

DISTRICT COURT, COUNTY OF BOULDER, STATE OF COLORADO 1777 6 <sup>th</sup> Street P.O. Box 4249 Boulder, CO 80306	^ COURT USE ONLY ^
<b>Plaintiffs:</b> <b>FLEET RUSSELL WHITE, JR.</b> , an individual; and <b>PRISCILLA BROWN WHITE</b> , an individual  v.  <b>Defendants:</b>  <b>CITY OF BOULDER</b> , a Colorado home rule municipality and <b>MARK R. BECKNER</b> , in his official capacity as Chief of the Boulder Department of Police and Custodian of records for the Boulder Department of Police	Case Number:  Division:
<b>Plaintiffs proceeding pro se:</b> Fleet Russell White, Jr. Priscilla Brown White	
<b>COMPLAINT AND APPLICATION FOR ORDER TO SHOW CAUSE</b>	

Plaintiffs, Fleet Russell White, Jr. and Priscilla Brown White, proceeding pro se, for their complaint against Defendants City of Boulder and Mark R. Beckner, in his official capacity as Chief of the Boulder Department, allege as follows:

### INTRODUCTION

This action, brought pursuant to the Colorado Criminal Justice Records Act ("CCJRA"), §24-72-301, *et seq.*, C.R.S, seeks to secure access to criminal justice records from the custodian of such records, Chief of the Boulder Department of Police Mark R. Beckner concerning the claims and allegations made by a person named Nancy Krebs, also known as Nancy Jo Krebs ("Krebs"), against Plaintiffs and the investigation of such claims and allegations. On information and belief, Plaintiffs allege that Beckner has in his custody, possession, or control criminal

justice records relating to the claims and allegations of Krebs and the investigation thereof by the Boulder Department of Police and other law enforcement agencies including the Federal Bureau of Investigation.

### **JURISDICTION AND PARTIES**

1. This Court has jurisdiction over the claims herein under the CCJRA. §24-72-305(7), C.R.S.

2. Plaintiffs Fleet Russell White, Jr. and Priscilla Brown White are husband and wife and residents of Boulder Colorado. Each Plaintiff is a “person” and a “person in interest” as defined in the CCJRA. §§24-72-302(9) & (10), C.R.S. Plaintiffs are witnesses in the JonBenet Ramsey homicide investigation and gave sworn testimony to the 1998-1999 Boulder grand jury investigating that homicide.

3. Defendant City of Boulder is a Colorado home rule municipality (“City of Boulder”).

4. The Boulder Department of Police (“Boulder Police”) is a “criminal justice agency” as defined in the CCJRA. §24-72-302(3), C.R.S.

5. Defendant Mark R. Beckner (“Beckner”) is Chief of the Boulder Police. He is both the “custodian” and the “official custodian” of the criminal justice records at issue in this case. §§24-72-302(5) & (8), C.R.S.

6. The CCJRA affords to any person denied access to inspection of any criminal justice record the right to apply to the district court in the district wherein the record is found for an order directing the custodian of such record to show cause why said custodian should not permit the inspection of the record. A hearing on such application must be held at the “earliest practical time,” and, “[u]nless the court finds that the denial of inspection was proper, it shall order the custodian to permit such inspection,” §24-72-305(7), C.R.S.

### **BACKGROUND OF CURRENT CONTROVERSY**

7. On information and belief, Krebs was first interviewed by investigators and officers of the Boulder Police and other criminal justice agencies in relation to the 1996 homicide of JonBenet Ramsey no later than February 2000.

8. On information and belief, Krebs’ claims and allegations were first publicly reported on February 25, 2000 by a front page headline newspaper story that speculated Krebs’ claims and allegations “could mean the Ramsey case is tangled in sexual abuse and involves more people than originally thought.” Barrie Hartman, *DA pursues new Ramsey lead*, (Boulder) DAILY CAMERA (February 25, 2000). That publication caused immediate and widespread speculation that Plaintiffs and members of Plaintiffs’ respective families were somehow

responsible for the JonBenet Ramsey homicide or concealing their knowledge of the circumstances of that homicide. Furthermore, the publication of Krebs' claims and allegations caused immediate and widespread speculation that Plaintiff Fleet Russell White, Jr. and members of his family had committed crimes unrelated to the Ramsey homicide spanning decades involving child abuse, pedophilia, and child pornography. A true and correct copy of the February 25, 2000 article is attached as Exhibit 1.

9. On information and belief, the Boulder Police, in conjunction with other law enforcement agencies, investigated Krebs' claims and allegations, such investigations beginning no later than February 22, 2000. On May 15, 2000 the City of Boulder issued a News Release stating that:

Boulder Police and prosecutors have concluded an investigation that began in February when a 37-year old California woman reported her belief that JonBenet Ramsey was murdered as part of a child sex ring. The investigation found no additional evidence to support this theory.

A true and correct copy of the May 15, 2000 City of Boulder News Release is attached as Exhibit 2.

### **CRIMINAL JUSTICE RECORDS REQUESTS THAT GAVE RISE TO THIS LITIGATION**

10. In 2002, Plaintiffs requested access to criminal justice records from Beckner relative to Krebs' claims and allegations and the investigation thereof. Upon receiving Beckner's denial of that request, Plaintiffs applied to this Court pursuant to the CCJRA seeking an order to permit such access. A hearing before this Court in the matter of *White v. City of Boulder*, was held on September 12, 2002.

11. On September 26, 2002, this Court issued a Ruling and Order in *White v. City of Boulder* directing Beckner to:

...deliver to the Court under seal copies of the documents and evidence pertaining to the Krebs allegations and subsequent investigation for an *in camera* review. Based on that review the Court will determine what, if any, part of the file may be released to Petitioners.

A true and correct copy of that Ruling and Order dated September 26, 2002, in *White v. City of Boulder* is attached as Exhibit 3.

12. On or about October 3, 2002 the Boulder Police submitted to this Court "seven items" relevant to the "Nancy Krebs Investigation" for an *in camera* review. A true and correct copy of Boulder Police Memorandum dated October 3, 2002 identifying and describing the

criminal justice records submitted to this Court in *White v. City of Boulder* is attached as Exhibit 4.

