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*D&S Chalfont*

MICHAEL T. RISHER (State Bar No. 191627)  
mrisher@aclunc.org  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF NORTHERN CALIFORNIA  
39 Drumm Street, 2nd Floor  
San Francisco, California 94111  
Telephone: (415) 621.2493  
Facsimile: (415) 255.1478

CONFORMED COPY  
OF ORIGINAL FILED  
Los Angeles Superior Court

MAY 18 2011

John A. Clarke, Executive Officer/Clerk  
By SHAUNYA WESLEY, Deputy

PETER BIBRING (State Bar No. 223981)  
pbibring@aclu-sc.org  
ACLU FOUNDATION OF SOUTHERN CALIFORNIA  
1313 W. Eighth Street  
Los Angeles, California 90017  
Telephone: (213) 977-9500  
Facsimile: (213) 977-5299

DAVID BLAIR-LOY (State Bar No. 229235)  
dblairloy@aclusandiego.org  
ACLU FOUNDATION OF SAN DIEGO & IMPERIAL COUNTIES  
P.O Box 87131  
San Diego CA 92138-7131  
Telephone: (619) 232-2121  
Facsimile: (619) 232-0036

Attorneys for Petitioners

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

BS131947

David Harris, and  
The Charles Hamilton Houston Institute for Race  
and Justice at Harvard Law School,

Petitioners,

v.

County of Los Angeles, and the  
Office of the District Attorney for Los Angeles  
County

Respondent.

No. \_\_\_\_\_

VERIFIED PETITION FOR  
PEREMPTORY WRIT OF MANDATE  
AND WRIT OF MANDATE

[Cal. Civ. Proc. Code §§ 1085,1086,  
1088.51, 1095]

Department:

INTRODUCTION

1  
2           1.       This is a suit to enforce the California Public Records Act. On August 31, 2010,  
3 Petitioner David Harris submitted a request to obtain a wide variety of records concerning the Los  
4 Angeles County District Attorney’s Office’s expenses relating to homicide cases and discretionary  
5 spending generally by the office. As discussed below, at least some responsive records plainly exist,  
6 and Respondent had a legal duty to search for these records and disclose them or, if such records are  
7 exempt from disclosure, to state the reasons for failing to disclose them. Instead, the DA’s office  
8 responded to the request by flatly denying that it had any responsive records. It did not seek any  
9 clarification of the request or suggest to Petitioner how he might obtain the records, despite the  
10 mandate of Government Code § 6253.1. By refusing to disclose records that plainly exist, or even  
11 acknowledging their existence, Respondent has violated its legal duties. Petitioner therefore asks this  
12 Court for a writ of mandate to command the County to comply with its ministerial duty to search for  
13 and provide responsive records. Petitioner will proceed by noticed motion under Local Rule 9.5(d)(1).

PARTIES

14  
15           2.       Petitioner David Harris is the managing director of the Charles Hamilton Houston  
16 Institute for Race and Justice at Harvard Law School. He is a member of the public under  
17 Government Code § 6252(b) and is beneficially interested in the outcome of these proceedings; he has  
18 a clear, present and substantial right to the relief sought herein and no plain, speedy and adequate  
19 remedy at law other than that sought herein.

20           3.       Petitioner Charles Hamilton Houston Institute on Race and Justice at Harvard Law  
21 School (“CHHIRJ”) is an independent research and policy institute of Harvard Law School created to  
22 address lingering racial inequality and advance an equitable and just society. Its current projects  
23 include an examination of the death penalty and racial disparities in the system of capital punishment.  
24 CHHIRJ is a member of the public under Government Code § 6252(b) and is beneficially interested in  
25 the outcome of these proceedings; it has a clear, present and substantial right to the relief sought herein  
26 and no plain, speedy and adequate remedy at law other than that sought herein.

27           4.       Respondent County of Los Angeles is a local public agency within the meaning of  
28 Government Code § 6252(d). The Los Angeles District Attorney’s Office is a department of the

1 county, required by the county charter. See Gov. Code §§ 25303, 24000(a), § 29601. Charter of the  
2 County of Los Angeles § 12.

3 5. Upon information and belief, Respondent is in possession of records sought by this  
4 Petition.

5  
6 JURISDICTION AND VENUE

7 6. This court has jurisdiction under Government Code §§ 6258, 6259, Code of Civil  
8 Procedure §§ 1060, and 1085, and Article VI, section 10 of the California Constitution.

9 7. Venue is proper in this Court: The records in question, or some portion of them, are  
10 situated in the County of Los Angeles. Gov't Code § 6259; Code Civ. Pro. § 401(1). Also,  
11 Respondent resides in, and the acts and omissions complained of herein occurred in, Los Angeles  
12 County. See Code Civ. Pro. §§ 393, 394(a).

13  
14 THE CALIFORNIA PUBLIC RECORDS ACT

15 8. Under the California Public Records Act, Government Code § 6250 *et seq.* ("PRA"),  
16 all records that are prepared, owned, used, or retained by any public agency, and that are not subject to  
17 the PRA's statutory exemptions to disclosure must be made publicly available for inspection and  
18 copying upon request. Gov't Code § 6253.

19 9. In enacting the PRA the legislature recognized that "a requester, having no access to  
20 agency files, may be unable to precisely identify the documents sought. Thus, writings may be  
21 described by their content. The agency must then determine whether it has such writings under its  
22 control and the applicability of any exemption. An agency is thus obliged to search for records based  
23 on criteria set forth in the search request." *California First Amendment Coalition v. Superior Court*,  
24 67 Cal.App.4th 159, 165-66 (1998); see Gov't Code § 6253(b).

25 10. The PRA also requires the government to "assist the member of the public make a  
26 focused and effective request that reasonably describes an identifiable record or records" by taking  
27 steps to "[a]ssist the member of the public to identify records and information that are responsive to  
28 the request or to the purpose of the request, if stated. *Id.* § 6253.1(a). An agency that receives a

1 request must also “[p]rovide suggestions for overcoming any practical basis for denying access to the  
2 records or information sought.” *Id.*

3 11. The PRA requires the government to determine whether to disclose records within 10  
4 days of receiving a request, unless “unusual circumstances” justify a 14-day extension of that period.  
5 *Id.* § 6253(c). The government must then promptly inform the requesting party of what records will  
6 be disclosed and provide an estimate of when they will be available. *Id.* It must then promptly  
7 provide a copy of the records to the requesting person or allow inspection of the records. *Id.*  
8 § 6253(b). The statute does not allow the government to delay or obstruct the copying of public  
9 records. *Id.* § 6253(d).

