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RICHARD A. SHINEE, SBN # 062767
GREEN & SHINEE, A PC
Telephone: (818) 266-1773
Email: GSRAS2017@gmail.com

ELIZABETH J. GIBBONS, SBN # 147033
THE GIBBONS FIRM, P.C.
835 Wilshire Blvd., 5th Floor
Los Angeles, CA 90017
Telephone: (323) 591-6000
Email: EGibbons@thegibbonsfirm.com

Attorneys for Petitioners, Association of Deputy
District Attorneys for Los Angeles County and Its Members

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
PEREMPTORY 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 Government Code section 7920.500 et seq.

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

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

9 **FACTS RELEVANT TO ALL CLAIMS**

10 **May 8, 2024 CPRA Request to County of Los Angeles**

11 9. On or about May 8, 2024, Petitioner ADDA sent a request pursuant to the CPRA
12 to **Respondent, County of Los Angeles** Custodian of Records, whose duties and
13 responsibilities were, in part, to respond to CPRA requests. On May 8, 2024, a CPRA request
14 (see, Exhibit “A” attached hereto and incorporated by reference) was made for “*All emails sent*
15 *by Diana Teran using her official lacounty.gov email from April 25, 2024 to present.*”

16 10. On or about May 9, 2024, **Respondent, County of Los Angeles** responded to
17 Petitioner ADDA’s May 8, 2024 request by email from the Office of Countywide
18 Communications informing Petitioner that the Public Records Act Request had been forwarded
19 to the District Attorney’s office. (See, Exhibit “B” attached hereto and incorporated by
20 reference.)

21 11. From the date of the CPRA request to the present, **Respondent, County of Los**
22 **Angeles** has not provided any documents in response to Petitioner ADDA’s May 9, 2024 request
23 nor has **Respondent, County of Los Angeles** requested an extension.

24 **May 8, 2024 CPRA Request to District Attorney’s Office of Los Angeles County**

25 12. On or about May 8, 2024, Petitioner ADDA sent a request pursuant to the CPRA
26 to **Respondent, District Attorney of Los Angeles County** Custodian of Records, whose duties
27 and responsibilities were, in part, to respond to CPRA requests. On May 8, 2024, a CPRA
28 request (see, Exhibit “C” attached hereto and incorporated by reference) was made for “*All*

1 *emails sent by Diana Teran using her official lacounty.gov email from April 25, 2024 to*
2 *present.”*

3 13. On June 3, 2024, **Respondent, District Attorney’s Office of Los Angeles**
4 **County**, through Deputy County Counsel Adam Sexton delayed responding to Petitioner,
5 invoking Government Code § 7922.535(b) for a 14 day extension until June 17, 2024. (See,
6 Exhibit “D” attached hereto and incorporated by reference.)

7 14. Thereafter, on June 17, 2024, **Respondent, District Attorney’s Office of Los**
8 **Angeles County**, through Deputy County Counsel Adam Sexton delayed responding to
9 Petitioner, invoking Government Code § 7922.535(b) for an additional 23 day extension until
10 July 10, 2024. (See, Exhibit “E” attached hereto and incorporated by reference.)

11 15. Thereafter, on July 17, 2024, **Respondent, District Attorney’s Office of Los**
12 **Angeles County**, through Deputy County Counsel Adam Sexton delayed responding to
13 Petitioner, invoking Government Code § 7922.535(b) for an additional 29 day extension until
14 August 8, 2024. (See, Exhibit “F” attached hereto and incorporated by reference.)

15 16. Thereafter, on August 8, 2024, **Respondent, District Attorney’s Office of Los**
16 **Angeles County**, through Deputy County Counsel Adam Sexton, produced some documents in
17 response to Petitioner ADDA’s May 8, CPRA request, and claimed that portions of the CPRA
18 request were withheld and/or redacted, asserting that some of the requested records and
19 information were exempt from disclosure under the California Public Records Act for reasons
20 including, but not limited to, attorney work product exemptions, attorney-client privilege
21 exemptions, ongoing litigation exemptions, the Deliberative Process exemptions, Personnel
22 Records exemptions, and the public interest served by not making the records public clearly
23 outweighs the public interest served by disclosure of the records. The County also withheld
24 and/or redacted records asserting that some of the records and information were exempt from
25 disclosure as they are part of criminal investigations. (See, Exhibit “G” attached hereto and
26 incorporated by reference.)

27 **May 9, 2024 CPRA Request to County of Los Angeles**

28 17. On or about May 9, 2024, Petitioner ADDA sent a request pursuant to the CPRA

1 to **Respondent, County of Los Angeles** Custodian of Records, whose duties and
2 responsibilities were, in part, to respond to CPRA requests. On May 9, 2024, a CPRA request
3 (see, Exhibit “H” attached hereto and incorporated by reference) was made for *“All emails sent*
4 *to Diana Teran using her official lacounty.gov email from April 25, 2024 to present.”*

5 18. On or about May 10, 2024, **Respondent, County of Los Angeles** responded to
6 Petitioner ADDA’s May 9, 2024 request by email from the Office of Countywide
7 Communications informing Petitioner that the Public Records Act Request had been forwarded
8 to the District Attorney’s office. (See, Exhibit “I” attached hereto and incorporated by
9 reference.)

10 19. From the date of the CPRA request to the present, **Respondent, County of Los**
11 **Angeles** has not provided any documents in response to Petitioner ADDA’s May 9, 2024 request
12 nor has **Respondent, County of Los Angeles** requested an extension.

13 **May 9, 2024 CPRA Request to District Attorney’s Office of Los Angeles County**

14 20. On or about May 9, 2024, Petitioner ADDA sent a request pursuant to the CPRA
15 to **Respondent, District Attorney of Los Angeles County** Custodian of Records, whose duties
16 and responsibilities were, in part, to respond to CPRA requests. On May 9, 2024, a CPRA
17 request (see, Exhibit “J” attached hereto and incorporated by reference) was made for *“All*
18 *emails sent to Diana Teran using her official lacounty.gov email from April 25, 2024 to present.”*

19 21. From the date of the CPRA request to the present, **Respondent, District**
20 **Attorney of Los Angeles County** has not provided any documents in response to Petitioner
21 ADDA’s May 9, 2024 request nor has **Respondent, District Attorney of Los Angeles County**
22 requested an extension.

23 **May 10, 2024 CPRA Request to County of Los Angeles**

24 22. On or about May 10, 2024, Petitioner ADDA sent a request pursuant to the CPRA
25 to **Respondent, County of Los Angeles** Custodian of Records, whose duties and responsibilities
26 were, in part, to respond to CPRA requests. On May 10, 2024, a CPRA request (see, Exhibit
27 “K” attached hereto and incorporated by reference) was made for *“1. Any and all documents*
28 *showing Diana Teran’s current employment status with the District of Attorney’s Office; 2. Any*

1 *all documents reflecting Diana Teran's current pay status; 3. Any and all documents reflecting a*
2 *change in Diana Teran's work assignment after April 23, 2024".*

3 23. On June 3, 2024, **Respondent, County of Los Angeles**, through Deputy County
4 Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
5 § 7922.535(b) for a 14 day extension until June 17, 2024. Mr. Sexton's letter asserts a May 10,
6 2024 extension to respond. The May 10, 2024 extension letter was never received by Petitioner
7 or Petitioner's Counsel. (See, Exhibit "L" attached hereto and incorporated by reference.)

8 24. Thereafter, on June 17, 2024, **Respondent, County of Los Angeles**, through
9 Deputy County Counsel Adam Sexton, produced two documents in response to Petitioner
10 ADDA's May 10, CPRA request; a heavily redacted copy of a screen shot of the eHR1 computer
11 record of Diana Teran, and a heavily redacted copy of a screen shot of the PAY-ODVOE
12 Verification of Employment computer record of Diana Teran, claiming that the County withheld
13 and/or redacted records as some of the requested records and information are exempt from
14 disclosure under the CPRA for reasons including, but not limited to, the Personnel Records
15 exemption and the public interest served by not making the record public clearly outweighs the
16 public interest served by disclosure of the record. (See, Exhibit "M" attached hereto and
17 incorporated by reference.)

18 **May 10, 2024 CPRA Request to District Attorney's Office of Los Angeles County**

19 25. On or about May 10, 2024, Petitioner ADDA sent a request pursuant to the CPRA
20 to **Respondent, District Attorney of Los Angeles County** Custodian of Records, whose duties
21 and responsibilities were, in part, to respond to CPRA requests. On May 10, 2024, a CPRA
22 request (see, Exhibit "N" attached hereto and incorporated by reference) was made for "*1. Any*
23 *and all documents showing Diana Teran's current employment status with the District of*
24 *Attorney's Office; 2. Any all documents reflecting Diana Teran's current pay status; 3. Any and*
25 *all documents reflecting a change in Diana Teran's work assignment after April 23, 2024".*

26 26. From the date of the CPRA request to the present, **Respondent, District**
27 **Attorney of Los Angeles County** has not provided any documents in response to Petitioner
28 ADDA's May 10, 2024 request nor has **Respondent, District Attorney of Los Angeles County**

1 requested an extension.

2 **May 13, 2024 CPRA Request to County of Los Angeles**

3 27. On or about May 13, 2024, Petitioner ADDA sent a request pursuant to the CPRA
4 to **Respondent, County of Los Angeles** Custodian of Records, whose duties and
5 responsibilities were, in part, to respond to CPRA requests. On May 13, 2024, a CPRA request
6 (see, Exhibit “O” attached hereto and incorporated by reference) was made for “1. Any and all
7 emails by and between any employee of the District Attorney's Office and/or documentation from
8 April 25, 2024 to the present, reflecting the date and time that Diana Teran's utilization, access
9 to and suspension from access to the following systems occurred: PIMS, CLETS, CCHRS, DCU,
10 SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system; 2. Any
11 and all emails by and between any employee of the District Attorney's Office and/or
12 documentation from April 25, 2024 to the present, reflecting the date and time that Diana
13 Teran's editing capabilities for the following systems occurred: PIMS, CLETS, CCHRS, DCU,
14 SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system; 3. Any
15 and all emails by and between any employee of the District Attorney's Office and/or
16 documentation from April 25, 2024 to the present, reflecting the date and time that Diana
17 Teran's passwords for access to the following systems were disabled or suspended: PIMS,
18 CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal
19 County email system; 4. Any and all emails by and between any employee of the District
20 Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date
21 and time that Diana Teran's County and/or District Attorney's Office laptop was surrendered,
22 seized, or disabled; 5. Any and all emails by and between any employee of the District
23 Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date
24 and time that Diana Teran's County and/or District Attorney's Office cell phone was
25 surrendered, seized, or disabled”.

26 28. On June 6, 2024, **Respondent, County of Los Angeles**, through Deputy County
27 Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
28 § 7922.535(b) for a 14 day extension until June 20, 2024. Mr. Sexton’s letter asserts a May 23,

1 2024 extension to respond. The May 23, 2024 extension letter was never received by Petitioner
2 or Petitioner’s Counsel. (See, Exhibit “P” attached hereto and incorporated by reference.)

3 29. On June 20, 2024, **Respondent, County of Los Angeles**, through Deputy County
4 Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
5 § 7922.535(b) for a further 32 day extension until July 22, 2024. (See, Exhibit “Q” attached
6 hereto and incorporated by reference.)

7 30. On July 22, 2024, **Respondent, County of Los Angeles**, through Deputy County
8 Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
9 § 7922.535(b) for a further 31 day extension until August 22, 2024. (See, Exhibit “R” attached
10 hereto and incorporated by reference.)

11 31. On August 22, 2024, **Respondent, County of Los Angeles**, through Deputy
12 County Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
13 § 7922.535(b) for a further 32 day extension until September 24, 2024. (See, Exhibit “S”
14 attached hereto and incorporated by reference.)

15 **May 13, 2024 CPRA Request to District Attorney’s Office of Los Angeles County**

16 32. On or about May 13, 2024, Petitioner ADDA sent a request pursuant to the CPRA
17 to **Respondent, District Attorney of Los Angeles County** Custodian of Records, whose duties
18 and responsibilities were, in part, to respond to CPRA requests. On May 13, 2024, a CPRA
19 request (see, Exhibit “T” attached hereto and incorporated by reference) was made for “1. *Any*
20 *and all emails by and between any employee of the District Attorney's Office and/or*
21 *documentation from April 25, 2024 to the present, reflecting the date and time that Diana*
22 *Teran's utilization, access to and suspension from access to the following systems occurred:*
23 *PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal*
24 *County email system; 2. Any and all emails by and between any employee of the District*
25 *Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date*
26 *and time that Diana Teran's editing capabilities for the following systems occurred: PIMS,*
27 *CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal*
28 *County email system; 3. Any and all emails by and between any employee of the District*

1 *Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date*
2 *and time that Diana Teran's passwords for access to the following systems were disabled or*
3 *suspended: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint*
4 *site, internal County email system; 4. Any and all emails by and between any employee of the*
5 *District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the*
6 *date and time that Diana Teran's County and/or District Attorney's Office laptop was*
7 *surrendered, seized, or disabled; 5. Any and all emails by and between any employee of the*
8 *District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the*
9 *date and time that Diana Teran's County and/or District Attorney's Office cell phone was*
10 *surrendered, seized, or disabled”.*

11 33. From the date of the CPRA request to the present, **Respondent, District**
12 **Attorney of Los Angeles County** has not provided any documents in response to Petitioner
13 ADDA’s May 13, 2024 request nor has **Respondent, District Attorney of Los Angeles County**
14 requested an extension.

15 **May 14, 2024 CPRA Request to County of Los Angeles**

16 34. On or about May 14, 2024, Petitioner ADDA sent a request pursuant to the CPRA
17 to **Respondent, County of Los Angeles** Custodian of Records, whose duties and
18 responsibilities were, in part, to respond to CPRA requests. On May 14, 2024, a CPRA request
19 (see, Exhibit “U” attached hereto and incorporated by reference) was made for “*Any and all*
20 *emails or other forms of communication by and between Diane Teran and the following*
21 *individuals for the period between January 26, 2024 and the present with regard to People v.*
22 *Rebecca Grossman: Garrett Dameron, Ryan Gould, Jamie Castro, Cynthia Nakao, Stephanie*
23 *Mire, James Garrison, Joseph Iniguez, and George Gascon”.*

24 35. On or about May 15, 2024, **Respondent, County of Los Angeles** responded to
25 Petitioner ADDA’s May 14, 2024 request by email from the Office of Countywide
26 Communications informing Petitioner that the Public Records Act Request had been forwarded
27 to the District Attorney’s office. (See, Exhibit “V” attached hereto and incorporated by
28 reference.)

1 36. On June 7, 2024, **Respondent, County of Los Angeles**, through Deputy County
2 Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
3 § 7922.535(b) for a 14 day extension until June 21, 2024. Mr. Sexton’s letter asserts a May 24,
4 2024 extension to respond. The May 24, 2024 extension letter was never received by Petitioner
5 or Petitioner’s Counsel. (See, Exhibit “W” attached hereto and incorporated by reference.)

6 37. On June 21, 2024, **Respondent, County of Los Angeles**, through Deputy County
7 Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
8 § 7922.535(b) for a further 32 day extension until July 23, 2024. (See, Exhibit “X” attached
9 hereto and incorporated by reference.)

10 38. On July 23, 2024, **Respondent, County of Los Angeles**, through Deputy County
11 Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
12 § 7922.535(b) for a further 31 day extension until August 23, 2024. (See, Exhibit “Y” attached
13 hereto and incorporated by reference.)

14 39. On August 22, 2024, **Respondent, County of Los Angeles**, through Deputy
15 County Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
16 § 7922.535(b) for a further 32 day extension until September 24, 2024. (See, Exhibit “S”
17 attached hereto and incorporated by reference.)

18 **May 14, 2024 CPRA Request to District Attorney’s Office of Los Angeles County**

19 40. On or about May 14, 2024, Petitioner ADDA sent a request pursuant to the CPRA
20 to **Respondent, District Attorney of Los Angeles County** Custodian of Records, whose duties
21 and responsibilities were, in part, to respond to CPRA requests. On May 14, 2024, a CPRA
22 request (see, Exhibit “AA” attached hereto and incorporated by reference) was made “*Any and*
23 *all emails or other forms of communication by and between Diane Teran and the following*
24 *individuals for the period between January 26, 2024 and the present with regard to People v.*
25 *Rebecca Grossman: Garrett Dameron, Ryan Gould, Jamie Castro, Cynthia Nakao, Stephanie*
26 *Mire, James Garrison, Joseph Iniguez, and George Gascon”.*

27 41. From the date of the CPRA request to the present, **Respondent, District**
28 **Attorney of Los Angeles County** has not provided any documents in response to Petitioner

1 ADDA's May 14, 2024 request nor has **Respondent, District Attorney of Los Angeles County**
2 requested an extension.

3 **May 15, 2024 CPRA Request to County of Los Angeles**

4 42. On or about May 15, 2024, Petitioner ADDA sent a request pursuant to the CPRA
5 to **Respondent, County of Los Angeles** Custodian of Records, whose duties and
6 responsibilities were, in part, to respond to CPRA requests. On May 15, 2024, a CPRA request
7 (see, Exhibit "BB" attached hereto and incorporated by reference) was made for "*any and all*
8 *documentation reflecting the total number of days teleworked between April 1, 2023 and April*
9 *30, 2024 for each of the following persons: 1. Joseph Iniguez; 2. Tiffany Blacknell; 3. Diana*
10 *Teran; 4. Shelan Joseph; 5. Ron Geltz; 6. Marc Beart; 7. Stephanie Mire; 8. Laura Jane Kesner;*
11 *9. Larry Droeger; 10. James Garrison; 11. Priscilla Musso; 12. Arisa Mattson; 13. Navjot*
12 *Kaur; 14. Gregory Apt; 15. Nancy Theberge; 16. Kimberly Toney; 17. John Perroni III; 18.*
13 *Robert Conley; 19. Parag Agrawal*".

