

Item 3. D. 1

CORRESPONDENCE TABLE:

AUTHORED BY COUNSEL FOR J. WHITE, LISTING SUBSTANTIALLY ALL LETTERS EXCHANGED BY J. WHITE COUNSEL AND COUNSEL FOR COUNTY OF PLUMAS AND FOR FEATHER RIVER COLLEGE DISTRICT, AND BY J. WHITE COUNSEL AND FEATHER RIVER TOURIST ASSOCIATION/DISTRICT.

DATE OF CORRESPONDENCE PAGE COUNT		TO/FROM	FORM OF CORRESPONDENCE (I.E., LETTER OR EMAIL)	CUMULATIVE FEES INCURRED AS DATE INDICATED
1.	September 6, 2023	To: Treasurer/Tax Collector From: Nancy Selvage,	Email, apparently the combined work product of N. Selvage and non-signatory D. Lucero.	\$0
2.	September 18, 2023 / 4 pages	To: Sara James (Interim County Counsel) From: Christopher J. Bakes	Letter, summarizing matter, including contesting Selvage memo on merits, as violation of Brown Act, as improper delegation by the Board, and as violation of protocols associated with elected officials versus those associated with employees..	\$6502
3.	September 28, 2023	To: [To whom it may concern.] From: Feather River Tourism Association	Letter "To whom it may concern," alleging that Tax Collector's office not cooperative with FRTA, impeding its mission and threatens litigation against the County." (Please see C. Bakes letter dated November 13, 2023, below.)	\$11432
4.	September 29, 2023 / 4 pages	To: Christopher J. Bakes From: Jack Hughes (outside retained counsel for County)	Letter, responding to C. Bakes letter dated September 18, 2023, contesting all assertions. <i>County claims that the third full paragraph on p. 2 of this letter contains privileged information and requests that it not be made public, including that it pertains to a closed session on August 15, 2023, where, among other items, the litigation threat by FRTA was to be discussed.</i> We do not accept this as privileged. The August 15, 2023, meeting could not have been closed due to the FRTA threat of litigation, since that threat did not arrive until September 28, 2023 by a tourist board letter dated the same day. (Please see entry below for C. Bakes letter dated November 13, 2023. See also entries below for October 9, 2023, October 18, 2023, and October	\$13066

			20, 2023, where County's other assertions of privilege are addressed.)	
5.	October 9, 2023	To: Sara James / Jack Hughes From: Christopher J. Bakes	Letter, providing further detail, identifying errors of fact and analysis, tallying 14 different Brown Act violations. Requests payment of J. White's fees based on numerous Brown Act violations (citing case law), the unrelenting targeting of J. White, and the resulting representational conflict. <i>County claims privilege as to Enclosure 1 to October 9, 2023 email between county attorney J. Brechtel and others within county government, including Ms. White. Without conceding legitimacy of privilege claimed, item will be redacted to reflect the date, sender, recipients, subject line, and subject/topic only. See J. Hughes email dated October 25, 2023, to C. Bakes.</i>	\$24450
6.	October 16, 2023 / 3 pages	To: Sara James / Jack Hughes From: Christoher J. Bakes	Email, noting late delivery of email dated October 10, 2023, regarding late invitation to J. White to testify.	\$32590.5
7.	October 17, 2023 Board Meeting			\$34205.5
8.	October 18, 2023 / 5 pages	To: Board, with cc to S. Hughes, at S. Hughes' request From: Christopher J. Bakes	CPRA request, directed to Board via K. Rogers. Still pending; incremental compliance.	\$36033
9.	October 18, 2023	To: Julie White From: Sara James	Email, inquiring whether J. White needs S. James' assistance in responding to College District. <i>County claims privilege as to this email from county attorney S. James and Ms. White. (See entry for October 20, 2023, below.) Without conceding legitimacy of privilege claimed, item will be redacted to reflect the date, sender, recipients, subject line, and subject/topic only. See J. Hughes email dated October 25, 2023, to C. Bakes.</i>	\$36033
10.	October 20, 2023 / 31 pages,	To: Sara James / Jack Hughes	Letter, attaching J. White FRTA response to College District, and	\$39683.5

