



Jordanelle Special Service District

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May 14, 2015

Tracy Taylor
451 N 1300 E
Heber City, Utah 84032
Email: tracy@etracytaylor.com

Dear Ms. Taylor:

We have been asked to respond to your GRAMA Request, dated April 27, 2015 (the "Request"). The Request asks Jordanelle Special Service District to provide "Any and all information concerning Dan Matthews: [a] contracts or agreements concerning a retirement, separation or severance package, including any agreements or contracts for future employment, consulting or for any other county entity, department, or district. [b] All Email communications between said individual and individual members of County Council from the period of one year prior to the separation." In response to the Request, please find enclosed and attached the following documents:

1. Severance Agreement by and between Jordanelle Special Service District and Dan Matthews, dated December 16, 2015;
2. Consulting and Confidentiality Agreement by and between Jordanelle Special Service District and Dan Matthews, dated January 2, 2015.

These documents are responsive to Request [a] above.

Although we have not finished searching JSSD's records for "all Email communications" between Mr. Matthews and members of the Wasatch County Council, JSSD hereby notifies you that it objects to Request [b] above to the extent such documents are protected by the attorney-client privilege and/or work product doctrine. As you know, JSSD is currently embroiled in litigation with certain property owners located within the Jordanelle Special Improvement District 2005-2 ("Area C") as well as the bondholders who funded the construction of Improvements for the benefit of these same property owners. The majority, if not all, of Mr. Matthews communications with members of the Wasatch County Council were verbal. To the extent we are able to locate any email communications with members of the Wasatch County Council over the year preceding December 16, 2014 that are not protected records under Utah Code Ann. § 63G-2-305(17) and (18), they will be produced.

Pursuant to Utah Code Ann. §63G-2-401, you have the right to appeal JSSD's response to the Request the chief administrative officer, Michael Kohler, Chairman of JSSD's governing board. Your notice of appeal must be submitted within 30 days of the above denial date and must include your name, mailing address, daytime telephone number, and an explanation of the relief sought. [Note: The denial only applies to those records the District claims to be protected records under Utah Code Ann. § 63G-2-305(17) and (18). It will be producing communications that are not otherwise protected once the review for privilege is completed.]. You may also include any supporting information with your notice of appeal. Your appeal may be submitted to Mr. Kohler at the following address: 6135 E Lake Creek Road P.O. Box 519 Heber City, Utah 84032.

Thank you for your time and consideration.

Very truly yours,

Jordanelle Special Service District

Darrel Scow

Darrel Scow, Assistant General Manager *ekm*

Enclosures

cc: Michael Kohler
Mark R. Gaylord