14 43. On June 11, 2024, **Respondent, County of Los Angeles**, through Deputy County
15 Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
16 § 7922.535(b) for a 14 day extension until June 25, 2024. Mr. Sexton's letter asserts a May 28,
17 2024 extension to respond. The May 28, 2024 extension letter was never received by Petitioner
18 or Petitioner's Counsel. (See, Exhibit "CC" attached hereto and incorporated by reference.)

19 44. On June 25, 2024, **Respondent, County of Los Angeles**, through Deputy County
20 Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
21 § 7922.535(b) for a further 30 day extension until July 25, 2024. (See, Exhibit "DD" attached
22 hereto and incorporated by reference.)

23 45. On July 25, 2024, **Respondent, County of Los Angeles**, through Deputy County
24 Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
25 § 7922.535(b) for a further 31 day extension until August 25, 2024. (See, Exhibit "EE" attached
26 hereto and incorporated by reference.)

27 46. On August 23, 2024, **Respondent, County of Los Angeles**, through Deputy
28 County Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code

1 § 7922.535(b) for a further 32 day extension until September 25, 2024. (See, Exhibit “FF”
2 attached hereto and incorporated by reference.)

3 **May 15, 2024 CPRA Request to District Attorney’s Office of Los Angeles County**

4 47. On or about May 15, 2024, Petitioner ADDA sent a request pursuant to the CPRA
5 to **Respondent, District Attorney of Los Angeles County** Custodian of Records, whose duties
6 and responsibilities were, in part, to respond to CPRA requests. On May 15, 2024, a CPRA
7 request (see, Exhibit “GG” attached hereto and incorporated by reference) was made “*any and*
8 *all documentation reflecting the total number of days teleworked between April 1, 2023 and*
9 *April 30, 2024 for each of the following persons: 1. Joseph Iniguez; 2. Tiffany Blacknell; 3.*
10 *Diana Teran; 4. Shelan Joseph; 5. Ron Geltz; 6. Marc Beart; 7. Stephanie Mire; 8. Laura Jane*
11 *Kesner; 9. Larry Droeger; 10. James Garrison; 11. Priscilla Musso; 12. Arisa Mattson; 13.*
12 *Navjot Kaur; 14. Gregory Apt; 15. Nancy Theberge; 16. Kimberly Toney; 17. John Perroni III;*
13 *18. Robert Conley; 19. Parag Agrawal”.*

14 48. On May 28, 2024, **Respondent, District Attorney of Los Angeles County**,
15 through letter from Kathryn Albracht, Special Assistant Deputy District Attorney, delayed
16 responding to Petitioner, invoking Government Code § 7922.535(b) for a 14 day extension until
17 June 11, 2024. (See, Exhibit “HH” attached hereto and incorporated by reference.)

18 49. On June 6, 2024, **Respondent, District Attorney of Los Angeles County**,
19 through letter from Denise Fox, Litigation Coordinator, delayed responding to Petitioner,
20 invoking Government Code § 7922.535(b) for a 14 day extension until June 11, 2024. (See,
21 Exhibit “II” attached hereto and incorporated by reference.)

22 50. On June 11, 2024, **Respondent, District Attorney of Los Angeles County**,
23 through letter from Denise Fox, Litigation Coordinator, further delayed responding to Petitioner,
24 invoking Government Code § 7922.535(b) for a further 14 day extension until June 25, 2024.
25 (See, Exhibit “JJ” attached hereto and incorporated by reference.)

26 51. From the date of the CPRA request to the present, **Respondent, District**
27 **Attorney of Los Angeles County** has not provided any documents in response to Petitioner
28 ADDA’s May 14, 2024 request nor has **Respondent, District Attorney of Los Angeles County**

1 requested an extension past June 25, 2024.

2 **May 16, 2024 CPRA Request to County of Los Angeles**

3 52. On or about May 16, 2024, Petitioner ADDA sent a request pursuant to the CPRA
4 to **Respondent, County of Los Angeles** Custodian of Records, whose duties and
5 responsibilities were, in part, to respond to CPRA requests. On May 16, 2024, a CPRA request
6 (see, Exhibit “KK” attached hereto and incorporated by reference) was made for “*copies of all*
7 *Annual Policy Review Acknowledgment Forms signed by Diana Teran for the duration of the*
8 *time she was employed by the County of Los Angeles in any capacity, and any document or*
9 *communication referring to Diana Teran’s annual review of County of Los Angeles policies*”.

10 53. On June 11, 2024, **Respondent, County of Los Angeles**, through Deputy County
11 Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
12 § 7922.535(b) for a 14 day extension until June 25, 2024. Mr. Sexton’s letter asserts a May 28,
13 2024 extension to respond. The May 28, 2024 extension letter was never received by Petitioner
14 or Petitioner’s Counsel. (See, Exhibit “LL” attached hereto and incorporated by reference.)

15 54. Thereafter, on June 11, 2024, **Respondent, County of Los Angeles**, through
16 Deputy County Counsel Amara Kirby, produced 18 pages of onboarding human resources forms
17 which were blank and policies in response to Petitioner ADDA’s May 16, CPRA request;
18 claiming that the County withheld all of the records located during its search, asserting that the
19 records are exempt from disclosure as they were records contained in a personnel file where
20 disclosure would constitute an unwarranted invasion of personal privacy which are exempt from
21 disclosure under section 7927.700; and further that the records were protected by section 7922
22 asserting that the public interest served by not disclosing the record clearly outweighed the
23 public interest served by disclosure of the record. (See, Exhibit “MM” attached hereto and
24 incorporated by reference.)

25 55. On June 25, 2024, **Respondent, County of Los Angeles**, through Deputy County
26 Counsel Adam Sexton delayed responding to Petitioner, invoking Government Code
27 § 7922.535(b) for a further 30 day extension until July 25, 2024. (See, Exhibit “NN” attached
28 hereto and incorporated by reference.)

1 56. On July 25, 2024, **Respondent, County of Los Angeles**, through Deputy County
2 Counsel Adam Sexton further delayed responding to Petitioner, invoking Government Code
3 § 7922.535(b) for a further 20 day extension until August 15, 2024. (See, Exhibit “OO” attached
4 hereto and incorporated by reference.)

5 57. On August 2, 2024, **Respondent, County of Los Angeles**, through Deputy
6 County Counsel Adam Sexton responding to Petitioner, invoking Section 7922 to withhold all of
7 the records located during its search, asserting that the records are exempt from disclosure as
8 they were records contained in a personnel file where disclosure would constitute an
9 unwarranted invasion of personal privacy which are exempt from disclosure under section
10 7927.700; and further that the records were protected by section 7922 asserting that the public
11 interest served by not disclosing the record clearly outweighed the public interest served by
12 disclosure of the record. (See, Exhibit “PP” attached hereto and incorporated by reference.)

13 **May 16, 2024 CPRA Request to District Attorney’s Office of Los Angeles County**

14 58. On or about May 16, 2024, Petitioner ADDA sent a request pursuant to the CPRA
15 to **Respondent, District Attorney of Los Angeles County** Custodian of Records, whose duties
16 and responsibilities were, in part, to respond to CPRA requests. On May 16, 2024, a CPRA
17 request (see, Exhibit “QQ” attached hereto and incorporated by reference) was made for “*copies*
18 *of all Annual Policy Review Acknowledgment Forms signed by Diana Teran for the duration of*
19 *the time she was working for the County of Los Angeles District Attorney’s Office in any*
20 *capacity, and any document or communication referring to Diana Teran’s annual review of*
21 *County of Los Angeles District Attorney’s Office policies.*”

22 59. On August 1, 2024, **Respondent, District Attorney of Los Angeles County**,
23 through Deputy County Counsel Adam Sexton delayed responding to Petitioner, invoking
24 Government Code § 7922.535(b) for a 30 day extension until August 30, 2024. (See, Exhibit
25 “SS” attached hereto and incorporated by reference.)

26 60. **Respondent, District Attorney of Los Angeles County**, through Deputy County
27 Counsel Adam Sexton responding to Petitioner, invoking Section 7922 to withhold all of the
28 records located during its search, asserting that the records are exempt from disclosure as they

1 were records contained in a personnel file where disclosure would constitute an unwarranted
2 invasion of personal privacy which are exempt from disclosure under section 7927.700; and
3 further that the records were protected by section 7922 asserting that the public interest served
4 by not disclosing the record clearly outweighed the public interest served by disclosure of the
5 record. **Respondent, District Attorney of Los Angeles County**, produced 18 pages of
6 onboarding human resources forms which were blank and policies in response to Petitioner
7 ADDA's May 16, CPRA request. (See, Exhibit "TT" attached hereto and incorporated by
8 reference.)

9
10 **FIRST CAUSE OF ACTION**
(BY PETITIONER ADDA AGAINST ALL RESPONDENTS)
PEREMPTORY WRIT OF MANDATE CCP § 1085

11 61. Petitioners re-allege and incorporate herein by reference, as though set forth at
12 length, each and every allegation contained in Paragraphs 1 through 60, inclusive, of this Petition
13 for Peremptory Writ of Mandate.

14 62. Respondents, and each of them, had and presently have a ministerial duty to
15 comply with the statutory mandates of Government Code § 7920.500, *et seq.*

16 63. Petitioner, on behalf of its members is beneficially interested in the outcome of
17 this case in that Petitioner ADDA and its individual members are the intended beneficiaries of
18 Government Code § 7920.500.

19 64. Petitioner has no plain, speedy, or adequate remedy in the ordinary course of the
20 law other than the relief sought by this Petition.

21 **SECOND CAUSE OF ACTION**
(BY PETITIONER ADDA AGAINST ALL RESPONDENTS)
22 **DECLARATORY RELIEF CCP § 1060**
23

24 65. Petitioners re-allege and incorporate herein by reference, as though set forth at
25 length, each and every allegation contained in Paragraphs 1 through 64, inclusive, of this Petition
26 for Peremptory Writ of Mandate.

27 66. An actual, present controversy exists between Petitioner ADDA and Respondents
28 concerning their respective duties and obligations under Government Code § 7920.500 in that

1 Petitioner ADDA claims and contends that the documents sought hereinabove alleged are all
2 within the ambit of the California Public Records Act.

3 67. At all times herein mentioned, Respondents claim and contend that the documents
4 set forth in §§ 9 through 60 above are not subject to the California Public Records Act or are
5 exempt from same.

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

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

10 1. That the Court issue a Peremptory Writ of Mandate upon further notice pursuant
11 to Code of Civil Procedure § 1085 immediately directing **Respondents COUNTY OF LOS**
12 **ANGELES DISTRICT ATTORNEY’S OFFICE; GEORGE GASCÓN, DISTRICT**
13 **ATTORNEY OF LOS ANGELES COUNTY** and each of them, together with their officers,
14 agents, servants, employees, representatives, and all persons acting in concert or participating
15 with them, to disclose all records responsive to Petitioner ADDA’s May 5, 2024, May 9, 2024,
16 May 10, 2024, May 13, 2024, May 14, 2024, May 15, 2024 and May 16, 2024 CPRA requests
17 or, in the alternative, an Order to Show Cause why these public records should not be released;

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

23 3. That the Court enter an order allowing Petitioner ADDA to recover attorneys fees
24 in the instant action pursuant to former Government Code § 7923.115, and/or Code of Civil
25 Procedure § 1021.5, and/or ;

26 4. For Petitioners’ cost of suit incurred herein;

27 ///

28 ///

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

3 Dated: September 11, 2024

Respectfully submitted,

GREEN & SHINEE, A PC

5
6 By: RA Shinee
7 Richard A. Shinee, Attorneys for Petitioner
8 Association of Deputy District Attorneys for
Los Angeles County (ADDA)

9 Dated: September 11, 2024

THE GIBBONS FIRM, P.C.

10
11 By: Elizabeth J. Gibbons
12 Elizabeth J. Gibbons, Attorneys for
13 Petitioner, Association of Deputy District
14 Attorneys for Los Angeles County (ADDA)
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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

May 8, 2024

Via Email & US mail
PIO@ceo.lacounty.gov

Custodian of Records
County of Los Angeles
211 W. Temple Street, Suite 1200
Los Angeles, CA 90012

Re: California Public Records Act Request for Records

Dear Ladies and Gentlemen:

This letter is a request to obtain records in possession of the County of Los Angeles 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:

All emails sent by Diana Teran using her official lacounty.gov email from April 25, 2024 to present.

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 emails as well as any attachments thereto, in any form.

If there is privileged information in any of the emails requested, or the attachments thereto, please preserve the original email and attachment, and provide the undersigned with a copy of the email and attachment, redacting only the claimed privileged material.

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

Page 2

Green & Shinee

May 8, 2024

To: County of Los Angeles
Custodian of Records

Re: CPRA Request

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.

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 County of Los Angeles, 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

May 8, 2024

To: County of Los Angeles
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
General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County
21L-039\DLCOLA240508.plm

EXHIBIT “B”



Richard Shinee <gsras2017@gmail.com>

California Public Records Act Request for Records

Office of Countywide Communications <pio@ceo.lacounty.gov>
To: Richard Shinee <gsras2017@gmail.com>

Thu, May 9, 2024 at 2:29 PM

Good afternoon,

Thank you for your email. We forwarded it to the District Attorney's office, and they are processing it. If you'd like to follow up with them, you may contact them at pra@da.lacounty.gov.

Thank you,

Office of Countywide Communications

Los Angeles County Chief Executive Office

For general information: Call (213) 974-1234 - Available 24/7

For media inquiries and Public Records Act requests: Call (213) 974-1311



Find more information in the Guide to County Services - a directory that quickly connects you with County services.



From: Richard Shinee <gsras2017@gmail.com>
Sent: Wednesday, May 8, 2024 4:50 PM
To: Office of Countywide Communications <pio@ceo.lacounty.gov>
Subject: California Public Records Act Request for Records

CAUTION: External Email. Proceed Responsibly.

Dear Ladies and Gentlemen:

Attached please find the May 8, 2024 public records act request letter from Richard A. Shinee, Esq., requesting copies of all emails and attachments sent by Diana Teran using her official [lacounty.gov](mailto:teran@lacounty.gov) email from April 25, 2024 to present.

Very truly yours,

Peggy Madsen on behalf of

RICHARD A. SHINEE, ESQ.

GREEN & SHINEE, A P.C.

11333 Moorpark Street

Suite 387

Studio City, CA 91602

Phone: (818) 266-1773

EXHIBIT “C”

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 8, 2024

Via Email & US mail
PRA@da.lacounty.gov

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 Ladies and Gentlemen:

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:

All emails sent by Diana Teran using her official lacounty.gov email from April 25, 2024 to present.

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 emails as well as any attachments thereto, in any form.

If there is privileged information in any of the emails requested, or the attachments thereto, please preserve the original email and attachment, and provide the undersigned with a copy of the email and attachment, redacting only the claimed privileged material.

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.

Page 2

Green & Shinee

May 8, 2024

To: Custodian of Records
Deputy District Attorney/Custodian of Records

Re: CPRA Request

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.

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

May 8, 2024

To: Custodian of Records
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
General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County
21L-039\DLDAOPRA240508.plm

EXHIBIT “D”



County of Los Angeles

June 3, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request of May 8, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County Office of the County Counsel ("Counsel") responds to a request you made dated May 8, 2024 for certain records sent to the Los Angeles County Office of the District Attorney ("LADA").

On May 20, 2024, the LADA extended the response to your PRA request to June 3, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

Your request asks for the following:

1. All emails sent by Diana Teran using her official lacounty.gov email from April 25, 2024 to present.

Please be advised that pursuant to Government Code section 7922.535 subdivision (b), the time to respond to your request must be extended by an additional fourteen (14) days due to the existence of unusual circumstances. The unusual circumstances include the need to search for, collect, and appropriately review potentially responsive records. Counsel estimates that it will be able to provide you with a further response by June 17, 2024.

June 3, 2024

Page 2

In providing you with this response, the County of Los Angeles and the LADA do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By

A handwritten signature in black ink, appearing to read 'AS', with a long horizontal stroke extending to the right.

ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:lr

EXHIBIT “E”

County of Los Angeles

June 17, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request

Dear Mr. Shinee:

This letter from the Los Angeles County Office of the County Counsel ("Counsel") responds to a request you made dated May 8, 2024 for certain records sent to the Los Angeles County Office of the District Attorney ("LADA").

On May 20, 2024, Counsel drafted a response to your PRA request extending the response date to June 3, 2024, pursuant to California Government Code section 7922.535 subdivision (b). On May 21, 2024, this response letter was inadvertently emailed to an erroneous email address: GRSA2017@gmail.com.

On June 3, 2024, the Counsel extended the response to your PRA request to June 17, 2024, so that the LADA and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

1. All emails sent by Diana Teran using her official lacounty.gov email from April 25, 2024 to present.


Please be advised that the LADA and Counsel continue to search for, collect, and appropriately review potentially responsive records. Counsel anticipates that it will be able to provide you with a further response by July 10, 2024.

Richard A. Shinee
June 17, 2024
Page 2

In providing you with this response, the County of Los Angeles, Counsel, and the LADA do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By 
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:lr

EXHIBIT “F”

County of Los Angeles

July 16, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, CA 91602
GSRAS2017@gmail.com

Re: Public Records Act Request

Dear Mr. Shinee:

This letter from the Los Angeles County Office of the County Counsel ("Counsel") responds to a request you made dated May 8, 2024, for certain records sent to the Los Angeles County Office of the District Attorney ("LADA").