10 12. Whenever it is made to appear by verified petition to the superior court of the county  
11 where the records or some part thereof are situated that certain public records are being improperly  
12 withheld from a member of the public, the court shall order the officer or person charged with  
13 withholding the records to disclose the public record or show cause why he or she should not do so.  
14 The court shall decide the case after examining the record in camera (if permitted by the Evidence  
15 Code), papers filed by the parties and any oral argument and additional evidence as the court may  
16 allow. *Id.* § 6258.

17 13. If the Court finds that the failure to disclose is not justified, it shall order the public  
18 official to make the record public. *Id.* § 6259(b).

19 14. In order to ensure that access to the public’s information is not delayed or obstructed,  
20 the PRA requires that “[t]he times for responsive pleadings and for hearings in these proceedings shall  
21 be set by the judge of the court with the object of securing a decision as to these matters at the earliest  
22 possible time.” Gov’t Code § 6258.

23 15. The California Constitution provides an additional, independent right of access to  
24 government records: “The people have the right of access to information concerning the conduct of  
25 the people’s business, and, therefore, the meetings of public bodies and the writings of public officials  
26 and agencies shall be open to public scrutiny.” CAL. CONST., ART. 1 § 3(b)(1). This provision was  
27 adopted by the voters in 2004 because, as the ballot argument supporting the measure put it, when  
28 Californians asked questions of their government they increasingly found out “that answers are hard to

1 get.” The constitutional provision is intended to reverse that trend.

2  
3 FACTS

4 16. On August 31, 2010, Petitioner Harris, in his capacity as the managing director of  
5 CHHIRJ, sent a PRA request to the Los Angeles District Attorney’s Office. A copy of this request is  
6 attached to this petition as exhibit A. The request sought documents summarizing or listing expenses  
7 that the District Attorney’s Office had incurred in the previous ten years with respect to a number of  
8 specific areas of its work on homicide cases. It also sought records relating to actual expenditures  
9 classified as “discretionary” or “professional services,” including but not limited to records related to  
10 expenses for “professional services, training, transportation, and supplies.”

11 17. All of the records requested in Exhibit A fall within the definition of public records set  
12 forth in the PRA. *See* Gov’t Code § 6252(e).

13 18. On September 16, 2010, the LADA responded to this request by letter, flatly stating  
14 that that “Office does not have any documents or materials responsive to your request.” A copy of this  
15 letter is attached to this petition as Exhibit B. Nothing in the letter provided any assistance to  
16 Petitioner Harris in focusing his request or otherwise obtaining the information he sought. Nor did  
17 anything in the letter suggest that the agency needed clarification about what records were being  
18 sought.

19 19. On October 8, 2010, Mr. Harris again attempted to obtain this information by sending a  
20 separate request to the Los Angeles County Auditor-Controller. A copy of this request is attached to  
21 this petition as Exhibit C. This request asked for the same information Petitioner Harris had requested  
22 in his letter to the District Attorney, Exhibit A.

23 20. On October 14, the Auditor-Controller responded to this request by letter, stating that  
24 the requested information should be requested from the specific county department that incurred the  
25 expenses, identifying the District Attorney’s Office as one such department. A copy of this letter is  
26 attached to this petition as Exhibit D.

27 21. As of the time this Petition was verified, neither Respondent County nor the District  
28 Attorney has provided Petitioner with any of the requested records or responded in any way aside from

1 Exhibit B.

2 22. Upon information and belief, the LADA has at least some of the requested records in its  
3 possession.

4 23. Upon information and belief, the LADA handles the vast majority of prosecutions  
5 arising out of murders in Los Angeles County. According to FBI statistics, there were about seven  
6 hundred murders and non-negligent homicides in Los Angeles County in 2009, accounting for  
7 approximately 35% of the homicides in California and nearly 5% of the homicides in the entire United  
8 States.<sup>1</sup>

9 24. Upon information and belief, the LADA handles a significant number of capital cases.  
10 Prosecutors from the LADA obtained sixty-two death sentences between 2000 and 2009. In 2009,  
11 death sentences obtained by the LADA accounted for 45% of the total death sentences in California,  
12 and outnumbered the death sentences handed down across the entire state of Texas.<sup>2</sup> All of these  
13 necessarily involve murder charges, and expenses related to these cases would therefore be covered by  
14 the request.

15 25. Upon information and belief, the LADA regularly employs experts in its homicide  
16 cases, such as psychiatrists, and must have records showing how much it has paid these experts for  
17 their time and expenses.

18 26. Upon information and belief, the LADA frequently incurs costs related to  
19 investigations in homicide cases, such as the costs of forensic analysis of DNA evidence, and must  
20 have records showing how much it has paid for these services.

21 27. Upon information and belief, the LADA also pays for the travel expenses of some  
22 witnesses in homicide cases and must have records showing these expenditures.

23 28. Other district attorney's offices have responded to the identical request by producing  
24 records. For example, Petitioner Harris sent an identical PRA request to Alameda County District

25 <sup>1</sup> See *Crime in the United States 2009*, U.S. Dep't of Justice, Federal Bureau of Investigation, at  
26 <http://www2.fbi.gov/ucr/cius2009/index.html> (last visited May 6, 2011); see also *The Homicide Report*,  
27 *L.A. Times*, at <http://projects.latimes.com/homicide/map/> (last visited May 6, 2011) (reporting 739  
homicides in 2009).

28 <sup>2</sup> See *Death in Decline '09*, Report on the Death Penalty by the ACLU of Northern California (Mar. 29,  
2010), available at [http://aclunc.org/docs/criminal\\_justice/death\\_penalty/death\\_in\\_decline\\_09.pdf](http://aclunc.org/docs/criminal_justice/death_penalty/death_in_decline_09.pdf).

1 Attorney's Office. A copy of this request is attached to this petition as Exhibit E. In response to this  
2 request, the Alameda County District Attorney provided an excel spread sheeting, summarizing all  
3 expenses categorized as discretionary or professional services. A copy of this document is attached to  
4 this petition as Exhibit F. In addition, the Alameda County District Attorney also provided copies of  
5 forms used to seek reimbursement from the State of California for work done on habeas petitions in  
6 homicide cases. A copy of one of these forms is attached as Exhibit G.

7 29. Upon information and belief, the LADA, like the Alameda County District Attorney, is  
8 entitled to reimbursement by the State of California for work on habeas cases. There are many pending  
9 habeas cases from homicide trials that occurred in Los Angeles County, including several homicide  
10 cases. For example, upon information and belief, the LADA has submitted claims to the state for tens  
11 of thousands of dollars of post-conviction work on the habeas case of Robert Lewis, who has been  
12 convicted of first-degree murder and sentenced to death. If the LADA sought reimbursement from the  
13 State in any of other such cases in the last ten years, it must have records relating to the reimbursement  
14 request.

