

1 Emi Young (SBN 311238)  
2 eyoung@aclunc.org  
3 Avram Frey (SBN 347885)  
4 afrey@aclunc.org  
5 ACLU FOUNDATION OF NORTHERN CALIFORNIA  
6 39 Drumm Street  
7 San Francisco, CA 94111  
8 Telephone: (415) 621-2493  
9 Facsimile: (415) 255-1478

10 *Counsel for Petitioner/Plaintiff ACLU of Northern*  
11 *California*

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **COUNTY OF SOLANO**

14 AMERICAN CIVIL LIBERTIES  
15 UNION OF NORTHERN  
16 CALIFORNIA,

17 Petitioner/Plaintiff,

18 v.

19 VALLEJO POLICE DEPARTMENT,

20 Respondent/Defendant.

CASE NO. FCS059257

**PETITIONER'S BRIEF ON REMAND RE.  
OFFICER NAME REDACTIONS AND  
DISCLOSURE OF DRAFT REPORTS**

Judge: Hon. Stephen Gizzi

Department: 3

Hearing date: January 7, 2026

Action filed: November 22, 2022

1 This case comes before the Court on remand from the Court of Appeal, following its  
2 decision that the “records the ACLU seeks are generally subject to public disclosure under [Penal  
3 Code] section 832.7, subdivision (b)(1)(A)(i).” (*City of Vallejo v. Superior Court* (2025) 112  
4 Cal.App.5th 565, 597 [hereafter “Appellate Op.”].) The Parties have met and conferred and  
5 require the Court’s assistance in resolving two questions: 1. whether peace officers are  
6 “witnesses” whose names must be redacted under Penal Code section 832.7, subdivision  
7 (b)(6)(B); and 2. whether drafts of the Giordano report are also subject to disclosure.<sup>1</sup>  
8

9 **I. Officers are not “witnesses” under section 832.7(b)(6)(B).**

10 Whether officers are “witnesses” whose names must be redacted from public records  
11 pursuant to Penal Code section 832.7, subdivision (b)(6)(B),<sup>2</sup> is a question of statutory  
12 interpretation. The Court should “first look to the plain meaning of the statutory language, then to  
13 its legislative history,” being sure to account for the “reasonableness of [the] proposed  
14 construction.” (*Riverview Fire Protection Dist. v. Workers’ Comp. Appeals Bd.* (1994) 23  
15 Cal.App.4th 1120, 1126.) Here, each compels the conclusion that “witnesses” excludes peace  
16 officers and instead refers to civilians.

17 a. The text of the statute as whole shows that “witnesses” does not include officers.

18 Section 832.7 does not define the term “witnesses,” and the dictionary definition is broad:  
19 a “witness” is “one who has personal knowledge of something” or “who gives evidence.”<sup>3</sup>  
20 (*MacIsaac v. Waste Mgmt. Collection & Recycling, Inc.* (2005) 134 Cal.App.4th 1076, 1082-83  
21 [courts typically assign “a plain and commonsense meaning unless the statute specifically defines  
22 the words to give them a special meaning,” internal citation omitted].) But critically, “[t]he  
23 meaning of a statute may not be determined from a single word or sentence; the words must be  
24 construed in context, and provisions relating to the same subject matter must be harmonized to

25 <sup>1</sup> The parties also jointly request that the Court review one email in camera to determine whether  
26 it may be withheld based on attorney-client privilege.

27 <sup>2</sup> Unless otherwise noted, all statutory references are to the Penal Code.

28 <sup>3</sup> “Witness,” Merriam-Webster Online Dictionary <<https://www.merriam-webster.com/dictionary/witness>> (as of Dec. 8, 2025).

1 the extent possible.” (*Lungren v. Deukmejian* (1988) 45 Cal. 3d 727, 735, citation omitted.) Here,  
2 viewed in the context of the whole act, the word “witness” must be construed narrowly to exclude  
3 officers and refer to civilians only.

4 *First*, the same provision that requires redaction of “witnesses,” section 832.7, subdivision  
5 (b)(6)(B), also requires redaction of “whistleblowers.” A “whistleblower” is “one who reveals  
6 something covert or who informs against another,” and *especially*, “an employee who brings  
7 wrongdoing by an employer or by other employees to the attention of a government or law  
8 enforcement agency.”<sup>4</sup> In other words, section 832.7(b)(6)(B) protects the identity of officers who  
9 report wrongdoing of another officer as “whistleblowers.” If “witnesses” were interpreted to  
10 include officers who report not only information concerning wrongdoing but *any* information  
11 about other officers, then the narrower protection for “whistleblowers” would be wholly  
12 redundant. And the Court must “give meaning to every word in a statute and [] avoid  
13 constructions that render words, phrases, or clauses superfluous.” (*In re C.H.* (2011) 53 Cal.4th  
14 94, 103, citation and quotation marks omitted; accord *People v. Craft* (1986) 41 Cal.3d 554, 560  
15 “[A] statute should not be given a construction that results in rendering one of its provisions  
16 nugatory.”.)

17 *Second*, section 832.7, subdivision (b)(6)(A) requires redaction to remove “personal data  
18 or information...*other than the names and work-related information of peace and custodial*  
19 *officers*” (emphasis added). The statutory section detailing redactions thus begins with “a strong  
20 policy favoring the disclosure of work-related information about individual police officers,  
21 including their names.” (Appellate Op. at p. 597.) Interpreting subdivision (b)(6)(B) to include  
22 “officers” in the definition of “witnesses” would fly headlong into this provision. (See *People v.*  
23 *Moroney* (1944) 24 Cal.2d 638, 642 [“All the parts of a statute must be construed . . . without  
24 doing violence . . . so that the statute may stand in its entirety,” citation omitted].)

25  
26  
27 <sup>4</sup> “Whistleblower,” Merriam-Webster Online Dictionary <<https://www.merriam-webster.com/dictionary/whistleblower>> (as of Dec. 8, 2025).



1 A hypothetical example illustrates each of these points. Suppose three officers are  
2 attempting to make an arrest. Officer A directs the civilian to lie on the ground. Officer B draws a  
3 weapon and fires. Officer C, standing close by, observes. Each officer later gives a statement, and  
4 it is ultimately determined that Officer B committed misconduct. Under subdivision (b)(6)(A), the  
5 names and work-related information of all officers present must not be redacted. Similarly, under  
6 subdivision (b)(5), the conduct of each officer, and the statement of each, must be disclosed.  
7 Finally, under subdivision (i), the public has a right to know each officer’s identity, unless  
8 outweighed by specific evidence that their safety will be jeopardized from the disclosure.

9 But if subdivision (b)(6)(B) makes Officers B and C “witnesses,” then their identities  
10 would be redacted after all, no findings required. This reading is irreconcilable with the prior  
11 provisions, and would further have the effect of depriving the public of important information  
12 concerning its police force: namely, whether specific officers who were present for a serious use  
13 of force or misconduct had an opportunity to stop it, and whether they forthrightly participated in  
14 the subsequent investigation.

15 In sum, a broad interpretation of “witnesses” to include officers would render other  
16 statutory language contradictory or superfluous, and undermine the clear purpose of the statute. It  
17 therefore must be rejected. (*Arias v. Superior Court* (2009) 46 Cal.4th 969, 979 [construction  
18 cannot control when it frustrates manifest purpose of enactment as a whole]; *Cisneros v. Dept. of*  
19 *Motor Vehicles* (2024) 104 Cal.App.5th 381, 407 [“construction that leads to absurd results may  
20 be rejected for a construction that furthers the legislative intent apparent in the statute.”].)

21 b. The legislative history of section 832.7(b) weighs heavily against the City’s  
22 proposed interpretation.

23 The legislative history of S.B. 1421 further reinforces that the Legislature did not intend to  
24 require redaction of peace officer names as “witnesses.”

25 *First*, the legislative findings underlying S.B. 1421 emphasize the Legislature’s intent to  
26 provide public transparency around not only serious use of force and misconduct incidents, but  
27 also public agencies’ *responses* to those incidents:

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

The public has a right to know all about serious police misconduct, as well as about officer-involved shootings and other serious uses of force. Concealing crucial public safety matters such as officer violations of civilians’ rights, or *inquiries into deadly use of force incidents*, undercuts the public’s faith in the legitimacy of law enforcement, makes it harder for tens of thousands of hardworking peace officers to do their jobs, and endangers public safety.

(Stats. 2018, ch. 988, § 1, subd. (b), italics added.) Interpreting the statute to allow for redaction of officer “witnesses” would not only undercut transparency around the facts of such incidents, but would also impede the public’s ability to assess the adequacy of subsequent investigations. For example, if the identities of officers interviewed as “witnesses” were redacted, the public could not determine if the agency conducted a proper investigation by interviewing all officers present.

*Second*, the Assembly Committee on Public Safety’s bill analysis cited the *Long Beach* opinion requiring public release of officer names extensively, before adding: “[t]his bill is consistent with the Supreme Court’s interpretation of the PRA. The California Supreme Court has found a policy favoring disclosure especially salient when the subject is law enforcement...” (California Bill Analysis, S.B. 1421 Assem. (June 26, 2018), attached as **Exhibit A**, at p. 5; see *Tesco Controls, Inc. v. Monterey Mech. Co.* (2004) 124 Cal.App.4th 780, 792 [“[C]ommittee reports are often useful in determining the Legislature’s intent,” internal citation and quotation marks omitted].) The legislative history materials for S.B. 1421 thus corroborate that the Legislature treated the bill’s redaction provisions as “consistent” with – not rolling back – existing precedent favoring disclosure of officer names.

\* \* \* \* \*

In sum, the statutory text and contemporaneous indicia of legislative intent support an interpretation of “witnesses” that *excludes* peace officers. The Court should accordingly order the City to justify any proposed redactions of peace officer names based on the other provisions of section 832.7, subdivision (b). This is consistent with the Court of Appeal’s guidance suggesting that “the mandatory redaction provisions set forth in section 832.7, subdivision (b)(6) weigh against the redaction of information pertaining to peace officers.” (Appellate Op. at pp. 601, 606,

1 internal citation omitted.) There remain other mechanisms to redact officer names in specific  
2 circumstances, including where there is a “specific, articulable, and particularized reason to  
3 believe that disclosure of the record would pose a significant danger to the physical safety of the  
4 peace officer...” (*Id.* at p. 601, citing Pen. Code, § 832.7, subd. (b)(6)(D).) But the City must  
5 show with the “requisite degree of particularity ‘a clear overbalance on the side of confidentiality’  
6 as to the name of a particular officer” to justify redaction. (Appellate Op. at p. 606, internal  
7 citation omitted.) Simple classification as a “witness” cannot suffice.

