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Electronically FILED by  
Superior Court of California,  
County of Los Angeles  
8/30/2024 5:28 PM  
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Executive Officer/Clerk of Court,  
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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF LOS ANGELES**

10 STOP LAPD SPYING COALITION,  
11 Petitioner,

Case No. **24STCP02825**

12 v.

**VERIFIED PETITION FOR WRIT OF  
MANDATE**

13 THE CITY OF LOS ANGELES,  
14 Respondent.

CALIFORNIA PUBLIC RECORDS ACT

15 **INTRODUCTION**

16 The Los Angeles Police Department (LAPD) has a position called “Senior Lead Officer” (SLO)  
17 whose purported role is to serve as a “liaison” to the public for “community policing.” LAPD’s website  
18 has long displayed the names, photographs, phone numbers, and area assignments of officers in this role.  
19 And LAPD previously published lists of all SLOs in response to records requests. So Petitioner sent  
20 LAPD a request for such a list in June 2023. Over a year later, LAPD refuses to publish this list.

21 **FIRST THINGS FIRST**

- 22 1. Petitioner is a local activist group and Respondent is a local government.  
23 2. This Court has jurisdiction under Government Code sections 7923.000 through 7923.005 and  
24 7923.100 through 7923.115 and Code of Civil Procedure sections 1085.  
25 3. Venue is proper in this Court under Government Code section 7923.100.

26 **ALLEGATIONS**

- 27 4. On October 18, 2022, LAPD published a list of all SLOs (a total 242) with their serial numbers.  
28

1 A copy of this list is attached as **Exhibit A**.

2 5. On February 13, 2023, Petitioner sent LAPD this request: “Please share a list of all current  
3 Senior Lead Officers with their serial numbers and area assignments.”

4 6. On July 3, 2023, LAPD responded saying that the “the information you are requesting can be  
5 found on the Department website.” The response directed Petitioner to visit LAPD’s “Find Your Local  
6 Police Station” page (<https://www.lapdonline.org/find-your-local-police-station/>), “select the Patrol  
7 Division of your choice,” and “a link to a SLO Map listing the officers will be provided.”

8 7. The SLO maps on LAPD’s “Find Your Local Police Station” page are largely out of date and  
9 incomplete. For example, one map (a copy of which is attached as **Exhibit B**) is dated 2021, others were  
10 published in 2022, and some links to the maps are dead. Even the maps that are available cannot be  
11 browsed on a single page or searched or sorted by officer. Instead, one must visit several dozen pages to  
12 find the area-specific maps and then browse each map to identify SLOs among several officers listed. In  
13 contrast, the list that LAPD produced in October 2022 names all SLOs in a single list.

14 8. On July 18, 2023, Petitioner replied to LAPD’s response: “We understand that the website  
15 provides this information in a piecemeal fashion, across approximately 172 different police station  
16 pages. But if LAPD possesses a single list then that would be responsive to our request. You generated a  
17 spreadsheet of all SLOs previously here: <https://lacity.nextrequest.com/requests/22-7683>. In addition,  
18 the maps on the website appear to be very out of date, inaccurate, or unavailable. We noticed some dated  
19 2019 along with map links that lead nowhere. Some of the maps list SLOs who have retired from the  
20 department, and others do not indicate SLOs who were assigned after the map was published.”

21 9. On July 21, 2023, LAPD responded that it “received your message regarding the Department’s  
22 response to your request” and would “evaluate your concerns and respond as soon as practicable.”

23 10. On August 28, 2023, Petitioner wrote: “Please let us know what is taking so long with this  
24 request. You have previously generated the exact list we are requesting. And you appear to agree that  
25 this information should be public.”

26 11. On January 27, 2024, Petitioner wrote: “It’s now been five months since we asked you to provide  
27 an update on this request. As we noted then, LAPD ‘previously generated the exact list we are  
28

1 requesting' and your earlier messages 'appear to agree that this information should be public.' We are  
2 prepared to seek a writ of mandate from the Superior Court but strongly prefer to avoid litigation.”

