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13
14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **COUNTY OF SAN DIEGO**

16
17 KATHLEEN MORRISSEY,
18
19 Petitioner/Plaintiff,
20 v.
21 CITY OF SAN DIEGO,
22 Respondent/Defendant.

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.*]

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25
26 Petitioner and Plaintiff KATHLEEN MORRISSEY (“Petitioner”), an individual and
27 journalist residing and working in the County of San Diego, California, petitions the Court,
28 through this Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive

1 Relief under the California Constitution and California Public Records Act (“Petition”), to
2 command Respondent and Defendant CITY OF SAN DIEGO (the “City”) to comply with the
3 California Constitution, Article I, section 3(b), and the California Public Records Act (“CPRA”),
4 California Government Code § 7920.000, *et seq.*; to declare that Respondent has failed to do so;
5 and to enjoin Respondent from continuing to violate the law by unlawfully withholding public
6 records requested by Petitioner.

7 I. INTRODUCTION

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

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

15 3. On July 21, 2025, Petitioner, via Respondent’s on-line “NextRequest” system,
16 requested specific public records from Respondent pertaining to the San Diego Police
17 Department’s (hereafter, “SDPD”) and its officers’ involvement in enforcement activities
18 conducted by Immigration and Customs Enforcement (hereafter, “ICE”) and other federal agents
19 at the Mesa Vista apartments in the Linda Vista neighborhood of San Diego on **July 2, 2025**
20 (hereafter, “**Linda Vista Request**”). A true and correct copy of the Linda Vista Request, as
21 recorded in Respondent’s NextRequest system, is attached as **Exhibit A**.

22 4. On August 28, 2025, Respondent, in response to the Linda Vista Request,
23 released certain public records, containing redactions, and asserted Gov. Code §§ 7923.600,
24 7922.000, 7923.615, and *Haynie v. Superior Court*, 26 Cal. 4th 1061 (2001), as the basis for
25 those redactions and for withholding otherwise responsive public records. A true and correct
26 copy of Respondent’s August 28, 2025, response is also set forth in **Exhibit A**.

27 5. On December 9, 2025, Petitioner, via the NextRequest system, requested specific
28 public records from Respondent pertaining to the SDPD’s and its officers’ involvement in

1 enforcement activities conducted by ICE and other federal agents at the 47th Street Trolley
2 Station in San Diego on **November 18, 2025** (hereafter, “**47th Street Request**”). A true and
3 correct copy of the 47th Street Request, as recorded in the NextRequest system, is attached as
4 **Exhibit B.**

5 6. On December 11, 2025, Respondent, in response to the 47th Street Request, did
6 not release any public records, and asserted Gov. Code §§ 7923.600, 7923.615, 7922.000, and
7 7927.705, Evid. Code § 1043, and *Haynie v. Superior Court*, 26 Cal. 4th 1061 (2001), as the
8 basis for withholding “[a]ny documents responsive to the request.” A true and correct copy of
9 Respondent’s December 11, 2025, response is also set forth in **Exhibit B.**

10 7. On information and belief, undersigned co-counsel David Loy sent Respondent a
11 letter on January 7, 2026, explaining why Respondent’s responses to the Linda Vista Request
12 and the 47th Street Request (together, “Requests”) violated the CPRA and asking Respondent to
13 produce all records responsive to the Requests. A true and correct copy of the January 7, 2026,
14 letter (hereafter, “FAC Letter”) is attached as **Exhibit C.**

15 8. On information and belief, Respondent sent undersigned co-counsel David Loy a
16 letter on January 22, 2026, confirming receipt of the FAC Letter, indicating that certain
17 additional public records would be produced in response to the Requests by January 23, 2026,
18 and otherwise maintaining the exemptions to disclosure previously asserted by Respondent. A
19 true and correct copy of the January 22, 2026, letter (hereafter, “City Letter”) is attached as
20 **Exhibit D.**

21 9. On January 23, 2026, as outlined in the City Letter, certain additional records
22 were disclosed to Petitioner via the NextRequest System in response to the Requests.
23 Respondent’s NextRequest system indicates that the Requests are now closed.

24 10. Respondent has violated Cal. Const. Art. I, § 3(b), and the CPRA by a) asserting
25 legally erroneous exemptions from disclosure in redacting and withholding public records
26 otherwise responsive to the Requests; and b) failing to disclose all public records sought by the
27 Requests.

28 //

1 **II. PARTIES**

2 11. Petitioner KATHLEEN MORRISSEY is a resident of the County of San Diego
3 and a journalist who is known professionally as Kate Morrissey. Petitioner was, for seven years,
4 a journalist at the San Diego Union Tribune, a well-known regional newspaper. Petitioner is
5 currently a co-founder and principal journalist at Daylight San Diego, a nonprofit and
6 nonpartisan newsroom that focuses on communities historically overlooked, underrepresented,
7 or misrepresented in mainstream media. Petitioner has covered immigration, with a focus on the
8 San Diego-Tijuana border area, since 2016, and is known nationally for her work on the U.S.
9 asylum system and border policies. In 2020, Petitioner published “Returned,” an award-winning,
10 four-part series investigating the U.S. asylum system. In recognition of her professional
11 achievements and skill, Petitioner was recently awarded a scholarship to attend City University
12 of New York's Entrepreneurial Journalism Creators Program. By reporting on the immigration
13 enforcement activities discussed below and by bringing this lawsuit, Petitioner seeks to serve her
14 readers and the public interest by documenting, reporting on, and bringing transparency to the
15 enforcement activities of federal immigration agents, their agencies, and the role of local law
16 enforcement actors in the same.

17 12. Petitioner is a “person” within the meaning of Gov. Code § 7920.520 (“‘person’
18 includes any natural person”) and thus a “member of the public” within the meaning of Gov.
19 Code § 7920.515. Given her status as a nonprofit professional journalist with a specific public
20 interest focus on federal immigration enforcement, the role of local law enforcement in the same,
21 and the impact of such enforcement on local underrepresented communities, Petitioner is
22 beneficially interested in the outcome of these proceedings. Petitioner has a clear, present, and
23 substantial right to the relief sought herein and no plain, speedy, and adequate remedy at law
24 other than that sought herein.

25 13. Respondent CITY OF SAN DIEGO (the “City”) is a “local agency” within the
26 meaning of Gov. Code § 7920.510(b), is in the County of San Diego, and is in possession of the
27 public records sought by Petitioner.

28 //

1 See Kate Morrissey, *Citizens arrested while documenting ICE activity freed after night in port of*
2 *entry cells*, Daylight San Diego, July 4, 2025.¹

3 18. On information and belief, around noon the same day, federal agents involved in
4 these enforcement activities called 9-1-1 and requested assistance from the SDPD.

5
6 19. Later that day, Petitioner contacted via email Lt. Travis Easter, an SDPD Public
7 Information Officer. In back-and-forth emails over July 2, July 3, and July 16, and in response to
8 Petitioner's questions regarding the events of July 2, Lt. Easter stated, in relevant parts:

9 [July 2] Our officers responded to a 911 call at approximately noon today (July 2, 2025)
10 regarding an urgent request for cover from Homeland Security Agents working on 7900
11 Linda Vista Road, San Diego, CA 92111. Upon arrival, officers, accompanied by a
12 supervisor, **maintained the peace and safety of all on scene** as HSI agents completed
13 their objective and departed the area (**emphasis added**).

14 [July 2] Homeland Security Investigations (HSI) is a federal law enforcement agency
15 with its own policies and procedures concerning the use of force. We will not provide a
16 comment about their use of force during this incident. Please contact HSI for further
17 questions pertaining to it.

18 [July 2] The San Diego Police Department abides by Senate Bill 54 and has specific
19 language in our Department procedure, which I have attached from our public website,
20 that outlines what we are allowed and not allowed to do concerning adult undocumented
21 persons. Our officers can provide emergency assistance as we would for all law
22 enforcement agencies to protect public safety [**emphasis in original**]. Our officers' focus
23 is on detecting and apprehending individuals involved in criminal activity. **We are not**
24 **looking for violations of immigration laws** (**emphasis added**).

25 [July 3] The HSI agents requested for emergency assistance while they were at the
26 location. When an agency calls for emergency assistance, we do not assess to determine
27 whether their request was valid or not. If an officer or anyone requests emergency
28 assistance, our priority is the preservation of life and to get there as quickly and safely as
possible. It is not for us to determine the validity of one's request if they are asking for
emergency assistance. Seven officers and one sergeant responded to their request for
emergency assistance.

[July 16] Concerning the Linda Vista incident: [w]e did not put up the police tape during
that incident. It was already up when our officers arrived. We received two 911 calls for
that incident. You will have to speak with HSI concerning the movement of the tape and
why they called for emergency assistance.

¹ Available at <https://www.daylightsandiego.org/citizens-arrested-while-documenting-ice-activity-san-diego/>

1 20. A true and correct copy of the July 2, July 3, and July 16, 2025, email exchange
2 between Petitioner and Lt. Easter is attached as **Exhibit E**.

3 21. On July 21, 2025, Petitioner made the Linda Vista Request for the following
4 public records:

5
6 I am requesting the 911 call logs and transcripts for two calls regarding ICE HSI and
7 other federal agents' activity at the Mesa Vista apartments in Linda Vista on July 2.
8 SDPD said it received two calls about the situation and sent eight officers, including a
9 sergeant. I would like to request the body camera footage of the SDPD officers who
10 responded to the apartments during the ICE operation. I would also like to request any
11 reports, emails or other documents made by SDPD related to the incident. I request to
12 receive this information electronically and in an expedited manner given that I am a
13 member of the media, and this request is for service to the public.

14 22. According to SDPD Procedure, published on Respondent's website, SDPD
15 officers generally "are required to wear and use their BWC [body-worn camera] while working
16 in any uniformed assignment."²

17 23. On August 28, 2025, in response to the Linda Vista Request, the City disclosed
18 "E25070001766_Redacted.pdf" and "E25070002224_Redacted.pdf," documents entitled "Call
19 For Service," with redactions, and dated July 2, 2025. A true and correct copy of these public
20 records is attached as **Exhibit F**. Upon disclosing these public records, the City stated, "[a]ll
21 responsive documents have been released except those that have been redacted and/or withheld
22 pursuant to" Gov. Code §§ 7923.600, 7922.000, 7923.615, and *Haynie v. Superior Court*, 26
23 Cal. 4th 1061 (2001).

24 **B. 47th Street Request and City's Initial Response**

25 24. On information and belief, federal agents, including ICE, were present at and
26 around the 47th Street trolley station in San Diego on November 18, 2025. Arturo González, a
27 community activist, identified a presumed federal agent and began filming that agent.

28 ² SDPD Procedure, 1.49 – Administration, Axon Body Worn Cameras, effective as of September 2, 2021, at p. 3,
Section V.D.2., available at <https://www.sandiego.gov/sites/default/files/149-axonbodyworncameras.pdf>

1 Subsequently, additional community members, alerted to the presence of federal agents, arrived
2 to witness, document and record, and in some cases protest, the presence and activities of the
3 federal agents. Shortly afterwards, additional federal agents arrived and questioned, detained,
4 and used force against community members, including with pepper spray and direct physical
5 force. Around noon, SDPD officers arrived and separated community members from federal
6 agents. While doing so, SDPD officers arrested one man who was alleged to have struck a
7 federal agent and then transferred that man to federal agents for potential federal criminal
8 charges. One community member, Adan Morales Rubio, was injured by federal agents that day.
9 SDPD officers took pictures of Rubio's injuries, wrote down his name, and said to expect a call
10 back, but did not give him a case number. Regarding his experience, Rubio stated:
11

12 I really lost my trust in the police department...[f]or the community, they were useless.
13 They didn't protect our community, they were protecting the ICE agents.

14 See Roberto Camacho, *How a TikTok's ICE patrol spiraled into a violent confrontation*
15 *at a trolley stop*, Times of San Diego, December 3, 2025³.

16 25. On December 9, 2025, Petitioner made the 47th Street Request for the following
17 public records:

18 I am requesting the 911 call logs and transcripts on November 18, 2025, regarding ICE
19 HSI and other federal agents' activity at the 47th Street Trolley Station. I believe calls
20 related to this incident would have come in between 10am and noon. I would like to
21 request the body camera footage of the SDPD officers who responded to the situation. I
22 would also like to request any reports, emails or other documents made by SDPD related
23 to the incident, including but not limited to communications with the contact for such
24 incidents at the mayor's office. I request to receive this information electronically and in
25 an expedited manner given that I am a member of the media, and this request is for
26 public service.

