



COUNTY OF LOS ANGELES
OFFICE OF THE COUNTY COUNSEL

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February 9, 2021

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Scott A. McMillan
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Re: Public Records Act Request

Dear Mr. McMillan:

This is in further response to your Public Records Act ("PRA") request submitted to the Los Angeles County Registrar-Recorder/County Clerk ("Registrar") on December 30, 2020, requesting certain records regarding the November 3, 2020 General Election and forwarded to this office for response.

On January 11, 2021, pursuant to Government Code section 6253(c)(4), the County extended its time to respond to the PRA based on the existence of unusual circumstances, including the ongoing and unprecedented COVID-19 pandemic and public health emergency, the need to identify, locate, and collect potentially responsive records, and the need to review any records that may be located to determine if they can be disclosed.

In the County's January 26, 2021 response, the County addressed Request Nos. 44, 47, and 53-63. The County also stated that it was continuing to search and review records that are potentially responsive to your remaining requests and provide you with a determination as to whether or not the County was able to identify any disclosable public records.

The County is in receipt of your application to receive voter and election file information. As previously advised on February 2, 2021, the cost to receive the Countywide voter registration data is \$146.00, and the cost to receive the voting history data for the November 3, 2020 General Election is \$54.00. To receive this data, please submit a check or money order for \$200.00 to the Los Angeles County Registrar-Recorder/County Clerk, ATTN: Election

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Information, 12400 Imperial Highway #2013, Norwalk, California 90650. While you have requested this information under the PRA, please be informed that this information is confidential and subject to limitations on further disclosure, as indicated in the application and pursuant to the California Elections Code, Code of Regulations and Government Code, which must be signed under penalty of perjury.

Many of the request for documents do not describe records in a way that is consistent with how the Registrar maintains records or information is kept in an electronic format and will require further clarification as to the terms of your request. When requested information is held in an electronic format and the request would require data compilation, extraction or programming to produce the record, "the requester shall bear the cost of producing a copy of the record, including the costs to construct a record, and the cost of programming and computer services necessary to produce a copy of the record." (Gov. Code, § 6253.9(b)(2).) Please contact the undersigned to provide the requested clarification and to make arrangements to pay the estimated cost as indicated. Any overpayment or underpayment will be settled at the time the records are produced.

Under the Public Records Act, the County has a duty to disclose records to the public to the extent the County understands the request, responsive records exist and can be located, and the information contained in the responsive records are not subject to, in whole or in part, legal exemptions from disclosure. However, the Public Records Act does not require the County to answer questions or to create a record that does not exist at the time of the request. (*See* Gov. Code, § 6252(e); *Haymie v. Superior Court* (2001) 26 Cal.4th 1061, 1075.) As indicated above and outlined below, some records may require that you provide further clarification and may require data compilation, extraction or programming to produce the record, or contain information exempt from disclosure that will not be disclosed.

With respect to Request 1, for "documents identifying, by date, time and means, all synchronization transmissions between the California Secretary of State and the county Registrar [sic] of Voters" is overbroad without any limitation as to time or scope. Furthermore, "date, time and means" or "all synchronization transmissions" are not records that are available in summary, but the Registrar may be able to produce requested records through data compilation, extraction, or programming, which you are required to pay pursuant to Government Code section 6253.9(b). Please contact the undersigned to make arrangements to pay the estimated cost. Any overpayment or underpayment will be settled at the time the records are produced. Confidential voter registration information is subject to

the application for voter registration data pursuant to Elections Code section 2188 and 2 CCR section 19001 et seq.

With respect to Request 2, for "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" is overbroad without any limitation as to time or scope, and is ambiguous as to the intended meaning of the words "valid" and "invalid." Invalid registration records are not moved between the Registrar's Election Management System ("EMS") and the Statewide voter registration system. Please consider providing a date range for the requested synchronization transmissions. Furthermore, "results" of "synchronization transmissions" are not records that are available, but the Registrar may be able to produce requested records through data compilation, extraction, or programming, which you are required to pay pursuant to Government Code section 6253.9(b). Please contact the undersigned to provide further clarification regarding the terms of the request so we can assist you in making a focused and effective request that reasonably describes an identifiable public record. (Gov. Code, § 6253.1.)