8 **II. Draft reports must be disclosed unless the City demonstrates the basis for**  
9 **withholding “clearly outweighs” the interest in disclosure.**

10 The Court of Appeal’s decision also directs this Court to decide whether several drafts of  
11 Giordano’s investigative report should be disclosed. (Appellate Op. at pp. 606-07.) As that  
12 opinion notes, section 832.7 is silent on the release of drafts. (*Ibid.*) But the CPRA does address  
13 this issue, stating that preliminary drafts may only be withheld “if the public interest in  
14 withholding those records clearly outweighs the public interest in disclosure.” (Gov. Code, §  
15 7927.500.) Under this provision, the burden is on the City to demonstrate:

- 16 (1) The record sought must be a preliminary draft, note, or memorandum; (2)  
17 which is not retained by the public agency in the ordinary course of business; and  
18 (3) the public interest in withholding must clearly outweigh the public interest in  
disclosure.

19 (*Citizens for a Better Environment v. Dept. of Food & Agriculture* (1985) 171 Cal.App.3d 704,  
20 711-712; see also *Getz v. Superior Ct.* (2021) 72 Cal.App.5th 637, 654 [discussing requirement to  
21 furnish specific evidence of these conditions].)

22 At this point, the City has not provided any evidence to support its withholding of drafts,  
23 although it has consented to the Court’s review of these materials in camera. While the City’s  
24 justification is yet unknown—and the absence of a specific justification would be dispositive—  
25 there is strong public interest favoring disclosure. As discussed above, one of the primary  
26 rationales for disclosure of records under section 832.7, subdivision (b) is to allow the public to  
27 see how law enforcement agencies investigate and respond to allegations of misconduct. To the  
28 extent that various drafts of an investigative report illustrate changes to the findings and/or

1 investigative decisions in response to review by Department personnel, this may be highly  
2 probative of whether (for example) the Department pursued its investigation in earnest, attempted  
3 to shape a public narrative, or simply sought to sweep matters under the rug. Petitioners have not  
4 seen the drafts at issue, but the City’s amended privilege log indicates that multiple drafts and a  
5 supplemental report were produced between 7/25/2021 and 9/30/2021, and that the investigators  
6 and high-ranking Department personnel – including then-Chief Shawny Williams, and Deputy  
7 Chiefs Michael Kihmm and Bobby Knight – exchanged multiple emails between each draft.  
8 (Defendant’s Privilege Log, attached as **Exhibit B**, at pp. 13-14.) These facts support an inference  
9 that new drafts of the report were being generated to address comments or feedback from  
10 Department supervisors, making them a matter of significant public interest.

11 **Conclusion**

12 For the foregoing reasons, Petitioner respectfully requests that the Court issue an order: 1.  
13 confirming that officer names cannot be redacted as “witnesses” pursuant to section 832.7,  
14 subdivision (b)(6)(B); and 2. ordering the City to publicly produce all drafts of (and supplements  
15 to) the Giordano report.

16  
17 Dated: December 9, 2025

Respectfully submitted,

18 AMERICAN CIVIL LIBERTIES UNION OF  
19 NORTHERN CALIFORNIA

20 By: Emi Young

21 Emi Young (SBN 311238)  
22 eyoung@aclunc.org  
23 Avram Frey (SBN 347885)  
24 afrey@aclunc.org  
25 ACLU FOUNDATION OF NORTHERN  
26 CALIFORNIA  
27 39 Drumm Street  
28 San Francisco, CA 94111

*Attorneys for Petitioner/Plaintiff ACLU of Northern California*

# Exhibit A

CA B. An., S.B. 1421 Assem., 6/26/2018

California Bill Analysis, Assembly Committee, 2017-2018 Regular Session, Senate Bill 1421

June 26, 2018  
California Assembly  
2017-2018 Regular Session

Date of Hearing: June 26, 2018

Counsel: Sandy Uribe

ASSEMBLY COMMITTEE ON PUBLIC SAFETY

Reginald Byron Jones-Sawyer, Sr., Chair

SB 1421 (Skinner) - As Amended June 19, 2018

**SUMMARY:** Subjects specified personnel records of peace officers and correctional officers to disclosure under the California Public Records Act (PRA). Specifically, **this bill:**

- 1) Provides that, notwithstanding any other law, the following the following peace-officer or custodial-officer personnel records are not confidential and shall be made available for public inspection pursuant to the PRA:
  - a) A record relating to the report, investigation, or findings of any of the following:
    - i) An incident involving an officer's discharge of a firearm at a person;
    - ii) An incident involving an officer's discharge of an electronic-control weapon or conducted-energy device at or upon a person;
    - iii) An incident involving an officer striking a person's head or neck with an impact weapon or projectile; or
    - iv) An incident in which an officer's use of force against a person resulted in death, or in serious bodily injury.
  - b) Any record relating to an incident in which a sustained finding was made by a law-enforcement or oversight agency that an officer engaged in sexual assault involving a member of the public, as defined; and,
  - c) Any record relating to an incident in which a sustained finding was made by a law-enforcement or oversight agency of dishonesty by an officer relating to the reporting, investigation, or prosecution of a crime, or relating to the reporting of, or investigation of misconduct by, another officer, including but not limited to, any sustained finding of perjury, false statements, filing false reports, destruction, falsifying, or concealing of evidence.
- 2) States that the records requiring release include, but are not limited to, the framing allegations or complaint, any facts or evidence collected or considered, any reports of the investigation or analysis of the evidence or the conduct, and any findings or recommended findings, as well as any disciplinary or corrective action taken.
- 3) Prohibits the release of a record from a separate and prior investigation of a separate incident unless it is independently subject to disclosure.
- 4) Provides that if an investigation or incident involves multiple officers, information requiring sustained findings for release must be found independently against each officer. However, factual information about an officer's actions during an incident, or an officer's statements about an incident, shall be released if they are relevant to a sustained finding against another officer that is subject to release.
- 5) Requires redaction of records as follows:

- a) To remove personal data or information, such as a home address, telephone number, or identities of family members, other than the names and work-related information of peace officers and custodial officers;
- b) To preserve the anonymity of complainants and witnesses;
- c) To protect confidential medical, financial, or other information in which disclosure would cause an unwarranted invasion of personal privacy that clearly outweighs the strong public interest in records about misconduct by officers; and,
- d) Where there is a specific, particularized reason to believe that disclosure would pose a significant danger to the physical safety of the officer or others.

6) Allows delayed disclosure for records relating to an investigation or court proceeding involving a use-of-force incident, as follows:

- a) During an active criminal investigation, disclosure may be delayed for up to 60 days from the date the use of force occurred, or until the prosecutor decides whether to file criminal charges, whichever occurs first. After 60 days from the use-of-force incident, disclosure may still be delayed if it could reasonably be expected to interfere with the investigation. However, at 180 day intervals as necessary, the agency must justify the continued delayed disclosure, as specified. Information withheld must be disclosed no later than 18 months after the date of the incident if the investigation involves the officer who used force. If the information involves someone other than the officer, then disclosure must occur no later than 18 months after the incident, unless there are extraordinary circumstances warranting continued delay;
- b) If criminal charges are filed in relation to the use-of-force incident, the agency may delay disclosure until a verdict is reached at trial, or in the case involving an entry of plea, until the time to withdraw the plea; and,
- c) During an administrative investigation into a use-of-force incident, the agency may delay disclosure until the agency determines whether the use of force violated a law or agency policy, but no longer than 180 days after the date of the employing agency's discovery of the use of force, or allegation of use of force by a person authorized to initiate an investigation, or 30 days after the close of the criminal investigation related to the officer's use of force, whichever is later.

7) Prohibits release of records if an administrative investigation results in a determination by the employing agency that the complaint is unfounded because the alleged use of force did not occur.

8) Specifies that these provisions do not affect or supersede the criminal discovery process, or the admissibility of peace officer personnel records.

9) Defines the following terms for purposes of the meaning of personnel records:

- a) "Sustained" means "a final determination by an investigating agency, commission, board, hearing officer, or arbitrator, as applicable, following an investigation and opportunity for an administrative appeal . . . , that the actions of the peace officer or custodial officer were found to violate law or department policy;" and
- b) "Unfounded" means "that an investigation clearly establishes that the allegation is not true."

10) Contains legislative findings and declarations about the authority of peace officers and the public's faith in the legitimacy of law enforcement.

#### **EXISTING LAW:**

1) Provides pursuant to the California Public Records Act (PRA) that all records maintained by local and state governmental agencies are open to public inspection unless specifically exempt. ([Gov. Code, §§ 6250 et seq.](#))

2) Defines "public records" to include any writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics. ([Gov. Code, § 6252, subd. \(e\).](#))

3) States that, except as in other sections of the PRA, this chapter does not require the disclosure of specified records, which includes among other things: records of complaints to, or investigations conducted by specified agencies, including any state or local police agency, or any investigatory or security files compiled by any other state or local police agency, or any investigatory

or security files compiled by any other state or local agency for correctional, law enforcement, or licensing purposes. (Gov. Code, § 6254, subd. (f).)

4) Provides, notwithstanding any other law, state and local law enforcement agencies shall make public the following information, except to the extent that disclosure of a particular item of information would endanger the safety of a person involved in an investigation or would endanger the successful completion of the investigation or a related investigation:

- a) The full name and booking information of all persons arrested;
- b) Calls for service logs and crime reports, subject to protections for protecting the confidentiality of victims; and,
- c) The addresses of individuals arrested by the agency and victims of a crime, where the requester declares under penalty of perjury that the request is made for a scholarly, journalistic, political, or governmental purpose, or that the request is made for investigation purposes by a licensed private investigator. (Gov. Code, § 6254, subd. (f).)

5) Requires an agency to justify withholding any record by demonstrating that the record in question is exempt under express provisions of the PRA or that on the facts of the particular case, the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record. (Gov. Code, § 6255, subd. (a).)

6) Authorizes any person to institute proceedings for injunctive or declarative relief or writ of mandate in any court of competent jurisdiction to enforce his or her right to inspect or to receive a copy of any public record or class of public records under this chapter. (Gov. Code, § 6258.)

7) States that peace officer or custodial officer personnel records and records maintained by any state or local agency pursuant to citizens' complaints against personnel are confidential and shall not be disclosed in any criminal or civil proceeding except by discovery. This section shall not apply to investigations or proceedings concerning the conduct of peace officers or custodial officers, or any agency or department that employ these officers, conducted by a grand jury, a district attorney's office, or the Attorney General's office. (Pen. Code, § 832.7, subd. (a).)

