Date of Hearing:June 21, 2022Counsel:Mureed Rasool

ASSEMBLY COMMITTEE ON PUBLIC SAFETY Reginald Byron Jones-Sawyer, Sr., Chair

SB 1262 (Bradford) – As Introduced February 17, 2022

**SUMMARY:** Requires a superior court clerk to permit filtering searches of publicly-accessible electronic court indexes by a defendant's driver's license number, or date of birth, or both.

## **EXISTING LAW:**

- Requires the clerk of the superior court to keep such indexes as will insure ready reference to any action or proceeding filed in the court. There shall be separate indexes of plaintiffs and defendants in civil actions and of defendants in criminal actions. The name of each plaintiff and defendant shall be indexed and there shall appear opposite each name indexed the number of the action or proceeding and the name or names of the adverse litigant or litigants. (Gov. Code, § 69842.)
- 2) Finds and declares that local criminal justice agencies, such as policing agencies and courts, need quick access to accurate criminal offender record information. (Pen. Code, § 13100.)
- 3) Authorizes local criminal justice agencies to compile criminal offender record information, prohibits general access to it, except as specified, and imposes reporting requirements to the Department of Justice (DOJ). (Pen. Code, §§ 13100 et seq.)
- 4) Defines "criminal offender record information" as records and data compiled by criminal justice agencies for purposes of identifying criminal offenders and of maintaining as to each such offender a summary of arrests, pretrial proceedings, nature and disposition of criminal charges, sentencing, incarceration, rehabilitation, and release. (Pen. Code, § 13102.)
- 5) Requires specified information be included in criminal offender record information, such as name, sex, height, weight, and date of birth. (Pen. Code, § 13125.)
- 6) Authorizes local criminal justice agencies to furnish criminal offender record information to specified entities if they demonstrate a special need to acquire such information. (Pen. Code, § 13300.)
- Prohibits any person not authorized by law to receive a record, or information obtained from a record, to knowingly buy, receive, or possess such record or information. (Pen. Code, § 13304.)
- 8) Authorizes the DOJ to make a complete and systematic record index of all criminal offender record information received. (Pen. Code, § 11104.)

- 9) Makes it a misdemeanor for any employee of the DOJ, or any other authorized individual to furnish such information to a person not authorized by law to receive it. (Pen. Code, §§ 11141 & 11142.)
- 10) Requires DOJ to furnish state summary criminal history information to specified entities, if needed in the course of their duties, provided that when information is furnished to assist an agency, officer, or official of state or local government, a public utility, or any other entity in fulfilling employment, certification, or licensing duties, specified restrictions listed in the Labor Code are followed. (Pen. Code, § 11105, subd. (b).)
- 11) Allows the DOJ to release criminal history information to an official of a city, county, or district if expressly authorized by statute, ordinance or regulation. (Pen. Code, § 11105, subds. (b)(10)-(11).)
- 12) Authorizes the DOJ to release criminal history information to specified entities, if they demonstrate a "compelling need" for the information (Pen. Code, § 11105, subd. (c).)
- 13) Outlines the amount of criminal offender information the DOJ is allowed to furnish, dependent on who the recipient is. (Pen. Code, § 11105(k)-(p).)
- 14) Precludes an employer from asking applicants to disclose information concerning an arrest or detention that did not result in conviction, or information concerning a referral to, and participation in, any pretrial or posttrial diversion program, or concerning a conviction that has been dismissed or ordered sealed, and precludes any employer from seeking or utilizing such information as a factor in determining any condition of employment, any record of arrest or detention that did not result in conviction, or any record regarding a referral to, and participation in, any pretrial or posttrial diversion program, or concerning a conviction that has been judicially dismissed or ordered sealed pursuant to law. (Lab. Code, § 432.7 subd. (a)(1).)
- 15) Makes certain exemptions for employers hiring peace officers, health facility personnel, and other specified prospective employees. (Lab. Code, § 432.7.)
- 16) Requires employers to follow certain procedures prior to considering an applicant's criminal history as part of the hiring process. (Gov. Code, § 12952.)
- 17) Authorizes consumer reporting agencies to furnish consumer reports only under specified circumstances, including for the purpose of employment. (Civ. Code, § 1786.12.)
- 18) Precludes consumer reporting agencies from making or furnishing any report that contains, among other things, convictions that occurred more than seven years from the date of the report. (Civ. Code, § 1786.18.)

