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11 Attorneys for Plaintiff  
12 Deputy District Attorney JANE DOE

13 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 FOR THE COUNTY OF LOS ANGELES

15 STANLEY MOSK COURTHOUSE

16 Deputy District Attorney JANE DOE, an  
17 individual,

18 Plaintiff,

19 v.

20 STATE OF CALIFORNIA; and DOES 1  
21 through 25, inclusive,

22 Defendants.

CASE NO:

COMPLAINT FOR DAMAGES AND  
INJUNCTIVE RELIEF FOR:

- 1) VIOLATION OF CALIFORNIA'S INFORMATION PRIVACY ACT;
- 2) VIOLATION OF RIGHT TO PRIVACY UNDER ARTICLE 1, SECTION 1 OF THE CALIFORNIA CONSTITUTION;
- 3) INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS;
- 4) NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS; AND
- 6) PUBLIC DISCLOSURE OF PRIVATE FACTS

REQUEST FOR TRIAL BY JURY

COMES NOW Plaintiff JANE DOE, who alleges as follows:

INTRODUCTION

1. Plaintiff Deputy District Attorney JANE DOE is a veteran Los Angeles County Deputy District Attorney. In her 23-year career as a crime fighter, she has prosecuted some of the worst criminals, including dozens of murderers, countless members of violent street gangs and other criminal syndicates, and other felons with no regard for human life or civil society.

2. Because of the important role she plays in fighting crime in Los Angeles County, California public policy recognizes the danger she faces in her job. Thus, express public policy

1 has made it illegal for government employees to release personally identifying information about  
2 her and other crime fighters, including judges, law enforcement officers, and other public  
3 officials.

4 3. This public policy underscores the fear that she and others who keep violent  
5 criminals off our streets have to contend with on a daily basis; if her address and other personal  
6 identifying information were released to members of the public, she would be subject to  
7 intimidation, retribution, and violence by the very people she prosecutes or by their criminal  
8 associates.

9 4. Because of the ever-present danger she faces, Plaintiff carries a firearm for  
10 protection under a concealed carry weapons (“CCW”) permit, as do many judges, law  
11 enforcement officers, correctional officers, and other crime fighters.

12 5. As a result of a political stunt by California Attorney General Rob Bonta,  
13 Plaintiff’s and thousands of other crime fighters’ personally identifying information contained in  
14 CCW permit data was publicly released in June. And although the Attorney General has spent the  
15 subsequent months downplaying or flat-out ignoring the harmful effect his stunt had on the lives  
16 of all affected Californians who hold or applied for CCW permits, for crime fighters like Plaintiff,  
17 the danger is acute. She and others like her have had to constantly fear for their lives because  
18 some of the criminals they arrested, testified against, prosecuted, or sentenced now have their  
19 home addresses and other personally identifying information. And given that the Internet is  
20 forever, past and future criminal defendants will have ready access to such information for the  
21 foreseeable future.

22 6. The Attorney General’s Office has gone completely silent on how it plans to  
23 handle this massive privacy breach, including how it is going to protect all of the public officials  
24 it endangered like Plaintiff. This has left local prosecutor’s offices, law enforcement agencies,  
25 and courthouse officials scrambling to find ways to identify their vulnerable employees and figure  
26 out methods to protect them. Having been reasonably patient to see what the Attorney General’s  
27 Office would do to help her and other affected crime fighters, and having watched it do nothing,  
28 Plaintiff is now forced to sue to both prevent another politically motivated leak like this from

1 happening again. She also seeks to compel some action by the state to protect her safety or  
2 otherwise compensate her for having to pay for her own increased security measures to mitigate  
3 the harm caused by the Attorney General's Office.

4 7. And to not compound the injury to her safety any further, Plaintiff seeks to sue  
5 pseudonymously in order to vindicate her privacy rights under California's public policy that  
6 should not have been so callously disregarded by California's top law enforcement agency.

7 JURISDICTION AND VENUE

8 8. This Court has jurisdiction over all causes of action asserted in this Complaint  
9 under Article VI, section 10 of the California Constitution because the causes of action below are  
10 not given by statute to other trial courts or administrative agencies. The amount in controversy  
11 exceeds \$25,000.00.

12 9. The injuries suffered by Plaintiff alleged herein were suffered in Los Angeles  
13 County, California.

