

# Counsel Review Request (for Jackie to provide her attorney)

Case: City of Sacramento Code Enforcement — Case #23-009185 (4880 T St)

Date: January 23, 2026

## What Jackie needs from counsel

Jackie is asking for an independent legal reality-check on the documented issues below and in the attached handout. Chris has compiled specific discrepancies between the official case record / productions and the underlying evidence. If any of this is normal and lawful for Sacramento's process, please explain plainly why; if it is not, please identify what is actionable, what the City is required to do, and the cleanest next step.

## Attached

Exhibit A: "Documented Discrepancies + Unanswered Records Requests" handout (compiled by Chris).

Exhibit B (optional, if requested): supporting screenshots, email headers, portal messages, timestamps, camera clips, and PDF hash/metadata notes.

## Questions (please answer directly)

1. Are the issues in Exhibit A consistent with normal, lawful City practice? If yes, explain why each category is lawful and what authority/process supports it.
2. If any items are not normal/lawful, which ones matter legally (due process, notice requirements, record integrity, CPRA compliance), and why?
3. Does the City have to document an in-person meeting like the April 2023 meeting in the official case record? If not, what should exist elsewhere (visitor log, calendar, emails) and how do we obtain it?
4. Can the City rely on photos or evidence that exist internally but were not referenced/served/produced in the Notice & Order or the case production? What are the implications?
5. If a case note implies communication 'to Chris' but the produced emails show Chris was not a recipient, what is the legal significance (if any), and what is the best way to force verification/correction?
6. What is the cleanest next step now (e.g., targeted CPRA follow-ups, demand for correction, preservation letter/litigation hold, administrative appeal/petition), and what should Jackie avoid doing/saying in the meantime?

Requested format: a short written response that Jackie can understand (plain language), plus any citations to statutes/case law only where needed.

Note: This cover page is not a legal argument; it is a request for counsel to confirm whether Chris's documented concerns are incorrect, or if they reflect real procedural/records problems that warrant escalation.

# Case #23-009185 (4880 T St) — Documented Discrepancies + Unanswered Records Requests

Print/handout for City staff (Paul Lovato / Doug \_\_\_\_\_ / others)

Hand-delivered on: \_\_\_\_\_ Time: \_\_\_\_\_ Location: \_\_\_\_\_

## Summary (read this first)

This case file and the City's records responses show a repeat pattern that cannot be brushed off as "clerical" or "misunderstanding." A key in-person meeting with Paul and Doug is missing from the official case record entirely; the case notes include "observations" that conflict with objective camera evidence; a photo was shown by the City but is not produced; an official note describes an email reply "to Chris" that the produced emails do not support; and compliance demands have been treated as mandatory even when they are not stated in a served Notice & Order. On top of that, multiple CPRA requests have been closed or "answered" through substitutions (new PDFs, filtered exports, generic closure language) without item-by-item determinations of what exists, what was withheld (with statutory basis), and what was not found. The purpose of this handout is simple: identify the exact records that support the City's positions, and correct the record where the evidence does not.

## Part 1 — Case record discrepancies (content problems)

### 1) Missing April 2023 meeting from the official case record

Fact: I met in person with Inspector Paul Lovato and supervisor Doug in April 2023 at the City building (I signed in/out).

Discrepancy: This meeting is not documented anywhere in the case records produced to date (no case note entry, no reference, no related documents).

Request clarifying record: Confirm in writing whether that meeting occurred and, if so, identify where it is recorded (case note entry/date/time) and produce related records (visitor log, internal notes, calendar entries, emails).

### 2) "Drove by / observed work" notes vs objective evidence

Fact: Case notes contain language implying Paul "drove by / observed" conditions or work activity.

Discrepancy: My camera evidence indicates he did not come to the property on at least some of the dates implied by those notes (timestamps/clips available).

Request clarifying record: For each date an observation is claimed, identify the basis (inspection log entry, recorded visit, photo timestamp, bodycam, etc.). If no supporting record exists, correct the note in writing.

### 3) Photo shown by the City but not produced in the case records

Fact: I was shown a photo on a City laptop screen presented as related to this case.