8) States that police "personnel records" include "complaints, or investigations of complaints, concerning an event or transaction in which the officer participated, or which he or she perceived, and pertaining to the manner in which he or she performed his or her duties." (Pen. Code, § 832.8.)

9) Sets forth the procedure for obtaining peace officer personnel records or records of citizen complaints or information from these records. Specifically, in any case in which discovery or disclosure is sought of peace officer or custodial officer personnel records or records of citizen complaints against peace officers or custodial officers or information from those records, the party seeking the discovery or disclosure shall file a written motion with the appropriate court or administrative body upon written notice to the governmental agency which has custody and control of the records, as specified. (Evid. Code, § 1043.)

**FISCAL EFFECT:** Unknown.

**COMMENTS:**

1) **Author's Statement:** According to the author, "SB 1421 benefits law enforcement and the communities they serve by helping build trust. Giving the public, journalists, and elected officials access to information about actions by law enforcement will promote better policies and procedures that protect everyone. We want to make sure that good officers and the public have the information they need to address and prevent abuses and to weed out the bad actors. SB 1421 will help identify and prevent unjustified use of force, make officer misconduct an even rarer occurrence, and build trust in law enforcement."

2) **General Public Access to Peace Officer Records:** The purpose of the PRA is to prevent secrecy in government and to contribute significantly to the public understanding of government activities. (*City of San Jose v. Superior Court* (1999) 74 Cal.App.4th 1008, 1016-1017.) Thus, under the PRA, generally all public records are open to public inspection unless a statutory exception exists. But, even if a specific exception does not exist, an agency may refuse to disclose records if on balance, the interest of nondisclosure outweighs disclosure. "The specific exceptions of [section 6254](#) should be viewed with the general philosophy of [section 6255](#) in mind; that is, that records should be withheld from disclosure only where the public interest served

by not making a record public outweighs the public interest served by the general policy of disclosure.” (53 Ops.Cal.Atty.Gen. 136 (1970).)

Notwithstanding the PRA, both police personnel records and police investigatory records are generally protected.

a) *Police Investigatory Records*: Under the PRA, police investigatory records are exempt from disclosure. ([Gov. Code, § 6254, subd. \(f\)](#).) The California Supreme Court has expressly rejected this to mean that all information reasonably related to criminal activity is exempt. “Such a broad exemption . . . would effectively exclude the law enforcement function of state and local governments from any public scrutiny under the California Act, a result inconsistent with its fundamental purpose.” (*American Civil Liberties Union Foundation v. Deukmejian* (1982) 32 Cal.3d 440, 449.) Additionally, a record or document that contains some information that is exempt does not require the entire record to be exempt as long as the exempt material is reasonably segregable from the non-exempt material. (*Id.* at p. 453.)

b) *Police Personnel Records*: Under the Penal Code, certain police personnel records are deemed confidential. ([Pen. Code, §§ 832.5, 832.7, 832.8](#).) “Personnel records” are defined to include any file maintained under that individual's name by the officer's employing agency and containing records relating to any of the following, among other things, “employee advancement, appraisal, or discipline” and “complaints, or investigations of complaints, concerning an event or transaction in which he or she participated, or which he or she perceived, and pertaining to the manner in which he or she performed his or her duties.” ([Pen. Code, § 832.8, subs. \(d\) and \(e\)](#).)

This bill loosens the protections afforded to specified peace officer records relating to use of force, sexual assault on a member of the public and pertaining to dishonesty in reporting, investigating, or prosecuting a crime.

3) **Case Law Review**: In *Copley-Press, Inv. v. Superior Court* (2006) 39 Cal.4th 1272, the California Supreme Court held that the Penal Code, as written, exempts peace officer personnel records from disclosure under the PRA. In *Copley-Press*, a newspaper publisher requested disciplinary appeal records for a particular officer that had been terminated. The newspaper publisher, Copley-Press, argued for disclosure by stating, among other reasons, that the records maintained by the Commission conducting the disciplinary appeal were not protected because they are not personnel records. The Court rejected this view and stated that the records are “personnel records” and therefore are confidential. It did not matter that the Commission, rather than the actual law enforcement agency was in possession of the documents. The Court relied largely on the language of [Penal Code section 832.7, subdivision \(c\)](#), which permits a department or agency that employs peace officers to disclose certain data against officers, but only “if that information is in a form which does not identify the individuals involved.” The Court reasoned that the information demonstrates that the statute is intended to protect, among other things, the identity of officers subject to complaints. (*Id.* at p. 1289.)

It should be noted that in *Copley-Press, supra*, 39 Cal.4th 1272, the Supreme Court stressed that weighing the matter of whether and when such records should be subject to disclosure is a policy decision for the Legislature, not the courts, to make. (*Id.* at p. 1299 [“In any event, it is for the Legislature to weigh the competing policy considerations”].) That is what this bill seeks to do. This bill would exempt the specific police personnel records noted above from confidentiality based on a policy decision that the public has a right to know about serious police misconduct.

A more recent California Supreme Court case considered release of records under the PRA and distinguished *Copley-Press, supra*. In *Long Beach Police Officers Association v. City of Long Beach* (2015) 59 Cal.4th 59, a police union sought to prevent disclosure of the names of Long Beach police officers involved in certain shootings while on-duty pursuant to exceptions in the PRA. The California Supreme Court, in reviewing the statutes that make police personnel records confidential ([Pen. Code, §§ 832.7 and 832.8](#)) stated that the information contained in the initial incident report of an on-duty shooting are typically not “personnel records” although it would result in an investigation by the employing agency and may lead to discipline. “Only the records *generated* in connection with that appraisal or discipline would come within the statutory definition of personal records. ([Pen. Code, 832.8, subd. \(d\)](#).) We do not read the phrase ‘records relating to . . . employee . . . appraisal or discipline’ so broadly to include every record that might be *considered* for purposes of an officer's appraisal or discipline, for a such a broad reading of the statute would sweep virtually all law enforcement records into the protected category of ‘personnel records.’” (*Id.* at pp. 71-72.)

The Court also analyzed the investigatory records exception within the PRA ([Gov. Code, § 6254, subd. \(f\)](#)) to support its conclusion that not all records pertaining to an on-duty shooting are confidential. The Court noted that paragraphs (1) and (2) of subdivision (f) require the disclosure of the officer's name when a shooting occurs by the officer during an arrest, or in the course of responding to a complaint or request for assistance, or when the officer's name is recorded as a factual circumstance

of the incident. “It thus appears that the Legislature draws a distinction between (1) records of factual information about an incident (which generally must be disclosed) and (2) records generated as part of an internal investigation of an officer in connection with the incident (which generally are confidential).” (*Long Beach Officers Association, supra*, 59 Cal.4th at p. 72.)

Likewise, the Court found that the exception against disclosure of personnel records if disclosure would constitute an unwarranted invasion of personal privacy, ([Gov. Code, § 6254, subd. \(c\)](#)), would in most instances weigh in favor of disclosure. “The public’s substantial interest in the conduct of its peace officers outweighs, in most cases, the officer’s personal privacy interest.” (*Long Beach Officers Association, supra*, 59 Cal.4th at p. 73.)

The Court distinguished its finding from *Copley, supra*, where the court held that an officer’s identity was protected from disclosure as a “personnel record.” In *Copley, supra*, disclosing the name of the officer in disciplinary appeal records would link the officer to confidential personnel matters involving disciplinary action. In this case, disclosing the names of officers involved in various shootings would not imply that those shootings resulted in disciplinary action against the officers, and it would not link those names to any confidential personnel matters or other protected information. (*Long Beach Officers Association, supra*, 59 Cal.4th at p. 73.)

Lastly, the Court considered the catchall exemption in the PRA that allows a public agency to withhold any public record if the agency shows that “on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.” ([Gov. Code, § 6255](#).) The court concluded that vague safety concerns that apply to all officers involved in shootings are insufficient to tip the balance against disclosure. (*Long Beach Officers Association, supra*, 59 Cal.4th at p. 74.) Thus, the Court rejected the blanket rule sought by the union preventing disclosure of officer names every time an officer is involved in a shooting, and stated that that some circumstances may warrant the nondisclosure of names but the facts of this case did not warrant it. (*Id.* at p. 75.)

This bill is consistent with the Supreme Court’s interpretation of the PRA. The California Supreme Court has found a policy favoring disclosure especially salient when the subject is law enforcement: In order to maintain trust in its police department, the public must be kept fully informed of the activities of its peace officers. (See *Long Beach Officers Association, supra*, 59 Cal.4th at p. 74, see also *Commission on Peace Officer Standards & Training v. Superior Court* (2007) 42 Cal.4th 278, 297.) In *Commission on Peace Officer Standards, supra*, the Supreme Court noted:

Given the extraordinary authority with which they are entrusted, the need for transparency, accountability and public access to information is particularly acute when the information sought involves the conduct of police officers. In *Commission on Police Officer Standards*, the Supreme Court observed, “The public’s legitimate interest in the identity and activities of peace officers is even greater than its interest in those of the average public servant. ‘Law enforcement officers carry upon their shoulders the cloak of authority to enforce the laws of the state. In order to maintain trust in its police department, the public must be kept fully informed of the activities of its peace officers.’ [Citation.] ‘It is indisputable that law enforcement is a primary function of local government and that the public has a far greater interest in the qualifications and conduct of law enforcement officers, even at, and perhaps especially at, an “on the street” level than in the qualifications and conduct of other comparably low-ranking government employees performing more proprietary functions. The abuse of a patrolman’s office can have great potentiality for social harm ....”’ (*Commission on Police Officer Standards*, at pp. 297-298, fn. omitted.)

Release of the personnel records contemplated in this bill is precisely the kind of disclosure which will promote public scrutiny of, and accountability for, law enforcement.

**4) Discovery of Police Records in Criminal Cases:** In *Pitchess v. Superior Court* (1974) 11 Cal.3d 531, the California Supreme Court held that under certain circumstances, and upon an adequate showing, a criminal defendant may discover information from an officer’s otherwise-confidential personnel file that is relevant to his or her defense. The California Legislature codified these procedures, which have become known as *Pitchess* motions, in [Penal Code sections 832.7 and 832.8](#), and [Evidence Code sections 1043-1045](#).

The *Pitchess* statutes require a criminal defendant to file a written motion that identifies and demonstrates good cause for the discovery sought. If such a showing is made, the trial court then reviews the law enforcement personnel records in camera with the custodian, and discloses to the defendant any relevant information from the personnel file. (*People v. Mooc* (2001) 26 Cal.4th 1216, 1226.) Absent compliance with these procedures, peace officer personnel files, and information from them, are confidential and cannot be disclosed in any criminal or civil proceeding. The prosecution, like the defense, cannot discover peace officer personnel records without first following the *Pitchess* procedures. (*Alford v. Superior Court* (2003) 29 Cal.4th

1033, 1046.) Any records disclosed are subject to a mandatory order that they be used only for the purpose of the court proceeding for which they were sought. (*Id.* at p. 1042.)

