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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF VENTURA**

BUEN VECINO,  
  
Petitioner/Plaintiff,  
  
v.  
  
COUNTY OF VENTURA and JAMES  
FRYHOFF, IN HIS OFFICIAL CAPACITY AS  
COUNTY OF VENTURA SHERIFF,  
  
Respondents/Defendants.

Case No.

**VERIFIED PETITION FOR WRIT OF  
MANDATE AND COMPLAINT FOR  
DECLARATORY AND INJUNCTIVE  
RELIEF UNDER THE CALIFORNIA  
CONSTITUTION AND THE CALIFORNIA  
PUBLIC RECORDS ACT; REQUEST FOR  
ATTORNEY FEES AND COSTS**

[California Constitution, Article I, section 3(b);  
California Public Records Act, Government  
Code § 7920.000, *et seq.*]

Petitioner and Plaintiff BUEN VECINO (“Petitioner”), a registered California nonprofit corporation and 501(c)(3) nonprofit organization located and operating in the County of Ventura, California, petitions the Court, through this Verified Petition for Writ of Mandate and Complaint

1 for Declaratory and Injunctive Relief under the California Constitution and California Public  
2 Records Act (“Petition”), to command Respondents and Defendants, COUNTY OF VENTURA  
3 (the “County”), and JAMES FRYHOFF, in his official capacity as the County of Ventura Sheriff  
4 (“Fryhoff”) (collectively, “Respondents”), to comply with the California Constitution, Article I,  
5 section 3(b), and the California Public Records Act (“CPRA”), Government Code § 7920.000, *et*  
6 *seq.*; to declare that Respondents have failed to do so; and to enjoin Respondents from  
7 continuing to violate the law by unlawfully withholding public records requested by Petitioner.

## 8 I. INTRODUCTION

9 1. This Petition is brought pursuant to the Cal. Const., Art. I, § 3(b), and the CPRA,  
10 codified at Gov. Code § 7920.000 *et seq.*

11 2. Cal. Const., Art. I, § 3(b) enshrines the fundamental right of the people to access  
12 public records. The CPRA codifies this fundamental right. The CPRA creates a presumption of  
13 disclosure for public records and mandates that a public agency, upon request, disclose public  
14 records without delay or obstruction except to the limited extent that agency can meet its burden  
15 to prove that a statutory exemption applies.

16 3. On July 31, 2025, Petitioner, under the CPRA, requested specific public records  
17 from Respondents, including body-worn camera recordings, regarding events that occurred on a  
18 single day – July 10, 2025 – at Glass House Farms, located in the County of Ventura.

19 4. On that day, according to a public Facebook statement by Respondent Fryhoff  
20 made the next day on July 11, 2025, various federal authorities conducted an immigration  
21 enforcement action at Glass House Farms in an unincorporated area of Camarillo in the County  
22 of Ventura. A true and correct copy of the July 11, 2025, public Facebook statement is attached  
23 as **Exhibit A**. According to Respondent Fryhoff, Respondents were given notice of the  
24 enforcement action by the federal authorities only 15 minutes before the action began. *Id.* During  
25 the course of the Camarillo enforcement action, community members and protestors arrived and  
26 expressed opposition to the conduct of the federal authorities. The federal authorities requested  
27 assistance from the Ventura County Sheriff’s Office. *Id.* In response, the Ventura County  
28 Sheriff’s Office sent a Tactical Response Team, with the limited “mission...to keep the peace

1 between protestors and federal agents” and “getting the federal agents and their arrestees out of  
2 the area safely.” *Id.* In the same public statement, Respondent Fryhoff stated that “the Ventura  
3 County Sheriff’s Office does not participate in immigration raids.” *Id.*

4 5. Petitioner’s July 31, 2025, CPRA request of Respondents sought public records  
5 regarding the events of July 10, 2025, including but not limited to body camera video footage  
6 from deputy sheriffs at or near the scene of the Camarillo immigration enforcement action  
7 (“Petitioner’s Request”). A true and correct copy of Petitioner’s Request is attached as **Exhibit**  
8 **B.**

9 6. On August 15, 2025, Respondents denied Petitioner’s Request in its entirety  
10 (Respondents’ Denial). A true and correct copy of Respondents’ Denial is attached as **Exhibit C.**

11 7. Respondents’ blanket denial of Petitioner’s Request violated the CPRA and  
12 Article I, section 3(b) of the California Constitution.

## 13 **II. PARTIES**

14 8. Petitioner BUEN VECINO is a registered California nonprofit corporation and  
15 501(c)(3) nonprofit organization located and operating in the County of Ventura, California.  
16 Petitioner’s mission is to cultivate an environment where the human dignity of every person is  
17 respected and where all people have equal rights. Petitioner has a particular focus on protecting  
18 the fundamental rights of the people of Ventura County who are targeted by federal authorities,  
19 including protection from the unlawful use of force, unlawful racial profiling, and unlawful  
20 arrest, search, and seizure by federal authorities.

21 9. Petitioner is a “person” within the meaning of Gov. Code § 7920.520 (“person  
22 includes any.... corporation”) and thus a “member of the public” within the meaning of Gov.  
23 Code § 7920.515. Given its mission and focus, Petitioner is beneficially interested in the  
24 outcome of these proceedings. Petitioner has a clear, present, and substantial right to the relief  
25 sought herein and no plain, speedy, and adequate remedy at law other than that sought herein.