## **EXISTING FEDERAL LAW:**

1) Authorizes consumer reporting agencies to furnish a consumer report for employment purposes, among other things. (15 U.S.C.S., § 1681b.)

- Precludes consumer reporting agencies from making any report that contains, among other things, convictions that occurred more than seven years from the date of the report. (15 U.S.C.S., § 1681c.)
- 3) Preempts state laws as they relate to information contained in consumer reports if such state laws are inconsistent with federal law. (15 U.S.C.S., § 1681t.)

## FISCAL EFFECT: Unknown.

## **COMMENTS:**

 Author's Statement: According to the author, "SB 1262 will return public court record access to the status quo by allowing an individual to search and filter results by someone's date of birth and driver's license number. This bill is in response to a recent court decision which called for the removal of two identifiers (date of birth and driver's license number) from public court records. Many courts have since removed the ability to search and filter records based on date of birth and/or driver's license number.

The All of Us or None vs Hamrick decision did not prohibit the use of background checks entirely, nor did it prohibit being able to search the court indexes. Companies, nonprofits, apartment owners, and others will continue to perform background check on applicants, regardless of the outcome of this bill. Whether it be for liability or insurance purposes, or an organization wanting to maintain the safest environment, the Hamrick decision does not change these practices. But by prohibiting the use of these identifiers when searching, we are allowing a delay in that person's background check being completed and their application accepted, even if the applicant provided those identifiers willingly for the purpose of a background check."

2) Criminal History Databases in California: Access to person's summary criminal history information is generally prohibited and only allowed to be disseminated if specifically authorized in statute. "The state constitutional right of privacy extends to protect defendants from unauthorized disclosure of criminal history records. [Citation.] These records are compiled without the consent of the subjects and disseminated without their knowledge. Therefore, ... custodians of the records, have a duty to 'resist attempts at unauthorized disclosure and the person who is the subject of the record is entitled to expect that his right will be thus asserted.'" (*Westbrook v. County of Los Angeles* (1994) 27 Cal.App.4th 157, 165-66.) "The language of Penal Code section 13300 et seq., demonstrates that the Legislature intended nondisclosure of criminal offender record information to be the general rule." (*Id.* at 164.)

The DOJ is tasked with maintaining state summary criminal history information and the Attorney General is required to furnish state summary criminal history information only to statutorily specified entities or individuals for employment, licensing, volunteering etc. (Pen. Code, § 11105.) In addition to the specified entities authorized to receive state summary criminal history information, DOJ may furnish state summary criminal history information to other specified employers upon a showing of compelling need for the information and to any person or entity when they are required by statute to conduct a criminal background check. (Pen. Code, § 11105, subds. (a)(13) & (c).) The DOJ is required to release specific

information depending on who is requesting the information and for what purpose. For example, if a criminal justice agency wants background information for a peace officer, the DOJ must release not only convictions, but successfully diverted cases and every arrest or detention that did not result in exoneration, among other things. (Pen. Code, § 11105, subd. (k).) For other specified entities, the DOJ can only release convictions that have not had relief granted, and are not able to release information regarding successfully diverted cases. (Pen. Code, § 11105, subd. (p).) Unauthorized release or dissemination of such information is a misdemeanor. (Pen. Code, §§ 11141 & 11142.)

Local summary criminal history refers to the master record of information complied by any local criminal justice agency pertaining to the identification and criminal history of any person such as name, date of birth, physical description, dates of arrests, arresting agencies and booking numbers, charges, dispositions, and similar data about the person. (Pen. Code, § 13300, subd. (a).) Local criminal justice agencies are not allowed to furnish this information except to those specifically authorized in statute. (Pen. Code, § 13300, subd. (b).) Allowing or procuring unauthorized access to such records is prohibited and punishable as a misdemeanor. (Pen. Code, §§ 13302, 13304.)