This bill specifically states that its provisions do not affect or supersede the criminal discovery process, or the admissibility of peace officer personnel records. The purpose of the bill is to give the general public, not a criminal defendant, access to otherwise confidential police personnel records relating to serious police misconduct in an effort to increase transparency.

#### 5) Arguments in Support:

a) According to the *California Newspaper Publishers Association*, a Co-sponsor of this bill, “Recent events, like the death of Stephon Clark in Sacramento, and those seared into California’s history, like the beating of Rodney King in Los Angeles, underscore the immense public concern related to police and community interactions. Under current law, the public has little ability to access records related to police misconduct and use of force, depriving the press of the ability to fully investigate the activity of powerful public institutions.

“SB 1421 would make certain police records disclosable under the California Public Records Act, in three instances; 1) where there is a sustained finding of sexual misconduct, 2) where there is a sustained finding of an act of dishonesty like perjury, falsifying evidence, or other similar act that compromises an individual’s due process rights, and 3) when there is a serious use of force which could lead to injury or death.

“Courts have long recognized that activity of police officers is of the highest public concern, particularly when they use serious or deadly force. Law enforcement officials wield immense power. For that reason, they should be subject to the same level of scrutiny as all other public employees, whose personnel records are disclosable in cases of heightened public concern. The same reasoning applies to the substantiated cases of sexual misconduct or proven dishonesty. In the case of police shootings, the public interest in disclosure is at its zenith, even when there is no claim of misconduct and a use of force is ‘within policy.’

“SB 1421 provides a balanced framework for mandating the disclosure of records, while protecting investigatory and safety interests. As amended on May 25, SB 1421 sets forth a timing procedure for disclosure, allowing for delay if release would impair an important interest, but presuming disclosure after a certain time.

“A lack of transparency results in distrust. SB 1421 mandates transparency to help cure the problems secrecy has sown over the last 40 years. This disclosure scheme provides flexibility for public agencies to protect due process rights, while giving certainty to families and the public who seek to know, ‘What happened?’”

b) The *Santa Clara County District Attorney* writes, “In Santa Clara, since becoming District Attorney in 2010, I shifted our office away from routinely using secret grand juris when confronted with an officer-involved shooting. Instead, I would assign senior prosecutors known for their technical expertise, diligence and integrity to evaluate the incident and write a public report. While we are one of the only District Attorney’s Office to successfully prosecute law enforcement officers for murder, in most cases, we have found that presenting our findings publicly can assure the public we take any official use of force seriously. People can see the evidence we considered, and they can understand the reasons for our conclusions. In other words, we treat people of our county like free adults who live in a democracy and who can be trusted to evaluate evidence and make decisions. I’ve even gotten letters of thanks from police officers who are grateful that their name has been cleared. It is a fair system. It is not ‘anti-police’, and it is not liberal or conservative. We have found that it works to protect the public, protect police officers against unfair allegations, and allows a more transparent and just form of governing.

“I believe that your bill, SB 1421, can achieve similar results across the state.”

#### 6) Arguments in Opposition:

a) According to the *California State Sheriffs’ Association*, “For years, statute and case law have provided enhanced and appropriate privacy protections for peace officer personnel records as well as methods and circumstances under which records could be accessed. Unfortunately, in the name of bringing more transparency to these records and disciplinary proceedings, SB 1421 jeopardizes officer privacy.

“Additionally, SB 1421 opens records related to use of force investigations to public scrutiny, potentially months before an investigation is concluded. Mandating that records be released no later than 18 months from the use of force could jeopardize the integrity of a pending investigation or criminal proceeding. Additionally, the costs of opening these records to the public will be significant and will require additional resources.”

b) The *California Association of Highway Patrolmen* and the *Peace Officers Research Association of California* “oppose this bill for the following reasons:

“There currently exists an unfair appellate process; disclosing the findings prior to a court fully reviewing and analyzing the matter would unduly prejudice what could be an innocent officer.

“The current law provides for confusion and uncertainty in the administrative disciplinary process; each department has its own regulations that it follows and some are more fair than others.

“In a case with mixed allegations (i.e., the department chooses to ‘load up’ the discipline by raising numerous allegations of misconduct, some of which would fall under the categories for disclosure and some of which would not), there is no way to parse out what should and should not be disclosed.

“Should information about law enforcement discipline be publicized, a wave of habeas corpus petitions from convicted criminals would follow. Criminals previously arrested or investigated by an officer who is the subject of misconduct allegations would inundate the court system and render the court process confusing and unreliable.

“There would, likewise and for similar reasons, be an increase in civil lawsuits brought against governmental entities, forcing the entities to expend a great amount of public funds to defend against the lawsuits, rather than spending it on more important community needs.

“Due to the concern by law enforcement that their names might be disclosed, officers may hesitate before acting, creating an officer safety issue.

“Likewise, this could lead to officers being hesitant to become involved in an incident, potentially decreasing actively-engages law enforcement and resulting in a decrease in the safety of the communities (Chicago effect).”

7) **Related Legislation:** AB 931 (Weber) authorizes a peace officer to use deadly force only when such force is necessary to prevent imminent death or serious bodily injury to the officer or to another person. AB 931 is pending hearing in the Senate Appropriations Committee.

8) **Prior Legislation:**

a) AB 1957 (Quirk), of the 2015-2016 Legislative Session, would have provided a set of procedures for disclosing footage from a law enforcement officer's body-worn camera. AB 1957 failed passage on the Assembly Floor.

b) SB 1286 (Leno), of the 2015-2016 Legislative Session, would have provided greater public access to peace officer and custodial officer personnel records and other records maintained by a state or local agency related to complaints against those officers. SB 1286 was held in the Senate Appropriations Committee.

c) AB 1648 (Leno), 2007 of the 2007-2008 Legislative Session, as introduced, would have overturned the California Supreme Court decision in *Copley Press, supra*, 39 Cal.4th 1272, and restore public access to peace officer records. AB 1648 failed passage in the Assembly Public Safety Committee.

d) SB 1019 (Romero), of the 2007-2008 Legislative Session, would have abrogated the holding in *Copley Press, supra*, 39 Cal.4th 1272, for law enforcement agencies operating under a federal consent decree on the basis of police misconduct. SB 1019 failed passage in the Assembly Public Safety Committee.

**REGISTERED SUPPORT / OPPOSITION:**

**Support**

American Civil Liberties Union of California (Co-Sponsor)

Anti-Recidivism Coalition (Co-Sponsor)

California Chapters of Black Lives Matter (Co-Sponsor)

California Faculty Association (Co-Sponsor)

California News Publisher Association (Co-Sponsor)

Communities United for Restorative Youth Justice (Co-Sponsor)

Youth Justice Coalition (Co-Sponsor)

A New Path

A New Way of Life

Advancement Project California

AF3IRM

AFSCME 3299

Alliance for Boys and Men of Color

Alliance San Diego

American Civil Liberties Union of California

Anaheim Community Coalition

Anti Police-Terror Project

Arab American Civic Council

Asian Americans Advancing Justice

Asian Law Alliance

Bay Area Chapter of Showing Up for Racial Justice

Bay Area Student Activist

Bend the Arc: Jewish Action

Berkeley City Council

Black American Political Association of California, Sacramento Chapter

Black Jewish Justice Alliance

Black and Pink, Inc.

Cage-Free Repair

California Alliance for Youth and Community

California Broadcasters Association

California Coalition for Women Prisoners

California Church IMPACT

California Federation of Teachers

California Immigrant Policy Center

California Immigrant Youth Justice Alliance  
California Latinas for Reproductive Justice  
California Public Defenders Association  
California Nurses Association  
Californians Aware  
Californians for Justice  
Californians United for a Responsible Budget  
Catholic Worker  
CDTech  
Center on Juvenile and Criminal Justice  
Chican@s Unidos  
Children's Defense Fund  
Chipsa  
Church in Ocean Park  
Coalition for Justice and Accountability  
Climate Action Campaign  
Committee for Racial Justice  
Community Coalition  
Conference of California Bar Associations  
Council on American-Islamic Relations, California  
Courage Campaign, California  
Critical Resistance  
Davis People Power  
Dignity and Power Now  
Drain the NRA  
Earl B. Gilliam Bar Association  
East Bay Community Law Center  
Education Trust-West

Ella Baker Center for Human Rights  
Equal Justice Society  
Equity for Santa Barbara  
Fannie Lou Hamer Institute  
First Amendment Coalition  
Friends Committee on Legislation of California  
Greater Long Beach Interfaith Community Organization  
Homeboy Industries  
Immigrant Legal Resource Center  
Indivisible StateStrong  
InnerCity Struggle  
Interfaith Movement  
Interfaith Worker Justice San Diego  
International Federation of Professional & Technical Engineers  
IUCC Advocated for Peace and Justice  
Journey House  
Koreatown Immigrant Workers Alliance  
LA Voice  
LAANE  
Law Enforcement Accountability Network  
Lawyers' Committee for Civil Rights of the San Francisco Bay Area  
Legal Services for Prisoners with Children  
Long Beach Chapter of Showing Up for Racial Justice  
Los Angeles National Lawyers Guild  
March and Rally Los Angeles  
Marin Chapter of Showing Up for Racial Justice  
Media Alliance  
Mexican American Legal Defense and Education Fund

Mid-City CAN

Mother's Quest

Motivating Individual Leadership for Public Advancement

National Association of Social Workers, California Chapter

National Juvenile Justice Network

NorCal Chapter of Showing Up for Racial Justice

Oak View ComUNIDAD

Oakland Privacy

Orange County Communities Organized for Responsible Development

Orange County Equality Coalition

Orange County Racial Justice Collaborative

Pacific Media Workers Guild

Partnership for the Advancement of New Americans

People Acting in Community Together

Pico California

PolicyLink

Prevention Institute

Project Rebound

Public Health Justice Collective

Reporters Committee

Resilience Orange County

Riverside Coalition for Police Accountability

Root & Rebound

R Street

Sacramento Chapter of Showing Up for Racial Justice

San Diego Chapter of Jack and Jill of America

San Diego LGBT Community Center

San Diego Organizing Project

San Diego Unified School District  
San Francisco District Attorney  
San Francisco National Lawyers Guild  
San Francisco Public Defender  
San Gabriel Valley Immigrant Youth Coalition  
Santa Ana Building Healthy Communities  
Santa Ana Unidos  
Santa Barbara Chapter of Showing Up for Racial Justice  
Santa Clara District Attorney  
Service Employees International Union  
Showing Up for Racial Justice Sacramento  
Services, Immigrant Rights, and Education Network  
Sillicon Valley De-BUG  
Social Justice Learning Institute  
Sonoma County Democratic Party  
Southeast Asia Resource Action Center  
Stop LAPD Spying Coalition  
Street Level Health Project  
Think Dignity  
Transgender Law Center  
UAW2865, UC Student-Workers Union  
Union of Alameda County Public Defender's Office  
UNITE HERE Local 11  
Urban Peace Institute  
Urban Peace Movement  
Village Connect  
W. Haywood Burns Institute  
White People 4 Black Lives

Women's Foundation of California

Women For: Orange County

Young Women's Freedom Center

Youth ALIVE!

