

**CALIFORNIA DEPARTMENT OF JUSTICE**  
**TITLE 11. LAW**  
**DIVISION 1. ATTORNEY GENERAL**  
**CHAPTER 19. RACIAL AND IDENTITY PROFILING ACT OF 2015**

**FINAL STATEMENT OF REASONS**

**UPDATE OF INITIAL STATEMENT OF REASONS**

On May 11, 2023, the Department of Justice (Department) issued additional proposed modifications to the rulemaking. The reasons and necessity for each are explained below.

Article 3. Data Elements To Be Reported

Section 999.226, subd. (a)(14)(A)1.c: In response to comments, the Department modified the example in the data element “Reason for Stop” for non-moving traffic violations. The Department deleted originally proposed language in the example and replaced it with “unrelated to vehicle maintenance or operation and aimed at regulating other traffic laws.” This was necessary to distinguish between moving, equipment, and non-moving violations. A non-moving violation is neither a moving violation nor an equipment violation. Providing this example helps the law enforcement officers understand what data elements to select.

Section 999.226, subd. (a)(15)(A)22.C.1: In the example, the Department deleted the phrase “surrounding bystanders,” and replaced it with “the missing child.” This was necessary to make clear how the Officer would report the “Reason for Stop” data element when they did not tell the person the reason for the stop when they are doing so for expediency in order to protect the child and save the child from harm and risk.

On July 14, 2023, the Department issued additional proposed modifications to the rulemaking. The reasons and necessity for each are explained below.

Article 1. Definitions

Section 999.244: The Department deleted section 999.224 from inclusion in the proposed text because no changes were made to that section in this rulemaking.

Article 3. Data Elements To Be Reported

Section 999.226, subd. (a)(15)(A): Making “data values” plural to add clarity and conform to the first sentence which instructs the Officer to select all of the “following data values.” In the absence of the plural use of “data values” an Officer might have been confused and only selected a single data value that best described the reason.

Section 999.226, subd. (a)(15)(A)20 and 21.: The Department added these two values to the data element when the reason and stop is made in the context of a K-12 setting. The additions of these

two values mirrors the values available under the “Reason for Stop” data element. This change was necessary not only to clarify how an Officer can report this data element, but also to conform the regulation to the existing data collection systems, which already had these values built-in and available to select, even in the absence of the regulatory language.

## **CORRECTIONS AND NON-SUBSTANTIAL EDITS**

A “non-substantial change” is one that clarifies “without materially altering the requirements, rights, responsibilities, conditions or prescriptions contained in the original text.” (Cal. Code Regs., tit. 1, § 40.) The following minor additional issues were noted since publication of the Notice of Proposed Rulemaking and Initial Statement of Reasons:

- Section 999.226, subd. (a)(4)(A)4.: Conforming the punctuation and “or” to the approved version of the Code of Regulations, and indicating the addition of the semi-colon for grammar purposes.
- Section 999.226, subd. (a)(5)(A)7.a.: Including the phrase Latine(x) as it is in the current approved version of the Code of Regulations.
- Section 999.226, subd. (a)(15)(A): Underlining the (A) to make clear it was newly proposed.
- Section 999.226, subd. (a)(15)(A)7, 14-20.: Deleting periods for consistency.
- Section 999.226, subd. (a)(15)(A)20-22.: Renumbering owing to additions of data values, adding paragraph levels for clarity, and deleting a period to be consistent.
- Section 999.227, subd. (a)(11): Including the correct paragraph number as it is in the current approved version of the Code of Regulations that is being updated owing to renumbering.
- Section 999.227, subd. (e)(4)(F): Conforming the cross-reference format by replacing “(1)” with “1.”
- Section 999.228, subd. (h): Indicating space deletion and addition.

## **SUMMARY OF COMMENTS AND DEPARTMENT RESPONSES**

On March 10, 2023, the Notice of Proposed Rulemaking was published in the California Regulatory Notice Register, sent to interested parties, and posted on the Department’s website, available at <https://oag.ca.gov/ab953/regulations>. The Department received seven comment letters during the initial 45-day public comment period, and an additional letter outside the initial 45-day comment period.<sup>1</sup> At the public hearing held on April 27, 2023, the Department heard comments from three individuals. A summary of each public comment received during this period and the Department’s responses are attached as Attachment A. A list of all of the commentators is attached as Attachment B.

