



Media Alliance
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CDCR,
Regulation and Policy Management Branch
P.O. Box 942883
Sacramento, CA 94283-0001
Email: LI.comments@cdcr.ca.gov

Re: Comment on Proposed Lethal Injection Regulations, Number 15-10

Dear Mr. Lockwood:

Media Alliance is a California-based democratic communications advocate. Our mission is excellence, ethics, diversity, and accountability in all aspects of the media in the interests of peace, justice, and social responsibility.

Media Alliance is deeply concerned about the CDCR's new proposed lethal injection regulations. The CDCR has a troubled past with regards to lethal injection, as do many other states that continue to go through extreme measures to salvage a death penalty system that we all know is broken from start to finish.

Media Alliance opposes implementing the proposed regulations on lethal injection as drafted. Specifically, we are concerned about the new proposed regulation's impact on news media and witnesses.

The death penalty represents a huge investment of resources for the residents of California as well as the weighty responsibility for the end of a life. It is important that all aspects of a state execution be subject to the scrutiny of the fourth estate acting at the behest of Californians to keep them informed. This is a fundamental precept of democracy and the proposed regulations do not do enough to ensure adequate sunlight on the sad occasions when the State executes a prisoner.

Currently, the regulations do not specify the **criteria for selecting the media outlets** that will be permitted to witness the execution or how much of the execution the media will be allowed to view (including pre/post procedures) – keeping numerous aspects of the execution in the dark. For example, the regulations do not allow media to observe the preparation of lethal injection drugs and do not address when the PA system broadcasting from the execution chamber will be on. The regulations also provide that the curtain between the execution and viewing chambers will be closed before critical phases of the procedure. The regulations need to be amended to accommodate all media who wish to witness the

execution, including providing an overflow room equipped with live televised viewing, while also allowing the media to witness visually or aurally all phases of the procedure.

Another area of concern for Media Alliance is the **lack of clarity surrounding the witness selection process**. As written, the regulations do not specify how the state will select witnesses and we feel strongly that there should be a process in place to ensure witnesses represent a diverse cross-section of the CA community.

As you know, the death penalty and its implementation are under increasing scrutiny nationally and across the globe where most developed countries have abandoned it. For as long as California continues to utilize a death penalty, which may not be too much longer, Media Alliance would insist that it be carried out transparently with news media and witnesses provided full and unimpeded access to provide information.

Sincerely,

Tracy Rosenberg
Media Alliance

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