

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Kishwer Vikaas Barrica 1111 Howe Ave., #150 Sacramento, CA 95825		FOR COURT USE ONLY FILED Superior Court Of California, Sacramento 04/21/2017 mrubalcaba By _____, Deputy Case Number: 34-2017-80002576
TELEPHONE NO.: 916.736.0616 FAX NO.: 916-736-2645 ATTORNEY FOR (Name): Coalition of California Welfare Rights Organizations, Inc.		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento STREET ADDRESS: 720 9th Street MAILING ADDRESS: 720 9th Street CITY AND ZIP CODE: Sacramento 95814 BRANCH NAME: Civil Division		
CASE NAME: CCWRO v. Lightbourne and CA Department of Social Services		
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		
Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)		
CASE NUMBER: 34-2017-80002576 JUDGE: _____ DEPT: _____		

Items 1-6 below must be completed (see instructions on page 2).

1. Check **one** box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input checked="" type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
--	---	--

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☒ nonmonetary; declaratory or injunctive relief c. ☐ punitive
4. Number of causes of action (specify): _____
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: April 21, 2017

Kishwer Vikaas Barrica

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

COPY

GRACE GALLIGHER (S.B.N. 106687)
KISHWER VIKAAS BARRICA (S.B.N. 296576)
Coalition of California Welfare Rights Organizations, Inc.
1111 Howe Ave, Suite 150
Sacramento, CA 95825
(916) 736-0616 (Phone)
(916) 736-2645 (Fax)

Attorneys for Petitioner

FILED
Superior Court Of California,
Sacramento
04/21/2017
mrubalcaba
By _____, Deputy
Case Number:
24-2017-80002576

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

**COALITION OF CALIFORNIA
WELFARE RIGHTS ORGANIZATIONS,
INC.,**

Petitioner,

v.

**WILL LIGHTBOURNE, in his official
capacity as Director, California Department of
Social Services and CALIFORNIA
DEPARTMENT OF SOCIAL SERVICES,**

Respondents.

Case No.:

**VERIFIED PETITION FOR
WRIT OF MANDATE**

[California Constitution Art. 1 § 3; Govt. Code
§§ 6250, *et seq.*; Cal. Code of Civ. Proc. §
1085]

INTRODUCTION

1. The California Legislature enacted the California Public Records Act, ("CPRA") Govt. C. §§ 6250 *et seq.* in 1968. It provides that "every person has a right to inspect any public record, except as hereafter provided. (Govt. C. § 6253(a).) The California Public Records Act provides that "access to information concerning the conduct of the people's business is a fundamental and necessary right of every person in this state." (Govt. C. § 6250.)

2. Petitioner COALITION OF CALIFORNIA WELFARE RIGHTS ORGANIZATIONS, INC. (CCWRO) is a statewide non-profit organization based in Sacramento, California, that advocates for the rights of social services recipients. As part of its advocacy, CCWRO routinely uses

GRACE GALLIGHER (S.B.N. 106687)
KISHWER VIKAAS BARRICA (S.B.N. 296576)
Coalition of California Welfare Rights Organizations, Inc.
1111 Howe Ave, Suite 150
Sacramento, CA 95825
(916) 736-0616 (Phone)
(916) 736-2645 (Fax)

Attorneys for Petitioner

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

**COALITION OF CALIFORNIA
WELFARE RIGHTS ORGANIZATIONS,
INC.,**

Petitioner,

v.

**WILL LIGHTBOURNE, in his official
capacity as Director, California Department of
Social Services and CALIFORNIA
DEPARTMENT OF SOCIAL SERVICES,**

Respondents.

Case No.:

**VERIFIED PETITION FOR
WRIT OF MANDATE**

[California Constitution Art. 1 § 3; Govt. Code
§§ 6250, *et seq.*; Cal. Code of Civ. Proc. §
1085]

INTRODUCTION

1. The California Legislature enacted the California Public Records Act, ("CPRA") Govt. C. §§ 6250 *et seq.* in 1968. It provides that "every person has a right to inspect any public record, except as hereafter provided. (Govt. C. § 6253(a).) The California Public Records Act provides that "access to information concerning the conduct of the people's business is a fundamental and necessary right of every person in this state." (Govt. C. § 6250.)