14 PARTIES

15 10. Plaintiff Deputy District Attorney JANE DOE was and is a veteran prosecutor for  
16 the County of Los Angeles, as well as resides within the County. She has prosecuted hundreds of  
17 felony cases, including dozens of murder cases and cases where the death penalty was sought and  
18 imposed. She has imprisoned members of criminal syndicates and violent repeat offenders. At  
19 the time her injuries first began, she held a CCW permit.

20 11. Defendant the STATE OF CALIFORNIA (the "State") is the sovereign  
21 government of California. Among its executive offices is the Office of the Attorney General,  
22 over which Attorney General Rob Bonta presides as the chief law enforcement officer of the  
23 State. Included within the Office of the Attorney General is the California Department of Justice,  
24 which is responsible, *inter alia*, for maintaining data and information regarding CCW permit  
25 holders, including private, personally identifiable information, as well as enforcing laws relating  
26 to firearms generally and CCW permit holders specifically. Defendant State has offices within  
27 Los Angeles County, including offices of the Department of Justice.

28 12. Plaintiff is informed and believes, and on that basis alleges, that at all times

1 mentioned herein, defendants named or fictitiously designated, and each of them, were the agents,  
2 servants, employees or joint venturers of the other defendants, and each of them, and were, at all  
3 mentioned times, acting within the course and scope of such agency, employment, or joint venture  
4 relationship.

5 13. Plaintiff is informed and believes, and upon such information and belief, alleges  
6 that each of the defendants named herein as DOES 1 through 25, were employees of Defendant  
7 State who were responsible for, either intentionally or negligently, in the public release of  
8 Plaintiff's and other CCW permit holders' private identifying information. Thus, on information  
9 and belief, DOES 1 through 25, and each of them, are in some manner negligent or otherwise  
10 tortiously or statutorily responsible for the injuries hereinafter alleged. Plaintiff does not  
11 presently know the true names and capacities of the defendants sued herein as DOES 1 through  
12 25. Plaintiff will seek leave of the Court to amend the complaint to allege DOE defendants' true  
13 names and capacities once Plaintiff ascertains them.

14 ALLEGATIONS APPLICABLE TO ALL CAUSES OF ACTION

15 14. In June 2022, the United States Supreme Court issued its landmark *New York State*  
16 *Rifle & Pistol Association, Inc. v. Bruen* decision, which reaffirmed an individual's right to carry  
17 a firearm in public for self-defense.

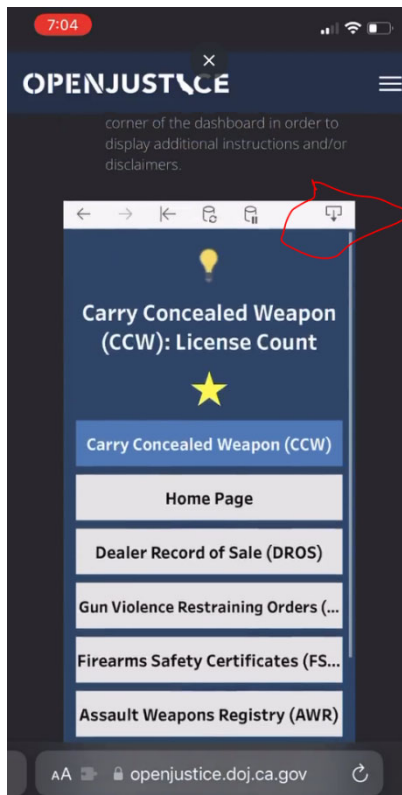
18 15. California's Executive and Legislative branches, including Attorney General  
19 Bonta, were incensed by the decision. They issued press releases decrying the decision and  
20 issued a flurry of legislation designed to water down or make the exercise of the right to carry a  
21 weapon for self-defense a nullity.

22 16. For his part, Attorney General Bonta issued a press release four days after the  
23 *Bruen* decision announcing that the Department of Justice would be hosting and publishing a web  
24 portal filled with CCW permit holders' data. The announced purpose of the web portal was to  
25 provide an interactive and easily searchable user experience that would promote public access to  
26 information about the holders of CCW permits, the issuance of gun violence restraining orders,  
27 and other information related to firearms laws in California. The stated goal of publishing this  
28 information was to increase "transparency" and "public trust." The real reason was that the

1 Attorney General wanted to be seen as “doing something” immediately following a Supreme  
2 Court decision that was anathema to the firearms views of Bonta and other politicians in  
3 Sacramento.

