

JAN 13 2026

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

GENERAL JURISDICTION

-----X	)	
JOSHUA K. KATZ	)	CASE NO.:
<i>Petitioner,</i>	)	
v.	)	VERIFIED PETITION FOR WRIT OF
	)	MANDATE
	)	
CITY OF SIMI VALLEY	)	
CLERKS OFFICE; SIMI	)	
VALLEY CITY ATTORNEYS	)	
OFFICE; SIMI VALLEY POLICE	)	
DEPARTMENT; and CITY OF SIMI	)	
VALLEY POLICE DEPARTMENT	)	
RECORDS BUREAU,	)	
	)	
<i>Respondents.</i>	)	
-----X	)	

**Introduction**

Now comes Petitioner *pro se*, JOSHUA K. KATZ (hereinafter "Petitioner"), and files his Petition for Writ of Mandate against the Respondents, CITY OF SIMI VALLEY CLERKS OFFICE (hereinafter "Clerk"), SIMI VALLEY CITY ATTORNEYS OFFICE (hereinafter "CAO"), SIMI VALLEY POLICE DEPARTMENT (hereinafter "SVPD"),

1 and the CITY OF SIMI VALLEY POLICE DEPARTMENT RECORDS BUREAU  
2 (hereinafter "Bureau"), and in support thereof, states as follows:

3 **Jurisdiction and Venue**

4 1. This is an action seeking a Writ of Mandate to compel the Clerk, CAO,  
5 SVPD, and Bureau to fulfill their duties by providing Petitioner a true and exact copy of  
6 all public records related to Petitioner's 7/7/2025 police encounter, as required by Gov.  
7 Code § 7920.000, et seq., AKA the California Public Records Act (CPRA), and  
8 supporting law.

9 2. This action additionally seeks to compel Respondents to provide any  
10 member of the public access to all non-exempt Body-Worn-Camera (BWC) video upon  
11 proper submission of CPRA requests for such public records, henceforth.

12 3. This Court has jurisdiction under to grant Writs of Mandate. California  
13 Code of Civil Procedure, Chapter 2, §1085(a).

14 4. Petitioner is a Simi Valley, California resident and a member of the public.

15 5. The venue is proper in the Ventura County Circuit Court, because this  
16 action concerns the release of public records created, kept, and controlled by the  
17 Respondents, who fall under the judicial jurisdiction of this court.

18 6. The Respondents are the proper entities against whom the Petitioner  
19 should seek action because they all acted to process and deny Petitioner's CPRA  
20 request for public records on 7/8/2025 in Simi Valley.

21 **Statement of Facts**

22 7. While driving a vehicle, Petitioner was stopped and detained around

1 11:45pm on 7/7/2025 by members of the SVPD. The traffic stop was initiated by Officer  
2 Royce, #5003 (Royce) of the SVPD, by reason of the vehicle not having a standard  
3 license plate displayed on the rear mounting bracket, pursuant to California Vehicle  
4 Code § 5200(a).

5 8. Petitioner immediately made Royce aware of a California DMV-issued  
6 Temporary Operating Permit, properly displayed in the front windshield. Upon  
7 information and belief, Royce stated, "I haven't inspected it yet" and demanded  
8 Petitioner's driver's license.

9 9. Petitioner protested relinquishing his driver's license and asserted his  
10 Fourth Amendment right to remain secure in his papers. Petitioner also questioned the  
11 lawfulness of the detainment, stating no crime had been committed because a  
12 temporary permit replaces the need for plates. California Vehicle Code § 5202(a).

13 10. Petitioner's temporary permit was current and valid, even though  
14 Petitioner had not yet received the permanent Disabled Veteran (DV) license plates.

15 11. Upon information and belief, Royce threatened use of force by arrest for  
16 "obstruction", citing California Penal Code § 148(a)(1), if Petitioner did not surrender his  
17 driver's license.

18 12. Petitioner immediately surrendered his driver's license to Royce, along  
19 with insurance papers and registration papers, stating his compliance was under protest  
20 and was only surrendered due to threat of use of force by arrest.

21 13. Two other members of the SVPD, Officer Yi and Officer Watson, were  
22 also present and interacted with the Petitioner. The Petitioner requested a supervisor,

1 and Sgt. Brennan responded in that capacity as the fourth SVPD officer at the traffic  
2 stop.

3 14. Petitioner stated to multiple responding officers that he was a disabled  
4 veteran applying for DV plates and that the DMV requires such applicants to surrender  
5 their current plates and to display the temporary permit instead as part of that process.