2. Petitioner COALITION OF CALIFORNIA WELFARE RIGHTS ORGANIZATIONS, INC. (CCWRO) is a statewide non-profit organization based in Sacramento, California, that advocates for the rights of social services recipients. As part of its advocacy, CCWRO routinely uses

1 public records requests to gather information about the procedures, policies, and practices, of local
2 and state agencies. It then reports this information in its regularly published reports, which are
3 available on its website, for the benefit of legal services field programs throughout California. The
4 responses to the PRA requests are also used to respond to telephone calls from legal aid staff who
5 need assistance in dealing with client issues concerning the foster care program supervised by
6 Children & Family Services Division of the California Department of Social Services (CDSS). To
7 properly assist California legal aid programs, CCWRO, Inc. must have access to public records
8 pertaining to the procedures, policies, and practices of the foster care program overseen by California
9 Department of Social Service's Children & Family Services Division.
10

11
12 3. Between December 2015 and March 2017, Petitioner submitted 15 monthly California
13 Public Records Act requests for public documents to the California Department of Social Services.
14 During this period, CDSS did not comply with the mandatory requirements of the California Public
15 Records Act.
16

17 4. CDSS has engaged in what can only be described as deliberately obstructive efforts by
18 failing to comply with the mandates of the California Public Records Act. (Govt. C. §§ 6250 (d))
19 Respondents' conduct unnecessarily, improperly, and illegally obstructs Petitioner's access to public
20 records and information concerning the operation of the Children & Family Services Division's Child
21 Welfare Services program and its various components.
22

23 5. Through the instant lawsuit, Petitioner seeks a traditional writ of mandamus pursuant to
24 CCP § 1085, Govt. C. §§ 6250, *et seq.*, and Art. 1, § 3 of the California State Constitution ordering
25 California Department of Social Services ("CDSS") and its Director, Will Lightbourne (collectively
26 "Respondents"), to comply with the requirements of the California Public Records Act and to
27 produce all relevant nonexempt records that the Petitioner has requested.
28

1 prescribed by law including the California Public Records Act. (Welf. & Inst. Code § 10553.)

2 Respondent Lightbourne is sued in his official capacity as the director of CDSS.

3 12. Petitioner is informed and believes and on that basis alleges that the actions complained
4 of herein were carried out by and under the direction and control of Respondents, through their agents
5 and/or employees, and done within the scope of said agency and/or employment of Respondent
6 Lightbourne.
7

8 CHILDREN & FAMILY SERVICES DIVISION

9 13. Within CDSS, the Children and Family Services Division is responsible for ensuring the
10 "safety, permanency and well-being" of California children and providing oversight of the foster care
11 and adoptions programs. (Welf. & Inst. Code § 300.2.) Respondents are mandated to provide "social
12 services which are directed toward the accomplishment of the following purposes: (a) protecting and
13 promoting the welfare of all children, including handicapped, homeless, dependent, or neglected
14 children; (b) preventing or remedying, or assisting in the solution of problems which may result in,
15 the neglect, abuse, exploitation, or delinquency of the children; (c) preventing the unnecessary
16 separation of children from their families by identifying family problems, assisting families in
17 resolving their problems, and preventing breakup of the family where the prevention of child removal
18 is desirable and possible; ... Child welfare services may include, but are not limited to: ... emergency
19 shelter care" (Welf. & Inst. Code §§ 16501.) (*Hanson v. Department of Social Services* (1997) 193
20 Cal. App. 3d 286)
21
22

23 14. Child welfare services consists of three components: Preplacement Preventive Services
24 (Welf. & Inst. Code §§ 16501.1); Family Reunification Program (Welf. & Inst. Code §§ 16501.2);
25 and Permanent Placement (Welf. & Inst. Code §§ 16501.3). Preplacement Preventive Services are
26 "designed to help children remain with their families by preventing or eliminating the need for
27
28

1 removal." This component contains two subparts, the first of which, the Emergency Response
2 Program, provides, "... intake services and crisis intervention to maintain the child safely in his or her
3 own home or to protect the safety of the child." (Welf. & Inst. Code §§ 16501.1, subd. (a).) The
4 second component, the Family Maintenance Program, "... is designed to provide time-limited
5 protective services to prevent or remedy neglect, abuse, or exploitation, for the purposes of
6 preventing separation of children from their families." (Welf. & Inst. Code §§ 16501.1, subd. (b).
7 (*Hanson v. Department of Social Services* (1987) 193 Cal. App. 3d 286)

9 15. Under the provisions of the Welfare & Institution Code, Respondents oversee and review
10 child welfare systems in all 58 California counties and "maximize compliance with federal
11 regulations. (Welf. & Inst. Code §1601.2(a)(b).) This includes both foster care and adoptions. (Welf.
12 & Inst. Code §§ 11440.)

