

February 26, 2020

**VIA EMAIL & U.S. MAIL**  
**tgp@pelayes-yu.com**

Mr. Tristan G. Pelayes  
Law Offices of Pelayes & Yu  
10803 Foothill Blvd., Suite 112  
Rancho Cucamonga, CA 91730

**Re: *Mirna Cisneros and Karen Cervantes – Fact-Finding Investigation***  
**Client-Matter: SA030/018**

Dear Mr. Pelayes:

We understand that you were recently contacted by Carla Barboza, the investigator engaged by the City of San Bernardino to conduct a fact-finding investigation into the allegations set forth in the Government Claims for Damages filed by your office on February 13, 2020 on behalf of Mirna Cisneros and Karen Cervantes.

This letter will address the requests you made in your February 24, 2020 letter to Ms. Barboza. You requested “unlimited access to the completed investigation, [your] participation and input into any interviews conducted by [Ms. Barboza] on behalf of the City and waiver of the attorney client/work product privilege in connection with the investigation [Ms. Barboza was] hired by the City to do.”

The City has retained Ms. Barboza to conduct this investigation as an independent third party. The City has given Ms. Barboza, an attorney with recognized expertise in conducting workplace investigations, the discretion to investigate your clients’ allegations in the manner she sees fit, including determining what witnesses to interview and what documents to review. The City is not interfering in her conduct of the investigation and for that reason will not agree to your involvement either.

You did not respond to Ms. Barboza’s request for the names of witnesses that your clients believe have information related to their claims. In order to facilitate Ms. Barboza’s thorough investigation of your clients’ allegations, it is important for your clients, it would be very helpful if you could provide her with the information she requested. The Government Claims for Damages that you filed do not include specific names.

Mr. Tristan G. Pelayes

Re: *Mirna Cisneros and Karen Cervantes – Fact-Finding Investigation*

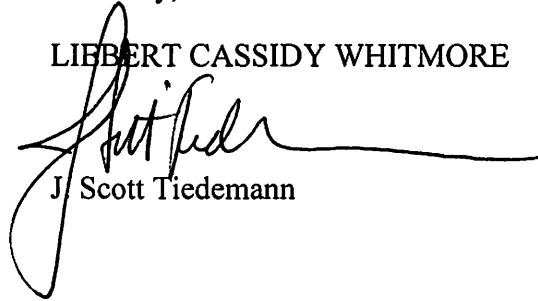
February 26, 2020

Page 2

Thank you in advance for your anticipated cooperation with the investigation.

Sincerely,

LIBBERT CASSIDY WHITMORE

A handwritten signature in black ink, appearing to read "J. Scott Tiedemann", with a long horizontal flourish extending to the right.

J. Scott Tiedemann

JST:jjb