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Attorneys for Petitioners, Association of Deputy  
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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

ASSOCIATION OF DEPUTY DISTRICT  
ATTORNEYS FOR LOS ANGELES  
COUNTY,

Petitioner,

v.

COUNTY OF LOS ANGELES; COUNTY  
OF LOS ANGELES DISTRICT  
ATTORNEY'S OFFICE; GEORGE  
GASCÓN, DISTRICT ATTORNEY OF  
LOS ANGELES COUNTY; DOES 1  
THROUGH 25, inclusive,

Respondents.

Case No.

**VERIFIED PETITION FOR  
PREMPTORY WRIT OF MANDATE  
[C.C.P. § 1085]**

**AND**

**COMPLAINT FOR DECLARATORY  
RELIEF [C.C.P. § 1060]  
FOR VIOLATION OF THE  
CALIFORNIA PUBLIC  
RECORDS ACT**

Petitioner, ASSOCIATION OF DEPUTY DISTRICT ATTORNEYS FOR LOS  
ANGELES COUNTY, hereby allege as follows:

**PARTIES**

1. At all times mentioned herein, Petitioner ASSOCIATION OF DEPUTY  
DISTRICT ATTORNEYS FOR LOS ANGELES COUNTY ("ADDA") was, and is, a  
recognized employee organization as defined in the Meyers-Milias-Brown Act ("MMBA",

1 Government Code section 3500, *et seq.*). ADDA is the certified exclusive bargaining  
2 representative for Bargaining Unit 801, with regard to all matters concerning wages, hours and  
3 working conditions. Bargaining Unit 801 consists of Deputy District Attorneys I, II, III, and IV,  
4 pursuant to the Employee Relations Ordinance of the County of Los Angeles. Bargaining Unit  
5 801 includes approximately 800 deputy district attorneys in Los Angeles County (“DDAs”).  
6 ADDA has, as one of its primary purposes, the representation of government employees in their  
7 labor relations with their government employer.

8 2. Respondent COUNTY OF LOS ANGELES (“County”) is now, and at all times  
9 herein mentioned was, a duly chartered county of the State of California and a legal subdivision  
10 of the state charged with governmental powers. The County is responsible for adhering to, and  
11 complying with the provisions of the California Civil Code.

12 3. Respondent LOS ANGELES COUNTY DISTRICT ATTORNEY’S OFFICE  
13 (“DAO”) is now, and at all times herein mentioned was, the governmental agency responsible  
14 for prosecuting public offenses in Los Angeles County. In this capacity, the DAO is responsible  
15 for adhering to, and complying with the provisions of the California Civil Code. Furthermore,  
16 the DAO is a public entity as set forth in Government Code section 811.2 which may be sued  
17 pursuant to Government Code section 945.

18 4. Respondent GEORGE GASCÓN, DISTRICT ATTORNEY OF LOS ANGELES  
19 COUNTY (“GASCÓN”), is an official as defined by former Government Code section 6252(D),  
20 now Government Code section 7920.500 *et seq.*, and is, therefore, subject to the California  
21 Public Records Act (“CPRA”).

22 5. The true names and capacities, whether individual, corporate, associate or  
23 otherwise, of Does 1 through 25, inclusive, are unknown to Petitioner, who therefore sues said  
24 Respondents by such fictitious names. Petitioner will ask leave of this Court to amend this  
25 Petition to show the true names and capacities of such Respondents when the same have been  
26 ascertained.

### 27 **JURISDICTION AND VENUE**

28 6. This Court has jurisdiction over this matter pursuant to California Code of Civil

1 Procedure §§ 1085 and 1060, and former Government Code §§ 6258 and 6259, now Government  
2 Code section 7920.500 et seq.

3 7. Petitioner ADDA is, and at all times herein mentioned was, an unincorporated  
4 association duly organized and existing under the laws of the State of California, doing business  
5 as Association of Deputy District Attorneys for Los Angeles County.

6 8. Venue is proper in the Superior Court of the State of California, for the County of  
7 Los Angeles, Central District, in that the underlying acts, omissions, injuries and related facts  
8 and circumstances giving rise to the present action occurred in the County of Los Angeles,  
9 California.

#### 10 FACTS RELEVANT TO ALL CLAIMS

##### 11 March 15, 2021 CPRA Request

12 9. On or about March 15, 2021, Petitioner ADDA sent a request pursuant to the  
13 CPRA to Ruth Low, Special Assistant to **Respondent, George Gascón, District Attorney of**  
14 **Los Angeles County**, and Custodian of Records, whose duties and responsibilities were, in part,  
15 to respond to CPRA requests. On March 15, 2021, a CPRA request (see, Exhibit “A” attached  
16 hereto and incorporated by reference) was made for all communications made by and between  
17 the District Attorney’s Office and the following groups:

18 *“Californians for Safety and Justice; Justice Californians for Safety and Justice;*  
19 *Alliance for Safety and Justice; Lenore Anderson; Tinisch Hollins; Will*  
20 *Matthews; David Binder, including David Binder Research; Alex Bastian;*  
21 *Maxwell Szabo; Melina Abdullah; and all records referencing the hiring of*  
22 *Tiffany Blacknell, Alisa Blair, and Shelan Joseph, including letters, justifications*  
23 *and budget requests.”*

24 10. On March 25, 2021, **Respondent, George Gascón, District Attorney of Los**  
25 **Angeles County** delayed responding to Petitioner, invoking then-Government Code § 6253(c)  
26 for a 14 day extension. (See, Exhibit “B” attached hereto and incorporated by reference.)

27 11. Thereafter, on April 8, 2021, **Respondent, George Gascón, District Attorney of**  
28 **Los Angeles County** delayed again, extending a timely response by 10 additional days.

1           12.     Thereafter, on April 22, 2021, **Respondent, George Gascón, District Attorney**  
2 **of Los Angeles County** produced some documents in response to Petitioner ADDA's March 15,  
3 2021 CPRA request, and claimed that portions of the CPRA request were unduly burdensome  
4 and declined to produce documents in response to those portions of Petitioner ADDA's  
5 March 15, 2021 CPRA request. Specifically, **Respondent, George Gascón, District Attorney**  
6 **of Los Angeles County** claimed that Petitioner ADDA's March 15, 2021 CPRA request with  
7 regard to all communications from December 7, 2020 to March 15, 2021 "*Alex Bastian;*  
8 *Maxwell Szabo; and all records referencing the hiring of Tiffiny Blacknell, Alisa Blair, and*  
9 *Shelan Joseph, including letters, justifications and budget requests*" was unduly burdensome.  
10 (See, Exhibit "C" attached hereto and incorporated by reference.)

11           13.     Although Petitioner ADDA disagreed with **Respondent, George Gascón,**  
12 **District Attorney of Los Angeles County's** claim that the request was unduly burdensome,  
13 nonetheless, on May 7, 2021, Petitioner ADDA narrowed its requests with regard to records  
14 related to "*Alex Bastian; Maxwell Szabo*" to only those documents referring to Alex Bastian and  
15 Maxwell Szabo for a 20 day period from December 7, 2020 to December 27, 2020. Further, the  
16 May 7, 2021 correspondence to **Respondent, George Gascón, District Attorney of Los**  
17 **Angeles County** also narrowed Petitioner ADDA's request for "*. . . all records referencing the*  
18 *hiring of Tiffiny Blacknell, Alisa Blair, and Shelan Joseph, including letters, justifications and*  
19 *budget requests*" to a 12 day period from February 8, 2021 to February 19, 2021. (See, Exhibit  
20 "D" attached hereto and incorporated by reference.)

21           14.     Thereafter, in correspondence dated May 17, 2021, **Respondent, George**  
22 **Gascón, District Attorney of Los Angeles County** delayed delivery of the documents to  
23 Petitioner ADDA for an additional 14 days. (See, Exhibit "E" attached hereto and incorporated  
24 by reference.)

25           15.     In correspondence dated June 1, 2021, **Respondent, George Gascón, District**  
26 **Attorney of Los Angeles County** delayed delivery of the documents to Petitioner ADDA for an  
27 additional 30 days. (See, Exhibit "F" attached hereto and incorporated by reference.)

28           16.     After a 3-month delay, on July 1, 2021, **Respondent, George Gascón, District**



1 **Attorney of Los Angeles County** claimed that the request for 20 days of communications  
2 related to “*Alex Bastian and Maxwell Szabo*” was “*unduly burdensome,*” and “*too expansive*  
3 *and has yielded a voluminous number of records.*” **Respondent, George Gascón, District**  
4 **Attorney of Los Angeles County** further claimed the records were “*too expansive and has*  
5 *yielded a voluminous number of records. Each of the records would need to be individually*  
6 *reviewed to ensure that they were responsive and not a “false positive.” Also, a further review*  
7 *would be necessary to ensure that privileged, confidential, and otherwise exempt materials*  
8 *contained therein are redacted.*” At no time did **Respondent, George Gascón, District**  
9 **Attorney of Los Angeles County** cite any statutory reference to his claim of privilege and/or  
10 confidentiality, nor did he cite or reference any statutory scheme that would otherwise “exempt”  
11 the materials. (See, Exhibit “G” attached hereto and incorporated by reference.)

12 17. After a 3-month delay, on July 1, 2021, **Respondent, George Gascón, District**  
13 **Attorney of Los Angeles County** provided 31 pages of heavily redacted emails to Petitioner  
14 ADDA in response to “*all records referencing the hiring of Tiffiny Blacknell, Alisa Blair, and*  
15 *Shelan Joseph, including letters, justifications and budget requests*” that were inappropriately  
16 redacted. The documents provided by Respondent District Attorney Gascón are attached hereto  
17 and incorporated by reference as Exhibit “H”.

