

1 **VINCE RABAGO, Esq. (State Bar No. 015522)**

2 **VINCE RABAGO LAW OFFICE PLC**

3 500 N. Tucson Blvd., Ste. 100,

4 Tucson, Arizona 85716

(520) 955-9038 (Office)

(888) 371-4011 (Fax)

Vince@VinceRabagoLaw.com

5 Attorney for Appellant Joel Fisher

6 **IN THE OFFICE OF ADMINISTRATIVE HEARINGS**

7 **FOR THE STATE OF ARIZONA**

8 In the Matter of:

9 ADEQ

10 Air Quality Permit No. 55223

11 Rosemont Copper Project

12 Place ID: 135845

Docket No. 13A-A006-DEQ

Docket No. 13A-A007-DEQ

Docket No. 13A-A010-DEQ

**APPELLANT JOEL FISHER'S
RESPONSE TO ADEQ'S MOTION
EXCLUDE TESTIMONY OF
APPELLANT JOEL FISHER'S
SUPPLEMENTAL WITNESSES:
HENRY DARWIN, MARK SHAFFER,
KEVIN KINSALL, TREVOR
BAGGIORE, MICHAEL FULTON,
LINDA TAUNT, MATTHEWBENSON
AND JOE MIKITISH**

17 **APPELLANT FISHER'S RESPONSE TO ADEQ MOTION TO EXCLUDE**

18 ADEQ has filed a Motion in Limine to Exclude eight witnesses listed in Appellant's
19 Notice of Supplemental Witnesses and Exhibits. ADEQ argues that Appellant Fisher has not
20 provided any explanation of these witnesses testimony and has failed to demonstrate that these
21 witnesses are relevant to his appeal issues. ADEQ claims the witnesses do not appear to have
22 relevant evidence, since some do not work for ADEQ, and that Appellant "failed to provide a
23 summary of any of these eight witnesses' testimony and has failed to explain the relevance or
24 admissibility of their testimony to the issues on appeal..." (Motion at 1-2.) However, the
25 witnesses and evidence are relevant to Appellant's appeal of the air quality permit.
26

1 **I. STANDARD OF REVIEW**

2 First, pursuant to A.R.S. § 41-1092.07, “[a]ll relevant evidence is admissible, but the
3 administrative law judge may exclude evidence if its probative value is outweighed by the
4 danger of unfair prejudice, by confusion of the issues or by considerations of undue delay,
5 waste of time or needless presentation of cumulative evidence.” (emphasis added.) With
6 respect to administrative matters, Administrative Law Judges:

7 “in administrative proceedings have considerably more leeway in deciding what
8 evidence to admit because they are permitted to consider all relevant evidence.” A.R.S.
9 § 41-1062(A) (2004); *State Div. of Fin. v. Indus. Comm'n of Ariz.*, 159 Ariz. 553, 556,
10 769 P.2d 461, 464 (App.1989).

11 *Henricks v. Arizona Dept. Of Economic Sec.*, 270 P. 3d 874, ¶ 21 (App. 2012).

12 The relevant Arizona Administrative Code provision provides the following concerning
13 the Rights and Responsibilities of Parties: “Rights and Responsibilities of Parties: A. A party
14 may present testimony and documentary evidence and argument with respect to the issues and
15 may examine and cross-examine witnesses.” Ariz. Admin. Code, R2-19-115.

16 A.R.S. § 41-1092(F)(1) also provides an expansive view of the admission of evidence:

17 A hearing may be conducted in an informal manner and without adherence to the rules
18 of evidence required in judicial proceedings. Neither the manner of conducting the
19 hearing nor the failure to adhere to the rules of evidence required in judicial
20 proceedings is grounds for reversing any administrative decision or order if the
evidence supporting the decision or order is substantial, reliable and probative.

21 Generally speaking, subsequent appellate review “will consider whether the agency's
22 decision was illegal, arbitrary, capricious, or involved an abuse of discretion.” *State ex rel.*
23 *Winkleman v. Nav. Stream Adj.*, 229 P.3d 242, 250, ¶ 13 (App. 2010); *Koepnick v. Ariz. State*
24 *Land Dep't*, 221 Ariz. 370, 374, ¶ 7, 212 P.3d 62, 66 (App.2009) (citing A.R.S. § 12-910(E));
25 *Callen v. Rogers*, 216 Ariz. 499, 502, ¶ 9, 168 P.3d 907, 910 (App.2007); *Eaton v. Ariz. Health*
26 *Care Cost Containment Sys.*, 206 Ariz. 430, 432, ¶ 7, 79 P.3d 1044, 1046 (App.2003).