27 26. On December 11, 2025, in response to the 47th Street Request, Respondent did
28 not release any public records and stated that "[a]ny documents responsive to the request are
being withheld pursuant to" Gov. Code §§ 7923.600, 7923.615, *Haynie v. Superior Court*, 26

³ Available at <https://timesofsandiego.com/politics/2025/12/03/how-tiktokers-ice-patrol-spiraled-into-violent-confrontation/>

1 Cal. 4th 1061 (2001), 7922.000, 7927.705, and Evid. Code § 1043.

2 **C. FAC Letter and Respondent’s Final Disclosures**

3 27. On information and belief, undersigned co-counsel David Loy explained to
4 Respondent in the FAC Letter why its responses to the Requests violated the CPRA and asked
5 that Respondent produce all records responsive to the Requests.

6 28. On information and belief, via the City Letter, Respondent indicated, upon
7 “further review,” that additional public records would be produced in response to the Requests
8 by January 23, 2026. Respondent also specifically denied possession of 911 transcripts related to
9 the Requests. *Id.* Respondent otherwise “maintain[ed] the exemptions to disclosure” previously
10 asserted by Respondent. *Id.*

11 29. On January 23, 2026, Respondent disclosed additional public records in
12 connection with the Linda Vista Request, “SDPD Emails.pdf,” a set of July 2025 emails with
13 redactions. A true and correct copy of the “SDPD Emails.pdf” is attached as **Exhibit G**.

14 30. On the same day, Respondent disclosed additional public records in connection
15 with the 47th Street Request, “SDPD Responsive Records.pdf.” A true and correct copy of the
16 “SDPD Responsive Records.pdf” is attached as **Exhibit H**. The SDPD Responsive Records
17 consist of:

- 18 a) “Call For Service” records, with redactions, dated November 18, 2025;
19 b) what appears to be a screenshot of a text message dated “Tue, Nov 18 at 2:08pm,”
20 with unknown sender(s) and recipient(s), and which appears to describe the SDPD’s role
21 in the events of November 18, 2025, at the 47th Street Trolley Station, including that an
22 unknown number of SDPD officers “responded” to those events at “about 11:08 am” and
23 **“helped separate the protestors from the agents” (emphasis added)**; and
24 c) a December 9, 2025, email from Denise Martinez, SDPD Community Relations
25 Officer, responding to a December 4, 2025, email from a person described as a “Resident
26 of San Diego” [the “From” field is redacted] who expressed sharp concern about the
27 “ICE abduction of a resident at the 47th St Trolley Station,” also noting that:

28 As you no doubt know, the majority of San Diegans do not support brutality or illegal

1 abductions of our residents. I might also add that if SDPD is to remain reputable and
2 trusted in the eyes of it's residents, it needs to prove that Trust by at the very least, by not
3 aiding and abetting these federal thugs.

4 *Id.*

5 31. Apart from those described above, Respondent has not disclosed any additional
6 public records – including any requested body-worn camera footage – in response to the
7 Requests.

8 **D. Local, State, and National Public Interest**

9 32. On information and belief, immigration raids and immigration enforcement
10 activities carried out by ICE and other federal agents – and the impact of those raids on
11 communities – are a matter of powerful local, state, and national public interest. The local
12 interest is demonstrated by the facts set forth above in which residents of San Diego, some of
13 whom have been arrested, pepper-sprayed, and subjected to physical force by federal
14 immigration agents, have expressed frustration and outrage, and who have questioned the role of
15 their own local police – the SDPD – in the same.

16 33. On information and belief, the public interest in these matters is statewide as well.
17 Governor Gavin Newsom, for example, has denounced federal immigration enforcement
18 activities occurring across California, characterizing such activities as part and parcel of a
19 “military dragnet” that has made use of “tear gas...[f]lash bang grenades...[r]ubber bullets” to
20 undermine democracy in California and nationwide.⁴ Moreover, the California Legislature has
21 passed several state laws that explicitly limit local and state law enforcement involvement with
22 federal immigration enforcement, including the California TRUTH Act (AB 2792) at Gov. Code
23 §§ 7283 *et seq.*; the California TRUST Act (AB 4) at Gov. Code §§ 7282, 7282.5; the California
24 Values Act (SB54) at Gov. Code §§ 7284 *et seq.*; and the California SAFE Act (SB 98)
25 (amending, in part, California Educ. Code §§ 32282 and 66093.3, and requiring public schools to
26

27 ⁴ See Gavin Newsom, *Governor Newsom's Address to California: Democracy at a Crossroads*, June 10, 2025,
28 available at <https://www.gov.ca.gov/2025/06/10/governor-newsoms-address-to-california-democracy-at-a-crossroads/>

1 notify school communities of immigration enforcement presence on campus and to assist
2 students impacted by federal immigration agents).

3 34. On information and belief, the public interest in these matters extends nationwide
4 as well. There is broad national news media coverage of similar enforcement actions occurring
5 in California and all over the country – including on what the role of local and state law
6 enforcement should be in such immigration enforcement activities. *See, e.g.,* Steven W.
7 Thrasher, *What ICE’s Assault on Ventura County, California Means for the Rest of America*,
8 Literary Hub, July 21, 2025⁵; *Protests against immigration raids continue to spread across the*
9 *U.S. Here’s a look at many of them*, CBS News, June 12, 2025⁶; William Brangham and Ryan
10 Connelly Holmes, *ICE escalates aggressive raids in Chicago as Trump moves to deploy*
11 *National Guard*, PBS, October 9, 2025⁷; Christopher Weber, *What to know about the protests*
12 *over Trump’s immigration crackdown in LA and other cities*, AP News, June 13, 2025⁸; Jack
13 Healy, *An Altercation With ICE Prompts a Police Chief to Push Back*, New York Times,
14 November 3, 2025⁹; Ryan J. Reilly and Natasha Korecki, *DOJ indicts Democratic congressional*
15 *candidate Kat Abughazaleh over ICE protests*, NBC News, October 29, 2025¹⁰; Luis Ferré-
16 Sadurní, Wesley Parnell, and Samantha Latson, *11 N.Y. Officials Arrested Trying to Access ICE*
17 *Detention Cells*, New York Times, September 18, 2025¹¹.

18 **E. Respondent’s Violations**

19 35. Respondent has violated Cal. Const. Art. I, § 3(b), and the CPRA by a) asserting
20 legally erroneous exemptions from disclosure in redacting and withholding public records
21 otherwise responsive to the Requests; and b) failing to disclose all public records sought by the
22 Requests.

23 ⁵ Available at <https://lithub.com/what-ices-assault-on-ventura-county-california-means-for-the-rest-of-america/>.

24 ⁶ Available at <https://www.cbsnews.com/news/protests-immigration-raids-spread-across-us-a-look-at-many-sporadic-violence/>.

25 ⁷ Available at <https://www.pbs.org/newshour/show/ice-escalates-aggressive-raids-in-chicago-as-trump-moves-to-deploy-national-guard>.

26 ⁸ Available at <https://apnews.com/article/insurrection-act-trump-troops-newsom-military-national-guard-a842f79e1c0e244039be274a6f266a7a>.

27 ⁹ Available at <https://www.nytimes.com/2025/11/03/us/politics/durango-colorado-ice-protester.html>.

28 ¹⁰ Available at <https://www.nbcnews.com/politics/justice-department/doj-indicts-democratic-congressional-candidate-kat-abughazaleh-ice-pro-rcna240584>.

¹¹ Available at <https://www.nytimes.com/2025/09/18/nyregion/elected-officials-arrested-ice-new-york.html>.

1 42. An agency that withholds public records bears the burden to show that such
2 withholding is justified by an exemption listed in the CPRA. Gov. Code § 7922.000.

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

5 44. The CPRA’s exemption for records of “investigations conducted by ... any state
6 or local police agency,” Gov. Code § 7923.600, covers only those records generated “as part of a
7 targeted inquiry into any particular crime or crimes.” *American Civil Liberties Union
8 Foundation of Southern California v. Superior Court*, 3 Cal. 5th 1032, 1042 (2017) (“*ACLU*”).
9 It does not “shield everything law enforcement officers do from disclosure.” *Castañares v.
10 Superior Court*, 98 Cal. App. 5th 295, 307 (2023) (quoting *Haynie v. Superior Court*, 26 Cal. 4th
11 1061, 1071 (2001)). An agency cannot “avoid disclosure under the CPRA simply by labeling
12 certain information ‘investigatory.’” *Id.* at 306 n.7. *See also Register Div. of Freedom
13 Newspapers, Inc. v. County of Orange*, 158 Cal. App. 3d 893, 903-04 (1984) (rejecting
14 respondent’s claimed exemption under §§ 7923.600 *et seq.*’s predecessor statute for written
15 report of Sheriff’s investigation into inmate’s injury where Sheriff’s investigation was not
16 undertaken for law enforcement purposes, but to determine validity of harmed inmate’s tort
17 liability and insurance claim).

18 45. Further, even if certain records are exempt or partially exempt from disclosure
19 under Gov. Code § 7923.600, the CPRA requires a public agency to disclose “the time,
20 substance, and location of all complaints or requests for assistance received by the agency and
21 the time and nature of the response thereto, including, to the extent the information regarding
22 crimes alleged or committed or any other incident investigated is recorded: (A) The time, date,
23 and location of occurrence; (B) The time and date of the report; (C) The name and age of the
24 victim; (D) The factual circumstances surrounding the crime or incident; and (E) A general
25 description of any injuries, property, or weapons involved.” Gov. Code § 7923.615(a); *see also*
26 *Fredericks v. Superior Court*, 233 Cal. App. 4th 209, 224-25 (2015) (noting same requirements
27 under § 7923.615(a)’s predecessor statute).
28

1 46. Further, to the extent records depict or relate to incidents or events covered by
2 Penal Code § 832.7(b) or Gov. Code § 7923.625 – for example, because they relate to use of
3 force resulting in great bodily injury – such records may be subject to disclosure regardless of
4 whether they might otherwise qualify as investigatory records under Gov. Code § 7923.600.

5 47. Under CPRA § 7927.705, Penal Code § 832.7(a), and Evid. Code § 1043, peace
6 officer “personnel records” may be exempt from disclosure in some circumstances. This
7 exemption, however, is subject to explicit limitations. First, records of a law enforcement action,
8 response, or incident itself – such as call logs, incident reports, or body camera video footage, as
9 opposed to records of any subsequent internal affairs investigation of specific officers – are not
10 peace officer personnel records within the meaning of the exemption. *See Long Beach Police*
11 *Officers Ass’n. v. City of Long Beach*, 59 Cal. 4th 59, 71 (2014) (noting “many records routinely
12 maintained by law enforcement agencies are not personnel records. For example, the information
13 contained in the initial incident reports of an on-duty shooting are typically not ‘personnel
14 records’ as that term is defined in Penal Code section 832.8”). In the same way, call logs,
15 incident reports, and body camera video footage – as sought by the Requests here – of an
16 incident itself are not “personnel records.” *Id.* Second, reports to another department within a
17 public agency – for example, a report from SDPD made pursuant to the Mayor of San Diego’s
18 Executive Order No. 2025-1¹² – are not “personnel records” within the meaning of the
19 exemption. Third, even if some of the requested records might otherwise qualify as “personnel
20 records,” Pen. Code § 832.7(b) requires the disclosure of peace officer personnel records under
21 enumerated circumstances, including records related to a peace officer’s discharge of a firearm,
22 use of force resulting in death or great bodily injury, and records of sustained findings of various
23 forms of misconduct.