3 12. On March 17, 2024, Petitioner wrote again to LAPD: “It’s now been seven months since we  
4 asked you to provide an update on this request and one month since the final date we gave you to  
5 produce these records. You already indicated that this information should be public.”

6 13. On May 24, 2024, Petitioner wrote again to LAPD: “It’s now been nine months since we asked  
7 you to provide an update on this request and eleven months since we filed this request. You already  
8 indicated that this information should be public. Please produce these records immediately.”

9 14. LAPD has not responded to Petitioner since July 2023. Nor has LAPD produced the requested  
10 records.

11 **CAUSE OF ACTION**

12 Respondent is violating the California Public Records Act.

13 **REQUEST FOR RELIEF**

14 Petitioner respectfully requests that:

- 15 1. This Court issue a writ of mandate compelling disclosure of all responsive records.
- 16 2. The Court enter an order awarding Petitioner its attorneys’ fees and costs; and,
- 17 3. The Court award any further relief as is just and proper.

18 DATED: August 30, 2024

Respectfully submitted,

19 LAW OFFICE OF SHAKEER RAHMAN  
20 LAW OFFICE OF CATHERINE CHOI

21 By: /s/ Shakeer Rahman

22 Attorney for Petitioner  
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1 **DECLARATION OF HAMID KHAN**

2 I, Hamid Khan, declare that the following is true and correct upon penalty of perjury:

3 1. I am the lead coordinator of the Stop LAPD Spying Coalition. I am authorized to make this  
4 declaration on the Stop LAPD Spying Coalition's behalf.

5 2. I have read the VERIFIED PETITION FOR WRIT OF MANDATE. The facts stated in it are  
6 either true and correct of my own personal knowledge, or I am informed and believe that the facts are  
7 true and correct and on that basis I allege them to be true and correct.

8 This verification was executed on August 30, 2024, in Los Angeles, California.

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11 HAMID KHAN  
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**EXHIBIT A**

EMP_NAME	EMP_FULLNAME
36072	AISPURO, JESUS
38828	ALTAMIRANO, JOHNNY
39907	ALVAREZ, CESAR
32151	BENAVIDEZ, ROBERT
34620	BRUNER, ERIK
34462	DIAZ, CARLOS
39042	DOMINGUEZ, CUITLAHUAC
38627	EICK, CHRISTOPHER
31981	GADSBY, RICHARD
39393	GARCIA, CRYSTAL
36795	GARCIA, SUSAN
36888	GONZALEZ, CESAR
41018	GONZALEZ, SHIRMIKA
36380	GUAJARDO, MARCO
38355	GUILLEN, LEOVARDO
47027	JEDINAK, ALBERT
37341	JONES LINTON, JAMILAH
34472	LOPEZ, ADRIAN
38512	LOPEZ, CESAR
40988	MATA, HEATHER
37597	MILLER, JARED
39063	PEREZ, JOHN
41081	PEREZ, OMIR
31373	PETEQUE, NORMA
35545	PINELL, LUIS
35367	POEPKE, JENNIFER
39013	QUINTANILLA, REYNA
25832	SANCHEZ, SERGIO
44631	SILAS, RONNI
40010	YNSFRAN, WILLIAM
43994	ADLER, ZACHARY
42144	ALANIZ, STEVEN
33652	BALLESTEROS, RICARDO
32729	BLAKE, LANCE
31646	CORDOVA, DAVID
40675	DANTZLER, DE'ANTRAYE
40093	FUENTES, HUGO
40034	GRUTTER, YOLANDA
37443	HELPER, MONICA
37541	LEON, JOSE
37247	LEYVA, ARMANDO
34235	NAVARRETE, LUIS
38916	O BRIEN, IAN
37200	PADILLA, MARIA
31685	PARKER, GREGORY
36341	RALPH, STEVEN

