

From: [Cash, Sean](#)
To: [Freeman, Diane](#); [Josh Wilner](#)
Cc: [De La Rosa, Maricela](#); [PRA Response](#)
Subject: RE: Your County of Kings Public Records Act Request
Date: Monday, December 12, 2022 12:37:20 PM

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

Good afternoon, Josh.

I am writing in response to your November 4, 2022, email questioning whether the County fully complied with your July 2021 PRA request.

Upon receipt of your request, the County, through its District Attorney's Office, diligently searched for all responsive records and produced such records on August 24, 2021, including the slides referenced in your letter. Accordingly, the County believes it has fully complied. Nevertheless, in light of the questions you have posed, the County will conduct an additional search to determine whether there are additional responsive records.

Please know that our District Attorney's office is in a transition period, as the current DA's term expires and a new DA takes office in January. This transition, in addition to the holiday season, will likely create delays in the County's efforts to further identify, locate, and review potentially responsive records. As such, I will provide you with an update to your request no later than January 13, 2022.

Respectfully,

Sean Cash

Deputy County Counsel
County of Kings – Office of County Counsel
1400 W. Lacey Blvd., Law Building No. 4
Hanford, CA 93230
Direct: (559) 852-2445
Fax: (559) 584-0865

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From: Freeman, Diane <Diane.Freeman@co.kings.ca.us>

Sent: Monday, December 5, 2022 5:35 PM

To: Josh Wilner <Wilner@braunhagey.com>; Cash, Sean <Sean.Cash@co.kings.ca.us>

Cc: De La Rosa, Maricela <Maricela.DeLaRosa@co.kings.ca.us>; PRA Response
<praresponse@braunhagey.com>

Subject: RE: Your County of Kings Public Records Act Request

Hi Josh,

Sean Cash will provide a response to your query. If you have not already heard from him, you can expect to shortly. I have just one point to make here. Your email below fails to distinguish between my office (County Counsel) and the District Attorney. For clarification, my office (County Counsel) handles PRA requests for the DA but it does not create or dictate the DA's policies. The DA is a constitutional officer and neither I or the County has the authority to interfere with the exercise of his/her prosecutorial discretion. Accordingly, we will interpret the "your office" references below to mean the DA's office.

Sincerely,

Diane Freeman
County Counsel
County of Kings
1400 W. Lacey Blvd., Bldg #4
Hanford, CA 93230
Phone: (559)852-2445
Fax: (559)584-0865
Email: diane.freeman@co.kings.ca.us

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From: Josh Wilner <Wilner@braunhagey.com>

Sent: Monday, December 5, 2022 3:46 PM

To: Freeman, Diane <Diane.Freeman@co.kings.ca.us>; Cash, Sean <Sean.Cash@co.kings.ca.us>

Cc: De La Rosa, Maricela <Maricela.DeLaRosa@co.kings.ca.us>; PRA Response
<praresponse@braunhagey.com>

Subject: Re: Your County of Kings Public Records Act Request

Hi Diane and Sean,

Please respond to the inquiry below.

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

New York, NY 10036-6524

Tel: (646) 829-9403

From: Josh Wilner <Wilner@braunhagey.com>

Sent: Friday, November 4, 2022 3:48 PM

To: Freeman, Diane <Diane.Freeman@co.kings.ca.us>; Sean.Cash@co.kings.ca.us
<Sean.Cash@co.kings.ca.us>

Cc: De La Rosa, Maricela <Maricela.DeLaRosa@co.kings.ca.us>; PRA Response
<praresponse@braunhagey.com>

Subject: Re: Your County of Kings Public Records Act Request

Hi Diane and Sean,

I am writing to request additional information about your response to our July 23, 2021 request. Your office produced 3 PDFs, which were individual slides (as opposed to sets of slides) relating to trainings attended by your office. You produced no policies, guidance documents, memoranda, training slideshows, or email communications. You also asserted no withholdings on the basis of legal exemptions. Please be more specific about how this could constitute a complete response to our request. Does this mean that your office produces no policies, memoranda, or guidance documents of any kind? Does your office produce or attend any trainings for prosecutors? Is your office in possession of any email communications regarding the Racial Justice Act? If your office does in fact have these materials, we ask that

you produce them immediately.

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

New York, NY 10036-6524

Tel: (646) 829-9403

From: Freeman, Diane <Diane.Freeman@co.kings.ca.us>

Sent: Friday, August 6, 2021 12:47 PM

To: PRA Response <praresponse@braunhagey.com>

Cc: De La Rosa, Maricela <Maricela.DeLaRosa@co.kings.ca.us>

Subject: Your County of Kings Public Records Act Request

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

Dear Ms. Leonida,

Please find attached the County of Kings response to your Public Records Act request.

Sincerely,

Diane Walker Freeman
Deputy County Counsel
County of Kings
1400 W. Lacey Blvd., Bldg #4

Hanford, CA 93230
Phone: (559)852-2445
Fax: (559)584-0865
Email: diane.freeman@co.kings.ca.us

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