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25 Beverly Hills, CA 90212

26 Attorneys for Plaintiffs

27 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**

28 **COUNTY OF LOS ANGELES**

29 JOHN DOE 1, an individual; JOHN DOE 2, an
30 individual; JOHN DOE 3, an individual; JOHN
31 DOE 4, an individual; JOHN DOE 5, an
32 individual; JOHN DOE 6, an individual; JOHN
33 DOE 7, an individual; JOHN DOE 8, an
34 individual; JOHN DOE 9, an individual; JOHN
35 DOE 10, an individual; JOHN DOE 11, an
36 individual; JOHN DOE 12, an individual; JOHN
37 DOE 13, an individual; JOHN DOE 15, an
38 individual; JOHN DOE 16, an individual; JOHN
39 DOE 17, an individual; JOHN DOE 18, an

CASE NO.:

COMPLAINT FOR DAMAGES

1. **INVASION OF PRIVACY**
2. **PUBLIC DISCLOSURE OF PRIVATE FACTS**
3. **NEGLIGENCE**

1 individual; JOHN DOE 19, an individual; JOHN
2 DOE 20, an individual; JOHN DOE 21, an
3 individual; JOHN DOE 22, an individual; JOHN
4 DOE 23, an individual; JOHN DOE 24, an
5 individual; JOHN DOE 25, an individual; JOHN
6 DOE 26, an individual; JOHN DOE 27, an
7 individual; JOHN DOE 28, an individual; JOHN
8 DOE 29, an individual; JOHN DOE 30, an
9 individual; JOHN DOE 31, an individual; JOHN
10 DOE 32, an individual; JOHN DOE 33, an
11 individual; JOHN DOE 34, an individual; JOHN
12 DOE 35, an individual; JOHN DOE 36, an
13 individual; JOHN DOE 37, an individual; JOHN
14 DOE 38, an individual; JOHN DOE 39, an
15 individual; JOHN DOE 40, an individual; JOHN
16 DOE 41, an individual; JOHN DOE 42, an
17 individual; JOHN DOE 43, an individual; JOHN
18 DOE 44, an individual; JOHN DOE 45, an
19 individual; JOHN DOE 46, an individual; JOHN
20 DOE 47, an individual; JOHN DOE 48, an
21 individual; JOHN DOE 49, an individual; JOHN
22 DOE 50, an individual; JOHN DOE 51, an
23 individual; JOHN DOE 52, an individual; JOHN
24 DOE 53, an individual; JOHN DOE 54, an
25 individual; JOHN DOE 55, an individual; JOHN
26 DOE 56, an individual; JOHN DOE 57, an
27 individual; JOHN DOE 58, an individual; JOHN
28 DOE 59, an individual; JOHN DOE 60, an
individual; JOHN DOE 61, an individual; JOHN
DOE 62, an individual; JOHN DOE 63, an
individual; JOHN DOE 64, an individual; JOHN
DOE 65, an individual; JOHN DOE 66, an
individual; JOHN DOE 67, an individual; JOHN
DOE 68, an individual; JOHN DOE 69, an
individual; JOHN DOE 70, an individual; JOHN
DOE 71, an individual; JOHN DOE 72, an
individual; JOHN DOE 73, an individual; JOHN
DOE 74, an individual; JOHN DOE 75, an
individual; JOHN DOE 76, an individual; JOHN
DOE 77, an individual; JOHN DOE 78, an
individual; JOHN DOE 79, an individual; JOHN
DOE 80, an individual; JOHN DOE 81, an
individual; JOHN DOE 82, an individual; JOHN
DOE 83, an individual; JOHN DOE 84, an
individual; JOHN DOE 85, an individual; JOHN
DOE 86, an individual; JOHN DOE 87, an
individual; JOHN DOE 88, an individual; JOHN
DOE 89, an individual; JOHN DOE 90, an
individual; JOHN DOE 91, an individual; JOHN
DOE 92, an individual; JOHN DOE 93, an

4. **NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS**
 5. **BREACH OF CONTRACT – THIRD
PARTY BENEFICIARY**
 6. **LEGAL MALPRACTICE**
- DEMAND FOR JURY TRIAL**

1 individual; JOHN DOE 94, an individual; JOHN
2 DOE 95, an individual; JOHN DOE 96, an
3 individual; JOHN DOE 97, an individual; JOHN
4 DOE 98, an individual; JOHN DOE 99, an
5 individual; JOHN DOE 100, an individual;
6 JOHN DOE 101, an individual; JOHN DOE 102,
7 an individual; JOHN DOE 103, an individual;
8 JOHN DOE 104, an individual; JOHN DOE 105,
9 an individual; JOHN DOE 106, an individual;
10 JOHN DOE 107, an individual; JOHN DOE 108,
11 an individual; JOHN DOE 109, an individual;
12 JOHN DOE 110, an individual; JOHN DOE 111,
13 an individual; JOHN DOE 112, an individual;
14 JOHN DOE 113, an individual; JOHN DOE 114,
15 an individual; JOHN DOE 115, an individual;
16 JOHN DOE 116, an individual; JOHN DOE 117,
17 an individual; JOHN DOE 118, an individual;
18 JOHN DOE 119, an individual; JOHN DOE 120,
19 an individual; JOHN DOE 121, an individual;
20 JOHN DOE 122, an individual; JOHN DOE 123,
21 an individual; JOHN DOE 124, an individual;
22 JOHN DOE 125, an individual; JOHN DOE 126,
23 an individual; JOHN DOE 127, an individual;
24 JOHN DOE 128, an individual; JOHN DOE 129,
25 an individual; JOHN DOE 130, an individual;
26 JOHN DOE 131, an individual; JOHN DOE 132,
27 an individual; JOHN DOE 133, an individual;
28 JOHN DOE 134, an individual; JOHN DOE 135,
an individual; JOHN DOE 136, an individual;
JOHN DOE 137, an individual; JOHN DOE 138,
an individual; JOHN DOE 139, an individual;
JOHN DOE 140, an individual; JOHN DOE 141,
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JOHN DOE 143, an individual; JOHN DOE 144,
an individual; JOHN DOE 145, an individual;
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an individual; JOHN DOE 151, an individual;
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an individual; JOHN DOE 157, an individual;
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13 an individual; JOHN DOE 187, an individual;
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15 an individual; JOHN DOE 190, an individual;
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JOHN DOE 471, an individual; JOHN DOE 472,

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2 JOHN DOE 474, an individual; JOHN DOE 475,
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1 an individual; JOHN DOE 550, an individual;
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3 an individual; JOHN DOE 553, an individual;
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13 an individual; JOHN DOE 568, an individual;
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19 an individual; JOHN DOE 577, an individual;
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21 an individual; JOHN DOE 580, an individual;
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JOHN DOE 620, an individual; JOHN DOE 621,
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JOHN DOE 623, an individual; JOHN DOE 624,

