

1 DAVID LOY, Cal. Bar No. 229235  
AARON R. FIELD, Cal. Bar No. 310648  
2 FIRST AMENDMENT COALITION  
534 4th Street, Suite B  
3 San Rafael, CA 94901-3334  
Telephone: 415.460.5060  
4 Email: dloy@firstamendmentcoalition.org  
afield@firstamendmentcoalition.org

5 Attorneys for Petitioner VALLEJO SUN LLC  
6  
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 COUNTY OF SOLANO  
10

11 VALLEJO SUN LLC,

12 Petitioner,

13 v.

14 CITY OF VALLEJO,

15 Respondent.  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No. CU25-10261

**DECLARATION OF SCOTT MORRIS IN  
SUPPORT OF MOTION FOR  
JUDGMENT GRANTING PETITION FOR  
DECLARATORY RELIEF AND WRIT OF  
MANDATE**

Date: April 29, 2026

Time: 10:00 a.m.

Dept: 3

Judge: Hon. Stephen Gizzi

Action filed: November 5, 2025

**ELECTRONICALLY FILED**

Superior Court of California,  
County of Solano

**01/23/2026 at 08:22:28 PM**

By: K. Schoenberg, Deputy Clerk

1 I, SCOTT MORRIS, declare:

2 1. I am a manager-member of Petitioner Vallejo Sun LLC (“petitioner” or “the *Sun*”).  
3 I make this declaration of my own personal knowledge, and, if called as a witness, I could testify  
4 to the facts stated herein.

5 2. In my capacity as the *Sun*’s Manager-Member, I have led the *Sun*’s newsroom in  
6 covering the shooting of Alexander Schumann by officers of the Vallejo Police Department.

7 3. On September 11, 2025, the City held a “VPD Critical Incident Community  
8 Meeting” concerning the shooting of Mr. Schumann (“Meeting”). The City published a recording  
9 of the Meeting, which includes redacted excerpts of video footage of the incident that the City  
10 displayed at the Meeting, on its website. The recording is available at

11 <https://vallejoca.portal.civicclerk.com/event/7585/media>.

12 4. At the Meeting, the City played some recordings of 911 calls about the incident and  
13 presented a selected subset of video footage related to the incident. The selected video footage  
14 appears to be certain body camera video footage from the officers who shot Schumann and certain  
15 dash camera video footage from their vehicle.

16 5. The City did not disclose all video and audio recordings related to Schumann’s  
17 shooting, either at the Meeting or afterward.

18 6. The City did not disclose dash camera video footage from a Vallejo police patrol  
19 vehicle that followed the vehicle which carried the officers who shot Schumann, either at the  
20 Meeting or afterward. On information and belief, the undisclosed dash camera footage depicts the  
21 shooting of Schumann.

22 7. The selected video footage disclosed by the City at the Meeting blurs the faces of  
23 officers involved in the incident who did not shoot at Schumann.

24 8. The City did not disclose at the Meeting, and has still not disclosed to this day,  
25 video footage that provides sufficient context preceding and following the firing of shots at  
26 Schumann to depict the entire incident involving the shooting of Schumann and enable the public  
27 to understand the circumstances of law enforcement’s response to the incident.  
28

1           9.       For example, the selection of redacted audio and video recordings disclosed at the  
2 Meeting left unclear what, if anything, officers had done to de-escalate the situation. At the  
3 Meeting, Mr. Schumann’s father posed this question to the City’s representatives. A Vallejo police  
4 spokesperson responded that officers had made “multiple attempts” to de-escalate and had “staged  
5 at the scene” and “contacted each other just to make sure that we had enough officers there in  
6 case.” However, the audio and video recordings played at the Meeting do not reflect any such  
7 information.

8           10.      The selection of redacted audio and video recordings played at the Meeting also left  
9 ambiguous what City police officers had been told about Mr. Schumann before they arrived at the  
10 scene. 911 call recordings that the City played at the Meeting revealed that callers had told the  
11 City before the shooting that Mr. Schumann was “a crazy person,” that he had “made a comment  
12 that he wanted the police to shoot him” and that he was “shooting a gun outside.” Yet, according  
13 to the City, this information may not have reached responding police officers. At the Meeting,  
14 Deputy Vallejo Police Department Chief Robert Knight stated, “City Officers attempted to gather  
15 additional information by contacting a witness via telephone, as well as checking whether  
16 Schumann had any firearms registered to him” but, “[b]ased upon what we know at this stage of  
17 the investigation, we do not believe the officers had any information that the subject was armed  
18 with a firearm.”

19           11.      In furtherance of the *Sun*’s reporting on the shooting of Mr. Schumann, on  
20 September 5, 2025, on behalf of the *Sun*, I made a Public Records Act to respondent City of  
21 Vallejo (“respondent” or “the City”) for “any video of the officer-involved shooting on Aug. 29  
22 under AB 748.” The City denominated the request as Request No. 25-1048 (“Request”).