39174	RAMIREZ, JAVIER
38340	ROSAS, RUBEN
37713	SANCHEZ, KENNETH
33751	SMITH, SHAWN
39180	SOLORZANO, REYNALDO
36899	SOUTHERN, ELIZABETH
33288	VALDEZ, ALBERT
31265	VALDEZ, HUGO
37159	BOTELLO, MARIO
37098	BRAWNER, GERALDINE
26110	CASINI, OSCAR
38790	CUELLAR, BRADY
27677	DELVALLE, DANIEL
34920	DINSE, CHARLES
37931	FERARA, NICKOLAS
33554	FRIESENHAHN, MICHAEL
36213	GARCIA, DANIEL
R6643	GREEN, MARK
36939	GRIEGO, JESUS
37105	GUTIERREZ, CARMEN
38048	KEENAN, KEVIN
37795	LOPES, JOSEPH
38192	LOPEZ, FRANCISCO
36990	MAGANA, ARMANDO
34936	MARQUEZ, HECTOR
38813	MONTOYA, KRISTINA
40733	NAVA, GONSALO
33059	NICHOLS, STEPHEN
40737	REINER, JUSTIN
38066	ROYBAL, GABRIEL
39066	RUIZ, GABRIEL
31256	SALAZAR, SAM
37662	SANTIZO, LEONEL
41175	SAUER, THOMAS
41751	TARANGO, STEPHANIE
40795	WEDA, ANGELICA
35947	ZAMORA, SANDRA
42921	AZARYAN, JOHN
44604	BAKER DUNLAP, BRENT
38835	CARTER, JOSEPH
44575	CHAMBERS, JOHN
34626	CHERRETTE, JAMES
36295	COLBY, KENNETH
35472	CORRAL, EFREN
39869	FLORES, LUIS
36892	HAMAOKA, TYSON
37638	HURTADO, ANTONIO

40824	LEE, JAE
39506	LIEM, DANIEL
34655	MEJIA, MIGUEL
42517	MESSMORE, CORY
35379	MILLER, PAUL
42408	MONZON, JESSYKA
37748	MORENO, JOSE
35382	NUNEZ, STEVEN
39607	OJEDA, JONATHAN
37498	OJEDA, LUIS
36393	OJEDA, PETE
38338	PEREZ, ERIC
38339	RENTERIA, ADAN
44028	REYNOSO, GABI
39266	RODRIGUEZ, YESENIA
36103	SOLORIO, ROBERT
38928	ALARCON, MIGUEL
39796	BAKER, CHRISTOPHER
40757	BREWER, JUSTIN
38616	BROWN, DANIEL
36005	CANIZALES, ROBERT
31214	CONTRERAS, EFRAIN
32068	DOMINGUEZ, FRANK
30991	DUVALLY, JENNIFER
34636	FERNANDEZ, MICHAEL
38683	FLORES, ALFONSO
35538	FORT, JACKIE
38133	GARCIA, ANDREW
32272	GARNER, NICHOL
38690	GUERRERO, JORGE
36270	GUTIERREZ, WILLIAM
41068	JARAL, YOLOTSI
38646	MARQUEZ, JASON
36823	MARTINEZ, FRANCISCO
36818	MCNAMEE, KARI
34595	NGUYEN, RYAN
37881	PECH, CHRISTOPHER
33802	PEREZ, ROGELIO
35464	POTTER, AIRAM
35738	RODRIGUEZ, HEBEL
30735	SANCHEZ, RALPH
31322	SAWAMURA, CAROL
32514	SOLTER, ERIK
34024	WALIA, PRAVIND
40236	ZAMBRANO, JORGE
37285	ACOSTA, ADRIAN
39318	ALLEN, JAMES