26 10. Respondent COUNTY OF VENTURA (the “County”) is a local agency under  
27 Gov. Code § 7920.510(a) that is in possession of the records requested by Petitioner and located  
28 in the County of Ventura.

1           11.     Respondent JAMES FRYHOFF (“Fryhoff”) is the County of Ventura Sheriff and  
2 is the public official who oversees the department that has denied Petitioner access to the  
3 requested public records. Fryhoff is sued in his official capacity.

4                               **III.     JURISDICTION AND VENUE**

5           12.     This Court has jurisdiction over this matter pursuant to California Code of Civil  
6 Procedure (CCP) § 1085 (writ of mandate) and § 1060 (declaratory relief) and the CPRA, Gov.  
7 Code § 7923.000 (“[a]ny person may institute proceedings for injunctive or declarative relief, or  
8 for a writ of mandate...to enforce that person’s rights [under the CPRA] to inspect or to receive  
9 a copy of any public record or class of public records”) and § 7923.100 (“[w]henever it is made  
10 to appear, by verified petition to the superior court of the county where the records or some part  
11 thereof are situated, that certain public records are being improperly withheld...the court shall  
12 order the officer or other person charged with withholding the records to disclose those records  
13 or show cause why that person should not do so”).

14           13.     The relief sought by Petitioner is expressly authorized under Cal. Const., Art. I, §  
15 3(b), CCP § 1085 and § 1060, and the CPRA, Gov. Code § 7923.000 and § 7923.100. The  
16 availability of other legal remedies is not a bar to mandamus under the CPRA. *Wilder v.*  
17 *Superior Court*, 66 Cal. App. 4th 77, 82–83 (1998).

18           14.     Venue is proper under CCP § 394 and § 395 and the CPRA, Gov. Code §  
19 7923.100. Petitioner is informed and believes that the records to which Petitioner seeks access  
20 are situated in the County of Ventura and that the acts and events giving rise to the claim  
21 occurred in the County of Ventura.

22                               **IV.     FACTS SUPPORTING CAUSE OF ACTION**

23           15.     As described above, and as widely reported in news media, on July 10, 2025,  
24 federal authorities conducted an immigration enforcement action at Glass House Farms,  
25 including a Glass House Farms location in an unincorporated area of Camarillo in the County of  
26 Ventura. The enforcement action drew community members and protestors who opposed the  
27 conduct of the federal authorities, and those authorities responded by using force against the  
28 community members and protestors. *See, e.g.,* Santa Barbara Independent, July 10, 2025,

1 *Update: Federal Agents Deploy Smoke Bombs into Crowds During Raids of Glass House Farms*  
2 *Locations on Central Coast.*<sup>1</sup>

3 16. According to a July 11, 2025, public Facebook statement, Respondents were  
4 given notice of this Camarillo enforcement action by the federal authorities only 15 minutes  
5 before the action began. **Exhibit A.** According to Respondent Fryhoff, the Ventura County  
6 Sheriff's Office "was not involved in this [immigration enforcement action] until the FBI called  
7 and requested assistance." *Id.* The alleged basis for the requested assistance was an assertion by  
8 federal authorities that they "were being attacked by protestors." *Id.* According to Respondent  
9 Fryhoff, federal authorities reported using force during the immigration enforcement action,  
10 including "gas and munitions." *Id.*

11 17. According to Respondent Fryhoff, in response to the request for assistance, the  
12 Ventura County Sheriff's Office sent a "Tactical Response Team (TRT), a unit specially trained  
13 in managing civil disturbances and implementing crowd control and dispersal tactics." *Id.*

14 18. Also according to Respondent Fryhoff, the "mission" of the TRT was limited in  
15 scope – to "keep the peace between protestors and federal agents" and "getting the federal agents  
16 and their arrestees out of the area safely." *Id.*

17 19. Respondent Fryhoff elaborated,

18 Our commitment to preserving peace and preventing violence against federal officers and  
19 the public has....been mischaracterized as involvement by the Ventura County Sheriff's  
20 Office in immigration enforcement action. **Let me be clear, the Ventura County  
Sheriff's Office does not participate in immigration raids.** *Id.* (emphasis added).

21 20. The July 10, 2025, Camarillo immigration enforcement action – and in particular  
22 the use of force by federal agents during the action and the death of a worker who reportedly fell  
23 from a roof during the action – attracted widespread public interest and local and national news  
24 media attention. *See, e.g.,* Ventura County Star, July 18, 2025, *Families divided, rage, tear gas:*  
25 *How the Glass House raid went down*<sup>2</sup>; Los Angeles Times, July 13, 2025, *Details emerge about*

26 <sup>1</sup> Available at <https://www.independent.com/2025/07/10/federal-raids-hit-glass-house-farms-locations-on-central-coast/>

27 <sup>2</sup> Available at <https://www.vcstar.com/story/news/local/2025/07/18/families-divided-rage-tear-gas-how-the-glass-house-raid-went-down/85248835007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epi=z1lxx59p119750n11----c1l---d00---v1lxx59b0044xxd004465&gca-ft=138&gca-ds=sophi>

