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January 22, 2021

Scott A. McMillan
4670 Nebo Drive, Suite 200
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RE: Public Records Request dated December 30, 2020

Dear Mr. McMillan:

The County of San Bernardino ("County") received your request for records and/or information pursuant to the California Public Records Act (PRA) dated December 30, 2020. On January 8, 2021, the County sent you a letter extending the initial response time to January 22, 2021. As discussed below, the County will need special assistance and expertise to extract and compile data that may be responsive to your requests. With respect to those categories of information, please let us know if you would like the County to begin the process of extracting and producing data. Please note that the County will provide an initial estimate of the cost to extract the data and may require advance payment in connection thereto.

Additionally, some of your requests seek confidential security records such that disclosure of the record could reveal information that could be utilized in an attempted attack on the information technology system of the San Bernardino County Registrar of Voters ("ROV") and the County of San Bernardino. As such, the County intends to only produce policies and procedures that could not be utilized in a cyberattack. ROV asserts that such document(s) are exempt from disclosure pursuant to Government Code sections 6254.19, 6254(aa) and 6255 and California Code of Regulations, Title 2, section 19064.

Several of the requests seek confidential voter information. Confidential voter registration information, including voter history, can be applied for and purchased pursuant to Sections 2188 and 2194 of the Elections Code, as well as California Code of Regulations, Title 2, section 19001, et seq., which among other things, require the submittal of an application form as specified in California Code of Regulations, Title 2, section 19008. The information is then only available for specific uses. Pursuant to Elections Code sections 2188 & 2194, voter registration data files are available for purchase only for election, scholarly, journalistic, political or governmental purposes. Commercial use of voter registration information is prohibited by law. Further, the provision of this voter registration information to any third party is prohibited under Title 2 of the California Code of Regulations section 19005. If your request for this information is for a third party, you must provide the information stated in Elections Code section 2188(c) including the name, mailing address and telephone number of the person/organization requesting the voter registration information and the name of the person authorizing or requesting the applicant to obtain the voter registration information.

In order for the Registrar of Voters (ROV) to evaluate a request to purchase voter registration data, as required by State law, please complete the Application for Voter Registration Information located at:

https://www.sbcountyelections.com/Portals/9/VoterRegistration/Form_ApplicationForVoterRegistrationInformation.pdf?_id=1524172530435

As to each specific request, we provide the following responses:

1. *Provide those documents identifying, by date, time and means, all synchronization transmissions between the California Secretary of State and the county Registrar [sic] of Voters.*

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 [“It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific.”].) As written, the request is neither focused nor specific. As written, the request is overbroad as there is no specific time frame

County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

2. *Provide those documents with the results of each synchronization transmission between the California Secretary of State and the county Registrar [sic] of Voters, by number of registrants confirmed as valid, and those that are identified as invalid.*

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 [“It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific.”].) As written, the request is neither focused nor specific. As written, the request is overbroad as there is no specific time frame.

County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

3. *Provide those documents which reflect notifications from the Secretary of State requesting or directing modifications to a voter's registration record between September 1, 2020 and November 15, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

4. *Provide those documents that reflect, in summary form, the modifications to the voter registration record, by date, time, and by any unique voter registration number or name of voter, for those records modified between September 1, 2020 and November 15, 2020.*

Response: ROV can extract and compile responsive voter registration data once ROV receives a completed application for voter registration data and fee pursuant to 2 CCR 19001, et seq. The information can only be produced if the completed application meets the statutory requirements of 2 CCR 19001, et seq.

5. *Provide those documents identifying where, by geographic location, ballots were counted in the County between October 15, 2020, through November 30, 2020.*

Response: All ballots were centrally counted at Registrar of Voters, 777 E. Rialto Ave., San Bernardino, CA 92415.

