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*Via TrueFiling*

22 July 2021

The Honorable Chief Justice Tani Cantil-Sakauye & Associate Justices  
Supreme Court of California  
350 McAllister Street, Room 1295  
San Francisco, California 94102-4797

Re: *All of Us or None—Riverside Chapter, et al. v. W. Samuel Hamrick, Jr., et al.*  
Supreme Court Case No. S269654

Additional Co-Signatories to Amici Letter of Consumer Data Industry Association &  
Professional Background Screening Association Re: Petition for Review

Dear Chief Justice Cantil-Sakauye and Associate Justices:

On July 15, 2021, the Consumer Data Industry Association (CDIA) and the Professional Background Screening Association (PBSA) filed and served a letter as amici curiae pertaining to the petition for review filed by plaintiffs-appellants All of Us or None—Riverside Chapter, et al.

The letter included an Attachment B, which listed additional signatories and their respective statements of interest. (See California Rules of Court, rule 8.500(g)(2).)

The following organizations would like to join the entities listed in Attachment B in co-signing the CDIA and PBSA's amici letter. They respectfully request the Court to order review of the entirety of the Court of Appeal's published opinion in the above-referenced matter. (See California Rules of Court, rule 8.512(c)(2).)

1. Apartment Association of Orange County
2. California Alarm Association
3. California Association of Boutique & Breakfast Inns
4. California Hospital Association
5. California Hotel & Lodging Association
6. California Rental Housing Association

7. California State Council of the Society for Human Resources Management
8. DoorDash, Inc.
9. Hospitality Santa Barbara
10. Hotel Association of Los Angeles
11. Long Beach Hospitality Alliance
12. Public Record Retriever Network
13. Western Burglar and Fire Alarm Association Unilateral Apprenticeship and Training Program

Each organization listed herein has its own unique mission statement, all of which indicate an interest in supporting the amici curiae letter from the CDIA and the PBSA. (See California Rules of Court, rule 8.500(g)(2).)

*Apartment Association of Orange County.* The Apartment Association of Orange County is a non-profit trade association that advocates on behalf of rental-housing providers in Orange and Riverside Counties, whose ability to thoroughly screen their prospective renters would be negatively impacted by the removal of significant identifiers (date of birth or driver's license number) from criminal records.

*California Alarm Association.* The California Alarm Association (CAA) is a nonprofit state trade association representing the electronic security industry statewide and regulated by the Department of Consumer Affairs Bureau of Security and Investigative Services and the Contractors State Licensing Board. CAA's state licensing regulations require background checks through the Federal Bureau of Investigation.

*California Association of Boutique & Breakfast Inns.* The California Association of Boutique & Breakfast Inns is California's largest association of professional innkeepers and certified bed and breakfast inns. Similar to its state and local counterparts, the staff and contractors of represented establishments are charged with tasks such as entering guest rooms to clean, temporarily storing valuable items such as cars or luggage, and providing security for guests and other employees.

*California Hospital Association.* The California Hospital Association (CHA) is a nonprofit organization dedicated to representing the interests of California hospitals and the patients they serve. CHA represents more than 400 hospital and health system members and 97 percent of the patient beds in California, including general acute care hospitals, children's hospitals, rural hospitals, psychiatric hospitals, academic medical centers, county hospitals, investor-owned hospitals, and multi-hospital health systems. These hospitals furnish vital health care services to millions of Californians. CHA provides its members with state and federal representation in the legislative, judicial, and regulatory arenas, in an effort to improve health care quality, access and coverage; promote health care reform and integration; achieve adequate health care funding and contain costs; improve and update laws and regulations; and maintain public trust in health care.

CHA's members are responsible for protecting their patients, many or most of whom are in a very vulnerable condition. In this regard, they rely on background checks as a vital tool to help protect pediatric patients from child abuse (including sexual abuse), senior patients from elder abuse, and unconscious/comatose patients from abuse or theft of valuables, particularly when they arrive in the emergency department. CHA members also rely on background checks to identify individuals with known drug abuse problems and prevent them from obtaining employment that requires handling narcotics. CHA members' financial departments manage large sums of money and need to conduct background checks on employees who will be trusted to perform tasks in this area. Furthermore, hospitals are prohibited by federal law from employing or contracting with "excluded individuals." These are persons who have a conviction relating to patient abuse or health care fraud, student loan defaults, license revocation or suspension, obstruction of investigations, and other reasons.

*California Hotel & Lodging Association.* Established in 1893, the California Hotel & Lodging Association represents over 6,000 properties in California that provide lodging, food, and recreational services to traveling customers. Among other things, staff and contractors of represented establishments are placed in a position of trust and charged with tasks such as entering guest rooms to clean, temporarily storing valuable items such as cars or luggage, and providing security for guests and other employees.

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*California Rental Housing Association.* The California Rental Housing Association (CalRHA) represents over 19,000+ members totaling more than 536,000+ units, made up of small, medium, and large rental housing owners throughout the State of California. CalRHA's purpose is to advocate in the best interest of the rental housing industry and collectively address industry needs and challenges. CalRHA provides timely grassroots mobilization for the purpose of advocating at the State level and contributing to change in the multifamily housing industry.

*California State Council of the Society for Human Resources Management.* The California State Council of the Society for Human Resources Management is the largest organization of human resources professional members in California, and as part of ensuring a safe workplace for employees and employers, its members often are tasked with conducting reasonable background searches on applicants.