18 **July 9, 2021 CPRA Request**

19 18. On or about July 9, 2021, Petitioner ADDA requested that **Respondent, George**  
20 **Gascón, District Attorney of Los Angeles County** provide communications between the  
21 District Attorney’s Office and Christine Soto DeBerry and/or Prosecutor’s Alliance of California  
22 for the period between January 1, 2021 and June 9, 2021. In addition, records of payments, or  
23 reimbursements or any form of remuneration to Christine Soto DeBerry was also requested.  
24 (See, Exhibit “I” attached hereto and incorporated by reference.)

25 19. On or about July 23, 2021, **Respondent, George Gascón, District Attorney of**  
26 **Los Angeles County** provided ADDA with partial records of payment made to Christine Soto  
27 DeBerry. However, as to the records of communications as sought between the District  
28 Attorney’s Office and Christine Soto DeBerry and/or Prosecutor’s Alliance of California,

1 **Respondent, George Gascón, District Attorney of Los Angeles County** claimed that  
2 production of those communications was “overburdensome.”

3 20. To date, **Respondent, George Gascón, District Attorney of Los Angeles**  
4 **County** has delayed and has not provided any further response to the July 9, 2021 CPRA request  
5 by Petitioner ADDA.

6 **October 2, 2023 CPRA Request**

7 21. On or about October 2, 2023, Petitioner ADDA requested that **Respondent,**  
8 **George Gascón, District Attorney of Los Angeles County** provide a list of all cases, by case  
9 number, assigned to Shelan Joseph. (See, Exhibit “J” attached hereto and incorporated by  
10 reference.)

11 22. On or about October 4, 2023, **Respondent, George Gascón, District Attorney of**  
12 **Los Angeles County** claimed that said records were exempt from disclosure, citing former  
13 Government Code § 6254(f), further claiming “. . . *A juvenile case may not be inspected by*  
14 *persons or agencies designated in Welfare & Institutions Code §§ 827(a)(4) and 827(e). (People*  
15 *v. Superior Court (2003) 107 Cal.App.4th 483, 491-494.) They include, among others, the court,*  
16 *court personnel, the prosecutor, the minor, the minor’s parents or guardian, and assorted others*  
17 *involved in the minor’s wellbeing. Accordingly, no persons other than those specifically*  
18 *mentioned in the statute, are permitted to obtain juvenile case file records without an order from*  
19 *the juvenile court. (Ibid; Welfare & Institutions Code §§ 827 subd. (a)(1)(P) & 827(a)(4); Gov.*  
20 *Code § 6254, subd. (k)). This includes detentions and arrests where no petition was ever filed.*  
21 *(Westcott v. County of Yuba (1980) 104 Cal.App.3d 103, 106-109; & see T.N.G. v. Sup. Ct.*  
22 *(1971) 4 Cal.3d 767, 778.) Further, your request specifically cites Welfare and Institutions*  
23 *Code § 676 et seq., which is inapplicable to a request under the California Public Records Act*  
24 *and does not obviate the applicable governing statutes regarding confidentiality. ¶ Additionally,*  
25 *your request for lists, which would be generated by the LADA Prosecutors Information*  
26 *Management System, is governed by Penal Code § 1300 et seq. . . .” (See, Exhibit “K”*  
27 *attached hereto and incorporated by reference.)*

28 23. At all times herein mentioned, Petitioner is informed and believes, and based on

1 that information and belief, alleges that Shelan Joseph was not assigned for overseeing or  
2 supervising juvenile cases, nor was she assigned to handle juvenile cases at the time the  
3 October 2, 2023 CPRA request was made. Moreover, and in any event, Petitioner requested only  
4 a list of case numbers assigned to Shelan Joseph.

5 **October 12, 2023 CPRA Request**

6 24. On or about October 12, 2023, Petitioner ADDA requested that **Respondent,**  
7 **George Gascón, District Attorney of Los Angeles County** provide the ADDA with the  
8 following:

9 *“Copy of any contract or written agreement between Lawrence Middleton and*  
10 *the County or District Attorney's Office regarding his employment as Special*  
11 *Prosecutor; [c]opies of all documents prepared which allow for Lawrence*  
12 *Middleton to access criminal history information; [c]opies of all billing records*  
13 *or requests for payment made by Lawrence Middleton to the County or District*  
14 *Attorney's Office in the years 2021, 2022, and 2023 year to date; [c]opies of all*  
15 *payments made to Lawrence Middleton by the County or the District Attorney's*  
16 *Office in the years 2021, 2022, and 2023 year to date; [c]opy of any W2 or other*  
17 *tax document prepared regarding Lawrence Middleton's employment for the*  
18 *years 2021 and 2022; and [c]opies of all documents which permit Middleton to*  
19 *continue in private practice while acting as Special Prosecutor.” (See, Exhibit*  
20 *“L” attached hereto and incorporated by reference.)*

21 25. On or about October 25, 2023, **Respondent, George Gascón, District Attorney**  
22 **of Los Angeles County** requested a statutory 14 day extension to November 8, 2023 to respond  
23 to Petitioner ADDA's October 12, 2023 request. (See, Exhibit “M” attached hereto and  
24 incorporated by reference.)

25 26. From the date of the CPRA request to the present, **Respondent, George Gascón,**  
26 **District Attorney of Los Angeles County** has unreasonably delayed and has not provided any  
27 documents in response to Petitioner ADDA's October 12, 2023 request nor has **Respondent,**  
28 **George Gascón, District Attorney of Los Angeles County** requested a further extension.

1 **December 1, 2023 CPRA Request**

2 27. On or about December 1, 2023, Petitioner ADDA requested that **Respondent,**  
3 **George Gascón, District Attorney of Los Angeles County** provide a list of all names and case  
4 numbers of the 20 inmates taken off death row referenced in the press release issued by the  
5 District Attorney's Office dated April 20, 2023 entitled "*District Attorney Gascón Outlines*  
6 *Accomplishments in 2023 Midterm Report*". (See, Exhibit "N" attached hereto and incorporated  
7 by reference.)

8 From the date of the CPRA request to the present, **Respondent, George Gascón,**  
9 **District Attorney of Los Angeles County** has unreasonably delayed and has not provided any  
10 documents in response to Petitioner ADDA's December 1, 2023 request nor has **Respondent,**  
11 **George Gascón, District Attorney of Los Angeles County** requested an extension.

12 **December 4, 2023 CPRA Request**

13 29. On or about December 4, 2023, Petitioner ADDA requested that **Respondent,**  
14 **George Gascón, District Attorney of Los Angeles County** provide a list of defendants' names  
15 and case numbers for all pending capital habeas cases. (See, Exhibit "O" attached hereto and  
16 incorporated by reference.)

17 30. From the date of the CPRA request to the present, **Respondent, George Gascón,**  
18 **District Attorney of Los Angeles County** has unreasonably delayed and has not provided any  
19 documents in response to Petitioner ADDA's December 4, 2023 request nor has **Respondent,**  
20 **George Gascón, District Attorney of Los Angeles County** requested an extension.

21 **FIRST CAUSE OF ACTION**  
22 **(BY PETITIONER ADDA AGAINST ALL RESPONDENTS)**  
23 **PEREMPTORY WRIT OF MANDATE CCP § 1085**

24 31. Petitioners re-allege and incorporate herein by reference, as though set forth at  
25 length, each and every allegation contained in Paragraphs 1 through 30, inclusive, of this Petition  
26 for Peremptory Writ of Mandate.

27 32. Respondents, and each of them, had and presently have a ministerial duty to  
28 comply with the statutory mandates of former Government Code §6250, et seq., presently  
§ 7920.500, et seq.

1           33.     Petitioner, on behalf of its members is beneficially interested in the outcome of  
2 this case in that Petitioner ADDA and its individual members are the intended beneficiaries of  
3 former Government Code § 6250, now Government Code § 7920.500.

4           34.     Petitioner has no plain, speedy, or adequate remedy in the ordinary course of the  
5 law other than the relief sought by this Petition.

6                               **SECOND CAUSE OF ACTION**  
7                               **(BY PETITIONER ADDA AGAINST ALL RESPONDENTS)**

8                               **DECLARATORY RELIEF CCP § 1060**

9           35.     Petitioners re-allege and incorporate herein by reference, as though set forth at  
10 length, each and every allegation contained in Paragraphs 1 through 34, inclusive, of this Petition  
11 for Peremptory Writ of Mandate.

12           36.     An actual, present controversy exists between Petitioner ADDA and Respondents  
13 concerning their respective duties and obligations under former Government Code § 6250, now  
14 Government Code § 7920.500 in that Petitioner ADDA claims and contends that the documents  
15 sought hereinabove alleged are all within the ambit of the California Public Records Act.

16           37.     At all times herein mentioned, Respondents claim and contend that the documents  
17 set forth in §§ 9 through 28 above are not subject to the California Public Records Act or are  
18 exempt from same.

19           38.     Pursuant to California Code of Civil Procedure § 1060, the ADDA desires a  
20 judicial determination of these controversies and a declaration by the Court that Respondents  
21 must produce the records requested pursuant to the California Public Records Act .

22                       **WHEREFORE, Petitioner ADDA prays as follows:**

23           1.     That the Court issue a Peremptory Writ of Mandate upon further notice pursuant  
24 to Code of Civil Procedure § 1085 immediately directing **Respondents COUNTY OF LOS**  
25 **ANGELES DISTRICT ATTORNEY'S OFFICE; GEORGE GASCÓN, DISTRICT**  
26 **ATTORNEY OF LOS ANGELES COUNTY** and each of them, together with their officers,  
27 agents, servants, employees, representatives, and all persons acting in concert or participating  
28 with them, to disclose all records responsive to Petitioner ADDA's March 15, 2021, July 9,

2021, October 2, 2023, October 12, 2023, December 1, 2023 and December 24, 2023 CPRA requests or, in the alternative, an Order to Show Cause why these public records should not be released;

2. That the Court issue a Declaratory Judgment that the requests requested by Petitioner ADDA are disclosable public records and that **Respondent, GEORGE GASCÓN, DISTRICT ATTORNEY OF LOS ANGELES COUNTY** violated the California Public Records Act by obstructing access to these public records through his wrongful denials of the ADDA CPRA requests;

3. That the Court enter an order allowing Petitioner ADDA to recover attorneys fees in the instant action pursuant to former Government Code § 6959, and/or Code of Civil Procedure § 1021.5, and/or ;

4. For Petitioners' cost of suit incurred herein;

6. For such other and further relief as the Court may deem just, necessary and proper.

Dated: January 31, 2024

Respectfully submitted,

GREEN & SHINEE, A PC

By: \_\_\_\_\_  
Richard A. Shinee, Attorneys for Petitioner  
Association of Deputy District Attorneys for  
Los Angeles County (ADDA)

Dated: January 31, 2024

THE GIBBONS FIRM, P.C.