The Department then revised the proposed modifications to the regulations and added documents relied on to the rulemaking file. The Proposed Text of Modified Regulations was revised on May

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<sup>1</sup> Government Code section 11346.4, subdivision (a) requires at least 45 days for the public to comment on the adoption, amendment, or repeal of any regulation.

11, 2023, resulting in an additional 15-day public comment period that concluded on May 26, 2023. The Department received no comment letters during this comment period.

The Department revised the proposed modifications to the regulations for a second time on July 14, 2023, resulting in an additional 15-day public comment period that concluded on July 31, 2023. The Department received 41 comment letters during this comment period, and four comments after the comment period ended. A summary of each public comment received during this period and the Department's responses is included in Attachment A. A list of the commentators is included in Attachment B.

### **LOCAL MANDATE DETERMINATION**

The Department has determined that the proposed revisions to the existing regulations impose a reimbursable mandate on local government. City and county law enforcement agencies subject to the reporting requirements of Government Code section 12525.5 must provide officers with the means to collect the additional data elements and data values set forth in these proposed revised regulations (in addition to the requirements set forth in Government Code section 12525.5 itself). They must also obtain the necessary personnel and/or technology to report the required stop data to the Department. These provisions may require additional investments in technology and/or personnel time, as detailed in the STD 399 and STD 399 Attachment A.

### **ALTERNATIVES DETERMINATION**

In accordance with Government Code section 111346.9, subdivision (a)(4), the Department has determined that no alternative it considered, or that it otherwise identified, or was brought to its attention, would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.

This determination is based on the fact that the bulk of the amendments are required to meet the statutory revisions to Government Code section 12525.5, and the objectives of California's Racial and Identity Profiling Act of 2015 (RIPA). Further, the Attorney General is required under RIPA to promulgate regulations that "specify all data to be reported, and provide standards, definitions, and technical specifications to ensure uniform reporting practices across all reporting agencies." (Gov. Code, § 12525.5, subd. (e).) For this additional reason, the Department determined that no alternative existed. The benefits of the amendments are that they build off of the benefits of the existing regulations by improving the quality of data that LEAs, the Board, advocates, academics and other members of the community can analyze. Improving the quality of the stop data can better reveal whether racial or identity profiling exists. This data is essential to understanding whether there are biases (either implicit or explicit) in law enforcement activities and collecting the data is an important first step in addressing these biases if they exist. If disparities are apparent, LEAs, the Board, and researchers can evaluate why those disparities are occurring—whether they are attributed to a systemic problem or a small percentage of officers—what, if any part of those disparities can be explained by legitimate policing activities, and what can and should be done to address the disparities observed. Indeed, high-quality stop data is not only invaluable to researchers and the public, but will also provide

critical guidance to LEAs, particularly with respect to officer training, if the data suggests patterns of discriminatory treatment or biases.

### **ALTERNATIVES THAT WOULD LESSEN ADVERSE ECONOMIC IMPACT ON SMALL BUSINESSES**

The Department determines that the proposed regulations do not adversely affect small businesses as the reporting requirements apply to law enforcement agencies.

### **NON-DUPLICATION**

The proposed revised regulations, sections 999.226 and 999.228, in some instances, duplicate state statutes which are cited as “authority” or “reference” for the proposed regulation. This duplication is necessary to satisfy the “clarity” standard of Government Code section 11349.1, subdivision (a)(3).

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Comments Received During 45-Day Comment Period and Second 15-Day Comment Period <sup>1</sup> and DOJ Responses			
Section/Topic	Commenter (Batestamp/Page Number(s) – Comment Number)	Comment (summarized or quoted)	CA DOJ Response
§ 999.226(a)(5) (Perceived Race or Ethnicity of Person Stopped)	Kern County Law Enforcement Association (008-2); Federated University Police Officers Association (010-2); Sonoma County Deputy Sheriffs' Association (012-2); Peace Officers Research Association of California (014-	Commenters oppose the provisions in the regulations that seek perceptions of a person's race and further recommend an amendment that would permit officers to indicate whether they formed their perception of the stopped person's race prior to initiating the stop or whether they were formed after initiating the stop.	No change has been made in response to these comments on this existing data element. The provisions related to perception data are not currently within the scope of the current rulemaking.  Further, the specific concerns raised by the Commenters appear more properly directed to the Legislature's determination that the perceived, rather than actual, race or identities of stopped persons shall be reported. <i>See</i> Gov. Code § 12525.5, subd. (b)(6).) That is, the regulations are consistent with the statutory language of the RIPA, which does not require that the stop data entries capture whether the officer's perception of a person's identity or race is formed prior to initiating a stop or taking any other action related to the stopped person. Govt. Code § 12525.5, subd. (b)(6) (requiring the reporting of the "perceived race or ethnicity, gender, and approximate age of the person stopped, provided that the identification of these

<sup>1</sup> No comments were received during the first 15-day comment period held from May 11, 2023 to May 26, 2023.

