

SECOND SUPPLEMENTAL PUBLIC RECORDS REQUEST

BOA 25-01 — System Access Records and Personnel-Permission Records

Submitted by:

Bryan Sanders
344 West 35th Street
Tucson, Arizona 85713
(520) 891-0610 | bransan@gmail.com

Submitted to:

City of South Tucson — City Clerk / Public Records Officer
1601 S. 6th Avenue
South Tucson, Arizona 85713

Date: May 15, 2026

Reference: Second Supplemental to the Public Records Request submitted on May 1, 2026 (the "May 1 PRR" / Items 1–42) and to the First Supplemental Public Records Request submitted on May 14, 2026 (the "May 14 PRR" / Items 43–72), each pertaining to South Tucson Board of Adjustment Case BOA 25-01. Date-stamped clerk copies of both prior requests have been retained by the requester.

Statutory authority: Arizona Public Records Law, A.R.S. § 39-121 *et seq.*

Format requested: Electronic, native format with original metadata preserved (see Section V). System logs in their native export format; rosters as native spreadsheets or, if not available natively, as PDF with searchable text.

I. Purpose of this request

This is a Second Supplemental Public Records Request to the City of South Tucson under A.R.S. § 39-121 *et seq.* It is submitted in addition to, not in place of, the May 1 PRR and the May 14 PRR. This Second Supplemental seeks records of a specific narrow category not directly covered by the prior two requests: **the personnel-access records and system-access records for the two publishing systems on which the City of South Tucson publishes its municipal code** — namely (a) the City's own website at *southtucsonaz.gov*, and (b) the City's contracted Municode publication at *library.municode.com/AZ/south_tucson*.

Documentary basis. Documentary research completed on May 15, 2026 establishes, with mathematical certainty (matching SHA-256 cryptographic hashes), that **Chapter 24 of the South Tucson Code is the only chapter that has been completely removed from the live Municode publication** of the City's code. Seventeen other chapters of the City Code are byte-identical between the August 5, 2025 archived Municode version and the current Municode publication. Contemporaneous documentary evidence — specifically, a March 3, 2026 email from a private resident to a sitting member of the South Tucson Board of Adjustment, and the sender's separate text-message account that as of that date Chapter 24 was "with the rest of the city code" (i.e., integrated within the Municode publication) and not separated as a standalone document — supports the conclusion that the removal of Chapter 24 from the live Municode publication occurred **after the BOA's February 25, 2026 vote on Case 25-01**. The records sought below would establish (a) the City Personnel who have access to either publishing system, and (b) the date and the identity of the person who effected the removal of Chapter 24 from the Municode publication and who uploaded the standalone Chapter 24 PDF currently hosted at *southtucsonaz.gov/media/8466*.

Posture. This request is factually neutral. It does not allege wrongdoing by any individual. It seeks records that the City of South Tucson is required to produce under the Arizona Public Records Law. Where individuals are identified by access permissions or audit-log entries, that identification is for documentary completeness only and does not constitute an allegation against the named individual.

II. Definitions

All definitions in Section III of the May 14 PRR are incorporated by reference. The following additional definitions apply to this Second Supplemental:

- **"The City Website"** means the public-facing website of the City of South Tucson at *southtucsonaz.gov*, including all subdomains, all hosted media at any /media/ path or other content-management-system path, and all backend administrative interfaces used to manage, upload to, or modify the contents of that site.
- **"The Municode Publication"** means the City of South Tucson's contracted municipal-code publication hosted by Municode at *library.municode.com/AZ/south_tucson*, including the current/live publication, all archived versions, the "Adopted Ordinances Not Yet Codified" list, and all backend administrative or publication-management interfaces used by the City or by Municode to add, modify, remove, or otherwise manage the contents of that publication.
- **"The Standalone Chapter 24 PDF"** means the file with the path *southtucsonaz.gov/media/8466* and the filename *zoning_code_ch024_2022.pdf*, together with any predecessor file at the same path or at any other path on the City Website that purported to be the City's published Chapter 24 (Zoning) at any time since January 1, 2024.
- **"City Personnel"** has the meaning given in the May 14 PRR and includes elected officials, appointed officials, employees, contractors, agents, consultants, and any other individual acting on behalf of the City of South Tucson, regardless of compensation status or device used.
- **"Access Permission"** means any account, credential, role, group membership, or other authorization granted by or on behalf of the City of South Tucson that permits an individual to view, upload, modify, replace, or remove any content on either the City Website or the Municode Publication, at any level of permission, including but not limited to admin, editor, author, contributor, publisher, content-manager, or read-only roles.

