



WHERE ENERGY, ENVIRONMENT, AND TRUTH MEET

November 18, 2019

Robert Baldrige
Manager, Information Practices
10920 Wilshire Blvd., Mail Code #143348
Los Angeles, CA 90095-1433
Via email: records@ucla.edu

Dear Sir or Madam:

On behalf of Energy Policy Advocates (EPA), recognized by the Internal Revenue Service as a non-profit public policy institute under § 501(c)(3) of the Internal Revenue Code, pursuant to the California Government Code §§ 6250 *et. seq.*, I request that that the custodian of University records produce, within 10 business days, a copy of the following public record:

- 1. any presentations given by Cara Horowitz, Ann Carlson, and/or Sean Hecht at a meeting at Harvard Law School on April 25, 2016, in whatever form you possess it/ them, whether as written text, PDF, or slide show (e.g., Power Point, Keynote).**

Information obtained from public records that may assist you in identifying this presentation includes that this meeting was titled Potential State Causes of Action Against Major Carbon Producers, attended by Ms. Horowitz and at which UCLA faculty addressed consumer protection claims. Other public records show the co-host Union of Concerned Scientists describes the audience as “senior staff from attorney’s [sic] generals offices...climate science colleagues, as well as prospective funders.” As such, no conceivable privilege applies here.

We ask that, in the event that a faculty member indicates they deleted the document, that you search their email accounts for any correspondence transmitting the presentation, while also noting that **we request records on the University's system**, e.g., its backend logs, not those which survive on a faculty member's specific device or account.

We reserve the right to inspect or assign a representative to inspect any records if for any reason the Office cannot or will not provide copies.

If the records are not currently in your possession, please notify me in writing, and provide any and all information about where and with whom the records may be found, requested, viewed or copied, and/or when they will become available to your office. Given the nature of the records responsive to this request, all should be in electronic format, and therefore there should be no photocopying costs. If there is any cost associated with the searching, copying or production of these records, however, please also notify me in writing immediately.

We understand we owe the office the cost of material, required to satisfy this request. We agree to pay legitimate expenses up to \$50.00. If you estimate costs will exceed that please notify us immediately and break down the expected costs. This information is not, however, being sought for commercial purposes. If for any reason, our request for information cannot be satisfied without cost, then prior to any copying, please notify us immediately with the reasons for the denial and the cost that will be involved. Please produce these records electronically if possible to avoid unnecessary fees and otherwise conserve resources.

In accordance with generally accepted policy, if there are any costs associated with this request, we request a waiver or reduction of any fees connected with this request as disclosure of these requested records are for the public purpose. EPA has no commercial interest possible in

these records and the Office is permitted to and does exercise discretion in waiving or reducing fees on that basis.

This request is being made in the public interest, and furnishing this information will benefit the public's understanding of recent events regarding climate litigation and municipalities which have been filing lawsuits against energy companies and working closely with attorneys general also to pursue opponents of the "climate" policy/political agenda. This information is being requested for the purpose of understanding how state institutions are involved, if at all, in the larger effort feeding this litigation industry.

The requested information is of critical importance to the nonprofit policy advocacy groups engaged on the issue of how public institutions are used toward private ends and/or in conjunction with private interests, news media covering the issues, and any others concerned with government activities on this critical subject, or as the United States Supreme Court once noted in the context of the federal FOIA, what their government, which under open records laws includes publicly funded academic institutions, is up to.

As you know, the law requires that you respond to and fulfill this request within 10 business days. If these records will not be produced within this time, please notify me in writing immediately and explain the reasons why.

If you deny this request or withhold the document responsive to this request, please describe the material withheld and specify in detail the statutory or administrative basis for withholding it. Please cite each specific exemption to the California Government Code that you have determined justifies the refusal to produce the record. All segregable, non-exempt parts of the documents should be provided.

We request you make a timely determination on this request consistent with the statute.

If you have any questions, or require clarification of this request, please feel free contact me at any time using the contact information listed with this request. Thank you for your prompt attention, time and consideration to this matter.

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Respectfully submitted,

Matthew D. Hardin,
Executive Director
Energy Policy Advocates