14 16. Petitioner alleges on information and belief that in performance of their duties,
15 Respondents regularly issue documents/writings including, but not limited to, policy directives,
16 publications, newsletters, reports for foster care throughout December 1, 2015 up to the present,
17 which not available on the CDSS website or the various counties websites. These policy directives,
18 publications, newsletters, reports and other documents/writings constitute public records that every
19 member of the public of the State of California has the right to review. The necessity of this review
20 is heightened when the various directives impact a social services recipient's ability to effectively
21 access or navigate the child welfare programs.

23 17. For instance, CDSS regularly distributes All-County Information Notices (ACINs) to the
24 individual 58 counties' child welfare services providers that provide announcements, updates and
25 clarifications on state laws regulated by the state of California. Questions from individual county
26 providers about how to apply regulations written about in documents such as All-County Information
27
28

1 Notices are documented by the Department. Access to California Department of Social Service's
2 recordings of such policy interpretations requests would provide the legal aid organizations Petitioner
3 serves with clarification on how to better provide consumers in those counties with quality legal
4 assistance.

6 CALIFORNIA PUBLIC RECORDS ACT STATUTE

7 18. The Legislature enacted the California Public Records Act to balance the privacy rights
8 of individuals with public access to information concerning the conduct of the people's business.
9 (Govt. C. § 6250.)

10 19. The California Public Records Act is very comprehensive. Govt. C. §§ 6250 *et seq.*
11 defines terms relevant to this action including "public records," "state agency," and "writing".
12

13 20. The California Public Records Act makes all non-exempt, state government agency
14 records including reasonably segregable, non-exempt portions of otherwise exempt records in any
15 format or medium subject to public inspection during office hours, and subject to being made
16 available for copying. (Govt. C. § 6253.)
17

18 21. The California Public Records Act requires that, within ten days of receipt of a request
19 for a copy of records, California Department of Social Services must determine whether the request,
20 in whole or part, seeks copies of disclosable public records in the possession of the agency and shall
21 promptly notify the person making the request of the determination and the reasons therefor. (Govt.
22 C. § 6253(c).)
23

24 22. Under Govt. C. § 6253(c), California Department of Social Services may extend the
25 initial ten-day response period for up to fourteen (14) days under certain circumstances:

- 26 (a) The need to search for and collect the requested records from field
27 facilities or other establishments that are separate from the office
28 processing the request.

1 (b) The need to search for, collect, and appropriately examine a voluminous
2 amount of separate and distinct records that are demanded in a single
3 request.

4 (c) The need for consultation, which shall be conducted with all practicable
5 speed, with another agency having substantial interest in the
6 determination of the request or amount two or more components of the
7 agency having substantial subject matter interest therein.

8 (d) The need to compile data, to write programming language or a computer
9 program, or to construct a computer report to extract data.”

10 23. However, when an extension is requested, the agency must specify a date on which a
11 determination is expected to be dispatched. (*Id.*) Despite the extension, California Department of
12 Social Services is required to make public records “promptly available” to the requester and is not
13 permitted to delay or obstruct the production of public records. (Govt. C. §§ 6253(b), (d).)

14 24. To the extent that California Department of Social Services asserts certain records are
15 exempt from disclosure by an express provision of law, California Department of Social Services is
16 required to: 1) justify the withholding by providing the reason for the exemption, with reference to
17 specific provisions of the California Public Records Act (Govt. C. § 6255(a)); and 2) make “[a]ny
18 reasonably segregable portion” available for inspection after removing “the portions that are
19 exempted by law.” (Govt. C. § 6253(a).)

20 25. If CDSS denies the California Public Records Act request, it must identify the names and
21 titles or positions of each person responsible for the denial. (Govt. C. § 6253(d).)

