

Anonymous

vs

Police Commission, President Robert Hirsch,
Damail Taylor, Petra DeJesus, Thomas
Mazzucco, John Hamasaki, Cindy Elias,
DionJay Brookter, Sgt. Jayme Campbell

Sunshine Ordinance petition and complaint

November 8, 2019

SOTF - it is believed you have jurisdiction over all parts of this complaint under SFAC 67.21(e) and 67.30

Supervisor of Records - although your jurisdiction is narrower, in this case it is believed you have jurisdiction over all parts of this petition under SFAC 67.21(d)

- Allegations:
 - SFAC 67.21(b), 67.21(k), CPRA Gov Code 6253(c) - failure to respond in a complete manner to a records request
 - 67.26 - withholding more than the minimum exempt records or portions of records
 - 67.27 - failure to justify withholding
 - 67.21(k), CPRA Gov Code 6253(b) - failure to provide exact copies of records
 - 67.21(k), CPRA Gov Code 6254.3(b)(1) - withholding of personal email addresses of public employees used to conduct public business
- Complainant: Anonymous (80239-52834911@requests.muckrock.com)
- Respondent Depts: Police Commission
- Respondent Individuals:
 - President Robert Hirsch (department head; custodian of his govt records and personal property)
 - Damail Taylor, Petra DeJesus, Thomas Mazzucco, John Hamasaki, Cindy Elias, DionJay Brookter (custodians of their govt records and personal property)
 - Sgt. Jayme Campbell (actual person providing records)
- Email Metadata is **not** at issue in this complaint - but may be filed later as a separate complaint.
- I am not a representative of MuckRock News; I am merely an anonymous user of MuckRock.com's FOIA service.

This complaint arises out of request(s) made by me to Respondents (appendix B):

- Sept. 11, 2019 - for various records re: the Adachi and Carmody incidents from each named individual

Examples of violations are provided as record numbers with reference to Appendix A where responsive records are listed.

Please issue a written determination that all or some of the records not yet produced in response to these requests are public, and that the respondents violated one or more of the following.

1. Violations of 67.26, 67.27, 67.21(k), Gov Code 6254.3(b)(1) - improper and unjustified withholding

Please determine the below are public records or parts of records and order them disclosed, and find associated violations. I cannot know all possible redactions, so I list examples and ask the City to turn over all parts of records of the same type. The allegations below are not about metadata; they are normally visible parts of the record intentionally redacted or cropped out in the image or PDF. No justifications were provided.

- 1.1. “Hamasaki - Responsive 18” and “Hamasaki - Responsive 19” clearly exist but have been withheld in entirety without justification.
- 1.2. Records 56a, 56b, 57b, 57c, 70b, 70c (see Appendix A for record numbering) entirely blacked out - these records must be provided, and only specific exempt parts may be blacked out. Remember: Public interest balancing exemption is prohibited and the draft exemption is much narrowed in SF.
- 1.3. Records 56d, 58c, 58d, 67b, 67g, 67h, 75b, 75c, 75d fully withheld, including their names (but 56d’s name is also at the bottom unredacted in pg 1 of Record 56)
- 1.4. Records 58e, 67i, 67c, 75e fully withheld (but names provided).
- 1.5. Records 1 and 2 withheld at the top of the record the name of the other party in the communication. See Record 3 for how these types of records should be properly produced. No justification for cropping off that part of the record was provided (the name of the recipient of the text, which is visible on the face of the record).
- 1.6. Record 5, redaction 1 (all redactions numbered from top of page down), unknown what is being redacted
- 1.7. Record 6, all redactions of *business* physical addresses
- 1.8. Record 7, all redactions of names *and* email addresses
- 1.9. Record 9, all redactions appear to be city/govt phone numbers, not personal phone numbers
- 1.10. Record 18, redaction 1 - city email address (it was disclosed in Record 89)
- 1.11. Record 20, all redactions are disputed. Most of the message content is redacted.
- 1.12. Record 21, pg 1, redaction 1 - Name of recipient withheld
- 1.13. Record 23, pg 2, redaction 2 - Mayor Breed’s email address cannot be withheld (if personal, see Gov Code 6254.3(b)(1))
- 1.14. Record 24
 - 1.14.1. Pg 1, redactions 2, 3, 4, 6, 7 and other similar instances of redacted persons names, City emails, and personal emails of City persons using them for business purpose (see Gov Code 6254.3(b)(1))
 - 1.14.2. Pg 4, redaction 1
- 1.15. Record 25, pg 1, redaction 1

