

SECOND JUDICIAL DISTRICT COURT
COUNT OF BERNALILLO
STATE OF NEW MEXICO

FILED
2nd JUDICIAL DISTRICT COURT
Bernalillo County
12/18/2018 10:56 AM
James A. Noel
CLERK OF THE COURT
Latoya Grayes

DANIEL LIBIT,

Plaintiff,

v.

No. D-202-CV-2018-09182

BOARD OF REGENTS OF THE
UNIVERSITY OF NEW MEXICO and
CHRISTINE LANDAVAZO, in her
capacity as Interim Custodian of Records for
the University of New Mexico,

Defendants.

**COMPLAINT UNDER THE NEW MEXICO INSPECTION OF
PUBLIC RECORDS ACT**

Plaintiff Daniel Libit, by and through his attorney, Law Offices of Nicholas T. Hart, LLC (Nicholas T. Hart), and for his complaint under the New Mexico Inspection of Public Record Act states:

PARTIES

1. Plaintiff Daniel Libit is a journalist who, among other journalistic activities, operates NMFishbowl.com, a website “that primarily covers the University of New Mexico, its athletics department – and the key figures who maintain it, support it, and are enriched by it.” *See* <https://nmfishbowl.com/about/> (last accessed December 13, 2018). Libit is a resident of Cook County, Illinois, but was born and raised in New Mexico. Libit commonly requests documents under IPRA in the course of his reporting, including for NMFishbowl.com.

2. Defendant Board of Regents of the University of New Mexico is a corporate, governmental body and political subdivision of the State of New Mexico, established pursuant to

3. Defendant Christine Landavazo is the Interim Custodian of Public Records at the University of New Mexico. In this role, Landavazo is responsible for reviewing, granting, or denying public records requests submitted to the University. She is being sued in her official capacity. Her business address resides within the University of New Mexico's main campus in Albuquerque, New Mexico.

JURISDICTION AND VENUE

4. This action is brought according to this Court's original jurisdiction enumerated under Article IV, Section 13 of the New Mexico Constitution, and NMSA 1978 § 14-2-12, which authorizes actions to enforce IPRA.

5. Venue is proper in the County of Bernalillo because the defendants are governmental entities and an individual with their principal place of business in Albuquerque, New Mexico. NMSA 1978 § 38-3-1(A). Venue is further proper in the County of Bernalillo because the transaction at dispute in this complaint, namely the University's rejection of multiple IPRA requests, occurred in Albuquerque, New Mexico. *Id.*

FACTUAL BACKGROUND

6. On November 15, 2018, Plaintiff submitted IPRA Request No. 18-678, through which he requested "all communications by any staffers in the Office of University Counsel to/from Paul Krebs or Gene Gallegos since August 1, 2018." *See* Ex. A.

7. Paul Krebs is the former Athletic Director for the University of New Mexico.

8. Gene Gallegos is Mr. Krebs' attorney.

9. Paul Krebs is currently under criminal investigation by the Office of Attorney General in relationship to his activities while employed by the University of New Mexico.

10. On November 19, 2018, the Interim Records Custodian for the University of New Mexico, through Christy Armijo, who serves as an IPRA Paralegal to the Custodian of Public Records, responded that Plaintiff's request failed to comply with NMSA 1978, § 14-2-8(C) because it did not "identify the records sought with reasonable particularity." *Id.*

11. On November 30, 2018, Defendants denied Plaintiff's IPRA request, again asserting that Plaintiff's request failed to "identify the records sought with reasonable particularity." Ex. B

12. Specifically, Defendants contended in the denial letter that because the e-mails requested by Plaintiff included communications related to "the affairs of government and the official acts of public officers and employees," as well as allegedly non-public business, they were unable to determine which records Plaintiff sought because he did not identify the subject matter of the e-mails that he wished to inspect. *Id.*

13. Staffers of the University Counsel's office are public employees; therefore, their communications sent through University e-mail accounts are public records subject to disclosure under IPRA absent a valid exemption from disclosure under IPRA.

