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5 ORGANIZATION, ORANGE COUNTY
6
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF ORANGE**

10 COMMUNITY SERVICE ORGANIZATION
11 ORANGE COUNTY,

12 Petitioner/Plaintiff,

13 vs.

14 THE CITY OF SANTA ANA, THE SANTA
ANA POLICE DEPARTMENT,

15 Respondents/Defendants.
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Case No.

**VERIFIED COMPLAINT AND PETITION
FOR WRIT OF MANDATE AND
DECLARATORY AND INJUNCTIVE
RELIEF**

[Gov. Code, §§ 7923.000, et seq.; Code Civ.
Proc. §§ 526a, 1060, 1085, et seq.; Civ. Code §
3422]

1 **INTRODUCTION**

2 1. This Complaint and Petition regards the Santa Ana Police Department's policy or
3 practice of refusing to publish investigatory records when its officers kill or inflict great bodily
4 injury on members of the public until all administrative investigations into those acts are complete.
5 This is a direct violation of Penal Code section 832.7 (b) (8) which makes such records non-
6 confidential and requires their release within 180 days unless there is a criminal investigation or
7 criminal prosecution related to the incident. (Pen Code § 832.7 (b) (8))

8 2. Here, the Community Service Organization, Orange County (hereafter "CSO OC"),
9 seeks records regarding the death of Freddie Washington, which occurred while he was in the
10 Santa Ana Police Department's custody. The Santa Ana Police Department refuses to make these
11 records available until all investigations are completed regardless of statutory deadlines. They
12 cannot say when the investigations will be completed. CSO OC has unsuccessfully sought these
13 records for more than nine months already.

14 3. Because of the City of Santa Ana's and the Santa Ana Police Department's blatant
15 disregard for the deadlines imposed by Penal Code section 832.7, Petitioner/Plaintiff respectfully
16 asks this Court to issue a writ of mandate compelling Defendants to comply with their obligations
17 and provide the requested records to Petitioner/Plaintiff, as well as to order declaratory and
18 injunctive relief to the same effect, and to order the Santa Ana Police Department to repeal its
19 policy or practice of refusing to publish records describing acts of police officers that cause great
20 bodily injury or death until all investigations into those acts are complete. Absent the issuance of a
21 writ of mandate and the other relief requested, Petitioner/Plaintiff has no plain, speedy, or
22 adequate remedy at law to enforce their rights.

23 **JURISDICTION AND VENUE**

24 4. This Court has jurisdiction under: Civil Code section 3422; Code of Civil
25 Procedure sections 1060, 1085, and 526a; Government Code sections 7923.000 and 7923.100; and
26 Article VI, section 10 of the California Constitution.

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5. Venue is proper in this Court because Respondents/Defendants, the acts and omissions complained of herein, and the records in question, or some portion of them, are situated in this County. (See Code Civ. Proc. §§ 394, 395; Gov. Code, § 7923.000, 7923.100.)

6. Petitioner/Plaintiff has performed all conditions precedent to filing the instant action including exhausting all available administrative remedies, leaving no plain, speedy, and adequate remedy unless this Court grants this Complaint and Petition.

PARTIES

7. Petitioner/Plaintiff, the Community Service Organization of Orange County, is an unincorporated association founded in 2022 and headquartered in the County of Orange. It is affiliated with the original Community Service Organization, which was founded in Los Angeles in 1947. CSO OC is an entirely volunteer, member-run organization. CSO OC's mission is to fight for Chicano self-determination, legalization for all of the undocumented, and community control of the police.

8. As part of its mission to promote police accountability, CSO OC investigates Santa Ana police officers' shooting and killing of members of the public. To conduct one such investigation, CSO OC sought disclosure from the City of Santa Ana of public records related to the arrest and death of Freddie Washington, who died on January 16, 2025 in the custody of Santa Ana Police Department. CSO OC is a member of the public and CSO OC's members are members of the public with the right to enforce their requests for records under Government Code sections 7920.515 and 7920.520. CSO OC's members pay income and other taxes in Orange County, California.