15 30. Upon information and belief, more broadly, the LADA pays for its employees to attend  
16 training programs and provides training programs internally. All of these expenses fall within  
17 Petitioner Harris' request for documents relating to "discretionary services" or "professional services,"  
18 which specifically listed "training" as an example.

19 31. Upon information and belief, the LADA orders supplies and services that it uses in  
20 homicide cases, such as creating enlarged photographs and other exhibits, as well as other supplies.  
21 All of these expenses fall within Petitioner Harris' request for documents relating to "discretionary  
22 services" or "professional services," which specifically listed "supplies" as an example.

23 32. Upon information and belief, the LADA reimburses its employees for necessary, work  
24 related travel expenses such as the travel costs of investigators and attorneys who must leave the office  
25 to interview witnesses and serve subpoenas. All of these expenses fall within Petitioner Harris' request  
26 for documents relating to "discretionary services" or "professional services," which specifically listed  
27 "transportation" as an example.

1 **FIRST CAUSE OF ACTION**

2 **For Violation of the California Public Records Act &**

3 **Article I, § 3 of the California Constitution**

4 (All Petitioners against all Respondents)

5 33. Petitioner incorporates herein by reference the allegations of paragraphs 1 through 32  
6 above, as if set forth in full.

7 34. The LADA’s refusal to provide records, to show why it was withholding records, or  
8 even to admit that it possesses responsive records serves to “effectively deny access to all public  
9 records,” thus constitutes unlawfully withholding records from Petitioners in violation of the PRA and  
10 Article I, § 3 of the California Constitution. *See Galbiso v. Orosi Public Utility Dist.*, 167 Cal.App.4th  
11 1063, 1087 (2008).

12 35. Respondents’ inaccurate categorical denial that it possesses any responsive records  
13 violates the PRA and Article I, § 3 of the California Constitution.

14 36. Respondents’ failure to release the requested records to Petitioners violates the PRA  
15 and Article I, § 3 of the California Constitution.

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1           **WHEREFORE**, Petitioner prays as follows:

2           1.       That the Court direct Respondents to provide Petitioners with a list of all responsive  
3 records that it has not released to Petitioners, with an explanation of why each such record is not  
4 subject to release, *see State Bd. of Equalization v. Super. Ct.*, 10 Cal. App. 4th 1177, 1193 (1992);

5           2.       That the Court issue a peremptory writ of mandate directing Respondents to provide  
6 Petitioners with all requested records except those records that the Court determines may lawfully be  
7 withheld;

8           3.       That Petitioners be awarded attorneys' fees and costs; and

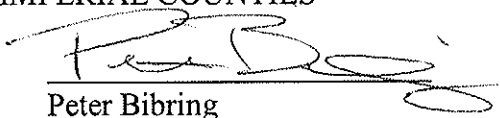
9           4.       For such other and further relief as the Court deems proper and just.

10  
11 Dated: May 18, 2011

Respectfully submitted,

12           ACLU FOUNDATION OF NORTHERN  
13           CALIFORNIA  
14           ACLU FOUNDATION OF SOUTHERN  
15           CALIFORNIA  
16           ACLU FOUNDATION OF SAN DIEGO &  
17           IMPERIAL COUNTIES

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By:

  
Peter Bibring  
Attorney for Petitioners

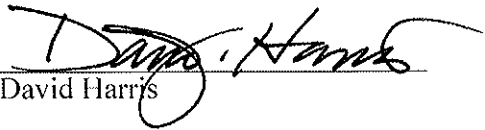
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**VERIFICATION**

I, David Harris, have read this VERIFIED PETITION FOR PEREMPTORY WRIT OF MANDATE AND WRIT OF MANDATE in the matter of *Harris et al. v. County of Los Angeles et al.* The facts alleged in paragraphs 2, 3, 16, 17, 18, 19, 20, 21, and 28 are within my own knowledge and I know these facts to be true. As to the remainder of the Petition, I am informed, and do believe, that the matters herein are true. On that ground I allege that the matters stated herein are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATED: 5-9-11

  
David Harris

EXHIBIT

A



August 31, 2010

District Attorney Steve Cooley  
Attn: Public Records Response Officer  
Los Angeles County District Attorney's Office  
210 West Temple Street 18-1103  
Los Angeles, CA 90012

RE: Public Records Act Request—Expense Information

Dear Public Records Response Officer:

We are writing to request a copy of the following records, which we understand to be in the possession of your agency, and available to the public under California law: 1<sup>1</sup>

1. Any and all documents describing, summarizing or listing all actual financial expenses that your office incurred in state court cases in which a violation of California Penal Code section 187 was charged in your county in the past ten years.
2. Any and all documents summarizing or listing all actual financial expenses your office has incurred from direct appellate review of murder cases in your country in the past ten years.
3. Any and all documents summarizing or listing all actual financial expenses your office has incurred from federal post-conviction review of murder cases in your country in the past ten years.
4. Any and all documents summarizing or listing all actual financial expenses your office has incurred from state post-conviction review of murder cases in your country in the past ten years.
5. Any and all other documents summarizing or listing all actual financial expenses your office has incurred that relate to or result in findings related to the operation of capital punishment in your county in the past ten years.
6. For any actual expenses over the past ten years labeled as either “discretionary services” or “professional services,” any and all records documenting how that money was spent, including but not limited to:
  - a. Spreadsheets documenting discretionary spending by category, such as professional services, training, transportation, and supplies;

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<sup>1</sup> California Public Records Act (Government Code §§ 6250 *et seq.*); California Constitution Art. I §3(b).

- b. Spreadsheets documenting discretionary spending by individual cases; and/or
- c. Receipts, invoices, canceled checks, check requests, requests for authorization of expenditures, or any other records documenting actual expenditures for all discretionary expenditures the past ten years.

If any of these records are available in electronic versions, formatted as .xls, .doc or .txt files, please provide them in those formats.

As you may know, the California Public Records Act states that you are required to respond to this request within ten days by either providing all the requested information or providing a written response setting forth the specific legal authority on which you rely in failing to disclose each document. The Act applies to all documents in the agency's possession, regardless of who authored them.

If you determine that any or all of the information is exempt from disclosure, I ask that you reconsider that determination in view of Prop 59, which has amended Article I §3(b) of the state Constitution to require that all exemptions be "narrowly construed." Prop 59 may modify or overturn authorities on which you have relied in the past.