6 15. All four SVPD members had body-worn cameras (BWC) which were  
7 active and recorded elements of the traffic stop. Upon Sgt. Brennan's arrival, Petitioner  
8 verbally made it known he was recording video on his vehicle dashcam and personal  
9 cell phone. Upon information and belief, Sgt. Brennan replied, "Okay. So am I."  
10 Petitioner also heard the active recording digital beeps from multiple BWC devices, and  
11 colored lights which indicated those BWC devices were actively operating.

12 16. Petitioner stated to all four Officers that he believed the stop, prolonged  
13 detainment for the purpose of SVPD members coercing Petitioner into releasing his  
14 identification, and threat of arrest when Petitioner had not committed any violation or  
15 crime, were all unlawful.

16 17. Upon information and belief, Petitioner was told by the SVPD members  
17 that there would be no "citation for anything," and that Petitioner's "license status and  
18 everything was fine."

19 18. Petitioner informed the SVPD members that his military combat-related  
20 PTSD was triggered due to the stop.

21 19. Petitioner stated intentions to file a complaint and possible lawsuit but  
22 offered Royce a chance to apologize instead. Royce refused to apologize.

1           20.    Upon information and belief, Sgt. Brennan stated for Petitioner to “Have a  
2   good night, sir.” This remark was understood by Petitioner to be the end of the traffic  
3   detainment, and any related investigation by the SVPD, which lasted approximately  
4   twenty-two (22) minutes from start to finish.

5           21.    Though the Petitioner offered for the temporary permit to be examined by  
6   any SVPD members present, at no point in the traffic stop did any SVPD member  
7   examine the temporary permit other than a cursory glance from outside Petitioner’s  
8   lawfully operated and owned vehicle.

9           22.    At no time during the traffic stop was Petitioner placed under arrest, cited  
10   for any violation, nor issued or given any verbal or written warning.

11          23.    The next morning, on 7/8/2025, Petitioner verbally requested from Bureau  
12   access to all police BWC video which was created during the traffic detainment.  
13   Petitioner recorded cellphone video of his interaction with a female Records Clerk (RC);  
14   an agent for the Respondents. Upon information and belief, she stated, “none of that is  
15   covered under Freedom of Information Act” and “in order to get bodycam you would  
16   need to file a subpoena.” Upon information and belief, Petitioner further asked, “In other  
17   words: you do not release bodycam unless you’re ordered to do it through a  
18   subpoena?” The RC confirmed that was the policy.

19          24.    Petitioner stated intent to file a FOIA to further attempt access to the BWC  
20   video. RC advised Petitioner to file a CPRA request instead and advised Petitioner on  
21   the Respondents’ submission process, because FOIA is for federal entities and CPRA  
22   is for state and city entities.

1           25.     RC provided Petitioner with the Police CAD report for the traffic stop.  
2     Upon information and belief, RC stated that any CPRA request would result in only that  
3     document being released, not any BWC video.

4           26.     A few minutes later, Petitioner submitted a CPRA request for records  
5     related to the stop, including BWC video. The request form was given to Deputy City  
6     Clerk Angelica Aguirre, another agent for Respondents, and she sent an email  
7     confirmation of receipt. See Exhibit A, Appendix at i.

8           27.     Petitioner filed a complaint with SVPD on 7/10/2025 requesting an  
9     investigation into any wrongdoing by SVPD officers during the traffic stop. SVPD  
10    responded that the complaint was received on 7/30/2025. On 7/31/2025 SVPD  
11    concluded the complaint by stating its officers "did not act outside the policy or the law.  
12    See Exhibit B, Appendix at ii.

13          28.     On 7/17/2025, Petitioner received a denial of his CPRA request from  
14    Respondents. The letter stated: "per Gov Code 7923.600 the items requested for  
15    release are exempt from disclosure." See Exhibit C, Appendix at iii.

16          29.     Petitioner called Respondents on the phone to protest the denial and was  
17    told to send an email. Petitioner did send an email to Respondents, in which Petitioner  
18    asked for an explanation as to why the requested records were believed by  
19    Respondents to be exempt and requested to appeal the decision.

20          30.     Respondents sent Petitioner a reply, stating, "Per our City Attorney's  
21    Office, the items requested for release are exempt from disclosure per Gov Code

1 §7923.600. Also, the City of Simi Valley does not have a process for appealing this  
2 decision.” See Exhibit D, Appendix at iv.