6. *Provide those documents, i.e., logs, narratives of inspection, created between September 1, 2020 and November 15, 2020 reflecting "Active management (inventory, tracking, and correction) of all software on the network so that only authorized software is installed and can execute" took place in compliance with 2 CCR§ 19064(c)(2).*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

7. *Provide those documents, i.e., logs, narratives of inspection, created between September 1, 2020 and November 15, 2020 reflecting "active management (tracking, reporting, and correction) of the security configuration of laptops, servers, and workstations in order to prevent attackers from exploiting vulnerable services and settings" took place in compliance with 2 CCR§ 19064(c)(3).*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

8. *Provide those documents, i.e., logs, narratives of inspection, created between September 1, 2020 and November 15, 2020 reflecting "Active management (tracking, control, and correction) of the ongoing operational use of ports, protocols, and services on networked devices in order to minimize vulnerabilities available for attack" took place in compliance with 2 CCR§ 19064(c)(9).*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

9. *Provide the log files for all data traffic, including connection requests accepted and refused, between the county's election information file and any other location between September 1, 2020 and November 15, 2020.*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

10. *Provide those documents, i.e., logs, narratives of inspection, created between September 1, 2020 and November 15, 2020 reflecting "Tracking, controlling, preventing, and correcting the security use of wireless local area networks, access points, and wireless client systems" which took place in compliance with 2 CCR§ 19064(c)(15).*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

11. *Provide those documents, i.e., logs, narratives of inspection, created between September 1, 2020 and November 15, 2020 reflecting the inventory and identification of all wireless connections in the County's ballot processing location.*

Response: ROV is unclear of what is meant by "County's ballot processing location." If requestor means the "ballot tally system," there are no wireless devices connected.

12. *Provide those documents, i.e., logs, narratives of inspection, created between September 1, 2020 and November 15, 2020 reflecting the inventory and identification of all wireless-capable devices in the County's ballot processing location.*

Response: ROV is unclear of what is meant by "County's ballot processing location." If requestor means the "ballot tally system," there are no wireless devices connected.

13. *Provide those documents, identifying by serial number, MAC address, device, and location, and the custodian of, all wireless-capable devices in the County's ballot processing location between November 2, 2020 and November 13, 2020.*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

14. *Provide those documents, reflecting any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) operational prior to October 15, 2020, which took place in compliance with 2 CCR § 19064(c)(19).*

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 [“It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific.”].) As written, the request is neither focused nor specific. For instance, the request is not limited or specific to electronic documents in a specific department, such as the ROV, or from/to a specific individual, nor is there any time limitation to the request but simply requests “those documents.” Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

15. *Provide those documents, reflecting training on any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) prior to October 15, 2020.*

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 [“It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific.”].) As written, the request is overbroad as there is no specific time frame other than “prior to October 15, 2020.”

County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

16. *Provide those documents, reflecting roles on any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) prior to October 15, 2020.*

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 [“It makes no sense to permit an individual to make a general, unfocused

request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific.”].) As written, the request is overbroad as there is no specific time frame other than “prior to October 15, 2020.”

County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

17. Provide those documents, reflecting communications on any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) prior to October 15, 2020.

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 [“It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific.”].) As written, the request is overbroad as there is no specific time frame other than “prior to October 15, 2020.”

County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

18. Provide those documents, reflecting management oversight on any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) prior to October 15, 2020.

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 [“It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific.”].) As written, the request is overbroad as there is no specific time frame other than “prior to October 15, 2020.”

County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

19. Provide those documents reflecting the identity of each person that has accessed the routers for the county's EMS and election information systems between October 15, 2020 and November 13, 2020.

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

20. *Provide those documents which identify all persons, not permanently employed by the County, who accessed servers or routers of the EMS and election information system between October 15, 2020 and November 14, 2020.*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

21. *Provide documents which identify all persons authorized by the county who accessed servers or routers of the EMS and election information system between October 15, 2020 and November 14, 2020.*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

22. *Provide those documents which identify all persons with USB or "flash drives" that were allowed access to any location where votes were tallied or processed in the County.*

Response: The County will not produce these records because records identifying employees who have access to voting machine tabulation storage devices are exempt from disclosure pursuant to Government Code §§6254(c), 6254(k), 6254.19, and 6255 and California Constitution Article I, section 1.

23. *Provide those documents which identify all persons with sign-on authentication authorization as a direct user to the county's EMS and election information system between September 15, 2020 and December 1, 2020.*

Response: The County will not produce these records because records identifying employees who have sign-on authorization are exempt from disclosure pursuant to Government Code §§6254(aa), 6254.19, and 6255, 2 CCR 19064 and California Constitution Article I, section 1.