With respect to Request 3, for "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," it would require data compilation, extraction, or programming to produce a record, which you are required to pay pursuant to Government Code section 6253.9(b). Please contact the undersigned to make arrangements to pay the estimated cost. Any overpayment or underpayment will be settled at the time the records are produced. Confidential voter registration information is subject to the application for voter registration data pursuant to Elections Code section 2188 and 2 CCR section 19001 et seq.

With respect to Request 4, for "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" it would require data compilation, extraction, or programming to produce a record, which you are required to pay pursuant to Government Code section 6253.9(b). Please contact the undersigned to make arrangements to pay the estimated cost. Any overpayment or underpayment will be settled at the time the records are produced. Confidential voter registration information is subject to the application for voter registration data pursuant to Elections Code section 2188 and 2 CCR section 19001 et seq.

With respect to Request 5, for "documents identifying where, by geographic location, ballots were counted in the County between October 15, 2020, through November 30, 2020" please be advised that the Registrar counted ballots at its Tally Operations Center located at 9150 Imperial Highway, Downey, California 90242.

With respect to Request 6, for "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)" the request seeks information security records or other confidential information, that would reveal vulnerabilities to the County's information technology and security systems, therefore, the records are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, and will not be disclosed. However, the Registrar has provided a summary of its security system and processes designed to protect from unknown threats that include malware and suspicious communications and vulnerabilities that detects, alerts and blocks unwanted programs or program threats.

With respect to Request 7, for "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)" as indicated in response to Request No. 6, the request seeks information security records or other confidential information, that would reveal vulnerabilities to the County's information technology and security systems, therefore, the records are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, and will not be disclosed. However, the Registrar has provided a summary of its security system and processes designed to protect from unknown threats that include malware and suspicious communications and vulnerabilities that detects, alerts and blocks unwanted programs or program threats.

With respect to Request 8, for "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)" as indicated in response to Request Nos. 6-7, the request seeks information security records or other confidential information, that would reveal

vulnerabilities to the County's information technology and security systems, therefore, the records are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, and will not be disclosed. However, the Registrar has provided a summary of its security system and processes designed to protect from unknown threats that include malware and suspicious communications and vulnerabilities that detects, alerts and blocks unwanted programs or program threats.

With respect to Request 9, for "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" the Registrar has not located any records responsive to your request.

With respect to Request 10, for "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)" the request seeks information security records or other confidential information that would reveal vulnerabilities to the County's information technology and security systems, therefore, the records are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, and will not be disclosed.

With respect to Request 11, for "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" the Registrar has not located any records responsive to your request.

With respect to Request 12, for "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" the Registrar has not located any records responsive to your request.

With respect to Request 13, for "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" the Registrar has not located any records responsive to your request.

With respect to Request 14, for "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)" the Registrar has identified responsive records. However, to the extent the request seeks information security records or other confidential information that would reveal potential vulnerabilities to the County's information technology and security systems, the records are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, and will not be disclosed.

With respect to Request 15, for "documents, reflecting training on any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) prior to October 15, 2020" the Registrar has identified responsive records. However, to the extent the request seeks information security records or other confidential information that would reveal potential vulnerabilities to the County's information technology and security systems, the records are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, and will not be disclosed.

With respect to Request 16, for "documents, reflecting roles on any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) prior to October 15, 2020," the Registrar has identified responsive records. However, to the extent the request seeks information security records or other confidential information that would reveal potential vulnerabilities to the County's information technology and security systems, the records are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, and will not be disclosed.

With respect to Request 17, for "documents, reflecting communications on any incident response infrastructure (e.g., plans, defined roles, training, communications, and management oversight) prior to October 15, 2020" the Registrar has not located any records responsive to your request.