1 an individual; JOHN DOE 625, an individual;
2 JOHN DOE 626, an individual; JOHN DOE 627,
3 an individual; JOHN DOE 628, an individual;
4 JOHN DOE 629, an individual; JOHN DOE 630,
5 an individual; JOHN DOE 631, an individual;
6 JOHN DOE 632, an individual; JOHN DOE 633,
7 an individual; JOHN DOE 634, an individual;
8 JOHN DOE 635, an individual; JOHN DOE 636,
9 an individual; JOHN DOE 637, an individual;
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11 an individual; JOHN DOE 640, an individual;
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13 an individual; JOHN DOE 643, an individual;
14 JOHN DOE 644, an individual; JOHN DOE 645,
15 an individual; JOHN DOE 646, an individual;
16 JOHN DOE 647, an individual; JOHN DOE 648,
17 an individual; JOHN DOE 649, an individual;
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19 an individual; JOHN DOE 652, an individual;
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23 an individual; JOHN DOE 658, an individual;
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JOHN DOE 689, an individual; JOHN DOE 690,
an individual; JOHN DOE 691, an individual;
JOHN DOE 692, an individual; JOHN DOE 693,
an individual; JOHN DOE 694, an individual;
JOHN DOE 695, an individual; JOHN DOE 696,
an individual; JOHN DOE 697, an individual;
JOHN DOE 698, an individual; JOHN DOE 699,

1 an individual; JOHN DOE 700 an individual,
2 JOHN DOE 701, an individual; JOHN DOE 703,
3 an individual

4 Plaintiffs,

5 vs.

6 LOS ANGELES POLICE DEPARTMENT, a
7 government entity; CITY OF LOS ANGELES, a
8 government entity; LIZABETH RHODES, an
9 individual; BRIAN TAFT, an individual; CHIEF
10 MICHEL MOORE, an individual; LOS
11 ANGELES CITY ATTORNEY MIKE FEUER,
12 an individual; HASMIK BADALIAN
13 COLLINS, an individual; and ROES 1 through
14 100, inclusive,

15 Defendants.

16 COME NOW Plaintiffs JOHN DOE 1, an individual; JOHN DOE 2, an individual; JOHN
17 DOE 3, an individual; JOHN DOE 4, an individual; JOHN DOE 5, an individual; JOHN DOE 6,
18 an individual; JOHN DOE 7, an individual; JOHN DOE 8, an individual; JOHN DOE 9, an
19 individual; JOHN DOE 10, an individual; JOHN DOE 11, an individual; JOHN DOE 12, an
20 individual; JOHN DOE 13, an individual; JOHN DOE 15, an individual; JOHN DOE 16, an
21 individual; JOHN DOE 17, an individual; JOHN DOE 18, an individual; JOHN DOE 19, an
22 individual; JOHN DOE 20, an individual; JOHN DOE 21, an individual; JOHN DOE 22, an
23 individual; JOHN DOE 23, an individual; JOHN DOE 24, an individual; JOHN DOE 25, an
24 individual; JOHN DOE 26, an individual; JOHN DOE 27, an individual; JOHN DOE 28, an
25 individual; JOHN DOE 29, an individual; JOHN DOE 30, an individual; JOHN DOE 31, an
26 individual; JOHN DOE 32, an individual; JOHN DOE 33, an individual; JOHN DOE 34, an
27 individual; JOHN DOE 35, an individual; JOHN DOE 36, an individual; JOHN DOE 37, an
28 individual; JOHN DOE 38, an individual; JOHN DOE 39, an individual; JOHN DOE 40, an
individual; JOHN DOE 41, an individual; JOHN DOE 42, an individual; JOHN DOE 43, an
individual; JOHN DOE 44, an individual; JOHN DOE 45, an individual; JOHN DOE 46, an
individual; JOHN DOE 47, an individual; JOHN DOE 48, an individual; JOHN DOE 49, an
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3 individual; JOHN DOE 59, an individual; JOHN DOE 60, an individual; JOHN DOE 61, an
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18 individual; JOHN DOE 698, an individual; JOHN DOE 699, an individual; JOHN DOE 700, an
19 individual; JOHN DOE 701, an individual; JOHN DOE 703, an individual complain and allege
20 against LOS ANGELES POLICE DEPARTMENT; a Government entity; CITY OF LOS
21 ANGELES, a Government Entity; LIZABETH RHODES, an individual; BRIAN TAFT, an
22 individual; CHIEF MICHEL MOORE, an individual; LOS ANGELES CITY ATTORNEY MIKE
23 FEUER, an individual; HASMIK BADALIAN COLLINS, an individual; and ROES 1 through
24 100, inclusive, as follows:

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INTRODUCTION

1
2 1. The City of Los Angeles (“the City”) perpetrated one of the worst security breaches
3 in recent memory, releasing service photographs of undercover officers pursuant to a California
4 Public Records Act (“CPRA”) request; all without notifying any of the affected officers or even
5 informing their union, the Los Angeles Police Protective League (“LAPPL”), of the pending
6 request.

7 2. The release of these service photographs of undercover officers has caused
8 significant and direct harm to those officers, placing their lives in immediate danger and disrupting
9 their safety, privacy, and general wellbeing.

10 3. The City owed a duty to its undercover officers to protect their lives and safety by
11 not releasing pictures of them to the public. With the advances in facial recognition, the damages
12 and harms caused by the breach of this duty could be catastrophic and irreversible, both for the
13 City and for the individual officers whose lives have now been placed in continuous jeopardy.

14 4. Indeed, the City itself has admitted in a sworn declaration the harm its invasion of
15 Plaintiffs’ privacy and release of the photograph caused. In a sworn declaration submitted by the
16 City in its lawsuit against the recipients of the negligently released photographs, Captain Jonathan
17 L. Tippet stated:

18 I... firmly believe that disclosure of these photographs will jeopardize the
19 investigation of significant criminal cases—and permanently endanger the
20 lives of the officers assigned to those cases as well as the lives of their families.
21 In short, the production and dissemination of the photos will forever cripple
our ability to protect and serve—the core mission of LAPD—and protect our
own officers, their spouses and partners, and their children.

22 No other proof is needed here. The City has admitted that the release of these photographs have
23 placed the lives of these officers in danger. The release invaded their privacy and was a breach of
24 the duty the City owed to these officers to keep them safe while they undertook dangerous and
25 sensitive operations on behalf of the City and its citizens. The City must therefore compensate
26 these officers for harm caused by the City’s intentional and/or negligent acts.

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THE PARTIES

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2 5. At all times relevant hereto, Plaintiffs were employed by the Los Angeles Police
3 Department (“LAPD” or “Department”) of the City. All Plaintiffs are and/or were undercover
4 police officers with the LAPD at the time of the leak of information. Because Plaintiffs’ lives are in
5 jeopardy and in danger, Plaintiffs are entitled to protect their identities and full name in this public
6 court filing by identifying themselves as real parties in interest proceeding under a pseudonym.
7 (See *Doe v. Lincoln Un. Sch. Dist.* (2010) 188 Cal.App.4th 758.)

8 6. The City at all times mentioned herein was a municipal corporation operating under
9 the laws of the State of California and a “public agency” within the meaning of Government Code
10 section 7920.525, and a “local agency” within the meaning of Government Code section 7920.510
11 of the CPRA.

12 7. Defendants ROES 1 through 100, inclusive, and each of them, are sued herein under
13 fictitious names. Plaintiffs are unaware of the true names and capacities of each Defendant sued
14 herein as ROES 1 through 100, inclusive, and for that reason sue said Defendants by such fictitious
15 names at this time. Each of the Defendants designated herein as a ROE is negligently,
16 intentionally, or otherwise legally responsible in some manner for the events and happenings herein
17 referred to, and caused injuries and damages proximately thereby to Plaintiffs, as alleged herein.

