

## Jacqueline Vizcarrondo

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**From:** Scott Alonso  
**Sent:** Thursday, March 4, 2021 1:59 PM  
**To:** Hannah M. Shafsky  
**Subject:** Re: Scott Alonso shared the folder "Racial Justice Act - Kelly Moran PRA March 4 to County Counsel" with you.

Thank you! I will give you a ring to discuss thanks

Sent from my iPhone

On Mar 4, 2021, at 10:05 AM, Hannah M. Shafsky [REDACTED] wrote:

Hi Scott,

I took a quick look at these emails. From my perspective, with the exception of two documents that include initial emails from defense attorneys, the documents constitute attorney work product. The emails include attorney mental impressions, case theories, strategies, and legal research, both generally (Venus' email to all attorneys) and specific to a couple of pending criminal cases. The portions of the two strings that consist only of the defense attorney emails are not work product, but the portions that include the forwards/internal discussions, appear as work product to me. It is up to your office whether to release any of the work product materials. It's also not clear to me from the request whether the requestor is seeking the defense/DA communications regarding specific cases, or more broad-based information.

Based on Venus' email, your office has materials from the CDAA that may be responsive. Your office likely paid for these materials and they are also likely copyrighted by the CDAA. Other records potentially responsive could be the court-filed documents in the cases.

Hannah

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**From:** Scott Alonso [REDACTED] >  
**Sent:** Thursday, March 4, 2021 9:17 AM  
**To:** Hannah M. Shafsky [REDACTED]  
**Subject:** Scott Alonso shared the folder "Racial Justice Act - Kelly Moran PRA March 4 to County Counsel" with you.

Here's the folder that Scott Alonso shared with you.

— This link only works for the direct recipients of this message.

Racial Justice Act - Kelly Moran PRA March 4 to County Counsel

Open

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