3 31. Petitioner attempted to contact the CAO multiple times to attempt to obtain  
4 the requested public records. No reply has been received as of the filing of this action.

5 32. Petitioner contacted his City Council representative, Council Member  
6 Rocky Rhodes (“RR”) to attempt to obtain the public records. RR responded, “I will  
7 follow up with our city attorney on what practices and protocols are for sensitive records  
8 like body cam footage” and that he “will continue to follow up”, with Petitioner. See  
9 Exhibit E, Appendix at v. Petitioner responded, but no other reply has been received  
10 from RR as of the filing of this action.

#### 11 **Applicable Law**

12 33. A Writ of Mandate is recognized as remedy “to compel the performance  
13 for an act which the law specifically enjoins, as a duty resulting from an office” “or  
14 station.” California Code of Civil Procedure § 1085(a).

15 34. The First Amendment of the US Constitution guarantees the fundamental  
16 “right to petition the government for a redress of grievances.”, which includes the right to  
17 file civil claims against the government in courts. U.S. Const. amend. I.

18 35. The California Constitution also grants the public right to a redress of  
19 grievances. CA Const. § 3(a).

20 36. The California Public Records Act (CPRA) codifies the right of every public  
21 member to inspect public records in any state or local agency’s custody or control. Gov.

Code § 7920.000, et seq. The CPRA is modeled after the Freedom of Information Act. 5  
U.S.C. § 552, et seq.

37. The CPRA defines a “member of the public” as “any person other than a  
member, agent, officer, or employee of a federal, state, or local agency who is acting  
within the scope of that membership, agency, office, or employment.” Gov. Code §  
7920.515.

38. The CPRA states that “public agency means any state or local agency.”  
Gov. Code § 7920.525.

39. The CPRA defines “public record” as “any writing containing information  
relating to the conduct of the public’s business prepared, owned, used, or retained by  
any state or local agency regardless of physical form or characteristics.” Gov. Code §  
7920.530.

40. The CPRA defines “writing” as “any handwriting, typewriting, printing,  
photostating, photographing, photocopying, transmitting by electronic mail or facsimile,  
and every other means of recording upon any tangible thing any form of communication  
or representation, including letters, words, pictures, sounds, or symbols, or  
combinations thereof, and any record thereby created, regardless of the manner in  
which the record has been stored.” Gov. Code § 7920.545.

41. The CPRA declares that “access to information concerning the conduct of  
the people’s business is a fundamental and necessary right of every person in this  
state.” Gov. Code § 7921.000. The CPRA provides the public access with two key  
rights: (1) to inspect public records and (2) to receive copies of available public records.



1           42.    Petitioner has a "Right to Inspect Public Records" and "Public records are  
2 open to inspection at all times during the office hours of the state or local agency and  
3 every person has a right to inspect any public record," Gov. Code § 7922.525(a).

4           43.    "Voluntary disclosure" of these public records are required by agencies  
5 such as the Respondents and their agents. Gov. Code § 7921.500.

6           44.    "When a member of the public requests to inspect a public record" "the  
7 public agency, in order to assist the member of the public" "shall do all of the following:"  
8 "(3) Provide suggestions for overcoming any practical basis for denying access to the  
9 records or information sought." Gov. Code § 7922.600(a)(3).

10          45.    "Whenever it is made to appear, by verified petition to the superior court  
11 of the county where the records or some part thereof are situated, that certain public  
12 records are being improperly withheld from a member of the public, the court shall order  
13 the officer or other person charged with withholding the records to disclose those  
14 records or show cause why that person should not do so." Gov. Code § 7923.100.

15          46.    "If the court finds that the public official's decision to refuse disclosure is  
16 not justified" "the court shall order the public official to make the record public." Gov.  
17 Code § 7923.110(a).

18          47.    Exemption "disclosure of records of complaints to, or investigations  
19 conducted by, or records of intelligence information or security procedures of, the office  
20 of the Attorney General and the Department of Justice, the Office of Emergency  
21 Services and any state or local police agency, or any investigatory or security files  
22 compiled by any other state or local police agency, or any investigatory or security files

1 compiled by any other state or local agency for correctional, law enforcement, or  
2 licensing purposes.” Gov Code § 7923.600(a). \*note: repealed and replaced § 6254(f).