24 48. The CPRA’s “catchall” exemption allows an agency to withhold records only if it
25 can prove “on the facts of the particular case the public interest served by not disclosing the

26 ¹² The Mayor of the City of San Diego Executive Order 2025-1 (July 23, 2025) requires, *inter alia*, that the SDPD
27 “[d]esignate a departmental liaison to the Mayor’s Office to report any instance where San Diego Police Department
28 officers responded to an incident involving a federal agency conducting immigration enforcement activity in the
City of San Diego.” Available at <https://www.sandiego.gov/sites/default/files/2025-07/mayor-eo-2025-1.pdf?ref=daylightsandiego.org>

1 record clearly outweighs the public interest served by disclosure of the record.” Gov. Code
2 § 7922.000. This “provision contemplates a case-by-case balancing process, with the burden of
3 proof on the proponent of nondisclosure to demonstrate a clear overbalance on the side of
4 confidentiality.” *ACLU*, 3 Cal. 5th at 1043. To prevent the catchall exemption from becoming “a
5 loophole used to improperly keep public records from the people,” courts must apply it sparingly
6 and narrowly, remaining “alert to contentions by government entities that exaggerate the interest
7 in nondisclosure, lest they be used as a pretext for keeping information secret for improper
8 reasons, such as to avoid embarrassment over mistakes, incompetence, or wrongdoing.” *Los*
9 *Angeles Unified School Dist. v. Superior Court*, 228 Cal. App. 4th 222, 250 (2014).

10 49. Even where part of a public record is properly exempt from disclosure, the public
11 agency must provide the portions of such a record that are reasonably segregable. Gov. Code §
12 7922.525.

13 50. When a public agency withholds a public record without justification, the court
14 must order disclosure of the record. Gov. Code § 7923.110(a) (if “the public official’s decision
15 to refuse disclosure is not justified...the court shall order the public official to make the record
16 public.”); Gov. Code § 7923.100 (“Whenever...certain public records are being improperly
17 withheld...the court shall order the officer or other person charged with withholding the records
18 to disclose those records...”).

19 VI. CAUSE OF ACTION

20 (Unlawful Refusal to Disclose Public Records)

21 51. Petitioner realleges and incorporates by this reference Paragraphs 1 through 50 of
22 this Petition as though set forth here in full.

23 52. The Requests describe “public records” as defined by the CPRA.

24 53. The Requests describe public records that are subject to disclosure under the
25 California Constitution and CPRA.

26 54. Respondent has violated Cal. Const. Art. I, § 3(b) and the CPRA by:
27
28

1 a. asserting legally erroneous exemptions from disclosure where Respondent cannot
2 meet its burden to show that the records sought by the Requests qualify for any
3 redaction or exemption from disclosure;

4 b. failing to disclose the complete public records sought in the Requests, including,
5 but not limited to, disclosures required by Gov. Code §§ 7923.615 and 7923.625;

6 55. Accordingly, an actual controversy exists as to whether the public records
7 requested by Petitioner must be disclosed by Respondent, and whether those records, or any part
8 thereof, are exempt from disclosure.

9 56. Petitioner has no plain, speedy, and adequate remedy to obtain the public records
10 requested, other than this Petition. Petitioner is entitled to institute proceedings for a writ of
11 mandate to enforce Petitioner's rights and the public's rights to obtain records responsive to the
12 Requests.

13 57. Furthermore, Petitioner is entitled to have the proceedings resolved on an
14 expedited basis consistent "with the object of securing a decision to these matters at the earliest
15 possible time." Gov. Code § 7923.005.

16 **VII. PRAYER FOR RELIEF**

17 Wherefore, Petitioner prays as follows:

18 1. Issue a writ of mandate ordering Respondent to perform as required by the Cal.
19 Const. Art. I, § 3(b) and the CPRA and preventing Respondent from violating the same,
20 including by:

21 a. Requiring Respondent to immediately disclose all records responsive to the
22 Requests, including (but not limited to) those disclosures required under Gov. Code §§
23 7923.615 and 7923.625, except to the extent that Respondent meets its burden to prove
24 that responsive records are subject to statutory exemption;

25 2. Issue a declaration that Respondent has violated and continues to violate Cal.
26 Const. Art. I, § 3(b) and the CPRA;

1 3. Enjoin Respondent to provide the records sought by the Requests and otherwise
2 to comply with Cal. Const. Art. I, § 3(b) and the CPRA with respect to the records sought by the
3 Requests;

4 4. Alternatively, if the Court does not immediately issue the relief set forth above
5 and order Respondent to produce the records sought by the Requests, that the Court order
6 Respondent to show cause why the records sought by the Requests should not be released and
7 the requested relief should not be awarded, and order Respondent to prepare a log of withheld
8 records, and that the Court thereafter grant the requested relief and order that the records sought
9 by the Requests be disclosed;

10 5. Alternatively, if the Court does not immediately issue the relief set forth above
11 and order disclosure of the records sought by the Requests, that the Court conduct an *in camera*
12 review, if it deems it necessary, of some or all of the records sought by the Requests pursuant to
13 Gov. Code § 7923.105(a), and that the Court thereafter grant the requested relief and order that
14 the records sought by the Requests be disclosed;

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

17 7. Order Respondent to pay Petitioner's reasonable attorneys' fees and costs
18 pursuant to Gov. Code § 7923.115, CCP § 1021.5, and any other applicable law;

19 8. For judgment accordingly;

20 9. For such other and further relief as the Court may deem just and proper.
21

22 DATED: April 28, 2026
23

24 **Gregory Pleasants Law, APC**

25 By:

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Gregory L. Pleasants
Attorney for Petitioner Kathleen Morrissey

Moel Lah Fakhoury LLP

By:



Shaffy Moeel
Attorney for Petitioner Kathleen Morrissey

First Amendment Coalition

By:



David Loy
Aaron R. Field
Attorneys for Petitioner Kathleen Morrissey

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VERIFICATION

I, Kathleen Morrissey, am the Petitioner/Plaintiff in this action.

I have read the foregoing Verified Petition for Writ of Mandate and Complaint for Declaratory Relief and Injunctive Relief Under the California Constitution and the California Public Records Act; Request for Attorney Fees and Costs. I have personal knowledge of the facts stated therein and verify that they are true, except for facts stated on information and belief, and as to such facts, I believe them to be true.

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

Executed on April 27, 2026, at San Diego, California.


Kathleen Morrissey (Apr 28, 2026 09:53:44 PDT)

KATHLEEN MORRISSEY

Exhibit A

Skip to main content

City of San Diego

 NextRequest

Request 25-5542 Closed

Dates

Received

July 21, 2025 via web

Staff assigned

Departments

Police

Point of contact

Angela Laurita

Request

I am requesting the 911 call logs and transcripts for two calls regarding ICE HSI and other federal agents' activity at the Mesa Vista apartments in Linda Vista on July 2. SDPD said it received two calls about the situation and sent eight officers, including a sergeant.

I would like to request the body camera footage of the SDPD officers who responded to the apartments during the ICE operation.

I would also like to request any reports, emails or other documents made by SDPD related to the incident.

I request to receive this information electronically and in an expedited manner given that I am a member of the media, and this request is for service to the public.

Show less

Timeline

Documents



Document(s) released Anyone with access to this request

SDPD Emails.pdf

January 23, 2026, 12:24pm by Angela Laurita, Public Records Administration Manager (Staff)



Request published Anyone with access to this request

August 31, 2025, 9:36pm



Request closed

Anyone with access to this request

02c. Released – Redacted and/or Withheld

All responsive documents have been released except those that have been redacted and/or withheld pursuant to:

[Law enforcement investigation] Government Code section 7923.600

[records of complaints to, or investigations conducted by, or records of intelligence information or security procedures of,any state or local police agency... are exempt from disclosure]

Government Code section 7922.000

The public interest in the nondisclosure of personal identifying information clearly outweighs the public interest in disclosure.

Government Code section 7923.615

This information is protected from disclosure pursuant to Government Code section 7923.615.

Government Code section 7922.000

The public interest in disclosure is outweighed by other factors.

[Haynie v. Superior Court, 26 Cal 4th 1061 (2001)]

August 28, 2025, 9:21 am by Angela Laurita, Public Records Administration Manager (Staff)

 **Document(s) released** Anyone with access to this request

E25070001766_Redacted.pdf

E25070002224_Redacted.pdf

August 28, 2025, 9:21 am by Angela Laurita, Public Records Administration Manager (Staff)

 **Department assignment** Anyone with access to this request

Police

July 21, 2025, 1:27pm by the requester

 **Request opened** Anyone with access to this request

Request received via web

July 21, 2025, 1:27pm by the requester

Terms

Exhibit B



Request 25-9835 Closed

Dates

Received

December 09, 2025 via web

Staff assigned

Departments

Police

Point of contact

Angela Laurita

Request

I am requesting the 911 call logs and transcripts on November 18, 2025, regarding ICE HSI and other federal agents' activity at the 47th Street Trolley Station. I believe calls related to this incident would have come in between 10am and noon.

I would like to request the body camera footage of the SDPD officers who responded to the situation.

I would also like to request any reports, emails or other documents made by SDPD related to the incident, including but not limited to communications with the contact for such incidents at the mayor's office.

I request to receive this information electronically and in an expedited manner given that I am a member of the media, and this request is for public service.

Show less

Timeline

Documents



Document(s) released Anyone with access to this request

SDPD Responsive Records.pdf

January 23, 2026, 12:16pm by Angela Laurita, Public Records Administration Manager (Staff)



Request published Anyone with access to this request

December 14, 2025, 8:35am



Request closed

Anyone with access to this request

01a. Not Released - Withheld

Any documents responsive to the request are being withheld pursuant to:

[Law enforcement investigation] Government Code section 7923.600

[records of complaints to, or investigations conducted by, or records of intelligence information or security procedures of,any state or local police agency... are exempt from disclosure]

Government Code section 7923.615

This information is protected from disclosure pursuant to Government Code section 7923.615.

[Haynie v. Superior Court, 26 Cal 4th 1061 (2001)]

Government Code section 7922.000

The public interest in disclosure is outweighed by other factors.

Government Code section 7927.705 [other state or federal law]

Information you have requested is protected from disclosure pursuant to Government Code section 7927.705:

Peace officer personnel records are protected from disclosure pursuant to Evidence Code section 1043.

December 11, 2025, 8:18am by Angela Laurita, Public Records Administration Manager (Staff)



Department assignment

Anyone with access to this request

Police

December 9, 2025, 4:26pm by the requester



Request opened

Anyone with access to this request

Request received via web

December 9, 2025, 4:26pm by the requester

Exhibit C



David Loy, Legal Director
dloy@firstamendmentcoalition.org
Direct: 1.619.701.3993

January 7, 2026

VIA ELECTRONIC MAIL

Heather Ferbert, Esq.
San Diego City Attorney
Office of the San Diego City Attorney
1200 Third Avenue, Suite 1100
San Diego, CA 92101
Email: hferbert@sandiego.gov

Re: Public Record Requests by Kate Morrissey

Dear Ms. Ferbert:

I represent Kate Morrissey, a reporter and co-founder of Daylight San Diego, who submitted two public record requests to the City of San Diego, No. 25-5542 and No. 25-9835, on July 21, 2025 and December 9, 2025, respectively.

I write to explain why the City's responses to her requests violate the California Public Records Act and to ask that the City disclose requested records immediately in the hope of avoiding potential litigation.

Please ensure that all records covered by the above requests are preserved until this matter is resolved. Please also let me know if there is another attorney in your office to whom this letter should be directed.

Request No. 25-5542

In Request No. 25-5542, Ms. Morrissey asked the City to disclose the following:

- "911 call logs and transcripts for two calls regarding ICE HSI and other federal agents' activity at the Mesa Vista apartments in Linda Vista on July 2";
- "the body camera footage of the SDPD officers who responded to the apartments during the ICE operation";
- "any reports, emails or other documents made by SDPD related to the incident."

The City disclosed two redacted call logs but withheld all other requested records, citing various exemptions.

According to a message sent to Ms. Morrissey by Lieutenant Travis Easter, the public information officer for San Diego Police Department ("SDPD"), "Our officers responded to a 911 call at approximately noon today (July 2, 2025) regarding an urgent request for cover from Homeland Security Agents working on 7900 Linda Vista Road, San Diego, CA 92111. Upon arrival, officers, accompanied by a supervisor, maintained the peace and safety of all on scene as HSI agents completed their objective and departed the area."

Request No. 25-9835

In Request No. 25-9835, Ms. Morrissey asked the City to disclose the following:

- “911 call logs and transcripts on November 18, 2025, regarding ICE HSI and other federal agents' activity at the 47th Street Trolley Station”;
- “the body camera footage of the SDPD officers who responded to the situation”;
- “any reports, emails or other documents made by SDPD related to the incident, including but not limited to communications with the contact for such incidents at the mayor's office.”

