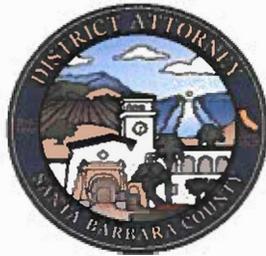


OFFICE OF THE  
**DISTRICT ATTORNEY**  
COUNTY OF SANTA BARBARA

**JOYCE E. DUDLEY**  
District Attorney



**MAG M. NICOLA**  
Chief Deputy District Attorney

**SONIA BALLESTE**  
Chief Deputy District Attorney

**MEGAN RHEINSCHILD**  
Victim Assistance Director

**KELLY A. DUNCAN**  
Chief Deputy District Attorney

**JOHN T. SAVRNOCH**  
Chief Deputy District Attorney

**PATRICK CLOUSE**  
Chief Investigator

**MICHAEL D. SODERMAN**  
Chief Financial & Administrative Officer

August 20, 2021

Ellen Leonida, Esq.  
PRA Responses  
BraunHagey & Borden LLP  
351 California Street, 10th Floor  
San Francisco, CA 94104

Dear Ms. Leonida,

The Santa Barbara District Attorney's Office is in receipt of your request dated July 23, 2021, for records under the California Public Records Act, Gov't Code §§ 6250 et seq., and Art. I, §3(b) of the California Constitution. We have attached a copy of that request as Exhibit 1 to this response. Your request references two earlier requests in addition to the requests contained in the letter dated July 23, 2021. Please see the responses to each separate request below. Responsive records are included on a flash drive with this letter.

I. May 13, 2019 Letter

In your letter you state that the ACLU sent this Office a CPRA request on May 13, 2019, seeking certain records that and that this Office did not respond to that request. Further, you state that the May 13, 2019, request is attached to your letter as Exhibit 1. Exhibit 1 to your letter is a request July 29, 2019. There were no other Exhibits attached to your letter.

This Office has no record of a request from May 13, 2019. On July 27, 2021, I sent you a request for a copy of the May 13, 2019, letter. I sent the request to leonida@braunhagey.com and praresponse@braunhagey.com. I have not received a response. As a result, we have no responsive records.

//

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**LOMPOC OFFICE**  
115 Civic Center Plaza  
Lompoc, CA 93436  
Tel: (805) 737-7760  
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## II. July 29, 2019 Letter

In your letter you state that the ACLU sent a CPRA request to this on July 29, 2019, and that we did not respond. This Office responded via email on August 8, 2019.

## III. July 23, 2019 Letter

Regarding the current requests, we provide our responses below relative to each of the categories of requested.

1. From 2015 to present, any and all written policies, memoranda, or guidance documents regarding:

a. Diversion eligibility and/or programming;

To the extent this request seeks records regarding individual cases, these records are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a). Non-exempt records are included on enclosed flash drive.

b. Custody and/or bail recommendations;

To the extent this request seeks records regarding individual cases, these records are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a). Non-exempt records are included on enclosed flash drive.

c. Charging recommendations and/or decisions, including, but not limited to:

To the extent this request seeks records regarding individual cases, these records are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a). Non-exempt records are included on enclosed flash drive.

i.. Charging recommendations and/or decisions regarding enhancements;

To the extent this request seeks records regarding individual cases, these records are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the

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request is overly burdensome, Cal. Gov't Code § 6255(a). Non-exempt records are included on enclosed flash drive.

**ii. Charging recommendations and/or decisions regarding special circumstances; or**

To the extent this request seeks records regarding individual cases, these records are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a). Non-exempt records are included on enclosed flash drive.

**iii. Charging recommendations and/or decisions regarding wobblers;**

To the extent this request seeks records regarding individual cases, these records are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a). Non-exempt records are included on enclosed flash drive.

**d. Compliance with Brady v. Maryland, 373 U.S. 83 (1963);**

To the extent this request seeks records regarding individual cases, these records are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a). Non-exempt records are included on enclosed flash drive.