13. On November 3, 2002, this Court issued its Order that "...transcripts of Ms. Krebs' two interviews with the police and (Boulder Police) Detective Trujillo's summary of her interview will be released with some redactions." A true and correct copy of that Order dated November 3, 2002, in *White v. City of Boulder*, is attached as Exhibit 5. Thus, this Court ordered the release of only two of the seven items submitted by the Boulder Police: Transcriptions of Krebs' interviews by Boulder Police on February 22, 2000 and May 10, 2000. The remaining five items, including investigators' reports and findings, were not released.

14. On October 3, 2011, Plaintiffs sent a letter addressed to Beckner requesting, pursuant to applicable Colorado statutes, access to inspect and copy records in Beckner's custody and control relative to Krebs' claims and allegations and the investigation thereof including the five items listed by the October 3, 2002 Boulder Police Memorandum attached hereto as Exhibit 4 that were not ordered released by this Court in *White v. City of Boulder*. A true and correct copy of Plaintiff's October 3, 2011 letter is attached as Exhibit 6.

15. On October 17, 2011, Beckner sent a letter to Plaintiffs denying Plaintiffs' October 3, 2011 request on the following ground:

Your request for this material is denied. These are not records of "official action" as defined in C.R.S. 24-72-302 (7). They are non-disclosable "criminal justice investigative files" pursuant to C.R.S. 24-72-305 (5). There are third party privacy interests that will be impacted by the disclosure of this information. Additionally, disclosure of this information may compromise a pending BPD criminal investigation.

A true and correct copy of Beckner's October 17, 2011 letter is attached as Exhibit 7.

16. On February 19, 2014, Plaintiffs sent a letter to Beckner requesting, pursuant to the CCJRA, §24-72-301 *et seq.*, C.R.S., access to inspect and copy the following criminal justice records:

1. All records including but not limited to meeting notes; memoranda; communications and correspondence; interviews and transcriptions, whether such records are written or electronic, that came into existence at any time during 1997 until this date that refer to, or in any way relate to, the undersigned or any member of our respective families in connection with the claims and allegations of Nancy Krebs, also known as Nancy Jo Krebs, and the investigation thereof by local, state or federal law enforcement agencies, including the Boulder Police Department.

2. All those certain records specified and described in the attached October 3, 2002 City of Boulder Police Department memorandum to the Boulder District Court in *White v. City of Boulder*,

- Item #1: One video tape with images of Lee Hill and Nancy Krebs.
- Item #2: Fourteen (14) photographs related to the Krebs investigation.
- Item #3: Detective Tom Trujillo's fifty-five (55) page report and twenty (20) page Appendices of Krebs investigation.
- Item #4: Detective Jane Harmer's three (3) page report on the Krebs investigation.
- Item #5: FBI Agent Joseph Schwecke's five (5) page report on the Krebs investigation.

Including all "actual audio and/or video tapes used for the transcriptions and reports" as referenced in the October 3, 2002 City of Boulder Police Department memo.

Plaintiffs' February 19, 2014 letter to Beckner also requested that in the event Plaintiffs' request is denied, they be provided with a written statement of the grounds for the denial, citing the law or regulation under which access is denied, as required by C.R.S. § 24-72-305 (6). A true and correct copy of Plaintiff's February 19, 2014 letter is attached as Exhibit 8.

17. In a letter dated March 4, 2014, but postmarked March 11, 2014, Beckner denied Plaintiffs' request on the ground that "disclosure would be contrary to the public interest." Beckner also cited the Court's September 26, 2002 Order and Ruling in *White v. City of Boulder* as a ground for his denial stating:

The records you seek are among the records delivered to Judge Montgomery for inspection in 2002, under the Colorado Criminal Justice Records Act. After reviewing these investigative records under the act, Judge Montgomery determined the records would not be released to you. We will adhere to the judge's decision for the reasons cited in the judge's ruling.

A true and correct copy of Beckner's March 4, 2014 letter is attached as Exhibit 9.

18. On March 12, 2014, Plaintiffs sent Beckner an e-mail inquiring whether he had erred in his March 4, 2014 letter by citing §24-2-204 (2) (A) (1), C.R.S. rather than §24-72-305 (5), C.R.S. as the basis for his denial. Plaintiffs also requested that if Beckner's intent is to deny our request under §24-72-305 (5), C.R.S., that he specify the general nature of the public interest to be protected by his denial as required by §24-72-305 (6). A true and correct copy of Plaintiff's March 12, 2014 email is attached as Exhibit 10.

19. On March 13, 2014, Beckner sent a letter to Plaintiffs stating that the he had erred in referring to §24-2-204 (2) (A) (1), C.R.S. in his March 4, 2014 letter and that he intended to cite 24-72-305 (5), C.R.S. for his denial. In this letter, Beckner then stated his refusal to inform Plaintiffs as to the general nature of the public interest he intends to protect by his denial of our February 19, 2014 criminal justice records request. A true and correct copy of Beckner's March 13, 2014 letter is attached as Exhibit 11.

WHEREFORE, Plaintiffs, Fleet Russell White, Jr. and Priscilla Brown White, pursuant to §24-72-305 (7), C.R.S., respectfully request that:

- (a) The Court enter an order directing Defendants to show cause why Defendants should not permit the inspection and copying of all criminal justice records described in Plaintiffs' February 19, 2014 letter addressed to Defendant Beckner attached hereto as Exhibit 8.
- (b) The Court conduct a hearing pursuant to such order "at the earliest practical time" as required by §24-72-305 (7), C.R.S., and after such hearing to make the Show Cause Order absolute.

Dated: March 14, 2014.

  
Fleet Russell White, Jr.

  
Priscilla Brown White

# EXHIBIT 1

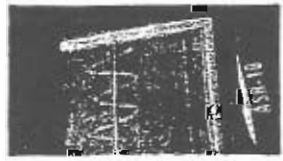
*Fleet Russell White, Jr. & Priscilla Brown White*

v.

*City of Boulder & Mark R. Beckner*

COMPLAINT AND APPLICATION FOR ORDER TO SHOW CAUSE

Barrie Hartman, *DA pursues new Ramsey lead*  
(Boulder) DAILY CAMERA (February 25, 2000)



Boulder County's newspaper

www.thedailycamera.com

# DAILY CAMERA

Friday, February 25, 2000 • 25¢

PAGE 1C



SPORTS:

VAN EXEL LIFTS  
NUGGETS PAST  
ROCKETS, 106-97

## DA pursues new Ramsey lead

### Hunter asks police to investigate woman's story of sex abuse

By Barrie Hartman

Camera Staff Writer  
© 2000 Boulder Publishing Inc.