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	<p>2); Brian Marvel (April 27, 2023 Public Hearing transcript at 10:9-11:14); California Statewide Law Enforcement Association (18-2)<sup>2</sup></p>		<p>characteristics shall be based on the observation and perception of the peace officer making the stop, and the information shall not be requested from the person stopped.”; <i>see also id.</i> § 12525.5, subd. (e) requiring the Attorney General to issue regulations specifying all data to be reported).</p> <p>Finally, capturing officers’ perception of a person’s race or identity, as opposed to the actual race or identity, can reveal patterns to illuminate whether racial or identity profiling has or has not occurred</p>
<p>§ 999.226(a)(14): Reason for Stop</p>	<p>State of California Racial and Identity Profiling Advisory Board (002-2)</p>	<p>“...the Board observes that the distinction between 'Equipment violation' and 'Moving violation' is not clear from the proposed definitions of those secondary data values for 'Traffic Violation' under the data element 'Reason for Stop.' The Board proposes (1) combining 'Equipment violation' and 'Moving violation' into one secondary data value and (b) creating another secondary data value of 'Violations not involving Vehicles (e.g., pedestrians,</p>	<p>In response to this comment, the Department revised the example for non-moving violation, which could have been interpreted as an equipment violation. These violations also require the applicable code section from the Offense Table, which will also give context for the reason for the stop and violation.</p> <p>With respect to the suggested change to the secondary data values, the Department has determined, in drafting these amendments, that there would be a large technological burden to revise the stop data collection systems by January 1, 2024 to include this change. In coming to this conclusion, the Department balanced the statutory mandate of collecting Assembly Bill 2773’s new category of information that officers must report the reason for a stop that was communicated to the stopped person starting on January 1, 2024 with the desire clarify the categories of the three types vehicle</p>

<sup>2</sup> This letter was sent after the comment period ended and thus does not require a response because it is untimely. However, the Department has addressed the comments within the letter.

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		<p>bicyclists, or vulnerable road users).' The Board proposes (1) combining 'Equipment violation' and 'Moving violation' into one secondary data value and (b) creating another secondary data value of 'Violations not involving Vehicles (e.g., pedestrians, bicyclists, or vulnerable road users).'"</p>	<p>violations collected. The Department has determined that adding these additional data values for this data element was not necessary to include at this time given the substantial amount of time it would take to implement that change coupled with the need to amend the regulations to meet the statutory requirements to collect the “reason given” data on January 1, 2024.</p>
<p>§ 999.226(a)(new)(15): Reason Given to the Stopped Person</p>	<p>State of California Racial and Identity Profiling Advisory Board (002-1)</p>	<p>"for the new data element of 'Reason Given to the Stopped Person,' the Board recommends adding a data value of 'Same as the primary reason reported under Reason for Stop' to account for scenarios where an officer’s primary reason for the stop (as reported in the Reason for Stop data element) is the same as the reason communicated to the stopped person. The Board discussed that doing so</p>	<p>No change has been made in response to this comment. The Department has determined that, on balance, the time saved by including this data value is outweighed by the benefit of ensuring that officers are accurately reporting the reason communicated to the stopped person, as opposed to defaulting to a “same as” data value. The Department has thus determined that including this additional data value for this proposing data element was not necessary to include at this time.</p>