24. *Provide the log files for the county's EMS and election information system with entries between September 15, 2020 and December 1, 2020.*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

25. *Provide those documents or records reflecting a network topology plan or map referencing the devices attached each other device within the county's EMS and election information system.*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

26. *Provide those documents or records reflecting the log monitoring tools used to send real-time alerts and notifications.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

27. *Provide the "real-time alerts and notifications", as referenced in 2 CCR 19064(e)(3) sent between September 1, 2020 through December 10, 2020.*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

28. *Provide those documents or records reflecting review, at any time, of "any errors, abnormal activities, and any system configuration changes", identified between September 1, 2020 through December 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

29. *Provide those documents which reflect "any errors" in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020.*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

30. *Provide those documents which reflect "abnormal activities" in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020.*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

31. *Provide those documents which reflect "system configuration changes" in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020.*

Response: This request seeks information security records that are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19 and 6255 and 2 CCR 19064.

32. *Provide those documents which reflect "unauthorized use" in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

33. *Provide those documents which reflect "suspected breach" in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

34. *Provide those documents which reflect "denial of service attack" in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

35. *Provide those documents reflecting a report to the Secretary of State Elections Division Help Desk of a "detected unauthorized use, suspected breach, or denial of service attack" between September 1, 2020 through December 10, 2020, as required under 2 CCR 19064 (g).*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

36. *All records reflecting change in registration status submitted to the statewide voter system by the county due to felony status processed between September 1, 2020, and November 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

37. *All records reflecting change in registration status submitted to the statewide voter system by the county due to federal felony status processed between September 1, 2020, and November 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

38. *All records reflecting change in registration status submitted to the statewide voter system by the county due to county death records reflecting voter to be deceased processed between September 1, 2020, and November 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

39. *All records reflecting the total cancellations directed by the Secretary of State processed by the county between September 1, 2020, and November 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

40. *All records reflecting searches of county felony records between September 1, 2020, and November 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

41. *All records reflecting searches of county death records between September 1, 2020, and November 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

42. *All records reflecting county searches of DMV Change of Address (DMV COA) between September 1, 2020, and November 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

43. *All records reflecting total submissions by changes in the registration record to the statewide voter registration system in accordance with Section 19061, between September 1, 2020, and November 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

44. *Those documents reflecting the dates of certifications of information provided to the Secretary of State according to 2 CCR § 19086(b).*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

45. *Those documents reflecting the date of generation of the official list extract from the statewide voter registration system for the purpose of conducting the 2020 General Election.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

46. *Those documents reflecting the date of each subsequent or supplemental rosters, after the initial roster for the purpose of conducting the 2020 General Election.*

Response: ROV has determined that it possesses no records responsive to this request.

47. *All certifications executed by any county election official for the November 3, 2020 General Election.*

Response: ROV has identified documents responsive to your request and said documents are uploaded to NextRequest for viewing and download.

48. *The number of ballots determined by the county through adjudication for the November 3, 2020 election.*

Response: ROV has identified documents responsive to your request and said documents are uploaded to NextRequest for viewing and download.

49. *All ballots duplicated by the county through adjudication for the November 3, 2020 election.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

50. *Those documents that identify the records of ballots duplicated for the November 3, 2020 election.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents. (date of the election).

51. *Those documents that identify the records of ballots adjudicated for the November 3, 2020 election..[sic]*

Response: ROV has identified documents responsive to your request and said documents are uploaded to NextRequest for viewing and download. To the extent that this request seeks production of the ballots themselves, such records are exempt from disclosure pursuant to Government Code §§6254(k) and 6255, the California Constitution Article II, section 7, and Elections Code §15370 (after ballots are counted and sealed, the elections official may not open any ballots nor permit any ballots to be opened), 15630 (all ballots, whether voted or not, and any other relevant material, may be examined as part of any recount if the voter filing the declaration requesting the recount so requests) and 17302 (packages containing ballots and identification envelopes shall be kept by the election official unopened and unaltered for six months from the date of the election).

52. *Those documents that identify the records of changes to ballots made for the November 3, 2020 election.*

Response: ROV has identified documents responsive to your request and said documents are uploaded to NextRequest for viewing and download. To the extent that this request seeks production of the ballots themselves, such records are exempt from disclosure pursuant to Government Code §§6254(k) and 6255, the California Constitution Article II, section 7, and Elections Code §15370 (after ballots are counted and sealed, the elections official may not open any ballots nor permit any ballots to be opened), 15630 (all ballots, whether voted or not, and any other relevant material, may be examined as part of any recount if the voter filing the declaration requesting the recount so requests) and 17302 (packages containing ballots and identification envelopes shall be kept by the election official unopened and unaltered for six months from the date of the election).