23           12.      On September 15, 2025, the City denied the Request in its entirety, stating,  
24 “Pursuant to Penal Code Section 832.7(b)(8)(A), the City is not releasing the requested records as  
25 there is an active criminal investigation and the District Attorney’s Office has not yet determined  
26 whether to file criminal charges against any involved officer. Public interest in delaying disclosure  
27 of the requested information clearly outweighs the public interest in disclosure because disclosure  
28 of the requested information would interfere with any potential criminal enforcement proceeding.

1 The City expects to provide a response to your request on October 28, 2025.” A true and correct  
2 copy of the Request and City’s denial of September 15, 2025 is attached hereto as **Exhibit A**.

3 13. I responded by e-mail that the City had screened certain video footage of the  
4 incident at the Meeting and that the City had waived any exemptions for the footage it had already  
5 disclosed. A video recording of that meeting was, and remains as of the date of this declaration,  
6 available on the City’s website at <https://vallejoca.portal.civicclerk.com/event/7585/media>. The  
7 City replied to me by e-mail with a link to this video recording but no additional records. A true  
8 and correct copy of this e-mail exchange between myself and the City is attached hereto as  
9 **Exhibit B**.

10 14. On October 28, 2025, the City restated its denial of the Request, but no longer  
11 relied on a pending criminal investigation to support its position. Instead, it stated, “The City has  
12 released all records that are currently subject to public disclosure. The remainder of the requested  
13 records remain exempt as the filing of criminal charges is yet to be resolved in this matter.  
14 Therefore, the information in this case is exempt from disclosure pursuant to Penal Code  
15 § 832.7(b)(8)(B).” A true and correct copy of the City’s second denial of October 28, 2025 is  
16 attached hereto as **Exhibit C**.

17 15. To this day, the City has still not disclosed any records to the *Sun* in response to the  
18 *Sun*’s Request in this case other than the subset of excerpted and redacted recordings that the City  
19 played at the Meeting.

20 I declare under penalty of perjury that the foregoing is true and correct.

21 Executed on January 23, 2026 at Oakland, California.

22  
23   
24 SCOTT MORRIS

1 PROOF OF SERVICE


2 At the time of service, I was over 18 years of age and not a party to this action. I am  
3 employed in the County of Marin, State of California. My business address is 534 4th Street,  
Suite B, San Rafael, CA 94901-3334.

4 On January 23, 2026, I served true copies of the following document(s) described as  
5 **DECLARATION OF SCOTT MORRIS IN SUPPORT OF MOTION FOR JUDGMENT**  
6 **GRANTING PETITION FOR DECLARATORY RELIEF AND WRIT OF MANDATE** on  
the interested parties in this action as follows:

7 Katelyn M. Knight, Assistant City Attorney  
8 Kristoffer S. Jacob, Assistant City Attorney  
9 Sukhnandan Nijjar, Deputy City Attorney  
CITY OF VALLEJO, City Hall  
555 Santa Clara Street, 3rd Floor  
Vallejo, CA 94590  
Email: katelyn.knight@cityofvallejo.net;  
10 Sarah.Chesser@cityofvallejo.net

11 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the  
12 document(s) to be sent from e-mail address rregnier@firstamendmentcoalition.org to the persons  
13 at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after  
the transmission, any electronic message or other indication that the transmission was  
unsuccessful.

14 I declare under penalty of perjury under the laws of the State of California that the  
15 foregoing is true and correct. Executed on January 23, 2026, at East Palo Alto, California.

16   
17 Robin P. Regnier

## **Exhibit A**



Request Visibility: Published

<

>

Request 25-1048

Open



11 of 145 with filters active

Dates

Received

September 05, 2025 via web

Requester

Scott Morris

scott.morris@gmail.com

Oakland, CA

510-871-5114

Scott Morris News

Additional information

Preferred Contact Information

scott.morris@gmail.com

Staff assigned

Departments

No departments available

Point of contact

Lisa Peterson

Request

Please provide any video of the officer-involved shooting on Aug. 29 under AB 748. Let me know if you have any questions.

Timeline

Documents

Message to requester  Requester + Staff

Pursuant to Penal Code Section 832.7(b)(8)(A), the City is not releasing the requested records as there is an active criminal investigation and the District Attorney's Office has not yet determined whether to file criminal charges against any involved officer. Public interest in delaying disclosure of the requested information clearly outweighs the public interest in disclosure because disclosure of the requested information would interfere with any potential criminal enforcement proceeding. The City expects to provide a response to your request on October 28, 2025. Feel free to contact me with any questions.

