

0178-12

### PUBLIC RECORDS REQUEST

This form must be filled out before any Public Records Request is accepted by the Parish of Jefferson. Requestor must show valid identification and document age. (Must be 18 years of age) La.R.S. 44:32(A)

Submit to: PARISH OF JEFFERSON  
East Bank Parish Attorney's Office  
1221 Elmwood Park Boulevard, Suite 701 Jefferson, La. 70123

Email: [publicrecordsrequest@jeffparish.net](mailto:publicrecordsrequest@jeffparish.net)

Fax #: (504) 736-6307

**\*YOU MUST ATTACH A COPY OF AN OFFICIAL PICTURE ID SHOWING DATE OF BIRTH\***

DATE: 4/13/2012 TIME: 3:00 p.m.

NAME & ADDRESS OF PERSON MAKING THE REQUEST (PRINT):

Robert C. Jenkins  
631 St. Charles Ave. New Orleans, LA 70130

PHONE#: (504) 586-1616 Fax#: (504) 569-0037

EMAIL ADDRESS (PRINT): rj1430@aol.com

ADDRESS/LOCATION OF ANY PROPERTY INFORMATION REQUESTS: (One address per form) (PRINT):

INFORMATION REQUESTED (Please be specific) (PRINT):

See Attached

PERIOD OF TIME THIS INFORMATION WOULD LIKELY EXIST:

See Attached

DO NOT WRITE BELOW THIS LINE: FOR OFFICIAL USE ONLY

.....  
**PRINT ALL INFORMATION**

RECEIVED BY: \_\_\_\_\_ DEPT.: \_\_\_\_\_

DATE: \_\_\_\_\_

DATE RESPONDED TO: \_\_\_\_\_ Read  or pick up at East Bank Parish Attorney's Office

TOTAL# COPIES: \_\_\_\_\_ OTHER COSTS: \_\_\_\_\_

TOTAL COSTS: \$ \_\_\_\_\_ (ALL COSTS MUST BE PAID PRIOR TO RELEASE)

NO RECORDS/INFORMATION FOUND

**Robert C. Jenkins**  
Attorney at Law

631 St. Charles Avenue  
New Orleans, LA 70130 USA

(504) 586-1616

**VIA EMAIL ONLY: [publicrecordsrequest@jeffparish.net](mailto:publicrecordsrequest@jeffparish.net)**

Parish of Jefferson  
East Bank Parish Attorney's Office  
1221 Elmwood Park Boulevard, Suite 701  
Jefferson, Louisiana 70123

**Re: PUBLIC RECORDS REQUEST**

**INFORMATION REQUESTED:**

- 1) A copy of the entire Charter for the government of Jefferson Parish in effect in 1996 and any amendments thereto from 1996 to 2010.
- 2) A copy of the "Payroll Salary History" of Karen Parker and Karen Parker Broussard for the fiscal years from January 3, 1992 to January 2, 2010.
- 3) A copy of the "Payroll Salary History" of Thomas G. Wilkinson for the fiscal years from January 1, 1996 to April 1, 2010.
- 3a) A copy of the "Payroll Salary History" of Tim Whitmer for the fiscal years from January 1, 1980 to January 1, 2010.
- 4) A copy of the Jefferson Parish Personnel Department "Annual Eligibility Raise" form used during each of the fiscal years from January 1, 2003 to April 1, 2010.
- 5) A copy of every completed Annual Eligibility Raise form that was executed on behalf of Karen Parker and Karen Parker Broussard for the fiscal years from January 1, 2003 to February 1, 2010.
- 6) A copy of every completed Annual Eligibility Raise form that was executed on behalf of Thomas G. Wilkinson for the fiscal years from January 1, 1996 to March 1, 2010.

