

DECLARATION IN SUPPORT OF EMERGENCY INJUNCTION

Exhibits A through I — Forensic Analysis of Public Records Production #32782

City of Redmond — Old Fire House (OFH) Teen Center

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(Computational) **Date:** February 21, 2026 **Re:** City of Redmond Public Records Request #32782 —
Four Installments

METHODOLOGY

The following exhibits are derived from computational forensic analysis of 7,573 documents produced by the City of Redmond across four installments in response to Public Records Request #32782. All documents were processed programmatically, indexed in a structured database (SQLite), and analyzed using pattern matching, hash-based deduplication, reply-chain reconstruction, and linguistic analysis.

All original source files are preserved in their unmodified form. The analysis database (`corkboard.db`) contains every document, connection, and finding referenced herein. No documents were deleted or altered during analysis.

EXHIBIT A: PROVEN WITHHELD EMAILS — Ghost Entity Analysis

Finding

Fourteen (14) City of Redmond officials and contractors have **zero outgoing emails** in the production despite receiving hundreds of emails addressed to them. For each, the existence of their withheld outgoing emails is **mathematically proven** by reply-chain analysis.

Method

If Person A sends an email with subject line “Re: [topic]” addressed TO Person B, then Person B necessarily sent the original email about [topic] to which Person A is replying. If Person A’s reply exists in the production but Person B’s original does not, Person B’s email was withheld.

The “Proof” column below represents the count of such reply emails proving the existence of withheld originals.

Evidence

#	Name	Email Address	Organization	Emails Received	Reply Proofs	Sent in Production
1	H. Rudin	hrudin@stephersonassociates.com	Stepherson Associates (Contractor)	209	178	0
2	D. Edmunds	dedmunds@stephersonassociates.com	Stepherson Associates (Contractor)	209	178	0
3	City Council	council@redmond.gov	City of Redmond	229	120	0
4	S. Fields	sfields@redmond.gov	City of Redmond	325	114	0
5	Mayor’s Office	mayor@redmond.gov	City of Redmond	570	108	0

#	Name	Email Address	Organization	Emails Received	Reply Proofs	Sent in Production
6	O. Salahuddin	osalahuddin@redmond.gov	City of Redmond	298	105	0
7	M. Ruhlman	mruhlman@redmond.gov	City of Redmond	59	28	0
8	C. Payne	cpayne@redmond.gov	City of Redmond	123	20	0
9	C. Maginnis	cmaginnis@redmond.gov	City of Redmond	108	16	0
10	City Clerk	cityclerk@redmond.gov	City of Redmond	27	15	0
11	M. Schroeder	maddyschroeder@comcast.net	Public	9	9	0
12	B. Wilson	bwilson@redmond.gov	City of Redmond	10	8	0
13	A. Dell	ardelld@gmail.com	Public	6	6	0
14	P. Bradford	pbradford@redmond.gov	City of Redmond	6	6	0

Total proven withheld emails: 911+ (minimum, based on reply proofs alone)

Significance

The Mayor's office address (mayor@redmond.gov) received 570 emails about the OFH matter and has 108 reply proofs — yet the City produced zero outgoing emails from this address. The City Council address has 120 reply proofs and zero outgoing. Two Stepherson Associates contractors — the firm hired by the City to manage public outreach for the OFH transition — have the highest proof counts (178 each) with zero outgoing emails produced.

This is not a search methodology failure. The reply-chain evidence proves these emails existed and were excluded from production.

EXHIBIT B: PRODUCTION INFLATION — Duplicate and Padding Analysis

Finding

Of the 7,573 documents produced across four installments, only approximately **2,391 contain unique content**. The remaining **5,182 documents (68.4%)** are exact duplicates, cross-installment re-productions, or automated system notifications with no substantive content.