22 26. Under Govt. C. § 6253(b), only the direct costs of duplication are recoverable by a state
23 agency. Courts consistently hold that “the ancillary costs of retrieving, inspecting, and handling
24 material to be prepared for disclosure may not be charged to the requester.” *Fredericks v. Superior*
25 *Court* (2015) 233 Cal. App. 4th 209, 237, 182.

27. Govt. C. § 6253.1(a) requires that when CDSS receives a California Public Records Act request that it deems unfocused or does not reasonably describe identifiable records, California Department of Social Services is mandated to affirmatively assist the requestor by:

- (a) Assisting the member of the public to identify records and information that are responsive to the request or to the purpose of the request, if stated.
- (b) Describing the information technology and physical location in which the records exist.
- (c) Providing suggestions for overcoming any practical basis for denying access to the records or information sought.

28. The requirements of Govt. C. § 6253.1(a) are only satisfied if “the public agency is unable to identify the requested information after making a reasonable effort to elicit additional clarifying information from the requester that will help identify the records.” (Govt. C. § 6253.1(b).)

29. The California Public Records Act authorizes any member of the public who believes that public records are being improperly withheld to institute proceedings for a writ of mandate against a public agency to enforce its right to inspect or receive copies of any public record. (Govt. C. §§ 6258, 6259(a).)

30. If the court finds that certain public records are being improperly withheld from a member of the public, the court shall order the officer or person charged with withholding the records to disclose the public record or show cause why he or she should not do so. (Govt. C. § 6259(a).)

FACTUAL BACKGROUND

31. Between December 2015 and March 2017 Petitioner CCWRO requested documents concerning the policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services pursuant to Welf. Inst. & Code Section 300, *et. seq.* of the foster care program. The requests include, but are not limited to: publications, newsletters, reports pertaining to

1 Children & Family Services Division; writings pertaining to the Children & Family Services Division
2 from "County Welfare Directors Association (CWDA) workgroups meetings; CDSS publications,
3 newsletters and reports pertaining to Children & Family Services Division; inquiries received from
4 Children & Family Services Division from any agency of the federal government; documents that
5 CDSS provided to or received from Congress regarding Child Welfare Services programs; inquiries
6 received from Children & Family Services Division from any state agency; documents that CDSS
7 provided to or received from the California State Legislature; policy interpretation requests from any
8 county or persons re: Children & Family Services Division and its child welfare services programs;
9 policy interpretation requests sent to any person from any county or person regarding Children &
10 Family Services Division or Child Welfare Services; copies of corrective action plans received from
11 any county or anything similar to such a plan; most recent Children & Family Services Division
12 roster of official staff titles, assigned counties and state telephone numbers and copies of policy
13 interpretation log/list that tracks policy interpretations, including minutes of meetings to discuss
14 policy interpretations.

15
16
17
18 32. Throughout this period, Respondents has consistently ignored the requests without any
19 acknowledgement of CCWRO's California Public Records Act requests. They never produced the
20 documents and/or documented the justification for withholding the records. However, due to
21 California Department of Social Service's lack of response to all of CCWRO's California Public
22 Records Act requests, no other option exists but to file this petition.

23
24 33. Beginning December 30, 2015, Coalition of California Welfare Rights Organizations, Inc.
25 submitted California Public Records Act requests to California Department of Social Services to
26 receive copies of public records covering the time period December 1, 2015 through December 31,
27 2016. True and correct copies of the requests are attached to this Petition in the Appendix of Exhibits
28

1 as "Exhibit A." Respondents failed to determine whether the request sought disclosable public
2 records in its possession and notify Coalition of California Welfare Rights Organizations, Inc. within
3 10 days that disclosable public records existed as required by Government Code section 6253(c). At
4 no time has CDSS responded to any of the California Public Records Act requests contained in
5 Exhibit A, by producing public records or explicitly denying the requests and identifying the names
6 and titles or positions of each person responsible for the denial.
7

8 34. On August 1, 2016 a demand letter notified CDSS of the intent to use litigation to compel
9 compliance with all outstanding California Public Records Act requests if no response were received
10 from all outstanding requests. A true and correct copy of this demand letter is attached to this Petition
11 in the Appendix of Exhibits as "Exhibit B." Respondents did not respond to the August 1, 2016
12 demand letter.
13

