

## **PUBLIC ENTITY PROPERTY DENIES BLANKET REQUEST FOR RECORDS THAT WOULD REQUIRE UNREASONABLE EXPENDITURE OF RESOURCES AND TIME**

June 2, 2009 | Law Alerts

*Arpaio v. Davis, et al.*

Ct. Appeals, Div. One, June 2, 2009

Authored by the [JSH Appellate Team](#)

Sheriff Arpaio made judicial records requests to the Maricopa County Court Administrator requesting thousands of random unidentified emails and documents sent to or from certain individuals, within a range of dates. The Administrator contended that the search for random, unidentified emails and documents would have created a financial burden and substantially interfered with the operations of the Court. The Administrator denied the requests due to their lack of specificity, citing Supreme Court Rules 123(f)(p) and 123(f)(4)(A). The Sheriff filed a Formal Request for Administrative Review with the court. The trial court upheld the Administrator's decision.

The Court of Appeals affirmed. The benefits of public disclosure must yield to the burdens imposed on the government. The trial court did not abuse its discretion in denying all-inclusive, blanket requests for information that would have required an unreasonable expenditure of resources and time.