- 7) A copy of any form used by the Jefferson Parish Personnel Department to reflect the pay raises granted to Jefferson Parish Employees as a result of the "New Pay Plan" identified on the employees "Payroll Salary History" sheet that increased Parish employees' salaries for the fiscal year beginning approximately on January 1, 1999 through December 31, 1999, and a copy of the entire "New Pay Plan" adopted by Parish Government.
- 8) A copy of the completed form used by the Jefferson Parish Personnel Department that was executed on behalf of Karen Parker in the fiscal year 1999 under the "New Pay Plan".
- 9) A copy of the completed form used by the Jefferson Parish Personnel Department that was executed on behalf of Thomas G. Wilkinson in the fiscal year 1999 under the "New Pay Plan".
- 10) A copy of the form used by the Jefferson Parish Personnel Department to grant pay raises to Parish Employees under the "Pay Plan Parish wide" identified on the "Payroll Salary History" of Parish employees in the fiscal year 2007 and a copy of the entire "Pay Plan Parish wide" adopted by Parish Government.
- 11) A copy of the completed form used by the Jefferson Parish Personnel Department that was executed on behalf of Karen Parker Broussard in the fiscal year 2007 under the "Pay Plan Parish wide" adopted by Parish Government.
- 12) A copy of the completed form used by the Jefferson Parish Personnel Department that was executed on behalf of Thomas G. Wilkinson in the fiscal year 2007 under the "Pay Plan Parish wide" adopted by Parish Government.
- 13) A copy of the form used for a "Discretionary Raise" by the Jefferson Parish Personnel Department for the fiscal years 2003 to 2010.
- 14) A copy of every completed Discretionary Raise form executed on behalf of Karen Parker and Karen Parker Broussard for the fiscal years 2003 to 2010.
- 15) A copy of every completed Discretionary Raise form executed on behalf of Thomas G. Wilkinson for the fiscal years 2003 to 2010.
- 16) A copy of the form used for "Demotion" by the Jefferson Parish Personnel Department for the fiscal years 2003 to 2010.
- 17) A copy of the completed "Demotion" form executed on behalf of Karen Parker in the fiscal year 2003.

- 18) A copy of the form used for the transfer of a Parish employee from one department to another department.
- 19) A copy of the completed form used by the Jefferson Parish Personnel Department that was executed regarding the transfer of Karen Parker/Karen Parker Broussard from the office of the Parish Attorney to any other department of the Parish from 2003 to 2010;
- 20) A copy of all Jefferson Parish Department of Personnel Rules and Regulations and the Personnel Board resolutions or formal voting actions that created or approved said Personnel Rules and Regulations as well as all Jefferson Parish Council Ordinances and Resolutions that created or approved said Personnel Rules and Regulations as they relate to the following categories for Parish employees:
  - a) Annual Eligibility Raises;
  - b) Discretionary Raises;
  - c) Establishing Salary Ranges;
  - d) Initiating Pay Plan Studies and the process of approving said New Pay Plan Studies for the purpose of calculating pay raises for Parish employees and implementing the recommended pay raises contained in said new Pay Plan Studies;
  - e) Longevity Raises;
  - f) Tenure Awards;
  - g) Vacations;
  - h) Annual Leave;
  - i) Five years (plus) eligibility for 3.5 hours of annual leave every two weeks;
  - j) All other forms of raises and benefits for Parish employees;
  - k) Transfers of employees from one Parish department to another;
  - l) Assignments of employees to work with other Parish Departments;
  - m) Policy for the elimination of "break in service" for "at-will" employees who resign from Parish Government and are

subsequently re-hired by Parish government that entitles them to benefit from their previous years of Parish service regarding pay raises and other parish employee benefits;