Regards,

L. Peterson  
Administrative Analyst  
Professional Standards Division  
Vallejo Police Department  
[Vallejopd@CityofVallejo.net](mailto:Vallejopd@CityofVallejo.net)

September 15, 2025, 10:29am by Lisa Peterson, Administrative Analyst (Staff)

Request published 

Anyone with access to this request

September 8, 2025, 1:37pm by Lisa Peterson, Administrative Analyst (Staff)

Message to requester  Anyone with access to this request

Officially Receiving PRA Request

We have received your request for a public record. **Please note, if you are a party in a case and want to re-request your police report or traffic collision report, please contact the Records Division at (707) 648-4491 for further instructions. You may also request your police report online at [www.vallejopd.net](http://www.vallejopd.net).**

The California Public Records Act, Government Code §7921, et seq., gives you the right to obtain a copy of identifiable public records. Government Code §7922.535 provides that the City has up to 10 days after receipt of your request to determine whether to comply with your request and shall immediately notify you of this determination and the reasons therefor.

We will notify you in writing of the City's determination. Please do not hesitate to contact us if you have any questions.

September 8, 2025, 1:37pm by Lisa Peterson, Administrative Analyst (Staff)

Request opened 

Anyone with access to this request

Request received via web

September 5, 2025, 2:26pm by Scott Morris



## **Exhibit B**





Scott Morris &lt;scott.morris@gmail.com&gt;

---

**Video release of Aug. 29 police shooting**

2 messages

**Scott Morris** <scott.morris@gmail.com>

Mon, Sep 15, 2025 at 10:58 AM

To: Veronica Nebb &lt;veronica.nebb@cityofvallejo.net&gt;, Katelyn Knight &lt;Katelyn.Knight@cityofvallejo.net&gt;, lisa.peterson@cityofvallejo.net

Hi --

I submitted a request on Sept. 5 for all video of the Aug. 29 officer-involved shooting under AB 748. See [records request 25-1048](#). Bizarrely, I received a response today stating, "Pursuant to Penal Code Section 832.7(b)(8)(A), the City is not releasing the requested records as there is an active criminal investigation and the District Attorney's Office has not yet determined whether to file criminal charges against any involved officer. Public interest in delaying disclosure of the requested information clearly outweighs the public interest in disclosure because disclosure of the requested information would interfere with any potential criminal enforcement proceeding. The City expects to provide a response to your request on October 28, 2025."

The city already screened this video at a public meeting last week. The city can't selectively screen a video publicly but claim it is not releasable under the public records act. Any exemptions have been waived for the material that has already been screened, which must be released immediately.

Scott

Scott Morris  
Writer/Reporter  
(510) 871-5114

[@oakmorr](#)  
[scottmorris.news](#)

---

**Lisa Peterson** <Lisa.Peterson@cityofvallejo.net>

Mon, Sep 15, 2025 at 11:44 AM

To: Scott Morris &lt;scott.morris@gmail.com&gt;, Veronica Nebb &lt;Veronica.Nebb@cityofvallejo.net&gt;, Katelyn Knight &lt;Katelyn.Knight@cityofvallejo.net&gt;

Cc: Sukhnandan Nijjar &lt;Sukhnandan.Nijjar@cityofvallejo.net&gt;

Hi Scott,

My apologies, please see the link below from our VPD Critical Incident Community Meeting on September 11, 2025.

[VPD Critical Incident Community Meeting • City of Vallejo Meetings & Agendas • CivicClerk](#)

Thank you,

---

**Lisa Peterson**

**Administrative Analyst**

**Support, Analysis, and Reporting Division**

*City of Vallejo | Police Department*

Office: 707.648.4695 | [lisa.peterson@cityofvallejo.net](mailto:lisa.peterson@cityofvallejo.net)



*Spirit  
of the Bay*



*NOTICE OF CONFIDENTIALITY: This e-mail message, including any attachments, is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable laws. If you are not the intended recipient, you are notified that dissemination, distribution, or copying of this communication is strictly prohibited and may be a violation of law. If you have received this communication in error, please notify the sender by reply e-mail and delete all copies of the original message.*

[Quoted text hidden]

## **Exhibit C**

**[External Message Added] City of Vallejo public records request #25-1048**

1 message

**City of Vallejo Public Records** <messages@nextrequest.com>  
Reply-To: vallejo\_25-1048-requester-notes@inbound.nextrequest.com  
To: scott.morris@gmail.com

Tue, Oct 28, 2025 at 11:49 AM

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

## City of Vallejo Public Records

### A message was sent to you regarding record request #25-1048:

*The City has released all records that are currently subject to public disclosure. The remainder of the requested records remain exempt as the filing of criminal charges is yet to be resolved in this matter. Therefore, the information in this case is exempt from public disclosure pursuant to Penal Code § 832.7(b)(8)(B). We will provide you with another update on or by December 12, 2025. Feel free to contact me with any questions.*

Regards,

L. Peterson  
Administrative Analyst  
Professional Standards Division  
Vallejo Police Department  
[Vallejopd@CityofVallejo.net](mailto:Vallejopd@CityofVallejo.net)

[View Request 25-1048](https://vallejo.nextrequest.com/requests/25-1048)

<https://vallejo.nextrequest.com/requests/25-1048>