3 48. *American Civil Liberties Union Foundation v. Deukmejian* (1982), 186 Cal.  
4 Rptr. 235, 32 Cal. 3d 440 held that widely applying narrow “intelligence information”  
5 exemption law to exclude all police investigation records “would effectively exclude the  
6 law enforcement function of the state and local governments from any public scrutiny  
7 under the California (Public Records) Act, a result inconsistent with its fundamental  
8 purpose.” *Deukmejian*, § 2a. Furthermore, the court concluded that broadly applying this  
9 exemption to deny access to public records was unlawful because “the scope of the  
10 intelligence information exemption alone thus is insufficient to justify the defendants’  
11 blanket refusal of disclosure.” *Deukmejian*, § 2b.

12 49. *Haynie v. Superior Ct.* (2001), 26 Cal.4th 1061, 1069 (*Haynie*), held that  
13 investigatory exemptions could apply to some specific records, but acknowledged the  
14 legislature which allows those exemptions did “not mean to shield everything law  
15 enforcement officers do from disclosure.”

16 50. In *Castañares v. Superior Court* (Dec. 2023), 98 Cal.App.5th 295, 316,  
17 (*Castañares*) the Court held that police drone footage is not automatically exempt from  
18 disclosure pursuant to § 7923.600 as investigatory records under the CPRA.

19 51. “Notwithstanding subdivision (a), Section 7923.600 of the Government  
20 Code, or any other law, the following peace officer or custodial officer personnel records  
21 and records maintained by a state or local agency shall not be confidential and shall be

1 made available for public inspection pursuant to the California Public Records Act.”

2 California Penal Code § 832.7(b)(1).

3 52. “Records that shall be released pursuant to this subdivision include all  
4 investigative reports; photographic, audio, and video evidence;” California Penal Code  
5 § 832.7 (3).

6 53. In *Pacific Merchant Shipping Assn. v Board of Pilot Commissioners etc.*  
7 (2015), 242 Cal. App. 4<sup>th</sup> 1043, 1059 (*Pacific*) the Court held that “good faith arguments  
8 in opposition to CPRA coverage are hardly comparable” to “good faith efforts to fully  
9 and timely respond to a records request.”

10 54. *Becerra v. Superior Court (2020)*, 44 Cal. App. 5<sup>th</sup> 897, 914 (*Becerra*) has  
11 already successfully challenged the prior common unlawful practice by California police  
12 agencies to consider all BWC video categorically exempted from the CPRA’s general  
13 requirement of public disclosure.

#### 14 **Argument**

15 55. The CPRA provides members of the public with two basic rights when  
16 seeking records from public agencies: (1) to inspect public records, and (2) to receive  
17 copies of available public records. Gov. Code § 7922.525. Respondents denied  
18 Petitioner those rights by their wrongful rejection of his CPRA request. Moreover,  
19 Respondents’ unlawful blanket refusal to release any BWC video to the public has a  
20 corrosive effect on that basket of rights granted to Petitioner and all members of the  
21 public.

1           56.     Under the CPRA, any person can file a Petition for Writ of Mandate to  
2     enforce their right to access public records. Gov. Code § 7923.000.

3           57.     BWC video created within the scope of a police officer's duties, as  
4     occurred during Petitioner's traffic detainment, are public records, because they  
5     constitute a "writing", to wit, a "means of recording" which includes "words, pictures,  
6     sounds \*\*\* or combinations thereof." Gov. Code § 7920.545.

7           58.     Petitioner is a member of the public and has a legitimate interest in the  
8     BWC video at issue, and all other records of his 7/7/2025 traffic stop. Therefore, the  
9     requested BWC video and any other records related to that stop are self-evidently of  
10    public interest. And, just as clearly, they are public records subject to release when  
11    sought by means of a CPRA request, such as filed by Petitioner.

12          59.     SVPD "Members shall have no expectation of privacy" "in the content of  
13    BWC recordings made while acting in an official capacity for this department." SVPD  
14    Policy Manual § 348.4(e). "The use of the BWC is intended to enhance the  
15    effectiveness of investigations and increase departmental transparency by accurately  
16    capturing contacts between members of the Department and the public." SVPD Policy  
17    Manual § 348.2. The Manual further states that public "requests for BWC shall be  
18    accepted, processed and released in accordance with" the law and that "Any other  
19    release of BWC digital media shall be at the sole direction of the Chief of Police or  
20    designee and in the public interest." SVPD Policy Manual § 348.8. See SVPD Policy  
21    Manual (version 7/15/2025) pp. 274,275, 277, and 279:  
22    <https://www.simivalley.org/home/showpublisheddocument/28431/638931150018370000>

1 Respondents' denial of Petitioner's CPRA request for BWC video and blanket practice  
2 to deny release of any BWC video to the public are in direct contradiction of all these  
3 policies.