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		would save officer time and avoid duplication."	
	Policing Project of New York University School of Law (015-16-01)	The Commenter expressed support for this existing data element.	No change has been made in response to this comment, which is interpreted to be an observation rather than a recommendation of any change to the regulations.
§ 999.226(a)( <i>new</i> )(22): Race or Ethnicity of Officer (formerly § 999.226(a)(21))	William Bullington (001-2); Kent Ong (April 27, 2023 Public Hearing transcript at 7:21-8:10); Amanda Lashbrook (021-01)	Commenters opposed this data element, raising concerns about the disclosure of officers' identities.	No change has been made in response to this comment on this data element, which was already approved by the Office of Administrative Law in August 2022, will go into effect on January 1, 2024, and is not currently within the scope of the current rulemaking.  As explained on page 21 of the Initial Statement of Reasons issued on July 9, 2021 for the 2021-2022 round of rulemaking, the Department determined that this data element was necessary because it would enable the Board to serve its function of producing detailed findings on the past and current status of racial and identity profiling. This determination is informed by research that has observed links between the race and gender of an officer and the frequency of, outcome of, and actions taken during stops.
§ 999.226(a)( <i>new</i> )(23): Gender of Officer (formerly § 999.226(a)(22))	William Bullington (001-2); Kent Ong (April 27, 2023 Public	Commenters opposed this data element, raising concerns about the disclosure of officers' identities.	No change has been made in response to this comment on this data element, which was already approved by the Office of Administrative Law in August 2022, will go into effect on January 1, 2024, and is not currently within the scope of the current rulemaking.

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	<p>Hearing transcript at 7:21-10); John English (April 27, 2023 Public Hearing transcript at 14:15-15:5); Amanda Lashbrook (021-01)</p>		<p>As explained on page 21 of the Initial Statement of Reasons issued on July 9, 2021 for the 2021-2022 round of rulemaking, the Department determined that this data element was necessary because it would enable the Board to serve its function of producing detailed findings on the past and current status of racial and identity profiling. This determination is informed by research that has observed links between the race and gender of an officer and the frequency of, outcome of, and actions taken during stops.</p> <p>In response to a concern a commenter raised about asking an officer’s gender, which the commenter says is “not even something that agencies can necessarily ask during the hiring process,” the Department notes that it is unaware of a specific federal or state law that prohibits the collection of race or ethnicity of an officer for purposes of stop data or other types of data collection. Indeed, the Legislature, through Government Code section 12525.5, subdivision (e), specifically authorized the Attorney General to issue regulations on the Racial and Identity Profiling Act and gave the Attorney General discretion through the regulations to “specify all data to be reported.” Thus, the Attorney General is authorized under the law to require officers to provide their race and gender with their stop data entries. Similarly, the Legislature has required employers to provide demographic information to the state in other contexts. As one example, Government Code section 12999 requires private employers of 100 or more employees to report to Department of Fair Employment and Housing pay</p>
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			and hours-worked data by job category and by sex, race, and ethnicity. (Gov. Code, § 12999(a)-(b).) In addition, the Department of Fair Employment and Housing has recently released a report demonstrating the value of such data collection. (See, <a href="https://calcivilrights.ca.gov/wp-content/uploads/sites/32/2022/03/DFEH-Pay-Data-Results-Press-Release-2022-03-15-1.pdf">https://calcivilrights.ca.gov/wp-content/uploads/sites/32/2022/03/DFEH-Pay-Data-Results-Press-Release-2022-03-15-1.pdf</a> .) As such, there is precedent and support for this type of data collection under state law.
General Comments	William Bullington (001-1)	“[T]he length and breadth of the questions asked of the officers is borderline ridiculous. The longer and more invasive the questions are of the officers, the less likely they will be filling out a RIPA report after every contact, so your statistics will be skewed.”	No change has been made in response to this comment which is interpreted as general opposition to the statute and the proposed rulemaking, not as a recommendation to make any changes to the proposed modifications. The Department is going to amend the regulations for the reasons explained in the initial and final statement of reasons.
	Kern County Law Enforcement Association (007-1); Federated University Police Officers Association (009-1); Sonoma County	The Commenters expressed support for “the adoption of these amendments offered by the California Department of Justice (Department) as being necessary to align the Racial and Identity Profiling Advisory (RIPA) Board’s data collection process with current	No change has been made in response to this comment which is interpreted as general support for the proposed rulemaking, not as a recommendation to make any changes to the proposed modifications. The Department is going to amend the regulations for the reasons explained in the initial and final statement of reasons.