14 35. Petitioner sent seven additional demand letter notices to CDSS dated October 3, 2016,
15 October 31, 2016 and November 1, 2016, December 2016, January 2017, February 2017 and March
16 2017. A true and correct copy of these demand letters are attached to this Petition in the Appendix of
17 Exhibits as "Exhibit C" respectively. At no time has CDSS responded to any of the California Public
18 Records Act requests contained in Exhibit C, by producing public records or explicitly denying the
19 requests and identifying the names and titles or positions of each person responsible for the denial.
20

21 36. Since 2015, CDSS has continuously failed to meet the requirements of the California
22 Public Records Act. Specifically, Respondents have violated and continue to violate: 1) Govt. Code
23 § 6253(b), by failing to determine whether the requests in whole or in part sought copies of
24 disclosable public records in the possession of the agency; 2) Govt. C. § 6253(c) by failing to
25 promptly notify the requester of the determination and the reasons therefor within ten days of the
26 request or after a fourteen-day extension; and 3) Govt. C. § 6253(d) by failing to notify Petitioners
27
28

1 the requests were denied and identifying the names and titles or position of each person responsible
2 for the denial of the requests. The cumulative violations of the California Public Records Act by
3 California Department of Social Services results in the deliberate obstruction of the inspection and
4 copying of public records and thus, a further violation of Govt. C. § 6253(d).

6 **FIRST CAUSE OF ACTION**

7 **Violation of Art. 1, § 3 of the California Constitution**

8 **Right of Access to Information Concerning the Conduct of the People's Business**

9 37. Petitioner re-alleges and incorporates herein by reference to each allegation contained in
10 the above paragraphs.

11 38. Respondents have a clear, present ministerial duty to comply with Art. 1, § 3 of the
12 California State Constitution and make the requested public documents available for copying and
13 inspection. The California State Constitution provides an independent right of access to public
14 records: "The people have the right of access to information concerning the conduct of people's
15 business, and, therefore, the meetings of public bodies and the writings of public officials and
16 agencies shall be open to public scrutiny." (Cal. Const., Art. 1, § 3(b)(1).)

17 39. Petitioner requested public records from Respondents that pertain to operation of the
18 child welfare services programs. Petitioner alleges on information and belief that Respondents
19 maintain the requested documents in their possession and that the requested public records are within
20 the custody and control of Respondents.

21 40. Petitioner alleges on information and belief that numerous public records exist that are
22 responsive to Petitioner's requests, but were never provided by Respondents.

23 41. Respondents have failed to comply with Art. 1, § 3 of the California State Constitution by
24 denying Petitioner access to the public records.
25
26
27
28

1 42. Petitioner is entitled to a writ of mandate under CCP § 1085 to require Respondents to
2 comply with Art. I, § 3 of the California State Constitution. Respondents' failure to make the
3 requested public documents available for copying and inspection violates Art. I, § 3 of the California
4 State Constitution. Specifically, Petitioner is entitled to a writ of mandate requiring California
5 Department of Social Services to provide all disclosable public records that have been requested.
6

7 43. Written demand was made upon the Respondents to perform their duties. In
8 contravention of the law and the demand made upon them, Respondents have failed and refused to
9 perform their duties under the California State Constitution.
10

11 44. Petitioner is beneficially interested in Respondents' performance of their duties.
12 Petitioner has no plain, speedy, and adequate remedy in the ordinary court of law. Unless the Court
13 grants the relief requested, Respondents will continue to fail and refuse to perform their legal duties,
14 to the immediate and ongoing harm of the Petitioner.

15 45. No money or other legal remedies can adequately compensate Petitioner for the hardship
16 caused by Respondents' failure and refusal to perform their legal duties.
17

18 **SECOND CAUSE OF ACTION**
19 **Violation of Govt. C. s 6253(b), (c), and (d)**
 California Public Records Act

20 46. Petitioner re-alleges and incorporates herein by reference each and every allegation
21 contained in the above paragraphs.

22 47. Between December 2015 and March 2017, Petitioner sent California Public Records Act
23 requests pertaining to the operation of the child welfare services programs to California Department
24 of Social Services. Petitioners allege on information and belief that Respondents maintain the
25 requested documents in their possession or that the requested public records are within the custody
26 and control of Respondents.
27
28

1 48. Respondents have a clear, present ministerial duty to comply with Govt. C. §§ 6253(b),
2 (c) and (d). Respondents were required to:

- 3 i. Promptly notify Petitioner of the determination of whether the requests in
4 whole or in part sought copies of disclosable public records in California
5 Department of Social Service's possession and the reasons therefor within
6 ten days of the request or within the fourteen-day extension period;
7 ii. Specify a date when a determination is expected to be dispatched when
8 requesting an extension; and
9 iii. Notify Petitioner the requests were denied and identify the names and titles
10 or position of each person responsible for the denial.