By: \_\_\_\_\_  
Elizabeth J. Gibbons, Attorneys for Petitioner,  
Association of Deputy District Attorneys for  
Los Angeles County (ADDA)

Exhibit “A”

Green & Shinee  
attorneys at law

Richard A. Shinee

a professional corporation  
11333 Moorpark Street, Suite 387  
Studio City, California 91602

telephone: (818) 986-2440, (818) 266-1773

Harry Benton Green  
1942-1996  
of counsel  
Goldschmid, Silver & Spindel

March 15, 2021

Ruth Low, Special Assistant  
Deputy District Attorney/Custodian of Records  
Los Angeles County District Attorney's Office  
211 W. Temple Street, Suite 1200  
[RLow@da.lacounty.gov](mailto:RLow@da.lacounty.gov)

Dear Ms. Low,

This letter is to obtain records in possession of the Los Angeles District Attorney's Office under the California Public Records Act (Government Code 6250 et seq.) and Article I, Section 3 of the California Constitution and Chapters 67.25 and the Ralph M. Brown Act (Government Code §54950).

The records I am requesting on behalf of the Association of Deputy District Attorneys are all communications between the District Attorney's office and the following groups and individuals between December 7, 2020, and March 15, 2021.

- Californians for Safety and Justice
- Justice Californians for Safety and Justice
- Alliance for Safety and Justice
- Lenore Anderson
- Tinisch Hollins
- Will Matthews
- David Binder, including David Binder Research
- Alex Bastian
- Maxwell Szabo
- Melina Abdullah
- All records referencing the hiring of Tiffiny Blacknell, Alisa Blair, and Shelan Joseph, including letters, justifications and budget requests.

The request above reasonably describes identifiable record(s) or information to be produced from that record. Throughout this request, the term "records" includes but is not limited to any paper or electronic information, reports, evaluations, memoranda, correspondence, letters, emails,



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Green & Shinee

March 15, 2021

To: Ruth Low, Special Assistant, Los Angeles County District Attorney

Re: CPRA Request for Records

charts, meeting agendas, meeting minutes, calendar invitations, and instant messages notes or other similar materials.

To make this request manageable and easy for the state to fulfill, I request that these records be provided electronically. If the records are available electronically, please email them to [secretaryadda@gmail.com](mailto:secretaryadda@gmail.com).

If you are unable to comply with this request because you believe it is not focused or effective, California Government Code Section 6253.1 (a) requires you to: (1) assist me in identifying the records and information that are responsive to my request or to the purpose of my request; (2) describe the information technology and physical location in which the records exist; and (3) provide me with suggestions for overcoming any practical basis for denying access to the records or information I am seeking.

Pursuant to Government Code Section 6253(b), I ask that you make the records "*promptly available*." I believe that no express provisions of law exist that exempt the records from disclosure. As you determine whether this request seeks copies of disclosable public records, be mindful that Article I, Section 3 (b) (2) of the California Constitution requires you to (1) broadly construe a statute or other authority if it furthers the right of access to the information I have requested; and (2) too narrowly construe a statute, court rule or other authority if it limits my right to access.

If a portion of the information I have requested is exempt from disclosure by express provisions of law, Government Code Section 6253 (a) additionally requires segregation and deletion of that material so that the remainder of the information may be released. If you determine that any express provision of law exists to exempt from disclosure all or a portion of the material I have requested, Government Code 6253 (c) requires notification to me of the reasons for the determination not later than (10) ten days from your receipt of this request.

Government Code Section 6253(d) prohibits the use of the 10-day period, or any other provisions of the Public Records Act, "*to delay access for purposes of inspecting public records*."

If it would be helpful to District Attorney's Office, I am willing to accept all of the material in an electronic format if at all possible to reduce copying and to help our environment. Because this request is a matter of public concern, we request a fee waiver. Providing the documents in an electronic format would eliminate the need to copy the materials and provides another basis for our requested fee waiver. If, however, such a waiver is denied, we will reimburse the County for the reasonable cost of copying. Please inform us in advance if the cost will be greater than \$50.

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Green & Shinee

March 15, 2021

To: Ruth Low, Special Assistant, Los Angeles County District Attorney

Re: CPRA Request for Records

Thank you in advance for your time and attention to this matter. If we can provide any clarification that will help expedite your attention to my request, please contact us at [secretaryadda@gmail.com](mailto:secretaryadda@gmail.com).

Very truly yours,

A handwritten signature in black ink, appearing to read "R A Shinee", with a stylized flourish at the end.

Richard Shinee  
General Counsel

RAS:plm  
20L-018\DLRLow210315.plm

Exhibit “B”



## LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE

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GEORGE GASCÓN • District Attorney  
• Chief Deputy District Attorney

Assistant District Attorney

### **VIA ELECTRONIC MAIL**

[secretaryadda@gmail.com](mailto:secretaryadda@gmail.com)

March 25, 2021

Dear Mr. Shinee:

### **CALIFORNIA PUBLIC RECORDS ACT REQUEST**

The Los Angeles County District Attorney's Office (LADA) is in receipt of your California Public Records Act (PRA) request dated March 15, 2021, seeking:

THE RECORDS I AM REQUESTING ON BEHALF OF THE ASSOCIATION OF DEPUTY DISTRICT ATTORNEYS ARE ALL COMMUNICATIONS BETWEEN THE DISTRICT ATTORNEY'S OFFICE AND THE FOLLOWING GROUPS AND INDIVIDUALS BETWEEN DECEMBER 7, 2020, AND MARCH 15, 2021.

- CALIFORNIANS FOR SAFETY AND JUSTICE
- JUSTICE CALIFORNIANS FOR SAFETY AND JUSTICE
- ALLIANCE FOR SAFETY AND JUSTICE
- LENORE ANDERSON
- TINISCH HOLLINS
- WILL MATTHEWS
- DAVID BINDER, INCLUDING DAVID BINDER RESEARCH
- ALEX BASTIAN
- MAXWELL SZABO
- MELINA ABDULLAH
- ALL RECORDS REFERENCING THE HIRING OF TIFFINY BLACKNELL, ALISA BLAIR, AND SHELAN JOSEPH, INCLUDING LETTERS, JUSTIFICATIONS AND BUDGET REQUESTS

Pursuant to Government Code section 6253(c), the LADA needs an additional 14 calendar days to complete its search for and review of records. The additional time is necessary to search for, collect and appropriately examine a voluminous amount of separate and distinct records.

The LADA will respond on or before \_\_\_\_\_, 20\_\_.

Very truly yours,

GEORGE GASCÓN  
District Attorney

By /s/ Dorinne Jordan

DORINNE JORDAN  
Chief Administrative Officer

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Hall of Justice  
211 West Temple Street  
Suite 1200  
Los Angeles, CA 90012  
(213) 257-2905

Exhibit “C”



## LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE

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GEORGE GASCÓN • District Attorney  
JOSEPH F. INIGUEZ • Interim Chief Deputy District Attorney

DORINNE JORDAN  
Chief Administrative Officer

**VIA ELECTRONIC MAIL**  
[secretaryadda@gmail.com](mailto:secretaryadda@gmail.com)

April 22, 2021

Richard Shinee  
Association of Deputy District Attorneys

Dear Mr. Shinee:

### CALIFORNIA PUBLIC RECORDS ACT REQUEST

This is in response to your California Public Records Act request dated March 15, 2021, directed at the Los Angeles County District Attorney's Office in which you seek the following records:

*"All communications between the District Attorney's Office and the following groups and individuals between December 7, 2020, and March 15, 2021."*

- *Californians for Safety and Justice*
- *Justice Californians for Safety and Justice*
- *Alliance for Safety and Justice*
- *Lenore Anderson*
- *Tinisch Hollins*
- *Will Matthews*
- *David Binder, Including David Binder Research*
- *Alex Bastian*
- *Maxwell Szabo*
- *Melina Abdullah*
- *All records referencing the hiring of Tiffiny Blacknell, Alisa Blair, and Shelan Joseph, including letters, justifications and budget requests."*

On March 25, 2021 and April 8, 2021, this office extended the time to provide a response so it could complete its search for and review of any responsive documents. This office submits the following response to your request:

**Californians for Safety and Justice:**

Attached are records of emails that are responsive to your request. See Attachment 1

Justice Californians for Safety and Justice:

We have performed a diligent search of our records and have found no records that are responsive to your request.

Alliance for Safety and Justice:

Attached are records of emails that are responsive to your request. See Attachment 2

Lenore Anderson:

Attached are records of emails that are responsive to your request. See Attachment 3

Tinisch Hollins:

Attached are records of emails that are responsive to your request. See Attachment 4

Will Matthews:

Attached are records of emails that are responsive to your request. See Attachment 5

David Binder, including David Binder Research:

We have performed a diligent search of our records and have found no records that are responsive to your request.

Alex Bastian:

Your request for all communications between the District Attorney's Office and Alex Bastian between December 7, 2020 and March 15, 2021 is unduly burdensome and is respectfully declined. See *American Civil Liberties Union v. Deukmejian* (1982) 32 Cal.3d 440, 452-453; *County of Los Angeles v. Superior Court (Kusar)* (1993) 18 Cal.App.4th 588, 591-592. Your request is too expansive and will result in a voluminous number of records. Each of the records would need to be individually reviewed to ensure that they were responsive and not a "false positive." Also, a further review would be necessary to ensure that privileged, confidential, and otherwise exempt materials contained therein are redacted. Therefore, your request for all communications between the District Attorney's Office and Alex Bastian between December 7, 2020 and March 15, 2021 is unduly burdensome and we are unable to produce those records. Please consider narrowing the scope of this request in such a manner as to avoid such a burdensome result.

