

Jasmine Cuenco

From: [REDACTED]
Sent: Wednesday, June 30, 2021 10:04 AM
To: Ryan Wagner
Subject: Re: Discovery

Just tried you - give me a ring when you can thanks I'm open until 4pm CA time. Thanks

Sent from my iPhone

On Jun 30, 2021, at 10:06 AM, Ryan Wagner [REDACTED] > wrote:

Works for me! Thanks

On Jun 30, 2021, at 8:05 AM, Scott Alonso [REDACTED] wrote:

Hi Ryan agreed and all good. Can I call you at 10am your time? Thanks

Sent from my iPhone

On Jun 30, 2021, at 8:37 AM, Ryan Wagner [REDACTED] wrote:

Sure, I am available to chat later this morning, but I think that someone needs to chat directly with Chad since it is his motion and he will be more aware of the specific questions that need to be answered. Sorry to bug you on your vacation. Feel free to point me to another contact. Thanks

From: Scott Alonso [REDACTED]
Sent: Wednesday, June 30, 2021 6:18 AM
To: Ryan Wagner <[REDACTED]>
Subject: Re: Discovery

Hi Ryan there will be a Vera report. But I don't think I'm the one to make that call to what goes in his response. Can we chat by phone?
Thanks

Sent from my iPhone

On Jun 29, 2021, at 10:07 PM, Ryan Wagner

[REDACTED] wrote:

None of us know about this Vera stuff, so I will let you sort it out with Chad about what to put in his motion that is responsive. I would check with him on his timing.

Best,

Ryan

From: Scott Alonso [REDACTED]
Sent: Tuesday, June 29, 2021 7:57 PM
To: Ryan Wagner [REDACTED]
Subject: Fwd: Discovery

Hi there I'm back next Tuesday July 6 if urgent I can speak by cell tomorrow let me know thanks

Scott

Sent from my iPhone

Begin forwarded message:

From: Chad Mahalich
[REDACTED]
Date: June 29, 2021 at 10:49:58 AM
CDT
To: Ryan Wagner
[REDACTED], Scott
Alonso
[REDACTED],
Jason Peck
[REDACTED], Chris
Walpole
[REDACTED]
Subject: FW: Discovery

Please see point #4 (Ryan & Scott). Chris asked that I forward this email to you, to determine how our office plans to deal with this type of request. Please let me know what our position is.

Chad Mahalich

From: Linda Fullerton

Sent: Saturday, June 26, 2021 4:10 PM

To: Chad Mahalich

<[REDACTED]>; Chris

Weir [REDACTED]; Todd

Bequette [REDACTED]

Subject: Discovery

Hello Chad:

There are various phone data records we still do not have.

1) Det. Nelly Morris issued a warrant signed on Oct. 25, 2018 that request among other things, the names and telephone numbers of stored contacts on Clark's phone, text messages, social media, emails, photographs etc. From this request, all we have received are text messages from June 30, 2018 @ 6:40:48 through July 1 @ 12:54:27. Please provide the rest of that download

2) Regarding the records that Analyst Medal has - I am assuming he is working from the records on disc 16. In Sears Statement of Probable Cause on the warrant signed Sept. 5th 2019 she comments that Medal, using new technology, was able to extract additional information from Clark's phone and that information has not been viewed by law enforcement. It is that further information that Medal extracted that we still need.

3) The results from the U.S. Secret Services lab report is not complete. We have the two pages. What we do not have is the electronic copies of the Cellebrite Report and the original and forensic copies of the image files. Those are listed under Items Provided on page two of the two page report. This information was given to Deputy Vu.

4) I understand that the Vera Institute produced a report for your office where they did a compilation and analyses of charging data from your office. I will need that for the Racial Justice Act motion that I am going to file.

Thank you, and let me know if you need any clarification on what I am requesting.

Linda