- n) Civil Service Policy for civil service employees who resign from Parish Government and are subsequently re-hired by Parish Government that entitles them to benefit from their previous years of Parish service regarding pay raises and other parish employee benefits;
  - o) All Ordinances, and Personnel Rules and Regulations relating to the authority or the discretion of a department head, independent of the Chartered Powers of the Parish President, to award compensatory ("comp") time to employees under their supervision. Also, what limited circumstances is it allowed to be granted and what prior approval of the department head is required and in what form;
- (21) A copy of certain specific sections of the Official Council Adopted Budgets, the Amendments to said Budgets, and the Budget Message from the Parish President to the Council attached to each Budget document submitted to Council for their consideration for the fiscal years: 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009 and 2010, which said requested sections are:
- a) Office of the Parish President including Assistants, secretarial staffs, personnel employed by virtue of co-operative endeavor agreements with Jefferson Parish and other agencies with the names and maximum salaries each year of each person employed in the office of the Parish President;
  - b) the Offices of the Parish Council, including Council Aides, secretarial staff, office of Budget and Research, etc., with the names and maximum salaries each year of each person employed in the Offices of the Parish Council;
  - c) The Offices of the Parish Attorney including all assistant parish attorneys, full-time and part-time paralegals, secretarial staff, and other parish services functioning under auspices of the Parish Attorney's Office Budget such as parish security operation and I.D. Management, expenses, including salaries and inter-agency agreements for personnel with the Jefferson Parish Sheriff's Office, or other such agencies, with the names and maximum salaries each year of each person employed in or under the auspices of the Parish Attorney's Office;

- d) The sections of the Budget dealing specifically with internal Security Operations and I.D. Management, with the names and maximum salary each year of each person employed within said Budget Section;
  - e) Copies of all ordinances, Resolutions, Memos, Correspondence and Personnel Rules and Regulations regarding the description of the operations and functions, staffing and salaries, of the operation known as "I.D. Management" and/or "Security Department" and/or "Security Operations" and/or any other titles attributed to that operation which was located in the East Bank Regional Library, from January 1, 1996 to January 1, 2010, including all pages that mention or list cost for said operation in the official Annual Jefferson Parish Budgets from 1996 to 2010;
- 22) A complete list of the names of all the "at will" parish employees who resigned from Parish government and who were later rehired by Parish Government and were granted an elimination of their "break in service" from the Parish Administration, including the dates of their resignations, together with a copy of their letter and/or forms they signed documenting their resignation, the date of their re-hire by the Parish, together with a copy of the Personnel Form documenting their re-hire by the Parish and a copy of any letter, form, memo, notation, or other documentation regarding the elimination of their "break in service" that evidences under whose Administration and under whose authority said elimination of "break in service" was approved and granted for each employee from the years 1970 to 2010;
- 23) A complete list of the names of all the "Civil Service" Parish employees who resigned from Parish Government and who were later rehired by Parish Government and were granted an elimination of their "break in service" from the Civil Service Board, including the dates of their resignations, together with a copy of their letter and/or forms they signed documenting their resignation, the date of their re-hire by the Parish, together with a copy of the Personnel Form documenting their re-hire by the Parish, and a copy of any letter, form, memo, notation, or other documentation regarding the elimination of their "break in service" that evidences under whose Administration and under whose authority said elimination of "break in service" was approved and granted for each employee from the years 1970 to 2010;
- 24) A Certified Copy from the Parish Clerk of the Parish Council's vote on the nomination of or action taken regarding the appointment by Parish President Mike Yenni of Thomas G. Wilkinson as Parish Attorney in 1992;

