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14 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
15 CITY AND COUNTY OF SAN FRANCISCO

16 PEOPLE OF THE STATE OF  
17 CALIFORNIA,

18 Plaintiff,

19 v.

20 LEE FARLEY,

21 Defendant(s).

Case No. 16013927

**SUPPLEMENTAL DECLARATION  
OF MIKAELA RABINOWITZ IN  
SUPPORT OF OPPOSITION TO  
MOTION FOR DISCOVERY**

Date: May 4, 2021  
Time: 9:00 a.m.  
Dept.: 22

22 I, Mikaela Rabinowitz, declare:

23 1. I am an employee of the San Francisco District Attorney's Office (SFDA) and  
24 have been so employed for two months.

25 2. Currently, I am the Director of Data, Research, and Analytics. In that role, I  
26 oversee all work related to data collection, extraction, and analysis. This includes querying  
27 the SFDA case management system, DAMION, for internal performance management,  
28 public records requests, discovery requests, and more.

3. Like gang and gang-related firearm enhancements, the SFDA DAMION

1 system does not maintain a data type or data category to extract any data concerning special  
2 circumstance allegations or enhancements based on prior felony convictions. In order to  
3 extract any data related to special circumstance allegations or enhancements based on prior  
4 felony convictions, SFDA would have to create a new data type to reflect the charging of  
5 these enhancements.

6 I declare under penalty of perjury under the laws of the State of California that the  
7 foregoing is true and correct, based upon my personal knowledge, except to those items  
8 stated on information and belief and as to those items, I believe them to be true.

9 Executed at San Francisco, California on May 7, 2021.

10   
11 Mikaela Rabinowitz