- 1.16. Record 29, pg 3, redaction 1 - A commissioner's last name
- 1.17. Record 32, pg 1, redactions 1, 6, and 7 - Full names (not just email addresses)
- 1.18. Record 34, pg 2, redactions 3 (see #1.14 above) and 4 (full name)
- 1.19. Record 37, all redactions are disputed. Most of the message content is redacted.
- 1.20. Record 48, pg 1, redaction 2, city email address
- 1.21. Record 56c, pg 3, redaction 1 - description of closed session meeting
- 1.22. Record 57, pg 1, redactions 1,2,3,4,5
- 1.23. Record 62, 63, 66, 67, 69, 72 - all redactions (email recipients)
- 1.24. Record 70a, all redactions - description of closed session meeting
- 1.25. Record 75, all email contents deleted for unknown reason (not redacted, just deleted)
- 1.26. Record 75a, all redactions - description of closed session meeting
- 1.27. Record 83, pg 1, redaction 1 - email recipient
- 1.28. Record 90, all redactions
- 1.29. Record 95, all redactions (see Gov Code 6254.3(b)(1))
- 1.30. Record 96, all redactions, (see Gov Code 6254.3(b)(1)) and also some is business info not personal
- 1.31. Two copies of Records 98 and 100-111 were provided, one with redactions and one without. It is unknown whether the City is asserting any redactions as no justifications were given nor any explanation for the two sets of copies of these records. Since the information has been disclosed as a public record in one set, it should also be disclosed in the other set.

2. Violations of 67.26, 67.27 - unjustified withholding

Hundreds of redactions were made in the records provided. No justifications of any redactions were provided in any form. Therefore all of the redactions are unlawful withholdings under SF Admin Code 67.26 which requires that redactions be made with clear reference to justification and SFAC 67.27 requiring that those justifications cite exemption statutes or case law. I ask that therefore all redactions be determined public parts of records and disclosed.

The redactions appear quite haphazard - often identical information disclosed in one Commissioner's copy of an email is redacted in another Commissioner's. This is irrational - either the information is exempt or non-exempt.

3. Violations of 67.21(b,k), Gov Code 6253(c) - incomplete response

Furthermore, various requests were made for different custodians and different types of records, including *City of San Jose* personal property searches. Under CPRA Gov Code 6253(c), Respondents are required to inform me whether they or not they had responsive records and whether or not any records were withheld (as opposed to redacted). Respondents have failed to do either. I do not know whether any documents have been withheld. I ask that therefore all withheld documents be determined public records and disclosed.

4. Violations of 67.21(b,k), Gov Code 6253(b) - failure to provide copies of records

I allege that copies of records 4 to 73, and 75 to 113, which are all emails, were never actually provided.

For unknown reasons, for those records, the custodians forwarded the original email (which is the responsive record) to other people, and those other people converted the forwarded email to PDF.

This is *not* about the metadata in the emails or native formats. This is about the fact they forwarded old emails, creating a new record, and then converted *the new forwarded record* into a PDF, instead of just copying the actual email into a PDF (as the City usually does).

For some reason, record 74 was in fact provided correctly which proves the Police Commission does know how to produce these records, in PDF format, with redactions.

Respondents must provide exact copies (even in PDF format) of the original responsive emails, not forward them which creates entirely new emails.

