

# Lydolph & Weierholt

## ATTORNEYS AT LAW

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Paul Lydolph III, JD, LLM  
Maria Nicolle Beringer, JD, LLM Of Counsel

Erik Weierholt, JD  
Lyle Millham, JD

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(801) 602-8378

Office of the Utah State Auditor  
East Office Building, Suite E310 Utah State Capitol Complex  
Salt Lake City, Utah 84114

November 5, 2013

To Whom It May Concern:

Please find the enclosed GRAMA requests for Adam Ferre and Angie Ferre.

It should be executed properly.

Please return any and all information at your earliest convenience.

Please either invoice or call for payment on any amount required for the records.

Thank you again for your time.

Paul



Paul Lydolph III, Esq.  
J.D., LL.M.  
Managing Partner  
FL Bar # 0188328  
UT Bar # 12584

## GRAMA Request Form

**Note:** Utah Code § 63G-2-204 (GRAMA) requires a person making a records request furnish the governmental entity with a written request containing the requester's name, mailing address, daytime telephone number (if available); and a description of the record requested that identifies the record with reasonable specificity.

### Requester's information

Name: Paul Lydolph III, Esq. USB # 12584 Lydolph & Weierholt

Address: 1211 East Russell Rd.

City/State/zip: Eagle Mountain, UT 84005

Daytime telephone number: (801) 602-8378

### Request made to

Government agency or office: Office of the Utah State Auditor

Address: East Office Building, Suite, E 310, Utah State Capitol Complex

City/State/zip: Salt Lake City, UT 84114

### Records requested

**Note:** The more specific and narrow the request, the easier it will be for an agency or office to respond to the request. If you are unsure about the records' description, contact the agency or office records officer.

**Note:** Government keeps records in "series" or groups of records. To find out what series an agency or office maintains, visit the Archives' website, <http://archives.utah.gov>. The record series retention schedules on the Archives' website include relevant descriptions.

Title or series number of records (if known): Case # In RE: City of Eagle Mountain

Description of records including all relevant information—location of event(s) described in records, city, county, address; date range of the records; names of the person(s); and subject of the request.

FOR ANY AND ALL RECORDS PERTAINING TO ADAM FERRE

The records should include, but not be limited to:

- 1) Any records pertaining directly to Adam Ferre in his official capacity as Eagle Mountain City Energy Department Director or other position.
- 2) Any records pertaining directly to Adam Ferre in a personal capacity.
- 3) Any records pertaining directly to Adam Ferre while representing the City of Eagle Mountain in a personal capacity.
- 3) Any complaint(s), allegation(s) accusation(s) and/or investigation(s) related to and/or involving Adam Ferre.
- 4) Any complaint(s), allegation(s), accusation(s) and/or investigation(s) related to Adam Ferre while acting in his capacity as Eagle Mountain City Energy Department Director or other position.
- 5) Any other record related to Adam Ferre.
- 6) Any other record that potentially or actually implicates Adam Ferre.

Location: Eagle Mountain, UT

Date Range: 1998 to present

Name: Adam Ferre

Subject: Any and all allegations, for the purpose of defending our client in any forum

**Note:** If the record has a restricted access, GRAMA provides that certain individuals may still receive access.

- I am the subject of the record
- I am the authorized representative of the subject of the record
- I provided the information in the record

**Considerations about the desired response**

I would like to:

- View or inspect the records only
- Receive a copy of the records and pay associated fees. Please notify me if the amount will exceed \$ 100
- Receive a copy of the records and request a fee waiver. According to Utah Code § 63G-2-203,
  - Releasing the record primarily benefits the public
  - I am the subject, or authorized representative, of the record
  - My legal rights are directly implicated by the information of the record because \_\_\_\_\_, and I am impecunious
- Receive an expedited response (5 days) because releasing the record benefits the public; I request the information for a story or report for publication or broadcast to the general public

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Description of records including all relevant information—location of event(s) described in records, city, county, address; date range of the records; names of the person(s); and subject of the request.

FOR ANY AND ALL RECORDS PERTAINING TO ANGIE FERRE

The records should include, but not be limited to:

- 1) Any records pertaining directly to Angie Ferre in her official capacity as Eagle Mountain City Special Events Director or other position.
- 2) Any records pertaining directly to Angie Ferre in a personal capacity.
- 3) Any records pertaining directly to Angie Ferre while representing the City of Eagle Mountain in a personal capacity.
- 3) Any complaint(s), allegation(s) accusation(s) and/or investigation(s) related to and/or involving Angie Ferre.
- 4) Any complaint(s), allegation(s), accusation(s) and/or investigation(s) related to Angie Ferre while acting in her capacity as Eagle Mountain City Special Events Director or other position.
- 5) Any other record related to Angie Ferre.
- 6) Any other record that potentially or actually implicates Angie Ferre.

Location: Eagle Mountain, UT

Date Range: 1998 to present

Name: Angie Ferre

Subject: Any and all allegations, for the purpose of defending our client in any forum

**Note:** If the record has a restricted access, GRAMA provides that certain individuals may still receive access.

- I am the subject of the record
- I am the authorized representative of the subject of the record
- I provided the information in the record

**Considerations about the desired response**

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- Receive a copy of the records and pay associated fees. Please notify me if the amount will exceed \$ 100
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- Receive an expedited response (5 days) because releasing the record benefits the public; I request the information for a story or report for publication or broadcast to the general public