The City withheld all requested records, citing various exemptions.

According to [Times of San Diego](#), the November 18 incident involved federal immigration agents attempting to detain an individual and using force on other individuals at the 47th Street Trolley Station. The article reports that approximately “20 to 30 people had shown up at the trolley station when SDPD arrived and began separating federal agents and residents” and “SDPD officers arrested one man for misdemeanor battery for allegedly striking a federal agent in the face.” The article also reports “SDPD officers took pictures of” an individual’s “injuries, wrote down his name, and said to expect a call back, but did not give him a case number.”

According to Mayor Gloria’s [Executive Order No. 2025-1](#), issued July 23, 2025, the San Diego Police Department is required to “[d]esignate a departmental liaison to the Mayor's Office to report any instance where San Diego Police Department officers respond to an incident involving a federal agency conducting immigration enforcement activity in the City of San Diego.”

Analysis

The City cited the following exemptions in responding to Ms. Morrissey’s requests. For the following reasons, those exemptions cannot justify withholding all of the records she requested.

- **Investigatory records exemption**

The City cited Government Code section 7923.600, which exempts, in relevant part, “records of complaints to, or investigations conducted by ... any state or local police agency.” This exemption covers records of “investigations undertaken for the purpose of determining whether a violation of law may occur or has occurred. If a violation or potential violation is detected, the exemption also extends to records of investigations conducted for the purpose of uncovering information surrounding the commission of the violation and its agency.” *Haynie v. Superior Court*, 26 Cal. 4th 1061, 1071 (2001).

The exemption does not “shield everything law enforcement officers do from disclosure,” for example, records “related to crime prevention and public safety that are unrelated to either civil or criminal investigations.” *Id.*; see also *Castañares v. Superior Court*, 98 Cal. App. 5th 295, 310

(2023) (noting that where “drone video footage” is “part of an investigatory file” about an alleged crime or “officers used a drone to investigate whether a violation of law was occurring,” footage would be exempt from disclosure, but it is subject to disclosure if police are “using a drone to make a factual inquiry to determine what kind of assistance is required, not to investigate a suspected violation of law,” for example in responding to calls “about a mountain lion roaming a neighborhood, a water leak, or a stranded motorist on the freeway”).

As reflected in the decision in *Castañares*, the California Public Records Act requires a granular review of all relevant records, body camera video footage or otherwise, to determine what records are legitimately covered by the investigatory records exemption. An agency cannot “avoid disclosure under the CPRA simply by labeling certain information ‘investigatory.’” *Castañares*, 98 Cal. App. 5th at 306 n.7.

The City cited no evidence suggesting that SDPD officers were conducting any investigation of any alleged offenses during the July 2 incident in Linda Vista. To maintain “the peace and safety of all on scene as HSI agents completed their objective and departed the area,” as Lieutenant Easter described SDPD’s actions, may be a public safety function of law enforcement, but it does not represent the investigation of alleged crimes within SDPD’s jurisdiction. Although federal agents may have made arrests for alleged federal offenses at the July 2 incident, there is no reason to believe SDPD was part of any investigation into those offenses.

To the extent SDPD officers arrested a specific individual for an alleged misdemeanor during the November 18 incident at the 47th Street Trolley Station, perhaps the body camera footage of that particular event, or other records directly connected to the investigation of that particular alleged crime, might be exempt as investigatory records. But that does not mean every record generated by SDPD in its response to the entire incident at the 47th Street Trolley Station is automatically exempt from disclosure. To the extent there are records documenting that SDPD officers were making initial inquiries to determine what kind of assistance was required or providing security and crowd control, as opposed to investigating specific alleged crimes, such records must be disclosed.¹

In addition, any reports to the Mayor’s office about either incident made pursuant to the Executive Order or otherwise are not part of SDPD’s investigation into any alleged crime and are not protected by the investigatory records exemption.

Even assuming that some of the requested records are covered by the investigatory records exemption, the City’s response to Request No. 25-9835 violated the requirement to disclose “the time, substance, and location of all complaints or requests for assistance received by the agency and the time and nature of the response thereto, including, to the extent the information regarding crimes alleged or committed or any other incident investigated is recorded:

(A) The time, date, and location of occurrence.

¹ If any of the requested body camera footage or other records depict or relate to incidents or events covered by Penal Code section 832.7(b) or Government Code section 7923.625, for example because they relate to use of force resulting in great bodily injury, they would be subject to disclosure even if they otherwise qualified as investigatory records.

- (B) The time and date of the report.
- (C) The name and age of the victim.
- (D) The factual circumstances surrounding the crime or incident.
- (E) A general description of any injuries, property, or weapons involved."

Gov. Code § 7923.615(a)(2). In other cases, the City has complied with that requirement by disclosing relevant call logs, as it did for Request No. 25-5542. There is no apparent reason the City cannot do the same for Request No. 25-9835.

- **Personnel records**

In response to Request No. 25-9835, the City claimed that requested records were exempt from disclosure as “[p]eace officer personnel records.” To the extent there are personnel records pertaining to any internal affairs investigation of complaints about officers involved in the incident, perhaps such records are exempt from disclosure, provided they do not fall within any of the categories covered by S.B. 1421 and S.B. 16. See Penal Code §§ 832.7(a)–(b), 832.8.

However, records of the incident itself, such as call logs, incident reports, or body camera video footage, as opposed to records of any subsequent internal affairs investigation, are not peace officer personnel records. See *Long Beach Police Officers Ass’n. v. City of Long Beach*, 59 Cal. 4th 59, 71 (2014) (noting “many records routinely maintained by law enforcement agencies are not personnel records. For example, the information contained in the initial incident reports of an on-duty shooting are typically not ‘personnel records’ as that term is defined in Penal Code section 832.8”). Nor would any reports to the Mayor’s office pursuant to the Executive Order qualify as personnel records.

- **Catchall exemption**

The City cited the CPRA’s catchall exemption, which allows an agency to withhold records if it can prove “on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.” Govt. Code § 7922.000. This “provision contemplates a case-by-case balancing process, with the burden of proof on the proponent of nondisclosure to demonstrate a clear overbalance on the side of confidentiality.” *American Civil Liberties Union Foundation v. Superior Court*, 3 Cal. 5th 1032, 1043 (2017).

The City gave no reason for invoking the catchall exemption, and it is difficult to understand how the catchall exemption could apply. The request seeks a limited set of records about a single incident and does not impose an undue burden. The public has a compelling interest in the conduct of police officers. *Com. on Peace Officer Stds. & Training v. Superior Court*, 42 Cal. 4th 278, 297 (2007); *Pasadena Police Officers Ass’n. v. Superior Court*, 240 Cal. App. 4th 268, 283 (2015). It is not clear if the City is alleging any concerns for officer safety, but “vague safety concerns” cannot “foreclose the public’s right of access.” *ACLU Found.*, 3 Cal. 5th 1032, 1043 (2017); see also *Long Beach Police Officers Ass’n v. City of Long Beach*, 59 Cal. 4th 59, 74 (2014) (“Vague safety concerns that apply to all officers involved in shootings are insufficient to tip the balance against disclosure of officer names.”); *CBS, Inc. v. Block*, 42 Cal. 3d 646, 652

(1986) (“A mere assertion of possible endangerment does not ‘clearly outweigh’ the public interest in access to these records.”).

For the foregoing reasons, please ensure that records requested by Ms. Morrissey are disclosed immediately to avoid potential litigation against the City. Thank you for your attention to this matter and please let me know if you have any questions.

Sincerely,

FIRST AMENDMENT COALITION



David Loy
Legal Director

Exhibit D

LESLIE FITZGERALD
ASSISTANT CITY ATTORNEY

MICHELLE GARLAND
ASSISTANT CITY ATTORNEY

JILL S. CRISTICH
DEPUTY CITY ATTORNEY

OFFICE OF
THE CITY ATTORNEY
CITY OF SAN DIEGO
HEATHER FERBERT
CITY ATTORNEY

CIVIL ADVISORY DIVISION
1200 THIRD AVENUE, SUITE 1620
SAN DIEGO, CALIFORNIA 92101-4178
TELEPHONE (619) 533-5800

January 22, 2026

VIA ELECTRONIC MAIL

David Loy, Legal Director
First Amendment Coalition
dloy@firstamendmentcoalition.org

California Public Records Requests by Kate Morrissey
Re: CPRA No. 25-5542 and No. 25-9835

Dear Mr. Loy:


The Office of the City Attorney received your letter dated January 7, 2026. The City has reviewed CPRA request No. 25-5542 and No. 25-9835. The City maintains the exemptions asserted under California Government Code sections 7923.600, 7922.000, 7923.615, 7927.705/Evidence Code 1043, and *Haynie v. Superior Court*, 26 Cal. 4th 1061 (2001). The City also maintains that it does not have any 911 transcripts. The San Diego Police Department does not transcribe 911 calls to the dispatch center.

After further review, the City located a CAD report for CPRA request No. 25-9835 and emails that are responsive to both CPRA requests, as well as responsive records related to Mayor Gloria's Executive Order No. 2025-1. These additional records will be uploaded in NextRequest on Friday, January 23, 2026.

Please let me know if you wish to discuss further.

Sincerely yours,

HEATHER FERBERT, City Attorney

By 
Michelle Garland
Assistant City Attorney

MG:JSC:amt:jvg

Exhibit E

----- Forwarded message -----

From: **Easter, Travis** <teaster@pd.sandiego.gov>

Date: Thu, Jul 17, 2025 at 7:28 AM

Subject: RE: [EXTERNAL] SDPD in Linda Vista

To: Kate Morrissey <katethejournalistmorrisey@gmail.com>

Good Morning Kate,

For your last two questions:

-The San Diego Police Department does not receive funding for Operation Stonegarden nor participate in any task forces with ICE and/or CBP.

Very Respectfully,

Lt. Travis Easter

Public Information Officer

Media Relations Unit

San Diego Police Department

Office Number: 619-531-2840

Work Cell Number: 619-288-1631

From: Kate Morrissey <katethejournalistmorrisey@gmail.com>

Sent: Wednesday, July 16, 2025 5:41 PM

To: Easter, Travis <teaster@pd.sandiego.gov>

Subject: Re: [EXTERNAL] SDPD in Linda Vista

Thank you! Whenever you are able to get those other answers, I would still like to have them.

Take care,

Kate

On Wed, Jul 16, 2025 at 5:30 PM Easter, Travis <teaster@pd.sandiego.gov> wrote:

Hi Kate,

Below are some of the answers to your inquiry.

Concerning the Linda Vista incident:

We did not put up the police tape during that incident. It was already up when our officers arrived. We received two 911 calls for that incident. You will have to speak with HSI concerning the movement of the tape and why they called for emergency assistance.

The Mission Beach Incident:

The San Diego Police Department received a request for assistance by federal agents in the area of Mission Beach earlier. We provided traffic control due to the streets being blocked by the presence of fire engines. The San Diego Police Department was not involved in any other way. Contact HSI for details pertaining to the nature of the incident

Additional questions:

-We are aware of Councilmember Rivera's potential ordinance. At this time, we will continue to operate under the law established via Senate Bill 54 and our Department Procedure.

-I will need more time to get the answers to your last two questions. I hope this helps for now.

Very respectfully,

Lt. Travis Easter

Get [Outlook for iOS](#)

From: Kate Morrissey <katethejournalistmorrissey@gmail.com>

Sent: Wednesday, July 16, 2025 1:05:40 PM

To: Easter, Travis <teaster@pd.sandiego.gov>

Subject: Re: [EXTERNAL] SDPD in Linda Vista

Hi Travis,

I hope you're doing well.

I have a few more questions about this incident as well as a couple of bigger picture questions.

-who put up the police tape during the Linda Vista operation? was that SDPD or the federal agents?

-it appears the police tape moved from a tighter-in location to a location closer to the property perimeter. why did that happen?

-how many 911 calls did SDPD receive related to the Linda Vista incident?

It appears that SDPD was also present yesterday during an immigration enforcement operation in Mission Bay involving families living in camper vans or similar.

-What was SDPD's role, why were officers there and how many officers were involved?

