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May 26, 2022

VIA U.S. MAIL AND EMAIL

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: Public Records Act Request #2195770-Attorney General Bonta

To Whom It May Concern:

This letter constitutes a request under the Public Records Act, California Government Code § 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. This request will also be submitted via any online portals made for the submission of such requests, if such portals exist.

All references to standards for compliance are pursuant to California Government Code § 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.

If you contend that any portion of the records requested is exempt from disclosure by express provisions of law, Government Code § 6253(a) requires segregation and redaction of that material in order that the remainder of the records may be released. If you contend that any express provision of law exists to exempt from disclosure all or a portion of the records I have requested, Government Code § 6253(c) requires that you notify me of the reasons for the

determination not later than 10 days from your receipt of this request. Government Code §§ 6253(d) & 6255(b) require that any response to this request that includes a determination that the request is denied, in whole or in part, must be in writing and include the name and title of the person(s) responsible for the response.

In responding to this request, please keep in mind that Article 1, § 3(b)(2) of the California Constitution expressly requires you to broadly construe all provisions that further the public's right of access, and to apply any limitations on access as narrowly as possible.

INFORMATION REQUESTED

This request seeks the information listed below, whether in the form of a document, other writing¹, communication², computer file, photograph, audio or video recording, or however kept, including any writings sent, received, or stored in a personal account.³ 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. Any and all documents or writings that constitute communications between Attorney General Rob Bonta (including Attorney General Bonta's staff and DOJ employees) and any law enforcement office, department, or personnel that relate in any way to ghost guns and pre-cursor parts, gun violence, changes to CCW policies, and gun control between the dates of January 1, 2022 and June 1, 2022.
2. Any and all documents or writings that constitute communications between Attorney General Rob Bonta (including Attorney General Bonta's staff and DOJ employees) and the major gun control organizations⁴ between the dates of January 1, 2022, and June 1, 2022. This includes any of their employees, volunteers, or representatives if they were communicating with Attorney General Bonta or the California Department of Justice (DOJ) on behalf of their respective organizations.

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 “Communication”, whether singular or plural, includes but is not limited to any written letter, memorandum, or any other document or writing of any kind transmitted from one person or entity to another person or entity by hand, mail, courier, other delivery service, telecopy, facsimile, telegraph, electronic mail, voicemail, text message, or any other means. “Communication”, whether singular or plural, also includes recordings, notes, or other memorialization of telephone conversations.

³ 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).

⁴ These include the Brady Campaign to Prevent Gun Violence, Everytown for Gun Safety, the Coalition to Stop Gun Violence, Moms Demand Action for Gun Sense in America, Mayors Against Illegal Guns, and Giffords.

3. Any documents or writings that constitute communications within the California DOJ between employees, agents, supervisors, directors, or elected officials that discuss changes to the Certificate of Eligibility issuing staff.
4. Any documents or writings that constitute communications within the California DOJ between employees, agents, supervisors, directors, or elected officials that discuss policy changes to the timing of issuing Certificates of Eligibility.
5. Any documents or writings that constitute communications within the California DOJ between employees, agents, supervisors, directors, or elected officials that discuss changes to the policies and procedures for issuing Certificates of Eligibility and the timing of applications being processed.
6. Any documents or writings that constitute communications within the California DOJ between employees, agents, supervisors, directors, or elected officials that discuss changes in policy of inspections and the intensity of those inspections of Federal Firearm Dealers (FFL).
7. Any documents or writings that constitute communications within the California DOJ between employees, agents, supervisors, directors, or elected officials that discuss the number of days that the average inspection of and FFL should take and the procedure of what DOJ agents must review while completing an inspection of an FFL.
8. Produce the DOJ document that states what are the requirements for what is inspectable during an inspection of an FFL and the procedures that DOJ agents must follow in conducting an inspection.
9. Any and all communications, documents, writings between Attorney General Bonta (including Attorney General Bonta's staff and DOJ employees) and the major gun control organizations⁵ between the dates of June 1, 2021, and June 1, 2022 regarding *NYSRPA v. Bruen*, the Supreme Court decisions on Second Amendment cases, and plans for addressing changes to California law based on ruling from the Supreme Court. This includes any of their employees, volunteers, or representatives if they were communicating with Attorney General Bonta or the California Department of Justice (DOJ) on behalf of their respective organizations.

TIME TO RESPOND & COST REIMBURSEMENT

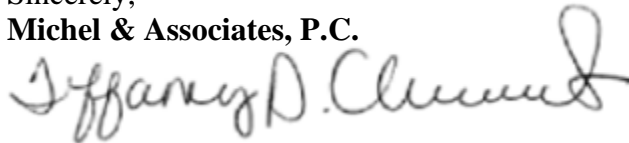
Please review this request in its entirety and include the above reference number in all future correspondence regarding this request. If the items listed above are under the control of another department or agency, please forward this letter accordingly. The Act directs that you provide a response within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

⁵ These include the Brady Campaign to Prevent Gun Violence, Everytown for Gun Safety, the Coalition to Stop Gun Violence, Moms Demand Action for Gun Sense in America, Mayors Against Illegal Guns, and Giffords.

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 written in a cursive style with a large, looping initial "T".

Tiffany D. Chevront