

## Gard, Lacey

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**From:** Paul Lovelis <Paul.Lovelis@pima.gov>  
**Sent:** Thursday, January 03, 2019 8:51 PM  
**To:** Todd, John  
**Cc:** Gard, Lacey; Vidal, Daniel  
**Subject:** RE: Correction of the data sent to you  
**Attachments:** PRRN 2018-267 unduplicated.xlsx

Dear Mr. Todd,

I write this to you to inform you of a correction in the data we sent you on September 7<sup>th</sup>, of 2018. It was brought to our attention that there were duplicate EventID's in some of the raw data, and upon researching this we found that to be accurate. Three cases that were migrated over from an old database system had duplicated the involvement of the attorneys inside the case and thus created some duplicates of the expenses as well. I have attached a new version of the excel sheet which contains the raw data (unduplicated) as well as the summaries. In the summaries I highlighted the three cases (CR06824, CR39599, and CR51263) as well as showed the difference in previous reported and unduplicated reporting. These duplicates only existed in attorney expenses, we did double check the data for the litigation expenses (raw data was omitted due to confidentiality) and no duplicates were found. This brings total attorney expenditures down from \$4,145,632.54 to \$3,536,714.12, a difference of \$608,918.42. I am very sorry for this oversight, this data has been pulled often for previous queries, but not so far back as you had asked for and so I overlooked the duplication. Please accept my apology and this email as a correction to the previous data requested.

Sincerely,  
Paul Lovelis  
Systems and Operations Manager  
Pima County Public Defense Services  
(520) 724-6816

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**From:** Todd, John <John.Todd@azag.gov>  
**Sent:** Tuesday, September 11, 2018 5:14 PM  
**To:** Paul Lovelis <Paul.Lovelis@pima.gov>  
**Cc:** Gard, Lacey <Lacey.Gard@azag.gov>; Vidal, Daniel <Daniel.Vidal@azag.gov>  
**Subject:** RE: Another Question

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Thanks Paul. I'll confer with others and let you know. Am I correct, you would have no problem certifying the numbers?

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**From:** Paul Lovelis [<mailto:Paul.Lovelis@pima.gov>]  
**Sent:** Tuesday, September 11, 2018 5:11 PM  
**To:** Todd, John  
**Cc:** Gard, Lacey; Vidal, Daniel  
**Subject:** Re: Another Question

Hello Mr. Todd,

We believe that supporting documentation is not subject to disclosure under public records law because of the confidential obligations we have to our clients.

If you have more specific examples of what you are looking for and/or trying to get information about, we would be glad to consider it.

Sincerely  
Paul Lovelis  
Systems and Operations  
Pima County Public Defense Services  
724-6816

On Mon, Sep 10, 2018 at 3:17 PM -0700, "Paul Lovelis" <[Paul.Lovelis@pima.gov](mailto:Paul.Lovelis@pima.gov)> wrote:

John,  
Don't worry about putting me in the middle on this, its my job to be there. I have spoken with our Director Dean Brault, we will do some further discussions with our Attorney and get back to you as soon as possible. I will do my best to have a response to you within 7 business days, and if it looks like it will be longer than that, I will inform you as soon as I am aware of such a delay.

Sincerely  
Paul Lovelis

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**From:** Todd, John <[John.Todd@azag.gov](mailto:John.Todd@azag.gov)>  
**Sent:** Friday, September 7, 2018 3:58 PM  
**To:** Paul Lovelis <[Paul.Lovelis@pima.gov](mailto:Paul.Lovelis@pima.gov)>  
**Cc:** Gard, Lacey <[Lacey.Gard@azag.gov](mailto:Lacey.Gard@azag.gov)>; Vidal, Daniel <[Daniel.Vidal@azag.gov](mailto:Daniel.Vidal@azag.gov)>  
**Subject:** RE: Another Question

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That is surprising. Why are they not public records, in fact public financial records? Is there some special exception to the public records law? I don't mean to put you in the middle Paul.

It is not the case that you are unable to provide the pdf of the supporting documentation, but rather as a legal matter your office feels that those documents are confidential under the public records law. Am I understanding your office's position correctly?

It is ok to bump me up to the person who is giving the legal advice. Again Paul, I greatly appreciate all the help you have been and providing us with that non-confidential financial information so expeditiously and directing us to the appropriate people at Maricopa County.

John

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**From:** Paul Lovelis [<mailto:Paul.Lovelis@pima.gov>]  
**Sent:** Friday, September 07, 2018 3:49 PM  
**To:** Todd, John

**Cc:** Gard, Lacey; Vidal, Daniel  
**Subject:** RE: Another Question

No we cannot. We consider all invoices to be information that is confidential as a part of the representation of the case.

Paul

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**From:** Todd, John <[John.Todd@azag.gov](mailto:John.Todd@azag.gov)>  
**Sent:** Friday, September 7, 2018 3:44 PM  
**To:** Paul Lovelis <[Paul.Lovelis@pima.gov](mailto:Paul.Lovelis@pima.gov)>  
**Cc:** Gard, Lacey <[Lacey.Gard@azag.gov](mailto:Lacey.Gard@azag.gov)>; Vidal, Daniel <[Daniel.Vidal@azag.gov](mailto:Daniel.Vidal@azag.gov)>  
**Subject:** RE: Another Question

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Would you be able to provide us with the pdf of those documents?

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**From:** Paul Lovelis [<mailto:Paul.Lovelis@pima.gov>]  
**Sent:** Friday, September 07, 2018 3:42 PM  
**To:** Todd, John  
**Cc:** Gard, Lacey  
**Subject:** Re: Another Question

Yes we do

Sincerely  
Paul Lovelis  
Systems and Operations  
Pima County Public Defense Services  
724-6816

On Fri, Sep 7, 2018 at 3:30 PM -0700, "Todd, John" <[John.Todd@azag.gov](mailto:John.Todd@azag.gov)> wrote:

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Yes

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**From:** Paul Lovelis [<mailto:Paul.Lovelis@pima.gov>]  
**Sent:** Friday, September 07, 2018 3:30 PM  
**To:** Todd, John  
**Cc:** Gard, Lacey  
**Subject:** Re: Another Question

When you say supporting documentation, do you mean the original invoices?

Sincerely  
Paul Lovelis  
Systems and Operations  
Pima County Public Defense Services  
724-6816

On Fri, Sep 7, 2018 at 3:27 PM -0700, "Todd, John" <[John.Todd@azag.gov](mailto:John.Todd@azag.gov)> wrote:

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Paul,

Thanks again for providing the information concerning what Pima County spent for attorney representation in capital PCRs. Do you have the supporting documentation? If so, is it in pdf form?

John

John Pressley Todd  
Special Assistant Attorney General  
Solicitor General's Division/Capital Litigation Section  
2005 North Central Ave  
Phoenix, Arizona 85004  
602.542.8590