1 **II. APPELLANT FISHER PREVIOUSLY EXPLAINED THE RELEVANCE OF**
2 **THE LISTED WITNESSES IN APPELLANT'S PREHEARING BRIEF AND IT**
3 **WAS ALSO SELF-EXPLANATORY IN THE NOTICE OF SUPPLEMENTAL**
4 **WITNESSES AND EXHIBITS, CONCERNING IMPROPERLY WITHHELD**
5 **ADEQ RECORDS OF APPARENT POLITICAL INVOLVEMENT IN THE**
6 **AGENCY DELIBERATIVE PROCESS, OSTENSIBLY ALLOWING POLITICS,**
7 **NOT PUBLIC HEALTH, TO IMPACT AGENCY ISSUANCE OF THE PERMIT**

8 In this appeal, Appellant contends the Agency's issuance of the Air Quality Permit was
9 unreasonable, arbitrary, capricious, and invalid. Appellant has raised critical evidentiary and
10 scientific problems that are quite significant in scope. The context as to how and why a state
11 environmental Agency tasked with protecting the public could end up being so off base about
12 certain basic, fundamental scientific evidentiary methods and evaluations is significant, and
13 cannot be understated. These questions are directly relevant to the unreasonable, arbitrary and
14 capricious Agency decision to issue such a permit.

15 The evidence provided to Appellant by the Agency on May 23, 2013 give direct insight
16 about the process that was not previously available in the public domain. This evidence is
17 relevant to the unreasonable and arbitrary nature of the Agency's decision for various reasons.

18 First, the newly-provided evidence suggests political involvement and ostensible
19 political interference by the Governor's office in apparent connection with the Agency's
20 deliberations concerning the Rosemont Copper mine project. Indeed, the Agency itself refused
21 to release records that included emails including staff from the Governor's office on the basis
22 that such records were exempt from release as public records because the records were part of
23 the "deliberative process." (Exhibit A, attached privilege log from ADEQ and related letter.)

24 Indeed, documents withheld by ADEQ specifically refer to a deliberative process with
25 the Governor's office on jurisdiction issues, potential considerations for asserting jurisdiction,
26 drafting of press releases, a briefing memo, and discussion about news articles. The withheld
documents range in date since December 2, 2011 through August 8, 2012. (Exhibit A.)

1 Similarly, various emails and records provided by ADEQ suggest that, in considering
2 the Air Quality Permit, the Agency's actions were arguably concerned or overshadowed by
3 non-legal non-environmental issues, including the public image of the Agency, and perhaps
4 even the speed of issuing a permit, not matters related to protecting the public health under
5 Arizona or Federal law. (Appellant Fisher's PreHearing Brief, at pages 26, lines 10-13;
6 referring to the disclosed records [these supplemental exhibits were filed with the Court; see
7 generally, supplemental electronic exhibits JLF 71 - JLF 75].)

8
9 To the extent ADEQ claims Appellant did not provide a “summary” of the testimony in
10 the Notice pursuant to Case Management Order 6, it was self-evident from Appellant Fisher's
11 Notice of Supplemental Witnesses and Exhibits, filed June 24, 2013, that the list of
12 supplemental witnesses was tied directly to the supplemental additional documents identified.

13 In Appellant's view, this was self-explanatory because the witnesses were directly listed
14 in the supplemental documents identified, and they were mentioned as receiving or sending the
15 34 documents identified by Appellant that ADEQ still refuses to release. (Fisher's Notice of
16 Supplemental Witnesses and Exhibits, filed June 24, 2013, at pages 2 through 5.)

17
18 Appellant apologizes to the Court if the connection between the witnesses and the
19 withheld documents was not adequately amplified in this context in terms of any required
20 summary of their testimony. However, the fact is that ADEQ has withheld these documents
21 from the public and the parties, so the inability of Appellant Fisher to provide a summary of
22 their testimony is the direct result of the Agency improperly withholding public records on
23 invalid bases that do not exist under Arizona law. So, any inability to provide much further
24 detail about their expected testimony is actually caused by the Agency hiding these records.

25
26 In any event, that the witnesses related to the withheld emails with the same names was
apparent and both their intended testimony and relevancy was further made clear in the Notice

1 and elaborated upon in the subsequently filed Pre-Hearing Brief submitted by Appellant Fisher.