- 25) A Certified Copy from the Parish Clerk for the Parish Council resolution approving the nomination/appointment by Parish President Tim Coulon of Thomas G. Wilkinson as Parish Attorney in 1996;
- 26) A Certified Copy from the Parish Clerk of the Parish Council resolution approving the nomination/appointment by Parish President Tim Coulon of Thomas G. Wilkinson as Parish Attorney in 2000;
- 27) A Certified Copy from the Parish Clerk of the Parish Council resolution approving the nomination/appointment by Parish President Aaron Broussard of Thomas G. Wilkinson as Parish Attorney in 2004;
- 28) A Certified Copy from the Parish Clerk of the Parish Council resolution approving the nomination/appointment by Parish President Aaron Broussard of Thomas G. Wilkinson as Parish Attorney in 2008;
- 29) A Transcript of the actual Parish Council discussion regarding the Resolution itemized in 24); 25); 26); 27); and 28) above stated;
- 30) A Certified Copy of the official minutes of the Jefferson Parish Council Meeting regarding the discussion and outcome of agenda items 24); 25); 26); 27); and 28) above stated;
- 31) A copy of any correspondence, including but not limited to a letter, e-mail or memo, etc. from Council Chairman Aaron Broussard in 2003 addressed to Parish President Tim Coulon to hire Karen Parker as an employee in the Parish Attorney's office in any capacity, and in particular as a paralegal, or more specifically as a paralegal supervisor;
- 32) A copy of any correspondence, including but not limited to a letter, e-mail or memo, etc. from Council Chairman Aaron Broussard in 2003 addressed to Tim Whitmer recommending Karen Parker as a candidate to be employed in the Parish Attorney's office in any capacity, and in particular as a paralegal, or more specifically as a paralegal supervisor;
- 33) A copy of any correspondence, including but not limited to a letter, e-mail or memo, etc. from Council Chairman Aaron Broussard in 2003 addressed to Tom Wilkinson, Parish Attorney to hire Karen Parker as an employee in the Parish Attorney's office in any capacity, and in particular as a paralegal, or more specifically as a paralegal supervisor;
- 34) A copy of any correspondence including letter, e-mail, memo, etc. from Parish President Tim Coulon, Tim Whitmer, or Tom Wilkinson, Parish Attorney in 2003 to Council Chairman Aaron Broussard regarding a response to any request discovered made by Chairman Broussard as described in 31); 32); and 33) enumerated above;

- 35) A copy of any correspondence including letter, e-mail, memo, etc. from Karen Parker in 2003 to Parish President Tim Coulon requesting to be considered for employment in the Parish Attorney's Office in any capacity, and in particular a paralegal, and more specifically as a paralegal supervisor;
- 35a) A copy from the Personnel Board of records indicating the salary range of a Paralegal Supervisor in 2003, and for 2007 through 2010. Also a copy of what Personnel Rules and Regulations would allow for discretion to be exercised by the Parish President, under his chartered powers, to establish starting salary for a Paralegal Supervisor based on prior years of service, tenure with the Parish and experience working for the Parish.
- 35b) A copy of the job description for the position of Paralegal Supervisor in the Parish Attorney's office in 2003. Copies of any amendments to said job description from 2003 to 2010 including, but not limited to, Acting Parish President Steve Theriot's qualification of "experience working in the field" that was referred to in his public written response of compliance with the State Auditors Report during his "acting" tenure.
- 36) A copy of any correspondence including letter, e-mail, memo, etc. from Karen Parker in 2003 to Tim Whitmer requesting to be considered for employment in the Parish Attorney's Office in any capacity, and in particular a paralegal, and more specifically as a paralegal supervisor;
- 37) A copy of any correspondence including letter, e-mail, memo, etc. from Karen Parker in 2003 to Tom Wilkinson, Parish Attorney, requesting to be considered for employment in the Parish Attorney's Office in any capacity, and in particular a paralegal, and more specifically as a paralegal supervisor;
- 38) A copy of any correspondence including letter, e-mail, memo, etc. from Parish President Tim Coulon addressed to Karen Parker regarding a response to any request discovered made by Karen Parker described in 35); 36); and 37) enumerated above.
- 39) A copy of any correspondence including letter, e-mail, memo, etc. from Tim Whitmer addressed to Karen Parker regarding a response to any request discovered made by Karen Parker described in 35); 36); and 37) enumerated above.
- 40) A copy of any correspondence including letter, e-mail, memo, etc. from Tom Wilkinson, Parish Attorney, addressed to Karen Parker regarding a response to any request discovered made by Karen Parker described in 35); 36); and 37) enumerated above.



