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July 21, 2022

VIA EMAIL & CERTIFIED MAIL

Public Records Coordinator
State of California Department of Justice
Office of the Attorney General
P.O. Box 944255
Sacramento, CA 94244
EMAIL: publicrecords@doj.ca.gov

Re: PRAR # 2201038 Requesting Documents from Recent Department of Justice Technology and Access Issues.

To Attorney General Bonta:

This letter constitutes a request under the Public Records Act, California Government Code Section 6250, et seq (the "Act"), and seeks the information listed below, regardless of the medium upon which it is kept.

This request is directed *individually* (1) to each person/entity identified in the addressee section above, and (2) to the Public Records Act Clerk or designee for each entity or person identified in the addressee section above. One or several of the above may respond on behalf of any number of the others; however, each person/entity responding on behalf of another must so state in the response. To the extent that an aggregate responding person/entity fails to identify that such person/entity is responding on behalf of another, we do not waive the right to require a response from each such person/entity from whom we have not received a specific response.

All references to standards for compliance are pursuant to California Government Code Section 6250, et seq., as amended by California Assembly Bill 2799, effective January 1, 2001, and further informed by the heightened right to information as provided by the California Constitution, article 1, section 3, as amended by Proposition 59.

INFORMATION REQUESTED

This request seeks the information listed below, whether in the form of a writing,¹ computer file, photograph, audio or video recording, or however kept, including any writings sent, received, or stored in a personal account.² Please note that public records requests also apply to social media accounts of public officials and public employees where “an employee uses a personal account to communicate about the conduct of public business, the writings may be subject to disclosure under the California Public Records Act.” (*City of San Jose v. Sup. Ct.* (2017) 2 Cal.5th 608, 614-15.)

1. A copy of the 8D Report for the time period of June 26, 2022 to July 1, 2022. The report should be the full report and detail all procedures, steps, processes, and signoffs by supervisors and employees that led to the creation of the DOJ web portal where the recent DOJ Breach of gun owners’ of personal data occurred.
2. A copy of the G.I.T. report as provided to the software repository or the historical record of the code written and tested in the creation of the database which included leaked personal information of gun owners in a format that was downloadable to the public. This report should be inclusive for the period of June 26, 2022 to July 1, 2022
3. All “writings” with the CA DOJ staff and Attorney General and all other persons or groups, or internally with each other, regarding the preparation of the DOJ site where gun owners’ information would be made available, release of personal and confidential information, what went wrong with the release of personal and confidential information, and who is responsible for the leaked information from June 1, 2022 to July 18, 2022.
4. A list of the “internal codes corresponding to statutory reason that a person is prohibited from possessing a firearm,” as noted in the July 8, 2022, letter, paragraph 3, to victims of the DOJ Data Breach of personal and confidential information.

TIME TO RESPOND & COST REIMBURSEMENT

Please review this request in its entirety and include the above reference number in all future correspondence regarding this request. If the items listed above are under the control of another department or agency, please forward this letter accordingly. The Act directs that you provide a response within ten (10) days of your receipt of this letter.

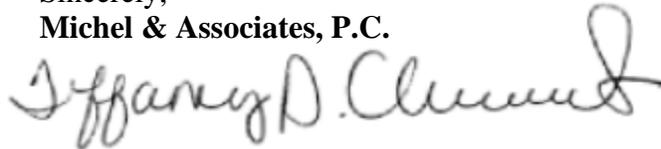
¹ “Writing,” whether singular or plural, includes those items listed in the paragraph above, as well as those items described in the definition provided by Evidence Code section 250, which provides as follows: “ ‘Writing’ means handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.”

² As stated by the California Supreme Court, a government official’s writings about public business are not excluded from production under the Public Records Act “simply because they have been sent, received, or stored in a personal account. *City of San Jose v. Superior Court*, 2 Cal. 5th 608, 629 (2017).

Pursuant to Government Code section 6253(b), we ask that you make the records promptly available by copying and forwarding those records to us. We do not object to the production of documents that have private phone numbers or email addresses redacted. We are willing to pay reasonable costs to reimburse you for direct costs of duplication or statutory fees. If you estimate that the direct copying costs will exceed fifty dollars (\$50.00), please do not begin the process of copying; rather, notify us first of the cost estimate so that we may determine how best to proceed.

Thank you for your cooperation. Please do not hesitate to call if you have questions regarding the foregoing.

Sincerely,
Michel & Associates, P.C.

A handwritten signature in black ink, appearing to read "Tiffany D. Chevront". The signature is fluid and cursive, with a large, stylized initial "T".

Tiffany D. Chevront