4 60. Respondents are mistaken in their representations to Petitioner that all  
5 SVPD BWC video created during his detainment is exempt from public disclosure.  
6 Respondents' failed to adequately specify legal authority for their denial of Petitioner's  
7 CPRA request. Instead, Respondents make the unreasonable assertion that the  
8 requested records are exempt under Gov Code § 7923.600(a), when none of the  
9 records requested by Petitioner are subject to any of the exemptions listed in that or any  
10 other section of the Code. Respondents' overly broad colorations are legally inadequate  
11 to support their denial of Respondent's CPRA request. "Pursuant to the California  
12 Constitution, the CPRA must be 'broadly construed' because its statutory scheme  
13 'furthers the people's right of access.'" *Becerra, supra*, p. 6, ln. 11.

14 61. The requested BWC video does not contain any records which would  
15 expose "security procedures", "records of intelligence", "security procedures", "security  
16 files", or any other records of which would compromise a legitimate security issue, nor  
17 does it contain any confidential "intelligence information." Gov Code § 7923.600(a).

18 62. Any investigation pertaining to Petitioner's traffic was concluded with his  
19 release at the end of that stop. Any BWC video generated during the now-closed  
20 investigation of Petitioner's traffic stop cannot, then, endanger the safety of any person  
21 involved with that investigation, nor can it endanger the successful completion of the  
22 investigation.

1           63.     Assembly Bill 748 (Chapter 690), filed September 30, 2018, and which  
2     became effective law July 1, 2019, was designed to prevent the overly broad use of the  
3     exemption pertaining to investigations in the manner of a blanket denial of CPRA  
4     requests for BWC in instances where use of force or critical incidents occurred. The Bill  
5     specified that police recording which depicted critical incidents or use of force resulting  
6     in serious bodily injury or death were not exempt under the rules governing  
7     investigations or confidential intelligence. The Bill was codified as § 7923.600, the first  
8     lines of the legislation read as follows:

9           “Peace officers: video and audio recordings: disclosure. Existing law, the  
10     California Public Records Act, requires that public records, as defined, be  
11     available to the public for inspection and made promptly available to any person.”  
12     Section 7923.600, therefore, both supplements and reinforces existing law requiring an  
13     agency’s prompt voluntary release of BWC video upon CPRA requests. Each and every  
14     exemption to the legislative mandate for release of public records must be narrowly  
15     defined, and cannot be applied broadly. Because the public records requested by  
16     Petitioner contain no confidential informants and did not contain other restricted  
17     “intelligence information”, Respondents’ denial of that request was unlawful.

18           64.     The *Deukmejian* court specified that the “intelligence information”  
19     exemption statutes was designed to protect the identity of confidential informants and  
20     other confidential information. *Deukmejian, supra*, 32 Cal.3d 440, 447.

21           65.     The California Supreme court has affirmed that even BWC video created  
22     during an investigation of “everyday” and “routine” detainments could be exempt from

1 disclosure. However, the Court ruled the purpose of the exemption must be justified by  
2 reasonable belief it could cause dissuade cooperation from complainants and other  
3 witnesses whose identities were disclosed, or could alert a suspect of an investigation  
4 to flee, or subject witnesses to threats, or cause evidence to be destroyed. *Haynie*,  
5 *supra*, 26 Cal.4th at pp. 1070–1071. Because none of those examples apply to the  
6 investigation during Petitioner’s detainment, it was unreasonable for Respondents,  
7 under color of an inapplicable application, to deny Petitioner’s lawful CPRA request for  
8 public records created by SVPD during that traffic stop.

9         66. If any section of the requested BWC video were subject to an exemption,  
10 Respondents would be required to redact the exempt material and release the  
11 remaining non-exempt material unredacted because “any reasonable segregable  
12 portion of a record shall be available for inspection by any person requesting the record  
13 after deletion of the portions that are exempted by law.” Gov. Code § 7922.525(b).

14         67. Respondents’ failed in their duty to assist Petitioner in any ways to  
15 “overcome any practical basis for denying access to the records sought,” Gov. Code §  
16 7922.600(a)(3). Respondents’ refusal to afford Petitioner any such mandated good-faith  
17 assistance in the matter at issue is contrary to law. *Pacific (2015)*, *supra*, 242 Cal.App.4th  
18 1043, 1053.

