

Board of Trustees



William F. Quinn
Chairman
Mayoral Appointee
Term Expires 8/2020



Nicolas A. Merrick
Vice Chairman
Mayoral Appointee
Term Expires 8/2019



Samuel Friar
Deputy Vice Chairman
Fire Trustee
Term Expires 8/2020



Blaine Dickens
Non-member Trustee
Term Expires 8/2019



Gilbert Garcia
Non-member Trustee
Term Expires 8/2019



Tina Hernandez Patterson
Non-member Trustee
Term Expires 8/2019



Ray Nixon
Mayoral Appointee
Term Expires 8/2019



Frederick E. Rowe
Mayoral Appointee
Term Expires 8/2020



Joseph Schultz
Police Trustee
Term Expires 8/2020



Robert C. Walters
Mayoral Appointee
Term Expires 8/2020



Kneeland Youngblood
Mayoral Appointee
Term Expires 8/2019

News Details

Sam Friar, Fire Fighter Trustee, Has Resigned From The Board.

5/1/2019

Sam Friar, Fire Fighter Trustee, has resigned from the Board. Sam served on the Board since 2011, including serving as Chairman during the challenging times prior to September 1, 2017. We would like to thank Sam for his service to DFPF. Information about the election to fill the Fire Fighter Trustee position will be available after the Board approves the materials at the May 9th Board meeting.

Dallas Police & Fire Pension Committees

DPFP BOARD APPOINTMENTS 2015 - 2017

Diamond McCarthy Committee – System trustees Tho Tang Ho (Chair), Clint Conway, and Brian Hass; inaugural committee appointments made during a Special meeting of the Board on August 27, 2015. No meetings have ever been publically posted for this committee.

December 1, 2016

Mr. Lee M. Kleinman
Member, Dallas City Council
1500 Marilla St, 5FS
Dallas, TX 75201-6390

Dear Councilmember Kleinman:

RE: Dallas Police & Fire Pension System

It would be interesting to understand why former administrator Richard Tettamant has not been sued by the Dallas Police & Fire Pension System for the obvious benefit of taking Tettamant's deposition, but then again, the same could be said for former and at least one current trustee.

It would also be interesting to understand the Board's decision on August 11, 2016, to authorize its executive staff to enter into a settlement agreement with its former real estate manager, having spent hundreds of thousands litigating the matter but with no legal discovery to show. I trust you would agree.

Sincerely,

/s/ Columbus A. Alexander, III, CPA
Certified Fraud Examiner

Enclosures (38)

From: Joshua Mond
To: Summer Loveland
Cc: Kelly Gottschalk
Subject: Re: ORR for Alexander
Date: Saturday, October 29, 2016 07:02:25

I just need to check what she sent versus what we filed against CDK. I will do that Tuesday and we can reply then. They are only seeking the date we filed all those pleadings, almost all of which we did not file. (Threw the comma in for you Summer.)

Sent from my iPad

On Oct 28, 2016, at 9:55 AM, Summer Loveland <summerl@dcpf.org> wrote:

Josh,

All of the ORRs for Alexander are due Monday. Can you let us know status with Andrea/Julie?

Summer L. Loveland

Chief Financial Officer
Dallas Police & Fire Pension System
4100 Harry Hines Blvd., Suite 100
Dallas, TX 75219

214.780.2815 phone
214.638.6403 fax
summerl@dcpf.org

Julie Kobel

From: Joshua Mond [joshuam@dpfp.org]
Sent: Thursday, December 01, 2016 11:57 AM
To: julie.kobel@dpfps.org
Cc: Carol Huffman; Joshua Mond
Subject: RE: Request for Status - Open Records Requests ID # 1611-023 thru 1611-058

Ms. Kobel, there are no documents responsive to your requests noted below.

From: Julie Kobel [mailto:julie.kobel@dpfps.org]
Sent: Tuesday, November 29, 2016 9:29 AM
To: info@dpfp.org
Cc: Joshua Mond <joshuam@dpfp.org>; Carol Huffman <Carolh@dpfp.org>; Julie Kobel <julie.kobel@dpfps.org>
Subject: Request for Status - Open Records Requests ID # 1611-023 thru 1611-058

Officer for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

RE: Texas Public Information Act – Open Records Requests
Dallas Police & Fire Pension System
ID # 1611-023 thru 1611-058
Request for Status

On Monday, November 7, 2016, pursuant to the Texas Public Information Act, I submitted (via email) thirty-six separate requests for information regarding the Dallas Police & Fire Pension System.