III. Records requested

The following items, numbered 73 through 78, continue the numbering sequence of the May 1 PRR and May 14 PRR.

73. Records identifying the City Personnel who uploaded the Standalone Chapter 24 PDF. All records, in any medium, identifying the City Personnel (by name, title, department, and user-account identifier) who uploaded each version of the Standalone Chapter 24 PDF to the City Website, and the circumstances of each such upload. This item includes, without limitation:

- Each filename, file size, file hash (if calculated), upload timestamp, and source IP address logged by the City Website's content-management system or hosting infrastructure;
- The user account, email address, role, and authentication method used to perform each upload;
- The source of the file uploaded (e.g., a local file from a specific City Personnel's workstation; a transfer from Municode or any other vendor; a transfer from a third party); and the chain of custody of the file from creation to upload;
- Any internal ticket, work order, request, email, text message, instruction, or other documentation that authorized, requested, or memorialized the upload;
- All upload-related records covering all versions of this file from January 1, 2024 to the date of this request.

74. Complete roster of City Personnel with Access Permission to the City Website. The complete current list of City Personnel holding any Access Permission to the City Website, including its content-management system, media library, and any related administrative interface. For each individual, the following information:

- Full legal name; title; department; date of hire (or contract-engagement start date) at the City of South Tucson;
- Date the Access Permission was granted; specific level of access (admin, editor, contributor, etc.); written role description if any;
- Identity of the City Personnel who authorized the Access Permission grant;
- Any documented training, signoff, acceptable-use agreement, or other documentation associated with the grant of access.

This item additionally includes former City Personnel whose Access Permission was active at any time since January 1, 2024 but has since been revoked or modified, together with the date and the identity of the revoking party.

75. Complete roster of City Personnel with Access Permission to the Municode Publication. The complete current list of City Personnel holding any Access Permission to the Municode Publication, including its publication-management backend, administrative interface, or any Municode-side user account associated with the City of South Tucson. For each individual, the same information specified in Item 74 above. This item additionally includes:

- All Municode-side user accounts associated with the City of South Tucson, regardless of which individual City Personnel uses or has used each account;
- All access logs for the Municode publication-management interface for the period from August 1, 2025 to the date of this request, including: the user account, the action performed, the timestamp, the affected chapter or section of the City Code, and the IP address logged;
- All records of City Personnel who at any time since January 1, 2024 had access to the Municode Publication's publication-management interface but no longer do, together with the date and the identity of the revoking party.

76. Permission grants, revocations, and modifications. All records of grants, revocations, or modifications of Access Permission to either the City Website or the Municode Publication, since January 1, 2024. For each such action, the following information:

- Date and time of the action; affected individual; specific system affected; previous level of access; new level of access;
- Identity of the City Personnel who authorized the action; any approval documentation, email, memo, work order, or ticket associated with the action;
- The reason or circumstance for the action, if documented.

77. Vendor contracts, statements of work, and service-level agreements. All current and prior vendor contracts, statements of work, service-level agreements, master service agreements, and any change orders or amendments thereto, between the City of South Tucson and (a) the vendor(s) providing the City Website's content-management system, hosting, or web-development services, and (b) Municode (and any predecessor or successor municipal-code-publishing vendor, including Munipodes), for the period from January 1, 2024 to the date of this request. This item additionally includes all communications between the City and either category of vendor concerning the provisioning, modification, or revocation of Access Permission under any such contract.