42616	BENITEZ, ANGELICA
30930	CAMACHO, GUSTAVO
35080	CASTANEDA, SOPHIA
32929	CEJA, JUAN
37123	CERVANTES, GABRIEL
33817	CHO, HARRIS
34785	COATS, ELVA
40760	COHEN, BRETT
36373	CONTRERAS, CESAR
40718	DIMICH, KRISTIN
47015	DINAPOLI, ENRICO
33021	GARCIA, FRANK
37530	GOOSBY, GRANT
37868	HERNANDEZ, ERICK
32285	JORDAN, PAUL
34713	KIRK, MATTHEW
32465	LANDRY, CHRISTOPHER
38454	LARA, GEORGE
37400	MARTINEZ, JORGE
32384	MARTINEZ, ROBERT
26586	MUNOZ, JULIAN
41694	ORTEGA, LUIS
40541	RAVIOL, JOSEPH
34819	SABRA, HAISSAM
34243	SAENZ, ANTHONY
31383	SANTIN, IRIS
36695	SEIBERT, BRANDON
37142	SHORTLE, MELODY
41595	SMYTH, TAYLOR
27546	STEWART, ANGELO
40547	TODD, JERRY
25384	VALDEZ, CARLOS
37556	VAZQUEZ, ALBERTO
37887	WALES, WILLIAM
35834	WHEELER, MARK
38667	AVERAIMO, VINCENZO
38834	BONFFIL, DAMARIS
33655	BRAENDLE, PATRICIA
36421	BRAVO, ADRIANA
39688	CARDONA, TOM
32914	DELATORI, KRISTAN
39082	EVANS, DELMY
38137	GUTIERREZ, MANUEL
30627	LAVENSON, JAMES
37746	MASANGKAY, REYNALDO
36176	MCPHEETERS, CHRISTOPHER
39512	MORENO, HUMBERTO

37348	MUNOZ, JORGE
38061	PADILLA, VERONICA
40380	PAGULAYAN, DANTE
36560	PARKER, JOHN
37005	RODRIGUEZ, FRANCISCO
35828	SCOGGINS, DARYL
37714	SEWELL, ROBERT
34488	SMITH, ROSA
40403	SOSA, CAMILLE
41183	TALMAN, TIMOTHY
34305	TSAI, EDWARD
40068	VEGE, CHRISTOPHER
38873	WAGNER, JEREMY
30020	YANEZ, ROBERTO
36360	YBARRA, DERRICK
34208	ZEIGLER, MATTHEW
33107	AHEDO, GABRIEL
35755	CALOCA, GLORIA
37373	CARLSON, GEOFFREY
39958	CHANG, TONY
34218	DAO, DUC
38887	DELBAR, KURTIS
47017	ELORRIAGA, MANUEL
39270	FERNANDEZ, JOSE
38741	GETTINGER, DOUGLAS
35059	GRAS, SUSANNE
38638	HELMSTETTER, ERIK
40101	HERNANDEZ, HAINER
37582	HERNANDEZ, JUAN
37835	HERRERA, CINDY
35351	HOGG, MELL
34863	HUERTA, RICARDO
37640	IBARRA, JOSE
32511	JOSEPH, DEON
39223	JUAREZ MARCIAL, EFRAIN
44154	LOPEZ VEGA, JOSUE
39004	LOPEZ, JACQUELINE
34796	MARTIN, ANTONIO
37797	MARTINEZ, ROBERT
35378	MEDINA, YVONNE
33682	MEJIA, ANA MARIA
31180	MILLS, OWEN
30116	MUNGUIA, ADRIANA
37051	MUTHER, STEPHEN
31681	NUA, MALIGI
39361	PITONES, HUMBERTO
39945	RICE, KYLE

32895	RODITIS, SPIRO
44168	ROMERO, ANTHONY
32825	SCHUBE, ANNA
31934	SELLERS, PHILLIP
42913	TATUM, BRAXTON
38074	WHITE, BRIAN
39471	WHITEMAN, TYLER
38168	WOLFCHIEF, JUSTIN

