

**ROB BONTA**  
**Attorney General**

**State of California**  
**DEPARTMENT OF JUSTICE**



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January 16, 2024

***Via E-mail only***

Joe Thomas  
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RE: Request No. 2024-00027

Dear Mr. Thomas:

This letter is in response to your correspondence dated January 3, 2024, which was received by the California Department of Justice (Department) on January 3, 2024, in which you requested records pursuant to the California Public Records Act (Gov. Code, § 7921.000 et seq.) (PRA).

Specifically, you requested:

*Copies of all correspondence, and any accompanying information, including also any attachments, a) sent to or from or copying (whether as cc: or bcc:) Sonia F. Ramos that b) includes anywhere, in any field or the body of an email/email 'thread', i) @sunflower-alliance.org, ii) @climateintegrity.org iii) @corporateaccountability.org, iv) @apen4ej.org, v) @cbecal.org, vi) @catf.us, vii) @biologicaldiversity.org, viii) @caleja.org and/or ix) @democracyforward.org, 2 and is c) dated from March 1, 2023 through December 31, 2023, inclusive.*

You further indicated:

*You may exclude all info@ addresses, e.g., info@climateintegrity.org, as non-responsive.*

The Department completed a search and identified records that are arguably responsive to your request because they contain references to "@biologicaldiversity.org." Those records, however, are exempt from disclosure because they are protected under the work product doctrine. The PRA incorporates confidentiality privileges set forth elsewhere in law, including

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the work product doctrine set out at Code of Civil Procedure section 2018.030. (Gov. Code § 7927.705; *Roberts v. City of Palmdale* (1993) 5 Cal.4th 363.) The work product doctrine, which protects against disclosure of an attorney’s “impressions, conclusions, opinions, or legal research or theories,” applies to internal memoranda, drafts, notes, and other records prepared in the course of litigation. (Code Civ. Proc., § 2018.030.) In this case, the records are internal records exchanged among Department attorneys and/or legal staff and pertain to litigation. Records consisting of work product will not be produced.

This completes the Department’s response to your request.

Sincerely,

*/s/ Heather M. Lewis*

HEATHER M. LEWIS  
Deputy Attorney General

For ROB BONTA  
Attorney General