

From: Christi Grab [REDACTED]
Subject: Offering you the opportunity to provide a legal code to defend yourself...
Date: September 5, 2023 at 1:01 PM
To: [REDACTED]



...On August 18, 2023, Erika Contreras violated my rights under the Legislative Open Records Act, Gov code 9070 *et seq.*, by responding with improperly redacted documents (exhibit 3). The documents provided hid the signatures of the person swearing the oath and the witness. The way to tell if an oath is properly executed is to see if it is properly signed by the person swearing that oath, properly signed by the person witnessing the oath being administered, and that the document is properly dated. By hiding the signatures, it is impossible to determine whether the oaths were properly executed.

On August 31, 2021, I sent an email demanding unredacted documents. I gave a deadline to respond of 09:00 am on Tuesday, September 5, 2023 (exhibit 4). On September 5, 2023 at 10:36 am, I called Ms. Contreras to ask if she intended to send over unredacted documents. I left a message for her.

At 10:40 am, John Nam returned my call on Ms. Contreras's behalf. Mr. Nam stated that the LORA request had already been fulfilled. I stated at least a half-dozen times that the documents had been unlawfully redacted and asked him at least a half-dozen times if he would send unredacted documents. Mr. Nam never denied the allegation that the documents were improperly redacted; he simply repeated over and over again that the LORA request had been already been fulfilled. Per CCP § 431.20(a), failure to deny constitutes admission: Any material allegation in the complaint that is not effectively denied is deemed admitted. [*see Hennefer v. Butcher (1986) 182 CA3d 492, 504, 227 CR 318, 325*]. By failing to deny the allegations that the documents were unlawfully redacted, he has tacitly admitted that he was aware that Ms. Contreras had violated the law. This makes him a co-conspirator in violating my rights under the Legislative Open Records Act, Gov code 9070 *et seq.*