However, because court records are publicly available (Gov. Code, § 69842), an individual or a company can bypass the DOJ and local criminal justice agencies to gather a great amount of information and create, in essence, their own summary criminal history database. The Rules of Court specify the manner by which electronic trial court records are to be made available to the public. The rules provide that a court maintaining civil case records in electronic form must provide electronic access to them, both remotely and at the courthouse, to the extent it is feasible to do so. (Cal. Rules of Court, Rule 2.503(b).) As to criminal records, the rule states that a court that maintains the criminal case records in electronic form must provide electronic access to them at the courthouse, to the extent it is feasible to do so, but may not provide public remote access. (Cal. Rules of Court, Rule 2.503(c)(5).) Additionally, the rules specify the information to be included in, and excluded from, electronic court indexes, as well as court calendars and registers of action. The contents that must be included in electronically accessible court indexes are case title (unless made confidential by law), party names (unless made confidential by law), party type, date on which the case was filed, and case number. (Cal. Rules of Court, Rule 2.507(b).) The information that must be excluded in electronically accessible court indexes are social security numbers, any financial information, arrest warrant information, search warrant information, victim and witness information, ethnicity, age, gender, government-issued identification card numbers, driver's license numbers, and dates of birth. (Cal. Rules of Court, Rule 2.507(c).)

This bill would require courts to filter searches by date of birth or driver's license number, thus potentially making each county superior court index a local summary criminal history database. Previously, many county superior court websites had allowed such searches in contravention of Rule 2.507 until recent case law prohibited it.

3) Recent Case Law Triggering This Bill: In All of Us or None – Riverside Chapter vs. Hamrick (2021) 64 Cal.App.5th 751, (Hamrick) plaintiffs alleged that the Riverside County Superior Court improperly maintained the court's records in criminal cases in various ways, one of which was allowing the public to search the court's electronic index on the court's website by a defendant's date of birth and driver's license number, in violation of California Rules of Court, rule 2.507 (*Id.* at p. 759.) The court agreed with plaintiffs that based on the clear language in Rule 2.507, the Riverside County Superior Court improperly authorized public access to electronic indexes of criminal cases by allowing the user to filter searches by an individual's date of birth or driver's license number. (*Id.* at 803.)

In reaching its holding, the court also examined the history and documents regarding the creation of Rule 2.507 and its predecessor, former Rule 2077. (*Id.* at 774.) The court noted that the Judicial Council, through its advisory and administrative committees, expressly considered and rejected including date of birth and driver's licenses as a search filters. (*Id.* at 771, 775.) As a matter of fact, the Judicial Council, as one of the reasons for excluding such search filters stated,

"... 'In an electronic database, the date of birth is a confidential field in criminal cases. In Westbrook v. County of Los Angeles (1994) 27 Cal.App.4th 157 [32 Cal. Rptr. 2d 382], the court held that the municipal court's electronic case management system was confidential as access would allow the compilation of a local criminal history summary in violation of ... section 13300. Under the same reasoning, the court should not allow narrowing the register of actions by [date of birth] as doing so would essentially be creating a local criminal history."

(*Id.* at 775.)

The court then examined the Judicial Council's purpose for restricting such filters. (*Id.*) The court noted that the Judicial Council, when drafting the rule, "...did not intend simply to maximize the public's access to information. Rather, the drafters sought to balance the public's access to court records with the privacy concerns of those involved in criminal proceedings." (*Id.* at 777.) The court then cited a report from the Judicial Council wherein the Judicial Council addressed its balancing concerns,

" 'In adopting this rule, the council recognized that the 'practical obscurity' of most court records provides individuals with some protection against the broad dissemination of private information that may be contained in public court records. Although court records are publicly available, most people do not go to the courthouse to search through records for private information, and in most cases that information is not widely disseminated. In contrast, if records are available over the Internet, they can be easily obtained by people all over the world.' "

#### (*Id.* at 777.)

The court followed that line of reasoning and stated that to allow the public to search court indexes by individual date of birth and driver's license information could eliminate the "practical obscurity" of criminal court records. (*Id.*) It went on to mention that without such personally identifying information linking an individual to court index information, the public would generally, "not be able to use a court index to determine whether a particular individual has a criminal record with the court (given the possibly of two defendants having the same name)." (*Id.* at 777-78.) Again, the Judicial Council struck such a balance in order to comply with the mandate imposed by Government Code section 69842 (requiring court to

publish publicly available indexes), while wanting to "ensur[e] that [criminal] records remain practically obscure." (*Id.* at 778.)<sup>1</sup>

This bill would tip that balance. The purpose of making court records accessible is to ensure transparency in governmental operations, while at the same time maintaining the privacy interests of an individual about whom the Government has compiled information. (*United States DOJ v. Reporters Comm. for Freedom of Press* (1989) 489 U.S. 749, 780 [stating, "The privacy interest in maintaining the practical obscurity of rap-sheet information will always be high. When the subject of such a rap sheet is a private citizen and when the information is in the Government's control as a compilation, rather than as a record of 'what the Government is up to,' the privacy interest protected by Exemption 7(C) is in fact at its apex while the FOIA-based public interest in disclosure is at its nadir."].) The information being sought in this bill is not designed for purposes of finding out "what the government is up to" but rather what information the government has compiled.