District Attorney Alex Hunter has turned over new information to Boulder police and the FBI that he says could provide a major breakthrough in solving the 3-year-old Jon Benet Ramsey murder case.

The information is from testimony

by documents provided voluntarily by a 37-year-old California woman who was brought forward by Boulder attorney Lee Hill. The woman said she has suffered a lifetime of sexual and physical abuse, beginning at age 3. Her story, if true, could mean the Ramsey case is tangled in sexual abuse and involves more people than originally thought.

Hunter said he finds the woman to be "very believable." Boulder police detectives, however, aren't so sure.

"Even if only 15 percent of what she says is true," Hunter said, "this case warrants investigation. And if Boulder cops don't want to do it, I will take the case to the U.S. Attorney."

Police Chief Mark Beckner said

Thursday, "Though our detectives did not find her to be credible, we are taking what she said seriously. I'm interested in finding the truth no matter where it leads us."

Beckner said the first thing his detectives will do is perform a thorough background check of the woman and meet with her therapist of 10 years in an attempt to corroborate her story.

#### ON THE WEB

More coverage of Ramsey case.

www.thedailycamera.com

Hill, who is a former San Diego County deputy district attorney and former special assistant U.S.

Please see HUNTER on 7A

## States keeping welfare money

At least six states have

## TEXAS EXECUTION



## Teen: Guilty of careless driving

Plea deal offered after boy gives account of accident — he was



FROM PAGE 1A

# Hunter pursues new lead in Ramsey murder case

Continued from 1A

attorney who is experienced in investigative work, said, "She is among the most credible witnesses I have ever interviewed." He is representing the woman in her decision to give information to authorities.

The woman has described to police years of sexual and physical abuse in California homes at the hands of adults who stayed at holiday and other parties after other guests had left for the evening. Then, she said, another "party," one of sexual abuse for the gratification of a select group of adults, would begin.

In talking to detectives, the woman draws parallels between sexual techniques used at these sessions and the physical evidence of "garroting" that investigators find on the body of JonBenet Ramsey. The woman told detectives she believes JonBenet was killed accidentally when an asphyxiation technique used to stimulate an orgasmic response during a child sex-and porno "party" went too far.

The woman told police she knows firsthand about asphyxiation (choking) to produce a sexual

response because it had been done to her when she was a child. The woman said in her experience little girls were dressed provocatively and trained to say provocative things, such as, "It's a pleasure to please you."

She told police that when girls did not perform as expected, they were struck on the head. That was because their hair covered the wound. A big night for such "parties" was Christmas night, she said. Over the years, she said, many parties were held then because a large number of cars around a house did not arouse suspicion in the neighborhood and the children had a full week to heal from their wounds before returning to school.

JonBenet Ramsey's death occurred overnight Christmas 1996. The autopsy report concluded she suffered a blow on the head and was strangled.

The woman said she knows the Ramseys through the Fleet White family. She said the godfather to her mother is Fleet White Sr., 86, of California. Fleet White Jr., of Boulder and John Ramsey were close friends until the death of JonBenet.

White Jr. was with John Ramsey when JonBenet's body was found in the basement of the Ramsey's Boulder home. White Jr. has since been crusading for Hunter's ouster from this case for refusing to prosecute the Ramseys.

Ramsey's attorney, Bryan Morgan, declined comment. Fleet White could not be reached Thursday.

Police cleared White as a suspect in April 1997.

Attorney Hill said the woman came forward because she was fearful for her life. She came to believe that people involved in child sexual abuse in California were becoming suspicious that she might try to talk to authorities. Hill said her main reason, however, was to try to save "other innocent victims who can't speak for themselves" from further sexual abuse.

The woman and her therapist of 10 years, Mary Bienkowski, saw Hill being interviewed on Fox television about a deposition he had taken of John Ramsey in a libel suit against a supermarket tabloid. They decided to contact him. The camera's efforts to reach Bienkowski have been unsuccessful.

Hill, struck by what he heard,

traveled to San Luis Obispo near Los Angeles on Feb. 11. He spent five hours interviewing both the woman and her therapist, and he videotaped supporting documents, which included personal notes, cards and family photographs that the woman says are from the Whites, both senior and junior.

Hill recounted details of the interview to Hunter in a meeting Feb. 16. With him was Stephen Singalar, a Denver author who has pursued the Ramsey case for three years and is convinced the killing is linked to child sexual abuse. Both men expressed to Hunter intense frustration about the reluctance of police to consider evidence that deviated from their theories.

The woman called Hill again Saturday, and he arranged for her to fly to Denver. He picked her up at 12:30 a.m. Sunday at Denver International Airport and found safe housing for her.

Hunter immediately tried to arrange for detectives to interview the woman. Two detectives interviewed her at 3 p.m. Tuesday for nearly five hours.

It was during that interview that Hill learned Boulder police had received a missing person's report

on the woman. A relative of the woman filed the report with San Luis Obispo authorities, who called Boulder police. Boulder police, Hill said, responded that she was in Boulder and would be interviewed by detectives at 3 p.m. Tuesday. They also told San Luis Obispo police she was with Lee Hill.

"I couldn't believe it," Hill said. "We had told police her life was in danger, then they tell everyone where she is and what she is doing."

Police Chief Becker said he thought it was his department's responsibility to respond to the missing person's report. Hill says police should have asked the witness whether she wanted them to respond.

The Ramsey case has been quiet for the last several months, following a 13-month grand jury investigation that prosecutors said did not find enough evidence to bring an indictment in the case.

Contact Barrie Hartman at (303) 473-1390 or hartmanb@thedailycamera.com.

## Editor's note

Barrie Hartman is editor of the Daily Camera's opinion pages, and his writing does not normally appear in the news columns. In this case, the main sources of the above story stepped forward to give their information to Hartman in lengthy interviews.

The woman quoted in the article, whom Boulder County District Attorney Alex Hunter believes possesses credible information regarding the JonBenet Ramsey case, has been interviewed by the Camera and the Boulder Police.

She and her therapist then contacted Boulder attorney Lee Hill who put her in touch with Hartman and the district attorney.

Camera disclosed the content of that deposition in a news article published Feb. 6.

## Brazilian pleads guilty to driving charge

Continued from 1A

serve probation under supervision in Brazil.

tried to park a Chevrolet Suburban

was driving to McDonald's, Edwall said. In fact, he said, the boy was told to bring back food for several

Your best friend

# EXHIBIT 2

*Fleet Russell White, Jr. & Priscilla Brown White*

v.