On May 20, 2024, Counsel drafted a response to your Public Records Act request extending the response date to June 3, 2024, pursuant to California Government Code section 7922.535 subdivision (b). On May 21, 2024, this response letter was inadvertently emailed to an erroneous email address of GSRA2017@gmail.com instead of the correct email address of GSRAS2017@gmail.com.

On June 3 and June 17 of 2024, the Counsel extended the response to your PRA request so that the LADA and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

1. All emails sent by Diana Teran using her official lacounty.gov email from April 25, 2024 to present.

Please be advised that the LADA and Counsel continue to search for, collect, and appropriately review potentially responsive records.

Richard A. Shinee
July 16, 2024
Page 2

Counsel anticipates that it will be able to provide you with a further response by August 8, 2024.

In providing you with this response, the County of Los Angeles, Counsel, and the LADA do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel

A handwritten signature in black ink, appearing to read 'AS', with a long horizontal stroke extending to the right.

By
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “G”

County of Los Angeles

Dawyn R. Harrison
County Counsel



August 8, 2024

VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 8, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County Office of the County Counsel ("Counsel") responds to a request you made dated May 8, 2024, for certain records sent to the Los Angeles County District Attorney's Office ("LADA").

On May 20, 2024, Counsel drafted a response to your Public Records Act ("PRA") request extending the response date to June 3, 2024, pursuant to California Government Code Section 7922.535 subdivision (b). On May 21, 2024, this response letter was inadvertently emailed to an erroneous email address of GSRA2017@gmail.com instead of the correct email address of GSRAS2017@gmail.com.

On June 3, June 17, and July 16, 2024, Counsel extended the response to your PRA request, so that the LADA and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

This letter from Counsel shall serve as response on behalf of the County.

REQUEST:

Your request asks for the following:

1. All emails sent by Diana Teran using her official lacounty.gov email from April 25, 2024 to present.

RESPONSE:

In Response to Request No. 1, the County provides the accompanying disclosable responsive records.

Richard A. Shinee
August 8, 2024
Page 2

Please note that the County has withheld and/or redacted records as some of the requested records and information are exempt from disclosure under the California Public Records Act for reasons including, but not limited to, attorney work product exemptions, attorney-client privilege exemptions, ongoing litigation exemptions, the Deliberative Process exemptions, Personnel Records exemptions, and the public interest served by not making the records public clearly outweighs the public interest served by disclosure of the records. (See Code of Civ. Proc., § 2018.030; Gov. Code, §§ 7927.200, 7927.700, and 7927.705; *Fairley v. Superior Court* (1998) 66 Cal.App.4th 1414; *Times Mirror Co. v. Superior Court* (1991) 53 Cal.3d 1325).

Additionally, the County has withheld and/or redacted records as some of the records and information are exempt from disclosure as they are part of criminal investigations. (See Gov. Code, §§ 7923.600, and 7923.615; Evid. Code, §1040; and see also *Williams v. Superior Court* (1993) 5 Cal.4th 337).

Further, in providing you with this response, the County of Los Angeles and the LADA do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

This letter concludes our response to your request dated May 8, 2024. Thank you for your time and attention with this matter.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By 
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

APPROVED AND RELEASED:



NICOLE DAVIS TINKHAM
Chief Deputy

AS:pec

Attachments

EXHIBIT “H”

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 9, 2024

Via Email & US mail
PIO@ceo.lacounty.gov

Custodian of Records
County of Los Angeles
211 W. Temple Street, Suite 1200
Los Angeles, CA 90012

Re: California Public Records Act Request for Records

Dear Ladies and Gentlemen:

This letter is a request to obtain records in possession of the County of Los Angeles 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:

All emails sent to Diana Teran at her official lacounty.gov email from April 25, 2024 to present.

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 emails as well as any attachments thereto, in any form.

To make this request more manageable and easy for the County of Los Angeles 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.

Page 2

Green & Shinee

May 9, 2024

To: County of Los Angeles
Custodian of Records

Re: CPRA Request

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 County of Los Angeles, 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
General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

EXHIBIT “I”

California Public Records Act Request for Records

Office of Countywide Communications <pio@ceo.lacounty.gov>
To: Richard Shinee <gsras2017@gmail.com>

Fri, May 10, 2024 at 3:37 PM

Good afternoon,

Thank you for your email. We forwarded it to the District Attorney's office. If you'd like to follow up with them, you may contact them at pra@da.lacounty.gov.

Thank you,

Office of Countywide Communications

Los Angeles County Chief Executive Office

For general information: Call (213) 974-1234 - Available 24/7

For media inquiries and Public Records Act requests: Call (213) 974-1311



Find more information in the Guide to County Services - a directory that quickly connects you with County services.



From: Richard Shinee <gsras2017@gmail.com>
Sent: Thursday, May 9, 2024 5:01 PM
To: Office of Countywide Communications <pio@ceo.lacounty.gov>
Subject: California Public Records Act Request for Records

CAUTION: External Email. Proceed Responsibly.

[Quoted text hidden]

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

May 9, 2024

Via Email & US mail
PRA@da.lacounty.gov

Custodian of Records
Los Angeles County District Attorney's Office
211 W. Temple Street, Suite 1200
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Re: California Public Records Act Request for Records

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The records I am requesting are:

All emails sent to Diana Teran at her official lacounty.gov email from April 25, 2024 to present.

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 emails as well as any attachments thereto, in any form.

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.

Page 2

Green & Shinee

May 9, 2024

To: Custodian of Records

Deputy District Attorney/Custodian of Records

Re: CPRA Request

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

General Counsel to Association of

Deputy District Attorneys for

Los Angeles County

EXHIBIT “K”

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 10, 2024

Via Email & US mail
PIO@ceo.lacounty.gov

Custodian of Records
County of Los Angeles
211 W. Temple Street, Suite 1200
Los Angeles, CA 90012

Re: California Public Records Act Request for Records

Dear Ladies and Gentlemen:

This letter is a request to obtain records in possession of the County of Los Angeles 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. Any and all documents showing Diana Teran's current employment status with the District of Attorney's Office;**
- 2. Any all documents reflecting Diana Teran's current pay status;**
- 3. Any and all documents reflecting a change in Diana Teran's work assignment after April 23, 2024.**

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 emails as well as any attachments thereto, in any form.

Page 2

Green & Shinee

May 10, 2024

To: County of Los Angeles
Custodian of Records

Re: CPRA Request

To make this request more manageable and easy for the County of Los Angeles 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.

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 County of Los Angeles, 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

May 10, 2024

To: County of Los Angeles
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
General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County
21L-039\DLDAO240510.plm

EXHIBIT “L”

County of Los Angeles

June 3, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request of May 10, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County Office of the County Counsel ("Counsel") responds your request made on May 10, 2024 for certain records sent to the County of Los Angeles ("County").

On May 20, 2024, Counsel extended the response to your PRA request to June 3, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

Your request asks for the following:

1. Any and all documents showing Diana Teran's current employment status with the County of Los Angeles,
2. Any all documents reflecting Diana Teran's current pay status,
3. Any and all documents reflecting a change in Diana Teran's work assignment after April 23, 2024.

Please be advised that pursuant to Government Code section 7922.535 subdivision (b), the time to respond to your request must be extended by an additional fourteen (14) days due to the existence of unusual circumstances. The unusual circumstances include the need to search for, collect, and appropriately review potentially responsive records. Counsel estimates that it will be able to provide you with a further response by June 17, 2024.

June 3, 2024

Page 2

In providing you with this response, the County does not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By 

ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:lr

EXHIBIT “M”

County of Los Angeles

June 17, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 10, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County Office of the County Counsel ("Counsel") responds to a request you made dated May 10, 2024, for certain records sent to the County of Los Angeles ("County").

On May 21, 2024, Counsel extended the response to your California Public Records Act ("CPRA") request to June 3, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

On June 3, 2024, Counsel extended the response to your CPRA request to June 17, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

This letter from the Office of the County Counsel, County of Los Angeles ("Counsel") shall serve as a response on behalf of the County.

REQUEST:

Your request asks for copies of the following:

1. Any and all documents showing Diana Teran's current employment status with the County of Los Angeles,
2. Any all documents reflecting Diana Teran's current pay status,
3. Any and all documents reflecting a change in Diana Teran's work assignment after April 23, 2024.

RESPONSE:

In Response to Request Nos. 1, 2 and 3 the County completed a diligent search for records responsive to your request and provides:

- eHR1 and
- PAY-ODVOE – Verification of Employment Diana Teran.

Please note that the County has withheld and/or redacted records as some of the requested records and information are exempt from disclosure under the CPRA for reasons including, but not limited to, the Personnel Records exemption and the public interest served by not making the record public clearly outweighs the public interest served by disclosure of the record. (See Gov. Code, § 7927.700; 7922.000 and *Times Mirror Co. v. Superior Court* (1991) 53 Cal.3d 1325).

In providing you with this response, the County does not waive any rights, defenses, claims of privilege or claims of exemption of any record under the CPRA or any other statutes.

This letter concludes our response to your request dated May 10, 2024. Thank you for your time and attention with this matter.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By 
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

APPROVED AND RELEASED:


NICOLE DAVIS TINKHAM
Chief Deputy

AS:pec

Attachments

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

May 10, 2024

Via Email & US mail
PIO@ceo.lacounty.gov

Custodian of Records
County of Los Angeles
211 W. Temple Street, Suite 1200
Los Angeles, CA 90012

Re: California Public Records Act Request for Records

Dear Ladies and Gentlemen:

This letter is a request to obtain records in possession of the County of Los Angeles 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. Any and all documents showing Diana Teran's current employment status with the District of Attorney's Office;**
- 2. Any all documents reflecting Diana Teran's current pay status;**
- 3. Any and all documents reflecting a change in Diana Teran's work assignment after April 23, 2024.**

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 emails as well as any attachments thereto, in any form.

Page 2

Green & Shinee

May 10, 2024

To: County of Los Angeles
Custodian of Records

Re: CPRA Request

To make this request more manageable and easy for the County of Los Angeles 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.

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 County of Los Angeles, 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

May 10, 2024

To: County of Los Angeles
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
General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County
21L-039\DLDAO240510.plm



Richard Shinee <gsras2017@gmail.com>

May 10, 2024 California Public Records Act Request for Records

Richard Shinee <gsras2017@gmail.com>
To: LA DAO Public Records Act <pra@da.lacounty.gov>

Fri, May 10, 2024 at 4:39 PM



Dear Ladies and Gentlemen:

Attached please find the May 10, 2024 public records act request letter from Richard A. Shinee, Esq., requesting copies of all documents reflecting the current employment and pay status of Diana Teran after April 23, 2024.

Very truly yours,

Peggy Madsen on behalf of
RICHARD A. SHINEE, ESQ.

GREEN & SHINEE, A P.C.

11333 Moorpark Street
Suite 387
Studio City, CA 91602
Phone: (818) 266-1773



20240510 RAShinee CPRA request to DAO Re Diana Teran Pay Status After 20240423.pdf
151K

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

May 13, 2024

Via Email & US mail
PIO@ceo.lacounty.gov

Custodian of Records
County of Los Angeles
211 W. Temple Street, Suite 1200
Los Angeles, CA 90012

Re: California Public Records Act Request for Records

Dear Ladies and Gentlemen:

This letter is a request to obtain records in possession of the County of Los Angeles 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. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's utilization, access to and suspension from access to the following systems occurred:**

PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system
- 2. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's editing capabilities for the following systems occurred:**

Page 2

Green & Shinee

May 13, 2024

To: County of Los Angeles
Custodian of Records

Re: CPRA Request

PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system

- 3. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's passwords for access to the following systems were disabled or suspended:**

PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system

- 4. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's County and/or District Attorney's Office laptop was surrendered, seized, or disabled.**
- 5. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's County and/or District Attorney's Office cell phone was surrendered, seized, or disabled.**

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 emails as well as any attachments thereto, in any form.

To make this request more manageable and easy for the County of Los Angeles 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

Page 3

Green & Shinee

May 13, 2024

To: County of Los Angeles
Custodian of Records

Re: CPRA Request

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 County of Los Angeles, 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
General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County
21L-039\DLCOLA240513.plm

EXHIBIT “P”

County of Los Angeles

June 6, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, CA 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Received on May 13, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County Office of the County Counsel ("Counsel") responds to a request you made dated May 13, 2024, for certain records addressed to Custodian of Records, County of Los Angeles ("County").

On May 23, 2024, Counsel extended the response to your Public Records Act request to June 6, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

Your request asks for the following:

1. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's utilization, access to and suspension from access to the following systems occurred: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system
2. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's editing capabilities for the following systems occurred: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system
3. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from

April 25, 2024 to the present, reflecting the date and time that Diana Teran's passwords for access to the following systems were disabled or suspended: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system

4. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's County and/or District Attorney's Office laptop was surrendered, seized, or disabled.
5. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's County and/or District Attorney's Office cell phone was surrendered, seized, or disabled.

Please be advised that pursuant to Government Code section 7922.535 subdivision (b), the time to respond to your request must be extended by an additional fourteen (14) days due to the existence of unusual circumstances. The unusual circumstances include the need to search for, collect, and appropriately review potentially responsive records. Counsel estimates that it will be able to provide you with a further response by June 20, 2024.

In providing you with this response, the County of Los Angeles does not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel



By
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “Q”

County of Los Angeles

June 20, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 13, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County Office of the County Counsel ("Counsel") responds to a request you made dated May 13, 2024, for certain records addressed to Custodian of Records, County of Los Angeles ("County").

On May 23, 2024, Counsel extended the response to your Public Records Act ("PRA") request to June 6, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

On June 6, 2024, the Counsel extended the response to your PRA request to June 20, 2024, so that the County and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

1. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's utilization, access to and suspension from access to the following systems occurred: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system
2. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's editing capabilities for the following systems occurred: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system


3. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's passwords for access to the following systems were disabled or suspended: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system
4. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's County and/or District Attorney's Office laptop was surrendered, seized, or disabled.
5. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's County and/or District Attorney's Office cell phone was surrendered, seized, or disabled.

Please be advised that the County and Counsel continue to search for, collect, and appropriately review potentially responsive records. Counsel anticipates that it will be able to provide you with a further response by July 22, 2024.

In providing you with this response, the County of Los Angeles does not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

Dawyn R. Harrison
County Counsel

By 
Adam Sexton
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “R”

County of Los Angeles

July 22, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 13, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County Office of the County Counsel ("Counsel") responds to a request you made dated May 13, 2024, for certain records addressed to Custodian of Records, County of Los Angeles ("County").

On May 23, 2024, Counsel extended the response to your Public Records Act request to June 6, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

On June 6 and June 20 of 2024, Counsel extended the response to your PRA request so that the County and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

1. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's utilization, access to and suspension from access to the following systems occurred: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system
2. Any and all emails by and between any employee of the District Attorney's Office and/or documentation

from April 25, 2024 to the present, reflecting the date and time that Diana Teran's editing capabilities for the following systems occurred: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system

3. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's passwords for access to the following systems were disabled or suspended: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system
4. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's County and/or District Attorney's Office laptop was surrendered, seized, or disabled.
5. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's County and/or District Attorney's Office cell phone was surrendered, seized, or disabled.

Please be advised that the County and Counsel continue to search for, collect, and appropriately review potentially responsive records. Counsel anticipates that it will be able to provide you with a further response by August 22, 2024.

In providing you with this response, the County of Los Angeles does not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By 

ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “S”

County of Los Angeles

August 22, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 13, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County Office of the County Counsel ("Counsel") responds to a request you made dated May 13, 2024, for certain records addressed to Custodian of Records, County of Los Angeles ("County").

On May 23, 2024, Counsel extended the response to your Public Records Act ("PRA") request to June 6, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

On June 6, June 20, and July 22 of 2024, Counsel extended the response to your PRA request so that the County and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

1. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's utilization, access to and suspension from access to the following systems occurred: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system
2. Any and all emails by and between any employee of the District Attorney's Office and/or documentation

from April 25, 2024 to the present, reflecting the date and time that Diana Teran's editing capabilities for the following systems occurred: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system

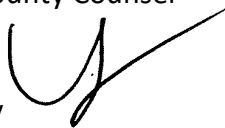
3. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's passwords for access to the following systems were disabled or suspended: PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system
4. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's County and/or District Attorney's Office laptop was surrendered, seized, or disabled.
5. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's County and/or District Attorney's Office cell phone was surrendered, seized, or disabled.

Please be advised that the County and Counsel continue to search for, collect, and appropriately review potentially responsive records. Counsel anticipates that it will be able to provide you with a further response by September 24, 2024.

In providing you with this response, the County of Los Angeles does not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By 

ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “T”

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 13, 2024

Via Email & US mail
PRA@da.lacounty.gov

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 Ladies and Gentlemen:

This letter is a request to obtain records in possession of the County of Los Angeles 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. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's utilization, access to and suspension from access to the following systems occurred:**

PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system
- 2. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's editing capabilities for the following systems occurred:**

May 13, 2024

To: Los Angeles County District Attorney's Office
Custodian of Records

Re: CPRA Request

PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system

- 3. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's passwords for access to the following systems were disabled or suspended:**

PIMS, CLETS, CCHRS, DCU, SID Tracker, ORWITS, Brady, CPS, any SharePoint site, internal County email system

- 4. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's County and/or District Attorney's Office laptop was surrendered, seized, or disabled.**
- 5. Any and all emails by and between any employee of the District Attorney's Office and/or documentation from April 25, 2024 to the present, reflecting the date and time that Diana Teran's County and/or District Attorney's Office cell phone was surrendered, seized, or disabled.**

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 emails as well as any attachments thereto, in any form.