11 (Govt. Code §§ 6253(b), (c), (d).)

12 49. Petitioner alleges on information and belief that Respondents have had and continue to
13 have the ability to comply with Petitioners' requests. Petitioners are entitled to a writ of mandate
14 under CCP § 1085 to require Respondents to comply with Govt. C. §§ 6253(b), (c) and (d).
15 Specifically, Petitioners are entitled to a writ of mandate requiring California Department of Social
16 Services to provide all requested public records.

17 50. Written demand was made upon the Respondents to perform their duties on August 1,
18 2016, October 3, 2016, October 31, 2016 and November 11, 2016. In contravention of the law and
19 the demand made upon them, Respondents have failed and refused to perform their duties under the
20 California Public Records Act.

21 51. Petitioner is beneficially interested in Respondents' performance of their duties.
22 Petitioner have no plain, speedy and adequate remedy in the ordinary court of law. Unless the Court
23 grants the relief requested, Respondents will continue to fail and refuse to perform their legal duties,
24 to the immediate and ongoing harm of the Petitioner.
25

26 52. No money or other legal remedies can adequately compensate Petitioner for the hardship
27 caused by Respondents failure and refusal to perform their legal duties.
28

1 **PRAYER**

2 **WHEREFORE**, Petitioners pray that the Court grant the following relief:

- 3 1. Issue a Writ of Mandate pursuant to CCP § 1085 and Govt. C. § 6258 ordering
4 Respondents to perform as required by the California Public Records Act and to release all
5 disclosable records responsive to Petitioner's California Public Records Act requests;
6
7 2. Provide all disclosable public records at no charge to Petitioners;
8
9 3. For an award of costs incurred in this action;
10
11 4. For recovery of reasonable attorney's fees as allowed by law; and
12
13 5. For such other and further relief as the Court deems just and proper.

14 DATED: April 21, 2017

Respectfully submitted,

15 GRACE GALLIGHER
16 KISHWER VIKAAAS BARRICA

17 BY: _____
18 KISHWER VIKAAAS BARRICA
19 Attorney for Petitioner
20
21
22
23
24
25
26
27
28

INDEX OF EXHIBITS

Exhibit No.	Description	Pages
A	CA PRA requests to CDSS from Dec 2015, Feb 2016-Aug 2016	24
B	Aug 1, 2016 demand letter notice to CDSS	3
C	Demand letter notices to CDSS dated Oct 3, 2016, Oct 31, 2016 and Nov 1, 2016, Jan 2017, Feb 2017 and Mar 2017	18

VERIFICATION

I, Kevin Aslanian, declare as follows:

I am the Petitioner in the above-entitled matter. I have read the forgoing petition and know the contents therefore. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and, as to those matters, I believe it to be true.

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

Executed on April 21, 2017 in Sacramento, California.

Kevin Aslanian, Executive Director, CCWRO

EXHIBIT A

EXHIBIT A

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

December 30, 2015

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. **PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT"**. If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

This request is for the period of **December 1 through December 31, 2015**. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not **DEMAND** money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and

all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **“next steps” committee**.

3. A copy of any and all documents or other “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.
10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding

any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

February 1, 2016

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT". If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

This request is for the period of **January 1 through January 31, 2016**. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not DEMAND money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and

all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **“next steps” committee**.

3. A copy of any and all documents or other “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.
10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding

any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director
cc: Kim Kossick

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

March 7, 2016

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. **PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT"**. If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

This request is for the period of **February 1 through February 29, 2016**. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not **DEMAND** money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and

all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **"next steps" committee**.

3. A copy of any and all documents or other "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.
10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding

any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

April 4, 2016

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. **PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT"**. If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

This request is for the period of **March 1 through March 31, 2016**. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not **DEMAND** money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and

all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **"next steps" committee**.

3. A copy of any and all documents or other "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.
10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding

any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

May 3, 2016

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. **PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT"**. If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

This request is for the period of **April 1 through April 30, 2016**. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not **DEMAND** money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and

all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **"next steps" committee**.