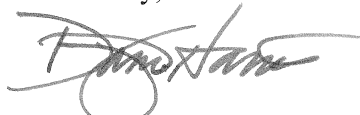
If you need clarification or additional information please contact me by phone at (617) 495-8075 or by email at [dharris@law.harvard.edu](mailto:dharris@law.harvard.edu).

The Charles Hamilton Houston Institute for Race and Justice will reimburse your agency for reasonable copying costs; however, please notify one of us of any duplication costs exceeding \$100 so that we may decide which records we want copied. The records, once prepared, may be mailed to me at the Charles Hamilton Institute for Race and Justice (address above), or picked up by courier, whichever method is preferred by your agency.

If compilation of the materials is expected to take more than three business days, please contact me with an approximate expected date of completion.

Thank you for your time and attention to this matter.

Sincerely,



David J. Harris  
Managing Director

**EXHIBIT**

**B**



LOS ANGELES COUNTY DISTRICT ATTORNEY'S OFFICE  
BUREAU OF PROSECUTION SUPPORT OPERATIONS

STEVE COOLEY • District Attorney  
JOHN K. SPILLANE • Chief Deputy District Attorney  
SHARON J. MATSUMOTO • Assistant District Attorney

LAEL R. RUBIN • Director

September 16, 2010

David Harris, Managing Director  
Charles Hamilton Houston Institute for Race & Justice  
Harvard Law School  
125 Mount Auburn Street, 3<sup>rd</sup> Floor  
Cambridge, Massachusetts 02138-5765

Dear Ms. Harris:

PUBLIC RECORDS ACT REQUEST

The Los Angeles County District Attorney's Office is in receipt of your Public Records Act request dated August 31, 2010 wherein you requested:

1. Any and all documents describing, summarizing or listing all actual financial expenses that your office incurred in state court cases in which a violation of California Penal Code section 187 was charged in your county in the past ten years.
2. Any and all documents summarizing or listing financial expenses your office has incurred from direct appellate review of murder cases in your country [sic] in the past ten years.
3. Any and all documents summarizing or listing financial expenses your office has incurred from direct federal post-conviction review of murder cases in your country [sic] in the past ten years.
4. Any and all documents summarizing or listing financial expenses your office has incurred from state post-conviction review of murder cases in your country [sic] in the past ten years.
5. Any and all documents summarizing or listing financial expenses your office has incurred that relate to or result in findings related to the operation of capital punishment in your county in the past ten years.

---

18-1102 Clara Shortridge Foltz Criminal Justice Center  
210 West Temple Street  
Los Angeles, CA 90012  
(213) 974-3520

David Harris, Managing Director  
Page Two  
September 16, 2010

6. For any actual expenses over the past ten years labeled as either "discretionary services" or "professional services," any and all records documenting how that money was spent, including but not limited to:
  - a. Spreadsheets documenting discretionary spending by category, such as professional services, training, transportation, and supplies;
  - b. Spreadsheets documenting discretionary spending by individual cases; and/or
  - c. Receipts, invoices, canceled checks, check requests, requests for authorization of expenditures, or any other records documenting actual expenditures for all discretionary expenditures the [sic] past ten years.

Our Office does not have any documents or materials responsive to your request.

If you have any further questions, please feel free to call me at (213) 974-7991.

Very truly yours,

STEVE COOLEY  
District Attorney

By



VALERIE SCOTT COLE  
Deputy District Attorney

caf



# EXHIBIT

## C



October 8, 2010

By facsimile to: (510) 271-5157

Nancy O'Malley, District Attorney  
Alameda County District Attorney's Office  
1225 Fallon Street, Room 900  
Oakland, CA 94612

RE: Public Records Act Request—Expense Information

Dear Ms. O'Malley:

We are writing to request a copy of the following records, which we understand to be in the possession of your agency, and available to the public under California law:<sup>1</sup>

1. Any and all documents describing, summarizing or listing all actual financial expenses that your office incurred in state court cases in which a violation of California Penal Code section 187 was charged in your county in the past ten years.
2. Any and all documents summarizing or listing all actual financial expenses your office has incurred from direct appellate review of murder cases in your country in the past ten years.
3. Any and all documents summarizing or listing all actual financial expenses your office has incurred from federal post-conviction review of murder cases in your country in the past ten years.
4. Any and all documents summarizing or listing all actual financial expenses your office has incurred from state post-conviction review of murder cases in your country in the past ten years.
5. Any and all other documents summarizing or listing all actual financial expenses your office has incurred that relate to or result in findings related to the operation of capital punishment in your county in the past ten years.
6. For any actual expenses over the past ten years labeled as either “discretionary services” or “professional services,” any and all records documenting how that money was spent, including but not limited to:
  - a. Spreadsheets documenting discretionary spending by category, such as professional services, training, transportation, and supplies;

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<sup>1</sup> California Public Records Act (Government Code §§ 6250 *et seq.*); California Constitution Art. I §3(b).

- b. Spreadsheets documenting discretionary spending by individual cases; and/or
- c. Receipts, invoices, canceled checks, check requests, requests for authorization of expenditures, or any other records documenting actual expenditures for all discretionary expenditures the past ten years.

If any of these records are available in electronic versions, formatted as .xls, .doc or .txt files, please provide them in those formats.

As you may know, the California Public Records Act states that you are required to respond to this request within ten days by either providing all the requested information or providing a written response setting forth the specific legal authority on which you rely in failing to disclose each document. The Act applies to all documents in the agency's possession, regardless of who authored them.

If you determine that any or all of the information is exempt from disclosure, I ask that you reconsider that determination in view of Prop 59, which has amended Article I §3(b) of the state Constitution to require that all exemptions be "narrowly construed." Prop 59 may modify or overturn authorities on which you have relied in the past.

If you need clarification or additional information please contact me by phone at (617) 495-8075 or by email at [dharris@law.harvard.edu](mailto:dharris@law.harvard.edu).

The Charles Hamilton Houston Institute for Race and Justice will reimburse your agency for reasonable copying costs; however, please notify one of us of any duplication costs exceeding \$100 so that we may decide which records we want copied. The records, once prepared, may be mailed to me at the Charles Hamilton Institute for Race and Justice (address above), or picked up by courier, whichever method is preferred by your agency.

If compilation of the materials is expected to take more than three business days, please contact me with an approximate expected date of completion.

Thank you for your time and attention to this matter.