*City of Boulder & Mark R. Beckner*

COMPLAINT AND APPLICATION FOR ORDER TO SHOW CAUSE

City of Boulder News Release, *Boulder Police end investigation into California woman's report*  
(May 15, 2000)

# News Release

May 15, 2000

Contact: Jana Petersen, Media Relations, (303) 441-3090

City's Home Page [www.ci.boulder.co.us](http://www.ci.boulder.co.us)

City of Boulder



## Boulder Police end investigation into California woman's report

Boulder Police and prosecutors have concluded an investigation that began in February when a 37-year-old California woman reported her belief that JonBenet Ramsey was murdered as part of a child sex ring. The investigation found no additional evidence to support this theory.

In February, the woman contacted the Boulder Daily Camera with allegations of a child sex abuse conspiracy involving her own family members, the Ramsey family and close friends of the Ramseys. The woman also claimed that some of her own family members were at a party attended by JonBenet Ramsey and her parents on December 25, 1996, just prior to JonBenet's death. The woman believed JonBenet was likely killed at the party by adults who sexually and physically abused her.

Boulder Police spent about 11 weeks investigating the allegations, which included conducting 22 interviews, reviewing medical and psychological records, reviewing photographs and recordings, consulting with a forensic psychiatrist, and comparing the allegations against physical evidence and current knowledge of the case. As a result, Boulder Police and prosecutors working on the case have concluded that other than the woman's statements, there is no evidence to support this theory of JonBenet's murder.

"The Boulder Police have spent a significant amount of time investigating the claims made by this woman and her attorney," Prosecutor Mike Kane said. "There is simply no credible evidence to link anything she alleges to the death of JonBenet. The expenditure of additional police and prosecutorial resources is unwarranted."

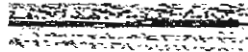
Boulder Police have made no judgments or conclusions about abuse the woman may have suffered in prior years in California. It is well established that she was a victim of sexual abuse in 1979-80, for which a suspect was arrested and convicted. However, current investigation did not find any connection between the abuse she suffered and the death of JonBenet Ramsey.

Boulder Police have forwarded information to the FBI in reference to some of the woman's allegations regarding the operation of a child sex ring. Police also advised her to contact California authorities with any information she has regarding crimes that may have occurred in California.

This is the second time Boulder Police have investigated the possibility of JonBenet's death being connected to a "sex ring" or pornographic operation involving numerous people. On each occasion, no credible evidence was found to support such speculation.

"We needed to take the time to complete a thorough investigation," Police Chief Mark Beckner said. "Unfortunately, the allegations have led to speculation that Fleet and Priscilla White, former close friends of the Ramseys and hosts of the 1996 Christmas party, were somehow involved in the sexual abuse and death of JonBenet. We have no evidence whatsoever to support this and have never had evidence to support such an allegation. Nor do we have any evidence that John and Patsy Ramsey were part of or participated in a child sex ring operation."

Because she is a sexual assault victim, Boulder Police are not releasing the name of the California woman.



# EXHIBIT 3

*Fleet Russell White, Jr. & Priscilla Brown White*

v.

*City of Boulder & Mark R. Beckner*

COMPLAINT AND APPLICATION FOR ORDER TO SHOW CAUSE

Ruling and Order dated September 26, 2002

*White v. City of Boulder,*

DISTRICT COURT, BOULDER COUNTY, COLORADO

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FLEET R. WHITE and PRISCILLA BROWN WHITE  
Plaintiffs,

vs.

THE CITY OF BOULDER, COLORADO and MARK C. BECKNER, individually and  
in his capacity as Chief of the Boulder Department of Police and Custodian of Records  
for the Department of Police  
Respondents.

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**RULING AND ORDER**

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This matter is before the Court on Petitioners' request that Respondents City of Boulder and Mark Beckner show cause why certain criminal justice records were not made available to Petitioners to inspect and copy. After hearing and after reviewing all of the pleadings and the applicable law the Court finds as follows:

Petitioners requested access to the criminal justice records relating to allegations made by Ms. Nancy Jo Krebs in 2000. The custodian of those records, Boulder Police Chief Mark Beckner, denied their request. In a letter to Petitioners dated April 2, 2002 he said "I must deny your request to copy and inspect these materials. As you know the JonBenet Ramsey homicide is still under investigation. Pursuant to C.R.S. 24-72-305(5), these materials are investigative files and are therefore not subject to disclosure under the criminal justice records statute." Exhibit 4 attached to Petitioner's Application for Order to Show Cause.

Petitioners then brought this action pursuant to C.R.S. 24-72-305(7) which says in part

Any person denied access to inspect any criminal justice record covered by this Part 3 may apply to the district wherein the record is found for an order directing the custodian of such record to show cause why said custodian should not permit the inspection of such record.

JonBenet Ramsey was murdered six years ago this coming December. This criminal case, according to the testimony of Chief Beckner, remains an open, active case. It has not been "cleared;" it has not been placed on an inactive status. The criminal justice records – the investigative files – pertaining to this case encompass approximately forty thousand pages and fifteen hundred pieces of evidence including rolls of film. Approximately six hundred witness interviews are contained in the files.

In any criminal investigation, the Chief explained, the police want to be very careful and thoughtful about what is released. Release of certain information can harm

the ongoing investigation, or can harm the ultimate prosecution down the road, or can chill other witnesses coming forward.

The improvident release of information may cause other witnesses to fear their information or tips will be spread across the front pages of newspapers. They may hesitate to come forward with valid information out of concern their identities will be disclosed thereby putting them at jeopardy, usually from the perpetrator.

Public disclosure of the questions police ask of witnesses – or the questions the police don't ask for that matter – may well harm an ongoing investigation by showing just how much the police do or do not know.

In the JonBenet Ramsey case in particular, Chief Beckner seeks to hold the line against piecemeal disclosure of the investigative file. The investigators' abilities to separate fact from fiction in this case depends on their knowledge and evaluation of the investigation as a whole.

There have been a number of people who, over the course of this investigation, have sought discovery of the Ramsey homicide files for purported civil discovery in one case or another. Chief Beckner has to date denied all such requests.

The Petitioners, Mr. and Mrs. White, were with the Ramsey family and were witnesses in the investigation from the first day of its existence.

