

City of Detroit
Water & Sewerage Department
Michigan Freedom of Information Act (FOIA)
Request for NON-POLICE RECORDS



Please note that failure to complete certain fields on this form may result in a denial of your request.

1. Today's date: 09/13/2021
2. Individual making this request: ALAN D. PENSKAR, ESQ., COUNSEL FOR NORMANDY APARTMENTS CA
3. Street Address: THE MEISNER LAW GROUP, P.C. 30200 TELEGRAPH ROAD, SUITE 467
4. City/State/Zip: BINGHAM FARMS, MI 48025
5. Telephone number: 810-730-8916 (DIRECT) Fax number: (248) 644-2941
6. Your client or insured (optional): NORMANDY APARTMENTS CONDOMINIUM ASSOCIATION
7. Description of the record: 999-0177.300 (DRAINAGE SERVICE ACCOUNT)
8. Date and time or time period, if applicable: 01/01/2018 - 09/01/2021 (except for Request #13)
9. Any other information that will assist in locating the requested record:
NA

Signature: _____

- NOTE:**
- 1) Failure to complete this form may result in a denial of your request.
 - 2) If the request is too broad, depending on the description of your request, we may deny your request; or request that you submit a deposit payment, prior to searching for the requested record.
 - 3) Medical record requests (e.g., EMS run sheets or billings) must comply with HIPAA and the Michigan Medical Records Access Act.

HAND-DELIVER OR MAIL THIS REQUEST TO:

Detroit Water & Sewerage Department
Office of General Counsel
735 Randolph St.
Suite 901
Detroit, Michigan 48226-3437

ATTACHMENT TO FOIA REQUEST FOR NON-POLICE RECORDS

Re: 999-0177.300 (Drainage Service Account)

Normandy Apartments Condominium Association (hereinafter "Normandy")

1. Produce any and all documents that support the DWSD's determination that the Parcel(s) for which it now seeks allegedly delinquent payments for drainage charges satisfy(ies) all criteria set forth in the "Drainage Charge Applicability" section of its "Drainage Program Guide".
2. Produce any and all documents that DWSD relies upon that the parcel(s) being charged against Normandy "contains 0.02 or more acres of impervious surface(s)".
3. Produce any and all documents that reflect whether DWSD has granted Normandy any "reduced drainage charges" for any reasons, including, but not limited to, direct runoffs to the Detroit and/or Rouge Rivers.
4. Produce any and all documents that reflect whether DWSD has determined if Normandy is eligible for "Green Credits" as set forth in the "Drainage Program Guide".
5. With respect to the "Parcel Ownership Information" section of the DWSD "Drainage Program Guide", produce any and all documents that reflect why the billings to Normandy were not sent for the previous three (3) years to the same address attached to the "existing water and sewer account" between Normandy and DWSD.
6. Produce any and all documents that DWSD relied upon for mailing the drainage billings for Normandy to 2599 W. McNichols Road, Detroit, MI 48221 since June, 2018.
7. Produce any and all documents that substantiate the basis for those charges now sought by DWSD for drainage charges for the prior three (3) years.
8. Produce any and all documents that evidence why the billings for drainage charges currently sought by DWSD were sent to the incorrect address initially, and throughout the subsequent three (3) years.
9. With respect to Table 1 of the "Drainage Program Guide", produce any and all documents that identify which category DWSD assigned to Normandy, and any and all documents that support its categorization of Normandy.
10. Produce any and all documents that reflect any payments made toward those certain billings sent to (the address(es) identified in paragraph 8) during the preceding three (3) years.
11. Produce any and all documents that reflect any receipt of those billings sent to (from the addressee(s)) to whom the billings were sent during the preceding three (3) years.
12. Produce any and all documents that reflect any disputes to those billings to which DWSD now seeks payment from Normandy during the preceding three (3) years.
13. Produce any and all billings for drainage charges sent to Normandy between January 1, 2015-December 31, 2017.
14. Produce any and all billing/service agreement(s), or equivalent documents, executed by and between DWSD and Normandy for drainage services.
15. Pursuant to page 19 of DWSD's "Guide to the Drainage Charge", produce any and all documents evidencing whether DWSD did ever "distribute drainage charges among" the individual owners of the condominiums within Normandy.