18 8. When the true names, identities, or capacities of such fictitiously designated
19 Defendants are ascertained, Plaintiffs will seek leave of Court to amend the Complaint to assert the
20 true names, identities, and capacities, together with the proper charging allegations.

21 9. At all times relevant herein, Defendants were the agents, servants, employees, and
22 joint venturers of each other and of their co-defendants and were acting within the course and
23 scope of their employment, agency, or joint venture with the full knowledge, consent, authority,
24 ratification, and/or permission of each of the remaining defendants.

25 10. Unless otherwise specified, reference to a Defendant shall mean all Defendants, and
26 each of them, including all fictitious ROE Defendants.

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1 **VENUE AND JURISDICTION**

2 11. At all relevant times hereto, the Defendants, and each of them, were residing in the
3 County of Los Angeles, State of California.

4 12. The wrongful conduct alleged against the Defendants, and each of them, occurred in
5 the County of Los Angeles, State of California. At all relevant times hereto, the conduct at issue
6 was part of a continuous and ongoing pattern of behavior.

7 13. This Court is the proper court because the wrongful acts that are the subject of this
8 action occurred here, at least one Defendant now resides in its jurisdictional area, and injury to
9 person or damage to personal property occurred in its jurisdictional area.

10 **COMPLIANCE WITH THE GOVERNMENT TORT CLAIMS ACT**

11 14. Plaintiffs, and each of them, have filed government tort claims for damages to the
12 City of Los Angeles on the following dates: April, 4, 2023; April 7, 2023; April 14, 2023; April 21,
13 2023; April 28, 2023; May 5, 2023; June 9, 2023; June 16, 2023; June 29, 2023; July 12, 2023;
14 July 20, 2023; August 4, 2023, August 17, 2023, August 29, 2023 and September 8, 2023.

15 **FACTS COMMON TO ALL CAUSES OF ACTION**

16 15. The names used by Plaintiff(s) JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN
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20 JOHN DOE 652, JOHN DOE 653, JOHN DOE 654, JOHN DOE 655, JOHN DOE 656, JOHN
21 DOE 657, JOHN DOE 658, JOHN DOE 659, JOHN DOE 660, JOHN DOE 661, JOHN DOE 662,
22 JOHN DOE 663, JOHN DOE 664, JOHN DOE 665, JOHN DOE 666, JOHN DOE 667, JOHN
23 DOE 668, JOHN DOE 669, JOHN DOE 670, JOHN DOE 671, JOHN DOE 672, JOHN DOE 673,
24 JOHN DOE 674, JOHN DOE 675, JOHN DOE 676, JOHN DOE 677, JOHN DOE 678, JOHN
25 DOE 679, JOHN DOE 680, JOHN DOE 681, JOHN DOE 682, JOHN DOE 683, JOHN DOE 684,
26 JOHN DOE 685, JOHN DOE 686, JOHN DOE 687, JOHN DOE 688, JOHN DOE 689, JOHN
27 DOE 690, JOHN DOE 691, JOHN DOE 692, JOHN DOE 693, JOHN DOE 694, JOHN DOE 695,
28 JOHN DOE 696, JOHN DOE 697, JOHN DOE 698, JOHN DOE 699, JOHN DOE 700, JOHN

1 DOE 701, and JOHN DOE 703 in this Complaint are not the true name of Plaintiffs but are
2 fictitious names utilized to protect the identity and privacy of Plaintiffs.

3 16. The names of all DOES have been identified as “JOHN” and is gender neutral to
4 protect the identity and privacy of Plaintiffs.

5 17. The true names and identities of the Plaintiffs have been provided to the City
6 Attorney prior the filing of this Complaint.

7 18. On or about October 21, 2021, an individual named Ben Camacho filed a CPRA
8 request with LAPD seeking production of a roster of all LAPD sworn officers together with
9 Department headshots of those officers.

10 19. On or about January 25, 2022, the LAPD notified Camacho in writing that the
11 LAPD was providing Camacho the requested roster for the sworn personnel but was denying his
12 request for the Department headshot photographs of such personnel based, *inter alia*, upon
13 Government Code section 6255 which exempts the disclosure of records where the public interest
14 by not disclosing the record clearly outweighs the public interest served by disclosure.

15 20. On May 27, 2022, Camacho filed a Petition for Writ of Mandate and Complaint for
16 Injunctive and Declaratory Relief against the City for declining to produce the Department
17 headshot photographs, *Ben Camacho v. City of Los Angeles*, Case No. 22 STCP0209 (“Camacho
18 Lawsuit”).

19 21. From the inception of the litigation, the matter was assigned to Hasmik Badalian
20 Collins, Deputy City Attorney, and Police Administrator III Lizabeth Rhodes, Director of the
21 Office of Constitutional Policing and Policy and an employee of the Department. Ms. Rhodes
22 neglected her duty to make the appropriate notifications to senior members of the Department,
23 including Chief Michel Moore, despite knowing of such a significant request and the critical
24 impacts it would have.

25 22. Nevertheless, the City and the Department attempted to undertake the duty of
26 excluding from any production the pictures of officers in undercover or sensitive positions. On
27 August 29, 2022, Ms. Collins emailed Shakeer Rahman and Colleen Flynn an update on the
28 production. She stated: “I asked about the scope of disclosure. The only officers they are excluding

1 from disclosure are undercover officers, which is expected.”

2 23. Camacho and the City reached an agreement on the production in response to the
3 CPRA request. As set forth above, the production pursuant to the settlement agreement would
4 exclude photographs of undercover officers.

5 24. On or about September 16, 2022, the Deputy City Attorney Ms. Collins offered to
6 settle the Camacho lawsuit by providing Camacho with: (1) a full and current roster of all active-
7 duty LAPD officers as of July 3, 2022; and (2) photographs of all active duty sworn police officers,
8 *except for the **undercover** active duty sworn police officers*. A true and correct copy of the City
9 Attorney’s Office’s September 16, 2022 letter is attached hereto as **Exhibit 1** and is incorporated
10 herein as though fully set forth.

11 25. On or about September 21, 2022, the Los Angeles City Attorney’s Office produced
12 to Camacho’s attorneys a flash drive containing headshots of all police officers, in the LAPD’s
13 possession, as of July 3, 2022, including all undercover active duty sworn police officers and any
14 police officers with prior undercover assignments with the exception of those police officers coded
15 “650”, a designation given to a small fraction of undercover police officers. Significantly, the
16 accompanying letter from Ms. Collins noted: “As discussed and agreed upon by all counsel, images
17 of officers working in an undercover capacity as of the time the pictures were downloaded (end of
18 July 2022) are not included.” (Emphasis added.)

19 26. On or about November 10, 2022, Camacho and the City of Los Angeles entered into
20 a settlement agreement regarding the attorneys’ fees to be paid to Camacho and his counsel. The
21 settlement noted that the City, “has acted in good faith and with reasonable diligence to produce
22 available, responsive, non-exempt records to Petitioner.”