With respect to Request 18, for "documents, reflecting management oversight on any incident response infrastructure (e.g., plans, defined roles, training communications, and management oversight) prior to October 15, 2020" the Registrar has located records responsive to your request. However, to the extent the request seeks information security records or other confidential information that would reveal potential vulnerabilities to the County's information technology and security systems, the records are exempt from disclosure pursuant

to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, and will not be disclosed.

With respect to Request 19, for "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" the Registrar cannot access routers maintained by the County's Internal Services Department and the Registrar has not located any records responsive to your request.

With respect to Request 20, for "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" as indicated in response to Request No. 19, the Registrar cannot access routers maintained by the County's Internal Services Department and the Registrar has not located any records responsive to your request.

With respect to Request 21, for "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" as indicated in response to Request Nos. 19-20, the Registrar cannot access routers maintained by the County's Internal Services Department. As to the remainder of your request, the Registrar has located responsive records. However, records containing personal and/or private information of individuals are exempt from disclosure. (Cal. Const., art. 1, § 1; Gov. Code § 6254(c).) Records that contain personal identification information, personnel, medical, or similar files and information, like employee identification numbers, the disclosure of which would constitute an unwarranted invasion of personal privacy, are exempt. (*City of San Jose v. Superior Court* (1999) 74 Cal.App.4th 1008, 1019-1020; Gov. Code, §§ 6255, 6254(c).) Thus, any record containing personnel information is exempt from disclosure and has been redacted.

With respect to Request 22, for "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" the Registrar has located records responsive to your request.

With respect to Request 23, for "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" the Registrar has located records responsive to your request. However, records containing personal and/or private information of individuals are exempt from

disclosure. (Cal. Const., art. 1, § 1; Gov. Code, § 6254(c).) Records that contain personal identification information, personnel, medical, or similar files and information, like employee identification numbers, the disclosure of which would constitute an unwarranted invasion of personal privacy, are exempt. (*City of San Jose v. Superior Court* (1999) 74 Cal.App.4th 1008, 1019-1020; Gov. Code, §§ 6255, 6254(c).) Thus, any record containing personnel information is exempt from disclosure and has been redacted.

With respect to Request 24, for "log files for the county's EMS and election information system with entries between September 15, 2020 and December 1, 2020" the Registrar is continuing to review records potentially responsive to your request. However, to the extent the request seeks information security records or other confidential information that would reveal potential vulnerabilities to the County's information technology and security systems, the records are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, and will not be disclosed.

With respect to Request 25, for "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" the request seeks information security records or other confidential information that would reveal vulnerabilities to the County's information technology and security systems, the records are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, and will not be disclosed.

With respect to Request 26, for "documents or records reflecting the log monitoring tools used to send real-time alerts and notifications" as indicated in response to Request Nos. 6-8, the request seeks information security records or other confidential information that would reveal vulnerabilities to the County's information technology and security systems, therefore, the records are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, and will not be disclosed. However, the Registrar has provided a summary of its security system and processes designed to protect from unknown threats that include malware and suspicious communications and vulnerabilities that detects, alerts and blocks unwanted programs or program threats.

With respect to Request 27, for "the 'real-time alerts and notifications', as referenced in 2 CCR 19064(e)(3) sent between September 1, 2020 through December 10, 2020" as indicated in response to Request Nos. 6-8, and 26, the request seeks information security records or other confidential information that would reveal vulnerabilities to the County's information technology and security

systems, therefore, the records are exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, and will not be disclosed. However, the Registrar has provided a summary of its security system and processes designed to protect from unknown threats that include malware and suspicious communications and vulnerabilities that detects, alerts and blocks unwanted programs or program threats.

With respect to Request 28, for "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" the Registrar has not located any records responsive to your request.

With respect to Request 29, for "documents which reflect 'any errors' in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020" the Registrar has located records responsive to your request. However, records that contain information security records or other confidential information that is exempt from disclosure pursuant to Government Code sections 6254(aa), 6254.19, and 6255, and 2 CCR section 19064, such as Internet Protocol Addresses, is confidential and will not be disclosed.

With respect to Request 30, for "documents which reflect 'abnormal activities' in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020" besides the records provided in response to Request No. 29, the Registrar has not located any other records responsive to your request.