4 17. Thus, on the same day Bonta made his announcement—June 27, 2022—the  
5 Department of Justice took the firearms data web portal live. The information was published at  
6 <<https://openjustice.doj.ca.gov/>>.

7 18. From the moment the portal launched, any member of the public who accessed it  
8 was able to download the portal’s underlying data in the form of Excel spreadsheets. This was not  
9 a flaw or a bug, but a feature. For example, if someone clicked on the download icon located at  
10 the top right-hand side of the portal, it would download onto the user’s computer an electronic  
11 spreadsheet file of whatever data had been selected. Thus, when a member of the public chose to  
12 download CCW permit holder information, the portal allowed such data to be downloaded in an  
13 electronic spreadsheet containing information about CCW permit holders and applicants for a  
14 particular county or in an electronic spreadsheet containing such information about holders and  
15 applicants for the entire state.



1           19.     The information about CCW permit holders and applicants that could be  
2 downloaded by the public from the portal on a county-by-county or a statewide basis included  
3 each CCW permit holder’s or applicant’s name, contained in a line item along with:

- 4           a.     Their address;
- 5           b.     Their date of birth;
- 6           c.     Their gender;
- 7           d.     Their CCW License Number;
- 8           e.     The issue dates of their permit;
- 9           f.     Their DOJ-assigned Criminal Identification and Information (CII) Number;
- 10          g.     The type of CCW permit they were issued or applied for. This included the  
11                categories “judge,” “custodial officer,” “reserve officer,” “place of  
12                employment,” or “standard”; and
- 13          h.     The status of their license.

14           20.     During the afternoon and evening of June 27, 2022, information began  
15 disseminating on Internet message boards and on social media about the private information that  
16 was being made available on the portal. People on social media began tagging the Attorney  
17 General’s verified Twitter account asking for him to respond to the situation. During the evening  
18 of June 27<sup>th</sup>, the portal was taken offline, but it inexplicably went back online again. When it  
19 went online the second time on the evening of the 27<sup>th</sup>, the download icon was no longer present  
20 on the portal. Yet the issue of the availability of private information was still not resolved, as data  
21 could still be accessed for each individual county by hovering over it and clicking another icon to  
22 access the underlying spreadsheet.

23           21.     The Department of Justice did not permanently take down the portal until the  
24 morning of June 28, 2022, after it had been publishing private CCW permit holders’ personal  
25 information, including Plaintiff’s, for well over twelve hours. As of the afternoon of June 28,  
26 2022, the Portal’s site read “Website temporarily unavailable - Please try again in a few minutes.”

27           22.     On the afternoon of June 28<sup>th</sup>, the Attorney General’s Office issued a press release  
28 stating “We are investigating an exposure of individuals’ personal information connected to the

1 DOJ Firearms Dashboard. Any unauthorized release of personal information is unacceptable. We  
2 are working swiftly to address this situation and will provide additional information as soon as  
3 possible.”

4 23. As communicated by the Fresno County Sheriff’s Office and in subsequent  
5 Department of Justice correspondence, the Department of Justice began immediately  
6 mischaracterizing the June 27-28 publication of the web portal as a “breach.”



7  
8  
9 DOJ Data Breach Exposes Personal Information of California CCW Holders

10 On Tuesday, the California State Sheriff's Association (CSSA) informed our office that the  
11 California Department of Justice (DOJ) had suffered a data breach. This occurred as part of the  
12 DOJ's launch of its "2022 Firearms Dashboard Portal." This public site allows access to certain  
13 information, however, personal information of Concealed Carry Weapon (CCW) permit holders is  
14 not supposed to be visible. This includes, but is not limited to a person's name, age, address,  
15 Criminal Identification Index (CII) number and license type (Standard, Judicial, Reserve and  
16 Custodial). This pertains to all California CCW holders, including Fresno County residents.

17 After learning of the breach, the DOJ pulled down the dashboard site along with all related links.  
18 However, portions of private information may have been posted on social media websites. It is  
19 unknown exactly how much time the information was accessible.

20 The State Attorney General's Office has stated it is working with urgency to determine the scope  
21 of the breach. It plans to contact CCW holders directly to advise them of the breach and will  
22 institute a program to reduce any harm or damages to CCW holders that resulted from the  
23 breach.

