

## Jasmine Cuenco

---

**From:** [REDACTED]  
**Sent:** Friday, January 29, 2021 6:14 PM  
**To:** Chris Sansoe  
**Cc:** Dan Cabral; Kevin M Bell; Ryan Wagner; Laura Delehunt  
**Subject:** Re: Dillahunty 5-191852-3 informal request for discovery - RACIAL JUSTICE ACT

Chris,

Thank you for the update. Let's follow the same course of action as the last case. Please keep us updated.

Thank you - and have a good weekend everyone.

Venus

**Venus D. Johnson**  
**Chief Assistant District Attorney**  
**Contra Costa County District Attorney's Office**

On Jan 29, 2021, at 5:11 PM, Chris Sansoe [REDACTED] wrote:

Hello Everyone,

Mr. Ashe just filed the attached Discovery Request pursuant to the Racial Justice Act.

For background - this Defendant and his accomplice committed a planned and calculated robbery of the bowling alley at the Concord Mall. Dillahunty was a security guard there and the inside man. He allowed Timmons and an unknown third part to enter and rob the business.

Both Defendants had recently been paroled from their second strike offense where they each did 15 years.

In court this week an offer of 12 yrs was made to each defendant to resolve this case. Mr. Ashe wanted probation and prison suspended. I refused and now we have this discovery request being served upon us.

I plan to adapt the prior declarations used in the Vargas case and submit those for this case with my refusal to provide discovery.

Please let me know if there are any other actions I should take.

Thank you,

Chris

Sent from my iPhone

Begin forwarded message:

**From:** Anthony Ashe [REDACTED]  
**Date:** January 29, 2021 at 4:21:40 PM PST  
**To:** Chris Sansoe [REDACTED], Brian Feinberg  
<BFeinberg@contracostada.org>  
**Subject: Dillahunty 5-191852-3 informal request for discovery - RACIAL JUSTICE ACT**

Colleagues:

Please review the attached document as an informal request for discovery.

A case of first impression for me.

Ashe

<DILLAHUNTY.RJA.PDF>