3. A copy of any and all documents or other "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.
10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding

any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

June 6, 2016

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT". If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

This request is for the period of **May 1 through May 31, 2016**. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not DEMAND money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and

all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **“next steps” committee**.

3. A copy of any and all documents or other “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.
10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding

any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

July 5, 2016

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT". If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

This request is for the period of **June 1 through June 30, 2016**. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not DEMAND money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and

all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **"next steps" committee**.

3. A copy of any and all documents or other "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.
10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding

any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

August 1, 2016

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. **PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT"**. If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

This request is for the period of **July 1 through July 31, 2016**. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not **DEMAND** money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and

all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **"next steps" committee**.

3. A copy of any and all documents or other "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.
10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding

any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

EXHIBIT B

EXHIBIT B

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

August 1, 2016

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. **PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT"**. If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

DEMAND LETTER-NOTICE

-It has been a year since we received anything from your division. This is a 30-day notice to produce responses to all of our request or else we will be forced to file litigation. We have been super patient, but that also has its limits.

This request is for the period of **August 1 through August 31, 2016**. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not DEMAND money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **"next steps" committee**.
3. A copy of any and all documents or other "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.

10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

EXHIBIT C

EXHIBIT C

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

October 3, 2016

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. **PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT"**. If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

DEMAND LETTER-NOTICE

-It has been a year since we received anything from your division. This is a 30-day notice to produce responses to all of our request or else we will be forced to file litigation. We have been super patient, but that also has its limits.

This request is for the period of **September 1 through September 30, 2016**. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not DEMAND money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **"next steps" committee**.
3. A copy of any and all documents or other "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.

10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

October 31, 2016

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0816
Fax (916) 736-2845
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT". If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

DEMAND LETTER-NOTICE

-It has been a year since we received anything from your division. This is a 30-day notice to produce responses to all of our request or else we will be forced to file litigation. We have been super patient, but that also has its limits.

This request is for the period of **October 1 through October 31, 2016**. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not DEMAND money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **"next steps" committee**.
3. A copy of any and all documents or other "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.

10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

November 1, 2016

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT". If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

DEMAND LETTER-NOTICE

-It has been a year since we received anything from your division. This is a 30-day notice to produce responses to all of our request or else we will be forced to file litigation. We have been super patient, but that also has its limits.

This request is for the period of October 1 through October 31, 2016. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not DEMAND money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **"next steps" committee**.
3. A copy of any and all documents or other "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all "writings" pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.

10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

January 1, 2017

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT". If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

DEMAND LETTER-NOTICE
-It has been a year since we received anything from your division. This is a 30-day notice to produce responses to all of our request or else we will be forced to file litigation. We have been super patient, but that also has its limits.

This request is for the period of December 1 through December 31,. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not DEMAND money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **“next steps” committee**.
3. A copy of any and all documents or other “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.

10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

February 1, 2017

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

ATTN: Tracy Doan

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT". If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

DEMAND LETTER-NOTICE
-it has been a year since we received anything from your division. This is a 30-day notice to produce responses to all of our request or else we will be forced to file litigation. We have been super patient, but that also has its limits.

This request is for the period of January 1 through January 31,. Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not DEMAND money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **“next steps” committee**.
3. A copy of any and all documents or other “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.

10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick

**Coalition of California Welfare
Rights Organizations, Inc.**

CCWRO

March 6, 2017

Will Lightbourne, Director
CDSS
744 "P" Street, M.S. 8-17-11
Sacramento, CA 95814

Greg Rose, Deputy Director
Children & Family Services
Division
CDSS
744 "P" Street, M.S. 8-17-18
Sacramento, CA 95814

Kevin M. Aslanian
Executive Director
Grace A. Galligher
Directing Attorney
1901 Alhambra Blvd.
Sacramento,
CA 95816-7000
Tel. (916) 736-0616
Fax (916) 736-2645
Cell (916) 712-0071
ccwro.org

ATTN: Tracy Doan

Re: California Public Records Act Request for Documents

Dear Tracy:

Pursuant to the California Public Records Act, California Government Code § 6250 et seq., on behalf of our public assistance clients, CCWRO asks to review and then receive copies of the documents as described below. The copies of the documents may be produced either by electronic (e-mail) mail in PDF, Microsoft Word or Excel. PLEASE NOTE: WE ARE NOT ASKING FOR THE "ORIGINAL DOCUMENT". If the department has concluded that the document is not available electronically in its original format as required by Govt. Code §6253.9(a), please explain why not and provide us with an opportunity to review and examine the documents in response to this request so we can designate the documents that need to be reproduced.

