

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

From: [Gero, Paul](#)
To: [Yeager, Robert](#); [Baber, Ana](#)
Cc: [Cardin, Rachel](#); [Lipanovich, John](#)
Subject: RE: You have been added to County of Napa records request #25-522 from Zach Minor
Date: Tuesday, August 5, 2025 8:27:44 AM

Is there any record of the recording ever being on drop box? Or a record of you sending anything to CSLB on drop box? Or are you saying there is absolutely no trace of such transaction? Can you also send me a link to the drop box so I can find their retention policy?

I'm cc'ing everyone else. They aren't responding so assuming they have no additional information.

From: Yeager, Robert <Robert.Yeager@countyofnapa.org>
Sent: Monday, August 4, 2025 7:03 AM
To: Gero, Paul <[REDACTED]>; Baber, Ana <[REDACTED]>
Cc: Cardin, Rachel <[REDACTED]>; Lipanovich, John
[REDACTED]
Subject: RE: You have been added to County of Napa records request #25-522 from Zach Minor

I used Napa County District Attorney's Office Issued [REDACTED] Recorder, Serial number [REDACTED] to record the interview on behalf of the CSLB with Minor and his wife. My only participation was to record the interview and provide it to CSLB Investigator Amanda Martinez. Once the interview was completed, I uploaded the interview to Dropbox and sent a link to Investigator Martinez. I spoke to her on the telephone and confirmed she received the link/interview. Once I confirmed the recording was collected/retained by the CSLB, I deleted the recording from Dropbox and the recorder as the investigation into Minor did not involve crimes in Napa County. I have reviewed all of the recording on the recorder and reviewed Dropbox and I was unable to locate the recording in question.

From: Gero, Paul <[REDACTED]>
Sent: Friday, August 1, 2025 10:11 AM
To: Yeager, Robert <Robert.Yeager@countyofnapa.org>; Baber, Ana
[REDACTED]
Cc: Cardin, Rachel <[r](#)>; Lipanovich, John
<[REDACTED]>
Subject: FW: You have been added to County of Napa records request #25-522 from Zach Minor

Please see latest request and let me know if you have any of this information regarding your recorder and how you sent it to CSLB.

From: County of Napa Public Records <messages@nextrequest.com>
Sent: Tuesday, July 29, 2025 5:47 PM
To: Gero, Paul <[REDACTED]>

Subject: You have been added to County of Napa records request #25-522 from Zach Minor

[External Email - Use Caution]

-- Reply ABOVE THIS LINE to post an INTERNAL message that will be sent to staff. Attach a non-image file to have it
uploaded to the request as a staff-only document. --

County of Napa Public Records

You are the new point of contact for request #25-522.

Dear Records Officer,

Pursuant to the California Public Records Act (Government Code § 6250 et seq.), I respectfully request records related to the September 28, 2022 recorded interview between Amanda Martinez (CSLB Investigator) and Zachary Minor, which took place at the Napa County District Attorney's Office.

REQUESTED RECORDS

1. Recording Device Usage and Assignment

Please provide:

- Make, model, and serial number of any audio recording device (e.g., digital recorder, phone, tablet, or CSLB-issued equipment) used on September 28, 2022.
- Any equipment assignment logs showing the DAs office was issued such a device during 2022.
- Any records reflecting whether a physical recording device was used by Amanda Martinez or any other party to record the meeting.
- Any chain-of-custody records, device logs, or upload records showing where the file was stored, transmitted, or deleted.

2. Cloud-Based Uploads or Deletion Events

If the recording was uploaded to a cloud-based system:

- Name of the platform used (e.g., Box, [Evidence.com](https://www.evidence.com), internal DCA/Napa DA cloud).
- Retention schedule or deletion policy in effect as of September 2022.
- System metadata or logs showing:
 - Upload time/date
 - File name or reference ID
 - Access logs (who viewed/downloaded and when)
 - Deletion event (how/when/by whom)

3. Access or Use of Recording by Amanda Martinez / Robert Yeager

- Any emails, memos, or logs showing Amanda viewed, downloaded, transcribed, or quoted the recording.
- Any notes, transcripts, or summaries Amanda created from the recording, in whole or in part.
- Any draft versions of Amanda's final report (including Exhibit #8) that reflect material sourced from the recording.

4. Internal Communications and Explanations for Loss

- All communications between Amanda Martinez, Jessie Flores, Robert Yeager, Katy Yount, or other DAs, discussing:
 - The status, use, or loss of the Sept. 28, 2022 recording up until 7/29/2025
 - The term "self-deleted", and whether that refers to a cloud platform or physical deletion.
 - Whether Amanda ever informed anyone the recording was stored on a device rather than cloud-only.
 - Any attempt to preserve, locate, or retrieve the recording after Zachary Minor's request in 2022 or 2025.

ADDITIONAL NOTES

If any record is withheld, please provide the specific exemption and legal justification as required under Gov. Code § 6255. I also request that records be provided in electronic format (.pdf, .eml, .mp4, etc.) where possible.

If clarification is needed or the scope needs to be narrowed, I am happy to confer in good faith to ensure a reasonable search. This request is made in the public interest and pertains to due process concerns in a criminal investigation, so I request a fee waiver as permitted under law.

Thank you for your timely attention to this request. I look forward to your response within the statutory period.

Sincerely,

Zachary Minor

zachminor11@gmail.com

[View Request 25-522](#)

<https://countyofnapa.nextrequest.com/requests/25-522>



[Help Pages](#) | nextrequest@civicplus.help