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	<p>Deputy Sheriffs' Association (011-1); Peace Officers Research Association of California (013-1); Brian Marvel (April 27, 2023 Public Hearing transcript at 9:19-10:8); California Statewide Law Enforcement Association (17-1)<sup>3</sup></p>	<p>California law. It is vitally important that the Board's process and role in assessing the state of racial profiling in the course of basic traffic enforcement map to current California law as stated by the Racial and Identity Profiling Act of 2015 (AB 953). In furtherance of that effort, there exists an additional opportunity to amend the data collection and analysis processes to further comply with AB 953."</p>	
	<p>Philip Romero (004-1)</p>	<p>"...I am appalled that the Legislators/DOJ would even consider amending this already discriminatory bill. My indigenous relatives fought against the government's discriminatory practices that undermines our constitutional principles,</p>	<p>No change has been made in response to this comment which is interpreted as general opposition to the statute and proposed rulemaking, not as a recommendation to make any changes to the proposed modifications. The Department is going to amend the regulations for the reasons explained in the initial and final statement of reasons.</p>

<sup>3</sup> This letter was sent after the comment period ended and thus does not require a response because it is untimely. However, the Department has addressed the comments within the letter.

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		<p>now the State wants to impose similar inequitable actions to my law enforcement team. This type of legislature makes me believe this bill is a government sanctioned discrimination process. This ‘Stop Data Collection’ has no standing in the operation and duties of law enforcement and to possibly require officers to select personal identifiers which does not pertain to their job duties, is an insult to the profession. It undermines the very Constitution that we as Peace Officers swore to uphold and protect. This defeats the purpose of the law enforcement Mission to protect these rights without discrimination.”</p>	
	<p>Philip Romero (004-2)</p>	<p>“The deconstruct of the basic meanings of identifiers i.e., ‘Cisgender man, Cisgender female, Nonbinary person...’ is bias at its core. What if the Officer does not identify</p>	<p>No change has been made in response to this comment which is interpreted as an observation, not as a recommendation to make any changes to the proposed rulemaking.</p> <p>To the extent the commenter objects to the requirement that officers provide their perception of the stopped</p>

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		<p>with these limited categories? Is that not discrimination? What does this category pertain to regarding law enforcement? This is discriminatory in nature by reducing people in ways they do not want to be reduced.”</p>	<p>person’s gender, perception data is not currently within the scope of the current rulemaking. Additionally, Government Code section 12525.5, subd.(b) requires officers to report the “perceived race or ethnicity, gender, and approximate age of the person stopped, provided that the identification of these characteristics shall be based on the observation and perception of the peace officer making the stop, and the information shall not be requested from the person stopped.”). Therefore, the comment is directed to issues with Racial and Identity Profiling Act—the governing statutory authority—and not these regulations.</p>
	<p>Philip Romero (004-3)</p>	<p>“The race category has no bearing on the actions of the officer and at the very least is limited to the options available. It contradicts the very meaning of racial profiling. All law enforcement officers are taught not to discriminate (Title VI, 18 U.S.C. § 242, Equal Protection Clause of the 14th Amendment), this bill encourages racial profiling.”</p>	<p>No change has been made in response to this comment which is interpreted as an observation, not as a recommendation to make any changes to the proposed rulemaking.</p> <p>To the extent the commenter objects to the requirement that officers provide their perception of the stopped person’s race or ethnicity, perception data is not currently within the scope of the current rulemaking. Additionally, Government Code section 12525.5, subd. (b) requires officers to report the “perceived race or ethnicity, gender, and approximate age of the person stopped, provided that the identification of these characteristics shall be based on the observation and perception of the peace officer making the stop, and the information shall not be requested from the person stopped.”). Therefore, the comment is directed to issues with Racial and Identity Profiling Act—the governing statutory authority—and not these regulations.</p>

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			<p>The Department further notes that Government Code section 12525.5 does not require officers to engage in any conduct that would constitute racial profiling. Pen. Code § 13519.4(e) (“‘Racial or identity profiling.’ for purposes of this section, is the consideration of, or reliance on, to any degree, actual or perceived race, color, ethnicity, national origin, age, religion, gender identity or expression, sexual orientation, or mental or physical disability in deciding which persons to subject to a stop or in deciding upon the scope or substance of law enforcement activities following a stop, except that an officer may consider or rely on characteristics listed in a specific suspect description. . . .”)</p>
	Philip Romero (004-4)	<p>“The Sexual Orientation categories are the very definition of ‘invasion of privacy.’”</p>	<p>No change has been made in response to this comment which is interpreted as an observation, not as a recommendation to make any changes to the proposed rulemaking.</p> <p>To the extent the commenter is concerned about officers asking stopped individuals about their sexual orientation, the Racial and Identity Profiling Act is clear that officers only provide their perceptions of the race or ethnicity, gender, and approximate age of the person stopped and that they must not request that information from the stopped person. (Gov. Code, § 12525.5, subd. (b)(6).) The additional data elements that require officers to provide their perceptions of other components of the stopped person’s identity are consistent with this statutory requirement, prohibiting officers from asking for this information.</p>
	Philip Romero (004-5)	<p>“The ‘perception’ of such categories has no relevance</p>	<p>No change has been made in response to this comment which is interpreted as an observation, not as a</p>

