

## Jacqueline Vizcarrondo

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**From:** Chris Sansoe  
**Sent:** Monday, February 1, 2021 1:19 PM  
**To:** Max Laettner; Venus D. Johnson  
**Cc:** Ryan Wagner; Jason Peck  
**Subject:** RE: Racial Justice Act Request  
**Attachments:** People's response to Motion to Compel.doc; dan cabral declaration (002).doc; declaration for data.doc

Hello,

Unfortunately I had to deal with this issue quite a bit already. I am attaching my response from the Vargas case (05-192292-1). I am also attaching the declarations we filed in that case. We were in front of Judge Burch for this one. He denied the request.

I received the same request from Ashe for the same charge- PC 209(b). I am formulating a response now and will also be using the data declaration again.

Let me know if you have any questions.

Chris

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**From:** Max Laettner [REDACTED]  
**Sent:** Monday, February 1, 2021 9:36 AM  
**To:** Chris Sansoe [REDACTED]; Venus D. Johnson [REDACTED]  
**Cc:** Ryan Wagner [REDACTED]; Jason Peck [REDACTED]  
**Subject:** Racial Justice Act Request

Good morning all,

I just received the attached motion from Tony Ashe requesting disclosures under the Racial Justice Act. I spoke with Chris and Ryan, who told me we have responded to a few of these and that I should alert Venus. I've attached the defense motion, as well as the CDAA template response that Ryan gave me.

My case is currently set for trial on 3/8 with RC on 2/10. Please advise if there is a uniform response from our office that I should be using.

Thank you,  
Max

**Max Laettner**  
Deputy District Attorney  
Contra Costa County