-does SDPD have a position on a potential ordinance from Councilmember Elo Rivera regarding its officers' responding to ICE?

-does SDPD receive Operation Stonegarden funding, and if so how much and for what purpose?

-what task forces does SDPD participate on that include ICE and/or CBP?

My deadline is today.

Thanks so much for your time and take care,

Kate

On Thu, Jul 3, 2025 at 1:17 PM Easter, Travis <teaster@pd.sandiego.gov> wrote:

Hi Kate,

The HSI agents requested for emergency assistance while they were at the location. When an agency calls for emergency assistance, we do not assess to determine whether their request was valid or not. If an officer or anyone requests emergency assistance, our priority is the preservation of life and to get there as quickly and safely as possible. It is not for us to determine the validity of one's request if they are asking for emergency assistance. Seven officers and one sergeant responded to their request for emergency assistance.

Very Respectfully,

Lt. Travis Easter

Public Information Officer

Media Relations Unit

San Diego Police Department

Office Number: 619-531-2840

Work Cell Number: 619-288-1631

From: Kate Morrissey <katethejournalistmorrissey@gmail.com>
Sent: Thursday, July 3, 2025 11:25 AM
To: Easter, Travis <teaster@pd.sandiego.gov>
Subject: Re: [EXTERNAL] SDPD in Linda Vista

Thanks for your quick response, Travis.

A couple more questions for you to follow up:

- what was the reason that the HSI agents said they needed cover?
- did SDPD assess whether that was valid when they arrived?
- how many SDPD officers were present at the site?

Take care,

Kate

On Wed, Jul 2, 2025 at 7:25 PM Easter, Travis <teaster@pd.sandiego.gov> wrote:

Hi Kate,

Our officers responded to a 911 call at approximately noon today (July 2, 2025) regarding an urgent request for cover from Homeland Security Agents working on 7900 Linda Vista Road, San Diego, CA 92111. Upon arrival, officers, accompanied by a supervisor, maintained the peace and safety of all on scene as HSI agents completed their objective and departed the area.

Homeland Security Investigations (HSI) is a federal law enforcement agency with its own policies and procedures concerning the use of force. We will not provide a comment about their use of force during this incident. Please contact HSI for further questions pertaining to it.

The San Diego Police Department abides by Senate Bill 54 and has specific language in our Department procedure, which I have attached from our public website, that outlines what we are allowed and not allowed

to do concerning adult undocumented persons. Our officers can provide emergency assistance as we would for all law enforcement agencies to protect public safety. Our officers' focus is on detecting and apprehending individuals involved in criminal activity. We are not looking for violations of immigration laws.

[6.18 ADULT UNDOCUMENTED PERSONS](#)

Very Respectfully,

Lt. Travis Easter

Public Information Officer

Media Relations Unit

San Diego Police Department

Office Number: 619-531-2840

Work Cell Number: 619-288-1631

From: Kate Morrissey <katethejournalistmorrissey@gmail.com>

Sent: Wednesday, July 2, 2025 5:21 PM

To: Easter, Travis <teaster@pd.sandiego.gov>

Subject: [EXTERNAL] SDPD in Linda Vista

Hi Travis,

SDPD officers were at 7980 Linda Vista Rd at an apartment complex today while numerous immigration officials, including ICE, were conducting some kind of operation. It appears they arrested one young man this morning and then came back.

Based on video from witnesses, when they came back, SDPD was with them. Several people who were documenting the federal agents' activity were arrested, including a man whom they brought into the police line area and then tackled to the ground right in front of SDPD. Among other actions, the federal agents' took photos of all of the license plates in the parking lot, which will likely be used for future immigration enforcement.

Was SDPD concerned about the federal agents' use of force?

Why was SDPD there at all, given the limitations from SB 54?

My deadline is noon on Thursday.

Thanks and take care,

Kate

--

Kate Morrissey

Immigration Reporter

[Beyond the Border](#)

[Daylight San Diego](#)

Exhibit F

Call For Service

Event ID: **E25070001766**

Event Created: **7/2/2025 7:46:16 AM**

Call For Service

Event ID **E25070001766**
Event Created **7/2/2025 7:46:16 AM**
Dispatcher **SD8240 - [REDACTED]**
Call Source
Received **7/2/2025 7:46:16 AM**
Dispatched **7/2/2025 7:48:19 AM**
Arrived **7/2/2025 7:48:20 AM**
Cleared **7/2/2025 1:04:47 PM**
Location **7980 Linda Vista Rd**
City, State, Zip **SAN DIEGO, CA 92111**
Beat **1111**
Grid
Jurisdiction **Clairemont Mesa East - San Diego**
Map
X Coordinate
Y Coordinate
Longitude **-117.155825**
Latitude **32.806348**

Reporting Party [REDACTED]
Address [REDACTED]
City, State, Zip [REDACTED]
Phone [REDACTED]
Call type **ADW**
Event Type **ADW**
Reported Offense
Verified Offense
Tow Company
Vehicle
Vehicle License
Disposition **K**
Priority
Classification
Agency **SDPD - San Diego Police Dept**
Cases

Officers

SD1137 - BRACE, MATTHEW
SD5531 - AGUILAR, JASON
SD7443 - NELSON, ROBERT
SD1914 - BUTLER, JASON
SD7237 - GRYBOW, JACOB
SD7824 - STANEK, AUSTIN
SD7776 - TELLAM, JUSTIN
SD1066 - ARRIERO, JR., JOSE
SD6642 - DYEMARTIN, ALAN
SD1998 - BERMUDEZ, HECTOR
SD9936 - VILLAREAL, JESSICA
SD1741 - KIM, PAUL
SD6614 - STEPHENS, BRIAN
SD2024 - MUNGUIA, KAREN
SD7026 - ESCALANTE, RICARDO
SD1592 - CALDERA, ALDO
SD1565 - CLEMONS, JOHN
SD1542 - HONG, CHIN
SD1861 - RINCONENO - ALVAREZ, NICOLE
SD7360 - RODRIGUEZ, JOSE
SD2011 - MERINO, CHRISTIAN
SD9948 - ORSI, CLAUDIA

Notes **7/2/2025 07:47:25 [REDACTED] 2 AGENTS IN 2
VEHS// BLK CHEV IMPALA AND DK GRY NISS ARMADA// SURVEILLANCE UNTIL NOON// RP WILL CB**

Call For Service

CFS Number: **E25070001766**

Date: **7/2/2025 7:46:16 AM**

WHEN CLEAR// POSS MORE AGENTS WILL JOIN LATER
7/2/2025 07:47:26 ** LOI search completed at 07/02/25 07:47:26
7/2/2025 07:48:34 ROUTED TO P1
7/2/2025 10:24:58 [REDACTED] Duplicate Event: Loc: 7989
LINDA VISTA RD SD, xstreets: BALTIC ST/STALMER ST, Type: 245 - ADW, Subtype: HC - HOT CALL, Caller
Name: [REDACTED], Caller Ph Number: [REDACTED], Caller Address: [REDACTED], Call
Source: ANI/ALI, Alarm Level: 0
7/2/2025 10:24:58 [REDACTED] WPH2 -117.155563 32.8063130
7/2/2025 10:24:58 [REDACTED] SUBJ RAN INTO AGENTS AND
AGENT'S VEH
7/2/2025 10:24:58 [REDACTED] End of Duplicate Event data
7/2/2025 10:25:07 ** Event Type changed from INFO to 245(HC) at: 07/02/25 10:25:07
7/2/2025 10:25:07 ** Event Priority changed from 2 to 0 at: 07/02/25 10:25:07
7/2/2025 10:26:49 ATTEMPTD TO RUN OVER AGENTS, STILL IN GRY FORD MUSTANG
7/2/2025 10:26:49 8NBR512
7/2/2025 10:27:25 AU P2 P3 P6
7/2/2025 10:27:29 AU P5 - ROUTE P5
7/2/2025 10:27:56 SUSP IS STILL INSD VEH, NO WPNS SEEN
7/2/2025 10:28:16 NO PD RADIO
7/2/2025 10:28:30 116B1 -- ROLLING CODE 3 ** 121S1
7/2/2025 10:28:35 116J1 -- C3, 121S1 10-4
7/2/2025 10:29:17 SUSP IS [REDACTED] HM 25 5'9 MED BLD
7/2/2025 10:29:36 611S1 T4
7/2/2025 10:30:12 SUSP IS [REDACTED] WRG BLK SHIRT, BLK SHORTS,
7/2/2025 10:30:12 INSD COMPLEX
7/2/2025 10:30:27 NEXT TO BLDG [REDACTED]
7/2/2025 10:31:14 4 AGENTS 97, REFUSING MEDICS BUT HAVE CUTS AND SCRAPES
7/2/2025 10:32:02 VEH IS STILL RUNNING, SUSP STILL INSD VEH
7/2/2025 10:33:11 4223J1 -- UTS TO DROP CODE, ONE SIC
7/2/2025 10:33:14 OFFICERS WITH RP// DISCONNECTED CALL WITH RP
7/2/2025 10:33:36 ** LOI search completed at 07/02/25 10:33:36
7/2/2025 10:33:36 ** Event Location changed from "[REDACTED]" to "[REDACTED]"
[REDACTED] at: 07/02/25 10:33:36
7/2/2025 10:33:56 315J1 -- CORRECT ADDR FOR UTS IS [REDACTED]
7/2/2025 10:34:25 4223J1 -- NO ONE OUTSTANDING
7/2/2025 10:34:52 116J1 -- C4 ALL THE WAY AROUND
7/2/2025 10:36:30 PER AGENTS, PD WAS NOT NEEDED, THEY WILL BE PRESSING OWN CHARGES
ETC
7/2/2025 10:47:18 [REDACTED]
[REDACTED] RP CB, REQ PD RETURN FOR COLLISION PORTION OF EVENT
7/2/2025 10:51:30 CALLBACK ** PLS ADV AGENT DELVILLAR IF THE COLLISION WAS
7/2/2025 10:51:30 INTENTIONAL AND CARRIED AS A 245, THERE IS NO COLLISION
7/2/2025 10:51:30 1110 TO BE TAKEN PER 3913S1
7/2/2025 10:53:49 NR ON CB X 2,LVM
7/2/2025 10:58:18 ON CB RP IS T4 ON LAST AND PASSED PHONE TO SUPERVISOR AND ALSO T4 ON
LAST // ADV THERE IS A DETECTIVE 97 AND WILL SORT IT OUT WITH THEM
7/2/2025 11:00:38 ** Event E25070001766 closed.
7/2/2025 11:27:28 ORIG RP "[REDACTED]" CB TO ADV WILL BE CLEARING SCENE, WAITING ON TOW
7/2/2025 12:11:25 ** LOI search completed at 07/02/25 12:11:25

Call For Service

CFS Number: **E25070001766**

Date: **7/2/2025 7:46:16 AM**

7/2/2025 12:11:25 ** Event E25070001766 has been reopened at: 07/02/25 12:11:25

7/2/2025 12:13:27 121J1

7/2/2025 12:13:58 MEMO1 -- CALLBACK ** PLS CALL RP AND CONFIRM HE AND HIS TEAM ARE

7/2/2025 12:13:58 C4

7/2/2025 12:15:50 ON CB RP ADV THEY ARE C4 JUST 1023 FOR THE TOW TRUCK

7/2/2025 13:04:47 ** Event E25070001766 closed.