Sincerely,



David J. Harris  
Managing Director

**EXHIBIT**  
**D**



**COUNTY OF LOS ANGELES  
DEPARTMENT OF AUDITOR-CONTROLLER**

KENNETH HAHN HALL OF ADMINISTRATION  
500 WEST TEMPLE STREET, ROOM 525  
LOS ANGELES, CALIFORNIA 90012-3873  
PHONE: (213) 974-8301 FAX: (213) 626-5427

WENDY L. WATANABE  
AUDITOR-CONTROLLER

MARIA M. OMS  
CHIEF DEPUTY

ASST. AUDITOR-CONTROLLERS

ROBERT A. DAVIS  
JOHN NAIMO  
JUDI E. THOMAS

October 14, 2010

Mr. David J. Harris  
Managing Director  
Charles Hamilton Houston  
Institute for Race and Justice  
125 Mount Auburn Street, 3<sup>rd</sup> Floor  
Cambridge, MA 02138-5765

Dear Mr. Harris:

**PUBLIC RECORDS ACT REQUEST—EXPENSE INFORMATION**

This is in response to your letter dated October 8, 2010 requesting copies of records pursuant to the California Public Records Act.

Our office maintains the County's central accounting records, which are generally organized by each County department. Within each department, expenditures are classified by Salaries and Employee Benefits, Services and Supplies, Other Charges, and Equipment.

The "actual financial expenses" associated with the activities described in No.'s 1 through 6 of your request are not discernable from our records. Details that would be responsive to your request, if any, would be maintained by the County department(s) that incurred such expenses. The nature of this request indicates that the District Attorney, Public Defender, Alternate Public Defender, and Chief Executive Office (which has oversight of a budget unit known as Trial Court Operations) would possibly have responsive information. We recommend that you contact the appropriate department(s), once identified.

For your convenience, a list of County departments and services is accessible from the following internet link: <http://portal.lacounty.gov/wps/portal/lac/directory>

Very truly yours,

FOR  
Wendy L. Watanabe  
Auditor Controller

WLW:MO:JN  
Exec/Naimo/public records-expense information

**EXHIBIT**

**E**



October 8, 2010

By facsimile to: (213) 626-5427

Wendy L. Watanabe  
Auditor-Controller, County of Los Angeles  
500 West Temple Street, Room 525  
Kenneth Hahn Hall of Administration  
Los Angeles, California 90012

RE: Public Records Act Request—Expense Information

Dear Ms. Watanabe:

We are writing to request a copy of the following records, which we understand to be in the possession of your agency, and available to the public under California law:<sup>1</sup>

1. Any and all documents describing, summarizing or listing all actual financial expenses that your office incurred in state court cases in which a violation of California Penal Code section 187 was charged in your county in the past ten years.
2. Any and all documents summarizing or listing all actual financial expenses your office has incurred from direct appellate review of murder cases in your country in the past ten years.
3. Any and all documents summarizing or listing all actual financial expenses your office has incurred from federal post-conviction review of murder cases in your country in the past ten years.
4. Any and all documents summarizing or listing all actual financial expenses your office has incurred from state post-conviction review of murder cases in your country in the past ten years.
5. Any and all other documents summarizing or listing all actual financial expenses your office has incurred that relate to or result in findings related to the operation of capital punishment in your county in the past ten years.
6. For any actual expenses over the past ten years labeled as either “discretionary services” or “professional services,” any and all records documenting how that money was spent, including but not limited to:
  - a. Spreadsheets documenting discretionary spending by category, such as professional services, training, transportation, and supplies;

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<sup>1</sup> California Public Records Act (Government Code §§ 6250 *et seq.*); California Constitution Art. I §3(b).

- b. Spreadsheets documenting discretionary spending by individual cases; and/or
- c. Receipts, invoices, canceled checks, check requests, requests for authorization of expenditures, or any other records documenting actual expenditures for all discretionary expenditures the past ten years.

If any of these records are available in electronic versions, formatted as .xls, .doc or .txt files, please provide them in those formats.

As you may know, the California Public Records Act states that you are required to respond to this request within ten days by either providing all the requested information or providing a written response setting forth the specific legal authority on which you rely in failing to disclose each document. The Act applies to all documents in the agency's possession, regardless of who authored them.

If you determine that any or all of the information is exempt from disclosure, I ask that you reconsider that determination in view of Prop 59, which has amended Article I §3(b) of the state Constitution to require that all exemptions be "narrowly construed." Prop 59 may modify or overturn authorities on which you have relied in the past.

If you need clarification or additional information please contact me by phone at (617) 495-8075 or by email at [dharris@law.harvard.edu](mailto:dharris@law.harvard.edu).

The Charles Hamilton Houston Institute for Race and Justice will reimburse your agency for reasonable copying costs; however, please notify one of us of any duplication costs exceeding \$100 so that we may decide which records we want copied. The records, once prepared, may be mailed to me at the Charles Hamilton Institute for Race and Justice (address above), or picked up by courier, whichever method is preferred by your agency.

If compilation of the materials is expected to take more than three business days, please contact me with an approximate expected date of completion.

Thank you for your time and attention to this matter.

Sincerely,



David J. Harris  
Managing Director



**EXHIBIT**

**F**

EXCISE TAX ARY EXPENSES FOR DISTRICT ATTORNEY FOR 2009-10 FISCAL YEAR

ALACO Expd Vchrs by Org-date R (org 230100, fund 100000, BY 2010)

