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Tiffany Anderson
1900 Lakeshore Dr.
Lodi, CA 95242

Dear Ms. Anderson:

This letter is a further response to your letter of March 16, 2016.

In that letter you asked for records pursuant to Labor Code section 226. That section requires that an employer provide an accurate statement showing pay information including gross wages earned, total hours worked by the employee, deductions and net pay. As my letter of March 23 stated, the District already has provided that information with each pay check you received during your employment with the District. Thus, the District will not be providing documents pursuant to the Labor Section 226 request.

In your letter, you refer to a secret file. To be clear, this is no secret file on you or any employee. There are files that may refer to you but which are protected by the privacy rights of other employees. The District has an obligation to protect those privacy rights which may contain allegations against those employees whether those allegations are completely baseless or are well founded. Thus you will not be receiving access to those privileged files.

Your March 16th letter had a list of 17 different categories of requests. None of them fell within the purview of either Labor Code section 226 or section 6408. However, as your letter could be viewed as a requests under Labor Code section § 1198.5, the District will comply to the extent those documents are within the control of the District, are not confidential or otherwise privileged, and to the extent that the documents have not already been provided to you.

The District's response to your categorical requests are as follows:

1. All material related to my Skelly charges and attempted firing in September 2011:

- a. The District has material and The District will provide it to the extent that the information does not impinge on the privacy rights of another employee. You did receive all of this at the Skelly hearings.
2. My Whistleblower Hotline Investigation (performed by Eley) in 2008:
 - a. This matter involved a charge against John Stroh. The investigation is confidential as it impinges on the privacy rights of Mr. Stroh. You did receive a letter regarding the results. A copy of the letter will be available for you at the District office.
3. My ERMA Sexual Harassment complaint against supervisor Bob Durham:
 - a. This matter involved a charge against Bob Durham. The investigation is confidential as it impinges on the privacy rights of Mr. Durham.
4. My AIMS interview, investigation, and recorded testimony that was gathered for the District to use against Don Meidinger in his heart attack claim:
 - a. The information requested does not fall with the requirements of Labor Code section § 1198.5. Moreover, the District does not have any such material. The worker's compensation administrator may have information. However, as this involved the claim of another employee, it is not available to you.
5. Copies of the District memos where I was directed to be driven to the Stockwell Harris firm to be interviewed by Eric Helphrey in the Meidinger claim.
 - a. The information requested does not fall with the requirements of Labor Code section § 1198.5. Moreover, the District does not have requested documents.
6. My auto accident claim from 2011 where I was rear-ended in a company truck while on the clock in Tracy.
 - a. The District is not aware of your involvement in an accident in the calendar year 2011.
7. All of the disciplinary notes against me.
 - a. The District will provide information involving proposed discipline. Beyond that the request is vague.
8. All of my requests for vacation/sick leave
 - a. The District has already provided documents.

9. All of my payroll information.
 - a. The District has already provided documents.
10. All injury reports related to me.
 - a. District has already provided documents.
11. All EEO-1 survey and intake forms.
 - a. The information requested does not fall with the requirements of Labor Code section § 1198.5.
12. All faxes received by the District from my treating doctors.
 - a. District has already provided documents.
13. All complaints that I made whether written by me or reduced to writing by the District from my verbal reporting.
 - a. The District will provide any non-privileged material made in response to complaints made by you during your actual employment with the District.
14. All documentation regarding me that has been given to the board.
 - a. You have sent numerous correspondence to the District and the Board since you left District employment. None of that falls within Labor Code section 1198.5. The District needs more clarification on this request. Are you asking for documents created by you given to the board or any document or correspondence created by an entity other than yourself that we can provide?
15. Any and all surveillance reports regarding me initiated, instigated or funded by the District.
 - a. The District did not initiate, instigate or fund any surveillance.
16. Any other document that has my signature.
 - a. The information requested does not fall with the requirements of Labor Code section § 1198.5.
17. I also request all of my exposure records (going back to 30 years) under the federal rule 29 CFR 1910.1020. I was exposed to formaldehyde by the District as early as 2004 and as late as 2011.

- a. You have made the allegation of formaldehyde exposure on several occasions. The District has no records of Formaldehyde exposure. In fact, the records of the District indicate that you had no exposure or contact with formaldehyde.

This concludes the District's response to your March 16, 2016. You may contact the District directly to determine a time to review the documents.



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Cc: Client