@Press4word

Nine Private Individuals

**Opposition**

Association of Deputy District Attorneys

Association for Los Angeles Deputy Sheriffs

California Association of Highway Patrolmen

California District Attorneys Association

California Peace Officers' Association

California Police Chiefs Association

California Narcotic Officers' Association

California State Sheriffs' Association

Chief Probation Officers of California

Los Angeles County Professional Peace Officers Association

Los Angeles Probation Officers

Los Angeles Police Protective League

Peace Officers Research Association of California

San Bernardino Sheriff-Coroner

**Analysis Prepared by:** Sandy Uribe / PUB. S. / (916) 319-3744

CA B. An., S.B. 1421 Assem., 6/26/2018

---

End of Document

© 2025 Thomson Reuters. No claim to original U.S. Government Works.

# Exhibit B

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCCS059257  
 DEFENDANT'S PRIVILEGE LOG

Date	Document Description	Author	Recipient(s)	Privilege	RPD	SROG	FROG	RFA
7/30/2020	E-mail RE Investigator Selection	Dania Wong	Anne Cardwell, Heather Ruiz, Shawmy Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1			1
7/30/2020	E-mail RE Investigator Selection	Anne Cardwell	Randy Risner, Katelyn Knight, Shawmy Williams, Heather Ruiz, Dania Wong	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1			1
7/31/2020	E-mail RE Investigator Selection	Shawmy Williams	Meera Bhatt, Katelyn Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1			1
7/31/2020	E-mail RE Selection of Investigator	Dania Torrest Wong	Anne Cardwell, Heather E Ruiz, Shawmy Williams	Attorney-Client Privilege	1			1
7/31/2020	E-mail RE Selection of Investigator	Dania Torrest Wong	Randy J. Risner	Attorney-Client Privilege	1			1
7/31/2020	E-mail RE Legal Analysis	Randy J. Risner	Meera Bhatt	Attorney-Client-Privilege; Attorney Work Product				
7/31/2020	E-mail RE Legal Analysis	Meera Bhatt	Randy J. Risner	Attorney-Client Privilege; Attorney Work Product				
7/31/2020	E-mail RE Legal Analysis	Randy J. Risner	Meera Bhatt	Attorney-Client Privilege; Attorney Work Product	1			1
7/31/2020	E-mail RE Legal Analysis	Randy J. Risner	City Council, Greg Nyhof, Anne Cardwell, Meera Bhatt	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege	1			1
7/31/2020	E-mail RE Legal Analysis	Robert McConnell	Randy J. Risner, Bob Sampayan	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege	1			1
7/31/2020	E-mail RE Investigator Selection	Brittany Jackson	Shawmy Williams, Joe Allio, Katelyn Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1			1
7/31/2020	E-mail RE Personnel Investigation	Joe Allio	Laura Cole, Katelyn Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1, 5			1, 6 2, 4, 13-14
7/31/2020	E-mail RE Personnel Investigation	Laura Cole	Joe Allio, Katelyn Knight, Shawmy Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1, 5			1, 6 2, 4, 13-14
7/31/2020	E-mail RE Personnel Investigation	Shawmy Williams	Joe Allio, Brittany Jackson, Katelyn Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege	1			1, 6 2, 4, 14
7/31/2020	E-mail RE Personnel Investigation	Joe Allio	Shawmy Williams, Brittany Jackson, Katelyn Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1			1
7/31/2020	E-mail RE Investigator Selection	Meera Bhatt	Shawmy Williams, Katelyn Knight, Randy Risner, Joe Allio	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1			1, 17 15
7/31/2020	E-mail RE Investigator Selection	Shawmy Williams	Meera Bhatt, Katelyn Knight, Randy Risner, Joe Allio	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1			1
7/31/2020	E-mail RE Investigator Selection	Joe Allio	Shawmy Williams, Katelyn Knight, Randy Risner, Joe Allio, Meera Bhatt	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1			1
8/3/2020	E-mail RE Selection of Investigator	Dania Torrest Wong	Anne Cardwell, Shawmy Williams, Joe Allio, Bob Deis	Attorney client privilege	1			1
8/4/2020	E-mail RE Investigator Selection	Anne Cardwell	Randy Risner, Katelyn Knight, Meera Bhatt, Shawmy Williams, Joe Allio, Heather Ruiz	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege	1			1
8/4/2020	E-mail RE Contract for Personnel Investigation	Randy Risner	Anne Cardwell, Katelyn Knight, Meera Bhatt, Shawmy Williams, Joe Allio, Heather Ruiz	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege	1			1
8/4/2020	E-mail RE Contract for Personnel Investigation	Anne Cardwell	Christine Maloney, Robert Giordano, Katelyn Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1			1

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

8/4/2020	E-mail RE Contract for Personnel Investigation	Robert Giordano	Anne Cardwell, Christine Maloney, Katelyn Knight	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/5/2020	E-mail RE Contract for Personnel Investigation	Christine Maloney	Anne Cardwell, Katelyn Knight	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/6/2020	E-mail RE Investigator Selection	Randy Risner	Anne Cardwell, Greg Nyhoff, Katelyn Knight, Meera Bhatt, Shawny Williams, Joe Alijo, Heather Ruiz	Penal Code Section 832.7(a): Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1	1		
8/6/2020	E-mail RE Investigator Selection	Anne Cardwell	Randy Risner, Greg Nyhoff, Katelyn Knight, Meera Bhatt, Shawny Williams, Joe Alijo, Heather Ruiz	Penal Code Section 832.7(a): Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1	1		
8/6/2020	E-mail RE Investigator Selection	Anne Cardwell	Randy Risner, Greg Nyhoff, Katelyn Knight, Meera Bhatt, Shawny Williams, Joe Alijo, Heather Ruiz	Penal Code Section 832.7(a): Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1	1		
8/6/2020	E-mail RE Investigator Selection	Randy Risner	Anne Cardwell, Greg Nyhoff, Katelyn Knight, Meera Bhatt, Shawny Williams, Joe Alijo, Heather Ruiz	Penal Code Section 832.7(a): Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1	1		
8/6/2020	E-mail RE Investigator Selection	Randy Risner	Anne Cardwell, Greg Nyhoff, Katelyn Knight, Meera Bhatt, Shawny Williams, Joe Alijo, Heather Ruiz	Penal Code Section 832.7(a): Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1	1		
8/6/2020	E-mail RE Investigator Selection	Anne Cardwell	Randy Risner, Greg Nyhoff, Katelyn Knight, Meera Bhatt, Shawny Williams, Joe Alijo, Heather Ruiz	Penal Code Section 832.7(a): Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1	1		
8/10/2020	E-mail thread RE Legal Analysis	Randy J. Risner	Shawny Williams, Christina Lee, Greg Nyhoff, Michelle Straub, Anne Cardwell, Brittany Jackson	Attorney client privilege	1	1, 17		15
8/10/2020	E-mail RE Contract for Personnel Investigation	Anne Cardwell	Robert Giordano, Christine Maloney, Randy Risner, Katelyn Knight, Shawny Williams	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/10/2020	E-mail RE Contract for Personnel Investigation	Robert Giordano	Anne Cardwell, Shawny Williams	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/10/2020	E-mail RE Contract for Personnel Investigation	Anne Cardwell	Robert Giordano, Shawny Williams, Randy Risner, Katelyn Knight	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/12/2020	E-mail RE Personnel Investigation	Joe Alijo	Robert Giordano, Christine Maloney	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/12/2020	E-mail RE Personnel Investigation	Robert Giordano	Joe Alijo, Christine Maloney	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/12/2020	E-mail RE Contract for Personnel Investigation	Robert Giordano	Anne Cardwell, Christine Maloney, Randy Risner, Katelyn Knight, Shawny Williams	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/13/2020	E-mail RE Contract for Personnel Investigation	Katelyn Knight	Robert Giordano, Anne Cardwell, Christine Maloney, Randy Risner, Shawny Williams	Penal Code Section 832.7(a): Constitutional Right of Privacy; Attorney-Client Privilege; Deliberative Process Privilege	1	1		
8/14/2020	E-mail RE Personnel Investigation	Joe Alijo	Robert Giordano, Christine Maloney	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/14/2020	E-mail RE Personnel Investigation	Robert Giordano	Joseph Alijo, Christine Maloney	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/16/2020	E-mail RE Personnel Investigation	Robert Giordano	Michael Kihmm, Shawny Williams	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/16/2020	E-mail RE Contract for Personnel Investigation	Robert Giordano	Christa Granton, Katelyn Knight	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/18/2020	E-mail RE Contract for Personnel Investigation	Robert Giordano	Anne Cardwell, Christine Maloney, Randy Risner, Katelyn Knight, Shawny Williams	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/18/2020	E-mail RE Contract for Personnel Investigation	Anne Cardwell	Robert Giordano, Christine Maloney, Randy Risner, Katelyn Knight, Shawny Williams	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/20/2020	E-mail RE Contract for Personnel Investigation	Robert Giordano	Anne Cardwell	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