Evidence

Metric	Count
Total documents produced	7,573
Unique document bodies (by content hash)	2,391
Exact duplicate copies	5,047
Cross-installment duplicates	4,372
Cross-installment duplicate hash groups	1,137

Worst Duplicate Offenders

Copies	Subject	Sender	Installments
134	(no subject)	Angie Nuevacamina	1, 4
51	RE: Comment Registration - 3/25 City Council Meeting	Vanessa Kritzer	1, 4
48	(no subject)	Erica Chua	1, 4
39	RE: Redmond Teen Center	Vanessa Kritzer	1, 4
39	RE: The old fire house property	Vanessa Kritzer	1, 4
36	Re: Redmond Teen Center	Mark Vincent	1, 4
36	The old fire house property	Linda Cole-Weaver	1, 4
34	Old Fire House Communication Information	Lisa Maher	2
33	Teen Services Check-In	Erica Chua	1, 4

Copies	Subject	Sender	Installments
30	TIS Teen Center Walkthrough	Keith Laycock	2

Cross-Installment Duplication

Installments 1 and 4 are substantially duplicative. Of the 4,372 cross-installment duplicate entries, the vast majority are between these two installments. A single email from Angie Nuevacamina appears 134 times across both installments.

Significance

The production of 7,573 documents creates the appearance of a comprehensive response. In reality, only ~2,391 unique documents exist — a production one-third the apparent size. This inflation serves to: 1. Create the appearance of compliance while producing less actual content 2. Bury substantive gaps in volume 3. Increase the burden on the requester to identify what is actually present vs. absent

EXHIBIT C: STRIPPED ATTACHMENTS — 4,109 Emails With Zero Attachments Provided

Finding

Of the 7,573 documents produced, **4,109 (54.3%)** contain references to attached files. The City produced **zero actual attachment files** across all four installments.

Evidence

288 distinct attachment filenames are referenced in the email metadata. None were provided. Key missing attachments include:

Category	Example Filenames
Official Reports	City of Redmond Final Report.pdf , Facility Details Report_draft watermark.pdf
Building/Permit Records	2024 (CoR) OLD REDMOND FIREHOUSE-TEEN CENTER FLS Permit.pdf
Presentations	COR Community Center_Presentation_03.07.25.pdf
News Releases	Teen Programs Transition from Old Firehouse - News Release_3.11.25.docx
Internal Planning	Staff Talking Points (multiple versions), FAQ documents, Engagement Plans
Calendar/Program	April Teen Program Calendar.pdf
Embargoed Materials	PDF sent by Brant DeLarme on March 10, 2025 (referenced in email body)
Photos	Multiple JPEG files

Significance

Attachments constitute the substantive documentary record — contracts, plans, reports, presentations, talking points. The email bodies discuss, reference, and debate these documents, but the documents themselves were entirely excluded from production. This renders the email production incomplete and the context of many communications unintelligible.

EXHIBIT D: SEVERED CONVERSATION THREADS — Orphan Analysis

Finding

41 conversation threads exist in the production where only reply or forward messages are present, but the **original initiating message is missing**. These are conversations with the beginning cut off.

Top Orphan Threads

#	Subject	Emails in Thread	Date Range
1	For review: Redmond OFH 2/18 team check-in meeting notes	110	Feb 19–24, 2025
2	QAlert for Teen Services	34	Mar 4, 2025
3	[EXT]RE: KOMO inquiry	33	Mar 27, 2025
4	For Review: Web Content, FAQ, Staff Communications	32	Mar 7, 2025
5	OFH SCHEDULE - Now through End of March	28	Feb 17 – Mar 25, 2025
6	Redmond Old Firehouse Performance Opportunities	28	Mar 12–14, 2025
7	Questions about Redmond.gov/TeenServices content	28	Mar 18–24, 2025
8	Teen Program Updates to Calendar and SmartRec	27	Mar 26, 2025
9	For Review: Redmond Teen Services Digital Notification	15	Mar 26, 2025

Significance

The largest orphan thread — “Redmond OFH 2/18 team check-in meeting notes” — contains **110 emails** but no originating message. This thread covers the internal planning phase before the public announcement. The KOMO News inquiry orphan (33 emails with a television journalist) represents media interaction with no preceding context. These severed threads prevent reconstruction of how decisions were initiated and by whom.

