

From: [Josh Wilner](#)
To: [Jacqueline Roberts](#)
Cc: [PRA Response](#)
Subject: Re: February 10, 2022 CA PRA
Date: Friday, August 26, 2022 1:14:52 PM

Thank you, Ms. Roberts. To clarify, we believe that if you redact the unique identifiers (which you indicate you will do in your March correspondence) we are then entitled to the date of birth/age and prior convictions, because the individual cannot be identified. If you plan to continue to withhold this data, we ask for your new legal justification in writing.

We look forward to receiving the report.

From: Jacqueline Roberts <jacqueline.roberts@co.del-norte.ca.us>
Sent: Friday, August 26, 2022 1:08 PM
To: Josh Wilner <Wilner@braunhagey.com>
Cc: PRA Response <praresponse@braunhagey.com>
Subject: Re: February 10, 2022 CA PRA

***** EXTERNAL MESSAGE *****

Josh,

The data that will be provided is outlined in the response letter that was sent to you on March 25, 2022. I am still waiting on the report from Karpel. As soon as I have an update I will provide it to you.

Best,

On Fri, Aug 26, 2022 at 12:51 PM Josh Wilner <Wilner@braunhagey.com> wrote:

Ms. Roberts,

Please provide an update on the Karpel report. Please also respond to the question in our May 3, 2022 email, which clarified our position that we are willing to have the Defendant's name redacted in order to remove the "summary criminal history information" distinction from the other categories of data which you informed us you plan to withhold. We ask that you confirm these other categories of data will be produced.

Thank you for your assistance with this matter.

Regards,

Joshua Wilner

BRAUNHAGEY & BORDEN LLP

San Francisco

351 California Street, 10th Floor
San Francisco, CA 94104
Tel: (415) 599-0210

New York

7 Times Square
27th Floor
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Tel: (646) 829-9403

From: Jacqueline Roberts <jacqueline.roberts@co.del-norte.ca.us>
Sent: Tuesday, July 19, 2022 11:09 AM
To: PRA Response <praresponse@braunhagey.com>
Subject: Re: February 10, 2022 CA PRA

***** EXTERNAL MESSAGE *****

Hello,

I have been informed that they are currently working on the specialized report and that it should be done soon. As soon as I have the report, I will forward it to you.

Best,

On Thu, Jul 14, 2022 at 1:12 PM Jacqueline Roberts <jacqueline.roberts@co.del-norte.ca.us> wrote:

Hello,

I am still waiting on Karpel to finish building the customized report. I will touch base with them and see where we are.

On Thu, Jul 14, 2022 at 12:50 PM PRA Response <praresponse@braunhagey.com> wrote:

Ms. Roberts,

Per the below, can you please provide an update on when we can expect to receive the data requested.

Best,

Caitlin Shaw
Litigation Legal Assistant
BRAUNHAGEY & BORDEN LLP
Direct: (415) 651-5763

From: Jacqueline Roberts <jacqueline.roberts@co.del-norte.ca.us>

Sent: Thursday, May 12, 2022 10:20 AM
To: PRA Response <praresponse@braunhagey.com>
Subject: Re: February 10, 2022 CA PRA

***** EXTERNAL MESSAGE *****

Received the check. I am working with the District Attorney to prepare the paperwork for Karpel to run a report.

On Tue, May 3, 2022 at 5:29 PM PRA Response <praresponse@braunhagey.com> wrote:

Ms. Roberts,

This message is to inform you that a check for \$1000 will be mailed to your office in the coming days. Please confirm that this payment will be for data in a spreadsheet form.

We are willing to amend our request to exclude the names of defendants. We believe this removes the exemptions for the other categories of data which you plan to withhold under Penal Code sec. 13300-13305. Please inform us of your position on this matter as soon as possible.

Please also note, we object to this fee assessment on the grounds that it is outside the bounds of what the legislature contemplated in Government Code §§ 6253 and 6253.9(b)(2) and also beyond what California courts have permitted. (See, e.g., National Lawyers Guild, San Francisco Bay Area Chapter v. City of Hayward, 9 Cal. 5th 488 (2020) [narrowly construing CPRA's data extraction provision]) Nonetheless, given the significant public interest in obtaining the requested data for implementation of the RJA, we agree to pay the assessed \$1000 under protest. We make this payment without waiver or forfeiture of any rights it may have to challenge this fee assessment in the future and without waiver of any other rights to challenge the District Attorney's/County's overall response to our RJA-related PRA requests of July 23, 2021 and February 10, 2022.

Please let me know if you have any additional questions.

