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*Exempt from filing fees pursuant to
Government Code section 6103*

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SACRAMENTO

11 **CALIFORNIA RURAL LEGAL**
12 **ASSISTANCE, INC.,** a California non-profit
corporation,
13
14 Petitioner,
15
16 **CALIFORNIA DEPARTMENT OF FOOD**
AND AGRICULTURE,
17
18 Respondent.

Case No. 25CV026236

**RESPONDENT CALIFORNIA
DEPARTMENT OF FOOD AND
AGRICULTURE’S ANSWER TO
CALIFORNIA RURAL LEGAL
ASSISTANCE, INC.’S VERIFIED
PETITION FOR WRIT OF MANDATE
AND DECLARATORY AND
INJUNCTIVE RELIEF**

Dept: 21
Judge: Hon. Shelleyanne W.L. Chang
Action Filed: November 3, 2025

19
20 Respondent California Department of Food and Agriculture (“CDFA” or “Respondent”)
21 answers the Verified Petition for Writ of Mandate and Declaratory and Injunctive Relief Under
22 the California Public Records Act [Gov. Code, § 7923.000] (“Petition”) filed by California Rural
23 Legal Assistance, Inc. (“CRLA” or “Petitioner”). Respondent answers the Petition by admitting,
24 denying, averring, and alleging as follows:
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INTRODUCTION¹

1
2 1. Respondent lacks sufficient knowledge or information to form a belief concerning the
3 truth of the factual allegations contained in paragraph 1, and on that basis denies such allegations.

4 Paragraph 1 further contains legal conclusions and argument to which no response is required.

5 2. Respondent lacks sufficient knowledge or information to form a belief concerning the
6 truth of the factual allegations contained in paragraph 2, and on that basis denies such allegations.

7 3. Respondent denies that CDFA “has refused to provide the public with critical
8 information related to the spread of H5N1,” and denies that it “refused to provide... *any* details
9 about the locations it has placed under quarantine due to bird flu outbreaks.” (Emphasis added.)

10 As to the remaining allegations in paragraph 3, Respondent lacks sufficient knowledge or
11 information to form a belief concerning the truth of the factual allegations asserted, and on that
12 basis denies such allegations.

13 4. Respondent admits that in January 2025, “CRLA submitted a request to CDFA under
14 the California Public Records Act.” To the extent the allegations in paragraph 4 purport to
15 summarize the Public Records Act request, Respondent refers the Court to that request for a full
16 and complete statement of its contents. Respondent denies the remaining allegations in paragraph
17 4.

18 5. Due to the vague nature of the term “empowered,” Respondent lacks sufficient
19 information to admit or deny the factual allegations contained in the final sentence of paragraph
20 5, and on that basis denies such allegations. As to the remaining allegations in paragraph 5,
21 Respondent lacks sufficient knowledge or information to form a belief concerning the truth of the
22 factual allegations asserted, and on that basis denies such allegations.

23 6. Respondent lacks sufficient knowledge or information to form a belief concerning the
24 truth of the factual allegations contained in paragraph 6, and on that basis denies such allegations.
25 Paragraph 6 further contains legal conclusions and argument to which no response is required.

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27
28 _____
¹ Header text appearing in the Petition is repeated for organizational clarity. To the extent
any header text contains any allegations, CDFA ₂ denies those allegations.

1 **PARTIES**

2 7. Respondent lacks sufficient knowledge or information to form a belief concerning the
3 truth of the factual allegations asserted in paragraph 7, and on that basis denies such allegations.

4 8. Respondent admits that CDFA is a California state agency headquartered in
5 Sacramento, California. As to the remaining allegations in paragraph 8, Respondent admits only
6 that Government Code sections 7920.525 and 7920.540 speak for themselves and no further
7 response is required. To the extent a further response is required, Respondent denies each and
8 every allegation of paragraph 8.

9 **JURISDICTION AND VENUE**

10 9. Paragraph 9 contains legal conclusions and argument to which no response is
11 required.

12 10. Respondent admits that CDFA is headquartered in Sacramento County. Respondent
13 further admits that at least some of the records at issue in this matter are located in Sacramento
14 County, but CDFA might also have other relevant records in satellite offices located in other
15 parts of the State. Paragraph 10 further contains legal conclusions and argument to which no
16 response is required.

17 **FACTUAL ALLEGATIONS**

18
19 11. To the extent the allegations in paragraph 11 purport to summarize, quote from, or
20 refer to the referenced articles, Respondent refers the Court to those articles for a full and
21 complete statement of their contents. To the extent a response is required, Respondent denies
22 each and every allegation in paragraph 11.