9. Respondent/Defendant, the City of Santa Ana, is a city within the meaning of Government Code section 7920.510. The Santa Ana Police Department is an agency of the City of Santa Ana and is within the meaning of Government Code section 7920.510.

LEGAL AND FACTUAL BACKGROUND

I. The Statutory and Constitutional Rights to Investigatory Records When Police Kill or Inflict Great Bodily Injury on Members of the Public

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1 10. The California Constitution provides that “[t]he people have the right of access to
2 information concerning the conduct of the people’s business, and, therefore, the meetings of public
3 bodies and the writings of public officials and agencies shall be open to public scrutiny.” (Cal.
4 Const., art. 1, § 3(b)(1).) The Constitution requires that any “statute, court rule, or other authority,”
5 such as the Public Records Act (hereafter “PRA”), “be broadly construed if it furthers the people’s
6 right of access, and narrowly construed if it limits the right of access.” (*Id.* § 3(b)(2).)

7 11. Under the PRA, “access to information concerning the conduct of the people’s
8 business”—business conducted by public agencies on behalf of the people—is a “fundamental and
9 necessary right of every person in this state.” (Gov’t Code § 7921.000.)

10 12. The PRA requires that, in response to records requests from members of the public,
11 public agencies “make the records promptly available,” so long as the records are not expressly
12 exempt. (Gov’t Code § 7922.530.) The PRA defines a record to include “any writing containing
13 information relating to the conduct of the public’s business prepared, owned, used, or retained by
14 any state or local agency regardless of physical form or characteristics.” (Gov’t Code § 7922.545.)

15 13. Traditionally, records involving investigations into police who kill or inflict great
16 bodily injury on members of the public by police officers were confidential and exempt from the
17 PRA. However, in 2018, the Legislature passed Senate Bill 1421, which amended California Penal
18 Code Section 832.7 to strip those records of their confidential status and mandate that they must
19 be released within certain amounts of time, subject only to specific exemptions. (Stats. 2018, ch,
20 988, § 2.)

21 **II. The Death of Freddie Washington**

22 14. On January 15th, 2025, six Santa Ana Police Department officers entered Freddie
23 Washington’s hotel room and arrested him. In doing so, one officer struck Mr. Washington in the
24 head while others restrained him and then immobilized him using a “WRAP,” a full-body restraint
25 system similar to a sleeping bag with heavy straps.

26 15. On January 16th, Mr. Washington became temporarily unconscious. Upon waking,
27 officers put Mr. Washington in a cell in a restraint chair and spit mask. While restrained, Mr.
28

1 Washington stopped breathing. Officers took Mr. Washington out of his cell for medical attention
2 but were unable to save his life.

3 **III. CSO OC's Request for Documents**

4 16. On October 13, 2025, CSO OC submitted CPRA Request No. 25-2544 to the City
5 of Santa Ana seeking records regarding the death of Freddie Washington, including:

- 6 • All records relating to the report, investigation, findings, and administrative
7 discipline related to the death.
- 8 • All investigative reports.
- 9 • All full, unedited footage related to the incident, including officer body-worn
camera footage.

10 A true and correct copy of this request is attached as **Exhibit 1.**

11 17. The City of Santa Ana responded by stating the request was duplicative and so they
12 would process it under Request No. 25-763, indicating they had released a portion of records and
13 would notify CSO OC when they added new information.

14 18. The records previously released by SAPD under Request No. 25-763 consisted of a
15 small batch of materials voluntarily released by SAPD Records, including edited video footage
16 with SAPD narrative and three redacted documents totaling thirteen pages. These materials were
17 not close to the full file of responsive records. A true and correct copy of Request No. 25-763 is
18 attached as **Exhibit 2.**

19 19. On November 5, 2025, CSO OC submitted a second request, CPRA Request No.
20 25-2759, seeking records regarding the in-custody death of Freddie Washington, including:

- 21 • All records relating to the report, investigation, findings, and administrative
22 discipline.
- 23 • All full, unedited audio and video footage, including body-worn camera footage of
24 all officers involved.
- 25 • All audio/video from dispatch request through officer arrival, hotel footage as the
incident escalated, transport footage back to the station, and any subsequent
audio/video through the in-custody death.

