

# SCHEMATIC GUIDE TO DPA'S VIOLATIONS OF SUNSHINE in SOTF 19144

**"Public records"** - default to **disclosable** under CPRA and thus also Sunshine. Essentially every non-purely-personal, govt record in any form.

**Peace officer** personnel records - default to **exempt** under PC 832.7(a)

SB 1421 records (firearm discharge, death/great bodily injury, sexual assault, dishonesty) - default to **disclosable** under PC 832.7(b)(1)

Four types of state-wide **mandatory** redactions (**exemptions**): PC 832.7(b)(5)  
(A) personal info of officers,  
(B) anonymity of complainants/witnesses,  
(C) federal law prohibitions or invasion of personal privacy,  
(D) danger to safety

Cannot redact under any other CPRA, Gov Code 6254, or other exemptions

One **optional** state-wide redaction (**exemption**): PC 832.7(b)(6) public-interest balancing test

This optional exemption is prohibited in San Francisco pursuant to SFAC 67.24(i). (Local law is allowed to remove optional exemptions, but not mandatory ones.)

1. DPA refuses to follow SFAC 67.26 by keying by footnote or other clear reference each "masking" (redaction) to a "specific" provision in the law (SFAC 67.27). A, B, C, and D are distinct redaction reasons and must be challenged differently.
2. DPA has never indicated whether any documents were withheld in their entirety, and if so what the justification was (SFAC 67.27).
3. Because DPA refuses to follow the plain language of SFAC 67.26, while also incorrectly defending the use of a prohibited public-interest balancing test exemption, it is impossible to know not only what redactions have what purpose, but also which redactions are unlawful per SFAC 67.24(i). This is a Catch-22.