

## Jasmine Cuenco

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**From:** Chris Sansoe  
**Sent:** Wednesday, March 24, 2021 1:00 PM  
**To:** Chris Walpole  
**Cc:** Chad Mahalich  
**Subject:** Racial Justice Act - PC 745 Materials  
**Attachments:** AB 2542 Briefing.pdf; Cabral Dec final.pdf; Compel Disco - Notice & P&A.pdf; Data Declaration final.pdf; Dec.YHuang Re MTC Final w Exhibits.pdf; AB-2542-PC745-Motion-Template-CDAА-FINAL-1.docx

Hello,

You have asked for my materials concerning the Racial Justice Motion/PC 745 Discovery Motion I recently litigated. I am providing the following attachments:

1. My briefing submitted to D23 in P v. Vargas et. Al (05-192292-1) – in this you can see an attachment with Defense’s request for discovery which is ridiculous
2. Dan Cabral’s declaration regarding our trainings and policies
3. Defense Counsel – Yolanda Huang’s Motion to Compel Discovery
4. Nanette Wellman’s data declaration regarding what data our office maintains
5. Defense Counsel’s declaration to support her motion
6. Transcript of Judge Burch’s ruling concerning the 2<sup>nd</sup> racial justice motion
7. A word template provided to me by Wagner from the CDAА

This issue was also briefed and litigated by Jordan Sanders in the context of a juvenile transferred to adult land.

Let me know if there is anything else you need.

Chris Sansoe  
Deputy District Attorney  
Contra Costa County

