

1 identification information. Following said disclosures, Plaintiffs' photographs, serial numbers,  
2 and personal identification information were posted throughout the internet. Thereafter,  
3 Plaintiffs were subjected to irreparable life-threatening harm by third parties such as actual  
4 threats from the website Killercop.com. In fact, Killercop.com posted on its Twitter.com page  
5 offering bounties on the lives of male LAPD officers (said to be \$1,000.05) and female LAPD  
6 officers (said to be \$2,000.10). Prior to the photo release, Plaintiffs identities were concealed.  
7 As a result of being unmasked, Plaintiffs now reasonably fear future harassment, intimidation,  
8 injury, and death to themselves and their families. Plaintiffs will now need to do what is  
9 necessary to protect themselves and their families' lives. Defendants' negligent and reckless  
10 conduct is ongoing.

11 26. As a result of the above-described gross negligence, Plaintiffs have suffered, and  
12 continue to suffer shock, emotional distress, loss of enjoyment of life; possible early retirement,  
13 a different career path, the costs of enhanced protection, and the costs of possibly moving in  
14 order to keep themselves and their families safe.

15 **SECOND CAUSE OF ACTION**  
16 **FAILURE TO PERFORM MANDATORY DUTIES ESTABLISHED BY LAW**  
17 **GOVERNMENT CODE § 815.6**  
18 **(BY PLAINTIFFS DOES 1 Through 200 AGAINST ALL DEFENDANTS)**

19 27. Plaintiffs re-allege and incorporate by reference each and every allegation  
20 contained in paragraphs 1–26 of this complaint as though fully set forth herein again.

21 28. Defendant CITY OF LOS ANGELES is and was, at all times relevant to this  
22 complaint, a City which owns, operates and/or manages the Los Angeles Police Department and  
23 the Los Angeles City Attorney's office.

24 29. The conduct of Defendant CITY OF LOS ANGELES, and DOES 1 through 100  
25 and its managers, supervisors, agents, and employees, are governed by numerous statutes,  
26 ordinances, rules, regulations, and other legal provisions. These statutes, ordinances,  
27 regulations, and other legal provisions were enacted for the purpose of protecting Public Safety  
28 Officers against the risk of injury sustained by Plaintiffs and establish mandatory duties on the  
part of CITY OF LOS ANGELES and DOES 1 through 100.

30. From September 2022 through at least March 2023, Defendant CITY OF LOS  
ANGELES, and DOES 1 through 100 its managers, supervisors, agents, and employees, failed