2 In the Notice, to the extent Appellant cited as supplemental documents approximately thirty

3 four (34) documents withheld by ADEQ, Appellant elaborated that he intended to call:

4 “Any witness ... or necessitated as rebuttal witnesses, or as a result of information
5 or evidence provided by other parties or the documents improperly withheld by
ADEQ based on non-existent exceptions to Arizona public records law.”

6 (See Fisher's Notice of Supplemental Witnesses and Exhibits, at p. 2, lines 3-5, filed 6/24/13.)

7
8 Thereafter, Appellant provided further explanation in the preceding text of listing
9 various documents as follows:

10 **Documents in ADEQ's and the Governor's office's possession (identified in their**
11 **privilege log mailed to the parties on May 22, 2012), and not possessed by**
12 **Appellant Fisher, including but not limited to the following: any documents**
13 **withheld by ADEQ or their counsel based on the non-existent “deliberative**
process or best interest of the State” public records exception, as such privileges
do not exist under Arizona law and the following documents have been improperly
concealed and withheld.

14 (Appellant's Notice of Supplemental Witnesses and Exhibits, at p. 2, lines 7-13, filed 6/24/13.)

15
16 Thereafter, in Appellant Fisher's Pre-Hearing Brief, Appellant discussed in detail the
17 significant scientific and other failings underlying the issuance of the permit, but also explained
18 that the “Agency's issuance of the permit was unreasonable, arbitrary, and/or capricious, and
19 was also based on invalid technical conclusions, as well as matters not otherwise permitted by

20 Arizona or Federal law.” (PreHearing Brief at p. 5.)

21 Appellant Fisher explained that

22 ... information provided during this appeal, including evidence improperly withheld by
23 ADEQ provides proof that political involvement or pressure may have played a role in
24 the above unreasonable or arbitrary decisions, and the evidence provided by ADEQ
25 further shows that considerations having nothing to do with public health arguably
impacted the agency in relation to its work and issuance of the permit.

26 (Appellant Fisher's PreHearing Brief, at page 1.)

1 Appellant Fisher specifically elaborated on the relevance of such witnesses' testimony
2 as follows:

3 ADEQ has improperly withheld numerous email communications between
4 Agency employees and the Governor's employee on the basis, among other things, that
5 such material was subject to concealment from the public as a deliberative process.
6 Simply put, there is no such deliberative process public records exemption under
7 Arizona law. *See Rigel Corp. v. State of Arizona*, 234 P.3d 633, 640, at para. 40-41
8 (App. 2010) (the deliberative process privilege has not heretofore been adopted in
9 Arizona; declining to adopt privilege because agencies may not withhold records unless
10 statutorily exempted from public records law); see also *Star Publishing Co. v. Pima
County Attorney's Office*, 181 Ariz. 432 (1994). Such withholding of public records
itself may be deemed arbitrary and capricious. (*Star Publishing*, at 434.) In our
context, this improper and capricious withholding of the records supports the inference
of undue regulatory interference in deliberations for political purposes not authorized
by law. [footnote omitted]

11 Appellant has listed the relevant witnesses to such communications and
12 evidence in his Supplemental Notice of Witnesses and Exhibits filed on June 24, 2013,
13 as 13A-A006-DEQ-0083.pdf, and may necessitate subpoenas to obtain withheld records
14 or procure such testimony.

15 Appellant makes this argument based on the position of ADEQ and based on the
16 information about the documents that ADEQ has withheld from the parties, and
17 obviously does not have the benefit of the actual underlying documents which have
18 been withheld.

19 This anticipated testimony and evidence is directly relevant on the context
20 surrounding and the issuance of the permit, especially the context and effect such issues
21 had or may have had on ADEQ's ultimately arbitrary and unreasonable issuance of the
22 permit, as well as their unreasonable reliance on unscientific or flawed data or methods
23 in issuing the permit.

24 (Appellant Fisher's PreHearing Brief at pp. 24-25.)

25 Appellant Fisher's PreHearing Brief cited statute and policy which explain the mission
26 and mandate of the Agency, and that its mission is public health, not politics or public image.

Furthermore, A.R.S. § 49-426 E states that “permits or revisions issued pursuant to this section
or section 49-426.01 may be issued subject to such terms and conditions as are consistent with
the requirements of this article, article 1 of this chapter and the clean air act” Yet, ADEQ's
withheld emails -- and reason for withholding- suggest political involvement and ADEQ states
the records reflect government deliberations.