1 *pot-farm immigration raid as worker dies*;<sup>3</sup> The Guardian, July 11, 2025, *Farm worker dies a*  
2 *day after chaotic immigration raid at California farm*<sup>4</sup>; Washington Post, July 11, 2025, *Federal*  
3 *agents and protestors clash at major immigration raid at California farm*<sup>5</sup>; New York Times,  
4 July 11, 2025, *Federal Agents Clash With Protestors During Immigration Raid at California*  
5 *Farm*.<sup>6</sup>

6 21. The July 10, 2025, Camarillo immigration enforcement action also attracted  
7 attention and scrutiny from elected officials. For example, California Attorney General Rob  
8 Bonta joined a July 12, 2025, town hall with other County of Ventura elected officials and  
9 community leaders to address the July 10, 2025, Camarillo federal immigration enforcement  
10 action and similar actions carried out by federal authorities across California.<sup>7</sup> Attorney General  
11 Bonta criticized the “terror and chaos” caused by such actions and noted that such actions were  
12 part of a “strategy in Ventura County, Los Angeles, and throughout our state...using federal  
13 immigration agents as a tool to instill fear and to instill division.”<sup>8</sup> Other elected officials  
14 attended the July 12, 2025, town hall and criticized the July 10, 2025, Camarillo federal  
15 immigration enforcement action and related actions, including Assemblymember Jacqui Irwin,  
16 42nd Assembly District; State Sen. Monique Limón; and Ventura County Supervisor Vianey  
17 Lopez.<sup>9</sup>

18 22. U.S. Representative for the 24<sup>th</sup> Congressional District, Salud Carbajal,  
19 denounced the “aggressive behavior” of federal agents and called for transparency in connection  
20 with the Glass House Farms enforcement actions, noting that,

21 ICE’s claims of ‘doxxing’ and ‘violent mobs’ are attempts to deflect attention from their  
22 unjust tactics, distort the facts to support misleading narratives, and avoid accountability  
23 for their aggressive actions that caused injuries and left our community traumatized.<sup>10</sup>

24 <sup>3</sup> Available at <https://www.latimes.com/california/story/2025-07-12/ice-agents-raid-farm-mans-death>

25 <sup>4</sup> Available at <https://www.theguardian.com/us-news/2025/jul/11/california-farm-immigration-raid>

26 <sup>5</sup> Available at <https://www.washingtonpost.com/nation/2025/07/11/california-cannabis-farm-immigration-raid/>

27 <sup>6</sup> Available at <https://www.nytimes.com/2025/07/11/us/ice-raid-california-cannabis-farm.html>

28 <sup>7</sup> Available at [https://www.ojaivalleynews.com/news/government/community-leaders-join-ag-bonta-in-condemning-july-10-immigration-raid-in-camarillo/article\\_fdfc5e33-9af9-443e-b9eb-fffbe0fea3c8.html](https://www.ojaivalleynews.com/news/government/community-leaders-join-ag-bonta-in-condemning-july-10-immigration-raid-in-camarillo/article_fdfc5e33-9af9-443e-b9eb-fffbe0fea3c8.html).

<sup>8</sup> *Id.*

<sup>9</sup> *Id.*

<sup>10</sup> Available at <https://carbajal.house.gov/news/documentsingle.aspx?DocumentID=3297>.

1           23. Governor Gavin Newsom also denounced similar federal immigration  
2 enforcement actions occurring in the County of Los Angeles and across California,  
3 characterizing such raids as part and parcel of a “military dragnet” that made use of “tear  
4 gas...[f]lash bang grenades...[r]ubber bullets” to undermine democracy in California and  
5 nationwide.<sup>11</sup>

6           24. The local and national news media coverage and elected official and public  
7 interest in the July 10, 2025, Camarillo Glass House Farms federal immigration enforcement  
8 action mirrors nationwide news media coverage of and public interest in similar enforcement  
9 actions occurring in California and all over the country. *See, e.g.,* Literary Hub, July 21, 2025,  
10 *What ICE’s Assault on Ventura County, California Means for the Rest of America*<sup>12</sup>; CBS News,  
11 June 12, 2025, *Protests against immigration raids continue to spread across the U.S. Here’s a*  
12 *look at many of them*<sup>13</sup>; PBS, October 9, 2025, *ICE escalates aggressive raids in Chicago as*  
13 *Trump moves to deploy National Guard*<sup>14</sup>; AP News, June 13, 2025, *What to know about the*  
14 *protests over Trump’s immigration crackdown in LA and other cities*<sup>15</sup>; New York Times,  
15 November 3, 2025, *An Altercation With ICE Prompts a Police Chief to Push Back*<sup>16</sup>; NBC  
16 News, October 29, 2025, *DOJ indicts Democratic congressional candidate Kat Abughazaleh*  
17 *over ICE protests*<sup>17</sup>; New York Times, *11 N.Y. Officials Arrested Trying to Access ICE*  
18 *Detention Cells*.<sup>18</sup>

19           25. Against this broad backdrop of intense local, statewide, and national public  
20 interest, on July 31, 2025, Petitioner filed a request for public records in the possession and  
21 control of Respondents pursuant to the CPRA and the California Constitution in connection with

22 <sup>11</sup> Available at <https://www.gov.ca.gov/2025/06/10/governor-newsoms-address-to-california-democracy-at-a-crossroads/>.