Appendix A

Records disclosed as of this complaint:

3 jpegs of text messages:

1. Hirsch - Responsive 28.jpg
2. Hirsch - Responsive 27.jpg
3. Brookter - Responsive 1.jpg

110 email PDFs; with embedded attachment files that require Adobe Acrobat to open the attachments
(not all attachments listed):

4. Taylor - Responsive 25.pdf
5. Taylor - Responsive 24_Redacted.pdf
6. Taylor - Responsive 23_Redacted.pdf
7. Taylor - Responsive 22_Redacted.pdf
 - a. 2.27.19 Public Defender Adachi Memorial Service.pdf
8. Taylor - Responsive 21.pdf
 - a. 2.27.19 Public Defender Adachi Memorial Service.pdf
9. Taylor - Responsive 20_Redacted.pdf
 - a. 2.27.19 Public Defender Adachi Memorial Service.pdf
10. Taylor - Responsive 19_Redacted.pdf
11. Taylor - Responsive 18_Redacted.pdf
 - a. 035-19 SFPD News Conference on Adachi Report Criminal Investigation.pdf
12. Taylor - Responsive 17_Redacted.pdf
 - a. 19-059 SFPD Statement on Adachi Report Criminal Investigation.pdf
13. Taylor - Responsive 16.pdf
14. Taylor - Responsive 15.pdf
15. Taylor - Responsive 14.pdf
 - a. Police Commission Statement 052619.pdf
16. Taylor - Responsive 13.pdf
 - a. Police Commission Statement 052619.pdf
17. Taylor - Responsive 12.pdf
 - a. Police Commission Statement 052619.pdf
18. Taylor - Responsive 11_Redacted.pdf
 - a. Police Commission Statement 052619.pdf
19. Taylor - Responsive 10_Redacted.pdf
20. Taylor - Responsive 9_Redacted.pdf
21. Taylor - Responsive 8_Redacted.pdf
22. Taylor - Responsive 7_Redacted.pdf
23. Taylor - Responsive 6_Redacted.pdf
24. Taylor - Responsive 5_Redacted.pdf

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25. Taylor - Responsive 4_Redacted.pdf
26. Taylor - Responsive 3.pdf
27. Taylor - Responsive 2_Redacted.pdf
 - a. Letter to the Police Commission.pdf
28. Taylor - Responsive 1.pdf
 - a. DPA Letter to Commission 9.11.19 (002).docx
 - b. SB 1421 Symposium Workshop - As Presented to A.pdf
29. Mazzucco - Responsive 1_Redacted.pdf
30. Hirsch - Responsive 26.pdf
31. Hirsch - Responsive 25_Redacted.pdf
32. Hirsch - Responsive 24_Redacted.pdf
33. Hirsch - Responsive 23_Redacted.pdf
34. Hirsch - Responsive 22_Redacted.pdf
35. Hirsch - Responsive 21_Redacted.pdf
36. Hirsch - Responsive 20_Redacted.pdf
 - a. Police Commission Statement 052619.pdf
37. Hirsch - Responsive 19_Redacted.pdf
 - a. Police Commission Statement 052619.pdf
38. Hirsch - Responsive 18_Redacted.pdf
 - a. Police Commission Statement 052619.pdf
39. Hirsch - Responsive 17.pdf
 - a. Police Commission Statement 052619.pdf
40. Hirsch - Responsive 16.pdf
 - a. Police Commission Statement 052619.pdf
41. Hirsch - Responsive 15.pdf
 - a. Police Commission Statement 052619.pdf
42. Hirsch - Responsive 14.pdf
43. Hirsch - Responsive 13_Redacted.pdf
44. Hirsch - Responsive 12_Redacted.pdf
 - a. 19-059 SFPD Statement on Adachi Report Criminal Investigation.pdf
45. Hirsch - Responsive 11_Redacted.pdf
 - a. 19-059 SFPD Statement on Adachi Report Criminal Investigation.pdf
46. Hirsch - Responsive 10_Redacted.pdf
47. Hirsch - Responsive 9_Redacted.pdf
48. Hirsch - Responsive 8_Redacted.pdf
 - a. Ltr. to B. Jones 3.8.2019.pdf
49. Hirsch - Responsive 7_Redacted.pdf
 - a. 2.27.19 Public Defender Adachi Memorial Service.pdf
50. Hirsch - Responsive 6_Redacted.pdf
 - a. 2.27.19 Public Defender Adachi Memorial Service.pdf
51. Hirsch - Responsive 5_Redacted.pdf
 - a. 2.27.19 Public Defender Adachi Memorial Service.pdf
52. Hirsch - Responsive 4_Redacted.pdf