26 A true and correct copy of this request is attached as **Exhibit 3.**

27 20. The City of Santa Ana responded by directing CSO OC to a portal link for Request
28 No. 25-760 and stated they created the portal to eliminate duplicative requests. However, Request

1 No. 25-760 involved an entirely different matter, not involving the death of Freddie Washington,
2 and was not duplicative of CSO OC's request. CSO OC notified the City of the mistake. On
3 December 17, 2025, the City reopened the request.

4 21. For the following six months, the City of Santa Ana emailed periodic notices
5 (about once every three weeks) stating it needs more time or that it will produce the documents on
6 a rolling basis. However, as of June 15, 2026, the City had still not produced any new records
7 relevant to the death of Freddie Washington.

8 22. On June 15th, through counsel, CSO OC sent a demand letter to the City of Santa
9 Ana stating they would file suit in Superior Court if the Department did not produce new
10 documents by June 26th. A true and correct copy of this demand letter is attached as **Exhibit 4**.

11 23. On June 26th, the City responded in writing. A true and correct copy of this
12 response is attached as **Exhibit 5**. The response stated that, "In response to your June 15 letter,
13 City will produce responsive records to this request." The response also stated that "With this
14 response the City has uploaded responsive records via the Next Request link for PRR 25-2759.
15 City has additional records and will begin producing any non-exempt and responsive records by
16 means of a rolling production on or about July 8, 2026." The letter also states, "The City will
17 provide an update to this response no later than July 10, 2026."

18 24. On July 1st, CSO OC checked the Next Request portal and found no documents had
19 been uploaded despite the City's claim that had already happened the week prior. CSO OC
20 reached out to the city through counsel and the City confirmed it had not uploaded any new
21 documents but would. A true and correct copy of this correspondence is attached as **Exhibit 6**.

22 25. On July 2nd, CSO OC checked the Next Request portal found that the Department
23 had uploaded a significant number of new documents; however, these documents primarily
24 regarded only Mr. Washington's arrest and not his death and did not include all body camera
25 videos. On Jul 10th, the City emailed the documents uploaded to the Next Request portal to CSO
26 OC.

27 26. On July 13th, CSO OC reached out to the City through counsel to inquire about the
28 City's promised letter that would "update" their previous response. Counsel for the City responded

1 that a response would be coming directly from the Santa Ana Police Department's records
2 manager. A true and correct copy of this correspondence is attached as **Exhibit 7.**

3 27. On July 14th, the records manager for the Santa Ana Police Department wrote
4 counsel for CSO OC, stating,

5 "The Department has been working on releasing SB1421 responsive documents relating to
6 the in-custody death of Mr. Freddie DeAngelo Washington in response to your Public
7 Records Request. At this time, the initial arrest report, death report, associated body-worn
8 camera footage, and photos have been released. The internal affairs administrative
9 investigation is still on-going as is the independent review by the DA's Office; once these
10 investigations are completed, the reports and supporting evidence and documentation will
11 be released and posted on a rolling basis on the City's document repository for Police
12 Critical Incidents. I do not have an estimated time frame for this release as portions of the
13 investigations are being conducted by outside agencies. The Records Unit will advise you
14 via email as soon as we have an update or additional records to produce."

15 A true and correct copy of this correspondence is attached as **Exhibit 8.**

16 28. At this point, the 180 days allowed for administrative investigations under Penal
17 Code section 832.7 (b) (8) (C) has long passed and yet the Santa Ana Police Department continues
18 to withhold non-confidential investigatory documents. Furthermore, the Department appears to do
19 so as a matter of policy. Accordingly, this Action is brought.

20 **FIRST CAUSE OF ACTION**

21 **For Writ of Mandate for Violation of the California Public Records Act, Article I, § 3 of the** 22 **California Constitution, & Code of Civ. Proc. § 1085**

23 29. Petitioner/Plaintiff incorporates by reference the foregoing paragraphs as though
24 fully set forth herein.

