

**Paul Giuffre**

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**From:** Paul Giuffre  
**Sent:** Wednesday, June 19, 2019 5:31 PM  
**To:** 'Justins@weleski.com'  
**Subject:** Fox Chapel Area School District

Justin,

As I indicated I am the solicitor to the Fox Chapel Area School District. I am writing to follow-up on our telephone conversations regarding document bins from the Fox Chapel Area School District Administrative Offices.

To briefly summarize, your company was scheduled to pick-up and shred documents from the Fox Chapel Area School District Administrative Offices the week of June 17th. Consistent with normal practices involving the FCASD, you had received a call (or possibly an email) from "Liz" at the administrative offices scheduling pick-up of document bins. When we spoke, you were unsure of the date of Liz's request, but, if necessary, thought you might be able to determine that date. (At this time, I do not think it is necessary for you determine the date or manner of her contact with you but would ask that you maintain any record or note of her contact with you regarding the bins in question.)

The document bins were picked-up as scheduled but were not initially shredded. The documents were not shredded because a man, identifying himself as a representative of the district named "Arnold", appeared at your main facility and advised that the bins possibly contain documents that were not to be shredded. He directed your company to "hold off". On that basis, the documents were not shredded but were to be retained in a secure area of one of your facilities. Until my call to you, your company received no other calls or had no other discussions regarding these documents.

During our initial conversation, I indicated that the documents should not be shredded but should be securely stored until further direction from me. You indicated that you would take reasonable steps to maintain the confidentiality of the documents and would not permit anyone access to the documents until further instructed by me on behalf of the district. Shortly after our first conversation, you called me back to tell me that the documents in the bins in question had been shredded prior to our first conversation.

As I told you there is no one named Arnold who would have authority to view the documents, order their destruction, or direct your company to not shred the documents as you were initially instructed by the district to do. For this reason, I would appreciate any additional information your company might have regarding the individual who appeared at the main facility. If the facility at which the person appeared has surveillance or other cameras, I would ask that any depictions of "Arnold" be maintained.

Thank you,

Paul

Paul J. Giuffre, Esquire  
[paul@giuffrelawoffice.com](mailto:paul@giuffrelawoffice.com)



221 Commercial Avenue, Suite 200  
Pittsburgh, Pennsylvania 15215

412-781-7900 (P)  
412-781-7901 (F)

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