To make this request more manageable and easy for the County of Los Angeles 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

Page 3

Green & Shinee

May 13, 2024

To: Los Angeles County District Attorney's Office
Custodian of Records

Re: CPRA Request

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 County of Los Angeles, 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

General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County
21L-039\DLDAO240513.plm

EXHIBIT “U”

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 14, 2024

Via Email & US mail
PIO@ceo.lacounty.gov

Custodian of Records
County of Los Angeles
211 W. Temple Street, Suite 1200
Los Angeles, CA 90012

Re: California Public Records Act Request for Records

Dear Ladies and Gentlemen:

This letter is a request to obtain records in possession of the County of Los Angeles 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. Any and all emails or other forms of communication by and between Diane Teran and the following individuals for the period between January 26, 2024 and the present with regard to People v. Rebecca Grossman:**

Garrett Dameron, Ryan Gould, Jamie Castro, Cynthia Nakao, Stephanie Mire, James Garrison, Joseph Iniguez, and George Gascon.

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 emails as well as any attachments thereto, in any form.

Page 2

Green & Shinee

May 14, 2024

To: County of Los Angeles
Custodian of Records

Re: CPRA Request

To make this request more manageable and easy for the County of Los Angeles 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.

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 County of Los Angeles, 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

May 14, 2024

To: County of Los Angeles
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
General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County
21L-039DLCOLA240514.plm

EXHIBIT “V”

May 14, 2024 California Public Records Act Request for Records

Office of Countywide Communications <pio@ceo.lacounty.gov>
To: Richard Shinee <gsras2017@gmail.com>

Wed, May 15, 2024 at 12:53 PM

Hello,

Your PRA request has been forwarded over to the appropriate department for handling.

Thank you,

Office of Countywide Communications

Los Angeles County Chief Executive Office

For general information: Call (213) 974-1234 - Available 24/7**For media inquiries and Public Records Act requests: Call (213) 974-1311**

Find more information in the [Guide to County Services](#) - a directory that quickly connects you with County services.



From: Richard Shinee <gsras2017@gmail.com>
Sent: Tuesday, May 14, 2024 4:53 PM
To: Office of Countywide Communications <pio@ceo.lacounty.gov>
Subject: May 14, 2024 California Public Records Act Request for Records

CAUTION: External Email. Proceed Responsibly.

[Quoted text hidden]

EXHIBIT “W”

County of Los Angeles

June 7, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 14, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County, Office of the County Counsel ("Counsel") responds to a request you made dated May 14, 2024, for certain records addressed to the Custodian of Records, County of Los Angeles ("County").

On May 24, 2024, Counsel extended the response to your PRA request to June 7, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

Your request asks for the following:

1. Any and all emails or other forms of communication by and between Diane Teran and the following individuals for the period between January 26, 2024 and the present with regard to People v. Rebecca Grossman: Garrett Dameron, Ryan Gould, Jamie Castro, Cynthia Nakao, Stephanie Mire, James Garrison, Joseph Iniguez, and George Gascon.

Please be advised that pursuant to Government Code section 7922.535 subdivision (b), the time to respond to your request must be extended by an additional fourteen (14) days due to the existence of unusual circumstances. The unusual circumstances include the need to search for, collect, and appropriately review potentially responsive

Richard A. Shinee
June 7, 2024
Page 2

records. Counsel estimates that it will be able to provide you with a further response by June 21, 2024.

In providing you with this response, the County of Los Angeles and the DA do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel

A handwritten signature in black ink, appearing to read 'AS', with a long horizontal stroke extending to the right.

By
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “X”

County of Los Angeles

June 21, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request dated May 14, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County, Office of the County Counsel ("Counsel") responds to a request you made dated May 14, 2024, for certain records addressed to the Custodian of Records, County of Los Angeles ("County").

On May 24, 2024, Counsel extended the response to your Public Records Act ("PRA") request to June 7, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

On June 7, 2024, the Counsel extended the response to your PRA request to June 21, 2024, so that the County and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

1. Any and all emails or other forms of communication by and between Diane Teran and the following individuals for the period between January 26, 2024 and the present with regard to People v. Rebecca Grossman: Garrett Dameron, Ryan Gould, Jamie Castro, Cynthia Nakao, Stephanie Mire, James Garrison, Joseph Iniguez, and George Gascon.

Please be advised that the County and Counsel continue to search for, collect, and appropriately review potentially responsive records.

Richard A. Shinee
June 21, 2024
Page 2

Counsel anticipates that it will be able to provide you with a further response by July 23, 2024.

In providing you with this response, the County of Los Angeles and the DA do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

Dawyn R. Harrison
County Counsel

A handwritten signature in black ink, appearing to be 'AS', with a long horizontal stroke extending to the right.

By
Adam Sexton
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “Y”

County of Los Angeles

July 23, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request

Dear Mr. Shinee:

This letter from the Los Angeles County, Office of the County Counsel ("Counsel") responds to a request you made dated May 14, 2024, for certain records addressed to the Custodian of Records, County of Los Angeles ("County").

On May 24, 2024, Counsel extended the response to your Public Records Act request to June 7, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

On June 7 and June 21 of 2024, Counsel extended the response to your PRA request so that the County and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

1. Any and all emails or other forms of communication by and between Diane Teran and the following individuals for the period between January 26, 2024 and the present with regard to People v. Rebecca Grossman: Garrett Dameron, Ryan Gould, Jamie Castro, Cynthia Nakao, Stephanie Mire, James Garrison, Joseph Iniguez, and George Gascon.

Please be advised that the County and Counsel continue to search for, collect, and appropriately review potentially responsive records.

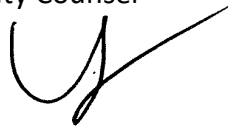
Richard A. Shinee
July 23, 2024
Page 2

Counsel anticipates that it will be able to provide you with a further response by August 23, 2024.

In providing you with this response, the County of Los Angeles and the Los Angeles County Office of the District Attorney do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel

A handwritten signature in black ink, appearing to read 'AS', with a long horizontal stroke extending to the right.

By
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “Z”

County of Los Angeles

August 23, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 14, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County, Office of the County Counsel ("Counsel") responds to a request you made dated May 14, 2024, for certain records addressed to the Custodian of Records, County of Los Angeles ("County").

On May 24, 2024, Counsel extended the response to your Public Records Act ("PRA") request to June 7, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

On June 7, June 21, and July 23 of 2024, Counsel extended the response to your PRA request so that the County and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

1. Any and all emails or other forms of communication by and between Diane Teran and the following individuals for the period between January 26, 2024 and the present with regard to People v. Rebecca Grossman: Garrett Dameron, Ryan Gould, Jamie Castro, Cynthia Nakao, Stephanie Mire, James Garrison, Joseph Iniguez, and George Gascon.

Please be advised that the County and Counsel continue to search for, collect, and appropriately review potentially responsive records.

Richard A. Shinee
August 23, 2024
Page 2

Counsel anticipates that it will be able to provide you with a further response by September 25, 2024.

In providing you with this response, the County of Los Angeles and the Los Angeles County Office of the District Attorney do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel

A handwritten signature in black ink, appearing to read 'AS', is written over the printed name of Adam Sexton.

By
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “AA”

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 14, 2024

Via Email & US mail
PRA@da.lacounty.gov

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 Ladies and Gentlemen:

This letter is a request to obtain records in possession of the County of 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:

- Any and all emails or other forms of communication by and between Diane Teran and the following individuals for the period between January 26, 2024 and the present with regard to People v. Rebecca Grossman:**

Garrett Dameron, Ryan Gould, Jamie Castro, Cynthia Nakao, Stephanie Mire, James Garrison, Joseph Iniguez, and George Gascon.

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 emails as well as any attachments thereto, in any form.

Page 2

Green & Shinee

May 14, 2024

To: Los Angeles County District Attorney's Office
Custodian of Records

Re: CPRA Request

To make this request more manageable and easy for the District Attorney's Office 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.

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 County of Los Angeles, 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

May 14, 2024

To: Los Angeles County District Attorney's Office
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
General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County
21L-039/DLDAO240514.plm

EXHIBIT “BB”

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 15, 2024

Via Email & US mail
PIO@ceo.lacounty.gov

Custodian of Records
County of Los Angeles
211 W. Temple Street, Suite 1200
Los Angeles, CA 90012

Re: California Public Records Act Request for Records

Dear Ladies and Gentlemen:

This letter is a request to obtain records in possession of the County of Los Angeles 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 any and all documentation reflecting the total number of days teleworked between April 1, 2023 and April 30, 2024 for each of the following persons:

1. Joseph Iniguez
2. Tiffany Blacknell
3. Diana Teran
4. Shelan Joseph
5. Ron Geltz
6. Marc Beart
7. Stephanie Mire
8. Laura Jane Kesner
9. Larry Droeger
10. James Garrison
11. Priscilla Musso

Page 2

Green & Shinee

May 15, 2024

To: County of Los Angeles
Custodian of Records

Re: CPRA Request

12. Arisa Mattson
13. Navjot Kaur
14. Gregory Apt
15. Nancy Theberge
16. Kimberly Toney
17. John Perroni III
18. Robert Conley
19. Parag Agrawal

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 emails as well as any attachments thereto, in any form.

To make this request more manageable and easy for the County of Los Angeles 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

May 15, 2024

To: County of Los Angeles
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 County of Los Angeles, 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
General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County
21L-039\DLCOLA240515.plm

EXHIBIT “CC”

County of Los Angeles

June 11, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 14, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County, Office of the County Counsel ("Counsel") responds to a request you made dated May 14, 2024, for certain records addressed to the Custodian of Records, County of Los Angeles ("County").

On May 28, 2024, Counsel extended the response to your Public Records Act request to June 11, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

Your request asks for the following:

...any and all documentation reflecting the total number of days teleworked between April 1, 2023 and April 30, 2024 for each of the following persons:

1. Joseph Iniguez
2. Tiffany Blacknell
3. Diana Teran
4. Shelan Joseph
5. Ron Geltz
6. Marc Beart
7. Stephanie Mire
8. Laura Jane Kesner
9. Larry Droeger
10. James Garrison
11. Priscilla Musso
12. Arisa Mattson

Richard A. Shinee
June 11, 2024
Page 2

13. Navjot Kaur
14. Gregory Apt
15. Nancy Theberge
16. Kimberly Toney
17. John Perroni III
18. Robert Conley
19. Parag Agrawal

Please be advised that pursuant to Government Code section 7922.535 subdivision (b), the time to respond to your request must be extended by an additional fourteen (14) days due to the existence of unusual circumstances. The unusual circumstances include the need to search for, collect, and appropriately review potentially responsive records. Counsel estimates that it will be able to provide you with a further response by June 25, 2024.

In providing you with this response, the County of Los Angeles and the Los Angeles County Office of the District Attorney do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By 
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “DD”

County of Los Angeles

June 25, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request dated May 14, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County, Office of the County Counsel ("Counsel") responds to a request you made dated May 14, 2024, for certain records addressed to the Custodian of Records, County of Los Angeles ("County").

On May 28, 2024, Counsel extended the response to your Public Records Act ("PRA") request to June 11, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

On June 11, 2024, the Counsel extended the response to your PRA request to June 25, 2024, so that the County and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

...any and all documentation reflecting the total number of days teleworked between April 1, 2023 and April 30, 2024 for each of the following persons:

1. Joseph Iniguez
2. Tiffany Blacknell
3. Diana Teran
4. Shelan Joseph
5. Ron Geltz
6. Marc Beart
7. Stephanie Mire

Richard A. Shinee
June 25, 2024
Page 2


8. Laura Jane Kesner
9. Larry Droeger
10. James Garrison
11. Priscilla Musso
12. Arisa Mattson
13. Navjot Kaur
14. Gregory Apt
15. Nancy Theberge
16. Kimberly Toney
17. John Perroni III
18. Robert Conley
19. Parag Agrawal

Please be advised that the County and Counsel continue to search for, collect, and appropriately review potentially responsive records. Counsel anticipates that it will be able to provide you with a further response by July 25, 2024.

In providing you with this response, the County of Los Angeles and the Los Angeles County Office of the District Attorney do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

Dawyn R. Harrison
County Counsel

By 
Adam Sexton
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “EE”

County of Los Angeles

July 25, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated

Dear Mr. Shinee:

This letter from the Los Angeles County, Office of the County Counsel ("Counsel") responds to a request you made dated May 14, 2024, for certain records addressed to the Custodian of Records, County of Los Angeles ("County").

On May 28, 2024, Counsel extended the response to your Public Records Act request to June 11, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

On June 11 and June 25 of 2024, Counsel extended the response to your PRA request so that the County and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

...any and all documentation reflecting the total number of days teleworked between April 1, 2023 and April 30, 2024 for each of the following persons:

1. Joseph Iniguez
2. Tiffany Blacknell
3. Diana Teran
4. Shelan Joseph
5. Ron Geltz
6. Marc Beart
7. Stephanie Mire

Richard A. Shinee
July 25, 2024
Page 2

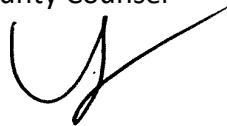
8. Laura Jane Kesner
9. Larry Droeger
10. James Garrison
11. Priscilla Musso
12. Arisa Mattson
13. Navjot Kaur
14. Gregory Apt
15. Nancy Theberge
16. Kimberly Toney
17. John Perroni III
18. Robert Conley
19. Parag Agrawal

Please be advised that the County and Counsel continue to search for, collect, and appropriately review potentially responsive records. Counsel anticipates that it will be able to provide you with a further response by August 25, 2024.

In providing you with this response, the County of Los Angeles and the Los Angeles County Office of the District Attorney do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel



By
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “FF”



County of Los Angeles

August 23, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 14, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County, Office of the County Counsel ("Counsel") responds to a request you made dated May 14, 2024, for certain records addressed to the Custodian of Records, County of Los Angeles ("County").

On May 28, 2024, Counsel extended the response to your Public Records Act ("PRA") request to June 11, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

On June 11, June 25, and July 25 of 2024, Counsel extended the response to your PRA request so that the County and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

...any and all documentation reflecting the total number of days teleworked between April 1, 2023 and April 30, 2024 for each of the following persons:

1. Joseph Iniguez
2. Tiffany Blacknell
3. Diana Teran
4. Shelan Joseph
5. Ron Geltz
6. Marc Beart
7. Stephanie Mire

Richard A. Shinee
August 23, 2024
Page 2

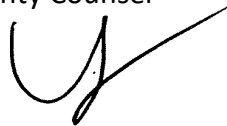
8. Laura Jane Kesner
9. Larry Droeger
10. James Garrison
11. Priscilla Musso
12. Arisa Mattson
13. Navjot Kaur
14. Gregory Apt
15. Nancy Theberge
16. Kimberly Toney
17. John Perroni III
18. Robert Conley
19. Parag Agrawal

Please be advised that the County and Counsel continue to search for, collect, and appropriately review potentially responsive records. Counsel anticipates that it will be able to provide you with a further response by September 25, 2024.

In providing you with this response, the County of Los Angeles and the Los Angeles County Office of the District Attorney do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel



By
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “GG”

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 15, 2024

Via Email & US mail
PRA@da.lacounty.gov

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 Ladies and Gentlemen:

This letter is a request to obtain records in possession of the County of 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 any and all documentation reflecting the total number of days teleworked between April 1, 2023 and April 30, 2024 for each of the following persons:

1. Joseph Iniguez
2. Tiffany Blacknell
3. Diana Teran
4. Shelan Joseph
5. Ron Geltz
6. Marc Beart
7. Stephanie Mire
8. Laura Jane Kesner
9. Larry Droeger
10. James Garrison
11. Priscilla Musso
12. Arisa Mattson
13. Navjot Kaur

Page 2

Green & Shinee

May 15, 2024

To: Los Angeles County District Attorney's Office
Custodian of Records

Re: CPRA Request

14. Gregory Apt
15. Nancy Theberge
16. Kimberly Toney
17. John Perroni III
18. Robert Conley
19. Parag Agrawal

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 emails as well as any attachments thereto, in any form.

To make this request more manageable and easy for the District Attorney's Office 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

May 15, 2024

To: Los Angeles County District Attorney's Office
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 County of Los Angeles, 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
General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County
21L-039\DLDAO240515.plm

EXHIBIT “HH”



LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE ETHICS & INTEGRITY OPERATIONS

GEORGE GASCÓN • District Attorney
JOSEPH F. INIGUEZ • Chief Deputy District Attorney
JAMES W. GARRISON • Assistant District Attorney

VIA ELECTRONIC MAIL

GSRAS2017@gmail.com

May 28, 2024

Dear Mr. Shinee:

CALIFORNIA PUBLIC RECORDS ACT REQUEST

PRA # 2024-0515-2058

We have reviewed your Public Records Act request, concerning the total number of days teleworked between April 1, 2023, and April 30, 2024. It was received by our office on May 15, 2024.

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 [insert applicable reason described in § 7922.535, subdivisions (c)(1) – (4)].

We will respond on or before June 11, 2024.