23 <sup>12</sup> Available at <https://lithub.com/what-ices-assault-on-ventura-county-california-means-for-the-rest-of-america/>.

24 <sup>13</sup> Available at <https://www.cbsnews.com/news/protests-immigration-raids-spread-across-us-a-look-at-many-sporadic-violence/>.

25 <sup>14</sup> Available at <https://www.pbs.org/newshour/show/ice-escalates-aggressive-raids-in-chicago-as-trump-moves-to-deploy-national-guard>.

26 <sup>15</sup> Available at <https://apnews.com/article/insurrection-act-trump-troops-newsom-military-national-guard-a842f79e1c0e244039be274a6f266a7a>.

27 <sup>16</sup> Available at <https://www.nytimes.com/2025/11/03/us/politics/durango-colorado-ice-protester.html>.

27 <sup>17</sup> Available at <https://www.nbcnews.com/politics/justice-department/doj-indicts-democratic-congressional-candidate-kat-abughazaleh-ice-pro-rcna240584>.

28 <sup>18</sup> Available at <https://www.nytimes.com/2025/09/18/nyregion/elected-officials-arrested-ice-new-york.html>.

1 Respondents' limited, non-investigatory role in the July 10, 2025, Camarillo immigration  
2 enforcement action (as designated above, "Petitioner's Request"). **Exhibit B.** Petitioner  
3 requested three categories of records:

4 **Part 1)** "We request any and all body-worn camera footage, including audio, video, or  
5 photographs recorded at or in relation to the operation conducted by Homeland Security,  
6 Border Patrol, Immigration and Customs Enforcement, the FBI, the National Guard,  
7 and/or any other agency on July 10, 2025 at or near Glasshouse Farms in the  
8 unincorporated area of Camarillo. We seek all relevant records in your office's  
9 possession, regardless of who created them. If the video footage needs to be provided on  
10 a CD or DVD, we are prepared to provide or pay for the CD or DVD. Per the California  
11 Supreme Court's ruling on May 28, 2020, in National Lawyers Guild v. City of  
12 Hayward, the Public Records Act does not allow a law enforcement agency to charge a  
13 requestor of body camera footage for the staff time required to locate that footage and  
14 edit it to remove private information." *Id.*

15 **Part 2)** "Please provide us the names of all entity(/ies) that contacted the Ventura County  
16 Sheriff's Office and requested assistance during the operation at Glasshouse Farms on  
17 July 10, 2025, the time of the calls, any documentation of the requests for assistance, the  
18 time Ventura County Sheriff's Office personnel arrived at the scene, the number and rank  
19 of officers deployed, the incident commander at the scene, activities engaged in by  
20 officers at the scene, the number of vehicles sent to the scene, the number and types of  
21 weapons deployed at the scene, justification for implements of weapons deployed by  
22 officers responding to the call for assistance, and any reports of the Glasshouse Farms  
23 incident." *Id.*

24 **Part 3)** "We request all records of communication between the Ventura County Sheriff's  
25 Office, within the Ventura County Sheriff's Office, and among the Ventura County  
26 Sheriff's Office and the Department of Homeland Security, Border Patrol, Immigration  
27 and Customs Enforcement, the FBI, the National Guard, any other agency involved in the  
28 July 10, 2025 operation at Glasshouse Farms, and/or the United States Attorney



1 General's Office for the Central District of California, regarding the July 10, 2025  
2 operation at Glasshouse Farms." *Id.*

3 26. On August 15, 2025, Respondents denied Petitioner's Request in its entirety (as  
4 designated above, "Respondents' Denial"). **Exhibit C. On Part 1**), Respondents did not dispute  
5 that responsive body-worn camera video footage exists, but instead they claimed that such  
6 records are exempt from disclosure under Gov. Code § 7923.600 (the "investigatory records"  
7 exemption) and Gov. Code § 7922.000 (the "public interest" or "catchall" exemption). *Id.* On  
8 **Part 2**), Respondents claimed that "no records exist which are responsive to the specific request"  
9 and further claimed that "[o]ur office does not maintain the requested information in a format  
10 that can be retrieved through existing record-keeping systems." *Id.* On **Part 3**), Respondents  
11 claimed "no records exist which are responsive to the specific request." *Id.*

12 27. Respondents' Denial of Petitioner's Request, and each of Respondents' specific  
13 denials therein, are erroneous and inconsistent with the CPRA and the California Constitution,  
14 both of which require the disclosure of the requested records to Petitioner.

15 28. Respondents' violations of law set forth above will continue unless and until they  
16 are commanded by this Court to produce all records requested by Petitioner and to not engage in  
17 such further violations of law by a judgment declaring their conduct unlawful.

18 29. Additionally, absent injunctive relief, Respondents will continue to withhold  
19 public records as they have done here, resulting in great and irreparable injury to Petitioner and  
20 the public at large by depriving them of immediate access to information vital to the public  
21 interest and necessary for self-government.