- 41) A copy of any correspondence including letter, e-mail, memo, etc. from Parish President Tim Coulon offering Karen Parker the opportunity to fill the vacancy in the Parish Attorney's office entitled "Paralegal Supervisor" including any attachments, including but not limited to the job description for said Paralegal Supervisor vacancy and any special qualifications required to be hired as a Paralegal Supervisor;
- 42) A copy of any correspondence including letter, e-mail, memo, etc. from Tim Whitmer offering Karen Parker the opportunity to fill the vacancy in the Parish Attorney's office entitled "Paralegal Supervisor" including any attachments, including but not limited to the job description for said Paralegal Supervisor vacancy and any special qualifications required to be hired as a Paralegal Supervisor;
- 43) A copy of any correspondence including letter, e-mail, memo, etc. from Tom Wilkinson, Parish Attorney, offering Karen Parker the opportunity to fill the vacancy in the Parish Attorney's office entitled "Paralegal Supervisor" including any attachments, including but not limited to the job description for said Paralegal Supervisor vacancy and any special qualifications required to be hired as a Paralegal Supervisor;
- 44) A copy of any correspondence including but not limited to a letter, e-mail, memo, etc., a Personnel Department "Request to Fill a Vacant Position" form from Parish President Tim Coulon notifying Karen Parker that she must have any special qualifications in the form of a paralegal certificate or a paralegal associate degree (college, junior college, trade school, or otherwise); or evidence of her passing any test, course, etc. administered by any college, junior college, trade school, etc.
- 45) A copy of any correspondence including but not limited to a letter, e-mail, memo, etc., a Personnel Department "Request to Fill a Vacant Position" form from Tim Whitmer notifying Karen Parker that she must have any special qualifications in the form of a paralegal certificate or a paralegal associate degree (college, junior college, trade school, or otherwise); or evidence of her passing any test, course, etc. administered by any college, junior college, trade school, etc.
- 46) A copy of any correspondence including but not limited to a letter, e-mail, memo, etc., a Personnel Department "Request to Fill a Vacant Position" form from Tom Wilkinson, Parish Attorney, notifying Karen Parker that she must have any special qualifications in the form of a paralegal certificate or a paralegal associate degree (college, junior college, trade school, or otherwise); or evidence of her passing any test, course, etc. administered by any college, junior college, trade school, etc.

- 47) A copy of any correspondence including but not limited to a letter, e-mail, memo, etc., a Personnel Department "Request to Fill a Vacant Position" form from the Jefferson Parish Personnel Department notifying Karen Parker that she must have any special qualifications in the form of a paralegal certificate or a paralegal associate degree (college, junior college, trade school, or otherwise); or evidence of her passing any test, course, etc. administered by any college, junior college, trade school, etc.
- 48) A copy of any correspondence including but not limited to a letter, e-mail, memo, etc., a Personnel Department "Request to Fill a Vacant Position" form from any Jefferson Parish official, elected or appointed, acting in their official capacity with full authorization, notifying Karen Parker that she must have any special qualifications in the form of a paralegal certificate or a paralegal associate degree (college, junior college, trade school, or otherwise); or evidence of her passing any test, course, etc. administered by any college, junior college, trade school, etc.
- 49) A Certified Copy of any Parish Ordinance or an Amendment to an Ordinance passed by the Jefferson Parish Council between 1970 and 2010 that requires a special qualification of a paralegal certificate; paralegal certification; paralegal degree; paralegal associate degree; or course testing completed from any college, junior college, trade school, or a license of any kind in order to be hired as a paralegal or paralegal supervisor in the Parish Attorney's Office;
- 50) A copy of the transcript of each and every Jefferson Parish Council Meeting evidencing the discussion of any and all Council Members and the discussion during the public hearing portion of the consideration of said Ordinance(s) regarding said Ordinance(s) and amendment to Ordinance(s) described in 49) above enumerated between 1970 and 2010;
- 51) A Certified Copy of the portion of the Official Minutes of the Jefferson Parish Council for each and every Jefferson Parish Council meeting evidencing the consideration of said Ordinance(s) and amendments to said Ordinance(s) described in 49) above enumerated between 1970 and 2010;
- 52) Copies of all correspondence, including but not limited to letters, e-mails, memo, etc. initiated by any Jefferson Parish Councilmen to other Jefferson Parish Councilmen, the Parish President, the Parish President's staff, or Personnel Department, the Parish Attorney or the Parish Attorney's staff, as well as copies of all correspondence in response thereto by other Parish Councilmen, the Parish President, the Parish President's staff, or Personnel Department, the Parish Attorney, and the Parish Attorney's staff that was initiated regarding any Parish Ordinance(s) or amendment(s) thereof, that required a special qualification of a paralegal certificate; paralegal certification; paralegal degree; paralegal associate degree or