The aforementioned requests for information may be identified by Open Records ID 1611-023 thru 1611-058, and are regarding litigation filed by former DPFP real estate manager CDK and the Dallas Police & Fire Pension System, and related litigation discovery by and between the parties.

Not wanting to be a pest, but the status of the aforementioned thirty-six information requests submitted to your attention on November 7, 2016, would be appreciated. Thank you.

Sincerely,

Julie Kobel

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-023**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **CDK Realty Advisors, LP** - All "Request for Production of Documents" discovery requests issued by the System, and/or its attorneys, and/or its law firms to CDK Realty Advisors, LP in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-024**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **CDK Advisors, LLC** - All "Request for Production of Documents" discovery requests issued by the System, and/or its attorneys, and/or its law firms to CDK Advisors, LLC in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-025**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Kenneth Cooley** - All "Request for Admissions" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Kenneth Cooley in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-026**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Kenneth Cooley** - All "Request for Interrogatories" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Kenneth Cooley in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-027**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Kenneth Cooley** - All "Request for Production of Documents" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Kenneth Cooley in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-028**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Kenneth Cooley** - All "Notice of Intent to take Oral Deposition" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Kenneth Cooley in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-029**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Request for Admissions" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Jon Donahue in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-030**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Request for Interrogatories" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Jon Donahue in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-031**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Request for Production of Documents" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Jon Donahue in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-032**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Notice of Intent to take Oral Deposition" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Jon Donahue in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-033**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Brent Kroener** - All "Request for Admissions" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Brent Kroener in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-034**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Brent Kroener** - All "Request for Interrogatories" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Brent Kroener in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-035**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Brent Kroener** - All "Request for Production of Documents" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Brent Kroener in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-036**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Brent Kroener** - All "Notice of Intent to take Oral Deposition" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Brent Kroener in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-037**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Marshall Edwards** - All "Request for Admissions" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Marshall Edwards in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-038**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Marshall Edwards** - All "Request for Interrogatories" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Marshall Edwards in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-039**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Marshall Edwards** - All "Request for Production of Documents" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Marshall Edwards in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-040**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Marshall Edwards** - All "Notice of Intent to take Oral Deposition" discovery requests issued by the System, and/or its attorneys, and/or its law firms to Marshall Edwards in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-041**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **CDK Realty Advisors, LP** - All "Request for Production of Documents" discovery requests issued by CDK Realty Advisors, LP to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-042**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **CDK Advisors, LLC** - All "Request for Production of Documents" discovery requests issued by CDK Advisors, LLC to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-043**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Kenneth Cooley** - All "Request for Admissions" discovery requests issued by Kenneth Cooley to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-044**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Kenneth Cooley** - All "Request for Interrogatories" discovery requests issued by Kenneth Cooley to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-045**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Kenneth Cooley** - All "Request for Production of Documents" discovery requests issued by Kenneth Cooley to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-046**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Kenneth Cooley** - All "Notice of Intent to take Oral Deposition" discovery requests issued by Kenneth Cooley to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-047**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Request for Admissions" discovery requests issued by Jon Donahue to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-048**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Request for Interrogatories" discovery requests issued by Jon Donahue to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-049**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Request for Production of Documents" discovery requests issued by Jon Donahue to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-050**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Jon Donahue** - All "Notice of Intent to take Oral Deposition" discovery requests issued by Jon Donahue to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

Dear Public Information Officer:

**RE: Texas Public Information Act - Open Records Request
CDK Realty Advisors, LP v Dallas Police & Fire Pension System
Cause No. DC-16-01566
ID # 1611-051**

On April 5, 2016, the Dallas Police & Fire Pension System by and through its attorneys filed a Counterclaim against CDK Realty Advisors, LP, and various third-party defendant's to include CDK Advisors, LLC, Kenneth Cooley, Jon Donahue, Brent Kroener, and Marshall Edwards.

Pursuant to the Texas Public information Act, Chapter 552, Texas Government Code, please provide the following information regarding the Dallas Police & Fire Pension System, its employees, and its Board of Trustees (collectively, the "System"):

1. **Brent Kroener** - All "Request for Admissions" discovery requests issued by Brent Kroener to the System, and/or its attorneys, and/or its law firms in the above-referenced cause-of-action.

Important to note "discovery" in the law of the United States, is a pre-trial procedure in a lawsuit in which each party, through the law of civil procedure, can obtain evidence from the other party or parties by means of discovery devices such as a request for answers to interrogatories, request for production of documents, request for admissions, and depositions.

