

CLAIMANT INFORMATION

LAST NAME [REDACTED]		FIRST NAME [REDACTED]		MIDDLE INITIAL [REDACTED]
INMATE OR PATIENT IDENTIFICATION NUMBER (if applicable)		BUSINESS NAME(if applicable)		
TELEPHONE NUMBER [REDACTED]		EMAIL ADDRESS [REDACTED]		
MAILING ADDRESS [REDACTED]		CITY [REDACTED]	STATE CA	ZIP [REDACTED]
IS THE CLAIMANT UNDER 18 YEARS OF AGE? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		INSURED NAME(Insurance Company Subrogation)		
IS THIS AN AMENDMENT TO A PREVIOUSLY EXISTING CLAIM? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		EXISTING CLAIM NUMBER (if applicable)	EXISTING CLAIMANT NAME(if applicable)	

ATTORNEY OR REPRESENTATIVE INFORMATION

LAST NAME [REDACTED]		FIRST NAME [REDACTED]		MIDDLE INITIAL [REDACTED]
TELEPHONE NUMBER [REDACTED]		EMAIL ADDRESS [REDACTED]		
MAILING ADDRESS [REDACTED]		CITY [REDACTED]	STATE [REDACTED]	ZIP [REDACTED]

CLAIM INFORMATION

STATE AGENCIES OR EMPLOYEES AGAINST WHOM THE CLAIM IS FILED Attorney General Robert Bonta; Unknown Doe Employees at California Department of Justice	DATE OF INCIDENT June 27-28, 2022
LATE CLAIM EXPLANATION (Required, if incident was more than six months ago)	

DOLLAR AMOUNT OF CLAIM \$2 million	CIVIL CASE TYPE(Required, if amount is more than \$10,000) <input type="checkbox"/> Limited (\$25,000 or less) <input checked="" type="checkbox"/> Non-Limited (over \$25,000)
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DOLLAR AMOUNT EXPLANATION
 Damages for emotional distress, credit monitoring, and costs of security services to protect Claimant from convicts and arrestees.

INCIDENT LOCATION
 Statewide, but specific to this claimant, in [REDACTED]

SPECIFIC DAMAGE OR INJURY DESCRIPTION
 Claimant is a prosecutor and a public official subject to protection under state law and whose personal information was collected by the DOJ and subject to protection under state law. In conjunction with Claimant applying for and holding a concealed carry weapons permit, Claimant provided and DOJ kept private information of Claimant, as recognized under Article I, Section 1 of the California Constitution and other state laws. By releasing Claimant's personal information to the public in a downloadable spreadsheet, the state actors violated Government Code section 6254(j), Penal Code sections 11076 and 13201, Vehicle Code section 180821, California's Information Practices Act of 1977, and Claimant's right to privacy in such information under Article I, Section 1 of the California Constitution. Plaintiff now fears violence and retribution from convicts and arrestees she prosecuted, and suffers emotional distress. To protect herself from the threat of violence, she must pay for a security service. She also fears the reasonably foreseeable theft of her identity as a result of the publication of her personal information. Other monetary damages are statutorily mandated under the IPA. (See attachment for additional description)

CIRCUMSTANCES THAT LED TO DAMAGE OR INJURY
 AG Bonta and the Department of Justice published and released Claimant's birthdate, home address information, CII number and other personal information as part of a website published by the DOJ on June 27 and 28, 2022. As a result, convicts and arrestees who were prosecuted by Claimant now have her home address information, and she fears for her life. Additionally, thieves now have knowledge of where she keeps a firearm. Further, the trove of personal information is not readily compiled in one publicly-disseminated spreadsheet due to the increased probability that such information could be used for identity theft. Now identity thieves have access to a spreadsheet with Claimant's personal information to commit identity theft against her. (See attachment for additional description)

EXPLAIN WHY YOU BELIEVE THE STATE IS RESPONSIBLE FOR THE DAMAGE OR INJURY
 The Attorney General ordered unknown Doe employees at DOJ to publish and release Claimant's and other prosecutors' CCW information. As a result of the release of CCW information, the protected personal information of Claimant, and the fact that she owns a firearm, was publicly released and disseminated. AG Bonta indicated his intention to release Claimant's and other CCW holders' information in his June 27, 2022 press release announcing the public availability of such information for "research purposes" and "public transparency." In accordance with that press release, on that date, the information was released and disseminated to the public on a website hosted by DOJ. The release was also a per se violation of Government Code section 6254.21(c)(2), giving rise to a cause of action against Defendants. As a result of the release, the statutes and constitutional privacy rights identified above were violated. (See attachment for additional description)

AUTOMOBILE CLAIM INFORMATION		
DOES THE CLAIM INVOLVE A STATE VEHICLE? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	VEHICLE LICENSE NUMBER (if known)	STATE DRIVER NAME (if known)
HAS A CLAIM BEEN FILED WITH YOUR INSURANCE CARRIER? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	INSURANCE CARRIER NAME	INSURANCE CLAIM NUMBER
HAVE YOU RECEIVED AN INSURANCE PAYMENT FOR THIS DAMAGE OR INJURY? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AMOUNT RECEIVED (if any)	AMOUNT OF DEDUCTIBLE (if any)

NOTICE AND SIGNATURE

I declare under penalty of perjury under the laws of the State of California that all the information I have provided is true and correct to the best of my information and belief. I further understand that if I have provided information that is false, intentionally incomplete, or misleading I may be charged with a felony punishable by up to four years in state prison and/or a fine of up to \$10,000 (Penal Code section 72).