23 27. On December 15, 2022, Stop LAPD Spying Coalition sent a public records request
24 to the Department requesting “a current roster of all LAPD officers reflecting the following
25 information for of each officer: name, serial number, ethnicity, gender, area, rank, year of hire,
26 weight, and height.” The request did not exclude undercover active duty sworn police officers. On
27 December 27, 2022, the Department responded through Analyst Farah N5890 and requested a 14-
28 day extension to respond to the public record request.

1 28. On January 10, 2023, the City responded to Stop LAPD Spying Coalition’s request
2 by providing a full current roster of Department sworn police officers. The Department further
3 responded by providing Stop LAPD Spying Coalition with the name, serial number, ethnicity,
4 gender, area, rank, year of hire, of all active duty sworn police officers, ***again including***
5 ***undercover active duty sworn police officers and any officers with prior undercover assignments.***
6 The Department did not produce the height and weight of active duty sworn police officers and
7 cited California Government Code sections 7927.700 and 7922.000 when arguing such information
8 would constitute “unwarranted invasion of personal privacy and/or would not serve the public
9 interest.”

10 29. On March 16, 2023, the LAPPL first discovered from a Los Angeles Times reporter
11 that all LAPD officers’ photographs, names and serial numbers had been publicly released by the
12 LAPD in response to a CPRA request and that all such information was to be posted on a publicly
13 accessible website the next morning. Thereafter, LAPPL discovered that photographs of its
14 represented employees, including peace officers working in undercover or sensitive law
15 enforcement assignments (“undercover officers”), had been produced by the City Attorney’s Office
16 in response to Camacho’s CPRA request.

17 30. On March 17, 2023, the Stop LAPD Spying Coalition (represented by one of the
18 attorneys representing Camacho in the Camacho Lawsuit) launched a website entitled, “Watch the
19 Watchers.” That website contains a database that permits an individual to search for any LAPD
20 officer, including all undercover LAPD officers, by either the officer’s name or serial number. The
21 website then produces a picture of the officer in question, including email, ethnicity, gender,
22 division, rank, year of hire, and salary information of all active duty sworn police officers,
23 ***including those officers working in, or who had worked in an undercover assignment or***
24 ***capacity.*** Plaintiffs are informed and believe that the database used in the “Watch the Watchers”
25 website was created using the information and photographs received in response to Camacho’s and
26 Stop LAPD Spying Coalition’s CPRA requests and lawsuits.

27 31. On March 18, 2023, Defendant Chief Moore, in an email to all LAPD personnel,
28 apologized to members of the LAPD impacted by the release of officers’ photographs, stating

1 “once the decision was made to release the information ... appropriate safeguards were not put in
2 place to ensure those assigned to sensitive investigations were not included,” nor were “steps []
3 taken to alert our membership of the required release.” Chief Moore also advised LAPD personnel
4 in that communication of his directive for an immediate investigation into the circumstances of the
5 release of the information. A true and correct copy of Chief Moore’s March 18, 2023 email is
6 attached hereto as **Exhibit 2** and incorporated herein as though fully set forth.

7 32. On March 21, 2023, during a regular meeting of the Los Angeles Police
8 Commission, Chief Moore again apologized for the disclosure of the officers’ photographs and
9 expressed his concern for the safety of the undercover officers’ whose photos had been released.

10 33. On March 20, 2023, Steven William Sutcliffe, using the Twitter username
11 killercop1984, posted on Twitter and linked to a database created by Stop LAPD Spying Coalition,
12 and wrote: “Clean head-shots on these #LAPD officers. A to Z.”

13 34. Previously, Sutcliffe posted the following: “Remember, #Rewards are double all
14 year for #detectives and #female cops.” The post itself included a picture that included an offer of
15 rewards for the killing of LAPD officers, stating: “and \$2,000.10 if he’s an LAPD cop.”

16 35. On March 21, 2023, Sutcliffe posted the following:

17 We have now #published over 9000 names and head-shots of numerous
18 regular and #undercover #LAPD officers on x|i||ə|ɹ|ɔ|ɔ|q.ɔ|ɔ|m online. A to Z. Let
19 the games begin!! Remember, nobody pays more for LAPD head-shots then
x|i||ə|ɹ|ɔ|ɔ|q.ɔ|ɔ|m

20 Payback time!

21 36. These **threats** have been repeatedly reiterated by Sutcliffe. On March 10, 2023, he
22 wrote: “LAPD’s finest, protecting and serving....” He again included a picture of his offer of
23 reward money for the **murder** of LAPD officers.

24 37. On March 10, 2023, Sutcliffe linked to a discussion on the website reddit.com about
25 the indictment of 11 police officers in Ohio, writing: “LEGALLY KILL THEM ALL.”

26 38. On March 15, 2023, Sutcliffe posted the following, again referring to his “rewards”:
27 “Here are my reward prices from such attacks... from 1998. I see nothing has changed with cops.
28 Should I increase the prices?”

1 39. On March 18, 2023, Sutcliffe posted a picture of an alleged billboard including his
2 offer, writing:

3 Keep an eye out for our new billboards appearing all across America!
4 Remember, only you can prevent illegal arrests, and collect a large cash
5 #Reward when you do!

6 #America #Lapd #police #cops #illegal #Arrest #Selectiveoutrage

7 40. On March 18, 2023, Sutcliffe posted a second picture of an alleged billboard
8 repeating his offer, writing: “From Los Angeles to Houston 🤖, we got you covered, America! [¶]
9 #anycop #largecashrewards”

10 41. On March 18, 2023, Sutcliffe wrote as follows, while linking to a video about a
11 drone delivery service: “We’ve partnered with Zipline to bring you faster, large cash rewards all
12 across America. Earned a reward and need it fast, with no questions asked? Contact Killercop and
13 we can Zipline it to you within 30 min or less!”

14 42. These posts represent a clear and direct **threat** to all officers whose pictures were
15 placed on Sutcliffe’s website as a direct result of the release of pictures of undercover officers by
16 Defendants.

17 43. On April 6, 2023, the City filed a lawsuit against Camacho and Stop LAPD Spying
18 Coalition, alleging causes of action for: (1) Possession of Personal Property by Claim and Delivery
19 (Civ. Code § 3379 et seq.); (2) Declaratory Relief; and (3) Petition for Return of Government
20 Records (Gov. Code § 6204 et seq.) In Paragraph 17 of the Complaint, the City alleges that:

21 Photographs and images of officers working in undercover capacities are
22 exempt from disclosure under the CPRA and California law, including
23 Government Code Section 7922.000 (formerly Section 6255(a)), and
24 California case law. (*Commission on Peace Officer Standards & Training v.*
25 *Superior Court* (2007) 42 Cal.4th 278, 301.)

26 A true and correct copy of Complaint filed by the City against Camacho and Stop LAPD Spying
27 Coalition is attached hereto as **Exhibit 3** and incorporated herein as though fully set forth.

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1 44. In its complaint, the City also alleges that possession of the photographs harms
2 officers of the Department, including Plaintiffs:

3 Defendants' possession of undercover officers' identifying information and
4 photographs, including on Defendants' website Watch the Watchers, subjects
5 these officers and their families to potential **threats** and the possibility of
6 danger, and harms the efficacy of LAPD's undercover operations that require
7 anonymity.

8 (See Exh. C, ¶18.)