Very truly yours,

GEORGE GASCÓN
District Attorney

By /s/ Kathryn Albracht
KATHRYN ALBRACHT
Special Assistant Deputy District Attorney

df

Hall of Justice
211 West Temple Street, Suite 1200
Los Angeles, CA 90012
(213) 974-3500

EXHIBIT “II”



LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE ETHICS & INTEGRITY OPERATIONS

GEORGE GASCÓN • District Attorney
JOSEPH F. INIGUEZ • Chief Deputy District Attorney
JAMES W. GARRISON • Assistant District Attorney

VIA ELECTRONIC MAIL

GSRAS2017@gmail.com

June 6, 2024

Dear Mr. Shinee:

REVISED: CALIFORNIA PUBLIC RECORDS ACT REQUEST
PRA# 2024-0515-2058

We have reviewed your Public Records Act request, concerning “Telework Schedule for: Tiffany Blacknell; Joseph Iniguez; Diana Teran; Shelan Joseph; Ron Geltz; Marc Beaart; Stephanie mire; Laura Jane Kesner; Larry Droeger; James Garrison; Priscilla Musso; Arisa Mattson; Navjot Kaur; Gregory Apt; Nancy Theberge; Kimberly Toney; John Perroni III; Robert Conley; and Parag Agrawal”

Your PRA request was received by our office on May 15, 2024.

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.

We will respond on or before June 11, 2024.

Very truly yours,

GEORGE GASCÓN
District Attorney

By /s/ *Denise M. Fox*

DENISE M. FOX
Litigation Coordinator

Hall of Justice
211 West Temple Street, Suite 1200
Los Angeles, CA 90012
(213) 974-3500

EXHIBIT “JJ”



LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE

ETHICS & INTEGRITY OPERATIONS

GEORGE GASCÓN • District Attorney
JOSEPH F. INIGUEZ • Chief Deputy District Attorney
JAMES W. GARRISON • Assistant District Attorney

VIA ELECTRONIC MAIL

GSRAS2017@gmail.com

June 11, 2024

Dear Mr. Shinee:

CALIFORNIA PUBLIC RECORDS ACT REQUEST

PRA# 2024-0515-2058

We have reviewed your Public Records Act request, concerning “THE RECORDS I AM REQUESTING ARE ANY AND ALL DOCUMENTATION REFLECTING THE TOTAL NUMBER OF DAYS TELEWORKED BETWEEN APRIL 1, 2023 AND APRIL 30, 2024 FOR EACH OF THE FOLLOWING PERSONS: Joseph Iniguez; Tiffany Blacknell; Diana Teran; Shelan Joseph; Ron Geltz; Marc Beart; Stephanie Mire; Laura Jane Kessner; Larry Droeger; James Garrison; Priscilla Musso; Arisa Mattson; Navjot Kaur; Gregory Apt; Nancy Theberge; Kimberly Toney; John Perroni III; Robert Conley; Parag Agrawal”

Your PRA request was received by our office on May 15, 2024.

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.

We will respond on or before June 25, 2024.

Very truly yours,

GEORGE GASCÓN
District Attorney

By /s/ *Denise M. Fox*

DENISE M. FOX
Litigation Coordinator

Hall of Justice
211 West Temple Street, Suite 1200
Los Angeles, CA 90012
(213) 974-3500

EXHIBIT “KK”

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 16, 2024

Via Email & US mail
PIO@ceo.lacounty.gov

Custodian of Records
County of Los Angeles
211 W. Temple Street, Suite 1200
Los Angeles, CA 90012

Re: California Public Records Act Request for Records

Dear Ladies and Gentlemen:

This letter is a request to obtain records in possession of the County of Los Angeles 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 copies of all Annual Policy Review Acknowledgment Forms signed by Diana Teran for the duration of the time she was employed by the County of Los Angeles in any capacity, and any document or communication referring to Diana Teran's annual review of County of Los Angeles policies.

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 emails as well as any attachments thereto, in any form.

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

Page 2

Green & Shinee

May 16, 2024

To: County of Los Angeles
Custodian of Records

Re: CPRA Request

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.

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 County of Los Angeles, 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

May 16, 2024

To: County of Los Angeles
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
General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County
21L-039\DLCOLA240516.plm

EXHIBIT “LL”



County of Los Angeles

June 11, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 16, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County, Office of the County Counsel ("Counsel") responds to a request you made dated May 16, 2024, for certain records addressed to the Custodian of Records, County of Los Angeles ("County").

On May 28, 2024, Counsel extended the response to your Public Records Act request to June 11, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

Your request asks for the following:

1. ...copies of all Annual Policy Review Acknowledgment Forms signed by Diana Teran for the duration of the time she was employed by the County of Los Angeles in any capacity, and any document or communication referring to Diana Teran's annual review of County of Los Angeles policies.

Please be advised that pursuant to Government Code section 7922.535 subdivision (b), the time to respond to your request must be extended by an additional fourteen (14) days due to the existence of unusual circumstances. The unusual circumstances include the need to search for, collect, and appropriately review potentially responsive records. Counsel estimates that it will be able to provide you with a further response by June 25, 2024.

Richard A. Shinee
June 11, 2024
Page 2

In providing you with this response, the County of Los Angeles does not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By 
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “MM”

County of Los Angeles

June 11, 2024

Dawyn R. Harrison
County Counsel

VIA E-MAIL



Richard Shinee
Green & Shinee, APC
11333 Moorpark Street, Suite 387
Studio City, California 91602
gstras2017@gmail.com

Re: Public Records Act Request Dated May 16, 2024

Dear Mr. Shinee:

This letter is the final response to your May 16, 2024, e-mail, requesting copies of records pursuant to the California Public Records Act, Government Code sections 7920.000-7930.215.¹ As set forth below, you requested:

[A]ll Annual Policy Review Acknowledgment Forms signed by Diana Teran for the duration of the time she was working for the County of Los Angeles Office of Inspector General in any capacity, and any document or communication referring to Diana Teran's annual review of Los Angeles County Office of Inspector General policies.

On May 28, 2024, we notified you that the County of Los Angeles ("County") was extending the time to respond by 14 days due to the existence of unusual circumstances under Government Code section 7922.535. Specifically, our office, among other things, needed to consult with other agencies or components of the agency having substantial interest in the request. We expected to provide you with a determination on or before June 11, 2024, as to whether we are able to identify any disclosable public records.

¹ All statutory references below are to the California Government Code unless otherwise specified.

Richard Shinee
June 11, 2024
Page 2

Our search is now complete. We have located records that are responsive to your request; however, all of the records are exempt from disclosure under the following authorities:

- Records contained in a personnel file where disclosure would constitute an unwarranted invasion of personal privacy which are exempt from disclosure under section 7927.700.
- Records protected by section 7922 allowing an agency to withhold a record by demonstrating that "the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record."

In the spirit of transparency, we included blank copies of the onboarding human resources forms that the Office of Inspector General provides to new employees.

This concludes the County's response to your CPRA request dated May 16, 2024.

The County reserves its right to assert all applicable privileges, doctrines, and exemptions.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By


AMARA KIRBY
Deputy County Counsel
Board Liaison Division

APPROVED AND RELEASED:



JUDY W. WHITEHURST
Chief Deputy

AK:db

Attachments

ATTACHMENT



**COUNTY OF LOS ANGELES
INTERNAL SERVICES DEPARTMENT
INTERNET REGISTRATION FORM**

Type of Registration:

- New
- Delete Prior
- Update Prior

For L.A. County Employees

CUSTOMER INFORMATION

Last Name: _____ First Name: _____ MI: _____

L.A. County Employee No: _____ Internet ID: _____

Department Email Address: _____

Department Name: _____ Department Number: _____

Business Street Address: _____

City: _____ Zip: _____ Phone #: _____

Customer Signature: _____ Date: _____

DEPARTMENT POLICY RULES

PLEASE MARK (✓) YOUR SELECTION:

- | | | |
|--|--|---|
| <input type="checkbox"/> Apply default Countywide Policy | <input type="checkbox"/> Department Policy Rule 0 | <input type="checkbox"/> Department Policy Rule 1 |
| <input type="checkbox"/> Department Policy Rule 2 | <input type="checkbox"/> Department Policy Rule 3 | <input type="checkbox"/> Department Policy Rule 4 |
| <input type="checkbox"/> Social Networking Facebook | <input type="checkbox"/> Social Networking Twitter | <input type="checkbox"/> Social Networking LinkedIn |

POLICY RULE DESCRIPTIONS:

Apply default Countywide Policy: block Pornography, Adult/Mature, Nudity, Intimate Apparel/Swimsuit, Games, Gambling, Personals/Dating, Social Networking, Phishing, Spyware/Effect/Malware, Hacking, Proxy Avoidance and Remote Access Tools.

Department Policy Rule 0: allow full access, no restrictions.

Department Policy Rule 1: allow access to Pornography, Adult/Mature, Nudity, Intimate Apparel/Swimsuit, Games, Gambling, Personals/Dating, Social Networking.

Department Policy Rule 2: allow access to Phishing, Spyware/Effect/Malware, Hacking, Proxy Avoidance, Remote Access Tools.

Department Policy Rule 3: Countywide Global Policy + add'l categories (chosen by your department).

Department Policy Rule 4: Remove categories from the Global Policy (chosen by your department).

Social Networking Facebook / Twitter / LinkedIn : allow access to Facebook, Twitter, and LinkedIn, respectively.

Please Note: Policy Rules "0" through "4" and Social Networking Facebook, Twitter and LinkedIn are not setup by default. Your department must have already submitted an approved "Category Selection Worksheet" before you can request to have rules "0" through "4" applied.

INTERNET CONTENT FILTERING APPROVALS

MANAGER'S NAME (Please Print) _____	SIGNATURE _____	PHONE _____	DATE _____
DIV. CHIEF/MGR'S NAME (Please Print) _____	SIGNATURE _____	PHONE _____	DATE _____
*DEPARTMENT HEAD'S NAME (Print) _____	SIGNATURE _____	PHONE _____	DATE _____
DEPT. INFO. SECURITY OFFICER (If Req'd) _____	SIGNATURE _____	PHONE _____	DATE _____

***Department Head Signature required, if applying for access to Department Policy Rules "0" or "1."**

PROCESSING

PROCESSED BY ISD/DATE:	
FORWARDED TO AUDITOR-CONTROLLER (OCI)/DATE:	<input type="checkbox"/> YES <input type="checkbox"/> NO
PROCESSED BY AUDITOR-CONTROLLER (OCI)/DATE:	

WARNING: FAILURE TO FULLY COMPLETE & SIGN THIS FORM WILL CAUSE A DELAY IN PROCESSING.

You may submit completed registration form to ISDRegistration@isd.lacounty.gov or ISD Registration office at 9150 E. Imperial Hwy, Downey, CA 90242 Mail Stop # 29 to process. For any questions related to registration please call (562) 658-1881.

Instructions Internet Registration Form For LA County Employees

TYPE OF REGISTRATION

New:	Check this box if this is a new request for an Internet ID/access
Delete Prior:	Check this box if you are deleting an Internet ID
Update Prior:	Check this box if you re requesting a change to an existing Internet ID

CUSTOMER INFORMATION

Last Name, First Name, MI:	Print or type your last name, first name, and middle initial
LA County Employee Number:	Enter your six-digit employee number
Internet ID:	Enter your ID. "E" followed by your employee number, ex: E999999
Department Email Address:	Enter your department email address
Department Name:	Enter the full name of your County department, e.g., Court, etc.
Department Number:	Enter your three-digit department number
Business Street Address:	Enter your complete business street address, including room and/or suite number
City, Zip, & Phone:	Enter your city, zip code, and telephone number and extension
Customer Signature & Date:	The customer requiring Internet access must sign and date this form

DEPARTMENT POLICY RULES

The **Countywide Global Policy** will be applied automatically. If your department has created additional policy rules, select the rule set that you would like to apply to this employee.

INTERNET CONTENT FILTERING APPROVALS

Manager's Name, Signature, Date, Phone Number:	The customer's manager must print his/her name, phone number, sign and date this form.
Division Chief/Mgr's Name, Signature, Date, Phone Number:	The customer's division chief, division manager or higher must print his/her name, phone number, sign and date this form.
Department Head's Name, Signature, Date:	If Department Policy Rules "0" or "1" have been selected. The customer's department head must print his/her name, sign and date the form.

PROCESSING

This section is for **ISD's Security Applications Section and Auditor-Controller's Office of County Investigations (OCI)** use only.

ISD Registration Team: If Department Policy Rules "0, 1, 2, or 4" is selected, process the request then forward copy of the registration form to Auditor-Controller for final approval.

**COUNTY OF LOS ANGELES
AGREEMENT FOR ACCEPTABLE USE
AND
CONFIDENTIALITY OF
COUNTY INFORMATION TECHNOLOGY RESOURCES**

ANNUAL

As a County of Los Angeles (County) employee, contractor, subcontractor, volunteer, or other authorized user of County information technology (IT) resources, I understand that I occupy a position of trust. Furthermore, I shall use County IT resources in accordance with my Department's policies, standards, and procedures. I understand that County IT resources shall not be used for:

- For any unlawful purpose;
- For any purpose detrimental to the County or its interests;
- For personal financial gain;
- In any way that undermines or interferes with access to or use of County IT resources for official County purposes;
- In any way that hinders productivity, efficiency, customer service, or interferes with a County IT user's performance of his/her official job duties;

I shall maintain the confidentiality of County IT resources (e.g., business information, personal information, and confidential information).

This Agreement is required by Board of Supervisors Policy No. 6.101 – Use of County Information Technology Resources, which may be consulted directly at website <http://countypolicy.co.la.ca.us/6.101.htm>.

As used in this Agreement, the term "County IT resources" includes, without limitation, computers, systems, networks, software, and data, documentation and other information, owned, leased, managed, operated, or maintained by, or in the custody of, the County or non-County entities for County purposes. The definitions of the terms "County IT resources", "County IT user", "County IT security incident", "County Department", and "computing devices" are fully set forth in Board of Supervisors Policy No. 6.100 – Information Technology and Security Policy, which may be consulted directly at website <http://countypolicy.co.la.ca.us/6.100.htm>. The terms "personal information" and "confidential information" shall have the same meanings as set forth in Board of Supervisors Policy No. 3.040 – General Records Retention and Protection of Records Containing Personal and Confidential Information, which may be consulted directly at website <http://countypolicy.co.la.ca.us/3.040.htm>.

As a County IT user, I agree to the following:

1. Computer crimes: I am aware of California Penal Code Section 502(c) – Comprehensive Computer Data Access and Fraud Act (set forth, in part, below). I shall immediately report to my management any suspected misuse or crimes relating to County IT resources or otherwise.
2. No Expectation of Privacy: I do not expect any right to privacy concerning my activities related to County IT resources, including, without limitation, in anything I create, store, send, or receive using County IT resources. I understand that having no expectation to

any right to privacy includes, for example, that my access and use of County IT resources may be monitored or investigated by authorized persons at any time, without notice or consent.

3. Activities related to County IT resources: I understand that my activities related to County IT resources (e.g., email, instant messaging, blogs, electronic files, County Internet services, and County systems) may be logged/stored, may be a public record, and are subject to audit and review, including, without limitation, periodic monitoring and/or investigation, by authorized persons at any time. I shall not either intentionally, or through negligence, damage, interfere with the operation of County IT resources. I shall neither, prevent authorized access, nor enable unauthorized access to County IT resources responsibly, professionally, ethically, and lawfully.
4. County IT security incident reporting: I shall notify the County Department's Help Desk and/or Departmental Information Security Officer (DISO) as soon as a County IT security incident is suspected.
5. Security access controls: I shall not subvert or bypass any security measure or system which has been implemented to control or restrict access to County IT resources and any related restricted work areas and facilities. I shall not share my computer identification codes and other authentication mechanisms (e.g., logon identification (ID), computer access codes, account codes, passwords, SecurID cards/tokens, biometric logons, and smartcards).
6. Passwords: I shall not keep or maintain any unsecured record of my password(s) to access County IT resources, whether on paper, in an electronic file, or otherwise. I shall comply with all County and County Department policies relating to passwords. I shall immediately report to my management any compromise or suspected compromise of my password(s) and have the password(s) changed immediately.
7. Business purposes: I shall use County IT resources in accordance with my Department's policies, standards, and procedures.
8. Confidentiality: I shall not send, disseminate, or otherwise expose or disclose to any person or organization, any personal and/or confidential information, unless specifically authorized to do so by County management. This includes, without limitation information that is subject to Health Insurance Portability and Accountability Act of 1996, Health Information Technology for Economic and Clinical Health Act of 2009, or any other confidentiality or privacy legislation.
9. Computer virus and other malicious devices: I shall not intentionally introduce any malicious device (e.g., computer virus, spyware, worm, key logger, or malicious code), into any County IT resources. I shall not use County IT resources to intentionally introduce any malicious device into any County IT resources or any non-County IT systems or networks. I shall not disable, modify, or delete computer security software (e.g., antivirus software, antispysware software, firewall software, and host intrusion prevention software) on County IT resources. I shall notify the County Department's Help Desk and/or DISO as soon as any item of County IT resources is suspected of being compromised by a malicious device.