53. Hirsch - Responsive 3_Redacted.pdf
54. Hirsch - Responsive 2_Redacted.pdf
55. Hirsch - Responsive 1_Redacted.pdf
56. Hamasaki - Responsive 37_Redacted.pdf
 - a. cornell v ccsf 0109191.pdf
 - b. simpson v ccsf 0109191.pdf
 - c. jan 9 2019 agenda RED copy1.pdf
 - d. [redacted name]
57. Hamasaki - Responsive 36_Redacted.pdf
 - a. DGO 1.06.pdf
 - b. DOJ recommendations draft MOU SFPD_DPA 121918.pdf
 - c. DOJ recommendations DRAFT DGO 2.04 Complaints Against Officers 010419 FINAL.pdf
 - d. Letter from Chief to CAL DOJ 2.04 and 3.01 After Conference Call 01-07-19.pdf
58. Hamasaki - Responsive 35_Redacted.pdf
 - a. image001.png
 - b. DPASummary_SFUSD-SFPDDec2018CommunityMeeting_MOU.docx
 - c. [redacted name]
 - d. [redacted name]
 - e. DPA_YouthRightsBrochure_October.pdf
 - f. DPA_Memo_BWC_CaseSummaries.docx
 - g. LAPD body worn camera.pdf
 - h. ACSO-Body-Worn-Cameras-General-Order-2016.pdf
 - i. SB 1421 FAQ.docx
 - j. PoliceCommissionLtr_SB1421.docx
59. Hamasaki - Responsive 34_Redacted.pdf
60. Hamasaki - Responsive 33_Redacted.pdf
61. Hamasaki - Responsive 32.pdf
62. Hamasaki - Responsive 31_Redacted.pdf
63. Hamasaki - Responsive 30_Redacted.pdf
64. Hamasaki - Responsive 29.pdf
65. Hamasaki - Responsive 28_Redacted.pdf
66. Hamasaki - Responsive 27_Redacted.pdf
67. Hamasaki - Responsive 26_Redacted.pdf
 - a. Agenda 7-08-19.docx
 - b. [redacted name]
 - c. DPA complaint page.JPG
 - d. SFPD Complaint Page.JPG
 - e. SFPD Home Page.JPG
 - f. Know Your Rights Update_6.26.2019 - RK Edits v2.docx
 - g. [redacted name]
 - h. [redacted name]
 - i. sfpd business card v 2 safety with respect.pdf
 - j. Minutes_Bias Working Group_061019.docx