53. *All correspondence, whether such correspondence occurred by physical letter, email, text message, with any person employed by or affiliated with Dominion Voting Systems, Inc. between April 1, 2019 through December 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

54. *All correspondence, whether such correspondence occurred by physical letter, email, text message, with any person employed by or affiliated with the California Secretary of State's Office of Voting Systems Technology Assessment between April 1, 2019 through December 10, 2020.*

Response: County staff is still in the process of searching to determine if there are any records responsive to your request. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

55. *All electronic documents containing the phrase "Image Cast Remote 5.10".*

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 ["It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific."].) As written, the request is neither focused nor specific. For instance, the request is not limited or specific to electronic documents in a specific department, such as the ROV, or from/to a specific individual, nor is there any time limitation to the request but simply requests "all electronic documents" containing specific phrases. Searching the "whole" County system would take multiple months as there are numerous systems that are not related to or maintained by ROV. ROV assumes that requestor is seeking ROV electronic documents only, if this is incorrect provide an additional specific request. At this time ROV will only search its own ROV e-mails and ROV file shares to locate any potentially responsive documents. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for this documents. This search is anticipated to take a minimum of three weeks and a further response will be provided at that time.

56. *All electronic documents containing the phrase "Image Cast Remote 5.10A".*

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 ["It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific."].) As written, the request is neither focused nor specific. For instance, the request is not limited or specific to electronic documents in a specific department, such as the ROV, or from/to a specific individual, nor is there any time limitation to the request but simply requests "all electronic documents" containing specific phrases. Searching the "whole" County system would take multiple months as there are numerous

systems that are not related to or maintained by ROV. ROV assumes that requestor is seeking ROV electronic documents only, if this is incorrect provide an additional specific request. At this time ROV will only search its own ROV e-mails and ROV file shares to locate any potentially responsive documents. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for this documents. This search is anticipated to take a minimum of three weeks and a further response will be provided at that time.

57. All electronic documents containing the phrase "Image Cast Remote 5.2".

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 ["It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific."].) As written, the request is neither focused nor specific. For instance, the request is not limited or specific to electronic documents in a specific department, such as the ROV, or from/to a specific individual, nor is there any time limitation to the request but simply requests "all electronic documents" containing specific phrases. Searching the "whole" County system would take multiple months as there are numerous systems that are not related to or maintained by ROV. ROV assumes that requestor is seeking ROV electronic documents only, if this is incorrect provide an additional specific request. At this time ROV will only search its own ROV e-mails and ROV file shares to locate any potentially responsive documents. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for this documents. This search is anticipated to take a minimum of three weeks and a further response will be provided at that time.

58. All electronic documents containing the phrase "Suite 5.10A".

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 ["It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific."].) As written, the request is neither focused nor specific. For instance, the request is not limited or specific to electronic documents in a specific department, such as the ROV, or from/to a specific individual, nor is there any time limitation to the request but simply requests "all electronic documents" containing specific phrases. Searching the "whole" County system would take multiple months as there are numerous systems that are not related to or maintained by ROV. ROV assumes that

requestor is seeking ROV electronic documents only, if this is incorrect provide an additional specific request. At this time ROV will only search its own ROV e-mails and ROV file shares to locate any potentially responsive documents. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for this documents. This search is anticipated to take a minimum of three weeks and a further response will be provided at that time.

59. All electronic documents containing the phrase "Suite 5.10".

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 ["It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific."].) As written, the request is neither focused nor specific. For instance, the request is not limited or specific to electronic documents in a specific department, such as the ROV, or from/to a specific individual, nor is there any time limitation to the request but simply requests "all electronic documents" containing specific phrases. Searching the "whole" County system would take multiple months as there are numerous systems that are not related to or maintained by ROV. ROV assumes that requestor is seeking ROV electronic documents only, if this is incorrect provide an additional specific request. At this time ROV will only search its own ROV e-mails and ROV file shares to locate any potentially responsive documents. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for this documents. This search is anticipated to take a minimum of three weeks and a further response will be provided at that time.