23 12. To the extent the allegations in paragraph 12 purport to summarize, quote from, or
24 refer to the referenced article, Respondent refers the Court to this article for a full and complete
25 statement of its contents. To the extent a response is required, Respondent denies each and every
26 allegation of paragraph 12.

1 13. To the extent the allegations in paragraph 13 purport to summarize, quote from, or
2 refer to the referenced article, Respondent refers the Court to this article for a full and complete
3 statement of its contents. To the extent a response is required, Respondent denies each and every
4 allegation of paragraph 13.

5 14. To the extent the allegations in paragraph 14 purport to summarize, quote from, or
6 refer to the referenced article, Respondent refers the Court to this article for a full and complete
7 statement of its contents. To the extent a response is required, Respondent denies each and every
8 allegation of paragraph 14.

9 15. To the extent the allegations in paragraph 15 purport to summarize, quote from, or
10 refer to the referenced articles, Respondent refers the Court to these articles for a full and
11 complete statement of their contents. To the extent a response is required, Respondent denies
12 each and every allegation of paragraph 15.

13 16. To the extent the allegations in paragraph 16 purport to summarize, quote from, or
14 refer to the referenced articles, Respondent refers the Court to these articles for a full and
15 complete statement of their contents. To the extent a response is required, Respondent denies
16 each and every allegation of paragraph 16.

17 17. To the extent the allegations in paragraph 17 purport to summarize, quote from, or
18 refer to the referenced articles, Respondent refers the Court to these articles for a full and
19 complete statement of their contents. To the extent a response is required, Respondent denies
20 each and every allegation of paragraph 17.

21 18. Paragraph 18 contains legal conclusions and argument to which no response is
22 required. To the extent a further response is required, Respondent denies each and every
23 allegation of paragraph 18.

24 19. Paragraph 19 contains legal conclusions and argument to which no response is
25 required. To the extent the allegations in paragraph 19 purport to summarize, quote from, or
26 refer to the referenced article, Respondent refers the Court to this article for a full and complete
27 statement of its contents. To the extent a response is required, Respondent denies each and every
28 allegation of paragraph 19.

1 20. Paragraph 20 contains legal conclusions and argument to which no response is
2 required. To the extent a response is required, Respondent denies each and every allegation of
3 paragraph 20.

4 21. Sentences 1, 2, and 3 of Paragraph 21 contain legal conclusions and argument to
5 which no response is required. To the extent a response is required, Respondent denies each
6 and every allegation contained therein. Respondent lacks sufficient knowledge or information to
7 form a belief concerning the truth of the factual allegations contained in the last sentence of
8 paragraph 21, and on that basis, denies each and every allegation contained therein.

9 22. Given the over-broad, generalized nature of the allegations in paragraph 22 for which
10 the Petition provides no source information, Respondent lacks sufficient knowledge or
11 information to form a belief concerning the truth of the factual allegations contain in paragraph
12 22, and on that basis denies each and every allegation of paragraph 22.

13 23. To the extent the allegations in paragraph 23 purport to summarize, quote from, or
14 refer to the referenced articles, Respondent refers the Court to these articles for a full and
15 complete statement of their contents. Respondent denies the Petition’s characterization that
16 CDFA “refused” to publicly disclose counties with known dairy infections, and instead admits
17 that it redacted the identities of such counties. To the extent a further response is required,
18 Respondent denies each and every allegation of paragraph 23.

19 24. To the extent the allegations in paragraph 24 purport to summarize, quote from, or
20 refer to the referenced articles, Respondent refers the Court to these articles for a full and
21 complete statement of their contents. To the extent a response is required, Respondent denies
22 each and every allegation of paragraph 24.

23 25. To the extent the allegations in paragraph 25 purport to summarize, quote from, or
24 refer to the referenced article, Respondent refers the Court to this article for a full and complete
25 statement of its contents. To the extent a response is required, Respondent denies each and every
26 allegation of paragraph 25.

27 26. To the extent the allegations in paragraph 26 purport to summarize, quote from, or
28 refer to the referenced articles, Respondent refers the Court to these articles for a full and

1 complete statement of their contents. To the extent a response is required, Respondent denies
2 each and every allegation of paragraph 26.

