

**SANTA MONICA COMMUNITY COLLEGE DISTRICT, ET. AL.,  
LIST OF OUTSTANDING DOCUMENTS DUE FOR COPYING AND INSPECTION  
PURSUANT TO THE CALIFORNIA PUBLIC RECORDS ACT**

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**FIFTH WRITTEN CPRA REQUEST TO PAT GREEN, DATED OCTOBER 24, 2005**

(SENT VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED)

DECEMBER 18, 2005

**(FINAL REVISED VERSION)**

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**SET FIVE: REQUEST NO. 1**

The summary report submitted by Jim Keeshen (a.k.a., James Keeshen) regarding his Fall 2003 sabbatical (including, but not limited to, statements concerning the academic merit, relevance, and benefits of the leave) as submitted to the personnel office and placed in the instructor's permanent file.

WE HAVE RECEIVED NO DOCUMENTS OR INSPECTION TO DATE. YOU FURTHER INDICATED THAT PROF. KEESHEN DID NOT FILE THIS MANDATORY REPORT, DESPITE THE FACT THAT IT WAS DUE WITHIN 60 DAYS OF THE EMPLOYEE'S RETURN TO WORK FROM HIS SABBATICAL. PLEASE CONFIRM IN WRITING THAT THIS REPORT DOES NOT EXIST.

ADDITIONALLY, PURSUANT TO YOUR LETTER, DATED OCTOBER 26, 2005, YOU STATED THAT "... SINCE THE PERSONNEL FILE CONTAINS CONFIDENTIAL INFORMATION EXEMPT UNDER THE PUBLIC RECORDS ACT, THE DISTRICT CANNOT PERMIT YOU TO INSPECT MR. KEESHEN'S PERSONNEL FILE..." I DENY THIS CONTENTION. PURSUANT TO SANTA MONICA COLLEGE'S ACCREDITATION 2004 SELF-STUDY STANDARD III: RESOURCES AT DESCRIPTION IIIA.3(a) AND IIIA.3(b), IT STATES THAT "HUMAN RESOURCES MAINTAINS THE OFFICIAL PERSONNEL FILE FOR EACH EMPLOYEE" AND THAT "CONFIDENTIAL INFORMATION, SUCH AS MEDICAL INFORMATION, IS MAINTAINED SEPARATELY." THEREFORE, BASED ON THIS FILING SYSTEM, ALL CONFIDENTIAL INFORMATION HAS BEEN SEPARATED FROM THE PERSONNEL FILE.

PLEASE COMPLY WITH THIS REQUEST.

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**SET FIVE: REQUEST NO. 2**

The contract signed by Jim Keeshen (a.k.a., James Keeshen) "guaranteeing the completion of his program as approved by the Sabbatical / Fellowship / Computer Loan Committee.

WE HAVE RECEIVED NO DOCUMENTS OR INSPECTION TO DATE. YOU INDICATED THAT THIS INFORMATION WAS CONFIDENTIAL. I DENY THIS CONTENTION AND STATE THAT DISCLOSURE IS MANDATORY GIVEN THE FACT THAT ALL DISTRICT SABBATICALS ARE TO SUPPORT THE GOALS AND MISSIONS OF SANTA MONICA COLLEGE. FURTHERMORE, PURSUANT TO THE SUMMARY OF PROF. KEESHEN'S SABBATICAL, IT WAS TO BE UNDERTAKEN TO BENEFIT THE STUDENTS OF THE ACADEMY OF ENTERTAINMENT & TECHNOLOGY WITH GREATER OPPORTUNITIES WITHIN THE ENTERTAINMENT INDUSTRY. ADDITIONALLY, OTHER SMC PROFESSORS MAKE BOTH THEIR SABBATICAL APPLICATIONS AND REPORTS AVAILABLE ONLINE ON SMC'S WEBSITE, SO THESE DOCUMENTS ARE NOT PRIVILEGED, BUT PUBLIC RECORD.

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### **SET FIVE: REQUEST NO. 3**

Any and all documents by the Joint Academic Senate Sabbaticals and Fellowships Committee including reviews, reports, recommendations, approval, denials, etc. for Jim Keeshen's sabbatical application for Fall 2003.