Discrepancy: That photo does not appear in the case PDFs/productions I received.

Request clarifying record: Identify the photo by file name/ID, date/time metadata, where it is stored, and produce it. If it was relied upon for enforcement posture, confirm how/where it is referenced in the case file.

#### **4) Email/communication record mismatch (case note wording vs actual recipients)**

Fact: A case note dated 09/11/2025 states in substance that Paul “replied back to the email stating: Chris, Thank you...”

Discrepancy: The produced email chain around 09/02/2025 (~2:43 PM) shows I was not included as a recipient on the message being described.

Request clarifying record: Provide the full email headers and confirm the actual recipients. If I was not copied, correct the case note narrative in writing to match the actual routing.

#### **5) Case notes “completeness” problem (what exists vs what is being represented)**

Fact: In this single case (23-009185), Paul authored 21 “general note” entries spanning roughly 13 pages of the produced case PDF.

Issue: Any production that provides only a single note per case (or a case list-style entry) is not equivalent to “all notes.”

Request clarifying record: Confirm in writing that “all notes” means the full text of all note entries, not summaries and not one-per-case outputs.

#### **6) Portal-message handling inconsistency (tracking/acknowledgment failure)**

Fact: On 12/29/2025 I submitted two portal messages the same way.

Discrepancy: The later one was processed into Request #25-4711 with email notifications; the first received no acknowledgment, tracking number, or response.

Request clarifying record: Identify what happened to the first portal message (intake log entry, who received it, disposition, and why it was not tracked/answered).

#### **7) Scope creep (requirements treated as mandatory without formal written order)**

Fact: Additional items have been treated as required that were not clearly bounded by the served Notice & Order and were not formally added through a properly issued amended/supplemental order.

Request clarifying record: Provide the active served Notice & Order and any amended/supplemental orders. If an item is “required,” identify exactly where it appears in a served order.

### **Part 2 — Pattern in CPRA handling (non-response and substitution)**

This section summarizes repeated CPRA issues where I requested specific records or itemized answers, and the City either did not answer the items, substituted something else, or closed the request while the core asks remained unaddressed.

#### **A) One portal message ignored, one processed (same method)**

Request: Confirm whether the first message was missed/overlooked, or why it was ignored.

Result: No acknowledgment/substantive answer on the ignored message.

#### **B) Missing/failed photo attachments after ~page 74 (repeatedly raised)**

Request: Corrected export with intact photos OR native inspection image files OR explicit “not found”/systems searched OR specific exemption/authorization if withheld.

Result: A later regenerated PDF was provided, but without answering the underlying questions about native images, whether images were transformed/downsampled/substituted, or whether any photos are missing/not retained.

### **C) Itemized A/B/C disposition request not provided**

Request (per item): A) produced, B) withheld (cite statute + who authorized + file/page range), or C) not found (who searched, which systems, search terms, date range).

Result: General “records collected”/closure language instead of item-by-item dispositions.

### **D) 311 export appears filtered to exclude the initiating complaint the City references**

Request: Re-run the 311 report with correct date range or remove filter; direct search for complaint 230317-1609966 with notes/attachments; identify systems/custodians searched.

Result: Request closed without a clear itemized answer to the re-run/direct-search/system transparency request.

### **E) Verification of “I replied to Chris” entry (narrow technical verification)**

Request: Confirm whether email existed; date/time; sender; recipients; subject; message ID/server log or confirmation record is inaccurate.

Result: No technical verification response matching the request (as of the last update).

### **F) Two materially different PDFs for the same case record (regeneration without accountability)**

Request: Native photos + inventory + export logs + image transformation records + who authorized/why regeneration occurred.

Result: Regeneration was treated as the “answer,” while the accountability/considered-record questions remained open.

This handout is only a surface-level summary. I have substantially more documentation supporting these issues, including additional records requests, additional discrepancies across productions, and supporting video/photos/timestamps that directly contradict portions of the City’s narrative and the way this case has been handled. What is listed here is a fraction of the total problems surrounding Case #23-009185, and I will be supplementing this with further evidence as it is organized and as additional records are produced (or continue to be withheld).