*DoorDash, Inc.* DoorDash, Inc., is a technology company that connects consumers with their favorite local and national businesses in California. DoorDash is required under California law to screen couriers providing delivery services for criminal records.

*Hospitality Santa Barbara.* Hospitality Santa Barbara is a local association dedicated to supporting the local lodging community by promoting safe and responsible hospitality policies. Similar to its state and local counterparts, the staff and contractors of represented establishments are charged with tasks such as entering guest rooms to clean, temporarily storing valuable items such as cars or luggage, and providing security for guests and other employees.

*Hotel Association of Los Angeles.* Representing the greater Los Angeles hotel industry for over 70 years, the Hotel Association of Los Angeles is the industry voice for hoteliers and their service and supplier partners. Similar to its state and local counterparts, the staff and contractors of represented establishments are charged with tasks such as entering guest rooms to clean, temporarily storing valuable items such as cars or luggage, and providing security for guests and other employees.

*Long Beach Hospitality Alliance.* The Long Beach Hospitality Alliance is a nonprofit business organization that was founded in 2015 in order to better support the growth and

success of the local hotel industry in Long Beach. Similar to its state and local counterparts, the staff and contractors of represented establishments are charged with tasks such as entering guest rooms to clean, temporarily storing valuable items such as cars or luggage, and providing security for guests and other employees.

*Public Record Retriever Network.*<sup>1</sup> Members of the Public Record Retriever Network (PRRN) are professionals who access government records on-site at local, federal, and state courts and recorder's offices, to do name searches and/or obtain copies of file documents. PRRN Members are often hired to assist with the pre-employment screening, investigations, lending, litigation, or legal compliance.

*Western Burglar and Fire Alarm Association Unilateral Apprenticeship and Training Program.* This nonprofit state and federally approved apprentice and training program for Fire/Life Safety Technicians is regulated by the Division of Apprenticeship Standards and the Department of Industrial Relations.

Respectfully Submitted,

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Consumer Data Industry Association &  
Professional Background Screening Association

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<sup>1</sup> The Public Record Retriever Network was a co-signatory on the original amici letter from CDIA and PBSA, but its statement of interest was inadvertently omitted and is therefore included here.

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<b>Notice: This form may be used to provide proof that a document has been served in a proceeding in the Court of Appeal. Please read <i>Information Sheet for Proof of Service (Court of Appeal)</i> (form APP-009-INFO) before completing this form. Do not use this form for proof of electronic service. See form APP-009E.</b>	
Case Name: ALL OF US OR NONE - RIVERSIDE CHAPTER v. HAMRICK Court of Appeal Case Number: S269654 Superior Court Case Number: 37-2017-00003005-CU-MC-NC	

1. At the time of service I was at least 18 years of age and **not a party to this legal action**.
2. My  residence  business address is (*specify*):  
Troutman Pepper Hamilton Sanders LLP, Three Embarcadero Center, Suite 800, San Francisco, CA 94111
3. I mailed or personally delivered a copy of the following document as indicated below (*fill in the name of the document you mailed or delivered and complete either a or b*):  
Additional Co-Signatories to Amici Letter of Consumer Data Industry Association & Professional Background Screening Association Re: Petition for Review
  - a.  **Mail**. I mailed a copy of the document identified above as follows:
    - (1) I enclosed a copy of the document identified above in an envelope or envelopes **and**
      - (a)  **deposited** the sealed envelope(s) with the U.S. Postal Service, with the postage fully prepaid.
      - (b)  **placed** the envelope(s) for collection and mailing on the date and at the place shown in items below, following our ordinary business practices. I am readily familiar with this business's practice of collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the U.S. Postal Service, in a sealed envelope(s) with postage fully prepaid.
    - (2) Date mailed: 7/22/2021
    - (3) The envelope was or envelopes were addressed as follows:
      - (a) Person served:
        - (i) Name:
        - (ii) Address:
      - (b) Person served:
        - (i) Name:
        - (ii) Address:
      - (c) Person served:
        - (i) Name:
        - (ii) Address:
- Additional persons served are listed on the attached page (*write "APP-009, Item 3a" at the top of the page*).
- (4) I am a resident of or employed in the county where the mailing occurred. The document was mailed from (city and state): San Francisco, CA

Document received by the CA Supreme Court.

Case Name: ALL OF US OR NONE - RIVERSIDE CHAPTER v. HAMRICK	Court of Appeal Case Number: S269654
	Superior Court Case Number: 37-2017-00003005-CU-MC-NC

3. b.  **Personal delivery.** I personally delivered a copy of the document identified above as follows:

(1) Person served:

(a) Name:

(b) Address where delivered:

(c) Date delivered:

(d) Time delivered:

(2) Person served:

(a) Name:

(b) Address where delivered:

(c) Date delivered:

(d) Time delivered:

(3) Person served:

(a) Name:

(b) Address where delivered:

(c) Date delivered:

(d) Time delivered:

Names and addresses of additional persons served and delivery dates and times are listed on the attached page (*write "APP-009, Item 3b" at the top of the page*).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 7/22/2021

Elizabeth Holt Andrews  
(TYPE OR PRINT NAME OF PERSON COMPLETING THIS FORM)

  
(SIGNATURE OF PERSON COMPLETING THIS FORM)

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**APP-009, Item 3a**

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