9 **PLAINTIFFS' ECONOMIC AND NON-ECONOMIC DAMAGES**

10 45. As a direct and proximate result of Defendants' acts, omissions, wrongful conduct,
11 and breaches of their respective duties, Plaintiffs have suffered, and continue to suffer, substantial
12 economic and non-economic damages, including but not limited to the following:

13 a. Emotional distress, including but not limited to anxiety; depression; low
14 self-esteem; difficulty in meaningfully interacting with others; trust issues; struggles with
15 interpersonal relationships; difficulty communication; difficulty/disruptive sleeping; headaches;
16 post-traumatic stress symptoms; stress; fear; nervousness; nausea; headaches; physical pain; grief;
17 embarrassment; humiliation; shame; and loss of enjoyment of life;

18 b. Loss of past and/or future earnings, in an amount to be proven at trial but no
19 less than the minimum jurisdictional amount of this court; and

20 c. Loss of future employment, and/or professional development opportunities,
21 in an amount to be proven at trial but no less than the minimum jurisdictional amount of this court;

22 **FIRST CAUSE OF ACTION**

23 **INVASION OF PRIVACY**

24 *(By Plaintiffs Against all Defendants)*

25 46. Plaintiffs reassert, re-allege, and incorporate by reference, as if fully stated herein,
26 each and every allegation contained above in this Complaint.

27 47. As officers ***who were working in, or who had worked in an undercover***
28 ***assignment or capacity*** for the Department, Plaintiffs had an expectation of privacy in their
photographs as set forth in the following provisions:

1 a. Penal Code section 832.7, subdivision (b)(6)(C): “To protect confidential
2 medical, financial, or other information of which disclosure is specifically prohibited by
3 federal law or would cause an unwarranted invasion of personal privacy that clearly
4 outweighs the strong public interest in records about possible misconduct and use of force
5 by peace officers and custodial officers.”

6 b. Penal Code section 832.7, subdivision (b)(6)(D): “Where there is a specific,
7 articulable, and particularized reason to believe that disclosure of the record would pose a
8 significant danger to the physical safety of the peace officer, custodial officer, or another
9 person.”

10 c. Penal Code section 832.7, subdivision (b)(7): “Notwithstanding paragraph
11 (6), an agency may redact a record disclosed pursuant to this section, including personal
12 identifying information, where, on the facts of the particular case, the public interest served
13 by not disclosing the information clearly outweighs the public interest served by disclosure
14 of the information.”

15 d. Government Code section 7922.000: “An agency shall justify withholding
16 any record by demonstrating that the record in question is exempt under express provisions
17 of this division, or that on the facts of the particular case the public interest served by not
18 disclosing the record clearly outweighs the public interest served by disclosure of the
19 record.”

20 e. Civil Code section 1798.140, subdivisions (b) and (o)(1): “biometric
21 information includes, but is not limited to ... imagery of the iris, retina, fingerprint, face,
22 hand ...”; “Personal information includes, but is not limited to ... (E) Biometric
23 information.”

24 48. The City, through Ms. Collins and Ms. Rhodes, invaded and violated the
25 expectation of privacy held by Plaintiffs by releasing their photographs in response to a CPRA
26 request.

27 49. The release of the photographs of Plaintiffs, *who were working in, or who had*
28 *worked in an undercover assignment or capacity* would be highly offensive to a reasonable

1 person, as it placed the lives of Plaintiffs and their families directly in jeopardy and danger. Given
2 existing threats, Defendants knew or should have known that severe emotional distress would
3 result from the publication and distribution of the photographs of Plaintiffs.

4 50. As a direct, legal, and proximate cause of the acts of Defendants, Plaintiffs sustained
5 serious and permanent injuries to their persons, in amounts to be proven at the time of trial, but
6 which exceed the minimum jurisdictional limits of this Court.

7 51. As a direct and proximate result of Defendants' conduct, individually, jointly,
8 and/or severally, Plaintiffs sustained severe emotional distress and physical pain, emotional
9 anguish, fear, anxiety, humiliation, embarrassment, and other physical and emotional damages
10 (both economic and non-economic) in the past, present, and future. The injuries suffered by
11 Plaintiffs are substantial, continuing, and permanent.

12 52. Plaintiffs are informed and believe, and based thereon allege, that the conduct of
13 Defendants was oppressive, malicious, and despicable in that it was intentional and done in
14 conscious disregard for the rights and safety of others, and were carried out with a conscious
15 disregard of Plaintiffs' right to be free from such tortious behavior, such as to constitute
16 oppression, fraud, or malice pursuant to California Civil Code Section 3294, thus entitling
17 Plaintiffs to punitive damages.

18 **SECOND CAUSE OF ACTION**

19 **PUBLIC DISCLOSURE OF PRIVATE FACTS**

20 *(By Plaintiffs Against all Defendants)*

21 53. Plaintiffs reassert, re-allege, and incorporate by reference, as if fully stated herein,
22 each and every allegation contained above in this Complaint.

23 54. As officers ***who were working in, or who had worked in an undercover***
24 ***assignment or capacity*** for the Department, Plaintiffs had an expectation of privacy in their
25 photographs as set forth in the following provisions:

- 26 a. Penal Code section 832.7, subdivision (b)(6)(C): "To protect confidential
27 medical, financial, or other information of which disclosure is specifically prohibited by
28 federal law or would cause an unwarranted invasion of personal privacy that clearly

1 outweighs the strong public interest in records about possible misconduct and use of force
2 by peace officers and custodial officers.”

3 b. Penal Code section 832.7, subdivision (b)(6)(D): “Where there is a specific,
4 articulable, and particularized reason to believe that disclosure of the record would pose a
5 significant danger to the physical safety of the peace officer, custodial officer, or another
6 person.”

7 c. Penal Code section 832.7, subdivision (b)(7): “Notwithstanding paragraph
8 (6), an agency may redact a record disclosed pursuant to this section, including personal
9 identifying information, where, on the facts of the particular case, the public interest served
10 by not disclosing the information clearly outweighs the public interest served by disclosure
11 of the information.”

12 d. Government Code section 7922.000: “An agency shall justify withholding
13 any record by demonstrating that the record in question is exempt under express provisions
14 of this division, or that on the facts of the particular case the public interest served by not
15 disclosing the record clearly outweighs the public interest served by disclosure of the
16 record.”

17 e. Civil Code section 1798.140, subdivisions (b) and (o)(1): “biometric
18 information includes, but is not limited to ... imagery of the iris, retina, fingerprint, face,
19 hand ...”; “Personal information includes, but is not limited to ... (E) Biometric
20 information.”

21 55. The City, through Ms. Collins and Ms. Rhodes, publicly disclosed the private
22 photographs of undercover officers through the City’s responses to the CPRA request filed by Mr.
23 Camacho.

24 56. The disclosure of the photographs of officers *who were working in, or who had*
25 *worked in an undercover assignment or capacity*, placed their lives in jeopardy and caused
26 substantial emotional distress to Plaintiffs, would be offensive and objectionable to a reasonable
27 person.

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1 unable to represent an officer's interests, it has disclosed that conflict to the individual officer and
2 has advised the officer of the need to retain independent counsel.

3 80. Because the City Attorney's Office represents individual officers under these
4 circumstances, and has held itself out as doing so continuously, and without exception for at least
5 the last 20-years, then it also represented Plaintiffs and other undercover officers when it
6 negotiated a settlement calling for the disclosure of their personnel information pursuant to the
7 CPRA requestes filed by Camacho and Stop LAPD Spying Coalition.