10. Offensive materials: I shall not access, create, or distribute (e.g., via email) any offensive materials (e.g., text or images which are sexually explicit, racial, harmful, or insensitive) on County IT resources (e.g., over County-owned, leased, managed, operated, or maintained local or wide area networks; over the Internet; and over private networks), unless authorized to do so as a part of my assigned job duties (e.g., law enforcement). I shall report to my management any offensive materials observed or received by me on County IT resources.
11. Internet: I understand that the Internet is public and uncensored and contains many sites that may be considered offensive in both text and images. I shall use County Internet services in accordance with my Department's policies and procedures. I understand that my use of the County Internet services may be logged/stored, may be a public record, and are subject to audit and review, including, without limitation, periodic monitoring and/or investigation, by authorized persons at any time. I shall comply with all County Internet use policies, standards, and procedures. I understand that County Internet services may be filtered, but in my use of them, I may be exposed to offensive materials. I agree to hold County harmless from and against any and all liability and expense should I be inadvertently exposed to such offensive materials.
12. Electronic Communications: I understand that County electronic communications (e.g., email, text messages, etc.) created, sent, and/or stored using County electronic communications systems/applications/services are the property of the County. All such electronic communications may be logged/stored, may be a public record, and are subject to audit and review, including, without limitation, periodic monitoring and/or investigation, by authorized persons at any time, without notice or consent. I shall comply with all County electronic communications use policies and use proper business etiquette when communicating over County electronic communications systems/applications/services.
13. Public forums: I shall only use County IT resources to create, exchange, publish, distribute, or disclose in public forums (e.g., blog postings, bulletin boards, chat rooms, Twitter, Facebook, MySpace, and other social networking services) any information (e.g., personal information, confidential information, political lobbying, religious promotion, and opinions) in accordance with Department's policies, standards, and procedures.
14. Internet storage sites: I shall not store County information (i.e., personal, confidential (e.g., social security number, medical record), or otherwise sensitive (e.g., legislative data)) on any Internet storage site in accordance with Department's policies, standards, and procedures.
15. Copyrighted and other proprietary materials: I shall not copy or otherwise use any copyrighted or other proprietary County IT resources (e.g., licensed software and documentation, and data), except as permitted by the applicable license agreement and approved by designated County Department management. I shall not use County IT resources to infringe on copyrighted material.
16. Compliance with County ordinances, rules, regulations, policies, procedures, guidelines, directives, and agreements: I shall comply with all applicable County ordinances, rules, regulations, policies, procedures, guidelines, directives, and agreements relating to County IT resources. These include, without limitation, Board of Supervisors Policy No. 6.100 – Information Technology and Security Policy, Board of Supervisors Policy No.

6.101 – Use of County Information Technology Resources, and Board of Supervisors Policy No. 3.040 – General Records Retention and Protection of Records Containing Personal and Confidential Information.

17. Disciplinary action and other actions and penalties for non-compliance: I understand that my non-compliance with any provision of this Agreement may result in disciplinary action and other actions (e.g., suspension, discharge, denial of access, and termination of contracts) as well as both civil and criminal penalties and that County may seek all possible legal redress.

**CALIFORNIA PENAL CODE SECTION 502(c)
"COMPREHENSIVE COMPUTER DATA ACCESS AND FRAUD ACT"**

Below is a section of the "Comprehensive Computer Data Access and Fraud Act" as it pertains specifically to this Agreement. California Penal Code Section 502(c) is incorporated in its entirety into this Agreement by reference, and all provisions of Penal Code Section 502(c) shall apply. For a complete copy, consult the Penal Code directly at website www.leginfo.ca.gov/.

502(c) Any person who commits any of the following acts is guilty of a public offense:

- (1) Knowingly accesses and without permission alters, damages, deletes, destroys, or otherwise uses any data, computer, computer system, or computer network in order to either (A) devise or execute any scheme or artifice to defraud, deceive, or extort, or (B) wrongfully control or obtain money, property, or data.
- (2) Knowingly accesses and without permission takes, copies, or makes use of any data from a computer, computer system, or computer network, or takes or copies any supporting documentation, whether existing or residing internal or external to a computer, computer system, or computer network.
- (3) Knowingly and without permission uses or causes to be used computer services.
- (4) Knowingly accesses and without permission adds, alters, damages, deletes, or destroys any data, computer software, or computer programs which reside or exist internal or external to a computer, computer system, or computer network.
- (5) Knowingly and without permission disrupts or causes the disruption of computer services or denies or causes the denial of computer services to an authorized user of a computer, computer system, or computer network.
- (6) Knowingly and without permission provides or assists in providing a means of accessing a computer, computer system, or computer network in violation of this section.
- (7) Knowingly and without permission accesses or causes to be accessed any computer, computer system, or computer network.

- (8) Knowingly introduces any computer contaminant into any computer, computer system, or computer network.
- (9) Knowingly and without permission uses the Internet domain name of another individual, corporation, or entity in connection with the sending of one or more electronic mail messages, and thereby damages or causes damage to a computer, computer system, or computer network.

I HAVE READ AND UNDERSTAND THE ABOVE AGREEMENT:

County IT User's Name

County IT User's Signature

County IT User's Employee/ID Number

Date

Manager's Name

Manager's Signature

Manager's Title

Date

CALLING CARD REQUEST FORM



Board of Supervisors - Executive Office
500 W. Temple St. Rm. 383
Los Angeles, CA 90012
Phone: 213-974-9700

Date:

Requested By:

First Name:

Middle Name:

Last Name:

Employee #:

Unit:

Calling Card Type

- 100 - CALIFORNIA
- 200 - UNITED STATES
- 300 - INTERNATIONAL (INCLUDING US)

JUSTIFICATION:

Calling Cards Policy is to establish the issuance, control and acceptable usage of long distance calling cards. The Board Offices and the Executive Offices will follow the policy set forth in Policy: FIS_100_002 "Long Distance Calling Cards"
Card holder is responsible for keeping a physical log of all outgoing long distance calls to insure proper accountability.

REQUESTOR SIGNATURE

DATE

APPROVER SIGNATURE

DATE



**INTERNAL SERVICES DEPARTMENT
REQUEST TO ADD FUEL FOCUS USER TO THE
AUTOMATED FUEL MANAGEMENT INFORMATION SYSTEM (AFMIS)**

Department/Division Name: _____ Fund Org.: _____

Employee Name: _____ Employee No.: _____
(Please type or print)

Employee Job Title: _____

Employee Phone No.: _____

Employee E-mail Address (optional): _____

I am requesting to be added as a Fuel Focus user to the AFMIS.

Employee Signature

Date

This request has been approved by:

Employee's Manager Name (Please print)

Signature

Date

PLEASE RETURN OR FAX (**WITH A COPY OF COUNTY IDENTIFICATION BADGE**) TO:

Jim Gilmartin
ISD/Fleet Services
1100 N. Eastern Avenue, Los Angeles, CA 90063
Phone: (323) 267-3475 FAX: (323) 262-4941
Email: jgilmartin@isd.lacounty.gov

**BOARD OF SUPERVISORS
EMPLOYEE CODE OF CONDUCT
ACKNOWLEDGEMENT**

I, _____ certify that I have read and fully understand the Department's Employee Code of Conduct Policy, Policy No. HR_300_004. I further understand that failure to adhere to the Department's policy may be cause for disciplinary action.

Employee Signature

Date

Supervisor's Signature

Date

Original form: Employee Personnel File
Copy: Employee
 Supervisor



Executive Office, Board of Supervisors User Registration Form

Effective Date

Request Type

Employee Type

First Name

Department

Last Name

Job Title

Employee #

Office Phone

Services Requested:

Internet

e-mail

VPN

H Drive

S Drive

Scrolls

CRM

CRM
Role

Caseworker
Deputy

Other - Special Mailbox / Calendar / File Share Access

Special e-mail Distribution Group

Manager's
Name

Manager's
Signature

**COUNTY OF LOS ANGELES
AGREEMENT FOR ACCEPTABLE USE
AND CONFIDENTIALITY OF
COUNTY INFORMATION ASSETS**

As a County of Los Angeles (County) Workforce Member, and as outlined in Board of Supervisors Policy [6.101](#) "Use of County Information Assets", I understand and agree:

- That I occupy a position of trust, as such I will use County Information Assets in accordance with countywide and Departmental policies, standards, and procedures including, but not limited to, Board of Supervisors Policy [9.015](#) "County Policy of Equity" (CPOE) and Board of Supervisors Policy [9.040](#) "Investigations Of Possible Criminal Activity Within County Government".
- That I am responsible for the security of information and systems to which I have access or to which I may otherwise obtain access even if such access is inadvertent or unintended. I shall maintain the confidentiality of County Information Assets (as defined in Board of Supervisors Policy [6.100](#) – Information Security Policy).
- That County Information Assets must not be used for:
 - Any unlawful purpose;
 - Any purpose detrimental to the County or its interests;
 - Personal financial gain;
 - In any way that undermines or interferes with access to or use of County Information Asset for official County purposes;
 - In any way that hinders productivity, efficiency, customer service, or interferes with other County Workforce Members performance of his/her official job duties.
- That records, files, databases, and systems contain restricted, confidential or internal use information (i.e. non-public information) as well as Public information. I may access, read or handle Non-public information to the extent required to perform my assigned duties. Although I may have access to Non-public information, I agree to not access such information unless it is necessary for the performance of my assigned duties.
- Not to divulge, publish, share, expose or otherwise make known to unauthorized persons, organization or the public any County Non-public Information. I understand that:
 - I may divulge Non-public Information to authorized County staff and managers as necessary to perform my job duties;
 - I may divulge Non-public Information to others only if specifically authorized to do so by federal, state, or local statute, regulation or court order, and with the knowledge of my supervisor or manager;
 - I may not discuss Non-public Information outside of the workplace or outside of my usual work area;
 - To consult my supervisor or manager on any questions I may have concerning whether particular information may be disclosed.
- To report any actual breach of Information Security or a situation that could potentially result in a breach, misuse or crime relating to County Information Assets whether this is on my part or on the part of another person following proper County and Departmental procedures. I understand that I am expected to assist in protecting evidence of crimes relating to Information Assets and will follow the instructions of, and cooperate, with management and any investigative response team.
- I have no expectation of privacy concerning my activities related to the use of, or access to, County Information Assets, including anything I create, store, send, or receive using County Information Assets. My actions may be monitored, logged, stored, made public, and are subject to investigation, audit and review without notice or consent.
- Not possess a County Information Asset without authorization. Although I may be granted authorization to possess and use a County Information Asset for the performance of my duties, I will never be granted any ownership or property rights to County Information Assets. All Information

Assets and Information is the property of the County. I must surrender County Information Assets upon request. Any Information Asset retained without authorization will be considered stolen and prosecuted as such.

- Not intentionally, or through negligence, damage or interfere with the operation of County Information Assets.
- Neither, prevent authorized access, nor enable unauthorized access to County Information Assets.
- To not make computer networks or systems available to others unless I have received specific authorization from the Information Owner.
 - Not share my computer identification codes and other authentication mechanisms (e.g., logon identification (ID), computer access codes, account codes, passwords, ID cards/tokens, biometric logons, and smartcards) with any other person or entity. Nor will I keep or maintain any unsecured record of my password(s) to access County Information Assets, whether on paper, in an electronic file.
 - I am accountable for all activities undertaken through my authentication mechanisms (e.g., logon identification (ID), computer access codes, account codes, passwords, ID cards/tokens, biometric logons, and smartcards).
- Not intentionally introduce any malicious software (e.g., computer virus, spyware, worm, key logger, or malicious code), into any County Information Asset or any non-County Information Systems or networks.
- Not subvert or bypass any security measure or system which has been implemented to control or restrict access to County Information Assets and any restricted work areas and facilities.
 - Disable, modify, or delete computer security software (e.g., antivirus, antispyware, firewall, and/or host intrusion prevention software) on County Information Assets. I shall immediately report any indication that a County Information Asset is compromised by malware following proper County and Departmental procedures.
- Not access, create, or distribute (e.g., via email, Instant Messaging or any other means) any offensive materials (e.g., text or images which are defamatory, sexually explicit, racial, harmful, or insensitive) on County Information Assets, unless authorized to do so as a part of my assigned job duties (e.g., law enforcement). I will report any offensive materials observed or received by me on County Information Assets following proper County and Departmental procedures.
- That the Internet is public and uncensored and contains many sites that may be considered offensive in both text and images. I shall use County Internet services in accordance with countywide and Departmental policies and procedures. I understand that County Internet services may be filtered, however, my use of resources provided on the Internet may expose me to offensive materials. I agree to hold County harmless from and against any and all liability and expense should I be inadvertently exposed to such offensive material.
- That County electronic communications (e.g., email, instant messages, etc.) created, sent, and/or stored using County electronic communications services are the property of the County. I will use proper business etiquette when communicating using County electronic communications services.
- Only use County Information Assets to create, exchange, publish, distribute, or disclose in public forums and social media (e.g., blog postings, bulletin boards, chat rooms, Twitter, Instagram, Facebook, MySpace, and other social media services) any information (e.g., personal information, confidential information, political lobbying, religious promotion, and opinions) in accordance with countywide and Departmental policies, standards, and procedures.
- Not store County Non-public Information on any Internet storage site except in accordance with countywide and Departmental policies, standards, and procedures.
- Not copy or otherwise use any copyrighted or other proprietary County Information Assets (e.g., licensed software, documentation, and data), except as permitted by the applicable license

agreement and approved by County Department management. Nor will I use County Information Assets to infringe on copyrighted material.

- That noncompliance may result in disciplinary action (e.g., suspension, discharge, denial of access, and termination of contracts) as well as both civil and criminal penalties and that County may seek all possible legal redress.

I HAVE READ AND UNDERSTAND THE ABOVE AGREEMENT:

_____	_____
County Workforce Member's Name	County Workforce Member's Signature
_____	_____
County Workforce Member's ID Number	Date
_____	_____
Manager's Name	Manager's Signature
_____	_____
Manager's Title	Date

CERTIFICATION FOR MILEAGE REIMBURSEMENT

I. EMPLOYEE AND CERTIFICATION INFORMATION

Employee Name: _____

Employee Number: _____ Dept No. _____

Division/District: _____

Cert Start Date: _____ Cert Stop Date: _____

Certification Type: **M**

II. LOCATION

Location:
(Org Code) _____

Headquarter: Street: _____

City: _____

State: _____ Zip: _____

III. DRIVER'S LICENSE INFORMATION

Driver's License Type: **Class C**

Driver's License Number: _____

Driver's License Expiration Date: _____

IV. AUTHORIZING SIGNATURE

Chief Deputy / Division Chief Signature

Date

COUNTY OF LOS ANGELES
MILEAGE CERTIFICATION

Every employee designated by management to be certified for mileage reimbursement shall complete the appropriate certification forms and obtain a copy of the Department's *Mileage Permittee Self-Insurance Program and Responsibilities* policy. Mileage permittees are expected to adhere to all certification and Mileage Permittee Self-Insurance Program requirements.

ACKNOWLEDGEMENT

I, _____ acknowledge that I have read and received a copy of the document entitled, Information and Instructions for Permittee Drivers, and a copy of the Notice of Self-Insurance. I will notify my supervisor of any change in my driver's license status which would preclude me from driving on County business (e.g., suspended, restricted, or revoked license).

Permittee Signature

Date

Supervisor's Signature

Date

Original Form: Permittee's Personnel File

CERTIFICATION OF RECEIPT

This is to certify that I have read and received a copy of the document entitled, Information and Instructions for Permittee Drivers, and a copy of the County of Los Angeles: Evidence of Financial Responsibility. By signing this Certification, I also agree that:

- I will notify my supervisor of any change in my driver's license status which would preclude me from driving on County business (e.g. suspended, restricted, or revoked license).
- I am not allowed to claim or receive reimbursement for damages both from the County and also from my own private auto liability policy, nor from any other source, including any third party who caused the accident or that party's insurance company.
- In the event I receive reimbursement for damages from another source, including from my own personal auto insurance policy or from a third party or that party's insurance company, that I will return one hundred percent of any County reimbursement I received for the same damage.

MILEAGE PERMITTEE (Print Name)

MILEAGE PERMITTEE (Signature)

DATE

COUNTY OF LOS ANGELES — BOARD OF SUPERVISORS

PROPERTY AND ACCESS CLEARANCE FORM

NAME:

EMPLOYEE NO:

EFFECTIVE DATE:

TITLE:

REASON FOR LEAVING:

DIVISION / DISTRICT:

The items below must be returned to the designated division no later than the employee's last working day. Failure to do so may delay outgoing process, including issuance of final payment.

BUILDING MANAGEMENT	
Office Keys	
Other	
Building Manager Signature/ Date:	

FISCAL SERVICES			
Gasoline Card	Vehicle	Vehicle #	
Telephone Card	Other		
Fiscal Manager Signature/ Date:			

IRM			
Blackberry			Secure ID Card
Laptop/ Home Computer			Flashdrive
iPhone	PIN		
Remain Active	Yes	No	
IRM Manager Signature/ Date:			

CONFLICT \ LOBBYIST			
Leaving Office Form Needed?	Yes	No	
COI \ L Manager Signature/ Date:			

HUMAN RESOURCES			
Identification Badge			Parking Decal
Board Room Badge			Lot 14 Key Card
Elevator / Door Key Card			Other
HR Operations Signature/ Date:			

I certify that all County property that was issued to me has been returned:

Employee Signature

Date

Supervisor/ Manager Signature

Date

EXHIBIT “NN”

County of Los Angeles

June 25, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request dated May 16, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County, Office of the County Counsel ("Counsel") responds to a request you made dated May 16, 2024, for certain records addressed to the Custodian of Records, County of Los Angeles ("County").

On May 28, 2024, Counsel extended the response to your Public Records Act ("PRA") request to June 11, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

On June 11, 2024, the Counsel extended the response to your PRA request to June 25, 2024, so that the County and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

1. ...copies of all Annual Policy Review Acknowledgment Forms signed by Diana Teran for the duration of the time she was employed by the County of Los Angeles in any capacity, and any document or communication referring to Diana Teran's annual review of County of Los Angeles policies.

Please be advised that the County and Counsel continue to search for, collect, and appropriately review potentially responsive records.

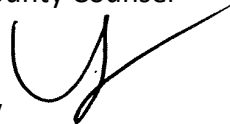
Richard A. Shinee
June 25, 2024
Page 2

Counsel anticipates that it will be able to provide you with a further response by July 25, 2024.

In providing you with this response, the County of Los Angeles does not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

Dawyn R. Harrison
County Counsel

A handwritten signature in black ink, appearing to be 'AS', written over a horizontal line.