24 The Fresno County Sheriff's Office is urging anyone who learns their identity was compromised as  
25 a result of this data breach to please make an online report by visiting  
26 <https://www.fresnosheriff.org/report-a-crime-online.html>



27 *(Screenshot of the Fresno County Sheriff's Twitter feed of a tweet made on June 28, 2022)*

28 24. Despite the Orwellian attempt to characterize the Department of Justice’s

1 intentional publication of the information as a “breach,” it was patent that the Department of  
2 Justice *twice* intentionally took the web portal live and published the information. Thus, far from  
3 being a “hack” or “breach” of the Department of Justice’s servers as they attempted to  
4 characterize it, the publication of the CCW permit holders’ personal information—and the  
5 functionality allowing members of the public to download or access that information—was a  
6 deliberate act by the Department of Justice. Nobody stole a password and nobody found a  
7 backdoor into a server as Attorney General Bonta would like the public to believe. Rather, in a  
8 cynical attempt to publicly appear to be on the “right side” of a political debate following a  
9 controversial court decision, the Attorney General and DOES 1 through 25 made a deliberate  
10 decision to publish the data which included private or personal identifying information. The only  
11 fact that is unknown is whether the decision to include all CCW permit holders’ and applicants’  
12 home address, date of birth, and CII information on the portal was itself deliberate or accidental.  
13 So too, it is unknown whether to include any information about prosecutors, judges, and law  
14 enforcement officers was also deliberate or accidental.

15         25. Plaintiff has faithfully served the people of the State for almost a quarter of a  
16 century. Like many crime fighters and other public servants, she willingly entered into such  
17 service relying upon the express and implied promises made in California public policy to protect  
18 from disclosure the private, personal identifying information collected by the State and its  
19 subdivisions from judges, prosecutors, and correctional and law enforcement officers. If she  
20 protected the State, the State promised to protect her and her family. Yet, here it absolutely  
21 failed, and, through Bonta’s subsequent inaction, ran away from any effort to fulfill its promise.

22         26. Among the express public policies forbidding the disclosure of Plaintiff’s and  
23 other public officials’ information by the State to the public are Civil Code section 1798, et seq.  
24 (the “Information Practices Act”) and Government Code section 6254.21. Among the implied  
25 policies preventing such disclosure are the right of privacy recognized under Article I, section 1 of  
26 the California Constitution, Government Code section 6254(u)’s exception from the Public  
27 Records Act of the release of prosecutors’ and other public servants’ CCW permit information in  
28 response to a Public Records Act request, and the Penal Code prohibition against public release of



1 individuals' CII information under Penal Code sections 11076 and 13201.

2 27. Plaintiff is an appointed official within the meaning of Government Code section  
3 6254.1(f).

4 28. Plaintiff's private, personal, and protected information was included in the June  
5 27-28 publication on the web portal, including her home address, date of birth, and CII Number.  
6 As a faithful servant of the people, Plaintiff neither consented to nor did she ever expect the  
7 State's chief law enforcement officer or its chief law enforcement agency to publicly publish her  
8 personal information, including her home address and date of birth derived from her CCW permit  
9 application. Notwithstanding the political motivations behind the Attorney General's publication  
10 of the web portal, she did expect that once he understood that his decision to publish the portal  
11 had endangered the safety of thousands of public servants like her, Bonta would take swift action  
12 to protect them. He shockingly has not, and as a result, Plaintiff sues for and is entitled to the  
13 relief set forth in the causes of action below.

14 29. Plaintiff certainly did not give her written consent to have her home address posted  
15 on the Internet.

16 30. For those claims and causes of action where it is required, Plaintiff has complied  
17 with all administrative prerequisites to bringing suit, including the claims presentment  
18 requirements of the Government Claims Act, except that for those individuals sued fictitiously  
19 herein, she has been unable to identify them in any claims presentment due to the Attorney  
20 General's lack of transparency or follow-through regarding the investigation he has purported to  
21 undertake into the publication of the web portal.

22 FIRST CAUSE OF ACTION

23 Violation of California's Information Privacy Act (Civil Code section 1798, et seq.)

24 Against Defendant State of California and DOES 1 through 25

25 31. Plaintiff incorporates and realleges Paragraphs 1 through 30 as if fully set forth  
26 herein.

27 32. On June 27 and 28, 2022, Defendants, and each of them, disclosed or caused to be  
28 disclosed to the public the personal information of Plaintiff as described hereinabove, including

1 information protected under Section 1798.3.