78. Litigation-hold preservation notice. The City of South Tucson is hereby formally requested to **preserve all records responsive to Items 73 through 77 above**, including all system logs, audit trails, access-control records, and vendor communications that may otherwise be subject to automatic retention or destruction schedules. This preservation request applies to records in all media and on all devices and systems, regardless of custodian. The requester respectfully asks that the City confirm, as part of its response to this request, the date the litigation hold was implemented, the custodians and systems covered, and the scope of the hold.

IV. Privilege log requirement

If the City withholds any record or portion of a record responsive to this request on the basis of any claimed privilege or statutory exemption, the requester requests a privilege log that identifies, for each withheld record: the date; the author; all recipients; the general subject matter; the specific privilege or exemption claimed; and a sufficient description for the requester to evaluate the claim. A record will not be treated as withheld if it is not identified in a privilege log.

The requester notes that under Arizona law (A.R.S. § 39-121.01(D)(2)), attorney-client privilege as asserted by a public body is narrowly construed and does not cover factual information, the identities of parties consulted, or records that form the basis of agency action. System logs, access rosters, vendor contracts, and audit trails are presumptively non-privileged.

V. Format and production

- Records produced in their native electronic format with original metadata preserved, wherever the native format is available.

- System access logs in their native export format (e.g., CSV, JSON, XML, or vendor-specific format), not flattened to PDF unless no native format exists.
- Personnel rosters as native spreadsheets (e.g., XLSX or CSV) or, if not natively available in spreadsheet form, as PDF with searchable text.
- Vendor contracts as native PDF or Word documents, with all attachments, amendments, and exhibits.
- Email communications in their native format (e.g., .eml, .msg) with all attachments preserved and all headers intact.
- Where redactions are made, the redactions must be applied in a manner that preserves the underlying record (i.e., redacted-image overlay, not text deletion) and the specific statutory or other basis for each redaction must be identified in the privilege log required under Section IV.

VI. Statutory deadlines and follow-up

Under A.R.S. § 39-121.01, the City of South Tucson is required to promptly furnish records in response to a public-records request. The requester respectfully asks for a substantive response within **ten (10) business days** of receipt of this request, even if that response is a rolling production or a written statement of the production schedule. Records that the City contends are not promptly available, or that require additional time to produce, should be identified specifically along with an estimated production date for each.

If the City contends that any item in this request is overly broad, unduly burdensome, or otherwise objectionable, the requester is available to discuss narrowing or refining scope to obtain the underlying information without imposing undue burden on the City. Contact information is at the end of this request.

The requester reserves all rights under A.R.S. § 39-121 *et seq.*, including the right to seek special-action review under A.R.S. § 39-121.02 if records are improperly withheld or production is unreasonably delayed.

VII. Coordination with prior PRRs

To the extent that records responsive to Items 73 through 77 above have already been produced (or are in the process of being produced) under the May 1 PRR or the May 14 PRR, the City may satisfy the corresponding items by cross-reference, identifying the specific item under the prior PRR and the records produced thereunder. The requester's intention is not to require duplicative production of the same records, but to ensure that the specific personnel-access and system-access records described in this Second Supplemental are covered in some form.

This request is submitted in good faith and in the public interest, consistent with the Arizona Public Records Law's foundational principle that the records of public bodies are presumptively open to public inspection. The requester is a private homeowner residing within the 300-foot statutory notice radius of the parcel at 2425 South 10th Avenue and has standing under Arizona law to make this request. No commercial use of the records is contemplated.

Respectfully submitted,

Bryan Sanders
344 West 35th Street · Tucson, Arizona 85713
(520) 891-0610 · bransan@gmail.com
May 15, 2026