AP Unit	Account	Voucher	Vendor	Vendor Name	Journal ID	Journal Date	Sum Amount	Invoice	PO No.
DAOFF	610072	00023553	0000067730	AMERICAN MESSAGING SERVICES, LLC	APA0442396	7/16/2009	183.050	M7669129JG	0000001864
DAOFF	610072	00023591	0000013884	XEROX CORPORATION	APA0442138	7/17/2009	550.050	041609568	0000001851
DAOFF	610072	00023811	0000067730	AMERICAN MESSAGING SERVICES, LLC	APA0444749	8/18/2009	183.050	M7-669129JH	0000001954
DAOFF	610072	00023924	0000013884	XEROX CORPORATION	APA0445848	9/1/2009	342.760	042171779	0000001851
DAOFF	610072	00023937	0000050097	KONICA MINOLTA BUSINESS	APA0446698	9/2/2009	3003.330	011143666	0000001958
DAOFF	610072	00023951	0000029413	ASSOCIATED BUSINESS MACHINES	APA0448268	10/1/2009	2357.430	290973	0000001987
DAOFF	610072	00023952	0000029413	ASSOCIATED BUSINESS MACHINES	APA0448268	10/1/2009	2357.430	290972	0000001987
DAOFF	610072	00023954	0000029413	ASSOCIATED BUSINESS MACHINES	APA0448268	10/1/2009	2357.430	290971	0000001987
DAOFF	610072	00023955	0000029413	ASSOCIATED BUSINESS MACHINES	APA0448268	10/1/2009	2357.430	290970	0000001987
DAOFF	610072	00023956	0000029413	ASSOCIATED BUSINESS MACHINES	APA0448268	10/1/2009	2304.750	290969	0000001987
DAOFF	610072	00023957	0000029413	ASSOCIATED BUSINESS MACHINES	APA0448268	10/1/2009	2357.430	290968	0000001987
DAOFF	610072	00023978	0000050097	KONICA MINOLTA BUSINESS	APA0446699	9/14/2009	347.790	8-3062691-89	0000001958
DAOFF	610072	00023979	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	1001.110	011099188	0000002016
DAOFF	610072	00023980	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	2002.220	011099188-2	0000001958
DAOFF	610072	00023981	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	526.640	011099173	0000002016
DAOFF	610072	00023982	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	1053.260	011099173-2	0000001958
DAOFF	610072	00023985	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	474.410	011099212	0000002016
DAOFF	610072	00023986	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	948.800	011099212-2	0000001958
DAOFF	610072	00023987	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	4.290	011143650	0000002016
DAOFF	610072	00023988	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	8.610	011143650-2	0000001958
DAOFF	610072	00023989	0000050097	KONICA MINOLTA BUSINESS	APA0447939	10/1/2009	210.960	011099175	0000002016
DAOFF	610072	00023990	0000050097	KONICA MINOLTA BUSINESS	APA0447939	10/1/2009	402.960	011099175-2	0000001958
DAOFF	610072	00023991	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	226.600	011099178	0000002016
DAOFF	610072	00023992	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	453.200	011099178-2	0000001958
DAOFF	610072	00023993	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	226.600	011099176	0000002016
DAOFF	610072	00023994	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	453.200	011099176-1	0000001958
DAOFF	610072	00023995	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	226.600	011099177	0000002016
DAOFF	610072	00023996	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	453.200	011099177-2	0000001958
DAOFF	610072	00023997	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	83.900	011099179	0000002016
DAOFF	610072	00023998	0000050097	KONICA MINOLTA BUSINESS	APA0448487	10/1/2009	167.820	011099179-2	0000001958
DAOFF	610072	00023999	0000050097	KONICA MINOLTA BUSINESS	APA0447939	10/1/2009	260.000	011099204	0000002016
DAOFF	610072	00024000	0000050097	KONICA MINOLTA BUSINESS	APA0447939	10/1/2009	393.820	011099204-2	0000001958
DAOFF	610072	00024001	0000050097	KONICA MINOLTA BUSINESS	APA0446820	9/14/2009	424.520	8-2277519-79	0000002016
DAOFF	610072	00024002	0000050097	KONICA MINOLTA BUSINESS	APA0446820	9/14/2009	212.260	8-2277519-89	0000001958
DAOFF	610072	00024003	0000050097	KONICA MINOLTA BUSINESS	APA0446820	9/14/2009	409.830	8-2280029-89	0000001958
DAOFF	610072	00024004	0000050097	KONICA MINOLTA BUSINESS	APA0446820	9/14/2009	819.660	8-2280029-79	0000002016
DAOFF	610072	00024005	0000050097	KONICA MINOLTA BUSINESS	APA0446820	9/14/2009	685.200	8-3062691-79	0000002016
DAOFF	610072	00024006	0000050097	KONICA MINOLTA BUSINESS	APA0446820	9/14/2009	3003.330	011005951	0000002016
DAOFF	610072	00024007	0000050097	KONICA MINOLTA BUSINESS	APA0446820	9/14/2009	703.620	8-2195814-79	0000002016
DAOFF	610072	00024008	0000050097	KONICA MINOLTA BUSINESS	APA0446820	9/14/2009	351.810	8-2195814-89	0000001958
DAOFF	610072	00024009	0000050097	KONICA MINOLTA BUSINESS	APA0446820	9/14/2009	715.440	011005952	0000002016
DAOFF	610072	00024010	0000050097	KONICA MINOLTA BUSINESS	APA0447724	9/15/2009	999.850	8-3027488-89	0000001958

ALACO Expd Vchrs by Org-date R (org 230100, fund 100000, BY 2010)