25 30. Public entities have a ministerial duty to respond to requests for public records, and
26 search for and disclose all nonexempt records, pursuant to the PRA, Government Code sections
27 7923.000 *et seq.*, and the California Constitution, Article I, § 3.

28 31. The City of Santa Ana and the Santa Ana Police Department have failed to fulfill
their ministerial duties under the PRA and the California Constitution to timely search for and
promptly produce public records responsive to Petitioner/Plaintiff's record requests.

32. Issuance of a writ of mandate compelling the City of Santa Ana and the Santa Ana
Police Department to perform their duties under the PRA and the California Constitution is

1 required because there exists no plain, speedy, and adequate remedy in the ordinary course of law
2 that would protect the Petitioner/Plaintiff's rights and interests to the information sought here.

3 **SECOND CAUSE OF ACTION**

4 **For Declaratory Relief for Violation of the California Public Records Act, Article I, § 3 of**
5 **the California Constitution, & Code of Civ. Proc., §§ 526a, 1060**

6 33. Petitioner/Plaintiff incorporates by reference the foregoing paragraphs as though
7 fully set forth herein.

8 34. Public entities are obligated to respond to requests for public records, and search
9 for and disclose all nonexempt records, pursuant to the PRA, Government Code sections 7923.000
10 *et seq.*, and the California Constitution, Article I, § 3.

11 35. The City of Santa Ana and the Santa Ana Police Department have failed to fulfill
12 their obligations under the PRA and the California Constitution to timely search for and promptly
13 produce public records responsive to Petitioner/Plaintiff's record requests, and absent judicial
14 intervention, they will continue to do so.

15 36. The City of Santa Ana and the Santa Ana Police Department have an express policy
16 or are engaged in an ongoing pattern or practice of refusing to satisfy its obligations under the PRA by
17 withholding nonconfidential investigatory documents in violation of deadlines imposed by California
18 Penal Code section 832.7.

19 37. The City of Santa Ana's and the Santa Ana Police Department's conduct is an illegal
20 expenditure of public funds in violation of a non-discretionary duty.

21 38. An actual controversy exists between the parties concerning whether the City of Santa
22 Ana and the Santa Ana Police Department have engaged in conduct or established policies that
23 violate the PRA and Constitution. A judicial determination to resolve this actual controversy is
24 necessary and appropriate at this time.

25 39. A declaration that the City of Santa Ana and the Santa Ana Police Department has
26 violated the PRA and the California Constitution by failing to promptly produce disclosable
27 records, and has a policy or pattern and practice of doing so, is therefore appropriate.

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1 **THIRD CAUSE OF ACTION**

2 **For Injunctive Relief for Violation of the California Public Records Act, Article I, § 3 of the**
3 **California Constitution, Code of Civ. Proc., §§ 526a, 1085, & Civ. Code § 3422**

4 40. Petitioner/Plaintiff incorporates by reference the foregoing paragraphs as though fully
5 set forth herein.

6 41. The City of Santa Ana and the Santa Ana Police Department have an express policy
7 or are engaged in an ongoing pattern or practice of refusing to satisfy its obligations under the PRA by
8 withholding nonconfidential investigatory documents in violation of deadlines imposed by California
9 Penal Code section 832.7.

10 42. The City of Santa Ana's and the Santa Ana Police Department's conduct is an illegal
11 expenditure of public funds in violation of a non-discretionary duty.

12 43. Absent intervention by this Court, the City of Santa Ana and the Santa Ana Police
13 Department will continue to deny requests, disregard statutorily required duties, fail to produce
14 records to which the public should have access, force costly litigation, and prevent parties from
15 obtaining information under the PRA.

16 44. This conduct harms Petitioner/Plaintiff on an ongoing basis, as Petitioner/Plaintiff
17 continues to seek access to records to investigate Santa Ana Police Department officers who kill or
18 inflict great bodily injury on members of the public.

19 45. An injunction should issue against the City of Santa Ana and the Santa Ana Police
20 Department prohibiting this conduct and compelling prospective compliance with the PRA.

