

From: [Scott Alonso](#)
To: [Hannah M. Shafsky](#)
Subject: Draft Moran Response Letter
Date: Tuesday, March 16, 2021 4:03:00 PM
Attachments: [2021 PRA Moran March 17.doc](#)
[Re hewitt slaughter williams RJA request.msg](#)
[Re INFORMAL REQUEST FOR DISCOVERY - RACIAL JUSTICE ACT - NACARRE TURNER J20-00481.msg](#)

Hi Hannah here are the two emails that we would produce and the draft response letter. The deadline is tomorrow.

Do we need to redact the internal DA discussion and just leave in the original defense counsel note to the DDA?

Thanks for your help,

sa

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OFFICE OF THE DISTRICT ATTORNEY
CONTRA COSTA COUNTY

Diana Becton
DISTRICT ATTORNEY

March 17, 2021

Kelly Moran
kmoran1@scu.edu

RE: Inquiry, February 17th

Dear Kelly Moran:

This is the response of the Office of the District Attorney to your inquiry dated February 17, 2021. A copy of your inquiry is attached in this PDF as reference. On February 19th, you clarified you were seeking these records under the Public Records Act. On March 4, our office asked for an extension to respond and search for any records.

Attached in this email are records responsive to your request. We did locate other records that are exempt from disclosure. The information contained in the exempt records constitutes attorney work product (Code Civ. Proc., § 2018.030; Pen. Code, § 1054.6; Gov. Code, § 6254(k)). The necessity of preserving the confidentiality of information obtained by the District Attorney's Office in confidence related to criminal matters, which if released, would interfere with the District Attorney's core prosecutorial and investigative functions, and impede District Attorney representatives in the performance of their obligations, outweighs the necessity for disclosure of the information in the interest of justice.

This completes our office's response to your request.

Respectfully,

Scott Alonso
Public Information Officer
Office of the District Attorney
925-957-8638 office

From: [Venus D. Johnson](#)
To: [Max Laettner](#)
Cc: [Ryan Wagner](#); [Jason Peck](#); [Scott Alonso](#)
Subject: Re: hewitt / slaughter / williams RJA request?
Date: Wednesday, February 3, 2021 1:48:33 PM

Hi Max -

I have not read through the informal discovery request, but Chris Sansoe dealt with his exact issue. It depends on what the request is. Please confer with Chris and then Ryan to ensure that 1) we do or don't not collect the information and 2) whether you want to object because the information is not relevant to the case.

Please include Scott on the email chains as well - as he deals directly with these issues when they turn into PRA requests.

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

On Feb 3, 2021, at 11:01 AM, Max Laettner <Max.Laettner@contracostada.org> wrote:

FYI – received this in addition to Ashe's motion from Hsieh at the ADO's office.
Is our response to these informal requests just that we do not have the information requested available?

Thanks,
Max

From: Jesse Hsieh <Jesse.Hsieh@pd.cccounty.us>
Sent: Wednesday, February 3, 2021 10:58 AM
To: Max Laettner <Max.Laettner@contracostada.org>
Cc: 'anthonyash@comcast.net' <anthonyash@comcast.net>; Anthony Ashe <anthony.ashe@icloud.com>; Jon Renge <jrenge@tully-weiss.com>
Subject: hewitt / slaughter / williams RJA request?

Hi Max,

I am informed that Tony sent an informal discovery request seeking records relevant to a possible Racial Justice Act claim per PC 745(a). I join that request. I can also send something written to clarify the records that I seek.

To that end, do you (or your office generally) have a position on that request?

Jesse Hsieh (he/him/his)

Deputy Alternate Defender

Contra Costa County

From: [Venus D. Johnson](#)
To: [Jordan Sanders](#)
Cc: [Ryan Wagner](#); [Scott Alonso](#); [Chris Sansoe](#); [Max Laettner](#); [Jason Peck](#)
Subject: Re: INFORMAL REQUEST FOR DISCOVERY - RACIAL JUSTICE ACT - NACARRE TURNER J20-00481
Date: Tuesday, February 2, 2021 10:56:51 AM

Good morning Jordan -

Yes, pursuant to the email I sent out a few weeks ago - the protocol is to alert me when a discovery motion is sent to us. Chris now has two of these and Max was just served with one. Chris has already successfully litigated one of these.

Please confer with Chris and keep this chain posted on the developments in the case. I am tracking these motions office wide.

Thank you,

Venus

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

On Feb 2, 2021, at 10:23 AM, Jordan Sanders <JSanders@contracostada.org> wrote:

Bringing this to your attention, as I've been told you are tracking these types of requests. I will speak to my colleagues on how to respond (as I understand you/the office may have already provided such guidance).

Jordan

-----Original Message-----

From: Anthony Ashe <anthony.ashe@icloud.com>
Sent: Friday, January 29, 2021 4:52 PM
To: Jordan Sanders <JSanders@contracostada.org>
Subject: INFORMAL REQUEST FOR DISCOVERY - RACIAL JUSTICE ACT - NACARRE TURNER J20-00481

Mr. Sanders:

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

A case of first impression for me.

Ashe

<TURNER.RJA.INFORMAL.PDF>