Call For Service

Event ID: **E25070002224**

Event Created: **7/2/2025 12:05:07**

DM

Call For Service

Event ID **E25070002224**
Event Created **7/2/2025 12:05:07 PM**
Dispatcher **SD8891 - [REDACTED]**
Call Source **ANI/ALI**
Received **7/2/2025 12:05:07 PM**
Dispatched **7/2/2025 12:10:14 PM**
Arrived **7/2/2025 12:24:13 PM**
Cleared **7/2/2025 1:22:06 PM**
Location **7982 Linda Vista Rd**
City, State, Zip **SAN DIEGO, CA 92111**
Beat **1111**
Grid
Jurisdiction **Clairemont Mesa East - San Diego**
Map
X Coordinate
Y Coordinate
Longitude **-117.155224**
Latitude **32.806274**

Reporting Party
Address
City, State, Zip
Phone
Call type **CALLING FOR HELP**
Event Type **CALLING FOR HELP**
Reported Offense
Verified Offense
Tow Company
Vehicle
Vehicle License
Disposition **K**
Priority
Classification
Agency **SDPD - San Diego Police Dept**
Cases

Officers

SD7237 - GRYBOW, JACOB
SD7824 - STANEK, AUSTIN
SD1693 - DURAN GARCIA, MIGUEL
SD1680 - RAYAS, BRANDON
SD2011 - MERINO, CHRISTIAN
SD9948 - ORSI, CLAUDIA
SD1914 - BUTLER, JASON
SD7026 - ESCALANTE, RICARDO
SD7443 - NELSON, ROBERT
SD6642 - DYEMARTIN, ALAN
SD1066 - ARRIERO, JR., JOSE
SD1795 - GUZMAN, DANIELLE
SD7018 - ALT, BRYAN
SD2024 - MUNGUIA, KAREN
SD1561 - FLORES, VANESSA
SD1832 - ARELLANO FREGOSO, JOSE
SD1517 - MCGURRELL, KAILEY
SD1562 - ROZAR, JOHN
SD1725 - HOLMES, AUDREY
SD1137 - BRACE, MATTHEW
SD6444 - WILSON, MELINDA
SD6614 - STEPHENS, BRIAN
SD7349 - MALLORY, ERIC

Notes **7/2/2025 12:07:33 [REDACTED] JWPH2 -117.155606 32.8062057**

Call For Service

CFS Number: **E25070002224**

Date: **7/2/2025 12:05:07 PM**

7/2/2025 12:07:33 [REDACTED]-117.155628 32.8061199
7/2/2025 12:07:33 [REDACTED]LOCATION SAVED BY
LOCATECALL - LL(-117:09:20.1818,32:48:22.3405): EST 0 LINDA VISTA FRONTAGE RD SD
7/2/2025 12:07:33 [REDACTED]OPEN LINE ON 911 W/ MALES
SOMEONE MENTIONED "ASSAULTING A FEDERAL POLICE OFFICER" IN BACKGROUND
7/2/2025 12:07:34 ** LOI search completed at 07/02/25 12:07:34
7/2/2025 12:07:40 FYI SENT TO LD01
7/2/2025 12:09:28 ** LOI search completed at 07/02/25 12:09:28
7/2/2025 12:09:28 ** Event Location changed from [REDACTED] to [REDACTED]
[REDACTED] at: 07/02/25 12:09:28
7/2/2025 12:10:30 MALE NOW ONLINE ADV MALE ASSAULTED HIM AND RP IS TRYING TO GET HIS
INFO
7/2/2025 12:10:42 121S1 10-4
7/2/2025 12:10:45 ** Event Type changed from 1131 to 1131(HC) at: 07/02/25 12:10:45
7/2/2025 12:10:45 ** Event Priority changed from 1 to 0 at: 07/02/25 12:10:45
7/2/2025 12:11:12 FALLBACK
7/2/2025 12:12:27 RP ADV'D PEOPLE CLAIM TO BE OFCRS AND HAVE POLICE LINE SET UP, RP
CROSSED IT TO TRY TO GET THEIR NAMES AND WAS PUSHED/SUBJS ARE NOT IN UNIFORM/LOTS
OF YELLING HEARD BY SEVERAL PEOPLE THEN PH DISC
7/2/2025 12:14:08 FYI SENT TO LDET
7/2/2025 12:15:25 10 SUBJS IN 4 VEHS -- TWO WERE ASSAULTED
7/2/2025 12:16:11 RP IS CITZ, HOMELAND SECURITY IS 97, WANTS TO PRESS
7/2/2025 12:16:11 CHARGES AGAINST AGENTS
7/2/2025 12:17:19 WILL BE INSD MESA VISTA APTS
7/2/2025 12:17:50 [REDACTED]RP IS FROM HSI AND ADVISED THEY ARE IN THE AP
COMPLEX IN BETWEEN BUILDINGS AND CURRENTLY IFO [REDACTED]
7/2/2025 12:18:56 [REDACTED]SYS THAT THERE IS A CROWD FORMING AND THAT SOME OF
THEM MIGHT BE CALLING IN PD ON THEM //NFD,NFI
7/2/2025 12:19:28 [REDACTED]
7/2/2025 12:20:06 [REDACTED]RP CALLING RE SAME ADV
SEVERAL UNMARKED VEHS AT LOC // SEVERAL MALES WRNG FULL FACE COVERINGS // RP ADV
SEVERAL PASSERBYS STOPPING AND TAKING VIDEOS OF MALES AND CROWDING THEM // NFI NFD
7/2/2025 12:20:48 10 RESD ARE ALSO AT LOC INVOLVED IN 415 W/HSI
7/2/2025 12:22:53 GROUP OF ABOUT 20 NOW, 10 AGENTS AND 10 CITZ, VERBAL 415 GOING ON
7/2/2025 12:24:26 NOW HAVE AN OPEN LINE
7/2/2025 12:24:41 121S1 -- AGENTS C4, WAITING FOR A TOW
7/2/2025 12:24:53 121S1 -- WILL BE A PP
7/2/2025 12:25:02 RP DISCONNECTED // NOT CB
7/2/2025 12:25:06 RP SAYING HE WANTS TO PRESS CHARGES
7/2/2025 12:27:01 AUP3
7/2/2025 12:27:04 111B1 -- RP IS ARRESTABLE FOR 242 ON FEDERAL AGENTS
7/2/2025 12:29:19 111B1 -- MORE CITZ ARE POSS ENRT, WILL 1023
7/2/2025 12:31:46 126K1 -- EMERGENCY TONE **
7/2/2025 12:32:19 126K1 -- REQING C3 COVER
7/2/2025 12:32:38 126K1 -- EMERGENCY TONE **
7/2/2025 12:33:06 111B1 -- UTS TO DROP CODE
7/2/2025 12:33:45 AUP6
7/2/2025 12:40:25 121S1 -- WILL BE ON A PP, 100 OR SO PPL 97, TOW 97 AND TAKING THE
7/2/2025 12:40:25 VEH

Call For Service

CFS Number: **E25070002224**

Date: **7/2/2025 12:05:07 PM**

7/2/2025 12:40:43 121S1 -- CORRECTION, IS ABOUT 10 PEOPLE 97
7/2/2025 12:42:58 121S1 -- C4 FOR UNITS
7/2/2025 12:55:51 121S1 -- ALL UNITS CLEAR OUT OF THE AREA
7/2/2025 13:22:06 ** Event E25070002224 closed.

Exhibit G

From: [Rodriguez, Ramiro](#)
To: [Manansala, Benjerwin](#); [Sharki, Adam](#)
Subject: 7/3/25 Northern Patrol Branch
Date: Friday, July 4, 2025 3:30:18 AM
Attachments: [image001.png](#)

Good morning, Commanders. The only thing of note:

Type:

Event #: 25070004555

Date/Time: 7/03/25 @ 2237

Location: [REDACTED]

Beat: 111

Victim: [REDACTED]
[REDACTED]

Suspect:

Synopsis:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Respectfully,

Ramiro Rodriguez
Lieutenant – SDPD

[REDACTED]
[REDACTED]



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From: Alvarez, Betty
 To: Alvarez, Betty; Ambito, Albert; Cahill, Roxanne; Clendenen, Tammy; Dobbs, Matthew; Easter, Travis; Flores, Cindy; Hara, Jerry; Hecht, Teresa; Holden, Mike; Kelsa, Benjamin; Kim, Linda; Magino, Marciana; Makwana, Joanna; Manansala, Benjamin; Mann, Walter; Meyer, Daniel; Mitchell, Maria; Morris, John; Mueller, Melanie; Nachand, Laurie; Novak, Matt; Populin, Christiane; Radaasa, Ricky; Sanchez, Juan; Saragata, Melissa; Schule, Danielle; Sharki, Adam; Smith, Garrin; Steward, Chrystal; Tai, Rudolph; Takeuchi, Shawn; Troupe, Eleanor; Wallace, Jerrell; Weeden, Jason; Williams, Tina
 Subject: Northern 24 [REDACTED] 9111
 Date: Wednesday, July 2, 2025 12:40:38 PM

E25070001766 - 245 - HC - ADW - HOT CALL
 7980 LINDA VISTA RD SD

Event Type	Event ID	Priority	Status	Source	DGroup	Case Numbers	Disposition Code	Terminal	Dup No.	Calltaker ID
245	E25070001766	0	A		P1		K	tct15		9118240

Agency Information

Agency	Priority	DGroup	ESZ	Area	Added	Dispatched	Arrived	Closed	Close ID	Close Terminal	Event ID	Primary Unit	Situation	Comments
SDPD	0	P1	111	111	07/02/25 07:47:25	07/02/25 07:48:19	07/02/25 07:48:20				E25070001766	312S1		

Remarks Agency Specific Common

[REDACTED] 2 AGENTS IN 2 VEH// BLK CHEV IMPALA AND DK GRY NISS ARMADA// SURVEILLANCE UNTIL NOON// RP WILL CB WHEN CLEAR// POSS MORE AGENTS WILL JOIN LATER
 ROUTED TO P1

[REDACTED] Duplicate Event: Loc: 7989 LINDA VISTA RD SD, xstreets: BALTIC ST/STALMER ST, Type: 245 - ADW, Subtype: HC - HOT CALL, Caller Name: [REDACTED],
 Caller Ph Number: [REDACTED], Caller Address: [REDACTED], Call Source: ANI/ALI, Alarm Level: 0

[REDACTED] WPH2 -117.155563 32.8063130
 [REDACTED] SUBJ RAN INTO AGENTS AND AGENT'S VEH
 [REDACTED] End of Duplicate Event data

ATTMPTD TO RUN OVER AGENTS, STILL IN GRY FORD MUSTANG

8NBR512

AU P2 P3 P6

AU P5 - ROUTE P5

SUSP IS STILL INSD VEH, NO WPNS SEEN

NO PD RADIO

116B1 -- ROLLING CODE 3 ** 121S1

116J1 -- C3, 121S1 10-4

SUSP IS [REDACTED] HM 25 5'9 MED BLD

611S1 T4

SUSP IS [REDACTED] WRG BLK SHIRT, BLK SHORTS,

INSD COMPLEX

NEXT TO BLDG [REDACTED]

4 AGENTS 97, REFUSING MEDICS BUT HAVE CUTS AND SCRAPES

VEH IS STILL RUNNING, SUSP STILL INSD VEH

4223J1 -- UTS TO DROP CODE, ONE SIC

OFFICERS WITH RP// DISCONNECTED CALL WITH RP

315J1 -- CORRECT ADDR FOR UTS IS [REDACTED]

4223J1 -- NO ONE OUTSTANDING

116J1 -- C4 ALL THE WAY AROUND

PER AGENTS, PD WAS NOT NEEDED, THEY WILL BE PRESSING OWN CHARGES ETC

[REDACTED] RP CB, REQ PD RETURN FOR COLLISION PORTION OF EVENT

CALLBACK ** PLS ADV AGEN [REDACTED] IF THE COLLISION WAS

INTENTIONAL AND CARRIED AS A 245, THERE IS NO COLLISION

1110 TO BE TAKEN PER 3913S1

NR ON CB X 2,LVM

ON CB RP IS T4 ON LAST AND PASSED PHONE TO SUPERVISOR AND ALSO T4 ON LAST // ADV THERE IS A DETECTIVE 97 AND WILL SORT IT OUT WITH THEM

ORIG RP [REDACTED] CB TO ADV WILL BE CLEARING SCENE, WAITING ON TOW

121J1

MEMO1 -- CALLBACK ** PLS CALL RP AND CONFIRM HE AND HIS TEAM ARE

C4

ON CB RP ADV THEY ARE C4 JUST 1023 FOR THE TOW TRUCK

See more remarks Show system remarks

Caller Information

- Name: [REDACTED]
- Phone: [REDACTED]
- Address: [REDACTED]

Thank you,

Betty Alvarez
 Police Dispatch Supervisor

Work Days: Mon - Thu

[REDACTED]

From: [Rodriguez, Ramiro](#)
To: [Manansala, Benjerwin](#); [Sharki, Adam](#)
Subject: Northern Branch 7/1
Date: Thursday, July 3, 2025 3:27:51 AM
Attachments: [image001.png](#)

Good morning, Commanders. Please see the below events from over the night.