3 27. To the extent the allegations in paragraph 27 purport to summarize, quote from, or
4 refer to the referenced articles, Respondent refers the Court to these articles for a full and
5 complete statement of their contents. To the extent a response is required, Respondent denies
6 each and every allegation of paragraph 27.

7 28. To the extent the allegations in paragraph 28 purport to summarize, quote from, or
8 refer to the referenced articles, Respondent refers the Court to these articles for a full and
9 complete statement of their contents. To the extent a response is required, Respondent denies
10 each and every allegation of paragraph 28.

11 29. To the extent the allegations in paragraph 29 purport to summarize, quote from, or
12 refer to the referenced article, Respondent refers the Court to this article for a full and complete
13 statement of its contents. To the extent a response is required, Respondent denies each and every
14 allegation of paragraph 29.

15 30. To the extent the allegations in paragraph 30 purport to summarize, quote from, or
16 refer to the referenced article, Respondent refers the Court to this article for a full and complete
17 statement of its contents. Respondent denies that CDFA “has issued no public statements about
18 the spread of H5N1” since August 1, 2025. To the extent a further response is required,
19 Respondent denies each and every allegation of paragraph 30.

20 31. To the extent the allegations in paragraph 31 purport to summarize, quote from, or
21 refer to the referenced article, Respondent refers the Court to this article for a full and complete
22 statement of its contents. To the extent a response is required, Respondent denies each and every
23 allegation of paragraph 31.

24 32. To the extent the allegations in paragraph 32 purport to summarize, quote from, or
25 refer to the referenced article, Respondent refers the Court to this article for a full and complete
26 statement of its contents. To the extent a response is required, Respondent denies each and every
27 allegation of paragraph 32.
28

1 33. Respondent lacks sufficient knowledge or information to form a belief concerning the
2 truth of the factual allegations contain in paragraph 33, and on that basis denies each and every
3 allegation of paragraph 33.

4 34. To the extent the allegations in paragraph 34 purport to summarize, quote from, or
5 refer to the referenced article, Respondent refers the Court to this article for a full and complete
6 statement of its contents. To the extent a response is required, Respondent denies each and every
7 allegation of paragraph 34.

8 35. Respondent lacks sufficient knowledge or information to form a belief concerning the
9 truth of the factual allegations contain in paragraph 35, and on that basis denies each and every
10 allegation of paragraph 35.

11 36. Respondent lacks sufficient knowledge or information to form a belief concerning the
12 truth of the factual allegations contain in paragraph 36, and on that basis denies each and every
13 allegation of paragraph 36.

14 37. To the extent the allegations in paragraph 37 purport to summarize, quote from, or
15 refer to the contents of Petitioner’s Exhibit 1, Respondent refers the Court to Exhibit 1 for a full
16 and complete statement of its contents. As to the remaining allegations contained in paragraph 37,
17 Respondent lacks sufficient knowledge or information to form a belief concerning the truth of the
18 factual allegations contain in paragraph 37, and on that basis denies each and every allegation of
19 paragraph 37.

20 38. To the extent the allegations in paragraph 38 purport to summarize, quote from, or
21 refer to the contents of Petitioner’s Exhibit 2, Respondent refers the Court to Exhibit 2 for a full
22 and complete statement of its contents. To the extent a response is required, Respondent admits
23 that it engaged in correspondence with CRLA on January 24, 2025. Respondent denies the
24 remaining allegations of the paragraph.

25 39. Due to the vague nature of the phrase “identifiable agency employees,” Respondent
26 lacks sufficient information to admit or deny the factual allegations contained in paragraph 39,
27 and on that basis denies such allegations.
28

1 40. To the extent the allegations in paragraph 40 purport to summarize, quote from, or
2 refer to the contents of CDFA’s response to CRLA’s Request dated January 24, 2025,
3 Respondent refers the Court to Petitioner’s Exhibit 2 for a full and complete statement of its
4 contents. To the extent a response is required, Respondent denies each and every allegation of
5 paragraph 40.

6 41. To the extent the allegations in paragraph 41 purport to summarize, quote from, or
7 refer to the contents of Petitioner’s Exhibit 3, Respondent refers the Court to Exhibit 3 for a full
8 and complete statement of its contents. To the extent a response is required, Respondent denies
9 each and every allegation of paragraph 41.

10 42. To the extent the allegations in paragraph 42 purport to summarize, quote from, or
11 refer to the contents of Petitioner’s Exhibit 4, Respondent refers the Court to Exhibit 4 for a full
12 and complete statement of its contents. To the extent a response is required, Respondent denies
13 each and every allegation of paragraph 42.