19         68. Had any issue related to statutory concerns regarding privacy or  
20 confidential information arisen during Petitioner’s detainment, it would have been  
21 recorded on the phone and dashcam video which Petitioner created during the entirety  
22 of the detainment from his position inside his vehicle. Despite being well-aware of

1 Petitioner's videos, Respondents have not made any assertion that said videos entail  
2 any privacy issues, nor have they alleged that these videos comprise a possible  
3 exposure of confidential information.

4 69. The BWC video withheld by Respondents comprises a unique record of  
5 SVPD officers' responses to the facts at issue. The public interest in the requested  
6 video is enhanced precisely because it would likely reveal words and actions of the  
7 officers in the course of their duties which were not observable to Petitioner from his  
8 detained position inside his vehicle. Revelation of candid responses of the officers to the  
9 circumstances of Petitioner's traffic detainment would likely provide useful and  
10 appropriate information relevant to Petitioner's ability to properly address the full scope  
11 of Respondents' refusal to comply with CPRA mandates.

12 70. Respondents' blanket policy of declaring all BWC video exempt from  
13 public release is violative of CPRA's "voluntary disclosure" requirement. Gov. Code §  
14 7921.500.

15 71. Respondents' policy of broadly denying all CPRA requests for video  
16 created by any SVPD officer in the course of their duties is a facial and blatant defiance  
17 of CPRA law, and is at odds with the legal principle consistently stated by California's  
18 reviewing courts that CPRA exemptions must be specific and considered on a case-by-  
19 case basis. The Supreme Court of California has held that broad or catchall exemptions  
20 which are invoked to deny CPRA requests trigger a legal analysis consisting of "a case-  
21 by-case balancing process, with the burden of proof on the proponent of nondisclosure



1 to demonstrate a clear overbalance on the side of confidentiality." *ACLU Foundation*,  
2 *supra*, 3 Cal. 5<sup>th</sup>, 1043.

3 72. It is true that a litigant in a civil or criminal matter may use the subpoena  
4 power to obtain relevant evidence, including BWC video. But the fact that certain  
5 evidence may be obtained by subpoena after a case has been set for trial or hearing  
6 does not eliminate the underlying fundamental rights to such evidence if it already  
7 qualifies as a public record under the CPRA.

8 73. A new investigation created by a member of the public, such as a civil  
9 action, a complaint, or this instant Petition, cannot be used as a basis to discriminate  
10 against access to the records sought through that procedure. The CPRA declares in  
11 clear language that it "does not allow limitations on access to a public record based  
12 upon the purpose for which the record is being requested." § 7921.300.

13 74. As asserted herein ¶¶ 23-33, no element of CPRA exemption law, other  
14 than § 7923.600 was cited or referenced by Respondents in justification for their timely  
15 denial of Petitioner access to the requested public records, therefore no other  
16 exemption to that request should be allowed for consideration.

17 75. The CPRA provides the right to relief for to members of the public when a  
18 local agency denies access or copies of public records or unreasonably delays access  
19 to public records. Gov. Code § 7923.000.

20 76. The agency opposing disclosure bears the burden of proving an  
21 exemption applies. §7923.100. See *Long Beach Police Officers Assn. v. City of Long*

1 *Beach (2014)*, 59 Cal.4th 59, 70; *County of Los Angeles v. Superior Court (2012)*, 211  
2 Cal.App.4th 57, 63.

3 77. Under the circumstances described herein, it is both proper and necessary  
4 for this honorable Court to exercise its authority to compel Respondents to act in  
5 compliance with the CPRA and supporting case law, and to release the requested  
6 public records to Petitioner. In the alternative, the Court should compel Respondents to  
7 show they were justified in withholding the requested records without citing any specific  
8 reason for doing so.

9 78. Petitioner has exhausted all available means at his disposal to facilitate  
10 Respondents' compliance with CPRA mandates, yet Respondents persist their refusal  
11 to perform their duty of providing Petitioner the public records to which he is entitled  
12 under the law. Respondents also persist in maintaining policies which, contrary to law,  
13 tend to abridge the public's right to access public records. Petitioner, therefore, now  
14 respectfully petitions this honorable Court to grant him extraordinary relief in the form of  
15 compelling Respondents to perform the duties assigned to them under the CPRA.