22 30. Petitioner has no adequate remedy at law because the relief Petitioner seeks does  
23 not consist of monetary compensation but rather the enforcement of Petitioner's rights of access.  
24 Moreover, the harm Petitioner has suffered through Respondents' refusal to provide access to  
25 information that is required to be disclosed under California law cannot be compensated through  
26 an award of damages.

## 27 **V. SUMMARY OF LEGAL AUTHORITY**

28 31. The legal authority supporting this action will be set forth more fully in

1 Petitioner's merits briefing, but some relevant authority is summarized here.

2 32. The California Constitution and CPRA require state and local agencies to make  
3 any public record promptly available for inspection or copying upon request unless the record  
4 falls within a specific exemption from disclosure. Cal. Const., Art. I § 3(b)(1), (b)(7); Gov. Code  
5 §§ 7922.000, 7922.500, 7922.525, 7922.530, 7922.535.

6 33. The term "public records" includes any writing containing information relating to  
7 the conduct of the public's business prepared, owned, used, or retained by any state or local  
8 agency regardless of physical form or characteristics." Gov. Code § 7920.530(a). The term  
9 "writing" means "any handwriting, typewriting, printing, photostating, photographing,  
10 photocopying, transmitting by electronic mail or facsimile, and every other means of recording  
11 upon any tangible thing any form of communication or representation, including letters, words,  
12 pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless  
13 of the manner in which the record has been stored." Gov. Code § 7920.545.

14 34. In responding to a public records request, a public agency has a duty to assist the  
15 requester to "make a focused and effective request that reasonably describes an identifiable  
16 record or records," by doing all of the following, "to the extent reasonable under the  
17 circumstances": (1) "Assist the member of the public to identify records and information that are  
18 responsive to the request or to the purpose of the request, if stated"; (2) "Describe the  
19 information technology and physical location in which the records exist"; and (3) "Provide  
20 suggestions for overcoming any practical basis for denying access to the records or information  
21 sought." Gov. Code § 7922.600(a).

22 35. In responding to a public records request, a public agency has the duty to conduct  
23 an adequate search for responsive records, and the failure to comply with that duty can have the  
24 same effect as an outright refusal to disclose records. *See, e.g., Community Youth Athletic Center*  
25 *v. City of National City*, 220 Cal. App. 4th 1385, 1425–26 (2013).

26 36. An agency that withholds public records bears the burden to show that such  
27 withholding is justified by an exemption listed in the CPRA. Gov. Code § 7922.000.  
28

1           37. Under the California Constitution, any exemption from disclosure must be  
2 “narrowly construed.” Cal. Const., Art. I § 3, subd. (b)(2).

3           38. The CPRA’s exemption for records of “investigations conducted by ... any state  
4 or local police agency,” Gov. Code § 7923.600, covers only those records generated “as part of a  
5 targeted inquiry into any particular crime or crimes.” *American Civil Liberties Union*  
6 *Foundation of Southern California v. Superior Court*, 3 Cal. 5th 1032, 1042 (2017) (“*ACLU*”).  
7 It does not “shield everything law enforcement officers do from disclosure.” *Castañares v.*  
8 *Superior Court*, 98 Cal. App. 5th 295, 307 (2023) (quoting *Haynie v. Superior Court*, 26 Cal. 4th  
9 1061, 1071 (2001)). An agency cannot “avoid disclosure under the CPRA simply by labeling  
10 certain information ‘investigatory’.” *Id.* at 306 n.7.

11           39. The CPRA’s catchall exemption allows an agency to withhold records only if it  
12 can prove “on the facts of the particular case the public interest served by not disclosing the  
13 record clearly outweighs the public interest served by disclosure of the record.” Gov. Code  
14 § 7922.000. This “provision contemplates a case-by-case balancing process, with the burden of  
15 proof on the proponent of nondisclosure to demonstrate a clear overbalance on the side of  
16 confidentiality.” *American Civil Liberties Union Foundation v. Superior Court*, 3 Cal. 5th 1032,  
17 1043 (2017). To prevent the catchall exemption from becoming “a loophole used to improperly  
18 keep public records from the people,” courts must apply it sparingly and narrowly, remaining  
19 “alert to contentions by government entities that exaggerate the interest in nondisclosure, lest  
20 they be used as a pretext for keeping information secret for improper reasons, such as to avoid  
21 embarrassment over mistakes, incompetence, or wrongdoing.” *Los Angeles Unified School Dist.*  
22 *v. Superior Court*, 228 Cal. App. 4th 222, 250 (2014).

23           40. Even where part of a public record is properly exempt from disclosure, the public  
24 agency must provide the portions of such a record that are reasonably segregable. Gov. Code §  
25 7922.525.

26           41. When a public agency withholds a public record without justification, the court  
27 must order disclosure of the record. Gov. Code § 7923.110(a) (if “the public official’s decision  
28 to refuse disclosure is not justified...the court shall order the public official to make the record

1 public.”); Gov. Code § 7923.100 (“Whenever...certain public records are being improperly  
2 withheld...the court shall order the officer or other person charged with withholding the records  
3 to disclose those records...”).

## 4 **VI. CAUSE OF ACTION**

### 5 **(Unlawful Refusal to Disclose Public Records)**

6 42. Petitioner realleges and incorporates by this reference Paragraphs 1 through 41 of  
7 this Petition as though set forth here in full.