8/24/2020	Email RE Personnel Investigation	Christine Maloney	Joe Allio, Robert Giordano	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/24/2020	Email RE Personnel Investigation	Joe Allio	Sanjay Ramrakha, Jon Brown, Bobby Knight	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/24/2020	Email RE Personnel Investigation	Sanjay Ramrakha	Joe Allio, Jon Brown, Bobby Knight	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/24/2020	Email RE Personnel Investigation	Joe Allio	Sanjay Ramrakha, Jon Brown, Bobby Knight	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/24/2020	Email RE Personnel Investigation	Robert Giordano	Katelyn Knight, Joe Allio, Christine Maloney	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/24/2020	Email RE Personnel Investigation	Katelyn Knight	Robert Giordano, Joe Allio, Christine Maloney, Meera Bhat	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/25/2020	Email RE Personnel Investigation	Joe Allio	Robert Giordano, Shawny Williams, Christine Maloney	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/25/2020	Email RE Personnel Investigation	Robert Giordano	Joe Allio, Shawny Williams, Christine Maloney	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/25/2020	Email RE Personnel Investigation	Joe Allio	Robert Giordano	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/25/2020	Email RE Personnel Investigation	Joe Allio	Robert Giordano	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/25/2020	Email RE Personnel Investigation	Shawny Williams	Joe Allio	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/25/2020	Email RE Personnel Investigation	Robert Giordano	Shawny Williams, Christine Maloney	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/25/2020	Email RE Personnel Investigation	Shawny Williams	Joe Allio	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/25/2020	Email RE Personnel Investigation	Robert Giordano	Joe Allio, Shawny Williams, Christine Maloney	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/25/2020	Email RE Personnel Investigation	Joe Allio	Bobby Knight	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/25/2020	Email RE Personnel Investigation	Robert Giordano	Katelyn Knight, Joe Allio, Christine Maloney, Meera Bhat	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/25/2020	Email RE Personnel Investigation	Robert Giordano	Joe Allio, Shawny Williams, Christine Maloney	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/28/2020	Email RE Personnel Investigation	Katelyn Knight	Robert Giordano, Christina Maloney, Meera Bhat	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/28/2020	Email RE Personnel Investigation	Robert Giordano	Katelyn, Christina Maloney, Meera Bhat	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/28/2020	Email RE Contract for Personnel Investigation	Anne Cardwell	Katelyn Knight, Vanessa Garcia, Meera Bhat	Penal Code Section 832.7(a): Constitutional Right of Privacy; Attorney-Client Privilege	1	1		
8/31/2020	Email RE Personnel Investigation	Robert Giordano	Joe Allio, Christine Maloney	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
8/31/2020	Email RE Personnel Investigation	Joe Allio	Robert Giordano, Christine Maloney	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		
9/25/2020	Email RE Personnel Investigation	Robert Giordano	Christine Maloney, Joe Allio	Penal Code Section 832.7(a): Constitutional Right of Privacy	1	1		

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

9/25/2020	Email RE Personnel Investigation	Robert Godano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/25/2020	Email RE Personnel Investigation	Robert Godano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/25/2020	Email RE Personnel Investigation	Bobby Knight	Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/25/2020	Email RE Personnel Investigation	Joe Allio	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/25/2020	Email RE Personnel Investigation	Joe Allio	Robert Giordano, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/25/2020	Email RE Personnel Investigation	Christine Maloney	Joe Allio, Bobby Knight, Katelyn Knight, Meera Bhatt, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege	1	1		
9/25/2020	Email RE Personnel Investigation	Christine Maloney	Joe Allio, Bobby Knight, Katelyn Knight, Meera Bhatt, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege	1	1		
9/25/2020	Email RE Personnel Investigation	Christine Maloney	Robert Giordano, Joe Allio	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/25/2020	Email RE Personnel Investigation	Christine Maloney	Joe Allio, Bobby Knight, Robert Giordano, Katelyn Knight, Meera Bhatt	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/26/2020	Email RE Personnel Investigation	Joe Allio	Christine Maloney, Bobby Knight, Robert Giordano, Katelyn Knight, Meera Bhatt	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege	1	1		
9/28/2020	Email RE Personnel Investigation	Jonl Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/28/2020	Email RE Personnel Investigation	Angela Knight	Joe Allio, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/28/2020	Email RE Personnel Investigation	Bobby Knight	Jonl Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/28/2020	Email RE Personnel Investigation	Jonl Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/28/2020	Email RE Personnel Investigation	Robert Giordano	Joe Allio, Shawmy Williams, Christine Maloney, Meera Bhatt, Katelyn Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/28/2020	Email RE Personnel Investigation	Robert Giordano	Anne Cardwell, Meera Bhatt, Katelyn Knight, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/28/2020	Email RE Personnel Investigation	Anne Cardwell	Robert Giordano, Meera Bhatt, Katelyn Knight, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/28/2020	Email RE Personnel Investigation	Joe Allio	Angela Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/28/2020	Email RE Personnel Investigation	Christine Maloney	Joe Allio, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/29/2020	Email RE Personnel Investigation	Angela Knight	Joe Allio, Christine Maloney, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/29/2020	Email RE Personnel Investigation	Joe Allio	Christina Maloney, Robert Giordano, Angela Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/1/2020	Email RE Personnel Investigation	Robert Giordano	Shawmy Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/4/2020	Email RE Personnel Investigation	Robert Godano	Shawmy Williams, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

10/4/2020	E-mail RE Personnel Investigation	Shawny Williams	Stephane Sruentes, April Adams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/4/2020	E-mail RE Personnel Investigation	Shawny Williams	Robert Giordano, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/4/2020	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/5/2020	E-mail RE Personnel Investigation	April Adams	Shawny Williams, Stephane Sruentes	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/5/2020	E-mail RE Personnel Investigation	Shawny Williams	Robert Giordano, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/5/2020	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/8/2020	E-mail RE Personnel Investigation	Bobby Knight	Christine Maloney, Katelyn Knight, Meera Bhatt, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/14/2020	E-mail RE Personnel Investigation	Bobby Knight	Christine Maloney, Katelyn Knight, Meera Bhatt, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/15/2020	E-mail RE Personnel Investigation	Robert Giordano	Christine Maloney, Katelyn Knight, Meera Bhatt, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/15/2020	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/15/2020	E-mail RE Personnel Investigation	Bobby Knight	Christine Maloney, Katelyn Knight, Meera Bhatt, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/21/2020	E-mail RE Personnel Investigation	Shawny Williams	Mark Love, Randy J. Risner, Heather E. Ruiz	Attorney client privilege; Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/21/2020	E-mail RE Personnel Investigation	Shawny Williams	Mark Love, Randy J. Risner, Heather E. Ruiz, Christopher Boucher	Attorney client privilege; Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/21/2020	E-mail RE Personnel Investigation	Heather E. Ruiz	Shawny Williams, Mark Love, Randy J. Risner, Christopher Boucher	Attorney client privilege; Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/21/2020	E-mail RE Personnel Investigation	Randy J. Risner	Shawny Williams, Mark Love, Heather E. Ruiz, Christopher Boucher	Attorney client privilege; Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/21/2020	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/23/2020	E-mail RE Personnel Investigation	Jonii Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/23/2020	E-mail RE Personnel Investigation	Robert Giordano	Christine Maloney, Bobby Knight, Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/23/2020	E-mail RE Personnel Investigation	Christine Maloney	Bobby Knight, Robert Giordano, Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/23/2020	E-mail RE Personnel Investigation	Bobby Knight	Christine Maloney, Robert Giordano, Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/23/2020	E-mail RE Personnel Investigation	Jonii Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/28/2020	E-mail RE Personnel Investigation	Jonii Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/28/2020	E-mail RE Personnel Investigation	Jonii Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/28/2020	E-mail RE Personnel Investigation	Jonii Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

11/22/2020	E-mail RE Personnel Investigation	Malli Madsen	Heather Ruiz, Shawny Williams, Mark Love, Randy Risner, Christopher Boucher	Penal Code Section 832.7(a); Constitutional Right of Privacy, Attorney-Client Privilege	1	1		
11/9/2020	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams, Christine Maloney, Anne Cardwell	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
11/9/2020	E-mail RE Personnel Investigation	Shawny Williams	Bobby Knight, Anne Cardwell, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
11/9/2020	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams, Christine Maloney, Anne Cardwell	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
11/9/2020	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
11/12/2020	E-mail RE Personnel Investigation	Bobby Knight	Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
11/12/2020	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
11/13/2020	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
11/18/2020	E-mail RE Personnel Investigation	Bobby Knight	Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
11/18/2020	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
11/25/2020	E-mail RE Personnel Investigation	Joni Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
11/30/2020	E-mail RE Personnel Investigation	Joni Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/1/2020	E-mail RE Personnel Investigation	Bobby Knight	Christine Maloney, Robert Giordano, Katelyn Knight, Meera Bhatt	Penal Code Section 832.7(a); Constitutional Right of Privacy; Attorney-Client Privilege	1	1		
12/2/2020	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight, Christine Maloney, Katelyn Knight, Meera Bhatt	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/2/2020	E-mail RE Personnel Investigation	Bobby Knight	Robert Giordano, Christine Maloney, Katelyn Knight, Meera Bhatt	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/8/2020	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/8/2020	E-mail RE Personnel Investigation	Bobby Knight	Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/8/2020	E-mail RE Personnel Investigation	Michael Kihmm	Bobby Knight, Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/8/2020	E-mail RE Personnel Investigation	Bobby Knight	Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/8/2020	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/8/2020	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/8/2020	E-mail RE Personnel Investigation	Shawny Williams	Robert Giordano, Michael Kihmm, Anne Cardwell	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/9/2020	E-mail RE Personnel Investigation	Shawny Williams	Robert Giordano, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

12/13/2020	Email RE Personnel Investigation	Robert Giordano	Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/13/2020	Email RE Personnel Investigation	Robert Giordano	Shawny Williams, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/13/2020	Email RE Personnel Investigation	Shawny Williams	Robert Giordano, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/13/2020	Email RE Personnel Investigation	Michael Kihmm	Robert Giordano, Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/13/2020	Email RE Personnel Investigation	Michael Kihmm	Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/13/2020	Email RE Personnel Investigation	Robert Giordano	Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/16/2020	Email RE Personnel Investigation	Sharon Abrahamson	Robert Giordano, Michael Rains, Randy Risner, Daria Torres Wong	Attorney client privilege; Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1, 17		15
12/16/2020	Email RE Personnel Investigation	Randy J. Risner	Veronica Nebb, Meera Bhatt, Greg Nyhoff, Anne Cardwell, Shawny Williams, Bob Deis, Heather E Ruiz, Mark Love, Christopher Boucher, Charles Sakai	Attorney client privilege; Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/18/2020	Email RE Personnel Investigation	Robert Giordano	Shawny Williams, Michael Kihmm, Anne Cardwell, Christine Maloney, Randy J. Risner, Veronica Nebb	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/21/2020	Email RE Personnel Investigation	Robert Giordano	Shawny Williams, Angela Knight, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/21/2020	Email RE Personnel Investigation	Michael Kihmm	Robert Giordano, Shawny Williams, Angela Knight, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/21/2020	Email RE Personnel Investigation	Angela Knight	Michael Kihmm, Robert Giordano, Shawny Williams, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/21/2020	Email RE Personnel Investigation	Angela Knight	Michael Kihmm, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/22/2020	Email RE Personnel Investigation	Robert Giordano	Angela Knight, Shawny Williams, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/22/2020	Email RE Personnel Investigation	Angela Knight	Michael Kihmm, Robert Giordano, Shawny Williams, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
1/7/2021	Email RE Personnel Investigation	Bobby Knight	Michael Kihmm, Jason Potts	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
1/7/2021	Email RE Personnel Investigation	Michael Kihmm	Bobby Knight, Jason Potts, Shawny Williams, Joseph Kreins	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
1/25/2021	Email RE Personnel Investigation	Angela Knight	Robert Giordano, Anne Cardwell, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/1/2021	Email thread RE Personnel Investigation	Robert Giordano	Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/1/2021	Email RE Personnel Investigation	Michael Kihmm	Robert Giordano, Christine Maloney, Shawny Williams, Anne Cardwell	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/1/2021	Email RE Personnel Investigation	Michael Kihmm	Bobby Knight, Joni Brown, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/1/2021	Email RE Personnel Investigation	Robert Giordano	Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