Type: CCF ([REDACTED])

Event #: 25070002879

Date/Time: 7/01/25 @ 2115

Location: [REDACTED]

Beat: 521

Victim:

Suspect:

Synopsis:

[REDACTED]

Type: 20001 CVC

Event #: 25070002934

Date/Time: 7/01/25 @ 2115

Location: La Jolla Village Drive/ Executive Way

Beat: 115

Victim: [REDACTED]

Suspect:

Synopsis:

[REDACTED]

Type: PRT Assist

Event #: 25070003021

Date/Time: 7/01/25 @ 2353

Location: [REDACTED]

Beat: 323

Victim: [REDACTED]

Suspect: [REDACTED]

Synopsis:

[REDACTED]

Respectfully,

Ramiro Rodriguez
Lieutenant – SDPD

[REDACTED]



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From: [Easter, Travis](#)
To: [Winkley, Lyndsay](#); [Madison, Chloe](#)
Cc: [Nicholes, Ashley](#)
Subject: Radio call information for previous HSI incidents
Date: Thursday, July 10, 2025 4:12:22 PM
Attachments: [REDACTED]

Good Afternoon Ladies,

Attached is a rough draft of a powerpoint for the HSI information that was requested.

Very Respectfully,

Lt. Travis Easter

Public Information Officer

[REDACTED]

San Diego Police Department

[REDACTED]

[REDACTED]

From: [Hodgson, Tracy](#)
To: [Easter, Travis](#)
Subject: RE: HSI Calls for assistance
Date: Monday, July 14, 2025 2:49:51 PM

Perfect, pulling it now.

From: Easter, Travis [REDACTED]
Sent: Monday, July 14, 2025 2:49 PM
To: Hodgson, Tracy [REDACTED]
Subject: RE: HSI Calls for assistance

10:23 – 10:24

Very Respectfully,
Lt. Travis Easter
Public Information Officer
[REDACTED]
San Diego Police Department

[REDACTED]
[REDACTED]

From: Hodgson, Tracy [REDACTED]
Sent: Monday, July 14, 2025 2:47 PM
To: Easter, Travis [REDACTED]
Subject: RE: HSI Calls for assistance

For the incident July 2nd what time do you want radio until?

From: Easter, Travis [REDACTED]
Sent: Monday, July 14, 2025 2:43 PM
To: Hodgson, Tracy [REDACTED]
Subject: RE: HSI Calls for assistance

The initial dispatch that shows what our officers heard. It can be for the first two minutes. That should be a good catch-all.

Very Respectfully,
Lt. Travis Easter
Public Information Officer
[REDACTED]
San Diego Police Department

[REDACTED]

[REDACTED]

From: Hodgson, Tracy <[REDACTED]>

Sent: Monday, July 14, 2025 2:40 PM

To: Easter, Travis [REDACTED]

Subject: RE: HSI Calls for assistance

Good afternoon Easter,

What time do you want the radio transmission until for the two incidents?

Tracy

From: Easter, Travis [REDACTED] >

Sent: Monday, July 14, 2025 2:33 PM

To: Hodgson, Tracy [REDACTED]

Cc: Nicholes, Ashley [REDACTED]; Winkley, Lyndsay [REDACTED]

Subject: HSI Calls for assistance

Hey Tracy,

Thanks again for your help with getting the audio for these incidents. As we discussed, I need to get the radio dispatch for the following incidents.

1. May 30 – 18:06 – Central Division – E25050044023
2. July 2 – 10:25 – Northern Division – E25070001766

If I'm missing anything, please don't hesitate to let me know. As always, any help you can provide will be greatly appreciated.

Very Respectfully,

Lt. Travis Easter

Public Information Officer

[REDACTED]
San Diego Police Department
[REDACTED]
[REDACTED]

From: [Sharki, Adam](#)
To: [Rodriguez, Ramiro](#)
Subject: RE: Northern Branch 7/1
Date: Thursday, July 3, 2025 11:23:38 AM
Attachments: [image002.png](#)
[image003.png](#)

Thanks Ramiro.

Adam

Adam T. Sharki

Commander

[REDACTED]
San Diego Police Department



From: Rodriguez, Ramiro [REDACTED]
Sent: Thursday, July 3, 2025 3:28 AM
To: Manansala, Benjerwin [REDACTED]; Sharki, Adam
[REDACTED]
Subject: Northern Branch 7/1

Good morning, Commanders. Please see the below events from over the night.

Type: CCF [REDACTED])
Event #: 25070002879
Date/Time: 7/01/25 @ 2115
Location: [REDACTED]
Beat: 521
Victim:
Suspect:
Synopsis:

[REDACTED]

Type: 20001 CVC
Event #: 25070002934
Date/Time: 7/01/25 @ 2115

Location: [REDACTED]

Beat: 115

Victim: [REDACTED]

Suspect:

Synopsis:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Type: PRT Assist
Event #: 25070003021
Date/Time: 7/01/25 @ 2353

Location: [REDACTED]

Beat: 323

Victim: [REDACTED]

Suspect: [REDACTED]

Synopsis:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Respectfully,

Ramiro Rodriguez
Lieutenant – SDPD

[REDACTED]
[REDACTED]



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From: [Manansala, Benjerwin](#)
To: [Rodriguez, Ramiro](#)
Subject: Re: Northern Branch 7/1
Date: Thursday, July 3, 2025 5:47:39 AM
Attachments: [image001.png](#)

10-4. Thanks Ramiro.

Erwin Manansala
Police Commander

San Diego Police Department

[REDACTED]

1401 Broadway
San Diego, CA 92101

[REDACTED]

On Jul 3, 2025, at 3:27 AM, Rodriguez, Ramiro [REDACTED] wrote:

Good morning, Commanders. Please see the below events from over the night.

Type: CCF ([REDACTED])

Event #: 25070002879

Date/Time: 7/01/25 @ 2115

Location: [REDACTED]

Beat: 521

Victim:

Suspect:

Synopsis:

[REDACTED]

Type: 20001 CVC

Event #: 25070002934
Date/Time: 7/01/25 @ 2115
Location: La Jolla Village Drive/ Executive Way
Beat: 115
Victim: [REDACTED]
Suspect:
Synopsis:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Type: PRT Assist
Event #: 25070003021
Date/Time: 7/01/25 @ 2353
Location: [REDACTED]
Beat: 323
Victim: [REDACTED]
Suspect: [REDACTED]
Synopsis:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Respectfully,

Ramiro Rodriguez
Lieutenant – SDPD

[REDACTED]
[REDACTED]

[<image001.png>](#)

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From: [Mccurrell, Kailey](#)
To: [Hall, Patrick](#)
Subject: Weekly Stats 6/30-7-3
Date: Tuesday, July 8, 2025 9:38:26 AM

Good Morning,

Here are my weekly stats:

- mentorship class 11-86
- 415DV (E25070002022): searched a female 10-16
- Pursuit (E25070002234): #3 to pursuit, went c4 while enrt, driver wasn't paying attention
- 11-31/HC (E25070002224): cover now with Homeland Security, went c4 while enrt
- department shoot
- 11-30 (E25070003600): 16 year old didn't want to go to school

Thank you,

Kailey McGurrell #1517
Police Officer
San Diego Police Department



Exhibit H

Call For Service

Event ID: **E25110024415**

Event Created: **11/18/2025 9:10:49**

AM

Call For Service

Event ID **E25110024415**
Event Created **11/18/2025 9:10:49 AM**
Dispatcher **SD8414 - [REDACTED]**
Call Source
Received **11/18/2025 9:10:49 AM**
Dispatched **11/18/2025 9:16:55 AM**
Arrived **11/18/2025 9:16:56 AM**
Cleared **11/18/2025 11:26:28 AM**
Location **303 S 47th St**
City, State, Zip **SAN DIEGO, CA 92113**
Beat **1446**
Grid
Jurisdiction **Lincoln Park - San Diego**
Map
X Coordinate
Y Coordinate
Longitude **-117.093432**
Latitude **32.702146**

Reporting Party
Address
City, State, Zip
Phone
Call type
Event Type
Reported Offense
Verified Offense

[REDACTED]

**INFORMATION FOR DISPATCHERS
INFORMATION FOR DISPATCHERS**

Tow Company
Vehicle
Vehicle License
Disposition
Priority
Classification

W

Agency **SDPD - San Diego Police Dept**
Cases

Officers

Notes 11/18/2025 09:16:37 ** LOI search completed at 11/18/25 09:16:37
11/18/2025 09:16:37 RP AT LOC FOR SURVEILLANCE UNTIL 1700 HRS // UNMARKED GRY NISS
PATHFINDER, BLK DODGE DURANGO, BLK DODGE CHARGER, SILV SUBURA ACCENT, NVY GRAND
DODGE CARIVAN // 5 ARMED AGENTS IN PLAIN CLOTHES // NO PD ASSIST NEEDED // RP REQ EVENT
TO BE 1022 AT 1700 HRS // WILL NOT CALL DISPATCH
11/18/2025 09:16:57 FYI SENT TO LD01
11/18/2025 09:17:13 ROUTED P4
11/18/2025 09:25:09 FYI SENT TO LDET
11/18/2025 11:17:40 ** Cross Referenced to Event # E25110024570 at: 11/18/25 11:17:40
11/18/2025 11:26:28 ** Event E25110024415 closed.

Call For Service

Event ID: **E25110024570**

Event Created: **11/18/2025 11:00:21**

AM

Call For Service

Event ID **E25110024570**
Event Created **11/18/2025 11:00:21 AM**
Dispatcher **SD8636 - [REDACTED]**
Call Source
Received **11/18/2025 11:00:21 AM**
Dispatched **11/18/2025 11:02:24 AM**
Arrived **11/18/2025 11:08:55 AM**
Cleared **11/18/2025 3:45:21 PM**
Location **350 47th St**
City, State, Zip **SAN DIEGO, CA 92102**
Beat **1446**
Grid
Jurisdiction **Lincoln Park - San Diego**
Map
X Coordinate
Y Coordinate
Longitude **-117.095388**
Latitude **32.707935**

Reporting Party
Address
City, State, Zip
Phone
Call type
Event Type
Reported Offense
Verified Offense
Tow Company
Vehicle
Vehicle License
Disposition **K**
Priority
Classification
Agency **SDPD - San Diego Police Dept**
Cases **25618092**

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
COVER NOW
COVER NOW

Officers

SD1982 - SALAZAR, ELVIS
SD1621 - VASQUEZ, ALFREDO
SD9932 - JUAREZ, YADIRA
SD1045 - GRIJALVA, YAND
SD2143 - CERVANTES, KALEB
SD1718 - POOL, THOMAS
SD7407 - RODRIGUEZ, EDUARDO
SD7520 - REDA, CHRISTIAN
SD1663 - VAZQUEZ, ROBERTO
SD9946 - BURCH, ADRIANA
SD1793 - SWALM, DANIEL
SD1586 - BASSON, WYATT-LEE
SD1759 - VILLANUEVA, ADRIAN
SD7858 - PEREZ QUINTERO, ANDRES
SD2102 - CYR, OWEN
SD2116 - KNIGHTEN, RONALD
SD7592 - MONTALBANO, NICHOLAS
SD6481 - DUMAPLIN, CARLO
SD6499 - MONTAYRE, PHILIPPE
SD1836 - MONTES ESPINOSA, JOSEPH
SD1849 - REED, KEVIN
SD6927 - JONES, CLINTON
SD2046 - TORRES, ANTHONY
SD2047 - BENNER, COLE

Call For Service

CFS Number: **E25110024570**

Date: **11/18/2025 11:00:21 AM**

SD2109 - VILLASENOR, MARCOS
SD2120 - GUERRERO, CHRISTIAN
SD5836 - ZDUNICH, MATTHEW
SD7671 - RIVEZZO, CARLY
SD7023 - COBB, MATTHEW
SD5388 - BAKER, JAMES
SD2177 - LAMBERT, CHRISTINA
SD6213 - GUTIERREZ, ARMANDO
SD1506 - AGUILAR, CHRISTIAN
SD9947 - LOPEZ, TIFFANY
SD7907 - GUTIERREZ, JUAN
SD2100 - CERERO, ALEJANDRO
SD7743 - ALLOS, JONATHAN
SD6384 - KELLINGTON, MICHAEL
SD1813 - GATES, WESLEY
SD6107 - ESCAMILLA, EDUARDO
SD6171 - GIBSON, KEVIN