Regards,

Joshua Wilner

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From: Jacqueline Roberts <jacqueline.roberts@co.del-norte.ca.us>
Sent: Friday, March 25, 2022 12:32 PM
To: Kory DeClark <declark@braunhagey.com>
Cc: PRA Response <praresponse@braunhagey.com>; Caitlin Shaw <Shaw@braunhagey.com>; Josh Wilner <Wilner@braunhagey.com>; Sarah Salomon <Salomon@braunhagey.com>
Subject: Re: February 10, 2022 CA PRA

***** EXTERNAL MESSAGE *****

Hello,

Attached is Del Norte County's third response to your California Public Records Act Request dated February 10, 2022. Del Norte County originally responded on February 17, 2022 and requested an extension of time to March 4, 2022, pursuant to Cal. Gov't Code Sec. 6253(c)(2) & (3). Del Norte County then provided that response on March 4, 2022. I then spoke to Mr. DeClark on March 11, 2022 about Del Norte's response and agreed to provide another response, with some more specifics regarding the requested data, by March 25, 2022.

Please let me know if you have any questions or concerns.

Best,

On Wed, Mar 9, 2022 at 12:24 PM Kory DeClark <declark@braunhagey.com> wrote:

Hi Jackie,

Thanks for speaking with me today. To quickly recap, we discussed your March 3 response to our February 10, 2022 PRA request. You explained that before 2018 Del Norte had no digital filing system, so everything from that period is stored only in paper files. In 2018 they switched to Karpel. Their subscription does not allow them to run individualized reports with the data we've requested. However, Karpel confirmed that they can run specialized reports with some of the data we've requested within 60 days for a flat fee of \$1000. Your view is that we would be required to pay that fee if we decided to request a specialized report.

You said that by March 25, you'd provide a letter explaining which of the categories and sub-categories of information we requested Karpel would be able to produce in a report. We can then let you know if we'd like to move forward.

Please let me know if I've left anything out. Again, I appreciate your time and look forward to receiving your letter on March 25.

Kory DeClark
BRAUNHAGEY & BORDEN LLP
Direct: (415) 869-6487

From: Jacqueline Roberts <jacqueline.roberts@co.del-norte.ca.us>

Sent: Wednesday, March 9, 2022 10:55 AM
To: PRA Response <praresponse@braunhagey.com>
Cc: Kory DeClark <declark@braunhagey.com>; Caitlin Shaw <Shaw@braunhagey.com>
Subject: Re: February 10, 2022 CA PRA

***** EXTERNAL MESSAGE *****

Hello,

I need to go to court to get a judge to review a warrant with a social worker. Can I give you a call when I get back to the office?

Thank you,

Jackie

On Fri, Mar 4, 2022 at 12:51 PM PRA Response <praresponse@braunhagey.com> wrote:

Ms. Roberts,

Wednesday at 11am will work for us. Is the number in your email signature the best one to reach you?

Regards,

From: Jacqueline Roberts <jacqueline.roberts@co.del-norte.ca.us>
Sent: Friday, March 4, 2022 11:52 AM
To: PRA Response <praresponse@braunhagey.com>
Cc: Kory DeClark <declark@braunhagey.com>; Caitlin Shaw <Shaw@braunhagey.com>
Subject: Re: February 10, 2022 CA PRA

***** EXTERNAL MESSAGE *****

Mondays are really hard for me because I am in court. Can we do Wednesday at 11am?

On Fri, Mar 4, 2022 at 11:50 AM PRA Response <praresponse@braunhagey.com> wrote:

Ms. Roberts,

Thank you for your response. We would like to schedule a phone meeting to make sure we understand your response correctly. Are you available to speak with us Monday (3/7) at 11am? If you are not available at that time, please let us know three times you are available, and we will pick one.

Regards,

Joshua Wilner

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San Francisco, CA 94104
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27th Floor
New York, NY 10036-6524
Tel: (646) 829-9403

Regards,

From: Jacqueline Roberts <jacqueline.roberts@co.del-norte.ca.us>
Sent: Thursday, March 3, 2022 4:04 PM
To: Ellen Leonida <Leonida@braunhagey.com>
Subject: February 10, 2022 CA PRA

***** EXTERNAL MESSAGE *****

Dear Ms. Ellen Leonida:

Attached is the Del Norte County District Attorney's response to your California Public Records Act Request dated February 10, 2022. The Del Norte District Attorney originally responded on February 17, 2022 and requested an extension of time to March 4, 2022, pursuant to Cal. Gov't Code Sec. 6253(c)(2) & (3).

Please let me know if you have any questions or concerns.

Best,

--

Jacqueline Stella Roberts
Deputy County Counsel
County of Del Norte

[981 H Street, Suite 220](#)
[Crescent City, CA 95531](#)
(707) 464-7208 (Phone)
(707) 465-0324 (Fax)

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