

Joe R. Lane (1858-1931)
Charles M. Waterman (1847-1924)
Richard A. Davidson
Michael P. Byrne
Theodore F. Olt III
Judith L. Herrmann
Joseph C. Judge
Jason J. O'Rourke
Mikkie R. Schiltz
Diane E. Puthoff
Wendy S. Meyer
Ian J. Russell
Benjamin J. Patterson
Douglas R. Lindstrom, Jr.
Abbey C. Furlong
Samuel J. Skorepa
Kurt P. Spurgeon
Joshua J. McIntyre
Brett R. Marshall
Timothy B. Gulbranson
Alexander C. Barnett
Eric M. Hartmann
Maegan M. Gorham^
Grace E. Mangieri
David C. Waterman
Jenny L. Juchring
Jessica Y. Kirkpatrick**
Samuel P. Cropper
Nicolas B. Yost
Victoria L. Biggerstaff

LANE & WATERMAN LLP
ATTORNEYS AT LAW SINCE 1854

220 North Main Street, Suite 600
Davenport, Iowa 52801-1953
Telephone (563) 324-3246
Fax (563) 324-1616

Writer's Direct Dial: (563) 333-6630
E-Mail Address: bmarshall@l-wlaw.com
www.L-WLaw.com

November 30, 2023

VIA EMAIL & REGULAR MAIL

Grace E. Tobin
Jonathan L. McGehee±±

Registered Patent Attorney
Kathryn E. Cox±*


Of Counsel
Thomas N. Kamp*
C. Dana Waterman III*
James A. Mezvinsky*
David A. Dettmann*
Terry M. Giebelstein
Robert V. P. Waterman, Jr.
R. Scott Van Vooren
Edmund H. Carroll
Diane M. Reinsch*
Jeffrey B. Lang
Kyle R. Day

Admitted in Iowa and Illinois

* Only Admitted in Iowa
** Admitted in California
± Admitted in Florida
±± Only Admitted in Illinois
^ Admitted in Missouri

Illinois Office
3551 7th Street, Suite 110
Moline, IL 61265

Ms. Corrin Spiegel


corri.spiegel@davenportiowa.com


Dear Ms. Spiegel:

As you know we represent the City of Davenport. Due to the sensitive nature of the claims you have asserted against the City and the potential conflict of interest that may arise through your continued employment, I have advised the City to continue your paid leave until your agreed upon separation.

In furtherance of this action and beginning on December 1, 2023, I have instructed the City to remove all administrative privileges related to your employment, including email access and key card access to the City's facilities. We will place an out of office message on your City email account, and all emails will be redirected to Mallory Merritt, the City's acting administrator. If you have any items of personal property in your office that you would like returned, we will collect these items and make them available to you at our offices. Additionally, any personal property in your possession belonging to the City should be immediately returned, including laptops, phones, key cards, and all City records of any kind. Please contact me to make arrangements to deliver this property to me at our offices. Please contact me with questions.

Sincerely,

LANE & WATERMAN LLP

By 

Brett R. Marshall



Corri Spiegel [REDACTED]

City of Davenport

Corri Spiegel [REDACTED]
To: bmarshall@l-wlaw.com

Fri, Dec 1, 2023 at 10:06 AM

Mr. Marshall,

Please consider this email as an acknowledgment of your letter.

Given that the letter is inconsistent with the mutually agreed terms reached in my separation agreement, I would request that Lane and Waterman on behalf of the City arrange a courier to pick up the keys and wireless device that remains in my possession. I have no other City property, nor do I have any personal effects to retrieve.

I would request that as part of removing my access, the City immediately remove my presence from all locations on the City website in addition to social media access to City accounts.

Further, the City needs to make available the Benefits Manager to ensure a smooth transition of my benefits as required by the separation agreement. Please advise who I should coordinate with to ensure that meeting occurs in mid-December.

Additionally, I would request that the same arrangements be made associated with the wire transfer instructions which have not yet been completed.

Corri



Corri Spiegel <[REDACTED]>

FOIA Request

Marshall, Brett <BMarshall@l-wlaw.com>
To: Corri Spiegel <[REDACTED]>

Fri, Dec 15, 2023 at 4:18 PM

Ms. Spiegel,

Thank you for the response. Are you saying you do not have a copy of the settlement letter you gave to Mr. Warner to present to the City? As I mention below, the City cannot locate a copy of this letter, and I am specifically requesting a copy for the City's records.