14. Until recently, Defendants regularly produced documents responsive to such requests. *See* Ex. G (producing documents responsive to a request for "all written communications, including emails, letters or text messages, between employees of UNM's office of legal counsel and Gene Gallegos, since Nov. 1, 2017").

15. On November 15, 2018, Plaintiff submitted IPRA Request No. 18-770, seeking "any electronic or hard copy communications transmitted by Marjori Krebs to any staffers at the UNM Foundation since Jan. 1, 2017." *See* Ex. C.

16. Marjori Krebs is, and at all time relevant to this case was, an employee of the University of New Mexico.

17. E-mails sent using her University account are public records subject to inspection absent a valid exemption from disclosure under IPRA.

18. On November 19, 2018, Defendants acknowledged receipt of the request but stated that the University had determined that the request “fails to describe with ‘reasonable particularity’ the records you are seeking.” *Id.*

19. On November 30, 2018, Defendants denied the request, stating that they had “determined that you have failed to comply with IPRA . . . which requires that ‘a written request . . . shall identify the records sought with reasonable particularity.’” *See Ex. D.*

20. The justification for this position was that Defendants were unable to ascertain the content that Plaintiff wished to discover in those e-mails and were therefore unable to determine whether the records were related to public business or private affairs. *Id.*

21. On November 16, 2018, Plaintiff submitted IPRA Request No. 18-772, through which he sought to inspect “all text messages between Chris Gallegos [sic] and Marron Lee since March 1, 2018.” *See Ex. E.*

22. On November 19, 2018, Defendants responded that the request “fails to describe with ‘reasonable particularity’ the records you are seeking,” and asked Plaintiff to clarify or amend his request. *Id.*

23. On November 20, 2018, Plaintiff responded to the acknowledgement letter, asking to “[p]lease amend this request to seek all text messages between Marron Lee and UNM VP Chris Vallejos. I seek all communications that relate to UNM business.” *See Ex. F.*

24. On November 21, 2018, Defendants amended the request, reclassified it as IPRA Request No. 18-777, and informed Plaintiff that the request still lacked “specificity as to the UNM related business for which you seek records.” *Id.*

25. Plaintiff responded by stating:

I am seeking text messages, between these two parties, for all UNM-related business since March 1.

I shouldn't be prohibited from receiving this breadth of material. Are you implying that the responsive text messages would be too voluminous to provide? That doesn't seem reasonable.

In any case, I view your demand to winnow a perfectly legitimate records request as unduly obstructive of IPRA. Please let me know if the University intends to press this point, or if it will provide the requested documents.

Id.

26. On December 3, 2018, Defendants responded by denying Plaintiff's request because they “determined that [Plaintiff] failed to comply with IPRA . . . which requires that a ‘written request . . . shall identify the records sought with reasonable particularity.’” *Id.*

27. Marron Lee is Vice President of the Board of Regents of the University of New Mexico.

28. Communications she makes, whether via text message or otherwise, that are related to UNM business are public records subject to disclosure under IPRA.

29. Chris Vallejos is the Associate Vice President for Institutional Support Services at the University of New Mexico.

30. Communications he makes, whether via text message or otherwise, that are related to UNM business are public records subject to disclosure under IPRA.

31. Defendants' formalistic approach to IPRA is invalid and contrary to controlling law.

32. The denial of Plaintiff's IPRA requests violated IPRA.

33. In *American Civil Liberties Union of New Mexico v. Duran*, 2016-NMCA-063, the New Mexico Court of Appeals stated that an IPRA request must be stated with reasonable particularity so that the public agency may identify the records sought by the request.

34. In this case, Plaintiff has requested categories of communications which are easily identifiable.

35. It is easily discernible from the IPRA Requests the records requested by Plaintiff.

36. Defendants did not assert that records requested by Plaintiff were exempt from disclosure by an enumerated exemption to IPRA.