The case exploded into a media frenzy and the White family was indeed on the front page of local, national, international and supermarket tabloid publications. They were the subject of Internet chatrooms, television news reports and radio talk shows. They were subjected to the very kinds of scrutiny and disclosure that Chief Beckner seeks to protect witnesses from.

No doubt because Petitioners were involved in the case from the beginning, a number of tips making accusations against them came to the police. Chief Beckner testified that Petitioners have never asked for the reports pertaining to those allegations against them.

He further testified that Petitioners have never asked him or his department to issue statements clearing them.

The only criminal justice records that Petitioners do seek are those relating to the allegations of Ms. Krebs made in February of 2000, more than three years into the case. These allegations included accusations that Petitioner Fleet White and his elderly father had ritualistically, physically and sexually abused children including Ms. Krebs and had engaged in child pornography activities. These claims were endorsed as credible by the then District Attorney Alex Hunter and they were published to the community in which the Petitioners' family resides as the main headlined story on page one of the local paper, the Boulder Daily Camera. Exhibit C to Petitioner's Memorandum Brief. Television and

radio discussions of Ms. Krebs' allegations inevitably followed. Exhibits D,E,F,G,H,I to Petitioner's Memorandum Brief.

Meanwhile, the Boulder Police were charged with investigating the allegations by the District Attorney. They did so.

Chief Beckner testified that Ms. Krebs' allegations are no longer being pursued and that it is no longer necessary to devote any resources to this lead. He acknowledged that the police feel a responsibility to protect their witnesses – especially from incredible allegations.

He identified and read from a number of Respondent City of Boulder press releases. They include a press release dated May 15, 2000 which says

Boulder Police and prosecutors have concluded an investigation that began in February when a 37 year old California woman reported her belief that JonBenet Ramsey was murdered as part of a child sex ring. The investigation found no additional evidence to support this theory....Boulder Police and prosecutors working on the case have concluded that other than the woman's statements, there is no evidence to support this theory of JonBenet's murder. "The Boulder Police have spent a significant amount of time investigating the claims made by this woman and her attorney," Prosecutor Mike Kane said. "There is simply no credible evidence to link anything she alleges to the death of JonBenet. The expenditure of additional police and prosecutorial resources is unwarranted." Exhibit A to Petitioner's Memorandum Brief.

The portion of the Ramsey homicide case that pertains to the now concluded Krebs investigation consists of about forty pages of documents, video and audio tapes and photos. It includes medical information and the identities of witnesses who have never otherwise been disclosed according to Chief Beckner.

The Court notes that the current District Attorney, in response to a similar request from the Petitioners, has determined that "under the unique circumstances involved here, we have concluded that it is appropriate to provide you with the attached redacted copies of reports and notes on the particular investigation of concern to you." Letter of Assistant District Attorney William F. Nagel to Petitioners dated May 13, 2002. Exhibit T to Petitioner's Memorandum Brief.

In light of these facts the Court makes the following conclusions of law:

This matter is properly before this Court pursuant to C.R.S. 24-72-305(7). *Prestash v. City of Leadville*, 715 P.2d 1272 (Colo. App. 1985).

Chief Beckner and the City's denial of inspection was not arbitrary or capricious. Respondents have a legitimate interest in preventing disclosure of investigatory files of any open case. It is in the public interest that disclosure of police investigations be limited for all of the reasons Chief Beckner testified to.



This Court appreciates the department's need for a hard line against disclosure particularly in the extraordinary circumstances of the Ramsey investigation.

The Court finds that Petitioners along with many others have been the subject of allegations and tips to the police and have been investigated as part of the ongoing and still-open Ramsey investigation. Petitioners do not seek access to these records and the Court finds it is contrary to the public interest that those records be disclosed.

The Court further finds however that Petitioners have a compelling and legitimate interest in obtaining the records of Ms. Krebs's allegations which so impacted their family.

Ms. Krebs's allegations have been thoroughly investigated and that particular criminal investigation is indeed concluded. It is a discrete, separate piece of a huge and ongoing case. It may be years -- it may even be decades -- before the underlying homicide investigation is successfully cleared and prosecuted. Essentially the Respondents' position is that Petitioners should be prevented from viewing the sought-after records for an unknowable period of time. This Court is not persuaded that the public's interest would be served in any fashion by preventing these people access to the now-discredited accusations which had been leveled against them in such an extraordinarily public way.

The Court does find an ongoing public interest in protecting the integrity of the underlying investigation however, and based on Chief Beckner's testimony, finds that some of the police interviews in the Krebs matter may harm the ongoing investigation by showing just how much the police do or do not know or by disclosing otherwise unknown witnesses.

The Court therefore orders Respondents to deliver to the Court under seal copies of the documents and evidence pertaining to the Krebs allegations and subsequent investigation for an *in camera* review. Based on that review the Court will determine what, if any, part of the file may be released to Petitioners.

Nothing will be released until Respondents have been notified of the decision of the Court following its review, and have been given an opportunity to further respond.

So Ordered

26 SEPT 2002

  
Lael Montgomery  
District Court Judge

# EXHIBIT 4

*Fleet Russell White, Jr. & Priscilla Brown White*

v.

*City of Boulder & Mark R. Beckner*

COMPLAINT AND APPLICATION FOR ORDER TO SHOW CAUSE

City of Boulder Police Department, Memorandum  
(October 3, 2002)



City  
of  
Boulder  
Police Department

1805 33<sup>RD</sup> STREET • BOULDER, COLORADO 80301 • (303) 441-3300 • FAX (303) 441-4330

MEMORANDUM

TO: Boulder District Court Judge Lael Montgomery  
FROM: Detective Sergeant Kurt Weiler  
SUBJECT: Nancy Krebs Investigation  
DATE: October 3, 2002

In response to your Order dated September 26<sup>th</sup>, 2002, the following seven items are being presented for your review:

- 1) One video tape with images of Lee Hill and Nancy Krebs
- 2) Fourteen (14) photographs related to the Krebs Investigation, camera malfunction on all photos
- 3) Detective Tom Trujillo's fifty-five (55) page report & twenty (20) page Appendices of Krebs investigation
- 4) Detective Jane Harmer's three (3) page report on the Krebs investigation
- 5) FBI Agent Joseph Schwecke's five (5) page report on the Krebs investigation
- 6) One hundred eighty-eight (188) page transcription of Krebs 2/22/2000 interview
- 7) Ninety-seven (97) page transcription of Krebs 5/10/2000 interview

These items are copies made from the Boulder Police Department Case File in this matter. Copies of the actual audio and/or video tapes used for the transcriptions and reports are available upon the Court's request.