	including exhibits.	From: Christopher J. Bakes	addressing basis for County Counsel recusal and payment of J. White's legal fees. <i>County claims privilege as to letter attachment consisting of email from county attorney S. James to Ms. White. Without conceding legitimacy of privilege claimed, item will be redacted to reflect the date, sender, recipients, subject line, and subject/topic only. See J. Hughes email dated October 25, 2023, to C. Bakes.</i>	
11.	October 24, 2023 /	To: Christopher J. Bakes From: Jack Hughes	Letter, contesting C. Bakes October 20, 2023, letter identifying grounds for payment of legal fees.	\$40,533.5
12.	October 24, 2023 / 7 pages	To: Christopher J. Bakes From: Jack Hughes / Sara James	Letter, contesting all claims of Brown Act violations. Acknowledges, Treasurer White's testimony before Board, October 17, 2023, a proposal C. Bakes had earlier made by letter. Letter states that September 6, 2023 Selvage Letter (memo) "is mooted but Ms. White can consider it 'withdrawn' if that helps her understand that Ms. Selvage won't be reaching out again." Selvage Letter not actually withdrawn. See January 2, 2024, entry, below, where D. Lucero reasserts all charges alleged in Selvage Letter.	\$40,533.5
13.	October 27, 2023 / 2 pages	To: Christopher J. Bakes From: Kristina Rogers	Letter, committing to comply with CPRA request served on County.	\$40609.5
14.	November 13, 2023 / 7 pages	To: Sara James / Jack Hughes From: Christopher J. Bakes	Letter, including direct evidence provided by S. Roberts that D. Lucero on September 28, 2023, insisted that the FRTA threaten in writing to sue the county. Also, rejects J. Hughes' October 24, 2023, letter's claim re defamation as unfounded on multiple grounds.	\$47314
15.	November 15, 2023 / 3 pages	To: Sara James / Jack Hughes From: Christopher J. Bakes	Email. Reiterating public records matters, and highlighting again S. Roberts' email showing D. Lucero instigated litigation threat against county.	\$50565
16.	November 16, 2023	From: Julie White To: Sara James	Form submission, "Request for County Counsel Services."	\$50565

			This was addressed to the County Counsel, using the required form issued by that office.	
17.	November 20, 2023 (transmitted by email November 21, 2023) / 5 pages	To: Christopher J. Bakes From Sara James	Letter. Responding to Bakes communications dated November 13 and 15, 2023, regarding records act compliance, attorneys fees, and Lucero conduct.	\$53229
18.	November 28, 2023 / 4 pages	To: Sara James and Jack Hughes From: Christopher J. Bakes	Letter. Responding to James letter dated November 20, 2023 (transmitted by email on November 21, 2023) re recusal, payment of attorneys fees, and governing ethics rules, reiterating nature of S. Roberts' email statement that D. Lucero instigated the litigation threat. [Separate letter addresses CPRA compliance by County.]	\$56918.5
19.	November 28, 2023 / 2 pages	To: Sara James and Jack Hughes From: Christopher J. Bakes	Letter. Letter addresses CPRA compliance by County.	\$56918.5
20.	December 4, 2023 / 2 pages	To: Michelle Cannon, attorney for College District From: Christopher J. Bakes	Email. Confirming lack of compliance. M. Cannon later advises that all compliant records will be sent within 14 days (suggesting by year-end).	\$56918.5
21.	December 5, 2023	To: Sara James From: Christopher J. Bakes	Email. Advising of lack of response to November 28, 2023 (four-page) letter re attorneys fees, and attaching November 28, 2023, letter.	\$57896
22.	December 7, 2023 / 2 pages	To: Sara James and Jack Hughes From: Christopher J. Bakes	Email. Addressing pending compliance by County and need to account for withheld documents.	\$58448.5
23.	December 8, 2023 / 2 pages	To: Christopher J. Bakes From: Sara James	Email. Continuing commitment to compliance with CPRA request served on Board.	\$58448.5
24.	December 12, 2023 Board Meeting			\$58873.5
25.	December 15, 2023 / multiple pages	To: Christopher J. Bakes From: Sara James	Emails, with attachments; partial compliance with CPRA request.	\$58873.5
26.	December 15, 2023 / 4 pages	To: Christopher J. Bakes From: Sara James	Letter, contesting CPRA compliance obligations in part.	\$58873.5

27.	December 29, 2023 / multiple pages	To: Sara James From: Christopher J. Bakes	Email, confirming failure to fully comply with CPRA request, and declining to limit requests.	\$60362
28.	January 2, 2024 / 131 pages	To: Board From: D. Lucero	Emailed as an attachment, consisting of 131 pages, appended to Board agenda. Accepted and made part of the agenda on approval of Board, over the objection of Supervisor Engels. Content includes statement that Salvage Memo not attached since "withdrawn," but then re-asserts the contentions contained in Salvage Memo.	\$65703.5
29.	January 2, 2024 Board Meeting Transcript available.			\$65703.5
30.	January 10, 2024	To: Christopher J. Bakes From: Sara James	Email, expanding cooperation with CPRA to include further numbered items.	\$67803.5
31.	January 23, 2024	To: J. Brechtel, S. James, and J. Hughes From: Christopher J. Bakes	Letter.	\$74388.5
32.	January 25, 2023	To: Christopher J. Bakes From J. Brechtel	Email.	\$74958.5
33.	February 5, 2024	To: Board via County Counsel From: Christopher J. Bakes.	Email plus letter. Attached please find urgent correspondence directed to J. Brechtel, S. James, and J. Hughes, supplementing my January 23, 2024, letter and responding to Mr. Brechtel's January 25, 2024, email below.	\$89182.5
34.	February 6, 2024 Board Meeting Transcript available.		Brechtel: "Again, at this point in the proceedings, if Ms. White would like to request attorney fees moving forward, <i>it definitely does appear that there is a conflict of interest that might be developing here</i> , and we could take it under consideration. The request that -- she did send a request at some point for attorney fees. We had already told you that we did not see a conflict of interest, and that was before she was entitled to fees under 3100.6. (21:18-25; 22:1-3)." (Emphasis added.)	\$93873
35.	February 20, 2024		D. Lucero makes demand for attorneys fees to address "hostile work environment," directed	

