



IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

DISTRICT COURT
FILED

DEC 22 2022

INTERNATIONAL ASSOCIATION OF
FIREFIGHTERS, LOCAL 176, a labor
organization,

Plaintiff,

v.

CITY OF TULSA, OKLAHOMA, a
municipal corporation,

Defendant.

DON NEWBERRY, Court Clerk
STATE OF OKLA. TULSA COUNTY

CV-2022-02613

KELLY M. GREENOUGH

PETITION

COMES NOW Plaintiff and for its claims and causes of action against Defendant states and alleges:

1. Plaintiff, International Association of Firefighters, Local 176, is the certified bargaining representative for all members of the fire department of Defendant, City of Tulsa, Oklahoma, which is a municipal corporation, except two.
2. On March 29, 2022, Plaintiff requested information from Defendant, to which it is entitled under both the Oklahoma Open Records Act, 51 O.S. § 24A.1 *et seq.*, and the Fire and Police Arbitration Act, 11 O.S. § 51-101 *et seq.*
3. Despite numerous follow-up requests for information and assurances from Defendant that the information would be forthcoming, documents have not been forthcoming. Defendant has had plenty of time to respond, which it has not.
4. As a result, Plaintiff has been denied records to which it is entitled.

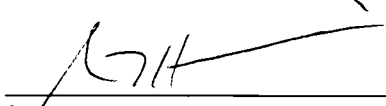
WHEREFORE, premises considered, Plaintiff prays that Defendant be ordered to produce the records requested, and further prays for attorneys' fees, costs, and such other and further relief to which Plaintiff is deemed entitled.

2022 DEC 22 12:55

Respectfully submitted,

FRASIER, FRASIER & HICKMAN, LLP

By:



Steven R. Hickman, OBA #4172
1700 Southwest Blvd.
Tulsa, OK 74107
Phone: (918) 584-4724
Fax: (918) 583-5637
E-mail: frasier@tulsa.com

29 March 2022

City Clerk
City of Tulsa
175 E 2nd Street
Tulsa, OK 74103

HAND DELIVERED

In re: Open Records Request/Information Request

Dear City Clerk:

Please be advised that this office represents IAFF, Local 176, and makes this request pursuant to the Oklahoma Open Records Act and also as an information request under the Fire & Police Arbitration Act.

Please let us review and copy (or forward copies to us) of the following City documents:

1. The COBRA letter formats from June, 2015, to present that the City utilizes has utilized. In this connection, it is noted that the typical COBRA letter not only explains to the employee/former employee the rights for continuation coverage, but also sets out the rates that the employee/former employee must pay to maintain the coverage, generally broken down as single, family, etc., at the employee's option.
2. Any documents related to any third-party contractors/administrators that administered or assisted in administering the City's COBRA obligations from June, 2015, to present, including, but not limited, contracts, correspondence between the City and the contractor(s), and documents showing payments to the contractor(s).
3. Documents related to the City relationship with Mashino, Hudelson & Associates from June, 2015, to present, including, but not limited to, contracts, correspondence to and from, and documentation of payments to said entity.
4. Documents related to the City relationship with Lockton Companies (or its subsidiaries) from June, 2015, to present, including, but not limited to, any contracts, correspondence to and from, and documentation of payments to said entity.

Please advise when such documentation has been collected and may be viewed or forward copies to this office.

Sincerely,

FRASIER, FRASIER & HICKMAN, LLP



By: Steven R. Hickman

SRH/vls
16-0056

cc: T. Michelle McGrew
City of Tulsa Legal Department
175 E 2nd Street, Suite 685
Tulsa, OK 74103
(By USPS)