

## First Supplement to Memorandum 2019-47

**California Public Records Act Clean-Up (Comments on  
Tentative Recommendation)**

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At the July meeting, the Commission encouraged the staff to make greater use of “consent” procedures to streamline consideration of purely technical and uncontroversial matters.<sup>1</sup> With that in mind, **the staff proposes to treat the following matters discussed in Memorandum 2019-47 as consent items:**

<u>Topic</u>	<u>Pages</u>
Support for, or No Position on, Specific Aspects of the Proposed Recodification	7-9
Mistakes That Are Easy to Fix	9-10
Consistency: “Year-End” vs. “Yearend”	10-11
Consistency: References to the Internet	12-13
Consistency: “Department of Motor Vehicles” vs. “DMV” in leadlines	13-14
Consistency: “Alphabetical List” vs. “Alphabetical Index”	14-15
Other Concerns About Specific Aspects of the Proposed Recodification: Comment to Proposed Section 7920.000	44
Other Concerns About Specific Aspects of the Proposed Recodification: Proposed Section 7920.005	45

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1. Minutes (July 2019), p. 2.

Any California Law Revision Commission document referred to in this memorandum can be obtained from the Commission. Recent materials can be downloaded from the Commission’s website ([www.clrc.ca.gov](http://www.clrc.ca.gov)). Other materials can be obtained by contacting the Commission’s staff, through the website or otherwise.

The Commission welcomes written comments at any time during its study process. Any comments received will be a part of the public record and may be considered at a public meeting. However, comments that are received less than five business days prior to a Commission meeting may be presented without staff analysis.

<u>Topic</u>	<u>Pages</u>
Other Concerns About Specific Aspects of the Proposed Recodification: Proposed Section 7920.545	46-47
Other Concerns About Specific Aspects of the Proposed Recodification: Proposed Section 7923.750	51
Other Concerns About Specific Aspects of the Proposed Recodification: Proposed Section 7926.410	51-52
Other Concerns About Specific Aspects of the Proposed Recodification: Comment to Proposed Section 7927.700	56-57
Other Concerns About Specific Aspects of the Proposed Recodification: Proposed Section 7929.420	59-60
New Legislation	60

When the staff presents Memorandum 2019-47 at the September meeting, we will start by asking whether any of these items should be removed from the consent list. **If a person has a concern or comment about a particular item listed above, that person should speak up and request that the item be removed from the consent list.**

The remaining items will be treated as consent items. **The Commission will vote on them collectively, deciding whether they should be handled as recommended in Memorandum 2019-47.**

After the Commission votes on the consent list, the staff will present the other issues in Memorandum 2019-47 for discussion. **Assuming the consent list stays as shown above, the issues presented for discussion will be:**

<u>Topic</u>	<u>Pages</u>
Overall Reaction to the Proposed Recodification	3-7
Consistency: "Record" vs. "Records"	11-12
Consistency: Other Consistency Issues	15
Organizational Issues and Related Matters: CNPA's Suggestion Regarding Proposed Section 7920.505 ("Former Section 6254 Provisions"), Recodification of Section 6254, and Convenient Cross-Referencing of CPRA Exemptions	15-17

<u>Topic</u>	<u>Pages</u>
Organizational Issues and Related Matters: CNPA’s Suggestion Regarding Recurring Cross-References to Recodifications of Sections 6254.7 and 6254.13	17-21
Organizational Issues and Related Matters: “Part 2. Disclosure and Exemptions Generally” and “Part 3. Procedures” (Proposed Sections 7921.000-7922.210; 7922.500-7922.725)	21-24
Organizational Issues and Related Matters: “Part 4. Enforcement” (Proposed Sections 7923.000-7923.510; Existing Sections 6258 and 6259)	24-28
Organizational Issues and Related Matters: “Article 1. Law Enforcement Records Generally” (Proposed Sections 7923.600-7923.625; Existing Section 6254(f))	28-42
Organizational Issues and Related Matters: Proposed Section 7924.305	42-44
Other Concerns About Specific Aspects of the Proposed Recodification: Proposed Section 7920.535	46
Other Concerns About Specific Aspects of the Proposed Recodification: Proposed Section 7923.110	47-48
Other Concerns About Specific Aspects of the Proposed Recodification: Proposed Sections 7923.120 and 7923.510	48-51
Other Concerns About Specific Aspects of the Proposed Recodification: “Chapter 7. Library Records” (Proposed Sections 7927.100 and 7927.105; Existing Sections 6254(j) and 6267)	52-55
Other Concerns About Specific Aspects of the Proposed Recodification: Leadline for Proposed Section 7927.605	55-56
Other Concerns About Specific Aspects of the Proposed Recodification: Proposed Section 7928.720	58-59

After the Commission discusses these issues, the staff will ask if anyone would like to discuss any other issues relating to the proposed recodification. **Interested persons should feel free to raise any point of concern to them.**

Public comment is crucial in the Commission's study process, helping the Commission to make good decisions about how to revise the law.

Respectfully submitted,

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