Brett

Brett R. Marshall

LANE & WATERMAN LLP
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220 North Main Street, Suite 600
Davenport, Iowa 52801
Tel: 563.333.6630

Fax: 563.324.1616

Email: bmarshall@L-WLaw.com
www.L-WLaw.com

From: Corri Spiegel <[REDACTED]>
Sent: Friday, December 15, 2023 3:48 PM
To: Marshall, Brett <BMarshall@L-WLAW.com>
Subject: Re: FOIA Request

Mr. Marshall,

I possess no texts responsive to this request, nor did any ever exist.

Any other items associated with this request should be in the City's possession via email, electronic file, or paper copy.

As a follow-up to my December 1, 2023 email, I am still waiting for the City to comply with the terms outlined in sections 6 and 7 of the separation agreement. Based on media coverage, it is my understanding that the agreement was ratified by the City Council on Wednesday evening. Given that the holidays are quickly approaching, and there are very specific deadlines associated with section 6, I am becoming concerned that there has been no attempt to facilitate arrangements.

On Fri, Dec 15, 2023 at 10:20 AM Marshall, Brett <BMarshall@l-wlaw.com> wrote:

Ms. Spiegel,

The City has received an open records request for the following documents:

1. Any records related to Corri Spiegel's departure from the City of Davenport since July 1 including emails, memos, letters, and text messages related to Ms. Spiegel's separation, settlement, transition, or other form of departure from city employment. Please include any emails in the trash or deleted items folder(s).
2. Any separation or settlement requests from Corri Spiegel or an agent representing Corri Spiegel.

Can you let me know whether you have any responsive documents, specifically relevant text messages and a separation/settlement request. I note that the City cannot locate a copy of your written settlement request, so please send me a copy of that with any other responsive documents. Obviously not all documents are subject to disclosure, but we need to evaluate any and all potentially responsive documents. Thanks.

Brett

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Corri Spiegel <[REDACTED]>

FOIA Request

Corri Spiegel <[REDACTED]>
To: marion.meginnis@davenportiowa.com, rick.dunn@davenportiowa.com

Sat, Dec 16, 2023 at 9:50 AM

Alderwoman Meginnis and Alderman Dunn,

I apologize for reaching out to you with this issue, but at this juncture, I don't know where else to turn. I was up all night, unable to sleep after receiving this series of emails. You were there with me after the hearing on the evening of September 7th, and what you will find below has me feeling equally violated.

I tried to conclude our separation with professionalism and respect, and we are now eight business days from January 2nd. The City has not communicated with me in any form since I received a letter from outside counsel on November 30th essentially terminating me. I heard absolutely nothing after that day, until outside counsel again emailed me on December 12th to advise your agenda was being revised with the ratification item. Since your vote, no one has reached out to me to make arrangements. Instead, your outside counsel has attempted to intimidate me, while not responding to my requests to finalize the remaining transactional items.

I am unsure why I am being treated this way when I did everything that was asked of me between October 6th and November 17th. Any assistance you can provide to bring this issue to a resolution would be greatly appreciated, as I think we would all like to be able to close the chapter and move on.

Again, I am very sorry to do this, especially with the holidays nearing, but I am out of options that allow this to remain amicable.

Corri

----- Forwarded message -----

From: **Marshall, Brett** <BMarshall@l-wlaw.com>
Date: Fri, Dec 15, 2023 at 4:18 PM
Subject: RE: FOIA Request
To: Corri Spiegel <[REDACTED]>

Ms. Spiegel,

Thank you for the response. Are you saying you do not have a copy of the settlement letter you gave to Mr. Warner to present to the City? As I mention below, the City cannot locate a copy of this letter, and I am specifically requesting a copy for the City's records.

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Email: bmarshall@L-WLaw.com
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From: Corri Spiegel <[REDACTED]>
Sent: Friday, December 15, 2023 3:48 PM
To: Marshall, Brett <BMarshall@L-WLAW.com>
Subject: Re: FOIA Request

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Corri Spiegel [REDACTED]

FOIA Request

Corri Spiegel <[REDACTED]>
To: "Marshall, Brett" <BMarshall@l-wlaw.com>

Sun, Dec 17, 2023 at 5:28 PM

Mr. Marshall,

Given the nature and tone of the correspondence that has been received thus far, all remaining communication will need to occur in written form.

My financial institution advises against transmitting wire instructions through non-secure electronic means. I will make arrangements on Monday to retrieve the form that they have stored securely at the branch and have it delivered to the Lane and Waterman offices on Tuesday morning.