Received By:

*Charles H. Hensley*

Date:

10/3/02

# EXHIBIT 5

*Fleet Russell White, Jr. & Priscilla Brown White*

v.

*City of Boulder & Mark R. Beckner*

COMPLAINT AND APPLICATION FOR ORDER TO SHOW CAUSE

Ruling and Order dated November 3, 2002

*White v. City of Boulder*, Boulder District Court

DISTRICT COURT, BOULDER COUNTY, COLORADO

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FLEET R. WHITE and PRISCILLA BROWN WHITE  
Plaintiffs,

vs.

THE CITY OF BOULDER, COLORADO and MARK C. BECKNER, individually and  
in his capacity as Chief of the Boulder Department of Police and Custodian of Records  
for the Department of Police  
Respondents.

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ORDER

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Upon review of the Boulder Police Department's records that pertain to Ms. Krebs' allegations against Petitioners and their family, and considering those factors described in the Court's original ruling in this case, the Court determines that a portion of the police file should be released. The transcripts of Ms. Krebs' two interviews with the police and Detective Trujillo's summary of her interview will be released with some redactions.

This Order is stayed until 11 November 2002.

Done this 3 November 2002

BY THE COURT

  
Lael Montgomery  
District Court Judge

**E-FILED**  
NOV - 4 2002

# EXHIBIT 6

*Fleet Russell White, Jr. & Priscilla Brown White*

v.

*City of Boulder & Mark R. Beckner*

COMPLAINT AND APPLICATION FOR ORDER TO SHOW CAUSE

Letter from Fleet Russell White, Jr. and Priscilla Brown White  
To Mark Beckner, Chief of Police, Boulder Police Department  
(October 3, 2011)

Fleet Russell White, Jr. and Priscilla Brown White

October 3, 2011

Mark Beckner  
Chief of Police  
Boulder Police Department  
1805 33<sup>rd</sup> Street  
Boulder, Colorado 80301

Dear Mr. Beckner,

The undersigned hereby request that the following records in the possession of the Boulder Police Department be made available to us for inspection and copying pursuant to applicable Colorado statutes.

1. All records including but not limited to meeting notes, memoranda, communications and correspondence, whether written or electronic, that came into existence at any time during 1997 until this date that refer or in any way relate to meetings, conversations and interactions between Stephen Singular and former Boulder District Attorney Alex Hunter. The undersigned believe that throughout that period of time Mr. Singular has been a book author and a resident of Colorado. Mr. Singular's book *Presumed Guilty; An Investigation into the JonBenet Ramsey Case, the Media & the Culture of Pornography* was published in 1999. (ISBN-10 1893224007)
2. All records including but not limited to meeting notes, memoranda, communications and correspondence, whether written or electronic, that came into existence at any time during 1997 until this date that refer or in any way relate to meetings, conversations and interactions between Stephen Singular and former Boulder City Attorney Joseph N. de Raismes.
3. All records including but not limited to meeting notes, memoranda, communications and correspondence, whether written or electronic, that came into existence at any time during 1997 until this date that refer or in any way relate to discussions, deliberations or decisions to limit, reduce or prohibit the involvement of Mr. de Raismes in any matter relating to the Boulder Police investigation of the 1996 JonBenet Ramsey homicide.
4. All records including but not limited to meeting notes, memoranda, communications and correspondence, whether written or electronic, that came into existence at any time during 1997 until this date that refer or in any way relate to discussions, deliberations or decisions involving the City of Boulder's 1997 engagement of private attorneys Richard Baer, Robert Miller and Daniel Hoffman to provide legal counsel to the City of Boulder in relation to the Boulder Police investigation of the 1996 JonBenet Ramsey homicide .

Mark Beckner  
October 3, 2011  
Page Two

5. All records including but not limited to meeting notes, memoranda, communications and correspondence, whether written or electronic, that came into existence at any time during 1997 until this date that refer or in any way relate to the undersigned or any member of our respective families in connection with claims and allegations of Nancy Jo Krebs or Nancy Krebs and the investigation thereof by local, state or federal law enforcement agencies, including the Boulder Police Department.

6. All records including but not limited to meeting notes, memoranda, communications and correspondence, whether written or electronic, that refer or in any way relate to the City of Boulder News Release dated May 15, 2000, titled "Boulder Police end investigation into California woman's report." A copy of that news release is attached hereto.

7. All those records identified and described in the October 3, 2002 City of Boulder Police Department memorandum that is attached hereto, as follows:

Item #1: One video tape with images of Lee Hill and Nancy Krebs.

Item #2: Fourteen (14) photographs related to the Krebs investigation.

Item #3: Detective Tom Trujillo's fifty-five (55) page report and twenty (20) page Appendices of Krebs investigation.

Item #4: Detective Jane Harmer's three (3) page report on the Krebs investigation.

Item#5: FBI Agent Joseph Schwecke's five (5) page report on the Krebs investigation.

This request does not include those records previously released by order of the Boulder District Court in *White vs. The City of Boulder*,

1. Transcription of February 22, 2000 interview of Nancy Krebs by the Boulder Police Department. (188 pages)

2. Transcription of May 10, 2000 interview of Nancy Krebs by the Boulder Police Department. (97 pages)

3. Boulder Police Department Detective Division Supplemental Report captioned "P 96-21871" dated April 5, 2000 prepared by Detective Thomas Trujillo. (9 pages)

If you have questions or require clarification regarding this request, please contact us using the information given above.

Thank you,



Mark Beckner  
October 3, 2011  
Page Three



Fleet Russell White, Jr.



Priscilla Brown White

Enclosure:     City of Boulder News Release dated May 15, 2000  
                     Boulder Police Department memorandum dated October 3, 2002

# EXHIBIT 7

*Fleet Russell White, Jr. & Priscilla Brown White*

v.

*City of Boulder & Mark R. Beckner*

COMPLAINT AND APPLICATION FOR ORDER TO SHOW CAUSE

Letter from Mark Beckner, Chief of Police, Boulder Police Department  
To Fleet Russell White, Jr. and Priscilla Brown White  
(October 17, 2011)



**CITY  
OF  
BOULDER**

DEPARTMENT OF POLICE

Mark R. Beckner  
Chief of Police

October 17, 2011

Fleet & Priscilla White

Dear Mr. & Mrs. White:

I received your October 3, 2011 letter requesting that certain records in the possession of the Boulder Police Department be "made available to you for inspection and copying pursuant to the applicable Colorado statutes." You requested "all records including but not limited to meeting notes, memoranda, communications and correspondence, whether written or electronic, that came into existence at any time during 1997 until 10/3/11" concerning:

1. Meetings, conversations and interactions between Stephen Singular and Boulder District Attorney Alex Hunter.

The Boulder Police Department has been unable to locate any records pertaining to this matter in BPD files or records.