2 33. On information and belief, thousands of individuals downloaded spreadsheets  
3 generated by the State's web portal containing Plaintiff's personal information.

4 34. As a result of the disclosure of the information, Plaintiff has been injured in her  
5 emotional health and her physical safety and has expended or will have to expend significant  
6 amounts to safeguard herself and her family.

7 35. As a result of the disclosures and the injuries resulting therefrom, Plaintiff is  
8 entitled to an injunction preventing further disclosure of her information by Defendants and each  
9 of them.

10 36. As a result of the disclosures and the injuries resulting therefrom, Plaintiff is  
11 entitled to monetary damages from Defendants, and each of them, for general and special  
12 damages, all in an amount according to proof, but no less than the jurisdictional minimum of this  
13 Court.

14 SECOND CAUSE OF ACTION

15 Violation of Article I, section 1 of the California Constitution

16 Against Defendant State of California and DOES 1 through 25

17 37. Plaintiffs incorporate and reallege Paragraphs 1 through 30 as if fully set forth  
18 herein.

19 38. On June 27 and 28, 2022, Defendants, and each of them, disclosed or caused to be  
20 disclosed to the public the private information of Plaintiff as described hereinabove, including  
21 information protected under the implied right of privacy recognized in Article I, section 1 of the  
22 California Constitution.

23 39. At the time Defendants caused to be disseminated Plaintiff's private information,  
24 Plaintiff had a privacy interest in her home address, her date of birth, and her CII information, as  
25 evidenced by the public policies recognizing such interests set forth in Government Code section  
26 6254(u), Penal Code sections 11076 and 13201, and Vehicle Code section 1808.21.

27 40. At the time Defendants disseminated or caused to be disseminated Plaintiff's  
28 private information, Plaintiff had a reasonable expectation, based on the aforementioned public

1 policies and her inclusion in the class of persons to be protected under those policies, that the  
2 information would be kept private and not disseminated by Defendants.

3 41. As the Attorney General himself has represented in writing, the dissemination of  
4 Plaintiff's and other CCW permit holders' information was a serious invasion of their privacy. It  
5 was so serious as to cause Plaintiff to fear for her life and for the life of her family members.

6 42. As a result of the disclosure of the information, Plaintiff has been injured in her  
7 emotional health and her physical safety and has expended or will have to expend significant  
8 amounts to safeguard herself and her family.

9 43. As a result of the disclosures and the injuries resulting therefrom, Plaintiff is  
10 entitled to monetary damages for general and special damages, all in an amount according to  
11 proof, but no less than the jurisdictional minimum of this Court.

12 44. Where any DOE Defendant is proven to have acted in a capacity other than his or  
13 her capacity as an employee or official of Defendant State or any of its departments or  
14 subdivisions, Plaintiff is entitled, in addition to other damages and remedies sought against  
15 Defendants, for an award of exemplary damages from such DOE or DOES under Civil Code  
16 section 1798.53.

### 17 THIRD CAUSE OF ACTION

#### 18 Intentional Infliction of Emotional Distress

19 Against Defendant State of California and DOES 1 through 25

20 45. Plaintiff incorporates and realleges Paragraphs 1 through 30 as if fully set forth  
21 herein.

22 45. Under California Government Code section 820(a), Defendants, and each of them,  
23 are liable for injuries caused by their acts or omissions to the same extent as a private person.

24 46. Under California Government Code sections 815.2 and 815.4, the State of  
25 California is liable for injuries proximately caused by acts or omission of its employees and  
26 independent contractors within the scope of their employment or contracted work. Upon  
27 information and belief, at all times material to this complaint, the Doe Defendants were employed  
28 by, or were independent contractors for, the State of California and were under the State's

1 direction and control when they engaged in the conduct described herein. Because the acts of  
2 these Doe Defendants were committed within the course of their employment and/or independent  
3 contractor relationship with the State of California, the State of California is therefore liable for  
4 their intentionally wrongful conduct described herein.

5 47. Defendants' release of the confidential name and home address information of  
6 CCW permit holders, such as Plaintiff, onto the open internet with no access restrictions  
7 whatsoever, is outrageous conduct.

8 48. Defendants' outrageous conduct was intended to cause the CCW permit holders  
9 whose information was exposed, such as Plaintiff, emotional distress, and/or acted with reckless  
10 disregard for whether emotional distress could result from the release of the information.