14 43. To the extent the allegations in paragraph 43 purport to summarize, quote from, or
15 refer to the contents of Petitioner’s Exhibit 5, Respondent refers the Court to Exhibit 5 for a full
16 and complete statement of its contents. To the extent a response is required, Respondent denies
17 each and every allegation of paragraph 43.

18 44. To the extent the allegations in paragraph 44 purport to summarize, quote from, or
19 refer to the contents of Petitioner’s Exhibit 6, Respondent refers the Court to Exhibit 6 for a full
20 and complete statement of its contents. To the extent a response is required, Respondent denies
21 each and every allegation of paragraph 44.

22 45. To the extent the allegations in paragraph 45 purport to summarize, quote from, or
23 refer to the contents of Petitioner’s Exhibit 7, Respondent refers the Court to Exhibit 7 for a full
24 and complete statement of its contents. To the extent a response is required, Respondent denies
25 each and every allegation of paragraph 45.

26 46. To the extent the allegations in paragraph 46 purport to summarize, quote from, or
27 refer to the contents of Petitioner’s Exhibit 8, Respondent refers the Court to Exhibit 8 for a full
28

1 and complete statement of its contents. To the extent a response is required, Respondent denies
2 each and every allegation of paragraph 46.

3 47. To the extent the allegations in paragraph 47 purport to summarize, quote from, or
4 refer to the contents of Petitioner's Exhibit 9, Respondent refers the Court to Exhibit 9 for a full
5 and complete statement of its contents. To the extent a response is required, Respondent denies
6 each and every allegation of paragraph 47.

7 48. To the extent the allegations in paragraph 48 purport to summarize, quote from, or
8 refer to the contents of Petitioner's Exhibit 10, Respondent refers the Court to Exhibit 10 for a
9 full and complete statement of its contents. To the extent a response is required, Respondent
10 denies each and every allegation of paragraph 48.

11 49. To the extent the allegations in paragraph 49 purport to summarize, quote from, or
12 refer to the contents of Petitioner's Exhibit 11, Respondent refers the Court to Exhibit 11 for a
13 full and complete statement of its contents. To the extent a response is required, Respondent
14 denies each and every allegation of paragraph 49.

15 50. To the extent the allegations in paragraph 50 purport to summarize, quote from, or
16 refer to the contents of Petitioner's Exhibits 12 and 13, Respondent refers the Court to Exhibits 12
17 and 13 for a full and complete statement of their contents. To the extent a response is required,
18 Respondent denies each and every allegation of paragraph 50.

19 51. To the extent the allegations in paragraph 51 purport to summarize, quote from, or
20 refer to the contents of Petitioner's Exhibit 14, Respondent refers the Court to Exhibit 14 for a
21 full and complete statement of its contents. To the extent a response is required, Respondent
22 denies each and every allegation of paragraph 51.

23 52. To the extent the allegations in paragraph 52 purport to summarize, quote from, or
24 refer to the contents of Petitioner's Exhibit 15, Respondent refers the Court to Exhibit 15 for a
25 full and complete statement of its contents. To the extent a response is required, Respondent
26 denies each and every allegation of paragraph 52.

27 53. To the extent the allegations in paragraph 53 purport to summarize, quote from, or
28 refer to the contents of Petitioner's Exhibit 16, Respondent refers the Court to Exhibit 16 for a

1 full and complete statement of its contents. To the extent a response is required, Respondent
2 denies each and every allegation of paragraph 53.

3 54. In response to the allegations in paragraph 54, Respondent refers the Court to
4 Petitioner's Exhibit 17—correspondence from Respondent to Petitioner dated May 2, 2025—for a
5 full and complete statement of its contents. To the extent a response is required, Respondent
6 denies each and every allegation of paragraph 54.

7 55. To the extent the allegations in paragraph 55 purport to summarize, quote from, or
8 refer to the contents of Petitioner's Exhibits 17 and 18, Respondent refers the Court to Exhibits 17
9 and 18 for a full and complete statement of their contents. To the extent a response is required,
10 Respondent denies each and every allegation of paragraph 55.

11 56. In response to the allegations in paragraph 56, Respondent refers the Court to
12 Petitioner's Exhibit 20—correspondence from Respondent to Petitioner dated May 22, 2025—for
13 a full and complete statement of its contents. To the extent a response is required, Respondent
14 denies each and every allegation of paragraph 56.

