



**OFFICE OF THE CITY ATTORNEY
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April 18, 2016

Corey Brandon Eib
16045 Sherman Way, # H-63
Van Nuys, CA 91406

RE: *People v. Corey Brandon Eib*
Citation # CJ56370

Dear Mr. Eib:

Contained herein is the People's response to the supplemental discovery request you submitted in the above-entitled case.

Please note that it is the People's position that our discovery obligations are limited to those specified in Penal Code § 1054.1, and subdivision (e) of that section is viewed as incorporating our constitutional discovery obligations. (Pen. Code § 1054, subd. (e); *In re Littlefield* (1993) 5 Cal.4th 122, 129.)

"[A]ll court-ordered discovery is governed exclusively by--and is barred except as provided by--the discovery chapter newly enacted by Proposition 115. . ." *In re Littlefield, supra*, 5 Cal.4th at 129.

The People object to the request to the extent that it asks that we "produce" all discovery sought. The People's duty is only to make items available. (*People v. Garner* (1961) 57 Cal.2d 142-143.)

1. **[By what method of valid identification is the state able to meet the FIRST/MIDDLE/LAST required for the name sequence on the citation per CA Judicial Council TR-Inst?]**

Objection. Not required under Penal Code section 1054 or *Brady*. No justification. (*Hill v. Superior Court* (1974) 10 Cal.3d 812, 817.) This request is civil in nature. Civil discovery procedure has no relevance to criminal prosecutions. (*Pitchess v. Superior Court* (1974) 11 Cal.3d 531, 536.)

2. **[What evidence exists that my presence in the United States is authorized under Federal Law?]**

Objection. Not required under Penal Code section 1054 or *Brady*. No justification. (*Hill v. Superior Court* (1974) 10 Cal.3d 812, 817.) This request is civil in nature. Civil discovery procedure has no relevance to criminal prosecutions. (*Pitchess v. Superior Court* (1974) 11 Cal.3d 531, 536.)

- 3a. **[Does the Los Angeles City Attorney's Office presume California exists as one of the several states? (as the term is used in Article 4 of the Federal Constitution)]**

Objection. Not required under Penal Code section 1054 or *Brady*. No justification. (*Hill v. Superior Court* (1974) 10 Cal.3d 812, 817.) This request is civil in nature. Civil discovery procedure has no relevance to criminal prosecutions. (*Pitchess v. Superior Court* (1974) 11 Cal.3d 531, 536.)

- 3b. **[Does the Los Angeles City Attorney's Office presume that California has citizens of its own? (As the term citizen is used in Article 4 of the Federal Constitution).]**

Objection. Not required under Penal Code section 1054 or *Brady*. No justification. (*Hill v. Superior Court* (1974) 10 Cal.3d 812, 817.) This request is civil in nature. Civil discovery procedure has no relevance to criminal prosecutions. (*Pitchess v. Superior Court* (1974) 11 Cal.3d 531, 536.)

- 3c. **[Does the Los Angeles City Attorney's Office presume that there are two completely separate governments within the boundaries as stated in the 1849 Constitution of California, a government of the state (as the term is used in Article 4 of the Federal Constitution) and a government of the United States?]**

Objection. Not required under Penal Code section 1054 or *Brady*. No justification. (*Hill v. Superior Court* (1974) 10 Cal.3d 812, 817.) This request is civil in nature. Civil discovery procedure has no relevance to criminal prosecutions. (*Pitchess v. Superior Court* (1974) 11 Cal.3d 531, 536.)

3d. [Does the Los Angeles City Attorney's Office have any evidence indicating my citizenship is anything other than that of being a citizen one of the several states?]

Objection. Not required under Penal Code section 1054 or *Brady*. No justification. (*Hill v. Superior Court* (1974) 10 Cal.3d 812, 817.) This request is civil in nature. Civil discovery procedure has no relevance to criminal prosecutions. (*Pitchess v. Superior Court* (1974) 11 Cal.3d 531, 536.)

Sincerely,



Ann J. Rosenthal
Deputy City Attorney