WE HAVE RECEIVED NO DOCUMENTS OR INSPECTION TO DATE. YOU INDICATED THAT THIS INFORMATION WAS CONFIDENTIAL. I DENY THIS CONTENTION AND STATE THAT DISCLOSURE IS MANDATORY GIVEN THE FACT THAT ALL DISTRICT SABBATICALS ARE TO SUPPORT THE GOALS AND MISSIONS OF SANTA MONICA COLLEGE. FURTHERMORE, PURSUANT TO THE SUMMARY OF PROF. KEESHEN'S SABBATICAL, IT WAS TO BE UNDERTAKEN TO BENEFIT THE STUDENTS OF THE ACADEMY OF ENTERTAINMENT & TECHNOLOGY WITH GREATER OPPORTUNITIES WITHIN THE ENTERTAINMENT INDUSTRY. ADDITIONALLY, OTHER SMC PROFESSORS MAKE BOTH THEIR SABBATICAL APPLICATIONS AND REPORTS AVAILABLE ONLINE ON SMC'S WEBSITE, SO THESE DOCUMENTS ARE NOT PRIVILEGED, BUT PUBLIC RECORD.

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COLLEGE'S ACCREDITATION 2004 SELF-STUDY STANDARD III: RESOURCES AT DESCRIPTION IIIA.3(a) AND IIIA.3(b), IT STATES THAT "HUMAN RESOURCES MAINTAINS THE OFFICIAL PERSONNEL FILE FOR EACH EMPLOYEE" AND THAT "CONFIDENTIAL INFORMATION, SUCH AS MEDICAL INFORMATION, IS MAINTAINED SEPARATELY." THEREFORE, BASED ON THIS FILING SYSTEM, ALL CONFIDENTIAL INFORMATION HAS BEEN SEPARATED FROM THE PERSONNEL FILE.

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**SET FIVE: REQUEST NO. 4**

Jim Keeshen's sabbatical application for Fall 2003, including any documents describing how the sabbatical proposal supports the mission and goals of Santa Monica College, and any and all documents attached to the application and/or submitted in support of supplement.

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**SET FIVE: REQUEST NO. 5**

Any and all documents pertaining to Jim Keeshen's sabbatical taken during Fall Semester 2003, including applications, reports, final reports, bills, invoices, receipts, payments, correspondence, videotapes, emails, and documents relating to a salary increase with SMC.

WE HAVE RECEIVED NO DOCUMENTS OR INSPECTION TO DATE. YOU INDICATED THAT THIS INFORMATION WAS CONFIDENTIAL. I DENY THIS CONTENTION AND STATE THAT DISCLOSURE IS MANDATORY GIVEN THE FACT THAT ALL DISTRICT SABBATICALS ARE TO SUPPORT THE GOALS AND MISSIONS OF SANTA MONICA COLLEGE. FURTHERMORE, PURSUANT TO THE SUMMARY OF PROF. KEESHEN'S SABBATICAL, IT WAS TO BE UNDERTAKEN TO BENEFIT THE STUDENTS OF THE ACADEMY OF ENTERTAINMENT & TECHNOLOGY WITH GREATER OPPORTUNITIES WITHIN THE ENTERTAINMENT INDUSTRY. ADDITIONALLY, OTHER SMC PROFESSORS MAKE BOTH THEIR SABBATICAL APPLICATIONS AND REPORTS AVAILABLE ONLINE ON SMC'S WEBSITE, SO THESE DOCUMENTS ARE NOT PRIVILEGED, BUT PUBLIC RECORD.

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#### **SET FIVE: REQUEST NO. 6**

Consultant contract between SMC and Dr. Joan Abrahamson "to provide consultant services for the Academy of Entertainment and Technology, the Institute for International Trade, and other projects in the planning and development area" including bills, receipts, payments, invoices, proposals, reports & final reports, etc. (referenced in SMC Board of Trustees Minutes, dated June 7, 1999).