Maxwell Szabo:

Your request for all communications between the District Attorney's Office and Maxwell Szabo between December 7, 2020 and March 15, 2021 is unduly burdensome and is respectfully declined. See *American Civil Liberties Union v. Deukmejian* (1982) 32 Cal.3d 440, 452-453; *County of Los Angeles v. Superior Court (Kusar)* (1993) 18 Cal.App.4th 588, 591-592. Your request is too expansive and will result in a voluminous number of records. Each of the records would need to be individually reviewed to ensure that they were responsive and not a "false positive." Also, a further review would be necessary to ensure that privileged, confidential, and otherwise exempt materials contained therein are redacted. Therefore, your request for all communications between the District Attorney's Office and Maxwell Szabo between December 7, 2020 and March 15, 2021 is unduly burdensome and we are unable to produce those records. Please consider narrowing the scope of this request in such a manner as to avoid such a burdensome result.

Melina Abdullah:

We have performed a diligent search of our records and have found no records that are responsive to your request.

The hiring of Tiffiny Blacknell, Alisa Blair, and Shelan Joseph, including letters, justifications and budget requests:

Your request for all records referencing the hiring of Tiffiny Blacknell, Alisa Blair, and Shelan Joseph, including letters, justifications and budget requests is unduly burdensome and is respectfully declined. See *American Civil Liberties Union v. Deukmejian* (1982) 32 Cal.3d 440, 452-453; *County of Los Angeles v. Superior Court (Kusar)* (1993) 18 Cal.App.4th 588, 591-592. Your request is too expansive and will result in a voluminous number of records. Each of the records would need to be individually reviewed to ensure that they were responsive and not a “false positive.” Also, a further review would be necessary to ensure that privileged, confidential, and otherwise exempt materials contained therein are redacted. Therefore, your request for all records referencing the hiring of Tiffiny Blacknell, Alisa Blair, and Shelan Joseph, including letters, justifications and budget requests is unduly burdensome and we are unable to produce those records. Please consider narrowing the scope of this request in such a manner as to avoid such a burdensome result.

Please do not hesitate to contact me with any questions.

Very truly yours,

GEORGE GASCÓN  
District Attorney

By *Kimberly Toney*

Kimberly Toney  
Special Assistant  
Administration



Exhibit “D”

# Green & Shinee

attorneys at law

Richard A. Shinee

a professional corporation  
11333 Moorpark Street, Suite 387  
Studio City, California 91602

telephone: (818) 986-2440, (818) 266-1773

Harry Benton Green  
1942-1996

of counsel  
Goldschmid, Silver & Spindel

May 7, 2021

***Via email and US mail***

Kimberly Toney, Special Assistant  
Los Angeles County District Attorney's Office  
211 W. Temple Street, Suite 1200  
Los Angeles, CA 90012

Dear Ms. Toney:

Thank you for your April 22, 2021 response to our request for records in possession of the Los Angeles District Attorney's Office under the California Public Records Act (Government Code 6250 et seq.) and Article I, Section 3 of the California Constitution and Chapters 67.25 and the Ralph M. Brown Act (Government Code §54950).

Gov't Code § 6253.1(a) provides that “[w]hen a member of the public requests to inspect a public record or obtain a copy of a public record, the public agency, to assist the member of the public make a focused and effective request that reasonably describes an identifiable record or records, shall do all of the following, to the extent reasonable under the circumstances.” While we believe our previous request was reasonable, in the interest of avoiding litigating this issue with your office, we have narrowed the scope of our requests to assist you in identifying the records.

Our updated request describe the documents clearly enough to permit the District Attorney's office to determine whether such documents exist. (Gov't. Code §6257.) It is important to note that the requirement of clarity is tempered by the reality that we have no access to the documents we seek and are unable to precisely identify the documents sought. (*California First Amendment Coalition v. Superior Court (Wilson)* (1998) 67 Cal.App.4th 159, 166.) As such, our request describes documents by the names of individuals, not the content of the documents. Our revised request does not require a search of an enormous volume of data and therefore is not unduly burdensome

- The first set of records I am requesting on behalf of the Association of Deputy District Attorneys are **all communications** between the District Attorney's office and Alex Bastian and Maxwell Szabo for 20 days, December 7, 2020, to December 27, 2020.

We have reason to believe that responsive emails exist. Our revised request was revised to locate responsive records that can be found with minimal effort. To ensure that our request is not

Page 2

Green & Shinee

May 7, 2021

To: Kimberly Toney, Special Assistant

Re: Request for Records

burdensome, one way the District Attorney's Office could fulfill the search obligation is to initially perform a search of the District Attorney's servers using the name criteria above for responsive emails. To make our request easier, we are NOT requesting any information posted on social media.

We would also request that the custodian of record ask the District Attorney if he has any "public records" in his personal accounts or devices. If there are responsive public records, they should be forwarded to the custodian of records for review and disclosure.

The public records we seek relate in a substantive way to the conduct of the public's business. Given that each record must be reviewed, we have limited the scope of this request.

Please note that in *City of San Jose v. Superior Court of Santa Clara County* (2017) 2 Cal.5th 608, the California Supreme Court held that writings about public business are not excluded from CPRA simply because they have been sent, received, or stored in a personal account. In supporting its ruling, the Court opined, "*there is no indication the Legislature meant to allow public officials to shield communications about official business simply by directing them through personal accounts.*" The justices also opined, "*We are aware of no California law requiring that public officials or employees use only government accounts to conduct public business. If communications sent through personal accounts were categorically excluded from the CPRA, government officials could hide their most sensitive, and potentially damning, discussions in such accounts.*" As such, it would be risky for the District Attorney's Office to assume that it is not subject to the *San José* ruling.

- We are also requesting all records referencing the hiring of Tiffany Blacknell, Alisa Blair, and Shelan Joseph for 12 days, February 8, 2021, through February 19, 2021.

If the District Attorney's Office is going to withhold documents, we request a Vaughn Index be created as courts are likely to require such an index if we were to challenge non-production. (See *Haynie v. Superior Court* (2001) 26 Cal.4th 1061, 1075.)

The request above reasonably describes identifiable record(s) or information to be produced from that record. Throughout this request, the term "records" includes but is not limited to any paper or electronic information, reports, evaluations, memoranda, correspondence, letters, emails, charts, meeting agendas, meeting minutes, calendar invitations, and instant messages notes or other similar materials.

To make this request manageable and easy for your office to fulfill, I request that these records be provided electronically. If the records are available electronically, please email them to [secretaryadda@gmail.com](mailto:secretaryadda@gmail.com).

Page 3

Green & Shinee

May 7, 2021

To: Kimberly Toney, Special Assistant

Re: Request for Records

If you are unable to comply with this request because you believe it is not focused or effective, California Government Code Section 6253.1 (a) requires you to: (1) assist me in identifying the records and information that are responsive to my request or to the purpose of my request; (2) describe the information technology and physical location in which the records exist, and (3) provide me with suggestions for overcoming any practical basis for denying access to the records or information I am seeking.

I am willing to accept all of the material in an electronic format if at all possible to reduce copying and to help our environment. Because this request is a matter of public concern, we request a fee waiver.

Thank you in advance for your time and attention to this matter. If we can provide any clarification that will help expedite your attention to my request, please contact us at [secretaryadda@gmail.com](mailto:secretaryadda@gmail.com).

Very truly yours,

GREEN & SHINEE, A P.C.

A handwritten signature in black ink that reads "RA Shinee". The letters are cursive and fluid, with the "R" and "A" being particularly large and stylized.

By: RICHARD A. SHINEE

RAS:plm

cc: Michele Hanisee, President,

Association of Deputy District Attorneys for Los Angeles County

DLKToney210507.plm

Exhibit “E”



## LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE

---

GEORGE GASCÓN • District Attorney  
JOSEPH F. INIGUEZ • Interim Chief Deputy District Attorney

DORINNE JORDAN  
Chief Administrative Officer

### VIA ELECTRONIC MAIL

[secretaryadda@gmail.com](mailto:secretaryadda@gmail.com)

May 17, 2021

Richard Shinee  
Association of Deputy District Attorneys

Dear Mr. Shinee:

### CALIFORNIA PUBLIC RECORDS ACT REQUEST

The Los Angeles County District Attorney's Office (LADA) is in receipt of your California Public Records Act (PRA) request dated May 7, 2021, seeking:

*"The first set of records I am requesting on behalf of the Association of Deputy District Attorneys are **all communications** between the District Attorney's office and Alex Bastian and Maxwell Szabo for 20 days, December 7, 2020, to December 27, 2020 ... To make our request easier, we are NOT requesting any information posted on social media.*

*We would also request that the custodian of record ask the District Attorney if he has any "public records" in his personal accounts or devices. If there are responsive public records, they should be forwarded to the custodian of records for review and disclosure."*

*"We are also requesting all records referencing the hiring of Tiffany Blacknell, Alisa Blair, and Shelan Joseph for 12 days, February 8, 2021, through February 19, 2021."*

Pursuant to Government Code section 6253(c), the LADA needs an additional 14 calendar days to complete its search for and review of records. The additional time is necessary to search for, collect and appropriately examine a voluminous amount of separate and distinct records.

The LADA will respond on or before May 31, 2021.