By
Adam Sexton
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “OO”



County of Los Angeles

July 25, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 16, 2024

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Please be advised that the County and Counsel continue to search for, collect, and appropriately review potentially responsive records.

Richard A. Shinee
July 25, 2024
Page 2

Counsel anticipates that it will be able to provide you with a further response by August 15, 2024.

In providing you with this response, the County of Los Angeles does not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Very truly yours,

DAWYN R. HARRISON
County Counsel

A handwritten signature in black ink, appearing to read 'AS', with a long horizontal stroke extending to the right.

By
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “PP”

County of Los Angeles

August 2, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 16, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County Office of the County Counsel ("Counsel") responds to your request, dated May 16, 2024, for certain records sent to the County of Los Angeles ("County").

On May 28, 2024, Counsel extended the time to respond to your Public Records Act ("PRA") request to June 11, 2024, pursuant to California Government Code section 7922.535 subdivision (b).

On June 11, June 25, and July 25, 2024, Counsel extended the response to your PRA request, so that the County and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

This letter from Counsel shall serve as response on behalf of the County.

REQUEST:

Your PRA request asks for the following:

1. copies of all Annual Policy Review Acknowledgment Forms signed by Diana Teran for the duration of the time she was employed by the County of Los Angeles in any capacity, and any document or communication referring to Diana Teran's annual review of County of Los Angeles policies.

RESPONSE:

In Response to Request No. 1, we have located records that are responsive to your request. However, the records are exempt from disclosure under the following authorities:

- Records contained in a personnel file where disclosure would constitute an unwarranted invasion of personal privacy and are exempt from disclosure under section 7927.700.

Richard A. Shinee
August 2, 2024
Page 2

- Records protected by section 7922 allowing an agency to withhold a record by demonstrating that "the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record."

On June 11, 2024, in the spirit of transparency, Counsel provided you with blank copies of human resource forms commonly provided to new employees.

In providing you with this response, the County does not waive any rights, defenses, claims of privilege, or claims of exemption, with respect to any record under the California Public Records Act or any other applicable statutes or laws.

This concludes the County's response to your PRA request dated May 16, 2024. Thank you for your time and attention with this matter.

Very truly yours,

DAWYN R. HARRISON
County Counsel



By
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

APPROVED AND RELEASED:



NICOLE DAVIS TINKHAM
Chief Deputy

AS:pec

EXHIBIT “QQ”

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 16, 2024

Via Email & US mail
PRA@da.lacounty.gov

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

Re: California Public Records Act Request for Records

Dear Ladies and Gentlemen:

This letter is a request to obtain records in possession of the County of 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 copies of all Annual Policy Review Acknowledgment Forms signed by Diana Teran for the duration of the time she was working for the County of Los Angeles District Attorney's Office in any capacity, and any document or communication referring to Diana Teran's annual review of County of Los Angeles District Attorney's Office policies.

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 emails as well as any attachments thereto, in any form.

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

Page 2

Green & Shinee

May 16, 2024

To: County of Los Angeles District Attorney's Office
Custodian of Records

Re: CPRA Request

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.

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 County of Los Angeles 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 of Los Angeles District Attorney's Office for the reasonable cost of copying. Please inform us in advance if the cost will be greater than \$50.

Page 3

Green & Shinee

May 16, 2024

To: County of Los Angeles District Attorney's Office
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
General Counsel to Association of
Deputy District Attorneys for
Los Angeles County

RAS:plm

cc: Michele Hanisee, President, Association of Deputy District Attorneys for Los Angeles County
21L-039\DLDAO240516.plm

EXHIBIT “RR”



County of Los Angeles

July 9, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 16, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County, Office of the County Counsel ("Counsel") responds to a request you made dated May 16, 2024, for certain records addressed to the County of Los Angeles District Attorney's Office ("LADA").

Your request asks for the following:

1. ...copies of all Annual Policy Review Acknowledgment Forms signed by Diana Teran for the duration of the time she was working for the County of Los Angeles District Attorney's Office in any capacity, and any document or communication referring to Diana Teran's annual review of County of Los Angeles District Attorney's Office policies.

Please be advised that the review process associated with this request is on-going as the LADA and Counsel continue to search for, collect, and appropriately review potentially responsive records. We anticipate providing you with an update on or before July 30, 2024.

In providing you with this response, the County of Los Angeles does not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Thank you for your time and attention in this matter.

Very truly yours,

Dawyn R. Harrison
County Counsel

By 
Adam Sexton
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “SS”



County of Los Angeles

August 1, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request

Dear Mr. Shinee:

This letter from the Los Angeles County, Office of the County Counsel ("Counsel") responds to a request you made dated May 16, 2024, for certain records addressed to the County of Los Angeles District Attorney's Office ("LADA").

On July 9, 2024, Counsel extended the response to your Public Records Act request so that the LADA and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

Your request asks for the following:

1. ...copies of all Annual Policy Review Acknowledgment Forms signed by Diana Teran for the duration of the time she was working for the County of Los Angeles District Attorney's Office in any capacity, and any document or communication referring to Diana Teran's annual review of County of Los Angeles District Attorney's Office policies.

Please be advised that the review process associated with this request is on-going as the LADA and Counsel continue to search for, collect, and appropriately review potentially responsive records. We anticipate providing you with an update on or before August 30, 2024.

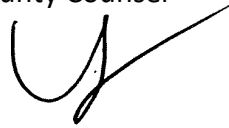
Richard A. Shinee
August 1, 2024
Page 2

In providing you with this response, the County of Los Angeles and the LADA do not waive any rights, defenses, claims of privilege or claims of exemption of any record under the California Public Records Act or any other statutes.

Thank you for your time and attention in this matter.

Very truly yours,

DAWYN R. HARRISON
County Counsel

A handwritten signature in black ink, appearing to be 'AS', written over a horizontal line.

By
ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

AS:pec

EXHIBIT “TT”

County of Los Angeles

August 27, 2024

Dawyn R. Harrison
County Counsel



VIA E-MAIL

Richard A. Shinee
11333 Moorpark Street, Suite 387
Studio City, California 91602
GSRAS2017@gmail.com

Re: Public Records Act Request Dated May 16, 2024

Dear Mr. Shinee:

This letter from the Los Angeles County Office of the County Counsel ("Counsel") responds to a request you made dated May 16, 2024, for certain records sent to the Los Angeles County Office of the District Attorney ("LADA").

On July 9, 2024, and August 1, 2024, Counsel drafted a response to your Public Records Act ("PRA") request extending the response date so the LADA and Counsel could continue searching for, collecting, and appropriately reviewing potentially responsive records.

This letter from Counsel shall serve as response on behalf of the LADA.

REQUEST:

Your request asks for the following:

1. . . . copies of all Annual Policy Review Acknowledgment Forms signed by Diana Teran for the duration of the time she was working for the County of Los Angeles District Attorney's Office in any capacity, and any document or communication referring to Diana Teran's annual review of County of Los Angeles District Attorney's Office policies.

RESPONSE:

In Response to Request No. 1, we have located records that are responsive to your request. However, the records are exempt from disclosure under the following authorities:

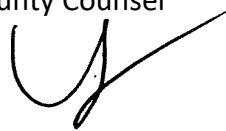
- Records contained in a personnel file where disclosure would constitute an unwarranted invasion of personal privacy and are exempt from disclosure under section 7927.700.
- Records protected by section 7922 allowing an agency to withhold a record by demonstrating that "the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record."

In providing you with this response, the County does not waive any rights, defenses, claims of privilege, or claims of exemption, with respect to any record under the California Public Records Act or any other applicable statutes or laws.

This concludes the County's response to your PRA request dated May 16, 2024. Thank you for your time and attention with this matter.

Very truly yours,

DAWYN R. HARRISON
County Counsel

By 

ADAM SEXTON
Deputy County Counsel
Justice and Safety Division

APPROVED AND RELEASED:


NICOLE DAVIS TINKHAM
Chief Deputy

AS:pec

Attachments



**COUNTY OF LOS ANGELES
INTERNAL SERVICES DEPARTMENT
INTERNET REGISTRATION FORM**

Type of Registration:

- New
- Delete Prior
- Update Prior

For L.A. County Employees

CUSTOMER INFORMATION

Last Name: _____ First Name: _____ MI: _____

L.A. County Employee No: _____ Internet ID: _____

Department Email Address: _____

Department Name: _____ Department Number: _____

Business Street Address: _____

City: _____ Zip: _____ Phone #: _____

Customer Signature: _____ Date: _____

DEPARTMENT POLICY RULES

PLEASE MARK (✓) YOUR SELECTION:

- | | | |
|--|--|---|
| <input type="checkbox"/> Apply default Countywide Policy | <input type="checkbox"/> Department Policy Rule 0 | <input type="checkbox"/> Department Policy Rule 1 |
| <input type="checkbox"/> Department Policy Rule 2 | <input type="checkbox"/> Department Policy Rule 3 | <input type="checkbox"/> Department Policy Rule 4 |
| <input type="checkbox"/> Social Networking Facebook | <input type="checkbox"/> Social Networking Twitter | <input type="checkbox"/> Social Networking LinkedIn |

POLICY RULE DESCRIPTIONS:

Apply default Countywide Policy: block Pornography, Adult/Mature, Nudity, Intimate Apparel/Swimsuit, Games, Gambling, Personals/Dating, Social Networking, Phishing, Spyware/Effect/Malware, Hacking, Proxy Avoidance and Remote Access Tools.

Department Policy Rule 0: allow full access, no restrictions.

Department Policy Rule 1: allow access to Pornography, Adult/Mature, Nudity, Intimate Apparel/Swimsuit, Games, Gambling, Personals/Dating, Social Networking.

Department Policy Rule 2: allow access to Phishing, Spyware/Effect/Malware, Hacking, Proxy Avoidance, Remote Access Tools.

Department Policy Rule 3: Countywide Global Policy + add'l categories (chosen by your department).

Department Policy Rule 4: Remove categories from the Global Policy (chosen by your department).

Social Networking Facebook / Twitter / LinkedIn : allow access to Facebook, Twitter, and LinkedIn, respectively.

Please Note: Policy Rules "0" through "4" and Social Networking Facebook, Twitter and LinkedIn are not setup by default. Your department must have already submitted an approved "Category Selection Worksheet" before you can request to have rules "0" through "4" applied.

INTERNET CONTENT FILTERING APPROVALS

MANAGER'S NAME (Please Print) _____	SIGNATURE _____	PHONE _____	DATE _____
DIV. CHIEF/MGR'S NAME (Please Print) _____	SIGNATURE _____	PHONE _____	DATE _____
*DEPARTMENT HEAD'S NAME (Print) _____	SIGNATURE _____	PHONE _____	DATE _____
DEPT. INFO. SECURITY OFFICER (If Req'd) _____	SIGNATURE _____	PHONE _____	DATE _____

***Department Head Signature required, if applying for access to Department Policy Rules "0" or "1."**

PROCESSING

PROCESSED BY ISD/DATE:	
FORWARDED TO AUDITOR-CONTROLLER (OCI)/DATE:	<input type="checkbox"/> YES <input type="checkbox"/> NO
PROCESSED BY AUDITOR-CONTROLLER (OCI)/DATE:	

WARNING: FAILURE TO FULLY COMPLETE & SIGN THIS FORM WILL CAUSE A DELAY IN PROCESSING.

You may submit completed registration form to ISDRegistration@isd.lacounty.gov or ISD Registration office at 9150 E. Imperial Hwy, Downey, CA 90242 Mail Stop # 29 to process. For any questions related to registration please call (562) 658-1881.

Instructions Internet Registration Form For LA County Employees

TYPE OF REGISTRATION

New:	Check this box if this is a new request for an Internet ID/access
Delete Prior:	Check this box if you are deleting an Internet ID
Update Prior:	Check this box if you re requesting a change to an existing Internet ID

CUSTOMER INFORMATION

Last Name, First Name, MI:	Print or type your last name, first name, and middle initial
LA County Employee Number:	Enter your six-digit employee number
Internet ID:	Enter your ID. "E" followed by your employee number, ex: E999999
Department Email Address:	Enter your department email address
Department Name:	Enter the full name of your County department, e.g., Court, etc.
Department Number:	Enter your three-digit department number
Business Street Address:	Enter your complete business street address, including room and/or suite number
City, Zip, & Phone:	Enter your city, zip code, and telephone number and extension
Customer Signature & Date:	The customer requiring Internet access must sign and date this form

DEPARTMENT POLICY RULES

The **Countywide Global Policy** will be applied automatically. If your department has created additional policy rules, select the rule set that you would like to apply to this employee.

INTERNET CONTENT FILTERING APPROVALS

Manager's Name, Signature, Date, Phone Number:	The customer's manager must print his/her name, phone number, sign and date this form.
Division Chief/Mgr's Name, Signature, Date, Phone Number:	The customer's division chief, division manager or higher must print his/her name, phone number, sign and date this form.
Department Head's Name, Signature, Date:	If Department Policy Rules "0" or "1" have been selected. The customer's department head must print his/her name, sign and date the form.

PROCESSING

This section is for **ISD's Security Applications Section and Auditor-Controller's Office of County Investigations (OCI)** use only.

ISD Registration Team: If Department Policy Rules "0, 1, 2, or 4" is selected, process the request then forward copy of the registration form to Auditor-Controller for final approval.

**COUNTY OF LOS ANGELES
AGREEMENT FOR ACCEPTABLE USE
AND
CONFIDENTIALITY OF
COUNTY INFORMATION TECHNOLOGY RESOURCES**

ANNUAL

As a County of Los Angeles (County) employee, contractor, subcontractor, volunteer, or other authorized user of County information technology (IT) resources, I understand that I occupy a position of trust. Furthermore, I shall use County IT resources in accordance with my Department's policies, standards, and procedures. I understand that County IT resources shall not be used for:

- For any unlawful purpose;
- For any purpose detrimental to the County or its interests;
- For personal financial gain;
- In any way that undermines or interferes with access to or use of County IT resources for official County purposes;
- In any way that hinders productivity, efficiency, customer service, or interferes with a County IT user's performance of his/her official job duties;

I shall maintain the confidentiality of County IT resources (e.g., business information, personal information, and confidential information).

This Agreement is required by Board of Supervisors Policy No. 6.101 – Use of County Information Technology Resources, which may be consulted directly at website <http://countypolicy.co.la.ca.us/6.101.htm>.

As used in this Agreement, the term "County IT resources" includes, without limitation, computers, systems, networks, software, and data, documentation and other information, owned, leased, managed, operated, or maintained by, or in the custody of, the County or non-County entities for County purposes. The definitions of the terms "County IT resources", "County IT user", "County IT security incident", "County Department", and "computing devices" are fully set forth in Board of Supervisors Policy No. 6.100 – Information Technology and Security Policy, which may be consulted directly at website <http://countypolicy.co.la.ca.us/6.100.htm>. The terms "personal information" and "confidential information" shall have the same meanings as set forth in Board of Supervisors Policy No. 3.040 – General Records Retention and Protection of Records Containing Personal and Confidential Information, which may be consulted directly at website <http://countypolicy.co.la.ca.us/3.040.htm>.

As a County IT user, I agree to the following:

1. Computer crimes: I am aware of California Penal Code Section 502(c) – Comprehensive Computer Data Access and Fraud Act (set forth, in part, below). I shall immediately report to my management any suspected misuse or crimes relating to County IT resources or otherwise.
2. No Expectation of Privacy: I do not expect any right to privacy concerning my activities related to County IT resources, including, without limitation, in anything I create, store, send, or receive using County IT resources. I understand that having no expectation to

any right to privacy includes, for example, that my access and use of County IT resources may be monitored or investigated by authorized persons at any time, without notice or consent.

3. Activities related to County IT resources: I understand that my activities related to County IT resources (e.g., email, instant messaging, blogs, electronic files, County Internet services, and County systems) may be logged/stored, may be a public record, and are subject to audit and review, including, without limitation, periodic monitoring and/or investigation, by authorized persons at any time. I shall not either intentionally, or through negligence, damage, interfere with the operation of County IT resources. I shall neither, prevent authorized access, nor enable unauthorized access to County IT resources responsibly, professionally, ethically, and lawfully.
4. County IT security incident reporting: I shall notify the County Department's Help Desk and/or Departmental Information Security Officer (DISO) as soon as a County IT security incident is suspected.
5. Security access controls: I shall not subvert or bypass any security measure or system which has been implemented to control or restrict access to County IT resources and any related restricted work areas and facilities. I shall not share my computer identification codes and other authentication mechanisms (e.g., logon identification (ID), computer access codes, account codes, passwords, SecurID cards/tokens, biometric logons, and smartcards).
6. Passwords: I shall not keep or maintain any unsecured record of my password(s) to access County IT resources, whether on paper, in an electronic file, or otherwise. I shall comply with all County and County Department policies relating to passwords. I shall immediately report to my management any compromise or suspected compromise of my password(s) and have the password(s) changed immediately.
7. Business purposes: I shall use County IT resources in accordance with my Department's policies, standards, and procedures.
8. Confidentiality: I shall not send, disseminate, or otherwise expose or disclose to any person or organization, any personal and/or confidential information, unless specifically authorized to do so by County management. This includes, without limitation information that is subject to Health Insurance Portability and Accountability Act of 1996, Health Information Technology for Economic and Clinical Health Act of 2009, or any other confidentiality or privacy legislation.
9. Computer virus and other malicious devices: I shall not intentionally introduce any malicious device (e.g., computer virus, spyware, worm, key logger, or malicious code), into any County IT resources. I shall not use County IT resources to intentionally introduce any malicious device into any County IT resources or any non-County IT systems or networks. I shall not disable, modify, or delete computer security software (e.g., antivirus software, antispysware software, firewall software, and host intrusion prevention software) on County IT resources. I shall notify the County Department's Help Desk and/or DISO as soon as any item of County IT resources is suspected of being compromised by a malicious device.