60. All electronic documents containing the phrase "Suite 5.2".

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 ["It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific."].) As written, the request is neither focused nor specific. For instance, the request is not limited or specific to electronic documents in a specific department, such as the ROV, or from/to a specific individual, nor is there any time limitation to the request but simply requests "all electronic documents" containing specific phrases. Searching the "whole" County system would take multiple months as there are numerous systems that are not related to or maintained by ROV. ROV assumes that requestor is seeking ROV electronic documents only, if this is incorrect provide an additional specific request. At this time ROV will only search its own ROV e-mails and ROV file shares to locate any potentially responsive

documents. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for this documents. This search is anticipated to take a minimum of three weeks and a further response will be provided at that time.

61. All electronic documents containing the phrase "ImageCast Evolution 5.10.9.3".

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 ["It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific."].) As written, the request is neither focused nor specific. For instance, the request is not limited or specific to electronic documents in a specific department, such as the ROV, or from/to a specific individual, nor is there any time limitation to the request but simply requests "all electronic documents" containing specific phrases. Searching the "whole" County system would take multiple months as there are numerous systems that are not related to or maintained by ROV. ROV assumes that requestor is seeking ROV electronic documents only, if this is incorrect provide an additional specific request. At this time ROV will only search its own ROV e-mails and ROV file shares to locate any potentially responsive documents. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for this documents. This search is anticipated to take a minimum of three weeks and a further response will be provided at that time.

62. All electronic documents containing the phrase " ImageCast ICX 5.10.11.11.".

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 ["It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific."].) As written, the request is neither focused nor specific. For instance, the request is not limited or specific to electronic documents in a specific department, such as the ROV, or from/to a specific individual, nor is there any time limitation to the request but simply requests "all electronic documents" containing specific phrases. Searching the "whole" County system would take multiple months as there are numerous systems that are not related to or maintained by ROV. ROV assumes that requestor is seeking ROV electronic documents only, if this is incorrect provide an additional specific request. At this time ROV will only search its own ROV e-mails and ROV file shares to locate any potentially responsive documents. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege

for this documents. This search is anticipated to take a minimum of three weeks and a further response will be provided at that time.

63. All electronic documents containing the phrase "Eric Coomer"

Response: The Public Records Act request is vague and impermissibly overbroad in both scope and time. The Public Records Act requires that the request be focused and specific. (See, e.g. (Rogers v. Superior Court (1993) 19 Cal.App.4th 469, 481 ["It makes no sense to permit an individual to make a general, unfocused request for records to the public agency which will then be compelled to deny it, thereby ensuring litigation. The request to the agency must itself be focused and specific."].) As written, the request is neither focused nor specific. For instance, the request is not limited or specific to electronic documents in a specific department, such as the ROV, or from/to a specific individual, nor is there any time limitation to the request but simply requests "all electronic documents" containing specific phrases. Searching the "whole" County system would take multiple months as there are numerous systems that are not related to or maintained by ROV. ROV assumes that requestor is seeking ROV electronic documents only, if this is incorrect provide an additional specific request. At this time ROV will only search its own ROV e-mails and ROV file shares to locate any potentially responsive documents. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for this documents. This search is anticipated to take a minimum of three weeks and a further response will be provided at that time.

County staff is still in the process of searching to determine if there are any records responsive to your requests. Upon location of any responsive documents, the County will produce the documents unless there is an applicable exemption or privilege for these documents.

Please note that due to orders of the Governor suspending non-essential operations and ordering workers to remain in their homes, the County has limited staff available to respond to Public Records Act requests. Thus, although the County will make every reasonable effort to respond to Public Records Act requests as soon as possible, the County may require a reasonable amount of additional time to fulfill Public Records Act requests under the current circumstances. The County currently expects to provide an additional response to this request by approximately February 12, 2021.

If there are records responsive to your request, please be aware that, depending on the nature of the records and/or information sought, some or all of the records may contain information that is exempt from disclosure under one or more subdivision of Government Code section 6254, or under Government Code section 6255, or pursuant to some other exemption or privilege. If only a portion of a requested record is exempt from disclosure, the record will be provided for your inspection or copying with the exempt information redacted.

If you have requested copies of records, generally the cost of each 8½ x 11 inch black and white copy is 10 cents per page side. Larger formatted copies, color copies, and other special copies will cost more per page. If you have requested records or information in electronic format, we

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will be in further contact with you about whether this is possible and whether there are any associated costs.

Very truly yours,
MICHELLE D. BLAKEMORE
County Counsel

A handwritten signature in cursive script that reads "Jolena Grider". The signature is written in black ink and is positioned above the printed name and title.

JOLENA E. GRIDER
Deputy County Counsel