68. Hamasaki - Responsive 25_Redacted.pdf
69. Hamasaki - Responsive 24_Redacted.pdf
70. Hamasaki - Responsive 23_Redacted.pdf
 - a. aug 7 2019 agenda RED copy1.pdf
 - b. res 18-14 IAD 2016-0206 decision.pdf
 - c. ALW OCC 0706-14 appeal1.pdf
71. Hamasaki - Responsive 22.pdf
72. Hamasaki - Responsive 21_Redacted.pdf
73. Hamasaki - Responsive 20_Redacted.pdf
74. Hamasaki - Responsive 17_Redacted.pdf
75. Hamasaki - Responsive 16_Redacted_1.pdf
 - a. jun 5 2019 agenda RED copy1.pdf
 - b. [redacted name]
 - c. [redacted name]
 - d. [redacted name]
 - e. DPA 0145-15B specifications1.pdf
76. Hamasaki - Responsive 15_Redacted.pdf
77. Hamasaki - Responsive 14_Redacted.pdf
78. Hamasaki - Responsive 13.pdf
79. Hamasaki - Responsive 12.pdf
80. Hamasaki - Responsive 11.pdf
81. Hamasaki - Responsive 10.pdf
82. Hamasaki - Responsive 9.pdf
83. Hamasaki - Responsive 8_Redacted.pdf
84. Hamasaki - Responsive 7.pdf
85. Hamasaki - Responsive 6_Redacted.pdf
86. Hamasaki - Responsive 5_Redacted.pdf
87. Hamasaki - Responsive 4_Redacted.pdf
88. Hamasaki - Responsive 3_Redacted.pdf
89. Hamasaki - Responsive 2.pdf
90. Hamasaki - Responsive 1_Redacted.pdf
91. Elias - Responsive 4.pdf
92. Elias - Responsive 3_Redacted.pdf
93. Elias - Responsive 2_Redacted.pdf
94. Elias - Responsive 1.pdf
95. DeJesus - Responsive 3_Redacted.pdf
96. DeJesus - Responsive 2_Redacted.pdf
97. DeJesus - Responsive 1_Redacted.pdf
98. Campbell - Responsive 16_Redacted.pdf
99. Campbell - Responsive 15.pdf
100. Campbell - Responsive 14_Redacted.pdf
101. Campbell - Responsive 13_Redacted.pdf
102. Campbell - Responsive 12_Redacted.pdf

103. Campbell - Responsive 11_Redacted.pdf
104. Campbell - Responsive 10_Redacted.pdf
105. Campbell - Responsive 9_Redacted.pdf
106. Campbell - Responsive 8_Redacted.pdf
107. Campbell - Responsive 7_Redacted.pdf
108. Campbell - Responsive 6_Redacted.pdf
109. Campbell - Responsive 5_Redacted.pdf
110. Campbell - Responsive 4_Redacted.pdf
111. Campbell - Responsive 3_Redacted.pdf
112. Campbell - Responsive 2.pdf
113. Campbell - Responsive 1.pdf

Appendix B - My Request

San Francisco Police Commission
Custodian of Records
1245 3rd Street
San Francisco CA 94158
sfpd.commission@sfgov.org
sent via email

Our ref.
#20192335

Date
2019-09-11

RE: Adachi Communications Audit – Immediate Disclosure Request

To Whom It May Concern:

** NOTE: Please redact all responses correctly! This is a public mailbox, and all of your responses (including disclosed records) may be automatically and instantly available to the general public on the MuckRock.com service used to issue this request (though I am not a MuckRock representative). Once you send them to us, there is no going back. **

We request under the San Francisco Sunshine Ordinance (Ordinance) and the California Public Records Act (CPRA) the below records from the SF Police Commission. Parts A and B are an immediate disclosure request, the rest are regular timeline.

Please send all of your replies to both the address you received this request from and also please 'BCC' the following address: arecords.requestor+aca20192335@protonmail.com. I will not use any third-party records website - please just email all records.

We remind you of your obligations to provide electronic records in any format we request them in, if that format is the original format, available to you, OR easily generated. Therefore, e-mails exported in the .eml or .msg format with all non-exempt headers, metadata, attachments, images, etc. are best. However, if you choose (against our wishes) to convert emails, for example, to PDF or printed format, to easily redact them, you must ensure that you have preserved the full content (hyperlinks, formatting, images, attachments, etc.) of the original email record, which also contains many detailed headers beyond the generally used From/To/Subject/Sent/etc. For the chat apps, a screenshot or print-out is acceptable, but it must retain all attachments, timestamps, images, etc which must be provided separately if screenshots cannot capture that info.

Original records are generally in color - do not convert them to black and white and thus destroy informa-

tion.