2/11/2021	E-mail RE Personnel Investigation	Michael Kihmm	Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/11/2021	E-mail RE Personnel Investigation	Robert Giordano	Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/8/2021	E-mail RE Personnel Investigation	Robert Giordano	Michael Kihmm, Bobby Knight, Anne Cardwell, Shawny Williams, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/8/2021	E-mail RE Personnel Investigation	Bobby Knight	Robert Giordano, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/9/2021	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/9/2021	E-mail RE Personnel Investigation	Robert Giordano	Michael Kihmm, Bobby Knight, Shawny Williams, Anne Cardwell, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/9/2021	E-mail RE Personnel Investigation	Bobby Knight	Robert Giordano, Shawny Williams, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/9/2021	E-mail RE Personnel Investigation	Bobby Knight	Maili Madsen, Michael Kihmm, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/9/2021	E-mail RE Personnel Investigation	Maili Madsen	Bobby Knight, Michael Kihmm, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/9/2021	E-mail RE Personnel Investigation	Bobby Knight	Michael Kihmm, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/9/2021	E-mail RE Personnel Investigation	Michael Kihmm	Bobby Knight, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/9/2021	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight, Michael Kihmm, Shawny Williams, Anne Cardwell, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/10/2021	E-mail RE Personnel Investigation	Bobby Knight	Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/10/2021	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/11/2021	E-mail RE Personnel Investigation	Bobby Knight	Robert Giordano, Michael Kihmm, Shawny Williams, Anne Cardwell, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/11/2021	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/16/2021	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/16/2021	E-mail RE Personnel Investigation	Bobby Knight	Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
2/16/2021	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
4/28/2021	E-mail RE Personnel Investigation	Robert Giordano	Michael Kihmm, Bobby Knight, Anne Cardwell, Shawny Williams, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
4/28/2021	E-mail RE Personnel Investigation	Michael Kihmm	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
4/29/2021	E-mail RE Personnel Investigation	Bobby Knight	Andrew Bates, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
4/29/2021	E-mail RE Personnel Investigation	Bobby Knight	Andrew Bates, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
4/29/2021	E-mail RE Personnel Investigation	Bobby Knight	Andrew Bates, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

4/29/2021	Email RE Personnel Investigation	Bobby Knight	Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
4/29/2021	Email RE Personnel Investigation	Michael Kihmm	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
4/29/2021	Email RE Personnel Investigation	Bobby Knight	Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
4/29/2021	Email RE Personnel Investigation	Michael Kihmm	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/3/2021	Email RE Personnel Investigation	Andrew Bates	Bobby Knight, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/3/2021	Email RE Personnel Investigation	Andrew Bates	Bobby Knight, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/4/2021	Email RE Personnel Investigation	Andrew Bates	Bobby Knight, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/4/2021	Email RE Personnel Investigation	Bobby Knight	Andrew Bates, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/4/2021	Email RE Personnel Investigation	Bobby Knight	Andrew Bates, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/4/2021	Email RE Personnel Investigation	Andrew Bates	Bobby Knight, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/5/2021	Email RE Personnel Investigation	Bobby Knight	Andrew Bates, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/5/2021	Email RE Personnel Investigation	Andrew Bates	Bobby Knight, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/5/2021	Email RE Personnel Investigation	Bobby Knight	Michael Kihmm, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/5/2021	Email RE Personnel Investigation	Robert Giordano	Bobby Knight, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/5/2021	Email RE Personnel Investigation	Bobby Knight	Robert Giordano, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/5/2021	Email RE Personnel Investigation	Robert Giordano	Michael Kihmm, Bobby Knight, Shawny Williams, Anne Cardwell, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/5/2021	Email RE Personnel Investigation	Andrew Bates	Bobby Knight, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/5/2021	Email RE Personnel Investigation	Bobby Knight	Andrew Bates, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/5/2021	Email RE Personnel Investigation	Andrew Bates	Bobby Knight, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/5/2021	Email RE Personnel Investigation	Robert Giordano	Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/5/2021	Email RE Personnel Investigation	Michael Kihmm	Robert Giordano, Bobby Knight, Shawny Williams, Anne Cardwell, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/5/2021	Email RE Personnel Investigation	Robert Giordano	Michael Kihmm, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/6/2021	Email RE Personnel Investigation	Robert Giordano	Bobby Knight, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

5/6/2021	E-mail RE Personnel Investigation	Bobby Knight	Robert Giordano, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/6/2021	E-mail RE Personnel Investigation	Andrew Bales	Bobby Knight, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/6/2021	E-mail RE Personnel Investigation	Michael Kihmm	Robert Giordano, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/6/2021	E-mail RE Personnel Investigation	Michael Kihmm	Robert Giordano, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/7/2021	E-mail RE Personnel Investigation and Interviews	Robert Giordano	Michael Kihmm, Anne Cardwell, Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/7/2021	E-mail RE Personnel Investigation and Interviews	Michae Kihmm	Joni Brown, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/8/2021	E-mail RE Personnel Investigation and Interviews	Bobby Knight	Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/8/2021	E-mail RE Personnel Investigation and Interviews	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/11/2021	E-mail RE Personnel Investigation and Interviews	Robert Giordano	Michael Kihmm, Anne Cardwell, Shawny Williams, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/11/2021	E-mail RE Personnel Investigation	Mall Madsen	Michael Kihmm, Armond Sarkis, Bobby Knight, Anne Cardwell, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/11/2021	E-mail RE Personnel Investigation and Interviews	Bobby Knight	Michael Kihmm, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/11/2021	E-mail RE Personnel Investigation and Interviews	Michael Kihmm	Armond Sarkis, Mall Madsen, Bobby Knight, Anne Cardless, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/11/2021	E-mail RE Personnel Investigation and Interviews	Michael Kihmm	Mall Madsen, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/11/2021	E-mail RE Personnel Investigation and Interviews	Bobby Knight	Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/11/2021	E-mail RE Personnel Investigation and Interviews	Joni Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/11/2021	E-mail RE Personnel Investigation and Interviews	Bobby Knight	Robert Giordano, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/12/2021	E-mail RE Personnel Investigation and Interviews	Robert Giordano	Bobby Knight, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/12/2021	E-mail RE Personnel Investigation and Interviews	Bobby Knight	Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/12/2021	E-mail RE Personnel Investigation and Interviews	Bobby Knight	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/12/2021	E-mail RE Personnel Investigation and Interviews	Joni Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/12/2021	E-mail RE Personnel Investigation and Interviews	Bobby Knight	Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/12/2021	E-mail RE Personnel Investigation and Interviews	Joni Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/12/2021	E-mail RE Personnel Investigation and Interviews	Robert Giordano	Shawny Williams, Michael Kihmm, Christine Maloney, Anne Cardwell	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/17/2021	E-mail RE Personnel Investigation and Interviews	Mall Madsen	Michael Kihmm, Armond Sarkis, Bobby Knight, Anne Cardwell, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

5/18/2021	E-mail RE Personnel Investigation and Interviews	Robert Giordano	Michael Kimm, Bobby Knight, Anne Cardwell	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/21/2021	E-mail RE Personnel Investigation and Interviews	Bobby Knight	Robert Giordano, Michael Kimm, Anne Cardwell	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/22/2021	E-mail RE Personnel Investigation and Interviews	Robert Giordano	Bobby Knight, Michael Kimm, Anne Cardwell	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/24/2021	E-mail RE Personnel Investigation and Interviews	Bobby Knight	Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/24/2021	E-mail RE Personnel Investigation and Interviews	Joni Brown	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/24/2021	E-mail RE Personnel Investigation and Interviews	Bobby Knight	Robert Giordano, Michael Kimm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/24/2021	E-mail RE Personnel Investigation and Interviews	Bobby Knight	Robert Giordano, Michael Kimm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/24/2021	E-mail RE Personnel Investigation and Interviews	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/25/2021	E-mail RE Personnel Investigation and Interviews	Robert Giordano	Bobby Knight, Michael Kimm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/25/2021	E-mail RE Personnel Investigation and Interviews	Robert Knight	Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/25/2021	E-mail RE Personnel Investigation and Interviews	Bobby Knight	Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
5/25/2021	E-mail RE Personnel Investigation and Interviews	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/3/2021	E-mail RE Personnel Investigation	Robert Giordano	Michael Kimm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/3/2021	E-mail RE Personnel Investigation	Michael Kimm	Robert Giordano, Shawny Williams, Anne Cardwell, Bobby Knight, Monica Gomez	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/7/2021	E-mail RE Personnel Investigation	Monica Gomez	Robert Giordano, Michael Kimm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/7/2021	E-mail RE Personnel Investigation	Robert Giordano	Monica Gomez, Michael Kimm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/7/2021	E-mail RE Personnel Investigation	Robert Giordano	Michael Kimm, Shawny Williams, Anne Cardwell	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/7/2021	E-mail RE Personnel Investigation	Michael Kimm	Bobby Knight, Joni Brown, Anne Cardwell, Shawny Williams, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/15/2021	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight, Michael Kimm, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/16/2021	E-mail RE Personnel Investigation	Joni Brown	Robert Giordano, Michael Kimm, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/16/2021	E-mail RE Personnel Investigation	Robert Giordano	Joni Brown, Bobby Knight, Michael Kimm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/16/2021	E-mail RE Personnel Investigation	Joni Brown	Robert Giordano, Michael Kimm, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/16/2021	E-mail RE Personnel Investigation	Robert Giordano	Joni Brown, Bobby Knight, Michael Kimm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/16/2021	E-mail RE Personnel Investigation	Joni Brown	Robert Giordano, Michael Kimm, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