SIGNATURE [REDACTED]	PRINTED NAME [REDACTED]	DATE / / [REDACTED]
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INSTRUCTIONS

- Include a check or money order for \$25, payable to the State of California.
 - \$25 filing fee is not required for amendments to existing claims.
- Confirm all sections relating to this claim are complete and the form is signed.
- Attach copies of any documentation that supports your claim. Do not submit originals.

Mail the claim form and all attachments to:
 Office of Risk and Insurance Management
 Government Claims Program
 P.O. Box 989052, MS414
 West Sacramento, CA 95798-9052

Claim forms can also be delivered to:
 Office of Risk and Insurance Management
 Government Claims Program
 707 3rd Street, 1st Floor
 West Sacramento, CA 95605
 1-800-955-0045

Department of General Services Privacy Notice on Information Collection

This notice is provided pursuant to the Information Practices Act of 1977, California Civil Code Sections 1798.17 & 1798.24 and the Federal Privacy Act (Public Law 93-579).

The Department of General Services (DGS), Office of Risk and Insurance Management (ORIM), is requesting the information specified on this form pursuant to Government Code Section 905.2(c).

The principal purpose for requesting this data is to process claims against the state. The information provided will/may be disclosed to a person, or to another agency where the transfer is necessary for the transferee-agency to perform its constitutional or statutory duties, and the use is compatible with a purpose for which the information was collected and the use or transfer is accounted for in accordance with California Civil Code Section 1798.25.

Individuals should not provide personal information that is not requested.

The submission of all information requested is mandatory unless otherwise noted. If you fail to provide the information requested to DGS, or if the information provided is deemed incomplete or unreadable, this may result in a delay in processing.

Department Privacy Policy
 The information collected by DGS is subject to the limitations in the Information Practices Act of 1977 and state policy ([see State Administrative Manual 5310-5310.7](#)). For more information on how we care for your personal information, please read the [DGS Privacy Policy](#).

Access to Your Information
 ORIM is responsible for maintaining collected records and retaining them for 5 years. You have a right to access records containing personal information maintained by the state entity. To request access, contact:

DGSORIM
Public Records Officer
 707 3rd St., West Sacramento, CA 95605
 (916) 376-5300

ATTACHMENT OF CLAIMANT [REDACTED]
TO GOVERNMENT CLAIM FORM (DGS ORIM 006)

SPECIFIC DAMAGE OR INJURY DESCRIPTION (CONT.):

Additional claims and injuries arising from the release of Claimant's information include Intentional Infliction of Emotional Distress and Negligent Infliction of Emotional Distress for having intentionally, recklessly, or negligently published information that puts Claimant in fear of criminals targeting Claimant at Claimant's home, stealing Claimant's firearm, and causing Claimant bodily harm, as well as the release of private information that putting Claimant in fear of identity theft. Additionally, the publication of Claimant's information has caused private facts of Claimant to become public knowledge, including Claimant's name, birthdate, address, and the fact that Claimant owns and carries a firearm, as well as stores a firearm at Claimant's now-disclosed resident address which could be targeted for theft. These private facts were caused to become public knowledge without Claimant's permission, and after Claimant was reassured that in collecting Claimant's information for purposes of issuing Claimant a CCW permit, that such information would be safeguarded and not released to the public. Further, to the same extent that the release of Claimant's personal information violated the right to privacy recognized under the California Constitution, it also violated the right to privacy under the U.S. Constitution recognized under the Fourteenth Amendment, and the common law right to privacy recognized under California law.

CIRCUMSTANCES THAT LED TO INJURY (CONT.):

Either the DOJ itself, through its unknown Doe employees, or the DOJ's unknown Internet Technology private contractor Does negligently or intentionally published the spreadsheet with Claimant's private information arising from Claimant's CCW permit application and/or issued license on June 27-28, 2022. As a result, these spreadsheets were directly downloaded from the DOJ's website by many unknown members of the public. The spreadsheets with Claimant's private information were also shared on publicly-accessible internet forums and website. On information and belief, these spreadsheets, and the individual private information contained in them, including that of Claimant's, continue to be disseminated publicly as a result of the spreadsheet's release by DOJ or unknown Does.

EXPLAIN WHY YOU BELIEVE THE STATE IS RESPONSIBLE (CONT.):

DOJ, either through its unknown Doe employees, or the DOJ's unknown Internet Technology private contractor Does negligently or intentionally published the spreadsheet with Claimant's private information on June 27-28, 2022. No hacking or breach of the DOJ's website occurred, and the dissemination of the spreadsheets by DOJ was an intentional act in furtherance of AG Bonta's stated goal in his June 27, 2022 press release of providing to the public CCW information like the disseminated private information.