Notes 11/18/2025 11:01:17 1793 ** LOI search completed at 11/18/25 11:01:17

11/18/2025 11:01:17 1793 [REDACTED]]HSI COVER NOW

11/18/2025 11:01:32 1793 [REDACTED]]Duplicate

Event:Loc: 350 47TH ST SD: @TROLLEY 47TH STREET, xstreets: PRIVATE RD/HARTLEY ST, [REDACTED] Alarm

Level: 0

11/18/2025 11:01:32 1793 [REDACTED]]RPS HAS 2 AGENTS AT THE TROLLEY AND LARGE GROUP IS FORMING AT LOC/ WHILE AGENTS ARE MAKING CONTACT WITH SUBJS/

11/18/2025 11:01:32 1793 [REDACTED]]End of Duplicate

Event data

11/18/2025 11:02:35 1793 [REDACTED]]CONTACTING TROLLEY FOR VISUAL

11/18/2025 11:02:46 1793 521S1 10-4

11/18/2025 11:02:53 1793 PM ENRT STANDING BACK

11/18/2025 11:03:09 1793 442S1 T4

11/18/2025 11:03:39 1793 GROUP OF 7 UPSET OVER TAKEDOWN // 1 CIVILIAN W/ HEAD INJ // NO AGENTS INJURED // 3 HSI VEHS 97

11/18/2025 11:04:23 1793 838J1 -- ROLLING CODE 3 ** 442S1 T4

11/18/2025 11:04:56 1793 [REDACTED]]HAS VISUAL ON MULTIPLE VEHS// AND 4 - 5 SUBJS NO ACTIVE FIGHT/

11/18/2025 11:04:59 1793 IN THE P/LOT // ACTIVE 415 // HAVE TARGET SUBJ DETAINED

11/18/2025 11:05:13 1793 838J1 -- DROP CODE

11/18/2025 11:06:35 1793 [REDACTED]]SO FAR 8 SUBJ ARE JUST WATCHING / HOMELAND SEC ARE WITH 1 1016 //

11/18/2025 11:06:37 1793 VERBAL 415 // YELLING // GROUP OF 8

11/18/2025 11:06:47 1793 ABLE1 -- VISUAL OF GROUP

11/18/2025 11:08:10 1793 4 VEHS 97 // BLU TACOMA WHT HOND HRV BLK CADILLAC // 8-10 MORE SUBJS

11/18/2025 11:09:08 1793 ABLE1 -- CROWD GETTING UNRULY

11/18/2025 11:09:27 1793 PHYSICAL 415

11/18/2025 11:09:53 1793 ABLE1 -- EMERGENCY TONE **

Call For Service

CFS Number: **E25110024570**

Date: **11/18/2025 11:00:21 AM**

11/18/2025 11:10:05 1793 ABLE1 -- PD DETAINING PRIMARY AGGRESSOR
11/18/2025 11:10:14 1793 442S1 -- T4 ON CA/56876DV
11/18/2025 11:11:08 1793 814J1 -- 1 DETAINED
11/18/2025 11:11:21 1793 814J1 -- VERBAL NOW // CALMING DOWN
11/18/2025 11:12:12 1793 810PT1 -- 1141 23YO MALE HEAD INJURY
11/18/2025 11:13:04 1793 [REDACTED] IRP REQ
MEDICS FOR UNK SUBJ // DID NOT GIVE FURTHER DETAILS // RP HU // MEDICS REQ CB WHEN
CLEARED
11/18/2025 11:13:11 1793 MEDICS T4 CLR IN
11/18/2025 11:14:38 1793 825J1 -- GROUP 10-12 // 2 HSI AGENTS ASSAULTED // 2 SUSPS
11/18/2025 11:14:38 1793 OUTSTANDING // HSI WILL DETAINED // PD HANDLING CROWD
11/18/2025 11:14:38 1793 CONTROL
11/18/2025 11:14:48 1793 438K1 -- WORKING ON GETTING HSI OUT OF AREA
11/18/2025 11:15:15 1793 438K1 -- FALCK 19 // FALCK 26
11/18/2025 11:15:19 1793 810PT1 -- LADDER 12
11/18/2025 11:15:44 1793 523J1 -- NO INJS TO SDPD OFCRS
11/18/2025 11:15:57 1793 438K1 -- XPORTING HSI 1016 TO HSI VEH
11/18/2025 11:17:09 1793 810PT1 -- MALE W/ HEAD INJ BY MED 26
11/18/2025 11:17:40 1793 ** Cross Referenced to Event # E25110024415 at: 11/18/25 11:17:40
11/18/2025 11:20:17 1793 438K1 -- MEDIA 97 // L1 T4
11/18/2025 11:20:19 1793 FYI SENT TO LD01
11/18/2025 11:21:26 1793 430L -- HSI AGENTS LEAVING // PD TO FOLLOW AND LEAVE AREA
11/18/2025 11:24:08 1793 438K1 -- MALE W/ HEAD INJURY WALKED AWAY
11/18/2025 11:24:38 1793 438K1 -- HSI AGENTS CLR FROM SCENE
11/18/2025 11:31:56 1793 438K1 -- COLLECTING FI'S FOR HSI
11/18/2025 11:33:12 1793 526J1 -- 1016 VEH KEYS HAVE BEEN RETURNED
11/18/2025 11:35:15 1793 ** LOI search completed at 11/18/25 11:35:15
11/18/2025 11:36:51 1793 CASE # PULLED FOR USE OF FORCE
11/18/2025 11:36:51 1793 ** Case number 25618092 has been assigned to event E25110024570
11/18/2025 11:58:15 1793 ** VEH search completed at 11/18/25 11:58:15
11/18/2025 11:58:29 1793 ** Tow Request Rotational Service requested for AUTORETURN -- code is 11-82 -
Private
11/18/2025 11:58:29 1793 ** TOW REQUEST #205376 initiated at 11/18/2025 11:58:29 AM from trc12 for
E25110024570
11/18/2025 11:58:29 1793 ** TOW REQUEST #205376 has been closed :
11/18/2025 11:58:29 1793 >>>> by: 8542 at 11/18/2025 11:58:29 AM on terminal: trc12
11/18/2025 11:58:34 1793 Tow Request Update- TowID: 20251118A0029 Status: DISPATCHED Tow
Company: Allied Gardens Towing
11/18/2025 11:58:34 1793 Tow Request Created TowID: 20251118A0029
11/18/2025 12:18:15 1793 ** LOI search completed at 11/18/25 12:18:15
11/18/2025 12:20:08 1793 ** TOW REQ IN ERROR **
11/18/2025 13:06:55 1793 C4, FI'S TAKEN FROM ALL PARTIES WHO CLAIMED TO BE INVOLVED WITH
HSI INCIDENT. ALL INFORMATION WAS GIVEN TO SPECIAL AGENT IN CHARGE [REDACTED] AT FEDERAL
BLDG DOWNTOWN. [REDACTED] ADVISED HE WILL HANDLE INCIDENT AND CONTACT ALL PARTIES
INVOLVED. HSI SUSPECT VEHICLE WAS PARKED AT TROLLEY STATION AND KEYS HANDED OVER TO
HSI.
11/18/2025 13:42:26 1793 blue team entry - bwc
11/18/2025 13:42:31 1793 ** Event E25110024570 closed.
11/18/2025 14:30:30 1793 .

Call For Service

CFS Number: **E25110024570**

Date: **11/18/2025 11:00:21 AM**

11/18/2025 14:42:29 1793 ** LOI search completed at 11/18/25 14:42:29
11/18/2025 14:42:30 1793 ** Event E25110024570 has been reopened at: 11/18/25 14:42:30
11/18/2025 14:42:36 1793 ** LOI search completed at 11/18/25 14:42:36
11/18/2025 15:45:21 1793 ** Event E25110024570 closed.



Hi there. Wanted to pass this incident along. It doesn't involve us responding to a fed agency that was conducting immigration enforcement directly, but it is likely to prompt questions.

Tuesday morning, ten HSI agents were in three unmarked vehicles doing surveillance for immigration-related reasons near or around the 47th Street trolley.

A man who tracks ICE activities noticed the surveillance and began following the agents around. The agents ultimately confronted the individual at the 47th Street trolley station and he ran off. HSI agents did not pursue the man, but other people associated with the man stayed and an altercation occurred.

Then eight to 10 more people arrived at the trolley to help protest the HSI action. ABLE reported the crowd was now getting unruly and becoming physical. The protestors did something to block the exit route (like parked their vehicles at the bottleneck into the lot).

SDPD officers re-responded and helped separate the protestors from the agents. It's unclear exactly how many officers responded, but they arrived about 11:08 am.

Two SDPD officers detained one of the protestors who was suspected of slapping an HSI agent.

That person was turned over to HSI, because the HSI agent was the victim and they wanted to pursue federal charges.

That detainee's truck was blocking the entry/exit to the lot. With his permission, SDPD moved his truck and legally parked it.

HSI used force on at least one of those people resulting in a head injury, although it's unclear how serious it was. Medics were called, and that person ultimately walked away.

HSI called a cover now just after 11 am and officers from MidCity, Southeastern, and Central start responding.

However, MTS has cameras and reported they could see no active fight, but there were four to eight onlookers. ABLE also went overhead.

Things started to settle before SDPD officers arrived and officers started waving of.

From: [Martinez, Denise](#)
To: [REDACTED]
Subject: RE: 47th Street station
Date: Tuesday, December 9, 2025 1:55:00 PM
Attachments: [image001.png](#)

Good afternoon,

Per SB 54 we the San Diego Police Department do not aid and abet in immigration matters. In this email I have attached a summary of SB 54. For more details on SB 54 feel free to look up the things that SDPD can and can not do. I hope you find this material useful. I hope this has clarified any questions you may have had.

SB 54 prohibits SDPD from:

- Investigating, detaining, or arresting people based solely on immigration status, with very limited exceptions.
- Participating in federal immigration enforcement operations or task forces that focus on immigration.

SB 54 allows SDPD to:

- Respond to public safety concerns or criminal activity involving California law, even if immigration agents are present.
- SDPD's involvement with federal immigration enforcement is strictly limited to preserving public safety when called for emergency assistance; SDPD cannot enforce immigration law during these operations.

Other legal considerations:

- Federal law prohibits local agencies from interfering with lawful actions by federal agents.
- SDPD policy requires officers to assist any law enforcement officer — local, state, or federal — if they appear to need immediate help.

Respectfully,
Denise Martinez

Community Relations Officer
San Diego Police Department

[REDACTED]
[REDACTED]
[REDACTED]



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From: [REDACTED]
Sent: Thursday, December 4, 2025 9:10 PM
To: Martinez, Denise <denisem@pd.sandiego.gov>
Subject: [EXTERNAL] 47th Street station

Dear Officer Denisem,

As a Resident of San Diego, I have just contacted my Council member and the Mayor's Office regarding the Report in The Times of San Diego about SDPD officers aiding and abetting an ICE abduction of a resident at the 47th St Trolley Station. I was unable to find contact information for contacting the Chief of SDPD, so I am attempting to bring my concerns to you as a representative of the department in this area of the City.

From the inception of this current administration in the White House our collective Civil & Constitutional Rights have been violated and dismissed as though they never existed. Most horrifying for many of us are the violent, illegal ICE abductions and imprisonments of residents with no due process and no representation!

Even Our Elected Officials as well as State Health Officials have been refused entry to inspect the conditions & treatment of detainees, in this country or out of the country.... it's therefore reasonable to assume, there is something ICE detention centers are hiding about their operations.

It is further evident from the media coverage of ICE agents in action, that they are intent is willful brutality... toward women, children and elderly regardless of innocence or circumstance.

As you no doubt know, the majority of San Diegans do not support brutality or illegal abductions of our residents. I might also add that if SDPD is to remain reputable and trusted in the eyes of it's residents,

it needs to prove that Trust by at the very least, by not aiding and abetting these federal thugs.

Kindly asking for Your Understanding of the needs of our communities to have faith in SDPD.

Sincerely, [REDACTED]