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		<p>in the performance of the duties of law enforcement. Again, relating a 'perception' to the performance of our duty is not necessary and is detrimental. The presumption of these questions or data entries seems to place the officer in forming a 'Biased' mentality. Forcing officers to enter 'perceptions' blatantly encourages biased based law enforcement"</p>	<p>recommendation to make any changes to the proposed rulemaking. Perception data is not currently within the scope of the current rulemaking. Moreover, the statutory language of the Racial and Identity Profiling Act specifically requires officers to provide their perception of a stopped person's identity. Govt. Code § 12525.5, subd. (b)(6) (requiring the reporting of the "perceived race or ethnicity, gender, and approximate age of the person stopped, provided that the identification of these characteristics shall be based on the observation and perception of the peace officer making the stop, and the information shall not be requested from the person stopped."); see also id. § 12525.5, subd. (e) (requiring the Attorney General to issue regulations specifying all data to be reported).</p>
	<p>Philip Romero (004-6)</p>	<p>"I could understand if it was for analytic purposes, however, the requirement to submit personal identifiers of people and of officers is simply unnecessary. I am respectfully submitting my opposition to any amendments to AB 953 and will submit my concerns to my U.S. Representative, State Senator and State Assemblymember voicing</p>	<p>No change has been made in response to this comment which is interpreted as general objection to the statute, not as a recommendation to make any changes to the proposed rulemaking. The Department is going to amend the regulations for the reasons explained in the initial and final statement of reasons.</p>

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		my disagreement to this entire bill.”	
	Policing Project of New York University School of Law (016-2)	“[W]e urge the California DOJ and the California legislature to continue to take measures to reduce pretextual traffic stops. By reducing officer discretion in stops and focusing on more serious, evidence-based stops that actually further traffic safety, California has the potential to reduce disparities while improving public safety.”	No change has been made in response to this comment which is interpreted as general support for the statute, not as a recommendation to make any changes to the proposed rulemaking. The Department is going to amend the regulations for the reasons explained in the initial and final statement of reasons
	Hakim Wilson (019-01-20-02); Alexa Blatz (022-01); Donna Coste (023-01); Andrew Nguyen (024-025-01); D’ette Nogle (052-01); Michael Everhart (026-01); Mark Roeder (027-01); Amanda Jason (028-01); Rachel Angel	Commenters express support for the Racial and Identity Profiling Act and wanted to suggest that the Section: “Discriminatory Emergency Calls” from AB 1550 be implemented in AB 953, because it would help fight racial profiling by having consequences for those that make false reports, and/or requests for peace officers/law enforcement based upon the caller’s own discriminative view.	With respect to comments in support of the Racial Identity Profiling Act, no change has been made in response to this comment which is interpreted as an observation, not as a recommendation to make any changes to the regulations.  With respect to comments recommending an amendment to Racial and Identity Profiling Act, no change has been made in response to these comments. This recommendation goes outside the scope and purpose of the regulations. Govt. Code § 12525.5, subd. (e) (Specifically authorizing the Attorney General to issue regulations on the collection and reporting of data.) Moreover, because these comments relate to issues with Racial and Identity Profiling Act, the governing statutory authority, and not these regulations, (see Gov. Code, § 12525.5, subd. (d)), the

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	<p>(029-01); Kim Koury (030-01); Scott Burgin (031-01); Vanessa Joyce (032-01); Tatia Muir (033-01); Nicole Frangione (034-01); Hannah Lee (035-01); Paulette Dallas (036-01); Paige Graff (037-01); Thyren Castillo (038-01); Libby Everhart (039-01); Joann Libolt (040-01); Saulius Jarasunas (042-01);<sup>4</sup> Harold Huttas (043-01); Melissa Harris (044-01); Roy Pachinsky (045-01); Mychael</p>		<p>specific concerns raised by the comments appear more properly directed to the Legislature.</p>
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<sup>4</sup> This letter was sent after the comment period ended and thus does not require a response because it is untimely. However, the Department has addressed the comments within the letter.