CLAIM FOR RELIEF

Count I

Violation of the New Mexico Inspection of Public Records Acts by all Defendants

37. Plaintiff incorporates by reference the facts alleged in paragraphs 1 through 36.

38. Defendants have violated IPRA by failing to produce the public records requested by Plaintiff through IPRA Requests No. 18-768, 18-770, and 18-772/18-777, as required by IPRA.

39. Defendants unlawfully denied these requests despite being in the possession of responsive records.

40. Defendants' assertion that Plaintiff's requests did not "identify the records sought with reasonable particularity" violates IPRA.

41. Defendants are attempting to keep secret matters of significant public concern in direct violation of its obligation to disclose such information under IPRA.

42. Plaintiff is entitled to actual damages according to NMSA 1978 § 14-2-11(C) for Defendants' failure to provide the requested records.

43. Plaintiff is entitled to receive statutory penalties of \$100 per day, per request, according to NMSA 1978 § 14-2-11(C).

44. Plaintiff is entitled to a writ of mandamus or injunction, under NMSA 1978 § 14-2-12(B), ordering the Defendants to produce all requested records responsive to his request.

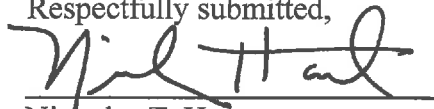
45. Plaintiff is entitled to recover his attorneys' fees and costs according to NMSA 1978 § 14-2-12(D).

PRAYER FOR RELIEF

The Plaintiff requests that the Court:

- a) Determine that Defendants have improperly denied Plaintiff's IPRA requests;
- b) Issue a writ of mandamus or injunction ordering the Defendants to produce the records and documents requested by Plaintiff without redactions and without further delay;
- c) Award statutory penalties equal to \$100 per day, per IPRA request, since the filing of the IPRA requests according to NMSA 1978 § 14-2-11(C).
- d) Award "damages, costs, and reasonable attorneys' fees" as required by NMSA 1978 § 14-2-12(D); and
- e) Award such further relief the Court deems necessary.

Respectfully submitted,



Nicholas T. Hart

LAW OFFICES OF NICHOLAS T. HART, LLC

515 Granite Avenue NW

Albuquerque, NM 87102

T: (505) 373-0924

F: (505) 341-9340

Nick@NicholasTHartLaw.com

November 19, 2018

Via Email Transmission: [REDACTED]

Daniel Libit
[REDACTED]

Re: IPRA Request No. 18-768

Dear Mr. Libit:

This letter is to acknowledge that The University of New Mexico Office of The Custodian of Public Records is in receipt of your Inspection of Public Records Act (IPRA) request dated November 15, 2018 for the following:

Pursuant to IPRA, I request all communications by any staffers in the Office of University Counsel to/from Paul Krebs or Gene Gallegos since August 1, 2018.

After a review of your request, we have determined that you have failed to comply with IPRA, NMSA 1978, Section 14-2-8(C), which requires that “a written request shall provide the name, address and telephone number of the person seeking access to the records and shall identify the records sought with reasonable particularity.”

Your request fails to describe with “reasonable particularity” the records you are seeking. Simply asking for all emails between employees of a UNM department and a former UNM employee and a private citizen, without identifying a specific subject matter or possible individuals involved in such emails on the part of UNM, or identifying the public business possibly being addressed therein, does not assist UNM in identifying the affairs of government and the official acts of the public officers and employee you are seeking and which IPRA was designed to promote. *See American Civil Liberties Union of New Mexico v. Duran*, 2016-NMCA-063, ¶ 26. “To initiate a public records request, any person may contact the records custodian at the desired governmental entity and ‘identify the records sought with reasonable particularity.’” *Id.* Unless you describe your request with “reasonable particularity,” the University is unable to determine whether it has responsive records to your request. “To determine whether a public record is ‘responsive,’ courts must evaluate whether the IPRA request identified the record “with reasonable particularity.” *Id.* at ¶ 27.