4) **Policy Considerations**: Of the many practical considerations raised by both the bill's proponents and opposition, one of the primary policy questions is deciding what entities should be able to access, compile, and disseminate criminal history information. Criminal history information is quite compelling in the sense that it could influence employers in hiring decisions, and landlords in granting rental applications, among other things.

Managing these databases is integral to ensuring the information they furnish is accurate and maintained properly. California has recent experience with some of the issues that can arise with databases, namely, CalGang, which was a law enforcement database pertaining to gangs that was overseen by two entities functioning independently from the State. (*The CalGang Criminal System: As the Result of Its Weak Oversight Structure, It Contains Questionable Information That May Violate Individuals' Privacy Rights*. California State Auditor. (2016) <<u>https://www.auditor.ca.gov/reports/search\_results</u>> at 1.) The report found that although there were assertions of compliance with federal regulations and state guidelines, there was scant evidence to suggest those standards were met. (*Id.* at 1.) The report found numerous instances where information was either unreliable, inaccurate, and used inappropriately. (*Id.* at 1-2.) As a result, the Legislature transferred management of the database to the DOJ and set policies, procedures, and oversight for the future use of shared gang databases. (See AB 90 (Weber) Chapter 695, Statutes of 2017; Pen. Code, § 186.34 et seq.)

When it comes to consumer reporting agencies, there are several federal and state regulations in place that are designed to ensure reliability and accuracy of background checks. However, there is little oversight of such entities. This could potentially be why there is a growing number of lawsuits against such companies, like Checkr, that make accusations of erroneous background checks costing people chances at employment. (*Locked out of the gig economy: When background checks get it wrong.* Protocol. (2020) <<u>https://www.protocol.com/checkr-gig-economy-lawsuits</u>> [as of Jun. 17, 2022].) The company is said to process approximately 1.5 million background checks every month, however:

<sup>&</sup>lt;sup>1</sup> The court in *Hamrick* emphasized that it was not addressing whether allowing such search filters constitutes an impermissible furnishing of criminal history information because the suit was brought against a superior court, which is protected under Civil Code section 3369. (*Id.* at 782.)

"Since 2015, Checkr has faced some 80 lawsuits under the Fair Credit Reporting Act, which regulates both credit reports and background checks... Roughly half of those suits have been filed in the last year alone. In court documents, the plaintiffs have accused Checkr of a wide range of wrongdoings, from mistaking them with other people to misreporting their offenses to including past criminal activity that is too old to report under the law... These cases, some of which have been dismissed or ended in confidential settlements, represent only a fraction of the complaints about Checkr flooding Twitter and online review sites, like the Better Business Bureau." (*Ibid.*)

Individuals can dispute these errors by accessing Checkr's online portal, but in order to access that portal, the individuals must check a box agreeing to Checkr's terms of service, which includes an arbitration provision. (*Ibid.*) Although arbitration can be beneficial in some ways, it can be detrimental in other ways. "By inserting individual arbitration clauses into a soaring number of consumer and employment contracts, companies like American Express devised a way to circumvent the courts and bar people from joining together in class-action lawsuits, realistically the only tool citizens have to fight illegal or deceitful business practices." (*Arbitration Everywhere, Stacking the Deck of Justice*. The New York Times. (2015) <<u>https://www.nytimes.com/2015/11/01/business/dcalbook/arbitration-</u>everywhere-stacking-the-deck-of-justice.html> [as of Jun. 17, 2022].)

Although this bill only deals with search filters for court indexes, it poses the critical question of how California should approach the availability and accessibility of criminal history information. Should there be a move towards a centralized database available through the DOJ, or should there be decentralization of such information? In either situation there would still likely be a need for greater oversight and accountability.