2. Meetings, conversations and interactions between Stephen Singular and former Boulder City Attorney Joseph N. De Raismes.

The Boulder Police Department has been unable to locate any records pertaining to this matter in BPD files or records.

3. Discussions, deliberations or decisions to limit, reduce or prohibit the involvement of Mr. De Raismes in any manner to the Boulder Police investigation of the 1996 JonBenet Ramsey homicide.

The Boulder Police Department has been unable to locate any records pertaining to this matter in BPD files or records.

4. Discussions, deliberations or decisions involving the City of Boulder's 1997 engagement of private attorneys Richard Baer, Robert Miller and Dan Hoffman to provide legal counsel to the City of Boulder in relation to the Boulder Police Department investigation of the 1996 JonBenet Ramsey homicide.

The Boulder Police Department has been unable to locate any records pertaining to this matter in BPD files or records.

5. That refer or in any way relate to the White family in connection with the claims and allegations of Nancy Jo Krebs and the investigation thereof by local, state, or federal law enforcement agencies, including the Boulder Police Department.

Your request for this material is denied. These are not records of "official action" as defined in C.R.S. 24-72-302 (7). They are non-disclosable "criminal justice investigative files" pursuant to C.R.S. 24-72-305 (5). There are third party privacy interests that will be impacted by the disclosure of this information. Additionally, disclosure of this information may compromise a pending BPD criminal investigation.

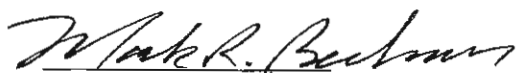
6. That refer or in any way relate to the City of Boulder News Release dated 5/15/00, titled "Boulder Police end investigation into California woman's report."

Your request for this material is denied. These are not records of "official action" as defined in C.R.S. 24-72-302 (7). They are non-disclosable "criminal justice investigative files" pursuant to C.R.S. 24-72-305 (5). There are third party privacy interests that will be impacted by the disclosure of this information. Additionally, disclosure of this information may compromise a pending BPD criminal investigation.

7. All those records identified and described in Detective Sergeant Kurt Weiler's 10/3/02 Memorandum to Boulder District Court Judge Lael Montgomery concerning the Nancy Krebs investigation:

- 1) One video tape with images of Lee Hill and Nancy Krebs.
- 2) Fourteen photos related to the Krebs investigation.
- 3) Detective Tom Trujillo's 55 page report and 20 page Appendix of Krebs's investigation.
- 4) Detective Jane Harmer's 3 page report on the Krebs investigation.
- 5) FBI Agent Joseph Schwecke's 5 page report on the Krebs investigation.

Your request for this material is denied. These are not records of "official action" as defined in C.R.S. 24-72-302 (7). They are non-disclosable "criminal justice investigative files" pursuant to C.R.S. 24-72-305 (5). There are third party privacy interests that will be impacted by the disclosure of this information. Additionally, disclosure of this information may compromise a pending BPD criminal investigation.



MARK R. BECKNER  
Chief Of Police  
Boulder Police Department

# EXHIBIT 8

*Fleet Russell White, Jr. & Priscilla Brown White*

v.

*City of Boulder & Mark R. Beckner*

COMPLAINT AND APPLICATION FOR ORDER TO SHOW CAUSE

Letter from Fleet Russell White, Jr. and Priscilla Brown White  
To Mark Beckner, Chief of Police, Boulder Police Department  
(February 19, 2014)

Fleet Russell White, Jr. and Priscilla Brown White

February 19, 2014

Mark Beckner  
Chief of Police  
Boulder Police Department  
1805 33<sup>rd</sup> Street  
Boulder, Colorado 80301

Dear Mr. Beckner,

Pursuant to C.R.S §24-72-301 et seq, the undersigned hereby request that the following records in the custody or control of the Boulder Police Department be made available to us for inspection and copying:

1. All records including but not limited to meeting notes; memoranda; communications and correspondence; interviews and transcriptions, whether such records are written or electronic, that came into existence at any time during 1997 until this date that refer to, or in any way relate to, the undersigned or any member of our respective families in connection with the claims and allegations of Nancy Krebs, also known as Nancy Jo Krebs, and the investigation thereof by local, state or federal law enforcement agencies, including the Boulder Police Department.

2. All those certain records specified and described in the attached October 3, 2002 City of Boulder Police Department memorandum to the Boulder District Court in *White v. City of Boulder*.

- Item #1: One video tape with images of Lee Hill and Nancy Krebs.
- Item #2: Fourteen (14) photographs related to the Krebs investigation.
- Item #3: Detective Tom Trujillo's fifty-five (55) page report and twenty (20) page Appendices of Krebs investigation.
- Item #4: Detective Jane Harmer's three (3) page report on the Krebs investigation.
- Item #5: FBI Agent Joseph Schwecke's five (5) page report on the Krebs investigation.

Including all "actual audio and/or video tapes used for the transcriptions and reports" as referenced in the October 3, 2002 City of Boulder Police Department memo.

Mark Beckner  
February 19, 2014  
Page Two

If you deny this request, please provide us with a written statement of the grounds for the denial, citing the law or regulation under which access is denied, as required by C.R.S § 24-72-305 (6).

Your prompt response to this request will be appreciated. We can be contacted at the street address, phone or e-mail address provided above.

Thank you,



Fleet Russell White, Jr.



Priscilla Brown White

Enclosure: Boulder Police Department memorandum dated October 3, 2002

# EXHIBIT 9

*Fleet Russell White, Jr. & Priscilla Brown White*

v.

*City of Boulder & Mark R. Beckner*

COMPLAINT AND APPLICATION FOR ORDER TO SHOW CAUSE

Letter from Mark Beckner, Chief of Police, Boulder Police Department  
To Fleet Russell White, Jr. and Priscilla Brown White  
(March 4, 2014)





**CITY  
OF  
BOULDER**

DEPARTMENT OF POLICE

Mark R. Beckner  
Chief of Police

---

March 4, 2014

Fleet Russell White, Jr.  
Priscilla Brown White

Dear Mr. and Ms. White:

RE: Your February 19, 2014 Criminal Justice Records Act Request

I received your request, referenced above, on February 19, 2014 and have consulted with the Boulder City Attorney's Office.