IPRA is intended to provide all persons with “the greatest possible information regarding the *affairs of government and the official acts of public officers and employees.*” IPRA, NMSA 1978, § 14-2-5 (emphasis added). Your request lacks specificity as to the affairs of government or the official acts of



public employees you are seeking. Moreover, your request is excessively broad in its request for all communications between an entire department within the University and a former UNM employee and a private citizen.

Please clarify your request pursuant to IPRA. If we do not hear from you within three days, we will close your request.

Please be advised that the Custodian sets the copying fee for any inspection in accordance with IPRA Section 14-2-9(C). The UNM fee schedule can be located at <http://publicrecords.unm.edu/>.

Sincerely,

Christy Armijo

Christy Armijo
IPRA Paralegal
Office of the Custodian of Public Records

November 30, 2018

Via Email Transmission: [REDACTED]

Daniel Libit
[REDACTED]

Re: IPRA Request No. 18-768

Dear Mr. Libit:

I am writing in response to your request dated November 15, 2018, pursuant to the New Mexico Inspection of Public Records Act (IPRA), wherein you initially requested the following:

Pursuant to IPRA, I request all communications by any staffers in the Office of University Counsel to/from Paul Krebs or Gene Gallegos since August 1, 2018.

On November 19, 2018, our office informed you that you had failed to comply with IPRA, NMSA 1978, Section 14-2-8(C) and asked for you to please clarify your request pursuant to IPRA. We informed you that if we did not hear from you within three days, we would close your request. As of today, we have not received any further clarification from you.

As a result, we are respectfully denying your request as we have determined that you have failed to comply with IPRA, NMSA 1978, Section 14-2-8(C), which requires that “a written request . . . shall identify the records sought with reasonable particularity.”

Your request fails to describe with “reasonable particularity” the records you are seeking. Simply asking for “all communications” between unidentified employees of a UNM department and a former UNM employee and/or a private citizen lacks the specificity necessary to identify the records you are seeking. Moreover, without identifying the specific subject matter (i.e., the public business possibly being addressed in such communications), UNM cannot identify the affairs of government and the official acts of the public officers and employees for which you are seeking records and which IPRA was designed to promote. *See American Civil Liberties Union of New Mexico v. Duran*, 2016-NMCA-063, ¶ 26. “To initiate a public records request, any person may contact the records custodian at the desired governmental entity and ‘identify the records sought with reasonable particularity.’” *Id.* Unless you describe your request with “reasonable particularity,” the University is unable to determine whether it has responsive records to your request. “To determine whether a public record is ‘responsive,’ courts must evaluate whether the IPRA request identified the record “with reasonable particularity.” *Id.* at ¶ 27.



More specifically, according to the New Mexico Attorney General (NMAG), “Requests must be stated with reasonable particularity. [IPRA] Section 14-2-8(C). ‘Reasonable particularity’ does not mean that the requester must identify the exact record needed, but *must* provide a description sufficient to enable the records custodian to identify and find the record requested.” *See* NMAG letter to Stephen T. Pacheco, First Judicial District Court of Santa Fe, October 23, 2018, p.2 (emphasis added).

IPRA is intended to provide all persons with “the greatest possible information regarding the *affairs of government* and the *official acts of public officers and employees.*” IPRA, NMSA 1978, § 14-2-5 (emphasis added). Your request lacks specificity as to the affairs of government or the official acts of public employees you are seeking.

For the foregoing reason, this request is respectfully denied and will be closed.

Sincerely,

Christy Armijo

Christy Armijo
IPRA Paralegal
Office of the Custodian of Public Records

November 19, 2018

Via Email Transmission: [REDACTED]

Daniel Libit
[REDACTED]

Re: IPRA Request No. 18-770

Dear Mr. Libit:

This letter is to acknowledge that The University of New Mexico Office of The Custodian of Public Records is in receipt of your Inspection of Public Records Act (IPRA) request dated November 15, 2018 for the following:

Pursuant to IPRA, I request any electronic or hard copy communications transmitted by Marjori Krebs to any staffers at the UNM Foundation since Jan. 1, 2017.