**e. Jury selection;**

To the extent this request seeks records regarding individual cases, these records are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a). Non-exempt records are included on enclosed flash drive.

**f. Sentencing recommendations;**

To the extent this request seeks records regarding individual cases, these records are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a). Non-exempt records are included on enclosed flash drive.

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**g. Prosecution of minors;**

To the extent this request seeks records regarding individual cases, these records are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a), and juvenile records are exempt under Welfare & Institutions Code §827. Non-exempt records are included on enclosed flash drive.

**h. Parole recommendations;**

To the extent this request seeks records regarding individual cases, these records are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a). Non-exempt records are included on enclosed flash drive.

**i. Pardon and commutation recommendations;**

To the extent this request seeks records regarding individual cases, these records are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a). Non-exempt records are included on enclosed flash drive.

**j. Reports to the State Bar relating to discipline and/or prosecutorial misconduct;**

No responsive records.

**k. Data collection relating to criminal matters, including demographic data of defendants and victims; or**

No responsive records.

**l. Referral of cases for federal prosecution.**

No responsive records.

**2. Any and all policies regarding training as well as any training materials, recorded trainings, or related materials:**

**a. Which are mandatory for prosecutors;**

No responsive records.

**b. Which are optional for prosecutors;**

Responsive records are on enclosed flash drive.

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c. Which relate to jury selection;

Responsive records are on enclosed flash drive.

d. Which relate to bias, implicit bias, unconscious bias, and/or racism; or

Responsive records are on enclosed flash drive.

e. Which relate to presentation and/or use of evidence from social media platforms (including but not limited to YouTube, Snapchat, Instagram, TikTok, Twitter, Facebook, Reddit and Tumblr) and other media (including but not limited to movies, song lyrics, and videos).

No responsive records.

3. Records concerning the Racial Justice Act:

a. Implementation of and compliance with the RJA;

To the extent these records exist, they are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a).

b. Communications concerning the RJA; or

To the extent these records exist, they are exempt from disclosure under the Deliberative Process Exception, Cal. Gov't Code, §6255(a); the Official Information Privilege Cal. Evid. Code §1040; and the request is overly burdensome, Cal. Gov't Code § 6255(a).

c. Trainings related to the RIA.

Responsive records are on enclosed flash drive.

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4. All investigations into *Batson-Wheeler* motions, including, but not limited to:

a. Motions filed;

People v. Andre Mena, 17CR00115

People v. Manuel Espinoza, 18CR02572

b. Motions granted;

No responsive records.

c. Internal training and/or discipline; or

No responsive records.

d. Reports to the State Bar relating to any *Batson-Wheeler* motions made and granted.

No responsive records.

Sincerely,

*Casey B. Nelson*

Casey B. Nelson  
Deputy District Attorney

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# EXHIBIT 1

# BRAUNHAGEY & BORDEN LLP

San Francisco & New York

Ellen Leonida, Esq.  
Partner  
[leonida@braunhagey.com](mailto:leonida@braunhagey.com)

July 23, 2021

## SENT VIA U.S. MAIL AND EMAIL

Joyce E. Dudley  
Office of the District Attorney of Santa Barbara  
303 West Third Street, 6th Floor  
Santa Barbara, CA 92415  
(909) 382-3800  
[da@sbcda.org](mailto:da@sbcda.org)

### Re: California Public Records Act Request

To the Office of the District Attorney of Santa Barbara:

Pursuant to the California Public Records Act (“CPRA”)<sup>1</sup> and the California Constitution,<sup>2</sup> I am writing on behalf of the American Civil Liberties Union of Northern California (“ACLU”) to request records relevant to the implementation of California’s Racial Justice Act (“RJA”).<sup>3</sup> The RJA was enacted “to eliminate racial bias from California’s criminal justice system” and “to ensure that race plays no role at all in seeking or obtaining convictions or in sentencing.”<sup>4</sup> The ACLU submits this CPRA request in the public’s interest and as a member of a coalition of community groups, non-profit organizations, academic institutions, and other entities. The records that you produce will help us to implement and realize the objectives of the RJA.