11 49. Plaintiff has experienced and continues to experience emotional distress, including  
12 but not limited to nervousness, anxiety, and worry, because of Defendants' release of her home  
13 address information to the open internet.

14 50. Defendants' conduct in releasing Plaintiff's home address information was a  
15 substantial factor in causing Plaintiff severe and ongoing emotional distress, including but not  
16 limited to nervousness, anxiety, and worry.

17 FOURTH CAUSE OF ACTION

18 Negligent Infliction of Emotional Distress

19 Against Defendant State of California and DOES 1 through 25

20 51. Plaintiff incorporates and realleges Paragraphs 1 through 30 as if fully set forth  
21 herein.

22 52. Under California Government Code section 820(a), Defendants, and each of them,  
23 are liable for injuries caused by their acts or omissions to the same extent as a private person.

24 53. Under California Government Code sections 815.2 and 815.4, the State of  
25 California is liable for injuries proximately caused by acts or omission of its employees and  
26 independent contractors within the scope of their employment or contracted work. Upon  
27 information and belief, at all times material to this complaint, DOE Defendants were employed  
28 by, or were independent contractors for, the State of California and were under the State's

1 direction and control when they engaged in the conduct described herein. Because the acts of  
2 these DOE Defendants were committed within the course of their employment and/or  
3 independent contractor relationship with the State of California, the State of California is  
4 therefore liable for their negligent conduct described herein.

5 54. The State of California and DOE Defendants were under a duty, given their access  
6 to the sensitive and confidential home address information pertaining to deputy District Attorney  
7 CCW permit holders including Plaintiff, to be careful with that information, to protect its  
8 confidentiality, and at minimum to ensure that it is not published to the entire world through the  
9 open internet with no access restrictions. The public policy establishing the sensitivity of such  
10 information and the need for those who have access to it to avoid its disclosure is well established  
11 and clear. The relationship between Defendants, as possessors of that information, and Plaintiff is  
12 therefore clearly established.

13 55. The State of California and DOE Defendants' posting of the home address  
14 information of CCW permit holders, including Plaintiff's, on the open internet with no access  
15 restrictions was a breach of that duty.

16 56. Due to the State of California and DOE Defendants' actions in publishing  
17 Plaintiff's home address information onto the open internet with no access restrictions, Plaintiff  
18 suffered and continues to suffer serious emotional distress, including but not limited to anxiety,  
19 nervousness, and worry.

20 57. The State of California and DOE Defendants' actions in publishing Plaintiff's  
21 home address information onto the open internet with no access restrictions was a substantial  
22 factor in causing Plaintiff to suffer serious and ongoing emotional distress including but not  
23 limited to nervousness, anxiety, and worry.

24 SIXTH CAUSE OF ACTION

25 Public Disclosure of Private Facts

26 Against Defendant State of California and DOES 1 through 25

27 58. Plaintiffs incorporate and reallege Paragraphs 1 through 30 as if fully set forth  
28 herein.



1 minimum of this Court;

2 2 For exemplary damages where allowed under statute;

3 3. For preliminary and permanent injunctive relief to prevent the further  
4 dissemination or publication of Plaintiff's home address, date of birth, or CII Number by  
5 Defendants or any of them, on the web portal or any other publicly accessible database  
6 maintained by the State or any of its departments or subdivisions;

7 4. For a declaration by the Court under Code of Civil Procedure section 1060 as to  
8 the rights, responsibilities, and obligations of Plaintiff and Defendants to one another, and each of  
9 them, including, specifically, as to the obligation of Defendants to safeguard and refrain from  
10 publicly disclosing information obtained or kept by Defendants as a result of Plaintiff's  
11 application for or holding of a CCW permit, including specifically, the home address, date of  
12 birth, and CII information contained therein, and for any other declarations and orders necessary  
13 to effect a remedy sought or available under the causes of action pled hereinabove;

14 5. For attorney's fees as allowed by statute;

15 6. For an award of interest, including prejudgment interest, at the legal rate as  
16 permitted by law; and

17 7. For such other and further relief as the court may deem proper.

18 PLAINTIFF FURTHER REQUESTS A TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

19 Dated: [REDACTED], 2022

MICHEL & ASSOCIATES, P.C.

21 \_\_\_\_\_  
22 C. D. Michel  
23 Joshua Robert Dale  
24 Konstadinos T. Moros  
25 Attorneys for Plaintiff  
26 Deputy District Attorney JANE DOE  
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