Very truly yours,

GEORGE GASCÓN  
District Attorney

By *Kimberly Toney*

KIMBERLY TONEY  
Special Assistant

Exhibit “F”





## LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE

---

GEORGE GASCÓN • District Attorney  
JOSEPH F. INIGUEZ • Interim Chief Deputy District Attorney

DORINNE JORDAN  
Chief Administrative Officer

### VIA ELECTRONIC MAIL

[secretaryadda@gmail.com](mailto:secretaryadda@gmail.com)

June 1, 2021

Richard Shinee  
Association of Deputy District Attorneys

Dear Mr. Shinee:

### CALIFORNIA PUBLIC RECORDS ACT REQUEST

The Los Angeles County District Attorney's Office (LADA) is in receipt of your California Public Records Act (PRA) request dated May 7, 2021, seeking:

*"The first set of records I am requesting on behalf of the Association of Deputy District Attorneys are **all communications** between the District Attorney's office and Alex Bastian and Maxwell Szabo for 20 days, December 7, 2020, to December 27, 2020 ... To make our request easier, we are NOT requesting any information posted on social media.*

*We would also request that the custodian of record ask the District Attorney if he has any "public records" in his personal accounts or devices. If there are responsive public records, they should be forwarded to the custodian of records for review and disclosure."*

*"We are also requesting all records referencing the hiring of Tiffany Blacknell, Alisa Blair, and Shelan Joseph for 12 days, February 8, 2021, through February 19, 2021."*

The LADA has identified potentially responsive documents, however additional time is needed to continue gathering and reviewing said records.

The LADA will respond on or before July 1, 2021.

Very truly yours,

GEORGE GASCÓN  
District Attorney

By *Kimberly Toney*

KIMBERLY TONEY  
Special Assistant

---

Hall of Justice  
211 West Temple Street  
Suite 1200  
Los Angeles, CA 90012  
(213) 257-2905

Exhibit “G”



## LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE

---

GEORGE GASCÓN • District Attorney  
JOSEPH F. INIGUEZ • Interim Chief Deputy District Attorney

DORINNE JORDAN  
Chief Administrative Officer

### VIA ELECTRONIC MAIL

[secretaryadda@gmail.com](mailto:secretaryadda@gmail.com)

July 1, 2021

Richard Shinee  
Association of Deputy District Attorneys

Dear Mr. Shinee:

### CALIFORNIA PUBLIC RECORDS ACT REQUEST

The Los Angeles County District Attorney's Office (LADA) is in receipt of your California Public Records Act (PRA) request dated May 7, 2021, seeking:

*"The first set of records I am requesting on behalf of the Association of Deputy District Attorneys are **all communications** between the District Attorney's office and Alex Bastian and Maxwell Szabo for 20 days, December 7, 2020, to December 27, 2020. We have reason to believe that responsive emails exist. Our revised request was revised to locate responsive records that can be found with minimal effort. To ensure that our request is not burdensome, one way the District Attorney's Office could fulfill the search obligation is to initially perform a search of the District Attorney's servers using the name criteria above for responsive emails. To make our request easier, we are NOT requesting any information posted on social media.*

*We would also request that the custodian of record ask the District Attorney if he has any "public records" in his personal accounts or devices. If there are responsive public records, they should be forwarded to the custodian of records for review and disclosure.*

*"We are also requesting all records referencing the hiring of Tiffany Blacknell, Alisa Blair, and Shelan Joseph for 12 days, February 8, 2021, through February 19, 2021."*

All communications between the District Attorney's office and Alex Bastian and Maxwell Szabo for 20 days, December 7, 2020, to December 27, 2020.

The LADA acknowledges that your request for all communications between the District Attorney's Office and Alex Bastian and Maxwell Szabo for 20 days, December 7, 2020 to December 27, 2020 was narrowed, however, it remains unduly burdensome and is respectfully declined. See *American Civil Liberties Union v. Deukmejian* (1982) 32 Cal.3d 440, 452-453; *County of Los Angeles v. Superior Court (Kusar)* (1993) 18 Cal.App.4th 588, 591-592. Your request is too expansive and has yielded a voluminous number of records. Each of the records would need to be individually reviewed to ensure that they were responsive and not a "false positive." Also, a further review would be necessary to ensure that privileged, confidential, and otherwise exempt materials contained therein are redacted. Therefore, your request for all communications between the District Attorney's Office and Alex Bastian and Maxwell Szabo for 20 days, December 7, 2020 to December 27, 2020 is unduly burdensome and we are unable to produce those records. Please consider narrowing the scope of this request in such a manner as to avoid such a burdensome result.

All records referencing the hiring of Tiffany Blacknell, Alisa Blair, and Shelan Joseph for 12 days, February 8, 2021, through February 19, 2021.

Your request for all records referencing the hiring of Tiffany Blacknell, Alisa Blair, and Shelan Joseph for 12 days, February 8, 2021, through February 19, 2021 seeks employee personnel records. Please note that potentially responsive records containing private information of individuals is protected by the constitutional right of privacy, including statutory and common law privileges. (California Constitution, Article I, § 1 and Government Code § 6254, subd. (k).)

Additionally, records containing personnel, medical, and/or private information are exempt or prohibited from disclosure by State or Federal law. (Government Code § 6254(c) and (k).)

Notwithstanding the above, the following records are responsive to your request. See Attachment 1

Very truly yours,

GEORGE GASCÓN  
District Attorney

By 

KIMBERLY TONEY  
Special Assistant  
Administration

Exhibit “H”

Kimberly Toney

---

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

---

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** Bernie Dillon <[BDillon@pubdef.lacounty.gov](mailto:BDillon@pubdef.lacounty.gov)>

**Sent:** Tuesday, February 9, 2021 5:55 PM

**To:** Stanley Yen <[SYen@da.lacounty.gov](mailto:SYen@da.lacounty.gov)>

**Cc:** Nancy Salas <[NSalas@pubdef.lacounty.gov](mailto:NSalas@pubdef.lacounty.gov)>

**Subject:** RE: Release Date - Tiffany Blacknell

Good afternoon Stanley,

Monday, March 1, 2021 works for our department.

Best,

**Bernie Dillon**

Departmental HR Manager  
Law Offices of the Public Defender  
Los Angeles County  
210 West Temple Street, Suite 19-805  
Los Angeles, CA 90012  
Office: (213) 974-2866  
Cell: (323) 351-9399  
[bdillon@pubdef.lacounty.gov](mailto:bdillon@pubdef.lacounty.gov)



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---

**From:** Stanley Yen <[SYen@da.lacounty.gov](mailto:SYen@da.lacounty.gov)>  
**Sent:** Tuesday, February 9, 2021 3:25 PM  
**To:** Bernie Dillon <[BDillon@pubdef.lacounty.gov](mailto:BDillon@pubdef.lacounty.gov)>  
**Subject:** Release Date - Tiffiny Blacknell

Hi Bernie,

We received approval to proceed with the administrative reassignment for Tiffiny Blacknell to be released on Monday, March 1, 2021.

Can the request be accommodated?

Thank you.

**Stanley Yen**  
Personnel Officer  
Human Resources Division  
☎ (213) 257-2701  
✉ [syen@da.lacounty.gov](mailto:syen@da.lacounty.gov)



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**Kimberly Toney**

---

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

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**Sent:** Tuesday, February 9, 2021 5:55 PM

**To:** Stanley Yen <[SYen@da.lacounty.gov](mailto:SYen@da.lacounty.gov)>

**Cc:** Nancy Salas <[NSalas@pubdef.lacounty.gov](mailto:NSalas@pubdef.lacounty.gov)>

**Subject:** RE: Release Date - Tiffiny Blacknell

Good afternoon Stanley,

Monday, March 1, 2021 works for our department.

Best,

**Bernie Dillon**

Departmental HR Manager

Law Offices of the Public Defender

Los Angeles County

210 West Temple Street, Suite 19-805

Los Angeles, CA 90012



Office: (213) 974-2866  
Cell: (323) 351-9399  
[bdillon@pubdef.lacounty.gov](mailto:bdillon@pubdef.lacounty.gov)



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Can the request be accommodated?

Thank you.

**Stanley Yen**  
Personnel Officer  
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**Kimberly Toney**

---

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** Bernie Dillon <BDillon@pubdef.lacounty.gov>

**Sent:** Tuesday, February 9, 2021 5:55 PM

**To:** Stanley Yen <SYen@da.lacounty.gov>

**Cc:** Nancy Salas <NSalas@pubdef.lacounty.gov>

**Subject:** RE: Release Date - Tiffiny Blacknell

Good afternoon Stanley,

Monday, March 1, 2021 works for our department.

Best,

**Bernie Dillon**

Departmental HR Manager

Law Offices of the Public Defender

Los Angeles County

210 West Temple Street, Suite 19-805

Los Angeles, CA 90012

Office: (213) 974-2866

Cell: (323) 351-9399

[bdillon@pubdef.lacounty.gov](mailto:bdillon@pubdef.lacounty.gov)



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**Subject:** Release Date - Tiffany Blacknell

Hi Bernie,

We received approval to proceed with the administrative reassignment for Tiffany Blacknell to be released on Monday, March 1, 2021.

Can the request be accommodated?

Thank you.

**Stanley Yen**  
Personnel Officer  
Human Resources Division  
☎ (213) 257-2701  
✉ [syen@da.lacounty.gov](mailto:syen@da.lacounty.gov)



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## Kimberly Toney

---

**From:** Stanley Yen  
**Sent:** Thursday, February 11, 2021 3:23 PM  
**To:** Bernie Dillon  
**Cc:** Nancy Salas;Edwin Calderon  
**Subject:** RE: Release Date - Tiffany Blacknell

Hi Bernie,

Confirmed. My team will process Ms. Blacknell's administrative reassignment to DDA IV effective March 1, 2021.

**Stanley Yen**

☎ (213) 257-2701

✉ [syen@da.lacounty.gov](mailto:syen@da.lacounty.gov)

---

**From:** Bernie Dillon <BDillon@pubdef.lacounty.gov>  
**Sent:** Thursday, February 11, 2021 12:38 PM  
**To:** Stanley Yen <SYen@da.lacounty.gov>  
**Cc:** Nancy Salas <NSalas@pubdef.lacounty.gov>  
**Subject:** RE: Release Date - Tiffany Blacknell

Good afternoon Stanley,

Please confirm that Ms. Tiffany Blacknell will laterally transfer to the DA's Office effective March 1, 2021 and that your team will process her admin reassignment to the DDA IV position.