With respect to Request 31, for "documents which reflect 'system configuration changes' in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020" the Registrar has not located any records responsive to your request.

With respect to Request 32, for "documents which reflect 'unauthorized use' in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020" the Registrar has not located any records responsive to your request.

With respect to Request 33, for "documents which reflect 'suspected breach' in the county's EMS and election information system identified between September 1, 2020 through December 10, 2020" the Registrar has not located any records responsive to your request.

With respect to Request 34, for "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," the Registrar has not located any records responsive to your request.

With respect to Request 35, for "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)" the Registrar has not located any records responsive to your request.

With respect to Request 36, for "[a]ll 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" it would require data compilation, extraction, or programming to produce a record, which you are required to pay pursuant to Government Code section 6253.9(b). Please contact the undersigned to make arrangements to pay the estimated cost. Any overpayment or underpayment will be settled at the time the records are produced. Confidential voter registration information is subject to the application for voter registration data pursuant to Elections Code section 2188 and 2 CCR section 19001 et seq.

With respect to Request 37, for "[a]ll 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" as indicted in response to Request 36, it would require data compilation, extraction, or programming to produce a record, which you are required to pay pursuant to Government Code section 6253.9(b). Please contact the undersigned to make arrangements to pay the estimated cost. Any overpayment or underpayment will be settled at the time the records are produced. Confidential voter registration information is subject to the application for voter registration data pursuant to Elections Code section 2188 and 2 CCR section 19001 et seq. The County's responsive records do not identify whether the change in registration status is due to a State versus a federal felony.

With respect to Request 38, for "[a]ll 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" it would require data compilation, extraction, or programming to produce a record, which you are required to pay pursuant to Government Code section 6253.9(b). Please contact the undersigned to make arrangements to pay the estimated cost. Any overpayment or

underpayment will be settled at the time the records are produced. Confidential voter registration information is subject to the application for voter registration data pursuant to Elections Code section 2188 and 2 CCR section 19001 et seq.

With respect to Request 39, for "[a]ll records reflecting the total cancellations directed by the Secretary of State processed by the county between September 1, 2020, and November 10, 2020" it would require data compilation, extraction, or programming to produce a record, which you are required to pay pursuant to Government Code section 6253.9(b). Please contact the undersigned to make arrangements to pay the estimated cost. Any overpayment or underpayment will be settled at the time the records are produced. Confidential voter registration information is subject to the application for voter registration data pursuant to Elections Code section 2188 and 2 CCR section 19001 et seq.

With respect to Request 40, for "[a]ll records reflecting searches of county felony records between September 1, 2020, and November 10, 2020" the Registrar has not located any records responsive to your request.

With respect to Request 41, for "[a]ll records reflecting searches of county death records between September 1, 2020, and November 10, 2020" the Registrar has not located any records responsive to your request.

With respect to Request 42, for "[a]ll records reflecting county searches of DMV Change of Address (DMV COA) between September 1, 2020, and November 10, 2020" the Registrar has not located any records responsive to your request.

With respect to Request 43, for "[a]ll 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" the Registrar does not have existing records that contain the requested information, although the Registrar may be able to produce requested records through data compilation, extraction, or programming, which you are required to pay pursuant to Government Code section 6253.9(b). Confidential voter registration information is subject to the application for voter registration data pursuant to Elections Code section 2188 and 2 CCR section 19001 et seq.

With respect to Request 45, for "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" the Registrar has not located any records responsive to your request, as the Registrar uses electronic

poll books as described in Elections Code section 2550, which are constantly updated.

With respect to Request 46, for "documents reflecting the date of each subsequent or supplemental rosters, after the initial roster for the purpose of conducting the 2020 General Election" the Registrar has not located any records responsive to your request, as the Registrar uses electronic poll books as described in Elections Code section 2550, which are constantly updated.