8 43. Petitioner’s Request describes “public records” as defined by the CPRA.

9 44. Petitioner’s Request describes public records that are subject to disclosure under  
10 the California Constitution and CPRA.

11 45. Respondents’ refusal to disclose public records sought in Petitioner’s Request  
12 violates Article I, section 3(b) of the California Constitution and the CPRA because Respondents  
13 cannot show that such records qualify for any exemption from disclosure.

14 46. Further, Respondents violated the CPRA by failing to perform an adequate search  
15 for records or to fulfill their duty to assist Petitioner in connection with Petitioner’s Request.

16 47. Accordingly, an actual controversy exists as to whether the public records  
17 requested by Petitioner exist and / or must be disclosed by Respondents, and whether those  
18 records, or any part thereof, are exempt from disclosure.

19 48. Petitioner has no plain, speedy, and adequate remedy to obtain the public records  
20 requested, other than this Petition. Petitioner is entitled to institute proceedings for a writ of  
21 mandate to enforce Petitioner’s rights and the public’s rights to obtain records responsive to  
22 Petitioner’s Request.

23 49. Furthermore, Petitioner is entitled to have the proceedings resolved on an  
24 expedited basis consistent “with the object of securing a decision to these matters at the earliest  
25 possible time.” Gov. Code § 7923.005.

## 26 **VII. PRAYER FOR RELIEF**

27 Wherefore, Petitioner prays as follows:  
28

1           1.       Issue a writ of mandate ordering Respondents to perform as required by the  
2 CPRA and preventing Respondents from violating the same, including by:

3           a.       Requiring Respondents to immediately disclose the body-worn camera recordings  
4 sought in **Part 1** of Petitioner's Request;

5           b.       Requiring Respondents to conduct a new, lawful search for records responsive to  
6 **Part 2** and **Part 3** of Petitioner's Request and disclose all responsive records except to  
7 the extent that Respondents meet their burden to prove that responsive records are subject  
8 to a statutory exemption; and

9           c.       Requiring Respondents to affirmatively assist in resolving any practical barriers  
10 that may arise to disclosure of records sought by Petitioner's Request;

11          2.       Issue a declaration that Respondents have violated and continue to violate the  
12 CPRA;

13          3.       Enjoining Respondents to provide the requested records and otherwise comply  
14 with the CPRA with respect to the requested records;

15          4.       Alternatively, if the Court does not immediately issue the relief set forth above  
16 and order Respondents to produce the records sought by Petitioner, that the Court order  
17 Respondents to show cause why the records should not be released and the requested relief  
18 should not be awarded and order Respondents to prepare a log of withheld records, and that it  
19 thereafter grant the requested relief and order that the requested records be disclosed;

20          5.       Alternatively, if the Court does not immediately issue the relief set forth above  
21 and order disclosure of the records sought by Petitioner, that the Court conduct an in camera  
22 review, if it deems it necessary, of some or all of the records sought by Petitioner pursuant to  
23 Gov. Code § 7923.105(a), and that it thereafter grant the requested relief and order that the  
24 requested records be disclosed;

25          6.       Find and determine that Petitioner is the prevailing party in this action within the  
26 meaning of Gov. Code § 7923.115;

27          7.       Order Respondents to pay Petitioner's reasonable attorneys' fees and costs  
28 pursuant to Gov. Code § 7923.115, CCP § 1021.5, and / or any other applicable law;

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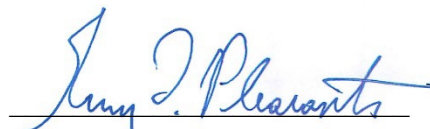
6. For judgment accordingly;

7. For such other and further relief as the Court may deem just and proper.

DATED: November 14, 2025

**Gregory Pleasants Law, APC**

By:



Gregory L. Pleasants  
Attorney for Petitioner Buen Vecino

**Moeel Lah Fakhoury LLP**

By:



Shaffy Moeel  
Attorney for Petitioner Buen Vecino

**First Amendment Coalition**

By:



David Loy  
Aaron R. Field  
Attorneys for Petitioner Buen Vecino

VERIFICATION

I, Willie Lubka, declare as follows:

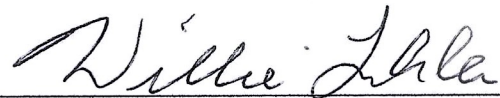
1. I am Executive Director of BUEN VECINO, the Petitioner and Plaintiff in the above-named action.

2. I have read the forgoing VERIFIED PETITION FOR WRIT OF MANDATE AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF UNDER THE CALIFORNIA CONSTITUTION AND THE CALIFORNIA PUBLIC RECORDS ACT; REQUEST FOR ATTORNEY FEES AND COSTS.

3. I have read the pleading and I am informed and believe the matters therein to be true and on that ground I allege that the matters stated therein are true.

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

Executed this 14<sup>th</sup> day of November, 2025, at Thousand Oaks, California.



