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Executive Pool Administrator/Chief Insurance Services Officer: William L. Hamilton

June 25, 2009

Ms. Linda Blackford
Lexington Herald Leader
100 Midland Avenue
Lexington, KY 40508-1999

Dear Ms. Blackford:

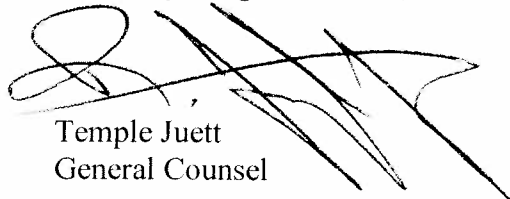
The following information is being provided in response to your request for information under the Kentucky Open Records Act which was received in our office on Wednesday, June 17, 2009.

As stated in our previous responses to numerous requests for information by the Herald Leader, the Kentucky League of Cities, Inc., ("KLC") maintains the position that as a non-stock, non-profit, corporation which offers membership services for a fee, it is not a public agency under the provisions of the Kentucky Open Records Act. In the past, we have voluntarily agreed to make information available to the Herald Leader in an effort to promote a complete understanding of the organization's operations and structure. Unfortunately, this has led to the publication of several statements which purport to question the applicability of the Kentucky Open Meetings and Open records Acts to the KLC, based in part on the mere fact that records have been voluntarily produced and meetings voluntarily opened. We must now, therefore, formally assert the position that the KLC is not a public agency and not subject to the Kentucky Open Records Act. In the event of disagreement, this will allow the proper authority to make a determination. Therefore, there will be no further disclosure of documents on a voluntary basis.

In addition, it is important to note that even assuming that the Open Records Act applies, the documents requested are proprietary in nature, and therefore exempt from disclosure under KRS 61.878(1)(c)(1).

Sincerely,

Kentucky League of Cities, Inc.



Temple Juett
General Counsel