16 **Request for Relief**

17 WHEREFORE, the Petitioner, JOSHUA K. KATZ, requests that this Court:

18 1. Issue an Order granting the Petition for Writ of Mandate requiring the CITY OF  
19 SIMI VALLEY CLERKS OFFICE, the SIMI VALLEY CITY ATTORNEYS OFFICE, the  
20 SIMI VALLEY POLICE DEPARTMENT, and the CITY OF SIMI VALLEY POLICE  
21 DEPARTMENT RECORDS BUREAU to provide the Petitioner access to the public

1 records he requested in his original 7/8/2025 California Public Records Act request;

2 and,

3 2. Issue an Order requiring CITY OF SIMI VALLEY CLERKS OFFICE, the SIMI  
4 VALLEY CITY ATTORNEYS OFFICE, the SIMI VALLEY POLICE DEPARTMENT, and  
5 the CITY OF SIMI VALLEY POLICE DEPARTMENT RECORDS BUREAU henceforth to  
6 provide all members of the public access to BWC video upon proper CPRA requests;

7 and,

8 3. Award Petitioner costs of this action; and,

9 4. Award such further or other relief as this honorable Court may deem  
10 appropriate.

11

12 Dated: January 13, 2026  
13 Simi Valley, California  
14

15 Respectfully submitted,

16  
17 /s/ Joshua K. Katz  
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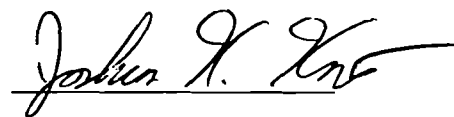
**Verification:**

I, Joshua Katz, declare:

I am the petitioner in this action and am authorized to make this verification. I have read the verified petition for writ of mandate. The facts stated in the Petition are either true and correct of my own personal knowledge, or I am informed and believe that such facts are true and correct, and on that basis, I allege them to be true and correct.

This verification was executed on 1/12/2026 in Simi Valley, California.

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

A handwritten signature in black ink, appearing to read "Joshua K. Katz", written over a horizontal line.

Joshua K. Katz

## PETITIONER'S APPENDIX

- i. Exhibit A - Clerk's Confirmation Receipt of Petitioner's CPRA Request (email), p. 1
- ii. Exhibit B - Letter Conclusion of Petitioner's Complaint Against SVPD, p.2
- iii. Exhibit C - Clerk's Initial Rejection of Petitioner's CPRA Request (email), p.3
- iv. Exhibit D - Clerk's Follow-up Rejection to Petitioner's Request to Appeal (email), p.4
- v. Exhibit E - Councilmember's Response to Petitioner's CPRA Rejection Concerns (email), pp.5,6



**Angelica Aguirre**

PETITIONER'S EXHIBIT A

To: me, Cc: Lucy, and 2 others Tue, Jul 8 at 3:37 PM ✓

Hello,

Thank you for contacting the Simi Valley City Clerk's Office. We are in receipt of your request for Public Records dated 7/8/2025 and have forwarded it to the appropriate department for identification of potentially responsive documents. You will receive a reply regarding the availability of responsive records and their cost (if any) as soon as possible. Should you have questions before that time, please contact the City Clerk's Office.

Respectfully,

Angelica Aguirre  
Deputy City Clerk  
City of Simi Valley  
2929 Tapo Canyon Road  
Simi Valley, CA 93063  
Ph. (805)583-6850

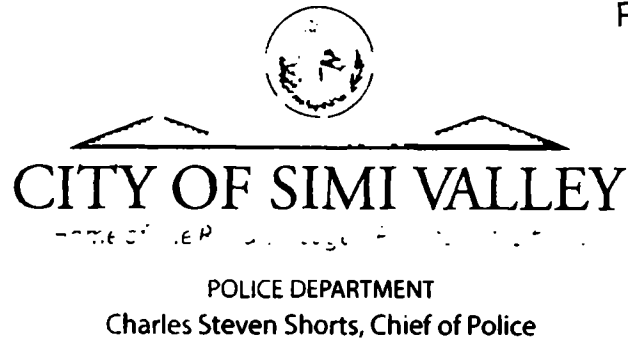


1 attachment

Download 



Public Records Request -...  
PDF · 71.4 KB



July 31, 2025

Joshua Keller Katz  
3345 Manorgate Place  
Simi Valley CA 93065

Dear Mr. Katz:

I am in possession of the personnel complaint you filed with the Simi Valley Police Department that was received on July 30, 2025, alleging wrongdoing by Officer Royce, Officer Yi, Officer Watson, and Sergeant Brennan.

As is standard practice in such matters, the Department initiated an investigation into the allegations to determine whether any of the officers' conduct was illegal or outside of Department policy.