8 81. Defendants breached their legal duty of care owed to Plaintiffs by producing the
9 photographs of undercover officers, including Plaintiffs, to Camacho.

10 82. Defendants further breached their legal duty of care owed to Plaintiffs by not
11 specifying which undercover officers would be exempted from the production to Camacho.

12 83. Defendants further breached their legal duty of care owed to Plaintiffs by not
13 informing them of the pending CPRA request by Camacho.

14 84. As a direct, legal, and proximate result of the breach of the legal duty by
15 Defendants, Plaintiffs sustained serious and permanent injuries to their persons, in amounts to be
16 proven at the time of trial, but which exceed the minimum jurisdictional limits of this Court.

17 85. As a direct and proximate result of the breach of the legal duty by Defendants,
18 Plaintiffs sustained severe emotional distress and physical pain, emotional anguish, fear, anxiety,
19 humiliation, embarrassment, and other physical and emotional damages (both economic and non-
20 economic) in the past, present, and future. The injuries suffered by Plaintiffs are substantial,
21 continuing, and permanent.

22 86. The harm caused by the release and disclosure of the photographs of undercover
23 officers, including Plaintiffs, was directly and reasonably foreseeable by Defendants.

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PRAYER FOR RELIEF

WHEREFORE, Plaintiffs, and each of them, pray for a jury trial and for judgment against Defendants FOR ALL CAUSES OF ACTION as follows:

1. For past, present, and future non-economic damages in an amount to be determined at trial;
2. For past, present, and future special damages, including but not limited to past, present, and future lost earnings, economic damages and others, in an amount to be determined at trial;
3. Any appropriate statutory damages;
4. For costs of suit;
5. Punitive and treble damages, according to proof, though not as to the Negligence Cause of Action;
6. For interest based on damages, as well as pre-judgment and post-judgment interest as allowed by law;
7. For attorney’s fees pursuant to California Code of Civil Procedure sections 1021.5 or as otherwise allowable by law;
8. For such other and further relief as the Court may deem proper.

Dated: September 12, 2023

McNICHOLAS & McNICHOLAS, LLP

By: /s/ Matthew S. McNicholas
Matthew S. McNicholas
Douglas D. Winter
Ali Faal
Attorneys for Plaintiffs

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DEMAND FOR JURY TRIAL

Plaintiffs JOHN DOE 1, an individual; JOHN DOE 2, an individual; JOHN DOE 3, an individual; JOHN DOE 4, an individual; JOHN DOE 5, an individual; JOHN DOE 6, an individual; JOHN DOE 7, an individual; JOHN DOE 8, an individual; JOHN DOE 9, an individual; JOHN DOE 10, an individual; JOHN DOE 11, an individual; JOHN DOE 12, an individual; JOHN DOE 13, an individual; JOHN DOE 15, an individual; JOHN DOE 16, an individual; JOHN DOE 17, an individual; JOHN DOE 18, an individual; JOHN DOE 19, an individual; JOHN DOE 20, an individual; JOHN DOE 21, an individual; JOHN DOE 22, an individual; JOHN DOE 23, an individual; JOHN DOE 24, an individual; JOHN DOE 25, an individual; JOHN DOE 26, an individual; JOHN DOE 27, an individual; JOHN DOE 28, an individual; JOHN DOE 29, an individual; JOHN DOE 30, an individual; JOHN DOE 31, an individual; JOHN DOE 32, an individual; JOHN DOE 33, an individual; JOHN DOE 34, an individual; JOHN DOE 35, an individual; JOHN DOE 36, an individual; JOHN DOE 37, an individual; JOHN DOE 38, an individual; JOHN DOE 39, an individual; JOHN DOE 40, an individual; JOHN DOE 41, an individual; JOHN DOE 42, an individual; JOHN DOE 43, an individual; JOHN DOE 44, an individual; JOHN DOE 45, an individual; JOHN DOE 46, an individual; JOHN DOE 47, an individual; JOHN DOE 48, an individual; JOHN DOE 49, an individual; JOHN DOE 50, an individual; JOHN DOE 51, an individual; JOHN DOE 52, an individual; JOHN DOE 53, an individual; JOHN DOE 54, an individual; JOHN DOE 55, an individual; JOHN DOE 56, an individual; JOHN DOE 57, an individual; JOHN DOE 58, an individual; JOHN DOE 59, an individual; JOHN DOE 60, an individual; JOHN DOE 61, an individual; JOHN DOE 62, an individual; JOHN DOE 63, an individual; JOHN DOE 64, an individual; JOHN DOE 65, an individual; JOHN DOE 66, an individual; JOHN DOE 67, an individual; JOHN DOE 68, an individual; JOHN DOE 69, an individual; JOHN DOE 70, an individual; JOHN DOE 71, an individual; JOHN DOE 72, an individual; JOHN DOE 73, an individual; JOHN DOE 74, an individual; JOHN DOE 75, an individual; JOHN DOE 76, an individual; JOHN DOE 77, an individual; JOHN DOE 78, an individual; JOHN DOE 79, an individual; JOHN DOE 80, an individual; JOHN DOE 81, an individual; JOHN DOE 82, an

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12 individual; JOHN DOE 200, an individual; JOHN DOE 201, an individual; JOHN DOE 202, an
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24 individual; JOHN DOE 236, an individual; JOHN DOE 237, an individual; JOHN DOE 238, an
25 individual; JOHN DOE 239, an individual; JOHN DOE 240, an individual; JOHN DOE 241, an
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8 individual; JOHN DOE 698, an individual; JOHN DOE 699, an individual; JOHN DOE 700, an
9 individual; JOHN DOE 701, an individual, and JOHN DOE 703, an individual, hereby demand a
10 trial by jury.

11
12 Dated: September 12, 2023

McNICHOLAS & McNICHOLAS, LLP

13
14 By: /s/ Matthew S. McNicholas

15 Matthew S. McNicholas
16 Douglas D. Winter
17 Ali Faal
18 Attorneys for Plaintiff
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EXHIBIT “1”



Hasmik Badalan Collins
Tel: (213) 978-8397
Hasmik.Collins@lacity.org

MICHAEL N. FEUER
CITY ATTORNEY

September 16, 2022

Shakeer Rahman, Esq.
LAW OFFICE OF SHAKEER RAHMAN
838 East 6th Street
Los Angeles, CA 90021

Via messenger pick-up

Colleen Flynn, Esq.
LAW OFFICE OF COLLEEN FLYNN
3435 Wilshire Boulevard, Suite 2910
Los Angeles, CA 90010

Dear Ms. Flynn and Mr. Rahman,

As discussed and agreed upon by counsel, I am enclosing documents responsive to your client's California Public Records Act (CPRA) request (Request #21-8914).

Included in this envelope is a roster of all active duty officers as of July 3, 2022. This is the roster LAPD used in pulling pictures of officers as described below.

Also enclosed in the envelope is a black flash drive. The enclosed flash drive includes pictures of all full-time, active duty, sworn police officers as of July 3, 2022 that were available in our system.

As discussed and agreed upon by all counsel, images of officers working in an undercover capacity as of the time the pictures were downloaded (end of July 2022) are not included. Additionally, there is a small number of individuals (less than approximately 100) who did not have photographs in the system based on when their last ID badge picture was taken.