After a review of your request, we have determined that you have failed to comply with IPRA, NMSA 1978, Section 14-2-8(C), which requires that “a written request shall provide the name, address and telephone number of the person seeking access to the records and shall identify the records sought with reasonable particularity.”

Your request fails to describe with “reasonable particularity” the records you are seeking. Simply asking for any electronic or hard copy communications without identifying a specific subject matter or naming individuals from the UNM Foundation that may have been involved in such communications, or identifying the public business possibly being addressed therein, does not assist UNM in identifying the affairs of government and the official acts of the public officers and employee you are seeking and which IPRA was designed to promote. *See American Civil Liberties Union of New Mexico v. Duran*, 2016-NMCA-063, ¶ 26. “To initiate a public records request, any person may contact the records custodian at the desired governmental entity and ‘identify the records sought with reasonable particularity.’” *Id.* Unless you describe your request with “reasonable particularity,” the University is unable to determine whether it has responsive records to your request. “To determine whether a public record is ‘responsive,’ courts must evaluate whether the IPRA request identified the record “with reasonable particularity.” *Id.* at ¶ 27.

IPRA is intended to provide all persons with “the greatest possible information regarding the *affairs of government and the official acts of public officers and employees.*” IPRA, NMSA 1978, § 14-2-5 (emphasis added). Your request lacks specificity as to the affairs of government or the official acts of



public employees you are seeking. Moreover, your request is excessively broad in its request for all communications between a faculty member and an entire entity affiliated with the University.

Please clarify your request pursuant to IPRA. If we do not hear from you within three days, we will close your request.

Please be advised that the Custodian sets the copying fee for any inspection in accordance with IPRA Section 14-2-9(C). The UNM fee schedule can be located at <http://publicrecords.unm.edu/>.

Sincerely,

Christy Armijo

Christy Armijo
IPRA Paralegal
Office of the Custodian of Public Records

November 30, 2018

Via Email Transmission: [REDACTED]

Daniel Libit
[REDACTED]

Re: IPRA Request No. 18-770

Dear Mr. Libit:

I am writing in response to your request dated November 15, 2018, pursuant to the New Mexico Inspection of Public Records Act (IPRA), wherein you requested the following:

Pursuant to IPRA, I request any electronic or hard copy communications transmitted by Marjori Krebs to any staffers at the UNM Foundation since Jan. 1, 2017.

On November 19, 2018, our office informed you that you had failed to comply with IPRA, NMSA 1978, Section 14-2-8(C) and asked for you to please clarify your request pursuant to IPRA. We informed you that if we did not hear from you within three days, we would close your request. As of today, we have not received any further clarification from you.

Therefore, we are respectfully denying your request as we have determined that you have failed to comply with IPRA, NMSA 1978, Section 14-2-8 (C), which requires that “a written request . . . shall identify the records sought with reasonable particularity.”

Your request fails to describe with “reasonable particularity” the records you are seeking. Simply asking for “any electronic or hard copy communications” sent by a UNM employee over a period of nearly 23 months, without identifying a specific subject matter (i.e., the public business possibly being addressed therein), and the specific recipient of such communications, does not allow UNM to identify the affairs of government and the official acts of the public officers and employees for which you are seeking records and which IPRA was designed to promote. *See American Civil Liberties Union of New Mexico v. Duran*, 2016-NMCA-063, ¶ 26. “To initiate a public records request, any person may contact the records custodian at the desired governmental entity and ‘identify the records sought with reasonable particularity.’” *Id.* Unless you describe your request with “reasonable particularity,” the University is unable to determine whether it has responsive records to your request. “To determine whether a public record is ‘responsive,’ courts must evaluate whether the IPRA request identified the record “with reasonable particularity.” *Id.* at ¶ 27.