5) Argument in Support: According to *Checkr*, "As a Consumer Reporting Agency ('CRA') regulated under the federal Fair Credit Reporting Act ('FCRA') and California's Investigative Consumer Reporting Agencies Act ('ICRAA'), Checkr conducts background checks for statutorily authorized purposes, including employment, volunteering, and independent contracting. FCRA and ICRAA contain a number of protections for individuals during this process, including limiting the types of information that can be included on a background check; for example, under ICRAA, non-convictions and expunged records cannot be reported, and convictions can only be reported for seven years.

"As part of the background check process for the purposes listed above, an individual provides their written consent to a background check and certain personally identifying information such as name and date of birth ('DOB'). Based on this information, Checkr conducts a search of a court's electronic index to determine whether there are records that should be included in the background report. Prior to May 2021, Checkr could search a court's electronic index by using an individual's name and DOB to determine whether there were any associated records. If no results returned, then the search was complete. If records were returned, then Checkr would conduct a clerk-assisted search to retrieve more information about the record to determine whether the record belonged to the individual at issue and whether the record should be included in the background check. A clerk-assisted search would usually take a few days to complete. Given the ability to conduct searches with unique identifiers such as DOB, searches requiring clerk assistance were limited

(approximately 8%, prior to May 2021)...

"The removal of DOB as a search field has resulted in substantial delays in the background check process for individuals with common names and criminal records. Due to the inability to filter out results by a unique identifier like DOB, the number of searches requiring a clerk-assisted search has nearly doubled from 8% to 14% of all searches. This means that the number of searches requiring clerk assistance has gone from tens of thousands to more than six figures. This has created a substantial backlog for these searches, resulting in these checks taking weeks to months as opposed to a few days prior to May 2021. Not only do these delays impact people with criminal records, but it also affects those with common names. Based on the data in Checkr's system, these delays disproportionately impact individuals with Spanish surnames (see Appendix A, top 50 impacted names of delayed background checks). Looking at searches conducted in Los Angeles County (one of the first courts to remove the ability to search by DOB), Checkr has been averaging more than 20,000 background checks that have been pending for more than 30 days. The most impacted individuals all have Spanish surnames.

"Similarly, searches requiring clerk assistance have effectively reached a standstill in Sacramento County, where DOB was removed as a search parameter a few months ago. There are currently six thousand background checks requiring clerk assistance, most of which are taking two months to complete. At the current rate – and with the growing backlog of searches requiring clerk assistance – processing of these checks has effectively come to a standstill, thereby preventing these individuals from getting to work..."

6) Argument in Opposition: According to Root & Rebound, "Courts do not collect date of birth information in civil cases; however, they do in criminal cases. (Penal Code, § 11325.) Compiling criminal records with date of birth information helps criminal justice agencies create and share 'accurate and reasonably complete criminal offender record information' with one another 'for the performance of their official duties.' (Penal Code, § 13100.) Aside from criminal justice agencies, only those with a 'compelling need' can access criminal records compiled with the date of birth information. These include schools, nursing homes, licensing boards, and others who can show a 'compelling need' for the information. (Penal Code, §§ 11105, 13300.)

"The constitutional right to privacy restricts access to the criminal information compiled by criminal justice agencies. It prevents 'government and business conduct in . . . misusing information gathered for one purpose in order to serve other purposes' and 'to afford individuals some measure of protection against this most modern threat to personal privacy.' (White v. Davis (1975) 13 Cal.3d 757, 774.)...

"It is clear how commercial reports have come to cost less and become more instant than official DOJ rap sheets. Local courts are allowing commercial background check companies to access the criminal records compiled with the date of birth information for law enforcement purposes. The market for this cheap, instant information has grown exponentially in recent years. The Consumer Financial Protection Bureau (CFPB) cites a 2016 industry survey that approximately 59 percent of employers conduct criminal background checks. The number rose to nearly 90 percent by 2018. Due largely to the increasing demand, fueled by relentless marketing stoking our collective bias against "the felons," the background check industry collected a revenue of \$3.2 billion in 2019 alone. A

small piece of the pie goes to courts. For example, the Los Angeles County Superior Court reports that it makes an annual revenue of about \$7 million through its website that filters its 'criminal index' by date of birth or driver's license number.