City Hall East 200 N. Main Street Room 800 Los Angeles, CA 90012 (213) 978-8100 Fax (213) 978-8312

Ms. Flynn and Mr. Rahman
Page 2
September 16, 2022

I believe this completely and accurately describes the scope of the parameters used in producing pictures responsive to the CPRA request that the parties agreed to. Please let me know if I am missing something. It is my understanding that this production fulfills the CPRA request at issue in the writ entitled *Ben Camacho v. City of Los Angeles* (22STCP02029). I further understand that all that remains after your client's review of the production is the issue of Attorney's fees and a full settlement of the action. I look forward to expeditiously resolving these issues with you both.

Sincerely,

MICHAEL N. FEUER, City Attorney

/s/ Hasmik Collins

By
Hasmik Badalian Collins
Deputy City Attorney

HC/lp

EXHIBIT “2”

From: DOC Communications Division <doc@lapd.online>

Date: March 18, 2023 at 4:52:58 PM PDT

To: DOC Communications Division <doc@lapd.online>

Subject: Chief's Message

A Statement from Chief Michel Moore:

As you are all aware, on Friday, March 18th, a third party website posted the photographs and assignments of all active duty sworn members of the Department. I only learned of this posting after it had occurred and had in fact expressed my opposition to such a release in a media interview earlier that day, unless it was required by law. I apologize to each member of this Department impacted, and your families, for not having provided you with advance notice of this release. While I recognize that apology may be of little significance to you, each of you should be able to depend on me and this Department to demonstrate the appropriate sensitivity in these types of situations.

I've directed an immediate investigation into the circumstances of the release of this information, which actually occurred last September pursuant to a California Public Record Act request. This third party website apparently gained access to the release. The investigation will include the timeline of events, those involved, the underlying analysis and rationale in reaching the decision to release the information, and protocols employed. Additionally, it appears that once the decision was made to release the information, that appropriate safeguards were not put in place to ensure those assigned to sensitive investigations were not included, and that steps were taken to alert our membership of the required release. Those involved in the decisions and actions that occurred in this release are to be held accountable, just as you are when going about your work each day. This isn't meant to be a 'scape goat' investigation, but one that identifies how this occurred and those responsible.

Unfortunately, we cannot go back in time and take a different path. I have directed that the Department immediately do everything possible to identify what can be done for the safety and security of each of you and your families, which is my paramount concern. This will also include working with the Los Angeles Police Protective League and Command Officers Association.

Additionally, we have already initiated an ongoing awareness for the development of any **threats** stemming from those who attempt to use information garnered from the involved website for some nefarious purpose. Should such information develop, we will notify the involved member immediately and take immediate action. I've also directed the strengthening of the review process of such releases in the future to ensure such a mistake is not repeated.

As an individual who has faced the continual vitriol, hate speech, and credible **threats** to my personal safety and that of my family, I recognize how disturbing this circumstance is and how my words may do little to soothe your anger and frustration. Our work in the days and weeks ahead is to rebuild your confidence in me and the Department, which includes the first step of acknowledging our mistake and ensuring it is never repeated.

Respectfully
Michel R. Moore
Chief of Police

EXHIBIT “3”

1 HYDEE FELDSTEIN SOTO, City Attorney
2 SCOTT MARCUS, Chief Assistant City Attorney
3 GABRIEL S. DERMER, Assistant City Attorney (SBN 229424)
4 **FELIX LEBRON, Deputy City Attorney (SBN 232984)**
5 **CHRISTEN A. SPROULE, Deputy City Attorney (SBN 310120)**
6 Office of the Los Angeles City Attorney
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Superior Court of California,
County of Los Angeles
4/06/2023 2:57 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By G. Robinson, Deputy Clerk

Attorneys for Plaintiff
CITY OF LOS ANGELES

[No Fee- Govt. Code §6103]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

CITY OF LOS ANGELES, a municipal
corporation;

Plaintiff,

v.

BEN CAMACHO, STOP LAPD SPYING
COALITION and DOES 1-50 inclusive.

Defendants.

Case No. **23STCP01060**

COMPLAINT FOR:

- (1) POSSESSION OF PERSONAL
PROPERTY BY CLAIM AND
DELIVERY (CIV. CODE § 3379 et seq.);**
- (2) DECLARATORY RELIEF; AND**
- (3) PETITION FOR RETURN OF
GOVERNMENT RECORDS (GOV.
CODE § 6204 et seq.)**

Plaintiff City of Los Angeles, by way of complaint against the Defendants named herein, alleges
as follows:

INTRODUCTION

The City seeks emergency judicial intervention to protect the lives of law enforcement officers
currently serving in sensitive assignments whose identities were compromised by the inadvertent release
of their photographs pursuant to a California Public Records Act response. To date, efforts to retrieve

1 the photographs voluntarily have been rebuffed. Thus, while a strong public interest exists in
2 governmental transparency, the public has an equally strong, and sometimes conflicting interest, in
3 public safety, which requires maintaining the safety, security, and efficacy of its law enforcement
4 agencies and officers. Select sworn law enforcement officers serve in sensitive assignments, including
5 as undercover officers, who work covertly by concealing their identities as agents of the law to gather
6 information about criminal activities. These officers voluntarily expose themselves to serious risks to
7 their personal safety to gather evidence necessary to prosecute crimes. Exposure of their true identities
8 compromises current and future criminal investigations and exposes these officers to real and present
9 danger of harm by the criminals with whom they engage.

10 Defendants Ben Camacho, Stop LAPD Spying Coalition, and Does 1-50 are willfully exposing
11 to the public the identities of Los Angeles Police Department (“LAPD”) officers in undercover
12 assignments on the website Watch the Watchers, despite knowing that they are not entitled to possess
13 this information. Photographs of these officers were inadvertently included in a production related to a
14 California Public Records Act request and writ petition. The City seeks the return of these inadvertently
15 produced photos to protect the lives and work of these undercover officers.

17 **GENERAL ALLEGATIONS**

18 1. At all times relevant herein, Plaintiff, the City of Los Angeles (hereinafter “the City” or
19 “Plaintiff”), has been a municipal corporation and a charter city, incorporated pursuant to the laws of
20 the State of California, and located in the County of Los Angeles.

21 2. Plaintiff is informed and believes, and thereon alleges, that Defendant Ben Camacho
22 (“Camacho”) is an individual who resides in the City of Los Angeles.

23 3. Plaintiff is informed and believes, and thereon alleges, that Defendant Stop LAPD Spying
24 Coalition (“SLSC”) is a nonprofit community association based in the City of Los Angeles, operating
25 in the State of California and County of Los Angeles. Plaintiff is further informed and believes that at
26 all times relevant herein, SLSC is the owner and/or operator of the website “Watch the Watchers.”

27 ///

1 4. The true names of those of the Defendants sued as Does 1 through 50, inclusive, are
2 unknown to the City, so the City sues these Defendants using fictitious names. The City will amend
3 this Complaint to allege the true names and capacities of these Doe Defendants when their identities are
4 ascertained. As set forth herein, the City is informed and believes and thereon alleges that each of the
5 Defendants designated herein as a Doe is responsible in some manner for the occurrences alleged
6 herein.

