



# CITY OF SAN ANTONIO

Office of the City Attorney  
P.O. Box 839966  
San Antonio, TX 78283-3966

January 31, 2019

Ricky J. Poole  
The Law Offices of Ricky J. Poole  
8000 IH-10 West, Suite 600  
San Antonio, Texas 78230

Dear Mr. Poole:

I am responding to your letter dated January 31, 2019 and sent via email at 9:00 am which happened to be the scheduled start time for the City Council meeting in which Erik Walsh was appointed the new City Manager effective March 1, 2019.

I will disregard the invectives and political advocacy peppered throughout your letter and instead focus on addressing the substantive issues.

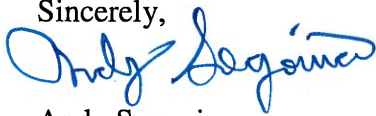
As we have stated over the last five years, the City is also committed to start good faith negotiations with Local 624 on a collective bargaining agreement that is fair to the members and affordable to the taxpayers. The City will accept your invitation to start that process on Wednesday, February 6, 2019 at the Union Hall. We will advise you in advance who will be attending on behalf of the City. This meeting will focus on setting the logistics and ground rules for future negotiation sessions. The logistics will include discussions around meeting times and locations that would afford both of us the best opportunity to prepare for and conduct meaningful discussions. In that vein, we would still like to talk with your team on February 6<sup>th</sup> about the possibility of using a mediator to facilitate productive discussions. We believe the mediated sessions we had in 2017 set a good foundation and framework for moving forward.

We acknowledge that there is a "perception" by the Union that the City is not willing to share information. To the contrary, the City has responded to and closed out 32 Open Records Requests (ORRs) from the Union. In responding to ORRs, we have provided thousands of documents to the Union. Your claim of not providing information was also made during our sessions with the mediator in 2017. At that time we discussed the City responses to ORRs and then responded to requests for information during the mediation sessions in 2017. The mediator was convinced that we had provided more than enough information to negotiate a CBA. To avoid any more baseless accusations and for complete clarity, please send me a list before our February 6 meeting of any ORRs that Local 624 believes have not been closed.

At midnight last night the Union sent yet another ORR covering over 52 specific requests, many for records going back 15 years (Open Record Request No. W249911-013019 attached). It will take multiple staff at least a month to assemble, gather, and review this vast amount of information being requested. Particularly, we will need time to ensure privacy protection of health related information. To enable timely substantive discussions on issues we ask that you prioritize the items in this request so that we can focus on gathering the information essential to developing or evaluating proposals. We are encouraged by the Union's adoption of full transparency going forward. We will shortly be providing our own requests for information from the Union so that we can better understand and evaluate proposals.

We understand the meeting next Wednesday will start the negotiation period under Chapter 174. We sincerely hope that our discussions lead to a CBA that both the City and Local 624 can support.

Sincerely,



Andy Segovia