

Jasmine Cuenco

To: Ryan Wagner
Cc: Aron DeFerrari
Subject: PC 745 motions
Attachments: People's Response to PC 745 Motion 6.29.21.docx; PC 745d response 6.29.2021.docx

Ryan,

Finally finished both motions. [See attached]
Thanks talking me through a couple issues and helping me out on this case.

One motion responds to the defense's PC 745(a)(2) motion.
The other motion responds to the PC 745(d) motion.

In the PC 745(d) motion, one of the things they specifically request is all trainings on the use of rap music/lyrics.
To my memory, Aron did a gang training years ago.
He send me that training power point slide recently so I could see if there is any reference to using rap lyrics or searching for rap/music video.
I did not see any.
And to my memory, I am fairly certain that this is the only gang training we did (where there may even be a remote chance that rap lyrics/music videos would be referenced).
As such, I put in the PC 745d motion that no training on rap lyrics exist.

Just wanted to flag that issue for you if you have a different recollection.

Can you review, sign, file, and email a courtesy copy of both of these motions? [D. 36]
And I know we already talked about our response, but feel free to his me up if you think we need to make any last minute substantive changes.
Our responses are due Wednesday.

[I don't have a template for a request to exceed the work count. Hopefully you can help me out on this as well]

Thanks again,
Chris