AP Unit	Account	Voucher	Vendor	Vendor Name	Journal ID	Journal Date	Sum Amount	Invoice	PO No.
DAOFF	610072	00024012	0000050097	KONICA MINOLTA BUSINESS	APA0447724	9/15/2009	195.970	8-2179749-89	0000001958
DAOFF	610072	00024013	0000050097	KONICA MINOLTA BUSINESS	APA0447724	9/15/2009	349.400	8-2179750-89	0000001958
DAOFF	610072	00024014	0000050097	KONICA MINOLTA BUSINESS	APA0447724	9/15/2009	698.800	8-2179750-79	0000002016
DAOFF	610072	00024015	0000050097	KONICA MINOLTA BUSINESS	APA0447939	10/1/2009	555.980	8-2179749-79	0000002016
DAOFF	610072	00024016	0000050097	KONICA MINOLTA BUSINESS	APA0447724	9/15/2009	680.800	011143667	0000001958
DAOFF	610072	00024071	0000067730	AMERICAN MESSAGING SERVICES, LLC	APA0447726	9/24/2009	183.050	M7669129JI	0000001954
DAOFF	610072	00024164	0000013884	XEROX CORPORATION	APA0448737	10/8/2009	342.760	042774526	0000001966
DAOFF	610072	00024189	0000050097	KONICA MINOLTA BUSINESS	APA0449237	10/12/2009	1048.210	011188296	0000001958
DAOFF	610072	00024213	0000067730	AMERICAN MESSAGING SERVICES, LLC	APA0449353	10/13/2009	195.580	M7669129JJ	0000001954
DAOFF	610072	00024214	0000013884	XEROX CORPORATION	APA0449353	10/13/2009	533.140	043394987	0000001966
DAOFF	610072	00024374	0000029413	ASSOCIATED BUSINESS MACHINES	APA0450699	11/5/2009	289.080	290975	0000001987
DAOFF	610072	00024416	0000050097	KONICA MINOLTA BUSINESS	APA0450817	11/5/2009	1027.790	011188292	0000001958
DAOFF	610072	00024417	0000050097	KONICA MINOLTA BUSINESS	APA0450699	11/5/2009	587.890	011188294	0000001958
DAOFF	610072	00024418	0000050097	KONICA MINOLTA BUSINESS	APA0450699	11/5/2009	636.770	011188290	0000001958
DAOFF	610072	00024419	0000050097	KONICA MINOLTA BUSINESS	APA0450699	11/5/2009	1055.430	011188283	0000001958
DAOFF	610072	00024420	0000050097	KONICA MINOLTA BUSINESS	APA0450699	11/5/2009	1260.700	011188300	0000001958
DAOFF	610072	00024554	0000050097	KONICA MINOLTA BUSINESS	APA0452468	11/19/2009	3003.330	011231536	0000001958
DAOFF	610072	00024555	0000050097	KONICA MINOLTA BUSINESS	APA0452468	11/19/2009	1579.900	011231521	0000001958
DAOFF	610072	00024556	0000050097	KONICA MINOLTA BUSINESS	APA0452468	11/19/2009	679.800	011231526	0000001958
DAOFF	610072	00024557	0000050097	KONICA MINOLTA BUSINESS	APA0452468	11/19/2009	679.800	011231524	0000001958
DAOFF	610072	00024558	0000050097	KONICA MINOLTA BUSINESS	APA0452468	11/19/2009	679.800	011231525	0000001958
DAOFF	610072	00024559	0000050097	KONICA MINOLTA BUSINESS	APA0452468	11/19/2009	251.720	011231527	0000001958
DAOFF	610072	00024572	0000013884	XEROX CORPORATION	APA0452468	11/19/2009	342.760	044112275	0000001966
DAOFF	610072	00024725	0000050097	KONICA MINOLTA BUSINESS	APA0455597	1/1/2010	675.400	011231550	0000001958
DAOFF	610072	00024726	0000050097	KONICA MINOLTA BUSINESS	APA0455597	1/1/2010	676.110	011231523	0000001958
DAOFF	610072	00024727	0000050097	KONICA MINOLTA BUSINESS	APA0455597	1/1/2010	1917.270	011231553	0000001958
DAOFF	610072	00024728	0000050097	KONICA MINOLTA BUSINESS	APA0455597	1/1/2010	647.620	011231552	0000001958
DAOFF	610072	00024729	0000050097	KONICA MINOLTA BUSINESS	APA0455597	1/1/2010	1650.750	011231560	0000001958
DAOFF	610072	00024758	0000013884	XEROX CORPORATION	APA0453511	12/9/2009	342.760	044684119	0000001966
DAOFF	610072	00024793	0000050097	KONICA MINOLTA BUSINESS	APA0456192	1/1/2010	2083.600	11188293R	0000001958
DAOFF	610072	00024794	0000050097	KONICA MINOLTA BUSINESS	APA0454613	12/17/2009	54.950	011274242	0000001958
DAOFF	610072	00024834	0000050097	KONICA MINOLTA BUSINESS	APA0454956	12/23/2009	12.900	011274220	0000001958
DAOFF	610072	00024836	0000050097	KONICA MINOLTA BUSINESS	APA0454956	12/23/2009	3003.330	011274235	0000001958
DAOFF	610072	00024838	0000050097	KONICA MINOLTA BUSINESS	APA0454956	12/23/2009	680.800	011274236	0000001958
DAOFF	610072	00024981	0000013884	XEROX CORPORATION	APA0456538	1/19/2010	500.360	045381152	0000001966
DAOFF	610072	00025020	0000050097	KONICA MINOLTA BUSINESS	APA0456901	1/22/2010	1027.780	011316272	0000001958
DAOFF	610072	00025021	0000050097	KONICA MINOLTA BUSINESS	APA0456901	1/22/2010	1055.430	011316263	0000001958
DAOFF	610072	00025022	0000050097	KONICA MINOLTA BUSINESS	APA0456901	1/22/2010	1229.470	011316279	0000001958
DAOFF	610072	00025023	0000050097	KONICA MINOLTA BUSINESS	APA0458440	2/1/2010	702.650	011316270	0000001958
DAOFF	610072	00025074	0000050097	KONICA MINOLTA BUSINESS	APA0457739	1/29/2010	646.820	139576615	0000001958
DAOFF	610072	00025167	0000050097	KONICA MINOLTA BUSINESS	APA0458157	2/3/2010	611.290	142553999	0000001958
DAOFF	610072	00025168	0000050097	KONICA MINOLTA BUSINESS	APA0458157	2/3/2010	679.800	011347280	0000001958

ALACO Expd Vchrs by Org-date R (org 230100, fund 100000, BY 2010)

