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September 21, 2026

Office of the City Attorney
City Attorney Charline Gipson
City of New Orleans
1300 Perdido Street
New Orleans, LA 70112
Via E-mail charline.gipson@nola.gov

Re: Public Records Request Directed to Mayor Helena Moreno, City Council President Jean-Paul “JP” Morrell, City Council Vice President Matthew Willard, and Council Members Aimee McCarron, Freddie King, III, and Jason Hughes, Each in Her/His Official Capacity and as a Listed Victim in the Indictment, and to Andrew Tuozzolo, Special Counsel to Mayor Helena Moreno, in His Official Capacity

CNO Request # 26-20204; uploaded September 21, 2026

City Attorney Gipson:

Please accept this correspondence as official notice that a request has been made for records by Blake Arcuri pursuant to Louisiana's Public Records Act, La. R.S. 44:1, et seq., directed to Mayor Helena Moreno, City Council President Jean-Paul “JP” Morrell, City Council Vice President Matthew Willard, and Council Members Aimee McCarron, Freddie King, III, and Jason Hughes (collectively, the “City Officials”), each in her or his official capacity and as an alleged victim in the Indictment, and to Andrew Tuozzolo, Special Counsel to Mayor Helena Moreno, in his official capacity (together with the City Officials, the “Recipients”). This correspondence is sent on behalf of Mr. Arcuri, an individual citizen domiciled in the city of New Orleans. We received an acknowledgement this morning that the request was received and you have been forwarded the email confirming that, “[y]our record request #26-20204 has been submitted successfully.”

On behalf of Mr. Arcuri, I ask for confirmation that each Recipient will respond within the statutory delays provided by law. This request covers the period from June 1, 2026 (the date of Laurie White's appointment as Special Prosecutor) through the present, unless a request below states otherwise, and seeks records concerning State of Louisiana v. Elizabeth Baker Murrill, No. 701870, Criminal District Court for the Parish of Orleans (the “Case”), the Grand Jury proceedings that led to the Indictment, and the letter of July 21, 2026 requesting dismissal of the Indictment (the “July 21 Letter”).

Mr. Arcuri has requested the following records from each Recipient:

- 1) Any and all communications, however transmitted — including but not limited to e-mail, text message, instant message (including but not limited to iMessage, Google Fi messaging, WhatsApp, or Signal), telephone call, voicemail, letter, or memorandum — between the Recipient (or any staff, aide, assistant, or employee acting on her or his behalf) and Special Prosecutor Laurie White, or anyone acting on her behalf, concerning the Case.
- 2) Any and all communications between the Recipient (or staff acting on her or his behalf) and District Attorney Jason Williams, or any employee of the Orleans Parish District Attorney's Office, concerning the Case.
- 3) Any and all subpoenas, subpoenas duces tecum, or other compulsory process issued to, served upon, or received by the Recipient in connection with the Grand Jury proceedings, together with any return of service, cover letter, or accompanying instructions, regardless of whether the name of Attorney General Elizabeth Baker Murrill appears on the face of the subpoena or has been omitted, redacted, or altered from any version of it.
- 4) Any and all communications requesting, instructing, or arranging for the Recipient to appear, testify, or otherwise participate as a witness before the Grand Jury, and any documents reflecting the date(s) and time(s) of any such appearance.
- 5) Any and all communications concerning parking, building access, drivers, escorts, or other logistical or special accommodations arranged in connection with any appearance by the Recipient at the Orleans Parish Criminal District Court or before the Grand Jury.
- 6) The July 21 Letter, together with any and all prior or subsequent drafts, revisions, or edited versions of it, and any comments, redline edits, or mark-ups made by any person on any version of it.
- 7) Any and all communications concerning the drafting, review, approval, or coordination of the July 21 Letter, including communications among any of its six signatories, their respective staff, or outside counsel.
- 8) Any and all communications reflecting who proposed, requested, or directed that the July 21 Letter be sent, and when that proposal or request was first made.
- 9) Any and all communications between the Recipient (or anyone acting on her or his behalf) and the Special Prosecutor (or anyone acting on her behalf) concerning the July 21 Letter, its contents, its timing, or the dismissal it requested, whether occurring before, contemporaneous with, or after July 21, 2026.

- 10) Any and all communications supporting, discussing, drafting, or otherwise relating to the statement in the July 21 Letter that its signatories “did not conspire or coordinate in any way with the District Attorney, the grand jury, or you as Special Prosecutor.”
- 11) Any and all communications supporting, discussing, drafting, or otherwise relating to the statement in the July 21 Letter that its signatories “were not intimidated” by the correspondence underlying the Indictment, including but not limited to any communications concerning any contradiction, inconsistency, or change between testimony or statements the Recipient gave to the Grand Jury or Special Prosecutor regarding intimidation and the Recipient's subsequent position, in the July 21 Letter or otherwise, that she or he was not intimidated.
- 12) Any and all communications reflecting whether the Recipient, or anyone acting on her or his behalf, reported or was asked to report the conduct underlying the Indictment to any law enforcement agency or prosecutorial authority, consistent with or contrary to the statement in the July 21 Letter that its signatories “did not report the alleged crime to law enforcement or anyone with prosecutorial authority.”
- 13) Any and all communications between the Recipient (or any member of her or his communications, press, social media staff, or any other staff) and any member of the news media, anyone associated with the news media, any legal commentator, any social media influencer or person who operates a social media page, or any member of any communications team concerning the Case, the July 21 Letter, or the dismissal of the Indictment.
- 14) Any and all communications, on or after June 1, 2026, addressing, discussing, or reconsidering the Recipient's position on whether the correspondence underlying the Indictment, or any other conduct alleged in it, warranted prosecution.
- 15) Any and all calendar entries, scheduling communications, or appointment records reflecting meetings, calls, or appearances related to the Case or the Grand Jury proceedings.
- 16) Any and all e-mails, sent or received, to or from any e-mail address the Recipient utilizes, operates, or controls, whether an official city.gov-type account or a personal account, concerning the Case.
- 17) Any and all text messages or other electronic messages, sent or received on any device or account the Recipient utilizes, operates, or controls, whether an official device or a personal device, concerning the Case.

- 18) To the extent any Recipient contends that any record responsive to this request is exempt from disclosure, an itemized privilege log identifying each such record and the specific statutory basis relied upon for withholding it, as required by La. R.S. 44:32(D).

Please be advised that the Public Records Act imposes no requirement that a requester confine a request for records to any particular number or list of search terms, keywords, or phrases. Previous requests made to your office were unlawfully closed pursuant to such demands. The obligation to conduct a reasonably diligent search calculated to locate all records responsive to the requests above rests with the custodian; La. R.S. 44:32(A) permits a custodian to seek reasonable clarification of an unclear request, but does not permit a custodian to condition, limit, or deny production on the requester's willingness to supply a narrowed set of search terms. Each request above should accordingly be read broadly, according to its plain terms, and searched using whatever terms, date ranges, custodians, and search methodology are reasonably necessary to identify all responsive records — not merely those that happen to contain any specific word or phrase this office may have used elsewhere in describing the subject matter.

Please produce all responsive records within the statutory delays provided by law. If any Recipient contends that a particular request is overly broad or unduly burdensome, we ask that your office confer with the undersigned regarding a reasonable narrowing of scope, as required by La. R.S. 44:32(A)(2), rather than declining to produce responsive records in their entirety.

Should you have any questions or concerns, please do not hesitate to contact me.

Respectfully submitted,

/s/ Laura Cannizzaro Rodrigue

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