This letter is to notify you that we have completed the investigation into this matter, and we appreciate your willingness to come forward with your concerns. The review of this case concluded that Officer Royce, Officer Yi, Officer Watson, and Sergeant Brennan did not act outside of policy or the law.

The Simi Valley Police Department prides itself on the professionalism of all its members and the high level of service we continually strive to deliver. Thank you for taking the time to share your concerns with us.

Sincerely,

A handwritten signature in black ink, appearing to read "Lincoln Purcell", written over a large, stylized circular mark.

Lincoln Purcell  
Assistant Chief of Police  
Operations Division



**Angelica Aguirre**

PETITIONER'S EXHIBIT C

To: City Clerk, and 2 others Thu, Jun 17 at 8:13 AM ✓

Hello ,

The City of Simi Valley City Clerk's Office is in receipt of your California Public Records Act (CPRA) request dated 7/8/2025 seeking Police Records . Please be advised, per Gov Code 7923.600 the items requested for release are exempt from disclosure.

The City Clerk's Office will consider your Public Records Act request closed at this time. Should you have any questions, please feel free to contact the City Clerk's Office at (805) 583-6748.

Respectfully,

Angelica Aguirre  
Deputy City Clerk  
City of Simi Valley  
2929 Tapo Canyon Road  
Simi Valley, CA 93063  
Ph. (805)583-6850



1 attachment

Download

Public Records ...  
PDF · 71.4 KB



## Public Records Request - Joshua Katz - 4171977

Your public records request No. 4171977 to the City of Simi Valley is exempt from disclosure under Gov Code SS7923.600 due to two subsequent emails requesting the same information.

Reply

Created by Yahoo Mail ⓘ

Was this message summary helpful?



Angelica Aguirre

To: me, Cor Lucy and 2 others Mon, Jul 28 at 2:21 PM ✓

Hello Joshua,

Regarding your request for public records No. 4171977, the City of Simi Valley is in receipt of two follow-up emails dated July 18, 2025, and July 28, 2025. Per our City Attorney's Office, the items requested for release are exempt from disclosure per Gov Code §7923.600. Also, the City of Simi Valley does not have a process for appealing this decision.

Thank you,

Angelica Aguirre

Deputy City Clerk

City of Simi Valley

2929 Tapo Canyon Road

Simi Valley, CA 93063

Ph. (805)583-6850

PETITIONER'S EXHIBIT E

Re: Concerns of Unlawful Practice(s) By Simi Valley Employees

From: Council Member Rhodes (rrhodes@simivalley.org)

To: joskelkatz@yahoo.com

Date: Monday, July 28, 2025 at 04:37 PM PDT

Joshua:

Thank you for the request. I will follow up with our city attorney on what practices and protocols are for sensitive records like body cam footage. I don't know your particular situation but I can understand privacy concerns in general with this type of record.

I am currently traveling out of the country for work but will continue to follow up. I apologize in advance if there are gaps in response due to a 14 hour time zone difference.

Sincerely,

Rocky Rhodes

Sent from my Phone

On Jul 29, 2025, at 3:49 AM, Joshua Katz <joskelkatz@yahoo.com> wrote:

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ATTENTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you suspect a phishing attempt please report it as phishing. Learn how.

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To Whom It May Concern,

I am trying to find a solution to a concern I have, without resorting to **official legal remedy, and welcome your guidance in completing that goal.**

For context, on 7-7-2024 I was the subject of a traffic stop. I disagree with how the police handled that encounter and I am seeking remedy directly with the Police Department. However, my reason for contacting you has to do with my attempts to gain access to the public records from that detainment, specifically Police bodycam footage.

My concern is with the City's Records Department adaption of a practice to always deny California Public Records Act requests for police bodycam footage, unless forced to surrender those public records by a court order. This blanket refusal of CPRA requests is, on its face, contrary to the CPRA rule of law. Furthermore, while it is also law to provide a specific reason for CPRA denials, the Clerk only cited a government code for exemptions. None of that code includes language that covers exemptions that could be related to the requested public material and no specific reason was given to justify the exemption in my case.

My multiple attempts to contact the Clerk's Office have gone ignored. Today, I also attempted to contact a supervisor within the Records Department.

**I request an in-person public meeting and/or written correspondence** in the effort to work together for the best interests of both the City and its residents to **resolve this matter** through good-faith negotiation.

Sincerely,

**Joshua Katz**

Simi Valley Resident, District 4