Willie Lubka

## **Exhibit A**



**Ventura County Sheriff's Office's post****Ventura County Sheriff's Office** ✓

July 11 · 🌐

Yesterday, Homeland Security, Border Patrol, and members of the National Guard conducted an operation at Glasshouse Farms in the unincorporated area of Camarillo. Immigration and Customs Enforcement (ICE) agents notified our agency of this operation, for officer safety purposes, fifteen minutes before the execution of their search warrant. The search warrant stemmed from the business hiring illegal immigrants.

The Ventura County Sheriff's Office was not involved in this operation until the FBI called and requested assistance, advising that agents were being attacked by protestors. The FBI advised us that they had deployed gas and munitions and that they needed help.

In response to this dynamic and dangerous situation, the Ventura County Sheriff's Office promptly activated our Tactical Response Team (TRT), a unit specially trained in managing civil disturbances and implementing crowd control and dispersal tactics. Following coordination efforts, the TRT mobilized and arrived on site within approximately 90 minutes of the request to assist in restoring order.

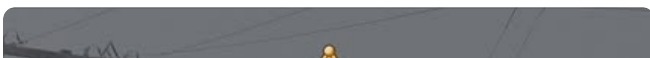
The mission of TRT was to keep the peace between protestors and federal agents. Another part of their mission included getting the federal agents and their arrestees out of the area safely. This process was delayed, as protestors blocked all exit points and threw nails on the road to disable the transport vehicles.

As soon as the last group of detainees was transported, the Ventura County Sheriff's Office removed all of our resources, and the remaining federal agents left the area. TRT cleared the scene last night at approximately midnight. I am happy to report that none of our deputies were injured, nor did they use force against anyone.

Our commitment to preserving peace and preventing violence against federal officers and the public has, in some instances, been mischaracterized as involvement by the Ventura County Sheriff's Office in immigration enforcement action. Let me be clear, the Ventura County Sheriff's Office does not participate in immigration raids. At the same time, we remain steadfast in our dedication to protecting all law enforcement personnel, federal or local, and ensuring the safety of our community.

The attached video, provided courtesy of Channel 7 News from yesterday's event at Glasshouse Farms, clearly highlights the severity of the violence that can occur during these types of incidents. The video depicts an individual brandishing a handgun, seemingly aiming and firing in the direction of the opposing federal agents. While no form of violence during protests is ever acceptable, this reprehensible and cowardly act is utterly intolerable and must not be condoned by anyone. It is my sincere hope that this individual will be quickly identified and held accountable for this serious and egregious crime.

— Jim Fryhoff, Ventura County Sheriff



## **Exhibit B**

July 31, 2025

**RE: California Public Records Act Request**

Dear Ventura County Sheriff's Office,

Pursuant to the California Public Records Act, California Government Code §§ 6250-6276.48, we kindly request the records described below. We ask that you please direct this request to all appropriate officers and offices within the Ventura County Sheriff's Office that may supply any of the information sought through this request.

1. We request any and all body-worn camera footage, including audio, video, or photographs recorded at or in relation to the operation conducted by Homeland Security, Border Patrol, Immigration and Customs Enforcement, the FBI, the National Guard, and/or any other agency on July 10, 2025 at or near Glasshouse Farms in the unincorporated area of Camarillo. We seek all relevant records in your office's possession, regardless of who created them. If the video footage needs to be provided on a CD or DVD, we are prepared to provide or pay for the CD or DVD. Per the California Supreme Court's ruling on May 28, 2020, in *National Lawyers Guild v. City of Hayward*, the Public Records Act does not allow a law enforcement agency to charge a requestor of body camera footage for the staff time required to locate that footage and edit it to remove private information.
2. Please provide us the names of all entity(/ies) that contacted the Ventura County Sheriff's Office and requested assistance during the operation at Glasshouse Farms on July 10, 2025, the time of the calls, any documentation of the requests for assistance, the time Ventura County Sheriff's Office personnel arrived at the scene, the number and rank of officers deployed, the incident commander at the scene, activities engaged in by officers at the scene, the number of vehicles sent to the scene, the number and types of weapons deployed at the scene, justification for implements of weapons deployed by officers responding to the call for assistance, and any reports of the Glasshouse Farms incident.
3. We request all records of communication between the Ventura County Sheriff's Office, within the Ventura County Sheriff's Office, and among the Ventura County Sheriff's Office and the Department of Homeland Security, Border Patrol, Immigration and Customs Enforcement, the FBI, the National Guard, any other agency involved in the July 10, 2025 operation at Glasshouse Farms, and/or the United States Attorney General's Office for the Central District of California, regarding the July 10, 2025 operation at Glasshouse Farms.

In responding to this request, please note that Article 1, § 3(b)(2) of the California Constitution explicitly requires you to broadly construe all provisions that further the public's right of access and to apply any limitations on access as narrowly as possible.

We look forward to receiving your response to this request within ten (10) calendar days, as required by Cal. Gov. Code § 6253(c). We request that any records that exist in electronic format be provided in electronic format.

If any part of this request is denied, we ask that your office describe with specificity each record withheld and justify in writing all deletions by reference to specific exemptions of the Public Records Act. Cal. Gov. Code § 6255. Please also disclose any portions of those records for which no exemption is claimed. We reserve the right to appeal a decision to withhold any records.

Please send electronic records via email to Willie Lubka at [lubka@buen-vecino.org](mailto:lubka@buen-vecino.org).