course testing completed or license from any college, junior college, trade school in order to be hired as a paralegal or paralegal supervisor in the Office of the Parish Attorney from 1970 to 2010;

- 53) A copy of any and all documents that exist in Jefferson Parish Government that define, with specificity, exactly what type or kind of special requirement(s) for paralegals was the Jefferson Parish Council referring to in their passage of any Ordinance(s) or amendment(s) to said Ordinance(s) described in 49), above enumerated, i.e., a paralegal certificate of what type and from where; a paralegal certification of what type and from where; a paralegal degree of what type and from where; a paralegal associate degree of what type and from where, or a paralegal license of what type and from where, and copies of what official action or vote, if any, of the Jefferson Parish Council was taken, when and where, that in fact made any references to the requested documents herein as an official extension of the original Ordinance(s) or amended Ordinance(s) on this subject. In addition, the transcript of any public discussion or votes of the Jefferson Parish Council on this subject, and a Certified Copy of the Official Minutes of the Jefferson Parish Council Meeting that such requested documents were discussed and/or voted on from 1970 to 2010;
- 54) A copy of any correspondence, including but not limited to, a letter, e-mail, memo, etc. received by Jefferson Parish Government addressed to the Office of the Parish President and/or the offices of the Jefferson Parish Council and/or the Office of the Parish Attorney from the American Bar Association, Louisiana Bar Association, Jefferson Bar Association, the Louisiana Supreme Court, any Louisiana Appellate Court, or the Twenty-Fourth Judicial District Court from 1970 to 2010 suggesting, requesting, or requiring that the Jefferson Parish Council pass an Ordinance(s) to require that paralegals hired by the Parish must have a paralegal certificate, a paralegal certification, a paralegal degree, a paralegal associate degree, a paralegal license from a college or junior college, or trade school, etc.
- 55) A list of the names of all persons hired as a paralegal or paralegal supervisor in the Office of the Parish Attorney from 1970 to 2010, and state which of these persons possessed a paralegal certificate, paralegal certification, a paralegal degree, a paralegal associate degree, a paralegal license from a college or junior college, or trade school, etc.;
- 56) A copy of the formal written notice(s) given to each person hired above as a paralegal or paralegal supervisor that as a condition of employment each person had to produce, and a copy of what each person did in fact produce, to Parish Government, as bona fide proof that each person had obtained a paralegal certificate; a paralegal degree; a paralegal associate degree; a

paralegal license from a college or junior college; or trade school, etc. from 1970 to 2010;