AP Unit	Account	Voucher	Vendor	Vendor Name	Journal ID	Journal Date	Sum Amount	Invoice	PO No.
DAOFF	610072	00025169	0000050097	KONICA MINOLTA BUSINESS	APA0458157	2/3/2010	1579.900	011347275	0000001958
DAOFF	610072	00025170	0000050097	KONICA MINOLTA BUSINESS	APA0458158	2/4/2010	3003.330	011347290	0000001958
DAOFF	610072	00025171	0000050097	KONICA MINOLTA BUSINESS	APA0458158	2/4/2010	251.720	011347281	0000001958
DAOFF	610072	00025172	0000050097	KONICA MINOLTA BUSINESS	APA0458158	2/4/2010	1492.500	011347308	0000001958
DAOFF	610072	00025182	0000050097	KONICA MINOLTA BUSINESS	APA0458158	2/4/2010	1055.440	011347304	0000001958
DAOFF	610072	00025183	0000050097	KONICA MINOLTA BUSINESS	APA0458158	2/4/2010	653.370	011347303	0000001958
DAOFF	610072	00025186	0000050097	KONICA MINOLTA BUSINESS	APA0458158	2/4/2010	604.440	011347277	0000001958
DAOFF	610072	00025190	0000050097	KONICA MINOLTA BUSINESS	APA0459407	2/4/2010	679.800	011347278	0000001958
DAOFF	610072	00025191	0000050097	KONICA MINOLTA BUSINESS	APA0459407	2/4/2010	679.800	011347279	0000001958
DAOFF	610072	00025192	0000050097	KONICA MINOLTA BUSINESS	APA0459407	2/4/2010	634.810	011347302	0000001958
DAOFF	610072	00025216	0000067730	AMERICAN MESSAGING SERVICES, LLC	APA0458441	2/10/2010	46.440	M7669129KA	0000001954
DAOFF	610072	00025217	0000067730	AMERICAN MESSAGING SERVICES, LLC	APA0458441	2/10/2010	54.680	M7669129JL	0000001954
DAOFF	610072	00025226	0000067730	AMERICAN MESSAGING SERVICES, LLC	APA0458677	2/10/2010	55.700	M7669129KB	0000001954
DAOFF	610072	00025229	0000067730	AMERICAN MESSAGING SERVICES, LLC	APA0458677	2/10/2010	223.020	M7669129JK	0000001954
DAOFF	610072	00025253	0000013884	XEROX CORPORATION	APA0458913	2/16/2010	342.760	045905330	0000001966
DAOFF	610072	00025417	0000050097	KONICA MINOLTA BUSINESS	APA0460779	3/4/2010	393.820	011099202	0000001958
DAOFF	610072	00025418	0000050097	KONICA MINOLTA BUSINESS	APA0460779	3/4/2010	196.920	011099202B	
DAOFF	610072	00025421	0000050097	KONICA MINOLTA BUSINESS	APA0460656	3/4/2010	3003.330	011396744	0000001958
DAOFF	610072	00025423	0000050097	KONICA MINOLTA BUSINESS	APA0460779	3/4/2010	685.580	145337341	0000001958
DAOFF	610072	00025425	0000050097	KONICA MINOLTA BUSINESS	APA0460656	3/4/2010	12.900	011396730	0000001958
DAOFF	610072	00025426	0000050097	KONICA MINOLTA BUSINESS	APA0460656	3/4/2010	680.800	011396745	0000001958
DAOFF	610072	00025428	0000013884	XEROX CORPORATION	APA0460656	3/4/2010	342.760	046435184	0000001966
DAOFF	610072	00025462	0000067730	AMERICAN MESSAGING SERVICES, LLC	APA0461052	3/11/2010	187.580	M7669129KC	0000001954
DAOFF	610072	00025617	0000050097	KONICA MINOLTA BUSINESS	APA0467297	4/1/2010	2999.540	011426989	0000001958
DAOFF	610072	00025619	0000050097	KONICA MINOLTA BUSINESS	APA0467297	4/1/2010	1027.790	011426988	0000001958
DAOFF	610072	00025620	0000050097	KONICA MINOLTA BUSINESS	APA0467297	4/1/2010	1055.430	011426978	0000001958
DAOFF	610072	00025621	0000050097	KONICA MINOLTA BUSINESS	APA0467297	4/1/2010	1229.480	011426993	0000001958
DAOFF	610072	00025622	0000050097	KONICA MINOLTA BUSINESS	APA0467297	4/1/2010	636.770	011426985	0000001958
DAOFF	610072	00025660	0000013884	XEROX CORPORATION	APA0467797	4/8/2010	487.310	047216305	0000001966
DAOFF	610072	00025700	0000050097	KONICA MINOLTA BUSINESS	APA0468806	4/23/2010	351.820	011099205A	
DAOFF	610072	00025701	0000050097	KONICA MINOLTA BUSINESS	APA0468806	4/23/2010	703.620	011099205	0000001958
DAOFF	610072	00025801	0000050097	KONICA MINOLTA BUSINESS	APA0469510	5/1/2010	611.290	149441388	0000001958
DAOFF	610072	00025813	0000050097	KONICA MINOLTA BUSINESS	APA0469510	5/1/2010	604.440	011473090	0000001958
DAOFF	610072	00025814	0000050097	KONICA MINOLTA BUSINESS	APA0469510	5/1/2010	679.800	011473091	0000001958
DAOFF	610072	00025815	0000050097	KONICA MINOLTA BUSINESS	APA0470288	5/1/2010	679.800	011473092	0000001958
DAOFF	610072	00025816	0000050097	KONICA MINOLTA BUSINESS	APA0469510	5/1/2010	605.660	011473116	0000001958
DAOFF	610072	00025817	0000050097	KONICA MINOLTA BUSINESS	APA0469510	5/1/2010	1055.440	011473118	0000001958
DAOFF	610072	00025818	0000050097	KONICA MINOLTA BUSINESS	APA0470288	5/1/2010	1482.980	011473121	0000001958
DAOFF	610072	00025819	0000050097	KONICA MINOLTA BUSINESS	APA0469510	5/1/2010	590.740	011473117	0000001958
DAOFF	610072	00025820	0000050097	KONICA MINOLTA BUSINESS	APA0469510	5/1/2010	1579.900	011473102	0000001958
DAOFF	610072	00025823	0000050097	KONICA MINOLTA BUSINESS	APA0470288	5/1/2010	251.720	011473094	0000001958
DAOFF	610072	00025824	0000050097	KONICA MINOLTA BUSINESS	APA0469510	5/1/2010	3003.330	011473104	0000001958

**EXHIBIT**

**G**

COST REPORT (FAM-34)

COSTS INCURRED UNDER SECTION  
4700.2, 4750 OR 6005 OF THE PENAL CODE

NAME OF COUNTY OR CITY County of Alameda		OPERATING DEPARTMENT District Attorney	
SUBJECT'S NAME Ralph International Thomas		SUBJECT'S CDC NUMBER D039802	SUBJECT'S YA NUMBER
COUNTY CASE NUMBER 83244		INCLUSIVE DAYS COSTS WERE INCURRED From: 8/28/02 To: 12/02/02	
NAME OF INSTITUTION San Quentin		CRIMINAL CHARGE OR REASON FOR CLAIM writ of habeas corpus	

JOB CLASSIFICATIONS	REIMB.* ACTIVITY	HRS WORK	HR RATE	SALARIES	FRINGE BENEFITS	SALARIES & BENEFITS
Asst DA II	D	112	91.25 22.65	10,220	2,537	\$ 12,757
Inspector II	D	20	48.45 14.56	969	291	1,260
TOTAL SALARIES				\$ 11,189		
TOTAL SALARIES & BENEFITS						\$ 14,017
INDIRECT COST (RATE 10 ) % X TOTAL SALARIES (2)						\$ 1,119

\*REIMBURSABLE ACTIVITIES

- (A) PREPARATION OF TRIAL
- (B) PRETRIAL HEARING
- (C) ACTUAL TRIAL OR HEARING
- (D) WRIT OF HABEAS CORPUS
- (E) TRANSPORTATION/GUARDING OF PRISONERS
- (F) INVESTIGATION - INCLUDING EVALUATION OF CASES REFERRED BY THE DEPARTMENT OF CORRECTION
- (G) CORONER SERVICES
- (H) CLAIM PREPARATION

OTHER DIRECT CHARGES (1)

	\$
TOTAL OTHER DIRECT CHARGES	\$ 0
TOTAL OPERATING DEPARTMENTAL COST	\$15,136

(1) Use attachment for additional entries  
(2) Authorized only for Penal Code Sections 4700.2 and 4750