15 57. To the extent the allegations in paragraph 57 purport to summarize, quote from, or
16 refer to the contents of Petitioner's Exhibit 19, Respondent refers the Court to Exhibit 19 for a
17 full and complete statement of its contents. To the extent a response is required, Respondent
18 denies each and every allegation of paragraph 57.

19 58. To the extent the allegations in paragraph 58 purport to summarize, quote from, or
20 refer to the contents of Petitioner's Exhibits 20 and 21, Respondent refers the Court to Exhibits 20
21 and 21 for a full and complete statement of their contents. To the extent a response is required,
22 Respondent denies each and every allegation of paragraph 58.

23 59. Respondent admits that the records in Production 1 and subsequent productions speak
24 for themselves and on that basis, no further response is required. To the extent a response is
25 required, Respondent denies each and every allegation of paragraph 59.

26 60. Respondent admits that on May 22, 2025, it produced 214 pages of records,
27 Bates_0001-0214. To the extent the remaining allegations in paragraph 60 purport to summarize,
28 quote from, or refer to the contents of Petitioner's Exhibits 20 and 21, Respondent refers the

1 Court to Exhibits 20 and 21 for a full and complete statement of their contents. To the extent a
2 response is required, Respondent denies each and every allegation of paragraph 60.

3 61. To the extent the allegations in paragraph 61 purport to summarize, quote from, or
4 refer to the contents of Petitioner's Exhibits 20 and 21, Respondent refers the Court to Exhibits 20
5 and 21 for a full and complete statement of their contents. To the extent a response is required,
6 Respondent denies each and every allegation of paragraph 61.

7 62. To the extent the allegations in paragraph 62 purport to summarize, quote from, or
8 refer to the contents of Petitioner's Exhibit 22, Respondent refers the Court to Exhibit 22 for a
9 full and complete statement of its contents. To the extent a response is required, Respondent
10 denies each and every allegation of paragraph 62.

11 63. To the extent the allegations in paragraph 63 purport to summarize, quote from, or
12 refer to the contents of Petitioner's Exhibit 23, Respondent refers the Court to Exhibit 23 for a
13 full and complete statement of its contents. To the extent a response is required, Respondent
14 denies each and every allegation of paragraph 63.

15 64. To the extent the allegations in paragraph 64 purport to summarize, quote from, or
16 refer to the contents of Petitioner's Exhibit 24, Respondent refers the Court to Exhibit 24 for a
17 full and complete statement of its contents. To the extent a response is required, Respondent
18 denies each and every allegation of paragraph 64.

19 65. To the extent the allegations in paragraph 65 purport to summarize, quote from, or
20 refer to the contents of Petitioner's Exhibit 25, Respondent refers the Court to Exhibit 25 for a
21 full and complete statement of its contents. To the extent a response is required, Respondent
22 denies each and every allegation of paragraph 65.

23 66. To the extent the allegations in paragraph 66 purport to summarize, quote from, or
24 refer to the contents of Petitioner's Exhibit 26, Respondent refers the Court to Exhibit 26 for a
25 full and complete statement of its contents. To the extent a response is required, Respondent
26 denies each and every allegation of paragraph 66.

27 67. To the extent the allegations in paragraph 67 purport to summarize, quote from, or
28 refer to the contents of Petitioner's Exhibits 27 and 28, Respondent refers the Court to Exhibits 27

1 and 28 for a full and complete statement of their contents. To the extent a response is required,
2 Respondent denies each and every allegation of paragraph 67.

3 68. To the extent the allegations in paragraph 68 purport to summarize, quote from, or
4 refer to the contents of Petitioner’s Exhibit 29, Respondent refers the Court to Exhibit 29 for a
5 full and complete statement of its contents. To the extent a response is required, Respondent
6 denies each and every allegation of paragraph 68.

7 69. In response to the allegations in paragraph 69, Respondent refers the Court to
8 Petitioner’s Exhibit 30—correspondence from Respondent to Petitioner dated July 18, 2025—for
9 a full and complete statement of its contents. To the extent a response is required, Respondent
10 denies each and every allegation of paragraph 69.

11 70. Respondent admits that it produced 819 pages of records, Bates_000215-001033, on
12 July 18, 2025. To the extent the remaining allegations in paragraph 70 purport to summarize,
13 quote from, or refer to the contents of Petitioner’s Exhibits 30 and 31, Respondent refers the
14 Court to Exhibits 30 and 31 for a full and complete statement of their contents. To the extent a
15 response is required, Respondent denies each and every allegation of paragraph 70.