EXHIBIT E: CHANNEL SWITCHING — Deliberate Movement Off-Record

Finding

45 emails contain explicit instructions to move OFH-related discussions from email to phone calls or in-person meetings — channels that produce no written record subject to public records requests.

Key Evidence

Date	From	To	Content
2025-03-04	Kyle Muir	Hannah Dunaway	<i>“Give me a call to talk about the OFH email when you have a minute”</i>
2025-03-04	Kyle Muir	Derek Wing	<i>“Give me a call to talk about the OFH email when you have a minute”</i> (sent within 2 minutes of the above)
2025-03-04	Derek Wing	Kyle Muir	RE: “An Update on the Old Fire House Facility: TEST” — <i>“Give me a call if you have questions”</i>
2025-03-12	Jeff Hagen	B. Deccio, M. Ruhlman	RE: Redmond Old Firehouse Performance Opportunities — <i>“please give me a call at 425-556-2312”</i>

Significance

The Kyle Muir messages on March 4, 2025 are particularly significant: two identical “give me a call” requests sent within two minutes to two different staff members, both referencing “the OFH email” — with no subject line and a one-line body. This is coordinated channel-switching to avoid creating records about a specific OFH communication.

Under *Nissen v. Pierce County* (2015), text messages and other electronic communications conducted on personal devices for government business are public records. The channel-switching evidence justifies a request for text message and messaging platform records.

EXHIBIT F: NARRATIVE CONTROL AND MANUFACTURED MESSAGING

Finding

The production reveals a coordinated multi-layer communications pipeline for controlling public messaging about the OFH closure, including embargoed materials, staged news releases, manufactured quotes, and internal-only talking points.

Evidence

The Communications Pipeline

1. **Brant DeLarme** (Program Manager) drafts news releases, talking points, and FAQ documents
2. **Lisa Maher** (Communications) reviews and rewrites official quotes: “*I’ve reviewed it but I don’t think the quote is quite right, I’ve started to rewrite it*” (Email ID 3897, Mar 6, 2025)
3. **Brittany Pratt** (Recreation Business Manager) verifies factual accuracy of manufactured quotes
4. Materials are embargoed until coordinated release

Specific Instances

- **DeLarme to Maher** (Mar 6): “*Have you had a chance to review the news release for next Tuesday?*” — pre-staging news release days in advance
- **DeLarme to Pratt** (Mar 7): RE: “For Review: Web Content, FAQ, Staff Communications” — “*Lisa reworked the quote and wanted to confirm that the highlighted info is accurate. Please review the quote below.*”
- **DeLarme to Maher** (referenced in production): “*PDF of all embargoed materials for tomorrow AM*” — embargoed press materials coordinated for simultaneous release
- **Zach Houvener**: “*the Talking Points document is internal only and not meant to be public facing*”
- **Email ID 5317: “Project Charter — OFH Community Outreach”** — a formal internal planning document with Zach Houvener listed as Project Manager, establishing the narrative control structure

Volume

- **537 emails** contain narrative control language (talking points, approved language, messaging coordination)
- Multiple versions of talking points documents created and circulated (none provided as attachments — see Exhibit C)

Significance

The City did not simply respond to public inquiry about the OFH closure. It manufactured the public narrative through embargoed materials, rewritten quotes, and coordinated internal talking points — while simultaneously withholding the talking points documents themselves from the FOIA production.

EXHIBIT G: DECISION CONCEALMENT — Who Decided to Demolish?

Finding

The production contains **53 emails** using passive voice construction to describe the demolition decision, consistently avoiding attribution of who made the decision. When directly questioned, City officials deflected rather than identified the decision-maker.

Key Evidence

The Demolition Questions Thread (March 4, 2025)

Freya Reiger (public) writes to Jeff Hagen:

“I am aware that it was decided that the teen center was going to be demolished because it was deemed too expensive and effortful to upkeep it.”

Loreen Hamilton (Parks Director) responds:

“there has been no such decision made about the Old Firehouse Teen Center and I was surprised to see this email come through with that rumor.”