WE HAVE NOT RECEIVED INSPECTION TO DATE. WE HAVE RECEIVED SOME DOCUMENTS FOR THE YEARS 2000-2001, BUT HAVE NOT RECEIVED ANYTHING FOR OTHER YEARS NOR HAVE WE RECEIVED ANY DOCUMENTS FOR 1999, THE YEAR WE REQUESTED.

ADDITIONALLY, THE BREAKDOWN OF SERVICES IS INCOMPLETE FOR ADDITIONAL SUPPORT HOURS BILLED BY AND THROUGH JOAN ABRAHAMSON'S NON-PROFIT JEFFERSON INSTITUTE FOR HER EMPLOYEE, STACY INGBER. MS. ABRAHAMSON HAS SAT ON THE ACADEMY'S ADVISORY BOARD SINCE ITS INCEPTION ON OR ABOUT 1997 TO THE PRESENT. ACCORDINGLY, ANY AND ALL DOCUMENTS REGARDING HER ROLE AND PAYMENTS IN THIS REGARD SHOULD BE DISCLOSED. WE HAVE NO RECEIPTS FOR VARIOUS ITEMS, SERVICES, AND ALLEGED EXPENSES BILLED ON HER INVOICES. PLEASE PROVIDE THESE. I WILL FURTHER REVIEW THESE DOCUMENTS FOR ADDITIONAL INFORMATION WHICH I FEEL SHOULD BE DISCLOSED IN ORDER TO FULFILL THIS REQUEST IN ITS ENTIRETY AND RESERVE THE RIGHT TO SUPPLEMENT MY REQUEST.

PLEASE COMPLY WITH THIS REQUEST.

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**SET FIVE: REQUEST NO. 7**

The Santa Monica College Foundation Form 990 income tax filings / forms for the following years: 2004, 2003, 2002, 2001, 2000, 1999, 1998, 1997, 1996, and 1997, inclusive.

WE HAVE RECEIVED NO DOCUMENTS OR INSPECTION TO DATE.

PLEASE COMPLY WITH THIS REQUEST.

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**SET FIVE: REQUEST NO. 8**

The KCRW Foundation Form 990 income tax filings / forms for the following years: 2004, 2003, 2002, 2001, 2000, 1999, 1998, 1997, 1996, and 1997, inclusive.

WE HAVE RECEIVED NO DOCUMENTS OR INSPECTION TO DATE.

PLEASE COMPLY WITH THIS REQUEST.

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**SET FIVE: REQUEST NO. 9**

The Santa Monica Board of Trustees Minutes and Agendas for the following months: January 1996 through December 1996, inclusive.

WE HAVE RECEIVED NO DOCUMENTS OR INSPECTION TO DATE.

PLEASE COMPLY WITH THIS REQUEST.

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**SET FIVE: REQUEST NO. 10**

The Santa Monica Board of Trustees Minutes and Agendas for the following months: January 1997 through December 1997, inclusive.

WE HAVE RECEIVED NO DOCUMENTS OR INSPECTION TO DATE. IS IT POSSIBLE TO PLACE ADOBE PDF FILES OF THESE DOCUMENTS ONLINE?

PLEASE COMPLY WITH THIS REQUEST.

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**SET FIVE: REQUEST NO. 11**

The Santa Monica Board of Trustees Minutes and Agendas for the following months: January 1998, February 1998, March 1998, April 1998, May 1998, and June 1998, inclusive.

WE HAVE RECEIVED NO DOCUMENTS OR INSPECTION TO DATE. IS IT POSSIBLE TO PLACE ADOBE PDF FILES OF THESE DOCUMENTS ONLINE?

PLEASE COMPLY WITH THIS REQUEST.

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**SET FIVE: REQUEST NO. 12**

The Santa Monica Board of Trustees Minutes and Agendas for the following months: July 2000, August 2000, September 2000, October 2000, and November 2000, inclusive.

WE HAVE NOT RECEIVED INSPECTION TO DATE OF PHYSICAL FILES OR AUDIO TAPES. HOWEVER, THESE DOCUMENTS WERE PLACED ONLINE IN ADOBE PDF FORMAT.

PLEASE COMPLY WITH THIS REQUEST.

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