

EXHIBIT B

From: [Perry, Joseph](#)
To: [Yeager, Robert](#)
Subject: RE: how does this look
Date: Thursday, August 21, 2025 4:04:23 PM
Attachments: [image001.png](#)

Silly, Rachel called me and said Ana needed me to get a report done ASAP. I told her it was in M43 pending supervisor approval

From: Yeager, Robert <Robert.Yeager@countyofnapa.org>
Sent: Thursday, August 21, 2025 4:02 PM
To: Perry, Joseph [REDACTED]
Subject: Re: how does this look

I was told not to complete a report and to delete by Rachael via Ana's orders

Sent from my Verizon, Samsung Galaxy smartphone
Get [Outlook for Android](#)

From: Perry, Joseph [REDACTED]
Sent: Thursday, August 21, 2025 4:01:22 PM
To: Yeager, Robert <Robert.Yeager@countyofnapa.org>
Subject: RE: how does this look

Good from my point of view

From: Yeager, Robert <Robert.Yeager@countyofnapa.org>
Sent: Thursday, August 21, 2025 2:37 PM
To: Perry, Joseph [REDACTED]
Subject: how does this look

AWARENESS:

On July 25, 2025, I was working as an Investigator for the Napa County District Attorneys' Office. Assistant District Attorney Paul Gero forwarded me a public records request from Zachary Minor for documents, recordings, emails, and texts, relating to an interview conducted at the Napa County District Attorney's Office on September 28, 2022.

INVESTIGATION:

The interview on September 28, 2022, was between Zachary Minor and State of California Contractor's State Licensing Board (CSLB) Investigator Amanda Martinez.

Investigator Martinez contacted me to request the use of an interview room at the Napa County District Attorney's Office for a case (CSLB-HD2022-8619/ Sonoma County Court case SCR765374-1) she was investigating in Sonoma County. The Napa County District Attorney's Office did not have jurisdiction for the case Investigator Martinez was investigating.

I reserved the small conference room for September 28, 2022, and I was present during the interview. Investigator Martinez asked if I could audio record the interview and I utilized my digital recorder. At the conclusion of the interview, Investigator Martinez asked I could email her the audio recording. The size of the recording was too large and I utilized the web application Dropbox to send Investigator Martinez a web link to download the audio file. I confirmed with Investigator Martinez that she had received the audio recording of the interview. As this case was not in Napa County District Attorney's Office jurisdiction, I erased the audio file from my digital recorder.

I conducted a search of my computer on July 25, 2025, for the information listed in the public records request. I could not locate the audio file as it was previous deleted after getting confirmation from Investigator Martinez had downloaded it. I searched the Dropbox web application and the file was not located. I reviewed all audio recordings on my digital recorder and I did not locate the audio file of the interview.

Several other public records requests were received by the Napa County District Attorney's Office. I contacted District Attorney Investigator Joe Perry and asked him if he thought he could recover deleted audio files from my digital recorder. Investigator Perry was previously assigned to the Northern California Computer Crimes Task Force (N3CTF) for three years and one of his duties while there was conducting forensic downloads of computers, cellular telephones, and other devices. Investigator Perry stated he would request permission to use the specialized equipment at N3CTF to see if it was possible to download the deleted audio files.

On August 20, 2025, Investigator Perry advised me he was able to recover the deleted audio file from the digital recorder. Investigator Perry and I reviewed/listened to the audio files and we located the interview between Investigator Martinez and Zachary Minor. Investigator Perry provided me two compact disks containing the audio file and I provided the disks to Napa County Chief Deputy Counsel Jason Dooley in compliance with the public records request. I provided Investigator Martinez and Sonoma County District Attorney Katy Yount with the audio file as well.

Investigator Perry completed a report to document the audio file recovery and booked a

copy of the audio file into evidence.

CONCLUSIONS/DEDUCTIONS:

The requested audio file was recovered by Investigator Joe Perry after he conducted a forensic download of the digital recorder used to record the interview between Investigator Martinez and Zachary Minor.

DISPOSITION:

1. The audio recording was provided to Napa County Chief Deputy Counsel Jason Dooley, Investigator Martinez and Sonoma County District Attorney Katy Yount.
2. See Investigator Perry's report regarding the forensic download of the digital recorder and booking the recording into evidence.

Robert Yeager

Investigator

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