6/18/2021	E-mail thread RE Personnel Investigation	Robert Giordano	Drew Ramsay, Shawny Williams, Todd Tribble, Michael Kihmm, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/22/2021	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/22/2021	E-mail RE Personnel Investigation	Bobby Knight	Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
6/22/2021	E-mail RE Personnel Investigation	Robert Giordano	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/7/2021	E-mail RE Personnel Investigation	Robert Giordano	Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/7/2021	E-mail RE Personnel Investigation	Michael Kihmm	Robert Giordano, Shawny Williams, Anne Cardwell	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/7/2021	E-mail RE Personnel Investigation	Monica Gomez	Michael Kihmm, Robert Giordano, Shawny Williams, Anne Cardwell, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/7/2021	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/7/2021	E-mail RE Personnel Investigation	Robert Giordano	Monica Gomez, Robert Giordano, Shawny Williams, Anne Cardwell, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/8/2021	E-mail RE Personnel Investigation	Michael Kihmm	Robert Giordano, Joni Brown, Bobby Knight, Shane Bower, Shawny Williams, Anne Cardwell, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/8/2021	E-mail RE Personnel Investigation	Robert Giordano	Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/8/2021	E-mail RE Personnel Investigation	Andrew Bates	Bobby Knight, Shane Bower, Bonnie L. Mirante, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/8/2021	E-mail RE Personnel Investigation	Joni Brown	Bobby Knight, Shane Bower, Bonnie L. Mirante, Andrew Bates	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/8/2021	E-mail RE Personnel Investigation	Shane Bower	Bobby Knight, Joni Brown, Bonnie L. Mirante, Andrew Bates	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/8/2021	E-mail RE Personnel Investigation	Monica Gomez	Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/8/2021	E-mail RE Personnel Investigation	Joni Brown	Bobby Knight, Shane Bower, Bonnie L. Mirante, Andrew Bates	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/8/2021	E-mail RE Personnel Investigation	Joni Brown	Bobby Knight, Shane Bower, Bonnie L. Mirante, Andrew Bates	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/8/2021	E-mail RE Personnel Investigation	Joni Brown	Shane Bower, Andrew Bates, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/9/2021	E-mail RE Personnel Investigation	Bonnie L. Mirante	Andrew Bates, Joni Brown, Shane Bower, Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/12/2021	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/12/2021	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/13/2021	E-mail RE Personnel Investigation	Andrew Bates	Bobby Knight, Shane Bower, Bonnie L. Mirante, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/13/2021	E-mail RE Personnel Investigation	Andrew Bates	Bonnie L. Mirante, Bobby Knight, Shane Bower, Joni Brown	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
7/13/2021	E-mail RE Personnel Investigation	Bobby Knight	Robert Giordano, Michael Kihmm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		



ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

8/17/2021	E-mail Thread RE Personnel Investigation	Katelyn Knight	Robert Giordano	Penal Code Section 832.7(a); Attorney-Client Privilege	1	1		
8/17/2021	E-mail Thread RE Personnel Investigation	Katelyn Knight	Robert Giordano, Shawny Williams, Michael Kimm, Veronica Nebb	Penal Code Section 832.7(a); Attorney-Client Privilege	1	1		
8/18/2021	E-mail RE Personnel Investigation	Michael Kimm	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
8/18/2021	E-mail RE Personnel Investigation	Bobby Knight	Michael Kimm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
8/18/2021	E-mail RE Personnel Investigation	Bobby Knight	REDACTED	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
8/19/2021	E-mail RE Personnel Investigation	REDACTED	Bobby Knight, Michael Kimm, Robert Giordano	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
8/23/2021	E-mail Thread RE Investigation Contract	Katelyn Knight	Monica Gomez, Michael Kimm, Veronica Nebb, Ayat Bitlagi, Bonnie Mirante, Yanira Osorio	Penal Code Section 832.7(a); Attorney-Client Privilege	1	1		
8/28/2021	Investigation Report			Penal Code Section 832.7(a); Constitutional Right of Privacy	1, 3	1, 19	17.1	3, 5-6, 8, 10-12, 17-20, 22
9/3/2021	E-mail RE Personnel Investigation	Robert Giordano	Katelyn Knight	Penal Code Section 832.7(a); Attorney-Client Privilege	1	1		
9/3/2021	E-mail RE Personnel Investigation	Katelyn Knight	Robert Giordano	Penal Code Section 832.7(a); Attorney-Client Privilege	1	1		
9/7/2021	E-mail RE Personnel Investigation	Katelyn Knight	Robert Giordano	Penal Code Section 832.7(a); Attorney-Client Privilege	1	1		
9/8/2021	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/8/2021	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/8/2021	Investigation Report			Penal Code Section 832.7(a); Constitutional Right of Privacy	1, 3	1, 19	17.1	3, 5-6, 8, 10-12, 17-20, 22
9/28/2021	E-mail RE Personnel Investigation	Robert Giordano	Monica Gomez, Shawny Williams, Michael Kimm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
9/30/2021	Supplemental Investigation Report			Penal Code Section 832.7(a); Constitutional Right of Privacy	1, 3	1, 19	17.1	17-19, 22
9/30/2021	E-mail Thread RE Personnel Investigation	Robert Giordano	Katelyn Knight, Shawny Williams	Penal Code Section 832.7(a); Attorney-Client Privilege	1	1		
10/1/2021	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams, Christine Maloney	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
10/4/2021	E-mail RE Personnel Investigation	Robert Giordano	Shawny Williams	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
11/16/2021	E-mail RE Personnel Investigation	Meera Bhatt	Veronica Nebb, Randy Risner, Elinore Regressado, Deena York, Katelyn Knight	Penal Code Section 832.7(a); Attorney-Client Privilege	1	1, 17		15
12/13/2021	E-mail RE Personnel Investigation	Bobby Knight	REDACTED, Robert Giordano, Michael Kimm	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/13/2021	E-mail RE Personnel Investigation	Bobby Knight	Jason Ta	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
12/13/2021	E-mail RE Personnel Investigation	Jason Ta	Bobby Knight	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

2/15/2022	Email RE Personnel Investigation	Randy J Risner	Shawny Williams, Mike Malone, Terrance Davis, Veronica Nebb, Carmen Valdez, Stephanie Sifuentes	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1, 17	15
2/22/2022	Email RE Personnel Investigation	Christopher Boucher	Randy J Risner	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1, 17	15
5/4/2022	Email RE Personnel Investigation	Michael L. Rains	Randy J Risner, Sharon Abrahamson	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/5/2022	Email RE Personnel Investigation	Randy J Risner	Michael Rains, Sharon Abrahamson	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
5/5/2022	Email RE Personnel Investigation	Randy J Risner	Mike Malone, Shawny Williams, Jason Ta	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
6/27/2022	Email RE Personnel Investigation	Randy J Risner	Shawny Williams, Jason Ta, Mike Malone, Veronica Nebb	Attorney client privilege	1	1	
7/12/2022	Email RE Personnel Investigation	Shawny Williams	Randy J Risner, Jason Ta, Veronica Nebb, Mike Malone	Attorney client privilege	1	1	
8/9/2022	Email RE Personnel Investigation	Sharon Abrahamson	Randy J Risner	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
8/9/2022	Email RE Personnel Investigation	Sharon Abrahamson	Randy J Risner	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
8/9/2022	Email RE Personnel Investigation	Randy J Risner	Aaron Slater, Veronica Nebb, Rachel Ferguson, Carmen	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
8/9/2022	Email RE Personnel Investigation	Rachel Ferguson	Randy J Risner, Veronica Nebb, Mike Malone, Aaron Slater, Carmen Valdez	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
8/9/2022	Email RE Personnel Investigation	Randy J Risner	Rachel Ferguson, Veronica Nebb, Mike Malone, Aaron Slater, Carmen Valdez	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
8/12/2022	Email RE Personnel Investigation	Shawny Williams	Randy J Risner, Jason Ta	Attorney client privilege	1	1	
8/15/2022	Email RE Personnel Investigation	Randy J Risner	Shawny Williams, Jason Ta	Attorney client privilege	1	1	
8/16/2022	Email RE Personnel Investigation	Aaron Slater	Randy J Risner, Veronica Nebb, Rachel Ferguson, Carmen	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
8/18/2022	Email RE Personnel Investigation	Aaron Slater	Randy J Risner, Veronica Nebb, Rachel Ferguson, Carmen	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
8/18/2022	Email RE Personnel Investigation	Randy J Risner	Aaron Slater, Veronica Nebb, Rachel Ferguson, Carmen	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
8/18/2022	Email RE Personnel Investigation	Randy J Risner	Randy J Risner, Veronica Nebb, Rachel Ferguson, Carmen	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
8/18/2022	Email RE Personnel Investigation	Aaron Slater	Randy J Risner, Veronica Nebb, Rachel Ferguson, Carmen	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
8/18/2022	Email RE Personnel Investigation	Randy J Risner	Aaron Slater, Veronica Nebb, Rachel Ferguson, Carmen	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
8/18/2022	Email RE Personnel Investigation	Randy J Risner	Aaron Slater, Veronica Nebb, Rachel Ferguson, Carmen	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	
9/7/2022	Email RE Personnel Investigation	Aaron Slater	Randy J Risner, Veronica Nebb, Rachel Ferguson, Carmen	Attorney client privilege: Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1	

ACLU v. CITY OF VALLEJO  
 SOLANO COUNTY SUPERIOR COURT CASE NO.: FCS059257  
 DEFENDANT'S PRIVILEGE LOG

11/8/2022	Email RE Personnel Investigation	Jodi Brown	Teresa Olson, Katelyn Knight	Penal Code Section 832.7(a); Attorney-Client Privilege	1	1		
3/22/2023	Email RE Personnel Investigation	Carmen Valdez	Katelyn Knight, Randy Risner, Terrance Davis	Penal Code Section 832.7(a); Attorney-Client Privilege	1	1		
Various	Emails RE Closing Documents	Various	Various	Penal Code Section 832.7(a); Constitutional Right of Privacy	1	1		
Various	Witness Interview Notices			Penal Code Section 832.7(a); Constitutional Right of Privacy	1, 3	1, 19	17.1	17-18, 22
Various	Subject Interview Notices			Penal Code Section 832.7(a); Constitutional Right of Privacy	1, 3	1, 19	17.1	17-18, 22
Various	Audio Files of Interviews			Penal Code Section 832.7(a); Constitutional Right of Privacy	1, 3	1, 19	17.1	3, 5-6, 8, 10-12, 17-20, 22
Various	Transcripts of Interviews			Penal Code Section 832.7(a); Constitutional Right of Privacy	1, 3	1, 19	17.1	3, 5-6, 8, 10-12, 17-20, 22
Various	Attachments to Investigation Report			Penal Code Section 832.7(a); Constitutional Right of Privacy	1, 3	1, 19	17.1	5, 6, 17-20, 22
Various	Closing Documents			Penal Code Section 832.7(a); Constitutional Right of Privacy	1, 3	1, 19	17.1	16, 17-18, 22