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	<p>Johnson (046-01);          Unidentified Commenter (047-01);          Kristina Slade (048-01);          Rochelle Travers (049-01); Lydia Prescott (050-01); Dorit Hanover (051-01); D'ette Nogle (052-01); Tiffany R. Koury (053-01); Jennifer Whitley (054-01); Jim Shannahan (055-01); Danielle Hoover (056-01); Nareg Burr (057-01); Marta Villalobos (059-01); Hashi Clark (060-01);          William</p>		
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	Cluverius (061-01-02); Nina Kammer (062-01); Kat Friis (063-01) <sup>5</sup> ; Jill Lundin (064-01); <sup>6</sup> Larry Olson (065-01) <sup>7</sup>		
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<sup>5</sup> This letter was sent after the comment period ended and thus does not require a response because it is untimely. However, the Department has addressed the comments within the letter.

<sup>6</sup> This letter was sent after the comment period ended and thus does not require a response because it is untimely. However, the Department has addressed the comments within the letter.

<sup>7</sup> This letter was sent after the comment period ended and thus does not require a response because it is untimely. However, the Department has addressed the comments within the letter.

**NAMES OF INDIVIDUALS WHO MADE PUBLIC COMMENTS RECEIVED DURING  
FIRST COMMENT PERIOD (March 10, 2023 to April 25, 2023)**

1. William Bullington, Chief of Police Lake Shastina Police Department (001)
2. Federated University Police Officers' Association (009-010)
3. Kern Law Enforcement Association (007-008)
4. John English, Chula Vista Police Department (April 27, 2023 Public Hearing transcript)
5. Brian Marvel, President of the Peace Officers Research Association of California (April 27, 2023 Public Hearing transcript)
6. Kent Ong, Clairmont Police Department (April 27, 2023 Public Hearing transcript)
7. Peace Officers Research Association of California (013-014)
8. Phillip Romero, Operations Lieutenant, Irvine Valley College Police Department (004)
9. Sonoma County Deputy Sheriffs' Association (011-012)
10. State of California Racial and Identity Profiling Advisory Board (002-003)
11. Policing Project, New York University School of Law (015-016)
12. California Statewide Law Enforcement Association (017-018)

**NAMES OF INDIVIDUALS WHO MADE PUBLIC COMMENTS RECEIVED DURING  
SECOND 15-DAY COMMENT PERIOD (July 14, 2023 to July 31, 2023)**

1. Hakim Wilson (019-020)
2. Amanda Lashbrook (021)
3. Alexa Blatz (022)
4. Donna Coste (023)
5. Andrew Nguyen (024-025)
6. Michael Everhart (026)
7. Mark Roeder (027)
8. Amanda Jason (028)
9. Rachel Angel (029)
10. Kim Koury (030)
11. Scott Burgin (031)
12. Vanessa Joyce (032)
13. Tatia Muir (033)
14. Nicole Frangione (034)
15. Hannah Lee (035)
16. Paulette Dallas (036)
17. Paige Graff (037)
18. Thyren Castillo (038)
19. Libby Everhart (039)

## ATTACHMENT B

20. Joann Libolt (040)
21. Jodi Shannahan (041)
22. Saulius Jarasunas (042)
23. Harold Huttas (043)
24. Melissa Harris (044)
25. Roy Pachinsky (045)
26. Mychael Johnson (046)
27. Unidentified Commenter (047)
28. Kristina Slade (048)
29. Rochelle Travers (049)
30. Lydia Prescott (050)
31. Dorit Hanover (051)
32. D'ette Nogle (052)
33. Tiffany R. Koury (053)
34. Jennifer Whitley (054)
35. Jim Shannahan (055)
36. Danielle Hoover (056)
37. Nareg Burr (057)
38. Briana Krompler (058)
39. Marta Villalobos (059)
40. Hashi Clark (060)
41. William Cluverius (061)
42. Nina Kammer (062)
43. Kat Friis (063)
44. Jill Lundin (064)
45. Larry Olson (065)