Thank you.

**Bernie Dillon**

Departmental HR Manager  
Law Offices of the Public Defender  
Los Angeles County  
210 West Temple Street, Suite 19-805  
Los Angeles, CA 90012  
Office: (213) 974-2866  
Cell: (323) 351-9399  
[bdillon@pubdef.lacounty.gov](mailto:bdillon@pubdef.lacounty.gov)



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Good afternoon Stanley,

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Best,

**Bernie Dillon**

Departmental HR Manager  
Law Offices of the Public Defender  
Los Angeles County  
210 West Temple Street, Suite 19-805  
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Can the request be accommodated?

Thank you.

**Stanley Yen**

Personnel Officer

Human Resources Division



(213) 257-2701



[syen@da.lacounty.gov](mailto:syen@da.lacounty.gov)



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**Kimberly Toney**

---

[REDACTED]

[REDACTED]

[REDACTED]

---

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

---

**From:** Bernie Dillon <[BDillon@pubdef.lacounty.gov](mailto:BDillon@pubdef.lacounty.gov)>

**Sent:** Tuesday, February 9, 2021 5:55 PM

**To:** Stanley Yen <[SYen@da.lacounty.gov](mailto:SYen@da.lacounty.gov)>

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**Subject:** RE: Release Date - Tiffiny Blacknell

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**Bernie Dillon**

Departmental HR Manager

Law Offices of the Public Defender

Los Angeles County

210 West Temple Street, Suite 19-805

Los Angeles, CA 90012

Office: (213) 974-2866

Cell: (323) 351-9399

[bdillon@pubdef.lacounty.gov](mailto:bdillon@pubdef.lacounty.gov)



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**From:** Stanley Yen <[SYen@da.lacounty.gov](mailto:SYen@da.lacounty.gov)>  
**Sent:** Tuesday, February 9, 2021 3:25 PM  
**To:** Bernie Dillon <[BDillon@pubdef.lacounty.gov](mailto:BDillon@pubdef.lacounty.gov)>  
**Subject:** Release Date - Tiffiny Blacknell

Hi Bernie,

We received approval to proceed with the administrative reassignment for Tiffiny Blacknell to be released on Monday, March 1, 2021.

Can the request be accommodated?

Thank you.

**Stanley Yen**  
Personnel Officer  
Human Resources Division  
☎ (213) 257-2701  
✉ [syen@da.lacounty.gov](mailto:syen@da.lacounty.gov)



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**Kimberly Toney**

---

**From:** Stanley Yen <SYen@da.lacounty.gov>  
**Sent:** Thursday, February 11, 2021 3:23 PM  
**To:** Bernie Dillon <BDillon@pubdef.lacounty.gov>  
**Cc:** Nancy Salas <NSalas@pubdef.lacounty.gov>; Edwin Calderon <ECaldero@da.lacounty.gov>  
**Subject:** RE: Release Date - Tiffany Blacknell

Hi Bernie,

Confirmed. My team will process Ms. Blacknell's administrative reassignment to DDA IV effective March 1, 2021.

**Stanley Yen**  
 (213) 257-2701  
 [syen@da.lacounty.gov](mailto:syen@da.lacounty.gov)

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Good afternoon Stanley,

Please confirm that Ms. Tiffany Blacknell will laterally transfer to the DA's Office effective March 1, 2021 and that your team will process her admin reassignment to the DDA IV position.

Thank you.

**Bernie Dillon**  
Departmental HR Manager  
Law Offices of the Public Defender  
Los Angeles County  
210 West Temple Street, Suite 19-805  
Los Angeles, CA 90012  
Office: (213) 974-2866  
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**Kimberly Toney**

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Thank you.

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Departmental HR Manager

Law Offices of the Public Defender

Los Angeles County

210 West Temple Street, Suite 19-805

Los Angeles, CA 90012

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## Kimberly Toney

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## Kimberly Toney

---

**From:** Rodney Collins <rcollins@hr.lacounty.gov>  
**Sent:** Friday, February 19, 2021 11:49 AM  
**To:** Stanley Yen  
**Subject:** RE: Administrative Reassignments

Stanley,

We should be fine for March 1, 2021. I do need some assistance, do you have access to a notary? If I could get Ms. Blacknell to sign a new release and have it notarized things would speed up significantly. If not, I'll have to have her meet me at a local notary to resign the release document.

If we cannot have it finalized by 3/1/21 we will provide the Department with any preliminary information and will need to do the contingent letter.

Rodney

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**From:** Stanley Yen <SYen@da.lacounty.gov>  
**Sent:** Thursday, February 18, 2021 9:53 PM  
**To:** Rodney Collins <rcollins@hr.lacounty.gov>  
**Subject:** FW: Administrative Reassignments

Hi Rodney,

Can you please provide an update on the background investigation for Ms. Blacknell if it will be completed by her anticipated start date of March 1, 2021, and if there are any onboarding concerns?

Please also confirm Ms. Garrett has approved the administrative reassignment of Ms. Blacknell from the position of Deputy Public Defender IV from the Public Defender's Office to Deputy District Attorney IV in the District Attorney's Office.

Thank you.

**Stanley Yen**  
☎ (213) 257-2701  
✉ [syen@da.lacounty.gov](mailto:syen@da.lacounty.gov)

[REDACTED]

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## Kimberly Toney

---



**From:** Stanley Yen  
**Sent:** Friday, February 19, 2021 3:59 PM  
**To:** Rodney Collins  
**Subject:** RE: Administrative Reassignments

Hi Rodney,

I am not aware of access to notary. We will have Ms. Blacknell complete the Contingent Offer Form just in case the background is not completed by March 1, 2021.

Please also confirm if Ms. Garrett has approved the administrative reassignment of Ms. Blacknell from the position of Deputy Public Defender IV from the Public Defender's Office to Deputy District Attorney IV in the District Attorney's Office.

Thank you.

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[REDACTED]

Exhibit “I”

# Association of Deputy District Attorneys



515 S. Flower St. • 18th Floor  
Los Angeles, CA 90071  
(213) 236-3618

---

Via Email

July 9, 2021

Kimberly Toney, Special Assistant  
Los Angeles County District Attorney's Office  
211 W. Temple Street, 12<sup>th</sup> Floor  
Los Angeles, CA. 90012  
ktoney@da.lacounty.gov

Dear Ms. Toney:

This letter is to obtain records in possession of the Los Angeles District Attorney's Office under the California Public Records Act (Government Code 6250 et seq.) and Article I, Section 3 of the California Constitution and Chapters 67.25 and the Ralph M. Brown Act (Government Code Section 54950).

The records I am requesting on behalf of the Association of Deputy District Attorneys are:

- Any and all communication between the District Attorney's Office and Cristine Soto Deberry between January 1, 2021, and June 9, 2021.
- Documents reflecting payment, reimbursement, or remuneration to Cristine Soto Deberry.
- Any and all communications between the District Attorney's Office and the Prosecutors Alliance California.

The request above reasonably describes identifiable record(s) or information to be produced from that record. Throughout this request, the term "records" includes but is not limited to any paper or electronic information, reports, evaluations, memoranda, correspondence, letters, emails, charts, meeting agendas, meeting minutes, calendar invitations, and instant messages notes or other similar materials.

To make this request manageable and easy for the state to fulfill, I request that these records be provided electronically. If the records are available electronically, please email them to [secretaryadda@gmail.com](mailto:secretaryadda@gmail.com).

If you are unable to comply with this request because you believe it is not focused or effective, California Government Code Section 6253.1(a) requires you to: (1) assist me in identifying the records and information that are responsive to my request or to the purpose of my request; (2) describe the information technology and physical location in which the records exist; and (3) provide me with suggestion for overcoming any practical basis for denying access to the records or information I am seeking.

Pursuant to Government Code Section 6253 (b), I ask that you make the records “*promptly available.*” I believe that no express provisions of law exist that exempt the records from disclosure. As you determine whether this request seeks copies of disclosable public records, be mindful that Article I, Section 3 (b) (2) of the California Constitution requires you to (1) broadly construe a statute or other authority if it furthers the right of access to the information I have requested; and (2) too narrowly construe a statute, court rule or other authority if it limits my right to access.

If a portion of the information I have requested is exempt from disclosure by express provisions of law, Government Code Section 6253 (a) additionally requires segregation and deletion of that material so that the remainder of the information may be released. If you determine that any express provision of law exists to exempt from disclosure all or a portion of the material I have requested, Government Code Section 6235 (c) requires notification to me of the reasons for the determination not later than (10) ten day from our receipt of this request.

Government Code Section 6253 (d) prohibits the use of the 10-day period, or any other provisions of the Public Records Act, “*to delay access for purposes of inspection public records.*”

If it would be helpful to the District Attorney’s Office, I am willing to accept all of the material in an electronic format if at all possible to reduce copying and to help our environment. Because this request is a matter of public concern, we request a fee waiver. Providing the documents in an electronic format would eliminate the need to copy the materials and provides another basis for our request fee waiver. If, however, such a waiver is denied, we will reimburse the County for the reasonable cost of copying. Please inform us in advance if the cost will be greater than \$50.

Thank you in advance for your time and attention to this matter. If we can provide any clarification that will help expedite your attention to my request, please contact us at [secretaryadda@gmail.com](mailto:secretaryadda@gmail.com).

Very truly yours,

A handwritten signature in cursive script, appearing to read "R A Shinee".