10. Offensive materials: I shall not access, create, or distribute (e.g., via email) any offensive materials (e.g., text or images which are sexually explicit, racial, harmful, or insensitive) on County IT resources (e.g., over County-owned, leased, managed, operated, or maintained local or wide area networks; over the Internet; and over private networks), unless authorized to do so as a part of my assigned job duties (e.g., law enforcement). I shall report to my management any offensive materials observed or received by me on County IT resources.
11. Internet: I understand that the Internet is public and uncensored and contains many sites that may be considered offensive in both text and images. I shall use County Internet services in accordance with my Department's policies and procedures. I understand that my use of the County Internet services may be logged/stored, may be a public record, and are subject to audit and review, including, without limitation, periodic monitoring and/or investigation, by authorized persons at any time. I shall comply with all County Internet use policies, standards, and procedures. I understand that County Internet services may be filtered, but in my use of them, I may be exposed to offensive materials. I agree to hold County harmless from and against any and all liability and expense should I be inadvertently exposed to such offensive materials.
12. Electronic Communications: I understand that County electronic communications (e.g., email, text messages, etc.) created, sent, and/or stored using County electronic communications systems/applications/services are the property of the County. All such electronic communications may be logged/stored, may be a public record, and are subject to audit and review, including, without limitation, periodic monitoring and/or investigation, by authorized persons at any time, without notice or consent. I shall comply with all County electronic communications use policies and use proper business etiquette when communicating over County electronic communications systems/applications/services.
13. Public forums: I shall only use County IT resources to create, exchange, publish, distribute, or disclose in public forums (e.g., blog postings, bulletin boards, chat rooms, Twitter, Facebook, MySpace, and other social networking services) any information (e.g., personal information, confidential information, political lobbying, religious promotion, and opinions) in accordance with Department's policies, standards, and procedures.
14. Internet storage sites: I shall not store County information (i.e., personal, confidential (e.g., social security number, medical record), or otherwise sensitive (e.g., legislative data)) on any Internet storage site in accordance with Department's policies, standards, and procedures.
15. Copyrighted and other proprietary materials: I shall not copy or otherwise use any copyrighted or other proprietary County IT resources (e.g., licensed software and documentation, and data), except as permitted by the applicable license agreement and approved by designated County Department management. I shall not use County IT resources to infringe on copyrighted material.
16. Compliance with County ordinances, rules, regulations, policies, procedures, guidelines, directives, and agreements: I shall comply with all applicable County ordinances, rules, regulations, policies, procedures, guidelines, directives, and agreements relating to County IT resources. These include, without limitation, Board of Supervisors Policy No. 6.100 – Information Technology and Security Policy, Board of Supervisors Policy No.

6.101 – Use of County Information Technology Resources, and Board of Supervisors Policy No. 3.040 – General Records Retention and Protection of Records Containing Personal and Confidential Information.

17. Disciplinary action and other actions and penalties for non-compliance: I understand that my non-compliance with any provision of this Agreement may result in disciplinary action and other actions (e.g., suspension, discharge, denial of access, and termination of contracts) as well as both civil and criminal penalties and that County may seek all possible legal redress.

**CALIFORNIA PENAL CODE SECTION 502(c)
"COMPREHENSIVE COMPUTER DATA ACCESS AND FRAUD ACT"**

Below is a section of the "Comprehensive Computer Data Access and Fraud Act" as it pertains specifically to this Agreement. California Penal Code Section 502(c) is incorporated in its entirety into this Agreement by reference, and all provisions of Penal Code Section 502(c) shall apply. For a complete copy, consult the Penal Code directly at website www.leginfo.ca.gov/.

502(c) Any person who commits any of the following acts is guilty of a public offense:

- (1) Knowingly accesses and without permission alters, damages, deletes, destroys, or otherwise uses any data, computer, computer system, or computer network in order to either (A) devise or execute any scheme or artifice to defraud, deceive, or extort, or (B) wrongfully control or obtain money, property, or data.
- (2) Knowingly accesses and without permission takes, copies, or makes use of any data from a computer, computer system, or computer network, or takes or copies any supporting documentation, whether existing or residing internal or external to a computer, computer system, or computer network.
- (3) Knowingly and without permission uses or causes to be used computer services.
- (4) Knowingly accesses and without permission adds, alters, damages, deletes, or destroys any data, computer software, or computer programs which reside or exist internal or external to a computer, computer system, or computer network.
- (5) Knowingly and without permission disrupts or causes the disruption of computer services or denies or causes the denial of computer services to an authorized user of a computer, computer system, or computer network.
- (6) Knowingly and without permission provides or assists in providing a means of accessing a computer, computer system, or computer network in violation of this section.
- (7) Knowingly and without permission accesses or causes to be accessed any computer, computer system, or computer network.

- (8) Knowingly introduces any computer contaminant into any computer, computer system, or computer network.
- (9) Knowingly and without permission uses the Internet domain name of another individual, corporation, or entity in connection with the sending of one or more electronic mail messages, and thereby damages or causes damage to a computer, computer system, or computer network.

I HAVE READ AND UNDERSTAND THE ABOVE AGREEMENT:

County IT User's Name

County IT User's Signature

County IT User's Employee/ID Number

Date

Manager's Name

Manager's Signature

Manager's Title

Date

CALLING CARD REQUEST FORM



Board of Supervisors - Executive Office
 500 W. Temple St. Rm. 383
 Los Angeles, CA 90012
 Phone: 213-974-9700

Date:

Requested By:

First Name:
 Middle Name:
 Last Name:
 Employee #:
 Unit:

Calling Card Type

- 100 - CALIFORNIA
- 200 - UNITED STATES
- 300 - INTERNATIONAL (INCLUDING US)

JUSTIFICATION:

Calling Cards Policy is to establish the issuance, control and acceptable usage of long distance calling cards. The Board Offices and the Executive Offices will follow the policy set forth in Policy: FIS_100_002 "Long Distance Calling Cards"
 Card holder is responsible for keeping a physical log of all outgoing long distance calls to insure proper accountability.

REQUESTOR SIGNATURE

DATE

APPROVER SIGNATURE

DATE



**INTERNAL SERVICES DEPARTMENT
REQUEST TO ADD FUEL FOCUS USER TO THE
AUTOMATED FUEL MANAGEMENT INFORMATION SYSTEM (AFMIS)**

Department/Division Name: _____ Fund Org.: _____

Employee Name: _____ Employee No.: _____
(Please type or print)

Employee Job Title: _____

Employee Phone No.: _____

Employee E-mail Address (optional): _____

I am requesting to be added as a Fuel Focus user to the AFMIS.

Employee Signature

Date

This request has been approved by:

Employee's Manager Name (Please print)

Signature

Date

PLEASE RETURN OR FAX (**WITH A COPY OF COUNTY IDENTIFICATION BADGE**) TO:

Jim Gilmartin
ISD/Fleet Services
1100 N. Eastern Avenue, Los Angeles, CA 90063
Phone: (323) 267-3475 FAX: (323) 262-4941
Email: jgilmartin@isd.lacounty.gov

**BOARD OF SUPERVISORS
EMPLOYEE CODE OF CONDUCT
ACKNOWLEDGEMENT**

I, _____ certify that I have read and fully understand the Department's Employee Code of Conduct Policy, Policy No. HR_300_004. I further understand that failure to adhere to the Department's policy may be cause for disciplinary action.

Employee Signature

Date

Supervisor's Signature

Date

Original form: Employee Personnel File
Copy: Employee
 Supervisor



Executive Office, Board of Supervisors User Registration Form

Effective Date

Request Type

Employee Type

First Name

Department

Last Name

Job Title

Employee #

Office Phone

Services Requested:

Internet

e-mail

VPN

H Drive

S Drive

Scrolls

CRM

CRM
Role

Caseworker
Deputy

Other - Special Mailbox / Calendar / File Share Access

Special e-mail Distribution Group

Manager's
Name

Manager's
Signature

**COUNTY OF LOS ANGELES
AGREEMENT FOR ACCEPTABLE USE
AND CONFIDENTIALITY OF
COUNTY INFORMATION ASSETS**

As a County of Los Angeles (County) Workforce Member, and as outlined in Board of Supervisors Policy [6.101](#) "Use of County Information Assets", I understand and agree:

- That I occupy a position of trust, as such I will use County Information Assets in accordance with countywide and Departmental policies, standards, and procedures including, but not limited to, Board of Supervisors Policy [9.015](#) "County Policy of Equity" (CPOE) and Board of Supervisors Policy [9.040](#) "Investigations Of Possible Criminal Activity Within County Government".
- That I am responsible for the security of information and systems to which I have access or to which I may otherwise obtain access even if such access is inadvertent or unintended. I shall maintain the confidentiality of County Information Assets (as defined in Board of Supervisors Policy [6.100](#) – Information Security Policy).
- That County Information Assets must not be used for:
 - Any unlawful purpose;
 - Any purpose detrimental to the County or its interests;
 - Personal financial gain;
 - In any way that undermines or interferes with access to or use of County Information Asset for official County purposes;
 - In any way that hinders productivity, efficiency, customer service, or interferes with other County Workforce Members performance of his/her official job duties.
- That records, files, databases, and systems contain restricted, confidential or internal use information (i.e. non-public information) as well as Public information. I may access, read or handle Non-public information to the extent required to perform my assigned duties. Although I may have access to Non-public information, I agree to not access such information unless it is necessary for the performance of my assigned duties.
- Not to divulge, publish, share, expose or otherwise make known to unauthorized persons, organization or the public any County Non-public Information. I understand that:
 - I may divulge Non-public Information to authorized County staff and managers as necessary to perform my job duties;
 - I may divulge Non-public Information to others only if specifically authorized to do so by federal, state, or local statute, regulation or court order, and with the knowledge of my supervisor or manager;
 - I may not discuss Non-public Information outside of the workplace or outside of my usual work area;
 - To consult my supervisor or manager on any questions I may have concerning whether particular information may be disclosed.
- To report any actual breach of Information Security or a situation that could potentially result in a breach, misuse or crime relating to County Information Assets whether this is on my part or on the part of another person following proper County and Departmental procedures. I understand that I am expected to assist in protecting evidence of crimes relating to Information Assets and will follow the instructions of, and cooperate, with management and any investigative response team.
- I have no expectation of privacy concerning my activities related to the use of, or access to, County Information Assets, including anything I create, store, send, or receive using County Information Assets. My actions may be monitored, logged, stored, made public, and are subject to investigation, audit and review without notice or consent.
- Not possess a County Information Asset without authorization. Although I may be granted authorization to possess and use a County Information Asset for the performance of my duties, I will never be granted any ownership or property rights to County Information Assets. All Information

Assets and Information is the property of the County. I must surrender County Information Assets upon request. Any Information Asset retained without authorization will be considered stolen and prosecuted as such.

- Not intentionally, or through negligence, damage or interfere with the operation of County Information Assets.
- Neither, prevent authorized access, nor enable unauthorized access to County Information Assets.
- To not make computer networks or systems available to others unless I have received specific authorization from the Information Owner.
 - Not share my computer identification codes and other authentication mechanisms (e.g., logon identification (ID), computer access codes, account codes, passwords, ID cards/tokens, biometric logons, and smartcards) with any other person or entity. Nor will I keep or maintain any unsecured record of my password(s) to access County Information Assets, whether on paper, in an electronic file.
 - I am accountable for all activities undertaken through my authentication mechanisms (e.g., logon identification (ID), computer access codes, account codes, passwords, ID cards/tokens, biometric logons, and smartcards).
- Not intentionally introduce any malicious software (e.g., computer virus, spyware, worm, key logger, or malicious code), into any County Information Asset or any non-County Information Systems or networks.
- Not subvert or bypass any security measure or system which has been implemented to control or restrict access to County Information Assets and any restricted work areas and facilities.
 - Disable, modify, or delete computer security software (e.g., antivirus, antispyware, firewall, and/or host intrusion prevention software) on County Information Assets. I shall immediately report any indication that a County Information Asset is compromised by malware following proper County and Departmental procedures.
- Not access, create, or distribute (e.g., via email, Instant Messaging or any other means) any offensive materials (e.g., text or images which are defamatory, sexually explicit, racial, harmful, or insensitive) on County Information Assets, unless authorized to do so as a part of my assigned job duties (e.g., law enforcement). I will report any offensive materials observed or received by me on County Information Assets following proper County and Departmental procedures.
- That the Internet is public and uncensored and contains many sites that may be considered offensive in both text and images. I shall use County Internet services in accordance with countywide and Departmental policies and procedures. I understand that County Internet services may be filtered, however, my use of resources provided on the Internet may expose me to offensive materials. I agree to hold County harmless from and against any and all liability and expense should I be inadvertently exposed to such offensive material.
- That County electronic communications (e.g., email, instant messages, etc.) created, sent, and/or stored using County electronic communications services are the property of the County. I will use proper business etiquette when communicating using County electronic communications services.
- Only use County Information Assets to create, exchange, publish, distribute, or disclose in public forums and social media (e.g., blog postings, bulletin boards, chat rooms, Twitter, Instagram, Facebook, MySpace, and other social media services) any information (e.g., personal information, confidential information, political lobbying, religious promotion, and opinions) in accordance with countywide and Departmental policies, standards, and procedures.
- Not store County Non-public Information on any Internet storage site except in accordance with countywide and Departmental policies, standards, and procedures.
- Not copy or otherwise use any copyrighted or other proprietary County Information Assets (e.g., licensed software, documentation, and data), except as permitted by the applicable license

agreement and approved by County Department management. Nor will I use County Information Assets to infringe on copyrighted material.

- That noncompliance may result in disciplinary action (e.g., suspension, discharge, denial of access, and termination of contracts) as well as both civil and criminal penalties and that County may seek all possible legal redress.

I HAVE READ AND UNDERSTAND THE ABOVE AGREEMENT:

_____ County Workforce Member's Name	_____ County Workforce Member's Signature
_____ County Workforce Member's ID Number	_____ Date
_____ Manager's Name	_____ Manager's Signature
_____ Manager's Title	_____ Date

CERTIFICATION FOR MILEAGE REIMBURSEMENT

I. EMPLOYEE AND CERTIFICATION INFORMATION

Employee Name: _____
Employee Number: _____ Dept No. _____
Division/District: _____
Cert Start Date: _____ Cert Stop Date: _____
Certification Type: **M**

II. LOCATION

Location:
(Org Code) _____
Headquarter: Street: _____
City: _____
State: _____ Zip: _____

III. DRIVER'S LICENSE INFORMATION

Driver's License Type: **Class C**
Driver's License Number: _____
Driver's License Expiration Date: _____

IV. AUTHORIZING SIGNATURE

Chief Deputy / Division Chief Signature

Date

COUNTY OF LOS ANGELES
MILEAGE CERTIFICATION

Every employee designated by management to be certified for mileage reimbursement shall complete the appropriate certification forms and obtain a copy of the Department's *Mileage Permittee Self-Insurance Program and Responsibilities* policy. Mileage permittees are expected to adhere to all certification and Mileage Permittee Self-Insurance Program requirements.

ACKNOWLEDGEMENT

I, _____ acknowledge that I have read and received a copy of the document entitled, Information and Instructions for Permittee Drivers, and a copy of the Notice of Self-Insurance. I will notify my supervisor of any change in my driver's license status which would preclude me from driving on County business (e.g., suspended, restricted, or revoked license).

Permittee Signature

Date

Supervisor's Signature

Date

Original Form: Permittee's Personnel File

CERTIFICATION OF RECEIPT

This is to certify that I have read and received a copy of the document entitled, Information and Instructions for Permittee Drivers, and a copy of the County of Los Angeles: Evidence of Financial Responsibility. By signing this Certification, I also agree that:

- I will notify my supervisor of any change in my driver's license status which would preclude me from driving on County business (e.g. suspended, restricted, or revoked license).
- I am not allowed to claim or receive reimbursement for damages both from the County and also from my own private auto liability policy, nor from any other source, including any third party who caused the accident or that party's insurance company.
- In the event I receive reimbursement for damages from another source, including from my own personal auto insurance policy or from a third party or that party's insurance company, that I will return one hundred percent of any County reimbursement I received for the same damage.

MILEAGE PERMITTEE (Print Name)

MILEAGE PERMITTEE (Signature)

DATE

COUNTY OF LOS ANGELES — BOARD OF SUPERVISORS

PROPERTY AND ACCESS CLEARANCE FORM

NAME:

EMPLOYEE NO:

EFFECTIVE DATE:

TITLE:

REASON FOR LEAVING:

DIVISION / DISTRICT:

The items below must be returned to the designated division no later than the employee's last working day. Failure to do so may delay outgoing process, including issuance of final payment.

BUILDING MANAGEMENT	
Office Keys	
Other	
Building Manager Signature/ Date:	

FISCAL SERVICES			
Gasoline Card	Vehicle	Vehicle #	
Telephone Card	Other		
Fiscal Manager Signature/ Date:			

IRM			
Blackberry			Secure ID Card
Laptop/ Home Computer			Flashdrive
iPhone	PIN		
Remain Active	Yes	No	
IRM Manager Signature/ Date:			

CONFLICT \ LOBBYIST			
Leaving Office Form Needed?	Yes	No	
COI \ L Manager Signature/ Date:			

HUMAN RESOURCES			
Identification Badge			Parking Decal
Board Room Badge			Lot 14 Key Card
Elevator / Door Key Card			Other
HR Operations Signature/ Date:			

I certify that all County property that was issued to me has been returned:

Employee Signature

Date

Supervisor/ Manager Signature

Date