More specifically, according to the New Mexico Attorney General (NMAG), “Requests must be stated with reasonable particularity. [IPRA] Section 14-2-8(C). ‘Reasonable particularity’ does not mean that the requester must identify the exact record needed, but *must* provide a description sufficient to enable the records custodian to identify and find the record requested.” *See* NMAG letter to Stephen T. Pacheco, First Judicial District Court of Santa Fe, October 23, 2018, p.2 (emphasis added).

IPRA is intended to provide all persons with “the greatest possible information regarding the *affairs of government* and the *official acts of public officers and employees.*” IPRA, NMSA 1978, § 14-2-5 (emphasis added). Your request lacks specificity as to the affairs of government or the official acts of public employees you are seeking.

For the foregoing reason, this request is respectfully denied and will be closed.

Sincerely,

Christy Armijo

Christy Armijo
IPRA Paralegal
Office of the Custodian of Public Records

November 19, 2018

Via Email Transmission: [REDACTED]

Daniel Libit
[REDACTED]

Re: IPRA Request No. 18-772

Dear Mr. Libit:

This letter is to acknowledge that The University of New Mexico Office of The Custodian of Public Records is in receipt of your Inspection of Public Records Act (IPRA) request dated November 16, 2018 for the following:

Pursuant to IPRA, I request all text messages between Chris Gallegos and Marron Lee since March 1, 2018.

After a review of your request, we have determined that you have failed to comply with IPRA, NMSA 1978, Section 14-2-8(C), which requires that “a written request shall provide the name, address and telephone number of the person seeking access to the records and shall identify the records sought with reasonable particularity.”

Your request fails to describe with “reasonable particularity” the records you are seeking. Simply asking for all text messages between employees without identifying a specific subject matter or identifying the public business possibly being addressed therein, does not assist UNM in identifying the affairs of government and the official acts of the public officers and employee you are seeking and which IPRA was designed to promote. *See American Civil Liberties Union of New Mexico v. Duran*, 2016-NMCA-063, ¶ 26. “To initiate a public records request, any person may contact the records custodian at the desired governmental entity and ‘identify the records sought with reasonable particularity.’” *Id.* Unless you describe your request with “reasonable particularity,” the University is unable to determine whether it has responsive records to your request. “To determine whether a public record is ‘responsive,’ courts must evaluate whether the IPRA request identified the record “with reasonable particularity.” *Id.* at ¶ 27.

IPRA is intended to provide all persons with “the greatest possible information regarding the *affairs of government* and the *official acts of public officers and employees.*” IPRA, NMSA 1978, § 14-2-5 (emphasis added). Your request lacks specificity as to the affairs of government or the official acts of public employees you are seeking.



Moreover, while we are familiar with Marron Lee as a Regent on the UNM Board of Regents, your request fails to identify with particularity the Chris Gallegos set forth in your request as an administrator, faculty or staff member.

Please clarify your request pursuant to standards set forth in IPRA. If we do not hear from you within three days, we will close your request.

Please be advised that the Custodian sets the copying fee for any inspection in accordance with IPRA Section 14-2-9(C). The UNM fee schedule can be located at <http://publicrecords.unm.edu/>.

Sincerely,

Christy Armijo

Christy Armijo
IPRA Paralegal
Office of the Custodian of Public Records

December 3, 2018

Via Email Transmission: [REDACTED]

Daniel Libit
[REDACTED]

Re: IPRA Request No. 18-777

Dear Mr. Libit:

I am writing in response to your request dated November 16, 2018, pursuant to the New Mexico Inspection of Public Records Act (IPRA), wherein you initially requested the following:

Pursuant to IPRA, I request all text messages between Chris Gallegos and Marron Lee since March 1, 2018.