Also important to note "pleadings" in the law of the United States, are the beginning stage of a lawsuit in which parties formally submit their claims and defenses. The plaintiff submits a complaint stating the cause of action -- the issue or issues in controversy. The defendant submits an answer stating his or her defenses and denials.

Most important to note this Open Records Request is for discovery, not pleadings, in the above referenced cause-of-action.

In addition, please note I am requesting a written itemized statement of estimated charges be provided in advance of work being started should the estimated charge for producing information responsive to this Open Records Request exceed \$1. Thank you in advance for your anticipated timely cooperation.

Sincerely,

/s/ Julie Kobel, Requestor

Post Office Box 455
Addison, TX 75001-0455

November 7, 2016

Office for Public Information
Dallas Police & Fire Pension System
4100 Harry Hines Boulevard, Suite 100
Dallas, Texas 75219

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When Will Richard Tettamant Pay for His Recklessness?

The FBI raid was in April. We're still waiting.

BY TIM ROGERS, PUBLISHED IN FRONTBURNER, OCTOBER 14, 2016



[Ed: This post was corrected. An earlier version incorrectly said that the pension had been raided by the FBI. In fact, a financial firm called CDK was raided. The firm had offices in the same building as the pension and had a cozy relationship with Tettamant.]

This morning, as I read the news that the Dallas Police and Fire Pension System is foundering and needs millions upon millions in taxpayer money to stay afloat, I thought of one man: Richard Tettamant. He's the guy who did this. There are others who are culpable for the mess we're in now — the junket-taking cops and firefighters who sat on the pension board over the years, the feckless City Council members who did the same — but Tettamant is the man. He was the head of the snake.

I spoke with someone this morning who closely watches the workings of the pension fund, and this person said the liability generated by its bad investments and shoddy accounting would bankrupt most cities. The pension wants a \$36 million life raft from the city right now; it soon could come asking for hundreds of millions more. This mess spills over into every corner of the city. Hiring more cops, fixing our third-world streets, building a 50-mile trail loop, funding arts groups, hiring a management team to run Fair Park — it is all put in jeopardy because of the pension mess. Oh, and the city-owned buildings. Our own Peter Simek recently used his house key to gain entrance to the DMA's art vault, because the elevators there are in such a sad state. Between the DMA and the Meyerson and everything else, the city has \$58 million in major maintenance needs at its cultural facilities. Good luck with that. Tettamant has likely torpedoed it all.

So let's briefly remind ourselves how we got here and then have a look at how Tettamant is faring these days, shall we?

Many, many years ago, the pension was run from an office in City Hall. Tettamant worked there. He was a city employee, and the city manager controlled his operating budget and how much office space he could have. Wanting more autonomy, Tettamant maneuvered to change the pension's operational structure, turning it into a pension *system*, and moving the thing into its own building on Harry Hines. Along the way, all those city employees had to be transitioned over; they became pension employees.

Tettamant had already worked so long for the city, though, that his personal pension remained with the Employee Retirement Fund, the city's civilian pension. So while he was buying \$20 million houses in Hawaii and taking nice trips to see how the pension's investments were holding up, his money was safe. As he made risky real estate investments all over the place, taking out variable-interest-rate loans from Japanese banks to build speculative projects, and then overvaluing the pension's holdings on its books, his money was safe.

It is entirely possible that in 2014, as it became increasingly clear that the pension he ran was in serious trouble and Tettamant stepped down, he was already drawing his pension from the much more stable and responsibly run Employee Retirement Fund. At that point, his salary was about \$370,000. Sweet deal if you can get it.

And today? According to his LinkedIn profile, Tettamant works as a senior advisor at a real estate investment firm called - wait for it- Ethika. The firm's site says the name comes from "Aristotle's most influential work, in which he states logic, perseverance, and goal-directed ethics are key principles in achieving success."

As we know, back in April the FBI raided the offices of a financial firm that had close connections to the pension and officed in the same building. I have a favor to ask of John R. Parker, the U.S. attorney for the Northern District of Texas. Please, when this thing finally goes to trial, ask Tettamant about Aristotle and goal-directed ethics.

In the meantime, I think every cop on the Dallas police force should be familiar with the name Tettamant. He doesn't live in Dallas. But surely his work for Ethika periodically takes him into the city whose first responders once entrusted their retirement money to him. Should he ever be pulled over, the cop who does so might wish to express his or her thanks.