"SB 1262 claims that the delay in commercial background checks caused by the Hamrick ruling 'disproportionately impacts individuals with common names and prevents these individuals from being able to secure work or housing on a timely basis.' However, we have yet to see evidence to support this claim. Instead of being denied work or housing, some formerly incarcerated people report that they are allowed to work or rent on a probationary basis while the background check results are pending.

"On the other hand, we know that the delay is in reducing the background check companies' margins and increasing the cost of a commercial background check. In this era of mass incarceration and collateral consequences, the Court's ruling asks us how much we are willing to pay for our biases against the formerly-incarcerated or convicted people. When a commercial background check costs more and takes longer, we would really have to believe in its utility to buy and use it.

"The Court's ruling disrupts the existing commercial market for criminal history information. The ruling certainly makes it more expensive, although not impossible, to compile a job applicant's criminal history. In response to the aftermath of the ruling, an industry group explains that each report requires "hundreds of criminal case files to be reviewed" manually. Employers with a compelling need can access DOJ rap sheets. Those without must be willing to bear the cost of a manual review process.

"SB 1262 erases the distinction between these two groups. Anyone, with or without a compelling need, would have access to the information compiled for law enforcement purposes. The bill affirms the self-serving argument of commercial background check companies that one's criminal history is always relevant and, therefore, should be made readily available to everyone."

## 7) Prior Legislation:

- a) AB 1008 (McCarty), Chapter 789, Statutes of 2017, requires employers to follow certain procedures prior to considering an applicant's criminal history as part of the hiring process.
- b) AB 2343 (Torres), Chapter 256, Statutes of 2012, requires that when state or federal summary criminal history information is furnished to an agency, organization or individual, a copy of the information be provided to the person about whom the information relates if there is an adverse employment, licensing, or certification decision.
- c) AB 2727 (Bradford), of the 2009-2010 Legislative Session, would have restricted the situations in which an employer could deny an application for employment based on a prior criminal conviction. AB 2727 failed passage in the Assembly Appropriations Committee.

## **REGISTERED SUPPORT / OPPOSITION:**

## Support

American Financial Services Association American Staffing Association Apartment Association of Greater Los Angeles Asian American Hotel Owners Association Brea Chamber of Commerce California Apartment Association California Association of Licensed Investigators California Bankers Association California Builders Alliance California Building Industry Association California Cable & Telecommunications Association California Chamber of Commerce California Credit Union League California Financial Services Association California Hospital Association California Hotel & Lodging Association California Restaurant Association California Retailers Association Carlsbad Chamber of Commerce Checkr, INC. Coalition for Sensible Public Records Access Consumer Data Industry Association Corona Chamber of Commerce Danville Area Chamber of Commerce Family Business Association of California Fountain Valley Chamber of Commerce Freemont Chamber of Commerce Fresno Chamber of Commerce Gilroy Chamber of Commerce Greater Conejo Valley Chamber of Commerce Greater High Desert Chamber of Commerce Imperial Valley Regional Chamber of Commerce LA Canada Flintridge Chamber of Commerce Laguna Niguel Chamber of Commerce Long Beach Area Chamber of Commerce Los Angeles Area Chamber of Commerce Mission Viejo Chamber of Commerce National Credit Reporting Association National Federation of Independent Business (NFIB) Newport Beach Chamber of Commerce Nna Services, LLC Nonprofits Insurance Alliance of California Official Police Garages of Los Angeles Professional Background Screening Association Rancho Cordova Chamber of Commerce Sacramento Regional Builders Exchange (SRBX)

San Jose Chamber of Commerce Santa Maria Valley Chamber of Commerce Simi Valley Chamber of Commerce Southern California Rental Housing Association Sue Weaver CAUSE Tulare Chamber of Commerce Valley Industry & Commerce Association West Ventura County Business Alliance

1 Private Individual

# **Opposition**

A New Way of Life Re-entry Project A New Way of Life Reentry Project All of Us or None Los Angeles California for Safety and Justice California Native Vote Project Californians United for A Responsible Budget Community Legal Services in East Palo Alto Legal Aid At Work Legal Services for Prisoners With Children Los Angeles Regional Reentry Partnership (LARRP) National Employment Law Project Oakland Privacy Privacy Rights Clearinghouse Root and Rebound Starting Over, INC.

Analysis Prepared by: Mureed Rasool / PUB. S. / (916) 319-3744