Richard Shinee  
General Counsel

Exhibit “J”



Green & Shinee  
attorneys at law

Richard A. Shinee

a professional corporation  
11333 Moorpark Street, Suite 387  
Studio City, California 91602

telephone: (818) 986-2440, (818) 266-1773

Harry Benton Green  
1942-1996

of counsel  
Goldschmid, Silver & Spindel

October 2, 2023

***Via Email & US mail***  
KToney@da.lacounty.gov

Kimberly Toney, Special Assistant  
Custodian of Records  
Los Angeles County District Attorney's Office  
211 W. Temple Street, Suite 1200  
Los Angeles, CA 90012

Re: California Public Records Act Request for Records

Dear Ms. Toney:

This letter is a request to obtain records in possession of the Los Angeles District Attorney's Office pursuant to the California Public Records Act (*Government Code* § 6250 et seq.), Article I, Section 3 of the *California Constitution*, Chapters 67.25, and the Ralph M. Brown Act (*Government Code* §54950).

The records I am requesting are: **a listing of all Superior Court cases, by Superior Court case number, that have been assigned to Shelan Joseph.**

The request above reasonably describes identifiable record(s) or information to be produced from that record. Throughout this request, the term "records" includes but is not limited to any paper or electronic communication, memoranda, correspondence, letters, emails, and instant messages or other similar materials.

To make this request more manageable and easy for the District Attorney to fulfill, I request that these records be provided electronically. If the records are available electronically, please email them to GSRAS2017@gmail.com.

If you are unable to comply with this request because you believe it is not focused or effective, *California Government Code* § 6253.1 (a) requires you to: (1) assist me in identifying the records and information that are responsive to my request or to the purpose of my request; (2) describe the information technology and physical location in which the records exist; and (3) provide me with suggestions for overcoming any practical

Page 2

Green & Shinee

October 2, 2023

To: Kimberly Toney, Special Assistant  
Deputy District Attorney/Custodian of Records

Re: CPRA Request

basis for denying access to the records or information I am seeking.

Pursuant to *Government Code* § 6253(b), I ask that you make the records “promptly available” I believe that no express provisions of law exist that exempt the records from disclosure. As you determine whether this request seeks copies of disclosable public records, be mindful that Article I, Section 3 (b) (2) of the California Constitution requires you to (1) broadly construe a statute or other authority if it furthers the right of access to the information I have requested; and (2) too narrowly construe a statute, court rule or other authority if it limits my right to access.

If a portion of the information I have requested is exempt from disclosure by express provisions of law, *Government Code* § 6253 (a) additionally requires segregation and deletion of that material so that the remainder of the information may be released. If you determine that any express provision of law exists to exempt from disclosure all or a portion of the material I have requested, *Government Code* § 6253 (c) requires notification to me of the reasons for the determination not later than (10) ten days from your receipt of this request.

*Government Code* § 6253(d) prohibits the use of the 10-day period, or any other provisions of the Public Records Act, “to delay access for purposes of inspecting public records.” If it would be helpful to the District Attorney’s Office, I am willing to accept all of the material in an electronic format if at all possible to reduce copying and to help our environment. Because this request is a matter of public concern, we request a fee waiver. Providing the documents in an electronic format would eliminate the need to copy the materials and provides another basis for our requested fee waiver. If, however, such a waiver is denied, we will reimburse the County for the reasonable cost of copying. Please inform us in advance if the cost will be greater than \$50.

Thank you in advance for your time and attention to this matter. If we can provide any clarification that will help expedite your attention to my request, please contact me at GSRAS2017@gmail.com.

Very truly yours,

GREEN & SHINEE, A PC

*RA Shinee*

RICHARD A. SHINEE

Exhibit “K”



LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE  
BUREAU OF PROSECUTION SUPPORT OPERATIONS

GEORGE GASCÓN • District Attorney  
JOSEPH F. INIGUEZ • Chief of Staff

DIANA M. TERAN • Director

**VIA ELECTRONIC MAIL**

Gstras2017@gmail.com

Richard Shinee  
Green & Shinee

October 4, 2023

Dear Mr. Shinee,

California Public Records Act Request  
Response

The Los Angeles County District Attorney's Office (LADA) is in receipt of your California Public Records Act (PRA) request, sent 10/2/23, seeking:

*- a listing of all Superior Court cases, by Superior Court case number, that have been assigned to Shelan Joseph.*

The records and information you request are exempt from disclosure under the Public Records Act and will not be released. The following records are exempt from disclosure:

Records the disclosure of which is exempted or prohibited pursuant to federal or state law, including, but not limited to, provisions of the Evidence Code relating to privilege." (Government Code § 6254(k).)

A juvenile case file may only be inspected by persons or agencies designated in Welfare & Institutions Code §§ 827(a)(4) and 827(e). (*People v. Superior Court* (2003) 107

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Hall of Justice  
211 West Temple Street  
Suite 1200  
Los Angeles, CA 90012  
(213) 257-3000

Cal.App.4th 483, 491-494.) They include, among others, the court, court personnel, the prosecutor, the minor, the minor's parents or guardian, and assorted others involved in the minor's wellbeing. Accordingly, no persons other than those specifically mentioned in the statute, are permitted to obtain juvenile case file records without an order from the juvenile court. (*Ibid*; Welfare & Institutions Code §§ 827 subd. (a)(1)(P) & 827(a)(4); Gov. Code § 6254, subd. (k)) This includes detentions and arrests where no petition was ever filed. (*Westcott v. County of Yuba* (1980) 104 Cal.App.3d 103, 106-109; & see *T.N.G. v. Sup. Ct.* (1971) 4 Cal.3d 767, 778.) Further, your request specifically cites Welfare and Institutions Code § 676 et seq., which is inapplicable to a request under the California Public Records Act and does not obviate the applicable governing statutes regarding confidentiality.

Additionally, your request for lists, which would be generated by the LADA Prosecutors Information Management System, is governed by Penal Code § 13300 et seq., the local summary criminal history statute. A prosecutor's office cannot release, in response to a PRA request, "the identification and criminal history of any person, such as name, date of birth, physical description, dates of arrests, arresting agencies and booking numbers, charges, dispositions, and similar data about the person." (Penal Code, § 13300, subd. (a)(1).) It is a misdemeanor for any employee to release such information to unauthorized persons. (Pen. Code, § 13302.) Merely removing a defendant's name and furnishing only a case number is also a violation of the statute. (89 Ops.Cal.Atty.Gen. 204, 215 (2006).) Penal Code § 13300 et seq. applies to juveniles and adults alike.

Based on the above, we are unable to comply with your request.

Very truly yours,

GEORGE GASCÓN  
District Attorney

By: *Kathryn Albracht*

Kathryn Albracht  
Special Assistant  
Bureau of Prosecution Support Operations  
kalbrach@da.lacounty.gov

Exhibit “L”

Green & Shinee  
attorneys at law

Richard A. Shinee

a professional corporation  
11333 Moorpark Street, Suite 387  
Studio City, California 91602

telephone: (818) 986-2440, (818) 266-1773

Harry Benton Green  
1942-1996

of counsel  
Goldschmid, Silver & Spindel

October 12, 2023

***Via Email & US mail***  
KToney@da.lacounty.gov

Denise Fox, Litigation Coordinator  
Los Angeles County District Attorney's Office  
211 W. Temple Street, Suite 1200  
Los Angeles, CA 90012

Re: California Public Records Act Request for Records

Dear Ms. Fox:

This letter is a request to obtain records in possession of the Los Angeles District Attorney's Office pursuant to the California Public Records Act (*Government Code* § 6250 et seq.), Article I, Section 3 of the *California Constitution*, Chapters 67.25, and the Ralph M. Brown Act (*Government Code* §54950).

The records I am requesting are:

1. Copy of any contract or written agreement between Lawrence Middleton and the County or District Attorney's Office regarding his employment as Special Prosecutor.
2. Copies of all documents prepared which allow for Lawrence Middleton to access criminal history information.
3. Copies of all billing records or requests for payment made by Lawrence Middleton to the County or District Attorney's Office in the years 2021, 2022, and 2023 year to date.
4. Copies of all payments made to Lawrence Middleton by the County or the District Attorney's Office in the years 2021, 2022, and 2023 year to date.

Page 2

Green & Shinee

October 12, 2023

To: Denise Fox, Litigation Coordinator  
Deputy District Attorney/Custodian of Records

Re: CPRA Request

5. Copy of any W2 or other tax document prepared regarding Lawrence Middleton's employment for the years 2021 and 2022.

6. Copies of all documents which permit Middleton to continue in private practice while acting as Special Prosecutor.

The request above reasonably describes identifiable record(s) or information to be produced from that record. Throughout this request, the term "records" includes but is not limited to any paper or electronic communication, memoranda, correspondence, letters, emails, and instant messages or other similar materials.

To make this request more manageable and easy for the District Attorney to fulfill, I request that these records be provided electronically. If the records are available electronically, please email them to GSRAS2017@gmail.com.

If you are unable to comply with this request because you believe it is not focused or effective, *California Government Code* § 6253.1 (a) requires you to: (1) assist me in identifying the records and information that are responsive to my request or to the purpose of my request; (2) describe the information technology and physical location in which the records exist; and (3) provide me with suggestions for overcoming any practical basis for denying access to the records or information I am seeking.

Pursuant to *Government Code* § 6253(b), I ask that you make the records "promptly available" I believe that no express provisions of law exist that exempt the records from disclosure. As you determine whether this request seeks copies of disclosable public records, be mindful that Article I, Section 3 (b) (2) of the California Constitution requires you to (1) broadly construe a statute or other authority if it furthers the right of access to the information I have requested; and (2) too narrowly construe a statute, court rule or other authority if it limits my right to access.

If a portion of the information I have requested is exempt from disclosure by express provisions of law, *Government Code* § 6253 (a) additionally requires segregation and deletion of that material so that the remainder of the information may be released. If you determine that any express provision of law exists to exempt from disclosure all or a portion of the material I have requested, *Government Code* § 6253 (c) requires notification to me of the reasons for the determination not later than (10) ten days from your receipt of this request.