DEMAND LETTER-NOTICE

-It has been a year since we received anything from your division. This is a 30-day notice to produce responses to all of our request or else we will be forced to file litigation. We have been super patient, but that also has its limits.

This request is for the period of February 1 through February 28, 2017.

Please provide a copy of any and all the following documents electronically by email, which we understand to be held by your office: (NOTE: If you do not have the item in electronic form, then I will inspect said document. After inspection, if I still wish to have a copy thereof, then, and only then, will pay the 20¢ a page fee. Please do not DEMAND money for documents that you have in electronic form and documents that I have not specifically inspected and requested a copy thereof.)

1. A copy of any and all of the CDSS publications, newsletters, reports pertaining to the Children & Family Services Division policies, procedures, program design, program operation, federal waivers relative to the Child Welfare Services programs pursuant to WI&C Section 300, et.seq and any "writings" pursuant to Gov. Code 6252(g) of any and all external meetings which are not available on the CDSS website.

2. A copy of any and all County Welfare Directors' Association (CWDA) agendas with attachments pertaining to the Children & Family Services Division, **meeting minutes**, including any inquiry about the child welfare services programs that CDSS provided to or received from the CWDA by any members of your staff during any and all CWDA meetings including, but not limited to the **children committee**, the **OPS committee** and the **“next steps” committee**.
3. A copy of any and all documents or other “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS provided to or received from any CWDA committees, CWDA workgroups, any task forces or any conference calls.
4. A copy of any and all document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, any inquiry including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the federal government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
5. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and/or external meetings, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from Congress regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
6. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from any agency of the State government regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
7. A copy of any and all any document and all “writings” pursuant to Gov. Code 6252(g) pertaining to the Children & Family Services Division policies and procedures, including, but not limited to e-mails, letters, and faxes that CDSS provided to or received from including the California State Legislature regarding Child Welfare Services programs pursuant to WI&C Section 300, et.seq.
8. A copy of any and all unaltered policy interpretations requests from any county, or any person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the child welfare services programs that CDSS received.
9. A copy of any and all unaltered policy interpretations requests transmitted to any person from any county, or any other person pertaining to the Children & Family Services Division policies, procedures, including any inquiry about the Child Welfare Services Programs that CDSS sent.

10. A copy of any and all any documents, including but not limited to corrective action notes, letters, corrective action plans, letters or emails, that CDSS sent to or received from any county pertaining to a Children & Family Services Division program review and/or monitoring conducted by the Children & Family Services Division regarding any and all child welfare services programs. This request includes follow-up monitoring activities.

11. Copies of any corrective action plans received from any county or any instruments of communications transmitted to any county through any means regarding any corrective action plan or anything that is similar to a corrective action plan but the division uses a different name for it.

12. A copy of any and all the most recent Children and Family Services division and each of the branches/bureaus/sections therein telephone roster containing the names, official titles and State telephone numbers that is regularly used by your staff, including county and program issue assignment list. Please note that this is not a request for personal telephone or cellular telephone numbers.

13. Copy of the Policy interpretation log/list or any other instrument of writing keeping track of policy interpretations and revealing their status, including minutes of meetings to discuss the policy interpretations and other matters by the section.

We ask CDSS for a determination on this request within ten days of receipt. If CDSS determines that any or all of the information requested above qualifies for an exemption from disclosure, CCWRO asks you to note whether the exception is discretionary and, if so, whether it is necessary to exercise your discretion to withhold that information.

If CDSS determines that some but not all of the information is exempt from disclosure and that the agency intends to withhold it, we ask that you redact it for the time being and make the rest available as requested.

If I can provide any clarification to expedite the request, please contact me at (916) 736-0616, or kevin.aslanian@ccwro.org. I ask that you notify me in advance of any duplication costs exceeding \$20.00.

Thank you very much for your time and attention.

Sincerely,



Kevin Aslanian, Executive Director

cc: Kim Kossick