

# Exhibit 34

**From:** [Jung, Je Yon \(CRT\)](#)  
**To:** [Clarisse McCormack \(McCormack@mcao.maricopa.gov\)](mailto:Clarisse.McCormack@mcao.maricopa.gov)  
**Cc:** [Weiss, Daniel \(CRT\)](#); [Aminfar, Amin \(CRT\)](#); [Keenan, Elizabeth B \(CRT\)](#); [Chang, Patrick \(CRT\)](#); [Lopez-Ortiz, Luz \(CRT\)](#)  
**Subject:** Documents  
**Date:** Tuesday, May 05, 2009 1:11:22 PM

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Good Afternoon Clarisse-

Thank you for the call yesterday. As promised, I am getting back to you regarding your questions about IPro software. I learned the following from our litigation support colleagues:

We do use IPRO software for OCR (Optical Character Recognition), but depending on what I-Pro products you purchase, you can become a full scale copying shop. If you purchase I-Pro...you should be sure that you purchase the proper tools so that the its capable of:

- Scanning
- Bates labeling
- Running OCR
- Coding data to the images
- Document determination
- Redacting
- AND importantly: Providing load files so that we can load the materials directly into Summation or Concordance

Ensuring that it has all of these capabilities may result in added costs to the layered software purchase. In addition to the software, I presume you are considering the purchase of scanners/copiers to perform the document processing. As we discussed, in our experience, outside copying services are more economical and capable of performing all of the functions we need.

If you go forward with IPro...our litigation support folks have offered to speak directly with your IT personnel to make sure that the documents/data are input correctly, since the software is only a tool that processes the information, and cannot guarantee that the result will be helpful to either one of us unless it is utilized correctly from the beginning. Aaron Zajic is our contact in litigation support and he is cc'ed here. He welcomes the opportunity to talk to your IT personnel further about the process. His telephone number is 202.616.9965.

Again, we renew our offer to split the costs with an outside copying service to perform this task. In the alternative, you indicated that you would confirm whether we could move forward with a copying service in the interim while your software is purchased and implemented.

Finally, it is our understanding that you have agreed to provide us with a limited number of

documents pending resolution of the full document production:

1. To COR: sample blank visitation form; and sample blank grievance form. You indicated you would clarify whether the visitation form is completed by all individuals visiting an inmate, including lawyers, interpreters, etc., and how the visitation process operates generally (including policies and procedures for each jail).
2. To SPL: sample blank citation form; CAD report capabilities and data captured, including MCSO codes.
3. To COR and SPL: all passwords for access to training materials that can be accessed online, including that provided internally and by outside training organization to review available training material online.

Thank you and I hope this information is helpful. If you have any questions, please do not hesitate to contact us.

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