

## Jacqueline Vizcarrondo

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**From:** [REDACTED]  
**Sent:** Saturday, March 27, 2021 6:35 PM  
**To:** Nichelle Holmes  
**Subject:** Re: Racial Justice Act - PC 745 Materials

Hi there can you call me about this one? Monday work okay? Hope all is well,

Scott

Sent from my iPhone

On Mar 27, 2021, at 9:38 AM, Nichelle Holmes [REDACTED] > wrote:

Thank you Chris

Sent from my iPhone

On Mar 26, 2021, at 5:18 PM, Scott Alonso [REDACTED] wrote:

Thanks Dana and Chris.

Copying Ryan here too he can assist with these.

sa

**Scott Alonso**  
Public Information Officer  
Office of the District Attorney  
Contra Costa County  
[REDACTED]

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**From:** Dana Filkowski [REDACTED] >  
**Sent:** Friday, March 26, 2021 5:09 PM  
**To:** Chris Sansoe [REDACTED]  
**Cc:** Nichelle Holmes [REDACTED]; Scott Alonso [REDACTED]; Venus D. Johnson [REDACTED] >  
**Subject:** FW: Racial Justice Act - PC 745 Materials

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

[REDACTED]

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**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

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**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 2<sup>nd</sup> 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

[REDACTED]

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