With respect to Request 48, for "[t]he number of ballots determined by the county through adjudication for the November 3, 2020 election" to the extent this request seeks production of the ballots themselves, please be informed that access to ballots after certification is prohibited under California Elections Code section 15370 which states, "After ballots are counted and sealed, the elections official may not open any ballots nor permit any ballots to be opened except as permitted in Sections 15303 and 15304, or in the event of a recount." California Elections Code section 17301(b)(1) states that packages containing the voted ballots shall be kept by the elections official, unopened and unaltered, for 22 months from the date of the election. Moreover, ballots are exempt from disclosure under the Public Records Act. (See Government Code sections 6254(k) and 6255; California Constitution, article II, Section 7; and *Citizens Oversight, Inc. v. Vu* (2019) 35 Cal.App.5th 612.) Please contact the undersigned to provide further clarification of your request.

With respect to Request 49, for "[a]ll ballots duplicated by the county through adjudication for the November 3, 2020 election" to the extent this request seeks production of the ballots themselves, please be informed that access to ballots after certification is prohibited under California Elections Code section 15370 which states, "After ballots are counted and sealed, the elections official may not open any ballots nor permit any ballots to be opened except as permitted in Sections 15303 and 15304, or in the event of a recount." California Elections Code section 17301(b)(1) states that packages containing the voted ballots shall be kept by the elections official, unopened and unaltered, for 22 months from the date of the election. Moreover, ballots are exempt from disclosure under the Public Records Act. (See Government Code sections 6254(k) and 6255; California Constitution, article II, Section 7; and *Citizens Oversight, Inc. v. Vu* (2019) 35 Cal.App.5th 612.)

With respect to Request 50, for "documents that identify the records of ballots duplicated for the November 3, 2020 election" the Registrar has located records responsive to your request.

With respect to Request 51, seeking "documents that identify the records of ballots adjudicated for the November 3, 2020 election" as indicated in response to Request Nos. 48-49, to the extent this request seeks production of the ballots themselves, please be informed that access to ballots after certification is prohibited under California Elections Code section 15370 which states, "After ballots are counted and sealed, the elections official may not open any ballots nor permit any ballots to be opened except as permitted in Sections 15303 and 15304, or in the event of a recount." California Elections Code section 17301(b)(1) states that packages containing the voted ballots shall be kept by the elections official, unopened and unaltered, for 22 months from the date of the election. Moreover, ballots are exempt from disclosure under the Public Records Act. (See Government Code sections 6254(k) and 6255; California Constitution, article II, Section 7; and *Citizens Oversight, Inc. v. Vu* (2019) 35 Cal.App.5th 612.)

With respect to Request 52, for "documents that identify the records of changes to ballots made for the November 3, 2020 election" the Registrar has not located any records responsive to your request besides the ballots themselves. To the extent this request seeks production of the ballots themselves, as indicated in response to Request Nos. 48-49, and 51, actual ballots are exempt from disclosure and will not be disclosed.

The non-exempt responsive records are attached.

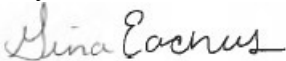
As to any outstanding request, please note that due to the current unprecedented situation stemming from the COVID-19 pandemic, as reflected in Governor Newsom's and the County's Public Health Officer Orders ("Orders"), the typical record search cannot occur with regular pace. During the pendency of the social distancing mandates and the Orders, resource allocation has been altered accordingly to ensure that County residents receive essential services in a manner that protects public health and safety. As stated, Government Code section 6255 allows an agency to withhold a record by demonstrating that, "the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record." In this instance, additional time is needed to respond to your request for the aforementioned reasons. In light of the foregoing, our Office will work with the Registrar to produce any responsive non-exempt records. The County reserves its right to assert all applicable privileges/doctrines and exemptions.

Scott A. McMillan
February 9, 2021
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If you have any questions, please contact me at (213) 974-1832. Thank you.

Very truly yours,

RODRIGO A. CASTRO-SILVA
County Counsel

By 

GINA EACHUS
Senior Deputy County Counsel
Government Services Division

APPROVED AND RELEASED:



NICOLE DAVIS TINKHAM
Acting Chief Deputy

GE:eb

Attachments

c: Dean C. Logan, Registrar-Recorder/County Clerk