

Jasmine Cuenco

From: Dana Filkowski
Sent: Friday, March 26, 2021 5:09 PM
To: Chris Sansoe
Cc: Nichelle Holmes; Scott Alonso; Venus D. Johnson
Subject: FW: 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-CDAA-FINAL-1.docx

Thanks for being such a great Team Player Chris!!!

Nichelle – here’s stuff we can use in anticipation of the motion that PD Hernandez intends to file. Remember that we need to send it to Venus and Scott for review before we respond to ensure uniformity, consistency and compliance with public information act stuff.

Dana L. Filkowski

Supervising Deputy District Attorney
Human Trafficking Unit / Human Trafficking Task Force
Contra Costa County District Attorney

From: Chris Sansoe [REDACTED]
Sent: Friday, March 26, 2021 9:05 AM
To: Dana Filkowski [REDACTED]
Subject: FW: Racial Justice Act - PC 745 Materials

Here you go

From: Chris Sansoe
Sent: Wednesday, March 24, 2021 1:00 PM
To: Chris Walpole [REDACTED]
Cc: Chad Mahalich [REDACTED]
Subject: Racial Justice Act - PC 745 Materials

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 2nd racial justice motion

7. A word template provided to me by Wagner from the CDAA

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