On May 13, 2019, the ACLU submitted an initial CPRA request to your office seeking prosecution data for 2017 and 2018, including certain diversion records, records of your office’s engagement with the parole process, office policy records, and records concerning implementation of Senate Bill No. 1421.<sup>5</sup> (See **Exhibit 1**, attached.) Your office eventually responded to some of the requests but did not produce all responsive records. On July 29, 2019, the ACLU submitted a separate CPRA request to your office seeking training materials concerning (1) jury selection and/or (2) constitutional requirements under *Batson v. Kentucky*, 476 U.S. 79 (1986) and *People v. Wheeler*, 4 Cal. 4th 284 (1993). That request also sought training materials related to the handling of *Batson-Wheeler* claims or motions. (See **Exhibit 2**, attached.) Your office did not respond.

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<sup>1</sup> Gov’t Code §§ 6250 *et seq.*

<sup>2</sup> Cal. Const., art. I, § 3(b)(2).

<sup>3</sup> Pen. Code § 745.

<sup>4</sup> See AB-2542 *Criminal Procedure: Discrimination*, Stats. 2020, Ch. 317, § 2(i); see also Pen. Code §§ 745, 1473, 1473.7.

<sup>5</sup> See SB-1421 *Peace Officers: Release of Records*, Stats. 2020, Ch. 988; see also Pen. Code §§ 832.7, 832.8.

This CPRA letter constitutes a renewal of the ACLU's two prior requests (as relevant, updated to the present day) and also a request for the additional following records in the possession or control of the Office of the District Attorney of Santa Barbara for the time-period 2015 to present:

**Records Requested:**

1. Any and all written policies, memoranda, or guidance documents regarding:
  - a. Diversion eligibility and/or programming;
  - b. Custody and/or bail recommendations;
  - c. Charging recommendations and/or decisions, including, but not limited to:
    - i. Charging recommendations and/or decisions regarding enhancements;
    - ii. Charging recommendations and/or decisions regarding special circumstances; or
    - iii. Charging recommendations and/or decisions regarding wobblers;
  - d. Compliance with *Brady v. Maryland*, 373 U.S. 83 (1963);
  - e. Jury selection;
  - f. Sentencing recommendations;
  - g. Prosecution of minors;
  - h. Parole recommendations;
  - i. Pardon and commutation recommendations;
  - j. Reports to the State Bar relating to discipline and/or prosecutorial misconduct;
  - k. Data collection relating to criminal matters, including demographic data of defendants and victims; or
  - l. Referral of cases for federal prosecution.
  
2. Any and all policies regarding training as well as any training materials, recorded trainings, or related materials:
  - a. Which are mandatory for prosecutors;
  - b. Which are optional for prosecutors;
  - c. Which relate to jury selection;
  - d. Which relate to bias, implicit bias, unconscious bias, and/or racism; or
  - e. Which relate to presentation and/or use of evidence from social media platforms (including but not limited to YouTube, Snapchat, Instagram, TikTok, Twitter, Facebook, Reddit and Tumblr) and other media (including but not limited to movies, song lyrics, and videos).
  
3. Records concerning the Racial Justice Act:
  - a. Implementation of and compliance with the RJA;
  - b. Communications concerning the RJA; or
  - c. Trainings related to the RJA.
  
4. All investigations into *Batson-Wheeler* motions, including, but not limited to:
  - a. Motions filed;
  - b. Motions granted;

- c. Internal training and/or discipline; or
- d. Reports to the State Bar relating to any *Batson-Wheeler* motions made and granted.