The outstanding financial terms of the agreement include:

Date	Payment Type	Taxation Status	Payroll Hours x Rate	Contract Amount	Method of Delivery
12/29/2023	Standard Payroll	Normal Employment	80*\$121.97 ADMLV		Direct Deposit
1/2/2024	SA-Payment B	Not subject to employment taxes	N/A	\$1,000,000	Wire Transfer
1/12/2024	Final Payroll	Normal Employment	32*\$121.97 ADMLV 24*\$121.97 HOL		Direct Deposit
1/12/2024	SA-Payment A	Normal Employment	N/A	\$600,000	Direct Deposit

Note: If your client desires to make Separation Agreement Payment A via wire transfer instead of direct deposit, that is an accommodation I am willing to make.

Further, please advise if your client is waiving the requirements included in Administrative Policy 1.4 provision 3.

Given that my benefits should remain in current standing through January, you can have Human Resources direct any paperwork that I will need to complete for the remainder of 2024 to either this email address or my residence.

Corri

On Sat, Dec 16, 2023 at 2:58 PM Marshall, Brett <BMarshall@l-wlaw.com> wrote:
Ms. Spiegel,

If you want to schedule a call for Monday we can discuss the payments due under your agreement. In the meantime, if you want to send me wire instructions for the account you want the funds to go to that would be helpful. Thanks.

Brett
Sent from my iPhone

On Dec 15, 2023, at 3:48 PM, Corri Spiegel <[REDACTED]> wrote:

Mr. Marshall,

I possess no texts responsive to this request, nor did any ever exist.

Any other items associated with this request should be in the City's possession via email, electronic file, or paper copy.

As a follow-up to my December 1, 2023 email, I am still waiting for the City to comply with the terms outlined in sections 6 and 7 of the separation agreement. Based on media coverage, it is my understanding that the agreement was ratified by the City Council on Wednesday evening. Given that the holidays are quickly approaching, and there are very specific deadlines associated with section 6, I am becoming concerned that there has been no attempt to facilitate arrangements.

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Can you let me know whether you have any responsive documents, specifically relevant text messages and a separation/settlement request. I note that the City cannot locate a copy of your written settlement request, so please send me a copy of that with any other responsive documents. Obviously not all documents are subject to disclosure, but we need to evaluate any and all potentially responsive documents. Thanks.

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Corri Spiegel <[REDACTED]>

FOIA Request

Marshall, Brett <BMarshall@l-wlaw.com>
To: Corri Spiegel <[REDACTED]>

Mon, Dec 18, 2023 at 2:02 PM

Ms. Spiegel,

Please complete the attached W-9 and email the completed form back to me. Alternatively, you can drop it off with the wire instructions if you are more comfortable with that. Thanks.

Brett

Brett R. Marshall

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Email: bmarshall@L-WLaw.com
www.L-WLaw.com

From: Marshall, Brett
Sent: Monday, December 18, 2023 11:52 AM
To: Corri Spiegel <[REDACTED]>
Subject: RE: FOIA Request

Thank you. As soon as I receive the wire instructions I will provide them to the City for the January 2 payment. I understand the other payments will occur per usual practice.

Brett

Brett R. Marshall

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Email: bmarshall@L-WLaw.com
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From: Corri Spiegel <[REDACTED]>
Sent: Monday, December 18, 2023 7:23 AM
To: Marshall, Brett <BMarshall@L-WLAW.com>
Subject: Re: FOIA Request

I didn't include the vacation and holiday accrual balance payouts in the original table, so I have prepared an amended one:

Date	Payment Type	Taxation Status	Payroll Hours x Rate	Contract Amount	Method of Delivery
12/29/2023	Standard Payroll	Normal Employment	80*\$121.97 ADMLV		Direct Deposit
1/2/2024	SA-Payment B	Not subject to employment taxes	N/A	\$1,000,000	Wire Transfer
1/12/2024	Final Payroll	Normal Employment	32*\$121.97 ADMLV 24*\$121.97 HOL		Direct Deposit
1/12/2024	SA-Payment A	Normal Employment	N/A	\$600,000	Direct Deposit
1/12/2024	Final Payroll- Accrual Balances	Normal Employment	280*\$121.97 VAC 3*\$121.97 HOL		Direct Deposit

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1/12/2024	SA-Payment A	Normal Employment	N/A	\$600,000	Direct Deposit

Note: If your client desires to make Separation Agreement Payment A via wire transfer instead of direct deposit, that is an accommodation I am willing to make.

Further, please advise if your client is waiving the requirements included in Administrative Policy 1.4 provision 3.

Given that my benefits should remain in current standing through January, you can have Human Resources direct any paperwork that I will need to complete for the remainder of 2024 to either this email address or my residence.

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