On November 19, 2018 our office informed you that you had failed to comply with IPRA, NMSA 1978, Section 14-2-8(C), because your request failed to describe with "reasonable particularity" the records you are seeking. On November 20, 2018 you amended your request as follows:

Please amend this request to seek all text messages between Marron Lee and UNM VP Chris Vallejos. I seek all communications that relate to UNM business.

On November 21, 2018 after our office informed you that your request continued to lack specificity as to the UNM related business for which you were seeking records. You responded by saying:

I am seeking text messages, between these two parties, for all UNM-related business since March 1.

I shouldn't be prohibited from receiving this breadth of materials. Are you implying that the responsive text messages would be too voluminous to provide? That doesn't seem reasonable.

In any case, I view your demand to winnow a perfectly legitimate records request as unduly obstructive of IPRA. Please let me know if the university intends to press this point, or if it will provide the requested documents.

Please be advised that we are respectfully denying your request as we have determined that you have failed to comply with IPRA, NMSA 1978, Section 14-2-8(C), which requires that "a written request . . . shall identify the records sought with reasonable particularity."



Your request fails to describe with “reasonable particularity” the records you are seeking. Simply asking for all text messages between a UNM employee and a UNM regent, without identifying a specific subject matter or identifying the public business possibly being addressed therein, does not allow UNM to identify the affairs of government and the official acts of the public officers and employees for which you are seeking records, and what IPRA was designed to promote. *See American Civil Liberties Union of New Mexico v. Duran*, 2016-NMCA-063, ¶ 26. “To initiate a public records request, any person may contact the records custodian at the desired governmental entity and ‘identify the records sought with reasonable particularity.’” *Id.* Unless you describe your request with “reasonable particularity,” the University is unable to determine whether it has responsive records to your request. “To determine whether a public record is ‘responsive,’ courts must evaluate whether the IPRA request identified the record “with reasonable particularity.” *Id.* at ¶ 27.

More specifically, according to the New Mexico Attorney General (NMAG), “Requests must be stated with reasonable particularity. [IPRA] Section 14-2-8(C). ‘Reasonable particularity’ does not mean that the requester must identify the exact record needed, but *must* provide a description sufficient to enable the records custodian to identify and find the record requested.” *See* Letter from NMAG to Stephen T. Pacheco, First Judicial District Court of Santa Fe, October 23, 2018, p.2 (emphasis added).

IPRA is intended to provide all persons with “the greatest possible information regarding the *affairs of government* and the *official acts of public officers and employees.*” IPRA, NMSA 1978, § 14-2-5 (emphasis added). Your request lacks specificity as to the affairs of government or the official acts of public officers or employees that you are seeking.

For the foregoing reason, this request is respectfully denied and will be closed.

Sincerely,

Christine M. Landavazo

Christine M. Landavazo
Interim Custodian of Public Records
Office of the Custodian of Public Records



The University of New Mexico

Office of The Custodian of Public Records

MSC05 3440
Scholes Hall Room 208
1 University of New Mexico
Albuquerque, NM 87131-0001
Telephone (505) 277-5035
<http://publicrecords.unm.edu/>
unmipra@unm.edu

December 21, 2017

Via Email Transmission: [REDACTED]

Daniel Libit
[REDACTED]

Re: **IPRA Request No. 17-611**

Dear Mr. Libit:

Per your IPRA request dated December 4, 2017 for the following:

Per IPRA, I request all written communications, including emails, letters or text messages, between employees of UNM's office of legal counsel and Gene Gallegos, since Nov. 1, 2017.

Attached please find the public records searched for and are responsive to your request. Information not subject to public disclosure under IPRA and/or protected personal identifier information contained in the requested records has been redacted under Section 14-2-1(B) of the Inspection of Public Records Act.

There will be no charge for the production of this request as it is under 20 pages. This request is considered fulfilled, should you require further information please submit a new IPRA request to this office at <https://unmipra.nextrequest.com/>.

Sincerely,

John Rodriguez

John Rodriguez, M.A.
Custodian of Public Records

Attachment