As used below "communications" include but are not limited to any metadata records showing that a conversation had taken place but is now deleted (due to expiration for example). "Sent" and "received" include every form of communication or transmissions - including but not limited to "to," "from," "cc," "bcc," mailing lists, etc. and also include posting or receiving messages in social media (like tweets or wall posts). "Account" refers to *every* account, not just a primary or public-facing account.

If you use PDF, you must use text pdfs (which are easily generated). Please don't use image/scanned PDFs to make it harder to analyze the records. If you provide PDFs instead of original email files, only give a few of the headers or lacking attachments/images, and/or improperly withhold public records that exist on private accounts/devices you may be in violation of SF Admin Code and/or CPRA, and we may challenge your decision at the Sunshine Ordinance Task Force, Supervisor of Records, judicially, and/or via any other remedies available to us. I currently have pending petitions to the Task Force and Supervisor of Records to correct prior disclosure failures of electronic information from SF agencies.

You must justify all withholding. Please ensure your justification is tied specifically to each and every redaction, not a general redaction. If you withhold or redact records, do not destroy the originals - I intend to petition the Sup. of Records, SOTF, and/or Superior Court for all withholdings/redactions.

Provide records in a rolling fashion. Do not wait for all records to be available.

Please provide only those copies of records available without any fees. If you determine certain records would require fees, please instead provide the required free notice of which of those records are available and non-exempt for inspection in-person if we so choose. Please use email to respond.

Keywords provided should be searched in all parts of the record: subject, body, to/from/etc., headers, metadata, attachments, and so on.

I expect a determination of "no responsive records," "all records disclosed," "all records withheld" (with justification), or "some records disclosed, some withheld" (with justification) for each and every individual request of the 300 total requests made below.

I look forward to your prompt disclosure.

A. IMMEDIATE DISCLOSURE REQUEST: an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, events, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED GOVT EMAIL OR CALENDAR ACCOUNTS, containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

B. IMMEDIATE DISCLOSURE REQUEST: an electronic copy (i.e. scan if only physical copies exist), in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all memoranda, notebooks, papers, orders, warrants, arrest reports, evidence inventories, notes, post-its, court orders, subpoenas, mailings, invoices and other writing of the following, containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" created between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

C. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Facebook Messenger], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

D. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED accounts in [Telegram], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

E. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Facebook (i.e. Facebook pages, posts, etc.)], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10,

2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

F. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Slack], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

G. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Google Hangouts], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

H. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Signal], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco

5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

I. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [SMS/MMS/text/chat messages, using any app not explicitly mentioned in this request], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

J. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [WhatsApp], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

K. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Instagram], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

L. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [WeChat], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

M. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Skype], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
7. DionJay Brookter
8. Sgt. Jayme Campbell

N. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR CITY-OWNED account in [Twitter], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
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1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
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AA. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL email account (per City of San Jose v Superior Court (2017)), containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
5. John Hamasaki
6. Cindy Elias
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8. Sgt. Jayme Campbell

BB. an electronic copy (or scan if only physical copies exist), in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all personal (per City of San Jose v Superior Court (2017)) memoranda, notebooks, papers, orders, note, post-its, and other writing of the following, containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" created between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus
4. Thomas Mazzucco
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CC. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [Facebook Messenger], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

1. Robert Hirsch
2. Damail Taylor
3. Petra DeJesus

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DD. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [Telegram], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

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1. Robert Hirsch
2. Damail Taylor
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GG. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [Google Hangouts], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

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II. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [SMS/MMS/text/chat messages, using any app not explicitly mentioned in this request], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

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JJ. an electronic copy, in the original electronic format, with all headers, metadata, timestamps, attachments, appendices, exhibits, and inline images, except those explicitly exempted by the Ordinance, of all messages, emails, communications, or posts SENT or RECEIVED by each of the following ON THEIR PERSONAL account (per City of San Jose v Superior Court (2017)) in [WhatsApp], containing any of the following (case insensitive): "adachi" OR "public defender" OR "carmody" OR "North Bay News" between Jan. 1, 2019 and Sept 10, 2019

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