16 71. Respondent admits that it produced 801 pages of records, Bates_001033-001833, on
17 July 23, 2025. To the extent the remaining allegations in paragraph 71 purport to summarize,
18 quote from, or refer to the contents of Petitioner’s Exhibits 32 and 33, Respondent refers the
19 Court to Exhibits 32 and 33 for a full and complete statement of their contents. To the extent a
20 response is required, Respondent denies each and every allegation of paragraph 71.

21 72. To the extent the allegations in paragraph 72 purport to summarize, quote from, or
22 refer to the contents of Petitioner’s Exhibits 34–36, Respondent refers the Court to Exhibits 34–
23 36 for a full and complete statement of their contents. To the extent a response is required,
24 Respondent denies each and every allegation of paragraph 72.

25 73. Respondent admits that it produced 277 pages of records, Bates_01833-02109, on
26 August 20, 2025. To the extent the remaining allegations in paragraph 73 purport to summarize,
27 quote from, or refer to the contents of Petitioner’s Exhibits 37 and 38, Respondent refers the
28

1 Court to Exhibits 37 and 38 for a full and complete statement of their contents. To the extent a
2 response is required, Respondent denies each and every allegation of paragraph 73.

3 74. Respondent admits that the documents pertaining to March 28 and May 2 as well as
4 the documents produced by CDFA speak for themselves, and on that basis, no further response is
5 required. To the extent a response is required, Respondent denies each and every allegation of
6 paragraph 74.

7
8 **CAUSE OF ACTION**

9 **Violations of the California Public Records Act**

10 **[Gov. Code, § 7923.00]**

11 75. Paragraph 75 incorporates by reference Petitioner's allegations in paragraphs 1
12 through 74 of the Petition, and Respondent correspondingly responds by incorporating by
13 reference its responses set forth in paragraphs 1 through 74 above.

14 76. The statement in paragraph 76 is a conclusion of law and therefore does not require a
15 response. To the extent a response is required, Respondent denies each and every allegation of
16 paragraph 76.

17 77. The statement in paragraph 77 is a conclusion of law and therefore does not require a
18 response. To the extent a response is required, Respondent denies each and every allegation of
19 paragraph 77.

20 78. The statement in paragraph 78 is a conclusion of law and therefore does not require a
21 response. To the extent a response is required, Respondent denies each and every allegation of
22 paragraph 78.

23 79. Respondent denies the allegations in paragraph 79.

24 80. To the extent the allegations in paragraph 80 purport to summarize, quote from, or
25 refer to Petitioner's Exhibit 1 regarding correspondence that occurred on January 24, 2025,
26 Respondent refers the Court to Petitioner's Exhibit 1 for a full and complete statement of its
27 contents. To the extent a response is required, Respondent denies each and every allegation of
28 paragraph 80.

1 81. To the extent the allegations in paragraph 81 purport to summarize, quote from, or
2 refer to Petitioner’s Exhibit 2 regarding correspondence that occurred on January 24, 2025,
3 Respondent refers the Court to Petitioner’s Exhibit 2 for a full and complete statement of its
4 contents. To the extent a response is required, Respondent denies each and every allegation of
5 paragraph 81.

6 82. To the extent paragraph 82 purports to summarize, quote from, or refer to the text of
7 Government Code section 7922.535, subdivision (a), Respondent refers the Court to the statute
8 for a full and complete statement of its contents. Paragraph 82 further contains legal argument
9 and conclusions to which no response is required. To the extent the allegations in paragraph 82
10 purport to summarize, quote from, or refer to the contents of CDFA’s response to CRLA’s
11 Request sent on January 24, 2025, Respondent refers the Court to Petitioner’s Exhibit 2 for a full
12 and complete statement of its contents. To the extent a response is required, Respondent denies
13 each and every allegation of paragraph 82.

14 83. To the extent the allegations in paragraph 83 purport to summarize, quote from, or
15 refer to Petitioner’s Exhibits 6–11 regarding correspondence that occurred on February 24, 2025,
16 and March 12, 13, and 17, 2025, Respondent refers the Court to Exhibits 6–11 for a full and
17 complete statement of their contents. To the extent a response is required, Respondent denies
18 each and every allegation of paragraph 83.