- 57) A Certified Copy of the written official response of the Parish President Steve J. Theriot to Mr. Daryl G. Purpera, CPA, CFE Legislative Auditor dated September 27, 2010, regarding Jefferson Parish Compliance Audit Report Draft dated August 26, 2010, which same total is 6 pages;
- 58) A Certified Copy of the Louisiana Legislative Auditor Compliance Audit issued October 6, 2010 and forwarded to the Jefferson Parish President, Steve Theriot, and Members of the Jefferson Parish Council, totaling 84 pages;
- 59) A copy of Parish President John Young's new policy that banned his department directors from rescinding resignations, referred to as an elimination of "break in service", that went into effect on Tuesday, December 21, 2010 according to the Times Picayune story published on Wednesday, December 22, 2010.
- 60) Copies of any correspondence including but not limited to letters, e-mails, memos, etc. between President John Young and his executive staff and directors, including the Parish Attorney's office, including any legal opinions he may have received as to the legality of the existing policy and any need to grandfather existing employees receiving benefits from existing policy and the Personnel Department, as well as any similar type correspondence with any members of the Jefferson Parish Council members and their staff that discussed the need for this new policy, the purpose of this new policy, and the history of the long-standing existing policy of elimination of "break in service" for all "at-will" employees;
- 61) A Certified Copy of the Ordinance passed by the Jefferson Parish Council on or about Wednesday, April 8, 2011 that banned the practice of allowing the elimination of a "break in service" for former Parish "at-will" employees who return to Parish employment at a later date;
- 62) A transcript of that portion of the Jefferson Parish Council meeting that dealt with the agenda item regarding the Ordinance described in 61) above stated, including all public discussion by Members of the Jefferson Parish Council and Parish President Young, as well as all discussion during the Public Hearing on said Ordinance by both members of the general public and members of the Jefferson Parish Council and Parish President Young;
- 63) A Certified Copy of the portion of the Official Minutes of the Jefferson Parish Council of the April 8, 2011 public meeting that dealt with the discussion and vote of the Ordinance described in 59) and 60) above stated;

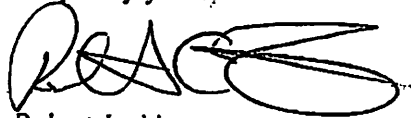
- 64) Copies of all correspondence in 2010 and 2011 including but not limited to letters, e-mails, memos, etc. between Council Members, their staff, and attorney, and between Council Members and Parish President John Young, his executive staff, the Parish Attorney's office and the Personnel Department, as well as said correspondence between Parish President John Young and his executive staff, Parish Attorney's Office and Personnel Department all regarding the information of the Ordinance described in 59) and 60) above stated, the discussion of the need for such an Ordinance, the purpose of such an Ordinance, any review of the history of the long-standing policy of the elimination of "break in service" of a returning parish employee, and any legal opinions regarding the legality of the then existing long-standing policy of the elimination of "break in service" of any returning employees, the citations of any Louisiana or United States litigation cases regarding the policy of elimination of "break in service", and any legal liability for the Parish in eliminating the then existing policy of elimination of "break in service" for returning Parish employees, especially regarding the need to "grandfather", leave undisturbed, and not eliminate the employees benefits of existing Parish employees who at the time of the vote of said Ordinance were continuing to receive the benefits that accrued to them by having their "break in service" eliminated previously;
- 64) The list of names of existing Parish employees who, at the time of the passage of the Ordinance described in 60) above stated, were benefitting from having their "break in service" eliminated and who continued to enjoy those same benefits after the passage of said Ordinance;
- 65) The list of names of existing Parish employees who, at the time of the Public Records Request in 2012 continue to enjoy the employee benefits resulting from having their "break in service" eliminated by Parish Government;
- 66) A certified copy of the Jefferson Parish Civil Service Board policy in effect in 2002 of allowing civil service employees of Jefferson Parish to apply for and be eligible to receive the elimination of the "break in service" upon their subsequent re-hiring by Jefferson Parish Government;
- 67) A certified copy of any amendments to the Civil Service Board policy of allowing civil service employees to apply for and be eligible to receive the elimination of their "break in service" upon their subsequent re-hiring by Jefferson Parish Government from 2002 to 2011;
- 68) A list of all civil service employees who applied to the Civil Service Board for an elimination of their "break in service" upon their re-hiring by Jefferson Parish Government from 2002 to 2011;

- 69) A color copy of each Official Photo taken of the Parish President and Parish Council used for publicity and publication purposes during the years 1992 to 2010.

We trust you will give this matter your prompt attention.

With kindest regards, I remain,

Very truly yours,

A handwritten signature in black ink, appearing to read 'R. Jenkins', with a large, sweeping flourish extending to the right.

Robert Jenkins