7 5. Plaintiff is informed and believes, and thereon alleges, that at all times mentioned herein,
8 each Defendant was the principal, agent, master, servant, subsidiary, partner, member, associate,
9 representative, co-conspirator, employer and/or employee of the other Defendants, and in committing
10 the acts and omissions herein mentioned was acting in the course and scope of said relationship. At all
11 times mentioned herein, each Defendant, whether named or unnamed, was chargeable with and bound
12 by the knowledge and information received by and on behalf of each of the other Defendants. Plaintiff
13 is further informed and believes, and thereon alleges, that at all times relevant herein, the acts of the
14 Defendants were done in the course and scope of the principal, agent, master, servant, subsidiary,
15 partner, member, associate, representative, co-conspirator, employer and/or employee relationship
16 which that Defendant had with the other Defendants. Plaintiff is informed and believes, and thereon
17 alleges, that each of the Defendants sued herein is responsible in some manner for the occurrences
18 alleged herein.
19

20 6. All references in this complaint to “Defendants” includes all Doe Defendants, and any
21 and all such references shall include each Defendant individually as well as all of the Defendants
22 jointly, unless otherwise noted.

23 7. The Superior Court in the County of Los Angeles has jurisdiction over this matter, as the
24 incidents, property and harms which give rise to the claims alleged in this complaint occurred and/or
25 are located in that county.

26 8. On or around October 11, 2021, defendant Camacho made a request under the California
27 Public Records Act, Gov. Code § 7920.000 *et seq.* (“CPRA”), to LAPD, Request No. 21-8914, which
28

1 sought “[T]he most up-to-date roster of LAPD names, badge numbers, serial numbers, division, sworn
2 status. The department headshot photos of all of the same officers referenced above.”

3 9. On or around January 25, 2022, LAPD responded to Camacho’s CPRA request. LAPD
4 produced certain documents, including a roster containing names and other requested information, but
5 denied the request for photographs of officers.

6 10. On or around May 27, 2022, Camacho filed a Petition for Writ of Mandate or in the
7 Alternative a Complaint for Declaratory and Injunctive Relief against the City relating to the City’s
8 CPRA response, *Ben Camacho v. City of Los Angeles*, LASC Case No. 22STCP02029.

9 11. The City and Camacho subsequently agreed to settle the dispute. The City agreed to
10 provide pictures of all full-time, active duty, sworn officers as of July 3, 2022 that were available in
11 LAPD’s system, except for images of officers working in an undercover capacity. The City objected to
12 production of any records that are exempt under the CPRA, including photographs of any officers
13 assigned to undercover duties. Camacho’s counsel agreed that any production of photographs or
14 images would expressly exclude images of officers working in an undercover capacity.

15 12. On September 16, 2022, a flash drive containing photographs was produced to
16 Camacho’s counsel. The City’s cover letter enclosing the flash drive expressly stated “[a]s discussed
17 and agreed upon by all counsel, images of officers working in an undercover capacity as of the time the
18 pictures were downloaded (end of July 2022) are not included.” Unbeknownst to the City, the flash
19 drive provided to Camacho’s counsel on September 16, 2022 inadvertently produced exempt records
20 containing images of officers working in an undercover capacity.

21 13. On or around December 13, 2022, the Court entered a dismissal with prejudice of
22 Camacho’s action against the City in LASC Case No. 22STCP02029 pursuant to the settlement
23 agreement.

24 14. On information and belief, Camacho provided SLSC and other Doe Defendants with the
25 exempt records inadvertently disclosed on the flash drive of photographs produced on September 16,
26 2023.
27
28

1 15. On or around March 16, 2023, the City discovered that the flash drive provided to
2 Camacho’s counsel contained photographs and images of officers working in an undercover capacity
3 based on a report from the Los Angeles Times.

4 16. On or around March 17, 2023, defendant SLSC launched a website entitled “Watch the
5 Watchers” that posted images and identifying information of LAPD officers, including the
6 inadvertently produced records of photos of officers working in an undercover capacity.

7 17. Photographs and images of officers working in undercover capacities are exempt from
8 disclosure under the CPRA and California law, including Government Code Section 7922.000
9 (formerly Section 6255(a)), and California case law. (*Commission on Peace Officer Standards &*
10 *Training v. Superior Court* (2007) 42 Cal.4th 278, 301.)

11 18. Defendants’ possession of undercover officers’ identifying information and photographs,
12 including on Defendants’ website Watch the Watchers, subjects these officers and their families to
13 potential threats and the possibility of danger, and harms the efficacy of LAPD’s undercover operations
14 that require anonymity.

15 19. On March 30, 2023, the City sent Camacho a demand for return of government records
16 pursuant to Government Code section 6204.2 in a letter demanding the return of the flash drive and
17 destruction of all electronic and physical copies of photographs obtained from that production.

18 20. On April 3, 2023, the City sent SLSC a demand for return of government records
19 pursuant to Government Code section 6204.2 in a letter demanding the return of the flash drive and
20 destruction of all electronic and physical copies of photographs obtained from that production.

21 21. The City and public have a strong interest in maintaining the safety and efficacy of its
22 law enforcement agencies, including by withholding government records, including photographs,
23 identifying officers operating undercover.

24 22. The inadvertent disclosure of documents exempt from production under the CPRA does
25 not waive the exemption. (*Ardon v. City of Los Angeles* (2016) 62 Cal.4th 1176).

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1 **SECOND CAUSE OF ACTION**

2 (For Declaratory Relief Against Camacho, SLSC and Does 1-50)

3 (C.C.P. § 1060)

4 29. The City hereby incorporates by this reference paragraphs 1 through 28 of this complaint
5 as though fully and completely set forth herein.

6 30. An actual and justifiable controversy exists between the City and Defendants regarding
7 the ownership, use and return of inadvertently produced photographs exempt from production under the
8 CPRA, Government Code § 7920.000 *et seq.*

9 31. The City contends that Defendants have no lawful right to possession or use of records
10 exempt from production under the CPRA that are inadvertently produced in response to a CPRA
11 request and that such records must be returned to the City and all physical or electronic copies
12 destroyed.

13 32. The City is informed and believes that Defendants dispute these contentions.

14 33. The City desired a determination of the rights and duties of the City and Defendants as to
15 the above-referenced contentions. Such a declaration and an implementing injunction ordering the
16 return of the exempt records, the destruction of all electronic copies, and further prohibition on
17 publishing said records online, are necessary and appropriate to declare and enforce the parties' rights
18 and obligations.
19

20 **THIRD CAUSE OF ACTION**

21 (Petition for Order Requiring the Return of Government Records Against Camacho,

22 SLSC and Does 1-50)

23 (Gov. Code § 6204 *et seq.*)

24 34. The City hereby incorporates by this reference paragraphs 1 through 33 of this complaint
25 as though fully and completely set forth herein.

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1 the flash drive and return of all photographs and destruction of all electronic and physical copies in
2 Defendants' possession, custody or control;

3 5. Litigation costs and attorneys' fees as permitted by Government Code § 6204.4; and

4 6. For such other and further relief as the Court may deem just and proper.
5

6 DATED: April 5, 2023

HYDEE FELDSTEIN SOTO, City Attorney
SCOTT MARCUS, Chief, Civil Litigation Branch
GABRIEL S. DERMER, Assistant City Attorney
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