19 84. Respondent admits that CDFA maintains a list of outbreak locations to effectively
20 coordinate regulatory food safety inspection work. To the extent the remaining allegations in
21 paragraph 84 purport to summarize, quote from, or refer to Petitioner’s Exhibit 29 regarding
22 correspondence that occurred on July 2, 2025, Respondent refers the Court to Exhibit 29 for a full
23 and complete statement of its contents. As to the remaining allegations, Respondent lacks
24 sufficient knowledge or information to admit or deny the remaining allegations, and on that basis
25 denies each and every allegation in paragraph 84.

26 85. To the extent the allegations in paragraph 85 purport to summarize, quote from, or
27 refer to Petitioner’s Exhibits 15 and 18 regarding correspondence that occurred on March 28,
28 2025, and May 2, 2025, Respondent refers the Court to Exhibits 15 and 18 for a full and complete

1 statement of their contents. To the extent the allegations in paragraph 85 purport to summarize,
2 quote from, or refer to Petitioner’s Exhibits 16, 26, and 29 regarding correspondence that
3 occurred on April 2, July 1, and July 10, 2025, Respondent refers the Court to Exhibits 16, 26,
4 and 29 for a full and complete statement of their contents. As to the remaining factual allegations
5 in paragraph 85, Respondent admits only that the produced documents speak for themselves, and
6 on that basis, no further response is required. The remaining statements in paragraph 85 are
7 conclusions of law, do not aver facts, and therefore do not require a response. To the extent a
8 response is required, the remaining allegations in paragraph 85 are denied.

9 86. Respondent denies the allegations contained in paragraph 86,

10 87. Respondent denies the allegations contained in paragraph 87.

11 88. Respondent denies the allegations contained in paragraph 88.

12 89. Respondent denies the allegations contained in paragraph 89.

13 90. Respondent denies the allegations contained in paragraph 90.

14 91. To the extent the allegations in paragraph 91 purport to summarize, quote from, or
15 refer to the contents of CDFA’s response to CRLA’s Request sent on January 24, 2025,
16 Respondent refers the Court to Petitioner’s Exhibit 2 for a full and complete statement of its
17 contents. To the extent a response is required, Respondent denies each and every allegation of
18 paragraph 91. The remaining statements in paragraph 91 are conclusions of law, do not aver facts,
19 and therefore do not require a response.

20 92. Respondent admits that it released a total of 2,111 pages of records to CRLA between
21 May and August 2025. To the extent the remaining allegations in paragraph 92 purport to
22 summarize, quote from, or refer to Petitioner’s Exhibits 15 regarding correspondence that
23 occurred on March 28, 2025, Respondent refers the Court to Exhibit 15 for a full and complete
24 statement of its contents. The remaining statements in paragraph 92 are conclusions of law, do not
25 aver facts, and therefore do not require a response. To the extent a response is required,
26 Respondent denies each and every in paragraph 92 that is not specifically admitted.

27 93. To the extent the allegations in paragraph 93 purport to summarize quote from or
28 refer to Petitioner’s Exhibit 20 regarding correspondence that occurred on May 22, 2025, about

1 redactions, Respondent refers the Court to Exhibit 20 for a full and complete statement of its
2 contents. The remaining statements in paragraph 93 are conclusions of law, do not aver facts, and
3 therefore do not require a response. To the extent that a response is required, Respondent denies
4 each and every allegation in paragraph 93.

5 94. To the extent the allegations in paragraph 94 purport to summarize, quote from, or
6 refer to Government Code sections 7927.400 and 11015.5, Respondent refers the Court to the
7 statute for a full and complete statement of its contents. The remaining statements in paragraph 94
8 are conclusions of law, do not aver facts, and therefore do not require a response. To the extent a
9 response is required, Respondent denies each and every allegation in paragraph 94.

10 95. To the extent the allegations in paragraph 95 purport to summarize, quote from, or
11 refer to Government Code section 7927.700, Respondent refers the Court to the statute for a full
12 and complete statement of its contents. The remaining statements in paragraph 95 are conclusions
13 of law, do not aver facts, and therefore do not require a response. To the extent a response is
14 required, Respondent denies each and every allegation in paragraph 95.

15 96. Respondent denies the allegations contained in paragraph 96.

16 97. To the extent the allegations in paragraph 97 purport to summarize, quote from, or
17 refer to other documents, Respondent refers the Court to those documents for a full and complete
18 statement of their contents. To the extent a response is required, Respondent denies each and
19 every allegation in paragraph 97.

20 98. Respondent denies the allegations contained in paragraph 98.