In responding to this request, please note that the CPRA broadly defines the term “record.” Specifically, the term includes “any writing containing information relating to the conduct of the people’s business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics.”<sup>6</sup> The CPRA defines, in turn, a “writing” as any “means of recording upon any tangible thing any form of communication or representation.”<sup>7</sup> The present request therefore applies to *all* paper documents, as well as to *all* emails, videos, audio recordings, text messages, social media, or other electronic records within the Office of the District Attorney of Santa Barbara’s possession or control. Even if a record was created by a member of another government agency, a member of the public, or a private entity, it still must be produced so long as it is (or was) “used” or “retained” by the Office of the District Attorney of Santa Barbara.<sup>8</sup>

As permitted by the CPRA, this request sets forth the specific categories of information that we are seeking, rather than asking for documents by name.<sup>9</sup> It is your obligation to conduct record searches based on the criteria identified herein.<sup>10</sup> But if you believe the present request is overly broad, you are required to: (1) offer assistance in identifying responsive records and information; (2) describe “the information technology and physical location in which the records exist;” and (3) provide “suggestions for overcoming any practical basis” that you assert as a reason to delay or deny access to the records or information sought.<sup>11</sup>

The CPRA requires that you respond to this request in ten (10) days.<sup>12</sup> If you contend that an express provision of law exempts a responsive record from disclosure, either in whole or in part, you must make that determination in writing. Such a determination must specify the legal authority on which you rely, as well as identify both the name and title of the person(s) responsible for the determination not to disclose.<sup>13</sup> Additionally, even if you contend that a portion of a record requested is exempt from disclosure, you still must release the non-exempt portion of that record.<sup>14</sup> Please note that the CPRA “endows” your agency with “discretionary authority to override” any of the Act’s statutory exemptions “when a dominating public interest

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<sup>6</sup> Gov’t Code § 6252(e).

<sup>7</sup> *Id.* § 6252(g).

<sup>8</sup> *Id.* § 6252(e); see *California State Univ. v. Superior Ct.*, 90 Cal. App. 4th 810, 824–25 (2001) (concluding that documents which were “unquestionably ‘used’ and/or ‘retained’ by [an agency]” were public records); see also *Cty. of Santa Clara v. Superior Ct.*, 170 Cal. App. 4th 1301, 1334 (2009) (“[W]hile section 6254.9 recognizes the availability of copyright protection for software in a proper case, it provides no statutory authority for asserting any other copyright interest.”).

<sup>9</sup> Gov’t Code § 6253(b).

<sup>10</sup> See *id.* §§ 6253–6253.1.

<sup>11</sup> *Id.* § 6253.1(a).

<sup>12</sup> *Id.* § 6253(c).

<sup>13</sup> *Id.* § 6255; see also *id.* § 6253(d)(3).

<sup>14</sup> *Id.* § 6253(a), (c).

July 23, 2021

Page 4

favors disclosure.”<sup>15</sup>

Because the ACLU is a non-profit organization and because these requests pertain to matters of public concern, we request a fee waiver. None of the information obtained will be sold or distributed for profit. We also request that, to the extent possible, documents be provided in electronic format. Doing so will eliminate the need to copy the materials and provides another basis for the requested fee-waiver.

If, however, you are unwilling to waive costs and anticipate that costs will exceed \$100, and/or that the time needed to copy the records will delay their release, please contact us so that we can arrange to inspect the documents or decide which documents we wish to have copied and produced. Otherwise, please copy and send all responsive records as soon as possible and, if necessary, on a rolling basis, to: [praresponse@braunhagey.com](mailto:praresponse@braunhagey.com) or to Ellen Leonida – PRA Responses, BraunHagey & Borden LLP, 351 California Street, 10<sup>th</sup> Floor, San Francisco, CA 94104.

Thank you in advance for your assistance with this request. We look forward to receiving your response within 10 days. And once again, if you require any clarification on this request, please let us know.

Sincerely,



Ellen Leonida

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<sup>15</sup> *CBS, Inc. v. Block*, 42 Cal. 3d 646, 652 (1986); see also *Nat'l Conference of Black Mayors v. Chico Cmty. Publ'g, Inc.*, 25 Cal. App. 5th 570, 579 (2018) (construing the CPRA's exemptions as “permissive, not mandatory—they allow nondisclosure but do not prohibit disclosure”).