	Board Meeting Transcript available.		against DA D. Hollister. No evidence submitted. “Impartial investigator” to be retained.	
36.	February 20, 2024	To: Plumas County Public Records Request From: Christopher J. Bakes	Letter, seeking all records associated with D. Lucero’s emails re N. Selvage, J. White, and D. Hollister.	
37.	February 20, 2024	To: Board via County Counsel From: Christopher J. Bakes	Request for payment of fees incurred before December 1, 2023.	\$96943 Pending billing department data.
38.	February 20, 2024	To: Board via County Counsel From: Christopher J. Bakes	Request for payment of fees incurred after January 1, 2024, citing J. Brechtel comments at February 5, 2024, Board meeting	Pending billing department data.
39.	February 22, 2024	To: S. James, J. Brechtel From: Christopher J. Bakes	Email, continuing to summarize representational conflict, asks again for disqualification, identifies denial of alignment with D. Lucero as implausible.	
40.	February 27, 2024	To: County of Plumas From: D. Lucero	Email, public records request issued by D. Lucero, seeking all public records with date range of September 6, 2023 to February 27, 2024 DA David Hollister and Chris Bakes as it relates to Debra Lucero and/or Julie White DA David Hollister and Interim City Manager Jon Kennedy as it relates to Debra Lucero and/or Julie White Julie White and DA David Hollister as it relates to Debra Lucero and/or Feather River Tourism Association and/or Feather River College and/or Sharon Roberts Sheri Johns and Chris Bakes as it relates to Debra Lucero and/or Julie White	
41.	March 1, 2024	To: Multiple recipients From: A. Cox	Email, forwarding D. Lucero’s email to “impartial investigator.”	Pending billing department data.
42.	March 4, 2024	To: Board via County Counsel From: Christopher J. Bakes	Letter, detailing Lucero communication to C. Bouger, so-called impartial investigator, including attachments, and consequences of same, all while D. Lucero transmitting CPRA	Pending billing department data.

			requests using her official County email, all directed at information associated with J. White and DA D. Hollister.	
43.	March 4, 2024	To: DebraLucero@countyofplumas.com <debralucero@countyofplumas.com>; Hollister, David <DavidHollister@countyofplumas.com>; juliewhite@countyofplumas.com; Hagwood, Greg <greghagwood@countyofplumas.com>; christopher@boucher.law; citymanager@cityofportola.com; joshbrechtel@countyofplumas.com From: Christopher J. Bakes	Email, transmitting letter of same date to Board, objecting to advance taints of “impartial investigator” established by D. Lucero transmitting to the investigator her interpretation of evidence she does not have.	Pending billing department data.
44.	March 4, 2024	To: Board of Supervisors Subject: FW: Public Records Requests - 193: Shaw		
45.	March 4, 2024	To: Christopher J. Bakes From: Sara James	Email, professing not to understand purpose of C. Bakes letter of same date to Board.	Pending billing department data.
46.	March 4, 2024	To: Sara James From: Christopher J. Bakes	Email, reiterating positions in March 4, 2024, letter.	Pending billing department data.
47.	March 5, 2024 Board Meeting Transcript available.		Ms. White’s attorneys fees denied on vote taken prior to recusals of Supervisors Hagwood and McGowan. Hagwood and McGowan recusals follow. Vote on fees rescheduled on motion by Supervisor Goss. Fees for “impartial investigator” approved. Still no evidence submitted by D. Lucero. D. Hollister makes forceful argument regarding D. Lucero.	Pending billing department data.
48.	March 9, 2024	To: Board From: Shelley Hunter; Quincy Feather Bed Inn [member of Feather River Tourist Authority, previously identified as colluding with D. Lucero’s solicitation of “litigation threat”]	Email, with content summary as follows. [¶ 1: Condemning of J. White.] [¶ 2: States request for attorneys fees “feels like extortion,” condemning of counsel for J. White, again condemning of J. White, cites writer’s long-ago anger when forming Feather River Tourist District. Advocates for D. Lucero.]	Pending billing department data.

			<p>[¶ 3: Continues to castigate J. White.]</p> <p>[¶ 4: Continues to insult counsel for J. White. Flatters Board. Again castigates J. White. States opposition to payment of fees.]</p> <p>[¶ 5: Repeats opposition to payment of fees.]</p>	
49.	<p>March 12, 2024</p> <p>Board Meeting</p> <p>Transcript available.</p>		<p>At meeting, on the record, Supervisor McGowan, violating his own recusal, offers unprompted endorsement of Shelley Hunter email, honors it as complimentary. Public endorsement of such a letter also constitutes further evidence of representational conflict, bias, and failure by certain Board members to adhere to basic norms of governance (here, the effect of recusal).</p>	<p>Pending billing department data.</p>