The materials you requested are criminal justice records, subject to the Colorado Criminal Justice Records Act (CCJRA) C.R.S. Title 24, Article 72, Part 3. Under §24-72-304 (1), C.R.S., "criminal justice records, at the discretion of the official custodian, may be open for inspection by any person ..." As the official custodian of these criminal justice records, I am exercising my discretion to withhold them, for the reasons stated below.

The requested records are investigatory files compiled for a law enforcement purpose, which I am withholding, under §24-2-204(2)(A)(I), C.R.S. on the ground that disclosure would be contrary to the public interest. The requested records are also subject to Honorable Lael Montgomery's September 26, 2002 Ruling and Order which states:

The Court therefore orders Respondents [City of Boulder and Mark C. Beckner] to deliver to the Court under seal copies of the documents and evidence pertaining to the Krebs allegations and subsequent investigation for an in camera review. Based on that review the Court will determine what, if any, part of the file may be released to Petitioners [Fleet R. White and Priscilla Brown White].

The records you seek are among the records delivered to Judge Montgomery for inspection in 2002, under the Colorado Criminal Justice Records Act. After reviewing these investigative records under the act, Judge Montgomery determined the records would not be released to you. We will adhere to the judge's decision for the reasons cited in the judge's ruling.



**CITY  
OF  
BOULDER**

DEPARTMENT OF POLICE

Mark R. Beckner  
Chief of Police

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*Page 2 -- White's February 19, 2014 Criminal Justice Records Act Request*

Sincerely,

Mark R. Beckner  
Chief of Police

cc: Patricia Raab, Police Department Records Manager  
Bob Keatley, Boulder Police Department Legal Advisor  
Thomas A. Carr, City Attorney  
Boulder District Attorney's Office  
City of Boulder Central Records  
City Manager's Office of Communications  
Claybourne M. Douglas, Senior Assistant City Attorney

CITY OF BOULDER, COLORADO

DEPARTMENT OF POLICE

1805 33RD STREET

BOULDER, COLORADO 80301



DENVER  
CO 802

11 MAR 2014  
PM 11



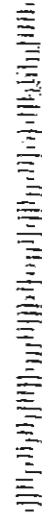
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Fleet Russell White, Jr.  
Priscilla Brown White

ENCLOSURE



# EXHIBIT 10

*Fleet Russell White, Jr. & Priscilla Brown White*

v.

*City of Boulder & Mark R. Beckner*

COMPLAINT AND APPLICATION FOR ORDER TO SHOW CAUSE

e-mail from Fleet and Priscilla White

To Mark Beckner, Chief of Police, Boulder Police Department  
(March 12, 2014)

Subj: **Criminal Justice Records Request: Your March 4, 2014 letter denying access**  
Date: 3/12/2014 4:28:26 P.M. Mountain Daylight Time

March 12, 2014

Mark Beckner  
Chief of Police  
Boulder Police Department  
1805 33<sup>rd</sup> Street  
Boulder, Colorado 80301

Dear Mr. Beckner,

We have received your letter dated March 4, 2014 but postmarked March 11, 2014 denying our February 19 request to inspect and copy criminal justice records.

Your letter states that you are withholding the criminal justice records "under §24-2-204 (2) (A) (1), C.R.S. on the ground that disclosure would be contrary to the public interest." We believe that your reference to §24-2-204 (2) (A) (1), C.R.S. may have been an error and that you intend to withhold the criminal justice records under §24-72-305 (5). Assuming that is the case, we hereby request that you specify the general nature of the public interest to be protected by your denial as required by §24-72-305 (6).

We will appreciate the courtesy of receiving your confirmation regarding the statute under which you intend to withhold the criminal justice records and the general nature of the public interest to be protected by your denial at your earliest convenience.

Thank you.

Fleet and Priscilla White

Thursday, March 13, 2014

# EXHIBIT 11

*Fleet Russell White, Jr. & Priscilla Brown White*

v.

*City of Boulder & Mark R. Beckner*

COMPLAINT AND APPLICATION FOR ORDER TO SHOW CAUSE

Letter from Mark R. Beckner, Chief of Boulder Police  
To Fleet Russell White, Jr. and Priscilla Brown White  
(March 13, 2014)



**CITY  
OF  
BOULDER**

DEPARTMENT OF POLICE

Mark R. Beckner  
Chief of Police

March 13, 2014

Fleet Russell White, Jr.  
Priscilla Brown White

Dear Mr. and Ms. White:

RE: Your February March 12 e-mail message regarding my March 4, 2014 letter denying access to criminal Justice records

I received your message, referenced above, on March 12, 2014 and have consulted with the Boulder City Attorney's Office. You are correct that my March 4 reference to §24-2-204 (2) (A) (1), C.R.S. was an error, and that I intended to cite §24-72-305 (5), C.R.S.

You asked that I explain "the general nature of the public interest to be protected by [my] denial." C.R.S. 24-72-305 (6) states, in pertinent part:

"If the custodian denies access to any criminal justice record, the applicant may request a written statement of the grounds for the denial, which statement shall be provided to the applicant within seventy-two hours, shall cite the law or regulation under which access is denied or the general nature of the public interest to be protected by the denial ... (underlining added)

Under the statute, it is sufficient my statement of grounds for denial need only cite either "the law or regulation under which access is denied or the general nature of the public interest to be protected by the denial." My citation of §24-72-305 (5), C.R.S. is sufficient.

As Judge Montgomery stated in her September 26, 2002 Ruling and Order, "Respondents have a legitimate interest in preventing disclosure of investigatory files of any open case. It is in the public interest that disclosure of police investigations be limited for all of the reasons Chief Beckner testified to." This case is still an unsolved, open case. As I explained on March 4, Judge Montgomery has reviewed, and decided not to release the records you seek. We agree with, and will adhere to Judge Montgomery's decision.

Mark R. Beckner,  
Chief of Police

cc: Patricia Raab, Police Department Records Manager  
Bob Keatley, Boulder Police Department Legal Advisor  
Thomas A. Carr, City Attorney  
Boulder District Attorney's Office  
City of Boulder Central Records  
City Manager's Office of Communications  
Claybourne M. Douglas, Senior Assistant City Attorney