# EXHIBIT 1



Northern  
California

July 29, 2019

*Transmitted by email*

Santa Barbara County District Attorney's Office  
1112 Santa Barbara St  
Santa Barbara, CA 93101  
Email: DAinfo@co.santa-barbara.ca.us

Re: Request for Records Pursuant to the California Public Records Act

To Whom it May Concern:

I am writing on behalf of the American Civil Liberties Union of Northern California to request records pursuant to the California Public Records Act, California Government Code sections 6250 to 6270 and article I section 3(b) of the California Constitution.

I seek copies of the following materials in the agency's possession, regardless of who wrote them, from 1990 onwards:

1. Any training materials related to jury selection
2. Any training materials related to the constitutional requirements under *Batson v. Kentucky* and *People v. Wheeler*, including training materials related to handling *Batson-Wheeler* claims or motions.

*Batson v. Kentucky* (1986) 476 U.S. 79; *People v. Wheeler* (1978) 22 Cal.3d 258. This request construes "materials" to mean any records<sup>1</sup>, publications, memoranda, writings, electronic data, mail, media files, nonstandard documents, or other forms of communication.

In the case that this request is found to be insufficiently focused or effective, California Government Code Section 6253.1(a) requires (1) Assistance in identifying the records and information that are responsive to this request or to the purpose of this request; (2) Description of

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<sup>1</sup> The term "records" as used in this request is defined as "any writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics." Cal. Gov't Code § 6252, subsection (e). "Writing" is defined as "any handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored." Cal. Gov't Code § 6252, subsection (g).

American Civil Liberties Union Foundation of Northern California

EXECUTIVE DIRECTOR Abdi Soltani • BOARD CHAIR Magan Pritam Ray  
SAN FRANCISCO OFFICE: 39 Drumm St. San Francisco, CA 94111 • FRESNO OFFICE: PO Box 188 Fresno, CA 93707  
TEL (415) 621-2493 • FAX (415) 255-1478 • TTY (415) 863-7832 • WWW.ACLUNC.ORG

the information technology and physical location in which the records exist; and (3) that suggestions be provided for overcoming any practical basis for denying access to the records or information sought.

Pursuant to Government Code Section 6253(b), the requested records must be "promptly available," for inspection and copying, based on payment of "fees covering direct costs of duplication, or statutory fee, if applicable." No express provisions of law exist that exempt the record(s) from disclosure. As it is determined whether this request seeks copies of disclosable public records, be mindful that Article I, Section 3 (b)(2) of the California Constitution requires that a statute, court rule, or other authority be broadly construed if it furthers the right of access to the information requested and that a statute, court rule, or other authority limiting right of access be narrowly construed.

If a portion of the information requested is exempt from disclosure by express provisions of law, Government Code Section 6253(a) additionally requires segregation and deletion of that material in order that the remainder of the information may be released. If it is determined that an express provision of law exists to exempt from disclosure all or a portion of the material requested, Government Code Section 6253(c) requires notification of the reasons for the determination not later than 10 days from receipt of this request. Moreover, Government Code Section 6253(d) prohibits the use of the 10-day period, or any provisions of the Public Records Act "to delay access for purposes of inspecting public records."

Please send copies of the requested records to me at the address shown above or email them to me at [sagarwal@aclunc.org](mailto:sagarwal@aclunc.org). We request that you waive any fees that would be normally applicable to a Public Records Act request. In addition, if you have the records in electronic form you can simply email them to me without incurring any copying costs. *See Gov't. Code § 6253.9*. Should you be unable to do so, however, the ACLU will reimburse your agency for the direct costs of copying these records plus postage. *See Gov't. Code § 6253(b)*. To assist with the prompt release of responsive material, we ask that you make records available to me as you locate them, rather than waiting until all responsive records have been collected and copied.

If you have any questions regarding this request, please feel free to contact me at (415) 621-2493 or at [sagarwal@aclunc.org](mailto:sagarwal@aclunc.org). Thank you in advance for your time and attention to this request.

Sincerely,



Shilpi Agarwal  
Senior Staff Attorney