1 Such witnesses may confirm that the evidence withheld by ADEQ included
2 consideration of matters having nothing to do with public health in relation to the permit. Such
3 evidence supports the Appellant's perspective that the issuance was unreasonable and arbitrary
4 and based on matters not otherwise permitted by Arizona or Federal law.

5 Arizona environmental policy related to air pollution and ADEQ's mandate can be
6 found in A.R.S. Section 49-401. The fact that the ADEQ's decisions must be based on the law,
7 public health, and the following policy, is obvious and cannot be understated.
8

9 Section 49-401. Declaration of policy.

10 A. The legislature finds and declares that air pollution exists with varying degrees of
11 severity within the state, such air pollution is potentially and in some cases actually
12 dangerous to the health of the citizenry, often causes physical discomfort, injury to
13 property and property values, discourages recreational and other uses of the state's
14 resources and is esthetically unappealing. The legislature by this act intends to exercise
15 the police power of this state in a coordinated state-wide program to control present and
16 future sources of emission of air contaminants to the end that air polluting activities of
17 every type shall be regulated in a manner that insures the health, safety and general
18 welfare of all the citizens of the state; protects property values and protects plant and
19 animal life. The legislature further intends to place primary responsibility for air
20 pollution control and abatement in the department of environmental quality and the
21 hearing board created thereunder. However, counties shall have the right to control
22 local air pollution problems as specifically provided herein.

23 B. It is further declared to be the policy of this state that no further degradation of the
24 air in the state of Arizona by any industrial polluters shall be tolerated. Those industries
25 emitting pollutants in the excess of the emission standard set by the director of
26 environmental quality shall bring their operations into conformity with the standards
with all due speed. A new industry hereinafter established shall not begin normal
operation until it has secured a permit attesting that its operation will not cause
pollution in excess of the standards set by the director of environmental quality.

Furthermore, although the Director of ADEQ serves at the pleasure of the Governor, it
is actually *the Director*, not the Governor, who is empowered with the statutory directive to
“administer the Department” in carrying out its overall mission to protect public health. See
A.R.S. 49-102(B) (“The Director shall administer the Department”)

1 Yet, ADEQ itself has asserted that the Governor's Office was involved in deliberative
2 process with ADEQ on the Permit by refusing to release public records and citing a
3 “deliberative process” public records exemption to releasing numerous emails between staff
4 and the governor's apparent public relations representative. Such political involvement in the
5 deliberative process of agency decision making on issuance of a permit is ostensibly *ipso facto*
6 illegal and not otherwise permitted by law or regulation. This certainly diminishes the
7 expected impartiality of a government agency involved in issuance of a permit, and the related
8 quasi-judicial functions currently underway.
9

10 Finally, to the extent the records that were disclosed by ADEQ suggest that ADEQ was
11 concerned with other matters not applicable to the legal and environmental standards, such as
12 speed or expediency, and an apparent concern with public image as opposed to public health,
13 such considerations are similarly wrong and should not have occurred.
14

15 **III. CONCLUSION**

16 The ADEQ Motion in Limine should be denied. The witnesses and records disclosed
17 by ADEQ, and their refusal to disclose other records, arguably support the view that improper
18 matters impacted the context and deliberative decisional process in an unreasonably and
19 arbitrary manner, resulting in a permit that is unsupported. This evidence was not otherwise
20 known to Appellant until ADEQ provided records on May 23, 2013, but also withheld the
21 records discussed above, mentioning the listed witnesses now in dispute. That is relevant
22 evidence, and as such the listed witnesses are provided for this relevant evidentiary basis.
23

24 Dated: July 9, 2013

RESPECTFULLY SUBMITTED

25 

26 _____
VINCE RABAGO, Attorney for Joel Fisher

1 CERTIFICATE OF SERVICE

2 I certify that the foregoing document was filed
3 electronically on July 9, 2013, with the OAH,
4 via the Court's online docketing system by emailing
the document to webmaster@azoah.gov, which
served all parties and counsel electronically:

5 s/ Vince Rabago, Esq.
6 Vince Rabago

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EXHIBIT A

List of Confidential Emails - Rosemont Copper Company

DATE	SUBJECT	FROM	TO	CC	Reason for Withholding
7/13/2012	attorney-client privilege:Rosemont	Joseph Mikitish	Trevor Baggione	Eric C. Massey, Henry Darwin	attorney-client privilege
12/2/2011	Rosemont goes to ADEQ	Henry Darwin	Eric C. Massey; Trevor Baggione		deliberative process privilege - Email correspondence developing briefing memo for Governor's office & Press release
8/1/2012	Rosemont	Kevin Kinsall	Eric C. Massey		
12/9/2011	Rosemont, phone call	Joseph Mikitish	Eric C. Massey; Trevor Baggione		
8/1/2012	Rosemont	Kevin Kinsall	Eric C. Massey		
8/3/2012	RE:Are you in agreement with what Benson wants to do in the headline and first paragraph of getting away from our asserting jurisdiction?..	Eric C Massey	Mark Shaffer, Henry Darwin	Trevor Baggione	
8/3/2012	RE: For your review, revised ROSEMONT release	Eric C Massey	Mark Shaffer; Henry Darwin; Mathew Benson	Trevor Baggione	
8/2/2012	RE: For your review, revised ROSEMONT release	Eric C Massey	Mark Shaffer; Trevor Baggione	Michael A. Fluton; Linda C. Taunt; Henry Darwin	
8/8/2012	RE: Rosemont Newspaper Ads	Kevin Kinsall	Eric C. Massey		
8/1/2012	RE: Rosemont	Henry Darwin	Eric C. Massey		
8/1/2012	RE: Rosemont	Henry Darwin	Eric C. Massey		

Privilege Log - Rosemont Copper Company

DATE	SUBJECT	FROM	TO	Copy To	Reason for Withholding	Description
12/2/2011	Rosemont goes to ADEQ	Henry Darwin	Eric C. Massey; Trevor Baggione		Deliberative process privilege in best interest of State	Relates to discussions with the Governor's office regarding Superior Court decision & asserting jurisdiction
12/9/2011	Rosemont, phone call	Joseph Mikitish	Eric C. Massey; Trevor Baggione		Was accidentally listed in the log previously. Has been made available with other emails sent previously	
7/13/2012	Attorney-client privilege:Rosemont	Joseph Mikitish	Trevor Baggione	Eric C. Massey, Henry Darwin	Attorney-client privilege	Discussions with the Attorney General's Office regarding Superior Court decision & asserting jurisdiction
8/1/2012	Rosemont	Kevin Kinsall	Eric C. Massey		Deliberative process privilege in best interest of State	Discussion with the Governor's Office regarding potential considerations for asserting jurisdiction
8/1/2012	Rosemont	Kevin Kinsall	Eric C. Massey			
8/1/2012	RE: Rosemont	Henry Darwin	Eric C. Massey			
8/1/2012	RE: Rosemont	Henry Darwin	Eric C. Massey			
8/2/2012	RE: For your review, revised ROSEMONT release	Eric C Massey	Mark Shaffer; Trevor Baggione	Michael A. Fulton; Linda C. Taunt; Henry Darwin	Deliberative process privilege in best interest of State	Relates to discussions with the Governor's Office regarding drafting of press release
8/3/2012	RE:Are you in agreement with what Benson wants to do in the headline and first paragraph of getting away from our asserting jurisdiction?..	Eric C Massey	Mark Shaffer, Henry Darwin	Trevor Baggione		
8/3/2012	RE: For your review, revised ROSEMONT release	Eric C Massey	Mark Shaffer; Henry Darwin; Mathew Benson	Trevor Baggione		
8/8/2012	RE: Rosemont Newspaper Ads	Kevin Kinsall	Eric C. Massey		Deliberative process privilege in best interest of State	Discussion with the Governor's Office regarding newspaper articles and commencement of public notice process

DATE	SUBJECT	FROM	TO	CC	Reason for Withholding
7/13/2012	attorney-client privilege:Rosemont	Joseph Mikitish	Trevor Baggione	Eric C. Massey, Henry Darwin	attorney-client privilege
12/2/2011	Rosemont goes to ADEQ	Henry Darwin	Eric C. Massey; Trevor Baggione		deliberative process privilege - Email correspondence for developing briefing memo for Governor's office and Press Release
8/1/2012	Rosemont	Kevin Kinsall	Eric C. Massey		
12/9/2011	Rosemont, phone call	Joseph Mikitish	Eric C. Massey; Trevor Baggione		
8/1/2012	Rosemont	Kevin Kinsall	Eric C. Massey		
8/1/2012	Rosemont	Eric C Massey	Kevin Kinsall		
8/3/2012	RE:Are you in agreement with what Benson wants to do in the headline and first paragraph of getting away from our asserting jurisdicstin?..	Eric C Massey	Mark Shaffer, Henry Darwin	Trevor Baggione	
8/3/2012	RE: For your review, revised ROSEMONT release	Eric C Massey	Mark Shaffer; Henry Darwin; Mathew Benson	Trevor Baggione	
8/2/2012	RE: For your review, revised ROSEMONT release	Eric C Massey	Mark Shaffer; Trevor Baggione	Michael A. Fluton; Linda C. Taunt; Henry Darwin	
8/8/2012	RE: Rosemont Newspaper Ads	Kevin Kinsall	Eric C. Massey		
8/1/2012	RE: Rosemont	Henry Darwin	Eric C. Massey		
8/1/2012	RE: Rosemont	Henry Darwin	Eric C. Massey		