**EXHIBIT B**

# Van Nuys Area - Basic Car Area

## August 2021



**9SL5**  
**SLO LYNN WHITEY**  
 37011@lapd.online  
 (818) 731-2556



**9SL19**  
**SLO MICHAEL PEREZ**  
 35569@lapd.online  
 (818) 731-2566



**9SL23**  
**SLO GEORGE LARA**  
 38454@lapd.online  
 (818) 731-2557



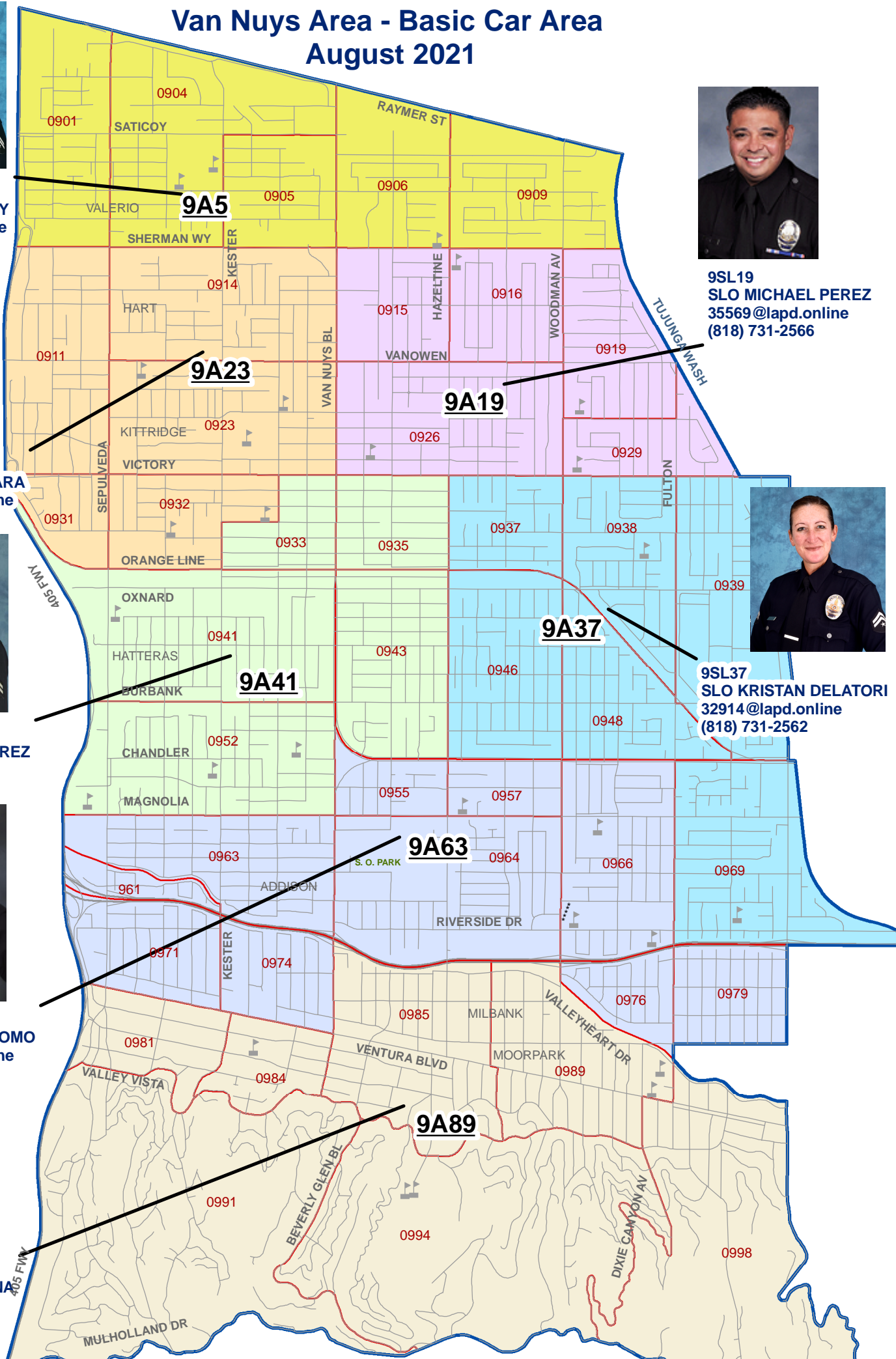
**9SL41**  
**SLO JOEL GUTIERREZ**  
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**9SL63**  
**SLO MARIANA ROMO**  
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**9SL89**  
**SLO JOSE SALDANA**  
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**9SL37**  
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