer.

Ethics Check-Ins – On March 17, 2025, Commission Staff conducted an ethics check-in with Councilmember Fife and her staff to provide an overview of the Commission and its work, and to share information about recent changes in both local and state ethics and transparency laws. Topics covered included gift rules, changes to the Lobbyist Registration Act, social media disclaimer requirements, changes to the state’s Levine Act regarding limitations on campaign contributions to local elected officials from certain parties and disqualifications based on past campaign contributions, and future outreach opportunities.

Check-ins allow Commission Staff to better understand the support needs of elected officials and their staff in complying with local ethics laws. Commission Staff also shared about ethics training requirements and provided a link to the PEC’s ethics resource binder.



PEC Advisories – As part of our continuing education efforts, Commission Staff issues routine advisories to ensure that stakeholders subject to the laws under the PEC’s jurisdiction are aware of local rules impacting them. On March 12, 2025, Staff sent an advisory to campaign filers regarding social media account disclaimers.

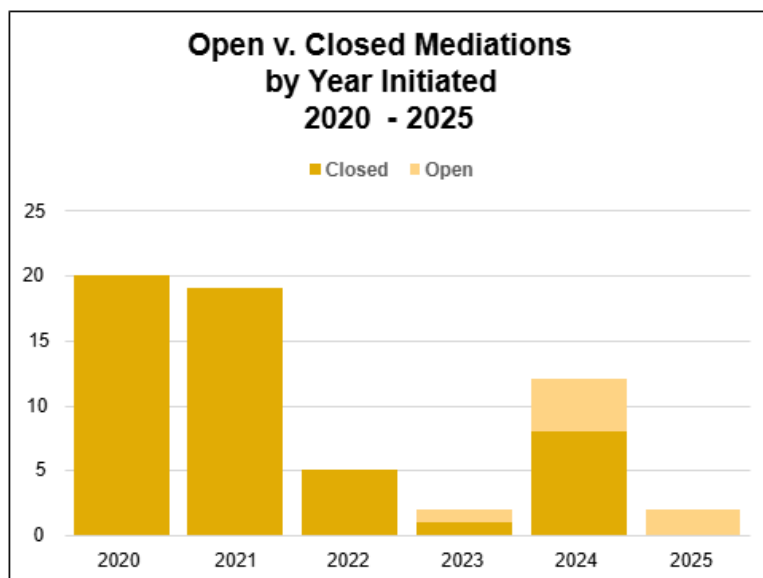
Joint Outreach with City Auditor and Inspector General – In collaboration with the City Auditor and the Office of the Inspector General, Staff coordinated a joint outreach initiative titled “Meet Your Accountability Officers.” This effort is aimed to inform the public about the distinct roles and responsibilities of each office in promoting transparency, integrity, and accountability within city government. The following presentations were made in March 2025:

Date	Group	Presenter
March 20, 2025	West Oakland NEST	Director Heidorn
March 25, 2025	West Oakland Neighbors	Chair Upton

Mediation Program

Pursuant to the Oakland Sunshine Ordinance, the Commission conducts mediation of public records requests made by members of the public to City departments for records within the department’s control. The PEC currently has 7 open mediations. Since the last Commission meeting, the Commission received 1 new request for mediation, and 3 mediations were completed. The closed mediations, attached to this memo, were:

- M2024 – [05-07]: *In the Matter of the Office of the City Council (Mediation Case No. M2024-05, M2024-06, M2024-07; Mediation Summary)*



Online Engagement

Social Media – In March 2025 and April 2025, Commission Staff continued producing monthly social media content, including posts highlighting PEC meetings, Open Data Week, campaign filing deadline, PEC outreach, and the open Executive Director application.

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Nicolas Heidorn, Executive Director

TO: Public Ethics Commission
FROM: Jelani Killings, Ethics Analyst
Teddy Teshome, Administrative Analyst
DATE: May 2, 2025
RE: *In the Matter of the Office of the City Council (Mediation Cases No. M2024-05, M2024-06, M2024-07; Mediation Summary)*

I. INTRODUCTION

On April 26, 2024, the Commission received a request for mediation alleging that three City Council offices failed to respond to individual public records requests made by the Requestor. Staff initiated its mediation program on May 3, 2024, pursuant to the Oakland Sunshine Ordinance.

Because records were released for one of the three requests after mediation was initiated, and the Requestor has not replied to Staff communications regarding whether they are still interested in pursuing the mediation, this mediation was closed with no further action.

II. SUMMARY OF LAW

One of the primary purposes of the Oakland Sunshine Ordinance is to clarify and supplement the California Public Records Act (CPRA), which requires that all government records be open to inspection by the public unless there is a specific reason not to allow inspection.¹ The CPRA requires each agency to make public records promptly available to any person upon request.²

Any person whose request to inspect or copy public records has been denied by any City of Oakland body, agency, or department, may demand mediation of their request by Commission Staff.³ A person may not file a complaint with the Commission alleging the failure to permit the timely inspection or copying of a public record unless they have requested and participated in the Commission's mediation program.⁴

Once the Commission's mediation program has concluded, Commission Staff is required to report the matter to the Commission by submitting a written summary of the issues presented, what efforts

¹ Oakland Municipal Code § 2.20.010(C); Government Code § 7920.000 et seq.

² Government Code § 7922.530(a).

³ O.M.C. § 2.20.270(C)(1).

⁴ O.M.C. § 2.20.270(F).

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were made towards resolution, and how the dispute was resolved or what further efforts Commission Staff would recommend to resolve the dispute.⁵

III. SUMMARY OF FACTS

On December 28, 2023, the City received a total of three records requests via NextRequest from the Requestor to individual City Councilmembers (23-12521, 23-12522, 23-12547).

The records request asked for all “writings” involving communication between Councilmember [Bas, Gallo, Jenkins], Jewish groups, Palestinian groups, Arab groups, and Muslim groups. The records request also asked for writings between Councilmember [Bas, Gallo, Jenkins] and other members of the Council between Councilmember [Bas, Gallo, Jenkins] and the City Administrator concerning the ceasefire resolution from November 27, 2023. Finally, the records request asked for all writings between Councilmember [Bas, Gallo, Jenkins] and Oakland officials concerning security arrangements for the November 27, 2023 City Council hearing.

On April 26, 2024, the PEC received a mediation request from the Requestor stating that the individual council offices failed to respond to the public records requests. Subsequently, Staff initiated mediation.

The table below provides a status summary of the three public records requests by the Requestor:

NextRequest Number	NextRequest Status	Documents added after mediation notification	Additional Notes
23-12521	Closed	Yes	Stated that all requested documents have been released.
23-12522	Closed	No	On 6/26/24 Staff was informed by the Requestor that he had interacted with Councilmember Jenkins and was content with the outcome of the conversation and that he was okay with closing the records request and the accompanying mediation.
23-12547	Open	No	On 7/9/2024, the responsive office stated that per the information technology department, they have found no documents that support the requested criteria.

On March 4, 2025, Staff reached out to the Requestor to inquire if they were still interested in pursuing the mediation. Staff also informed them that if there was no response, the mediation

⁵ Complaint Procedures § IV (C)(5).

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would be closed. No response was received from the Requestor. A follow-up email was sent on March 24, 2025, but no response was received.

IV. RECOMMENDATION

Responsive documents were provided for one of the three public records requests (PRR 23-12521). The Requestor indicated to Staff that they were ok with closing the PRR relating to 23-12522. Since the other responsive office indicated that they had no documents related to PRR 23-12547 and the Requestor has not replied to Staff communications regarding whether they are still interested in pursuing the mediation, this mediation is closed with no further action.