DATE	SUBJECT	FROM	TO	CC	Reason for Withholding
7/13/2012	attorney-client privilege:Rosemont	Joseph Mikitish	Trevor Baggiore	Eric C. Massey, Henry Darwin	attorney-client privilege
12/2/2011	Rosemont goes to ADEQ	Henry Darwin	Eric C. Massey; Trevor Baggiore		deliberative process privilege - Email correspondence for developing briefing memo for Governor's office and Press Release
8/1/2012	Rosemont	Kevin Kinsall	Eric C. Massey		
12/9/2011	Rosemont, phone call	Joseph Mikitish	Eric C. Massey; Trevor Baggiore		
8/1/2012	Rosemont	Kevin Kinsall	Eric C. Massey		
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8/3/2012	RE: For your review, revised ROSEMONT release	Eric C Massey	Mark Shaffer; Henry Darwin; Mathew Benson	Trevor Baggiore	
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8/1/2012	RE: Rosemont	Henry Darwin	Eric C. Massey		
8/1/2012	RE: Rosemont	Henry Darwin	Eric C. Massey		



TOM HORNE
ATTORNEY GENERAL

OFFICE OF THE ARIZONA ATTORNEY GENERAL
PUBLIC ADVOCACY DIVISION
Environmental Enforcement Section

CURTIS A. COX
ASSISTANT ATTORNEY GENERAL
CURTIS.COX@AZAG.GOV
(602) 542-7781

May 22, 2013

Vince Rabago, Esq.
Vince Rabago Law Office
500 N. Tucson, Blvd., Ste. 100
Tucson, AZ 85716

Re: Save the Scenic Santa Ritas v. Rosemont Copper Project
(Consolidated); Docket No. 13A-A010-DEQ.

Dear Mr. Rabago:

Enclosed please find a set of five CDs with ADEQ documents in this case. Each page of the ADEQ documents has been assigned a distinct Bates-labeled page number which has been electronically printed on the bottom of each page. Also enclosed is a document log describing the ADEQ documents with the range of Bates-labeled page numbers. The log contains the following headings, which are further described as follows:

Applications – includes application materials submitted by Rosemont;

Permit Documents – includes ADEQ generated documents such as the request for additional information, final permit, public notices and hearing, invoices, and final grant letter;

Shared Dropbox Files – these documents include the documents that were requested and provided through a shared electronic dropbox with the appellant, Save the Scenic Santa Ritas (many of these documents are duplicates of documents that are under one of the other listed categories);

ADEQ Early Bird – news publications;

Email Correspondence;

Rosemont Case Management Order;

Modeling Run Files – we are unable to print this data into paper documents for bates labeling, so the single Bates label number applies to

Vince Rabago
Vince Rabago Law Office
May 22, 2013
Page 2

the entire disk, which contains the modeling data for the specific models runs; and

Privilege Log (hardcopy).

If you have any questions, please contact us by phone or email.

Sincerely,

A handwritten signature in black ink, appearing to read 'Curtis A. Cox', written in a cursive style.

Curtis A. Cox
Assistant Attorney General
Environmental Enforcement Section

CAC/jmt
Eric Massey, ADEQ
Balaji Vaidyanathan, ADEQ

Document sent via US Mail
3378609

Rosemont Document Log

Folder	Bates Beg	Bates End
Applications	AZRP00001	AZRP01226
Permit Documents	AZRP01227	AZRP01825
Permit Documents	AZRP01826	AZRP02388
Modeling Documents	AZRP02389	AZRP02707
Shared Dropbox Files	AZRP02708	AZRP04270
ADEQ Early Bird	AZRP04305	AZRP04350
Email Correspondence	AZRP04351	AZRP06364
Rosemont Case Mangement Order	AZRP06365	AZRP06369
Modeling Run Files	AZRP06370	AZRP06370