Please send any hard copies to the following address:

Buen Vecino  
Attention: Willie Lubka  
2625 Townsgate Road, Suite #330  
Westlake Village, CA 91361

If you have any questions regarding this request, please contact Willie Lubka at 805-218-1189 or [lubka@buen-vecino.org](mailto:lubka@buen-vecino.org).

Thank you in advance for your timely response.

Sincerely,

Willie Lubka  
Executive Director  
Buen Vecino



## **Exhibit C**

## Gregory Pleasants

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**Subject:** FW: Your County of Ventura public records request #25-2184 has been closed.

----- Forwarded Message -----

**Subject:** Your County of Ventura public records request #25-2184 has been closed.

**Date:** Fri, 15 Aug 2025 17:28:00 +0000

**From:** County of Ventura Clerk of the Board <[messages@nextrequest.com](mailto:messages@nextrequest.com)>

**Reply-To:** [ventura\\_25-2184-requester-notes@inbound.nextrequest.com](mailto:ventura_25-2184-requester-notes@inbound.nextrequest.com)

**To:** [lubka@buen-vecino.org](mailto:lubka@buen-vecino.org)

-- Attach a non-image file and/or reply ABOVE THIS LINE with a message, and it will be sent to staff on this request. --

### County of Ventura Public Records

**Record request #25-2184 has been closed. The closure reason supplied was:**

Willie Lubka

Beun Vecino

2625 Townsgate Road, Suite #330

Westlake Village, CO, 91361

[Lubka@buen-vecino.org](mailto:Lubka@buen-vecino.org)

RE: Public Records Request

Willie Lubka,

The Ventura County Sheriff's Office received notice of your public records request on July 31, 2025.

The Ventura County Sheriff's Office follows The California Public Records Act, Government Code (GC) 7920 et. al, when researching and reproducing records in response to requests for public records. The records requested are listed below, with our response provided in **bold**.

1. *"We request any and all body-worn camera footage, including audio, video, or photographs*

*recorded at or in relation to the operation conducted by Homeland Security, Border Patrol, Immigration and Customs Enforcement, the FBI, the National Guard, and/or any other agency on July 10, 2025 at or near Glasshouse Farms in the unincorporated area of Camarillo. We seek all relevant records in your office's possession, regardless of who created them. If the video footage needs to be provided on a CD or DVD, we are prepared to provide or pay for the CD or DVD. Per the California Supreme Court's ruling on May 28, 2020, in National Lawyers Guild v. City of Hayward, the Public Records Act does not allow a law enforcement agency to charge a requestor of body camera footage for the staff time required to locate that footage and edit it to remove private information.*

**In response to item 1, the Ventura County Sheriff's Office asserts that the records requested are exempt from disclosure pursuant to Government Code sections 7923.600 and 7922.000. These provisions exempt certain law enforcement investigative records from public release and protect against the unwarranted disclosure of personal information. The exemptions are invoked due to the specific nature of the call for service and to safeguard the privacy of the individuals involved, as well as to preserve the integrity of ongoing and future law enforcement operations.**

1. *Please provide us the names of all entity(/ies) that contacted the Ventura County Sheriff's Office and requested assistance during the operation at Glasshouse Farms on July 10, 2025, the time of the calls, any documentation of the requests for assistance, the time Ventura County Sheriff's Office personnel arrived at the*

*scene, the number and rank of officers deployed, the incident commander at the scene, activities engaged in by officers at the scene, the number of vehicles sent to the scene, the number and types of weapons deployed at the scene, justification for implements of weapons deployed by officers responding to the call for assistance, and any reports of the Glasshouse Farms incident.*

**In response to item 2, following a thorough and diligent search, the Ventura County Sheriff's Office has determined that no records exist which are responsive to the specific request. Our office does not maintain the requested information in a format that can be retrieved through existing record-keeping systems.**

**We can confirm that the Ventura County Sheriff's Administrative Office received two requests for assistance via a non-recorded telephone line from the Federal Bureau of Investigation (FBI), Ventura field office as well as the Ventura County Fire Department. In response, the Sheriff's Office promptly activated its Tactical Response Team (TRT). This activation was initiated through verbal communication with the TRT captain, who subsequently contacted and mobilized team members using department-issued cell phones. These communications were not recorded and are not documented in retrievable form.**

- 1. We request all records of communication between the Ventura County Sheriff's Office, within the*

*Ventura County Sheriff's Office, and among the Ventura County Sheriff's Office and the*

*Department of Homeland Security, Border Patrol, Immigration and Customs Enforcement, the FBI,*

*the National Guard, any other agency involved in the July 10, 2025, operation at Glasshouse Farms,*

*and/or the United States Attorney General's Office for the Central District of California, regarding*

*the July 10, 2025, operation at Glasshouse Farms."*



**In response to item 3, following a thorough and diligent search, the Ventura County Sheriff's Office has determined that no records exist which are responsive to the specific request.**

This response was researched and crafted by K. Kimbe, in collaboration with J. Casillas- Records Manager.

**[View Request 25-2184](#)**

<https://ventura.nextrequest.com/requests/25-2184>



# NextRequest

*Questions about your request? Reply to this email or sign in to contact staff at County of Ventura.*

*Technical support: See our [help page](#)*