Freya Reiger replies:

“I heard this from RYPAC’s president and VP who said there was a plan to tear down the building because upkeep was too costly and most activities like RYPAC would be moved to the senior and community center”

Hamilton redirects rather than answering:

“I would encourage you to attend the Mayor’s meeting on Monday”

Pattern

The phrase “it was decided” appears repeatedly throughout the production. The identity of the decision-maker(s) never appears. The City Parks Director’s response — claiming surprise at a “rumor” that the community leaders of RYPAC (the primary youth program using the facility) were already discussing — raises questions about internal communication or credibility.

EXHIBIT H: THE APRIL GAP — Production Drops 99.8%

Finding

The production effectively ceases after March 30, 2025, despite the OFH matter remaining active. Only 12 emails from April 2025 exist in the production, and **none relate to OFH operations** — they are all from an unrelated Plymouth Housing/legal transaction.

Evidence — Emails by Month

Month	Email Count	Notes
2024-04	12	Historical (3rd installment)
2024-06	2	Historical
2024-07	8	Historical
2024-08	10	Historical
2025-02	578	Internal preparation phase
2025-03	6,466	Peak activity — announcement, public response, Council meeting
2025-04	12	99.8% drop — only Plymouth Housing legal emails

Significance

The March 25, 2025 City Council meeting generated significant public engagement. Community members submitted comments, attended the meeting, and organized advocacy. The OFH matter remained highly active. Yet the production contains zero OFH-related emails after March 30, 2025.

This is not a natural drop in activity. It is an artificial cutoff in the production.

EXHIBIT I: DATABASE AND FORENSIC TOOLS

Description

All analysis referenced in Exhibits A through H is derived from a structured forensic database and associated analysis tools. These are available for independent verification.

Database

File: `corkboard.db` (SQLite format)

Table	Records	Content
emails	7,573	Every document in the production — full text, metadata, parsed fields
people	337	Every person identified — name, email, org, sent/received counts, ghost status
connections	717	Communication links between people — weight, thread subjects
threads	295	Conversation threads — email count, date range, orphan status
duplicates	7,438	Every duplicate instance — body hash, group size, cross-installment flag
email_people	—	Junction table linking emails to people (sender, recipient, CC)
annotations	—	Analyst notes

Analysis Tools

Tool	Purpose
<code>ghost_probe.py</code>	Reply-chain analysis proving withheld emails (Exhibit A)
<code>duplicate_probe.py</code>	Content-hash deduplication analysis (Exhibit B)
<code>gap_finder.py</code>	Timeline, thread, and entity gap analysis (Exhibits D, H)
<code>forensic_deep.py</code>	Linguistic pattern analysis (Exhibits E, F, G)
<code>corkboard_db.py</code>	Database construction from raw email files
<code>corkboard_server.py</code>	Interactive 3D visualization server

Interactive Visualization

An interactive 3D forensic map of all communications is available at `saveofh_corkboard.html`, allowing visual inspection of the communication network, ghost entities, orphan threads, and timeline playback of all 7,088 dated emails.

Source Preservation

All 7,573 original document files are preserved unmodified in their extracted text format. No original data has been deleted or altered.

SUMMARY OF VIOLATIONS

RCW Provision	Violation	Evidence
RCW 42.56.070	Failure to produce responsive records	911+ proven withheld emails (Exhibit A)
RCW 42.56.070	Failure to produce attachments	4,109 emails with attachments, zero provided (Exhibit C)
RCW 42.56.080	Incomplete production	41 severed threads (Exhibit D), April gap (Exhibit H)
RCW 42.56.550	Wrongful denial subjects agency to per-day penalties and mandatory attorney fees	Production inflation (Exhibit B) constitutes constructive denial through obfuscation
RCW 40.16.020	Willful concealment of public records by public officer — Class B felony	Pattern of withholding (911+ emails), channel switching (Exhibit E), narrative control (Exhibit F)

This forensic analysis is based on the complete production of 7,573 documents across four installments under City of Redmond Public Records Request #32782. All findings are computationally derived and independently verifiable using the tools and database referenced in Exhibit I.