21 99. To the extent the allegations in paragraph 99 purport to summarize, quote from, or
22 refer to other documents, Respondent refers the Court to those documents for a full and complete
23 statement of their contents. To the extent a response is required, Respondent denies each and
24 every allegation in paragraph 99.

25 100. Respondent denies the allegations contained in paragraph 100.

26 101. Respondent denies the allegations contained in paragraph 101.

27 102. Respondent denies the allegations contained in paragraph 102.

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1 properly exercised the discretion vested with them in redacting Petitioner's records, and
2 therefore acted in compliance with all law and regulations and did not abuse its discretion.

3 **FOURTH AFFIRMATIVE DEFENSE**

4 **(Unclean Hands)**

5 4. Petitioner's claims are barred, in whole or in part, by the doctrine of unclean hands.

6 **FIFTH AFFIRMATIVE DEFENSE**

7 **(Estoppel)**

8 5. Petitioner's claims are barred, in whole or in part, under the doctrine of estoppel.

9 **SIXTH AFFIRMATIVE DEFENSE**

10 **(Mootness)**

11 6. Petitioner's claims, in whole or in part, are moot.

12 **SEVENTH AFFIRMATIVE DEFENSE**

13 **(Standing)**

14 7. Petitioner lacks standing to enforce the claims raise and pursue the relief demanded in
15 this action.

16 **EIGHTH AFFIRMATIVE DEFENSE**

17 **(Failure to Exhaust Administrative Remedies)**

18 8. Petitioner's claims are barred, in whole or in part, because Petitioner failed to exhaust
19 administrative remedies.

20 **NINTH AFFIRMATIVE DEFENSE**

21 **(No Attorneys' Fees)**

22 9. Petitioner is not entitled to costs or fees related to bring or litigate this matter,
23 including fees under Government Code section 800, and Code of Civil Procedure section
24 1021.5.

25 **TENTH AFFIRMATIVE DEFENSE**

26 **(Statute of Limitations)**

27 10. Petitioner's claims are barred, in whole or in part, by the statute of limitations,
28 including, but not limited to, California Code of Civil Procedure section 343.

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ELEVENTH AFFIRMATIVE DEFENSE

(Right to Additional Affirmative Defenses)

11. Respondent reserves the right to assert additional affirmative defenses, if applicable, if and when, additional facts become known.

PRAYER FOR RELIEF

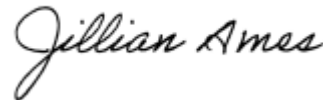
WHEREFORE, Respondent prays for relief as follows:

1. The Court deny the Petition for Writ of Mandate entirely;
2. The Court deny any requests for attorneys’ fees and costs against Respondent;
3. The Court enter a judgement in favor of Respondent;
4. The Court award Respondent’s costs expended, and attorneys’ fees incurred in this action; and
5. The Court grant Respondent such other relief as it deems just and proper.

Dated: December 22, 2025

Respectfully submitted,

ROB BONTA
Attorney General of California
SIERRA S. ARBALLO
Supervising Deputy Attorney General



JILLIAN E. AMES
Deputy Attorney General
Attorneys for Respondent
California Department of Food and
Agriculture

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DECLARATION OF SERVICE BY E-MAIL

Case Name: California Rural Legal Assistance, Inc. v. CA. Dept. of Food and Agriculture
Case Number: 25CV026236
Party Represented: CA. Dept. of Food and Agriculture

Declaration of Electronic Service

1. I am at least 18 years of age and not a party to this matter.
2. I am employed in the Office of the Attorney General of the State of California. My business address is 1300 I Street, Suite 125, Sacramento, CA 95814, County of Sacramento.
3. My electronic service address is Antinia.Brown@doj.ca.gov.
4. On December 22, 2025, I electronically served the following document[s]:

RESPONDENT CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE'S ANSWER TO CALIFORNIA RURAL LEGAL ASSISTANCE, INC.'S VERIFIED PETITION FOR WRIT OF MANDATE AND DECLARATORY AND INJUNCTIVE RELIEF

5. I electronically served the aforementioned document[s] by emailing them to the following individual[s]:

David P. Cremins
Amelia D. Haney
Anali Cortez Bulosan
Michael L. Meuter
Mariah C. Thompson
Abigail Gonzalez
Anabel Raya
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David Loy
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FIRST AMENDMENT COALITION
dloy@firstamendmentcoalition.org
afield@firstamendmentcoalition.org
Attorneys for Petitioner California Rural Legal Assistance, Inc.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed on December 22, 2025.

Antinia Brown

Declarant



Signature

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39535301