

University Lakes LLC
3796 Nicholson Drive
Baton Rouge, LA 70802
Via U.S. Mail and email to lgreco@lsufoundation.org

July 7, 2026

Re: Public Records Act Request

Dear Ms. Greco,

This letter is a Public Records request on behalf of Our Public Parks, Inc. to University Lakes LLC pursuant the Louisiana Public Records Law, La.R.S.44:1, *et seq.* I am requesting the following categories of documents from January 1, 2015 to the present:

- 1. All contracts between University Lakes LLC and any contractor for construction or work to be performed at the LSU Lakes or lakes owned by others.**
- 2. All bonds or sureties providing any public entity with indemnity for performance of the work and payment of claims provided in No. 1 above. This request should include all sureties as provided by La. Stat. Ann. § 38:2211 et seq.**
- 3. All written procurement policies for construction work.**
- 4. All written procurement policies for selection of architects, engineers, landscape engineers and consultants of any type. This should include any written documents adopted to comply with La. Stat. Ann. § 38:2211.**
- 5. All financial records showing contributions, donations or grants, from the State of Louisiana, The City of Baton Rouge, The Parish of East Baton Rouge or BREC.**

Under the provisions of R.S. 44:32, if you raise a question as to whether the record requested is a public record, you are required to notify in writing the person making the request as to your determination and the reasons, including the legal basis, therefor. Said notice shall be made within five days of the receipt of the request, exclusive of weekends and public holidays. Under the provisions of R.S. 44:33, if the public record is not immediately available you are required to certify this in writing promptly, and in your certificate fix a day and hour within three days, exclusive of weekends and public holidays.

If all or part of the request is denied, please provide the name, address, and telephone number of the agency official responsible for the denial, and the official responsible for the appeals of denied requests. Also, if portions of the requested records are exempt from release, I request that all reasonably segregable, nonexempt portions of those records be released. In addition, if records are withheld, I request that you specifically identify those records by providing a list of records being withheld with an accompanying explanation of the exemptions

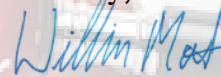
being used to withhold the requested records. This list should include the title and brief description of each of the withheld records, any date or dates associated with each of the withheld records, and a list of attachments, appendices, amendments or other materials included with each of the withheld records.

If your search fails to identify the requested records, I ask that you (1) describe in detail the search procedure, including the information about the files that were searched, (2) identify the person or persons who conducted the search, and (3) explain why a more comprehensive search of your offices would be unreasonable.

Also, if any privilege or exemption is claimed, please provide a privilege log. As you may be aware, any assertion of privilege “must be made individually as to particular documents, and not *in globo* against the entirety of a mass of records.” *Roper v. EBR Parish*, 634,960 (19th JDC, Feb. 4, 2016) at 11, *quoting Skamangas*, 876 So.2d 1017. Thus, “Courts have held that in order to meet this burden, the custodian must state what documents are being withheld, on a document by document basis, and give an explanation, on a document by document basis, as to why each document is not subject to production under the Public Records Law.” *Roper*, at 11.

I am requesting electronic copies of any of the above-referenced documents. Upon identifying the records, please contact me at williammost@gmail.com or at (504)509-5023 to make plans to transmit the records. Thank you for your help and cooperation with this request.

Sincerely,



William Most



CITIZENS FOR A
New Louisiana