Page 3

Green & Shinee

October 12, 2023

To: Denise Fox, Litigation Coordinator  
Deputy District Attorney/Custodian of Records

Re: CPRA Request

*Government Code* § 6253(d) prohibits the use of the 10-day period, or any other provisions of the Public Records Act, “*to delay access for purposes of inspecting public records.*” If it would be helpful to the District Attorney’s Office, I am willing to accept all of the material in an electronic format if at all possible to reduce copying and to help our environment. Because this request is a matter of public concern, we request a fee waiver. Providing the documents in an electronic format would eliminate the need to copy the materials and provides another basis for our requested fee waiver. If, however, such a waiver is denied, we will reimburse the County for the reasonable cost of copying. Please inform us in advance if the cost will be greater than \$50.

Thank you in advance for your time and attention to this matter. If we can provide any clarification that will help expedite your attention to my request, please contact me at GSRAS2017@gmail.com.

Very truly yours,

GREEN & SHINEE, A PC

*RA Shinee*

RICHARD A. SHINEE

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County  
21L-039\DLDFox231012.plm

Exhibit “M”



LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE  
BUREAU OF PROSECUTION SUPPORT OPERATIONS

GEORGE GASCÓN • District Attorney  
JOSEPH F. INIGUEZ • Chief of Staff

DIANA M. TERAN • Director

VIA ELECTRONIC MAIL  
GSRAS2017@gmail.com

October 25, 2023

Richard Shinee  
Green & Shinee

Dear Mr. Shinee,

CALIFORNIA PUBLIC RECORDS ACT REQUEST

We have received your Public Records Act request, concerning Lawrence Middleton.

Pursuant to Government Code section 7922.535, subdivision (b) we require an additional 14 calendar days to complete our search for and review of records. The additional time is necessary to gather the information you request.

We will respond on or before November 8, 2023.

Very truly yours,

GEORGE GASCÓN  
District Attorney

By: *Kathryn Albracht*

Kathryn Albracht  
Special Assistant  
Bureau of Prosecution Support Operations  
kalbrach@da.lacounty.gov

---

Hall of Justice  
211 West Temple Street  
Suite 1200  
Los Angeles, CA 90012  
(213) 257-3000

Exhibit “N”

Green & Shinee  
attorneys at law

Richard A. Shinee

a professional corporation  
11333 Moorpark Street, Suite 387  
Studio City, California 91602

telephone: (818) 986-2440, (818) 266-1773

Harry Benton Green  
1942-1996

of counsel  
Goldschmid, Silver & Spindel

December 1, 2023

***Via Email & US mail***  
KAlbracht@da.lacounty.gov

Kathryn Albracht, Litigation Coordinator  
Los Angeles County District Attorney's Office  
211 W. Temple Street, Suite 1200  
Los Angeles, CA 90012

Re: California Public Records Act Request for Records

Dear Ms. Albracht:

This letter is a request to obtain records in possession of the Los Angeles District Attorney's Office pursuant to the California Public Records Act (*Government Code* § 6250 et seq.), Article I, Section 3 of the *California Constitution*, Chapters 67.25, and the Ralph M. Brown Act (*Government Code* §54950).

The records I am requesting are the names and case numbers of the 20 inmates taken off death row referenced in the press release issued by the District Attorney's Office dated April 20, 2023 entitled "*District Attorney Gascón Outlines Accomplishments in 2023 Midterm Report*" (copy enclosed herewith).

The request above reasonably describes identifiable record(s) or information to be produced from that record. Throughout this request, the term "records" includes but is not limited to any paper or electronic communication, memoranda, correspondence, letters, emails, and instant messages or other similar materials.

To make this request more manageable and easy for the District Attorney to fulfill, I request that these records be provided electronically. If the records are available electronically, please email them to GSRAS2017@gmail.com.

If you are unable to comply with this request because you believe it is not focused or effective, *California Government Code* § 6253.1 (a) requires you to: (1) assist

Page 2

Green & Shinee

December 1, 2023

To: Kathryn Albracht, Litigation Coordinator  
Deputy District Attorney/Custodian of Records

Re: CPRA Request

me in identifying the records and information that are responsive to my request or to the purpose of my request; (2) describe the information technology and physical location in which the records exist; and (3) provide me with suggestions for overcoming any practical basis for denying access to the records or information I am seeking.

Pursuant to *Government Code* § 6253(b), I ask that you make the records “promptly available” I believe that no express provisions of law exist that exempt the records from disclosure. As you determine whether this request seeks copies of disclosable public records, be mindful that Article I, Section 3 (b) (2) of the California Constitution requires you to (1) broadly construe a statute or other authority if it furthers the right of access to the information I have requested; and (2) too narrowly construe a statute, court rule or other authority if it limits my right to access.

If a portion of the information I have requested is exempt from disclosure by express provisions of law, *Government Code* § 6253 (a) additionally requires segregation and deletion of that material so that the remainder of the information may be released. If you determine that any express provision of law exists to exempt from disclosure all or a portion of the material I have requested, *Government Code* § 6253 (c) requires notification to me of the reasons for the determination not later than (10) ten days from your receipt of this request.

*Government Code* § 6253(d) prohibits the use of the 10-day period, or any other provisions of the Public Records Act, “to delay access for purposes of inspecting public records.” If it would be helpful to the District Attorney’s Office, I am willing to accept all of the material in an electronic format if at all possible to reduce copying and to help our environment. Because this request is a matter of public concern, we request a fee waiver. Providing the documents in an electronic format would eliminate the need to copy the materials and provides another basis for our requested fee waiver. If, however, such a waiver is denied, we will reimburse the County for the reasonable cost of copying. Please inform us in advance if the cost will be greater than \$50.

Page 3

Green & Shinee

December 1, 2023

To: Kathryn Albracht, Litigation Coordinator  
Deputy District Attorney/Custodian of Records

Re: CPRA Request

Thank you in advance for your time and attention to this matter. If we can provide any clarification that will help expedite your attention to my request, please contact me at GSRAS2017@gmail.com.

Very truly yours,

GREEN & SHINEE, A PC

*RA Shinee*

RICHARD A. SHINEE

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County  
21L-039\DLKAlbracht231201.plm

Exhibit “O”



Green & Shinee  
attorneys at law

Richard A. Shinee

a professional corporation  
11333 Moorpark Street, Suite 387  
Studio City, California 91602

telephone: (818) 986-2440, (818) 266-1773

Harry Benton Green  
1942-1996

of counsel  
Goldschmid, Silver & Spindel

December 4, 2023

***Via Email & US mail***  
KAlbracht@da.lacounty.gov

Kathryn Albracht, Litigation Coordinator  
Los Angeles County District Attorney's Office  
211 W. Temple Street, Suite 1200  
Los Angeles, CA 90012

Re: California Public Records Act Request for Records

Dear Ms. Albracht:

This letter is a request to obtain records in possession of the Los Angeles District Attorney's Office pursuant to the California Public Records Act (*Government Code* § 6250 et seq.), Article I, Section 3 of the *California Constitution*, Chapters 67.25, and the Ralph M. Brown Act (*Government Code* §54950).

The records I am requesting are the defendants' names and case numbers for all pending capital habeas cases.

The request above reasonably describes identifiable record(s) or information to be produced from that record. Throughout this request, the term "records" includes but is not limited to any paper or electronic communication, memoranda, correspondence, letters, emails, and instant messages or other similar materials.

To make this request more manageable and easy for the District Attorney to fulfill, I request that these records be provided electronically. If the records are available electronically, please email them to GSRAS2017@gmail.com.

If you are unable to comply with this request because you believe it is not focused or effective, *California Government Code* § 6253.1 (a) requires you to: (1) assist

Page 2

Green & Shinee

December 4, 2023

To: Kathryn Albracht, Litigation Coordinator  
Deputy District Attorney/Custodian of Records

Re: CPRA Request

me in identifying the records and information that are responsive to my request or to the purpose of my request; (2) describe the information technology and physical location in which the records exist; and (3) provide me with suggestions for overcoming any practical basis for denying access to the records or information I am seeking.

Pursuant to *Government Code* § 6253(b), I ask that you make the records “*promptly available*” I believe that no express provisions of law exist that exempt the records from disclosure. As you determine whether this request seeks copies of disclosable public records, be mindful that Article I, Section 3 (b) (2) of the California Constitution requires you to (1) broadly construe a statute or other authority if it furthers the right of access to the information I have requested; and (2) too narrowly construe a statute, court rule or other authority if it limits my right to access.

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*Government Code* § 6253(d) prohibits the use of the 10-day period, or any other provisions of the Public Records Act, “*to delay access for purposes of inspecting public records.*” If it would be helpful to the District Attorney’s Office, I am willing to accept all of the material in an electronic format if at all possible to reduce copying and to help our environment. Because this request is a matter of public concern, we request a fee waiver. Providing the documents in an electronic format would eliminate the need to copy the materials and provides another basis for our requested fee waiver. If, however, such a waiver is denied, we will reimburse the County for the reasonable cost of copying. Please inform us in advance if the cost will be greater than \$50.

Page 3

Green & Shinee

December 4, 2023

To: Kathryn Albracht, Litigation Coordinator  
Deputy District Attorney/Custodian of Records

Re: CPRA Request

Thank you in advance for your time and attention to this matter. If we can provide any clarification that will help expedite your attention to my request, please contact me at GSRAS2017@gmail.com.

Very truly yours,

GREEN & SHINEE, A PC

*RA Shinee*

RICHARD A. SHINEE

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County  
21L-039\DLKAlbracht231204.plm

**VERIFICATION**

1. I, Michele Hanisee, am the President of the Association of Deputy District Attorneys for Los Angeles County (ADDA), the Petitioner in the above matter.

2. I have read the foregoing Petition for Peremptory Writ of Mandate and Complaint for Declaratory Relief and know its contents.

3. The matters stated in the Petition and Complaint are true of my own knowledge and belief, except as to those matters stated on information and belief, and as to those matter, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, to the best of my knowledge.

Executed this 31st day of January, 2024 at Los Angeles, California

---

Michele Hanisee, President  
Association of Deputy District Attorneys for  
Los Angeles County