21 46. Petitioner/Plaintiff does not have a plain, speedy, and adequate remedy in the ordinary
22 course of law.

23 **PRAYER FOR RELIEF**

24 WHEREFORE, Petitioner/Plaintiff prays for judgment as follows:

25 47. For issuance of a peremptory writ of mandate compelling the City of Santa Ana
26 and the Santa Ana Police Department to immediately produce all non-exempt, requested public
27 records in their possession;

28 //

1 48. For a declaration that the City of Santa Ana's and the Santa Ana Police
2 Department's conduct violates the PRA and the California Constitution in failing to respond to
3 Petitioner/Plaintiff's PRA requests and to produce all non-exempt, requested public records in
4 their possession;

5 49. For an injunction requiring the City of Santa Ana and the Santa Ana Police
6 Department to produce all non-exempt, requested public records forthwith;

7 50. For a declaration that the City of Santa Ana and the Santa Ana Police Department
8 have a policy or are engaged in an ongoing pattern or practice of refusing to satisfy their obligations
9 under the PRA by withholding nonconfidential investigatory documents in violation of deadlines
10 imposed by California Penal Code section 832.7;

11 51. For prospective injunctive relief against the City of Santa Ana and the Santa Ana
12 Police Department, including, but not limited to, an injunction compelling the production of non-
13 exempt records of internal investigations of Santa Ana Police Department officers, consistent with the
14 statutory requirements under the PRA and California Penal Code section 832.7;

15 52. For reasonable attorneys' fees pursuant to Code of Civil Procedure section 1021.5
16 and Government Code section 7923.115;

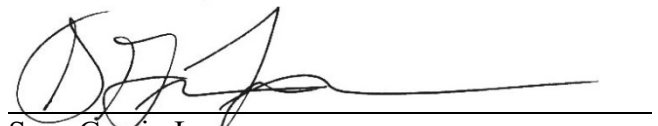
17 53. For costs of suit; and

18 54. For such other and further relief as the Court may deem just and proper.

19 DATED: July 22, 2026

PEACE AND JUSTICE LAW CENTER

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22 By:


23 Sean Garcia-Leys
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EXHIBIT 1

to Verified Complaint and Petition for Writ of Mandate

Request 25-2544

 Closed

2 of 21 with filters active

Dates

Received

October 13, 2025 via web

Requester

 CSO OC PRA

Staff assigned

Departments

Police Department

Point of contact

Jessica Antes

Request

Request for Public Records regarding the death of Freddy Deangelo on January 16th, 2025. Freddy was arrested and placed in a wrap in his hotel room. He died while in custody.

I seek a copy of all records relating to the report, investigation, findings and administrative discipline related to the death of Freddy Deangelo on January 16th, 2025. Freddy was arrested and placed in a wrap in his hotel room. He died while in custody.

These records should include all investigative reports and any full un-edited footage related to the incident, including officer body cam footage.

Please respond to this request within ten days either by providing the requested information or providing a written response setting forth the specific legal authority on which you rely in failing to disclose each requested record, or by specifying a date in the near future to respond to the request.

See Cal. Gov't Code § 6255. Pursuant to section 6253, please disclose all reasonably segregable non-exempt information from any portions of records you claim are exempt from disclosure.

Please send any documents, records and videos in electronic format to csocpra@gmail.com.

Show less

TimelineDocuments

 Request published

Anyone with access to this request

October 16, 2025, 9:36pm

 Request closed

Anyone with access to this request

Hello,

Your request has already been submitted and is being processed under request number [25-763]. A portion of the records have been released under that request. This duplicate request has been closed however you will be

notified by email when new information is added to the existing request.

Thank you for your patience.

October 16, 2025, 5:23pm by Jessica Antes , Records Manager (Staff)

 Document(s) released [Anyone with access to this request](#)

<https://cityofsantaanaca.nextrequest.com/requests/25-763>

October 16, 2025, 5:21pm by Jessica Antes , Records Manager (Staff)

 Department assignment [Anyone with access to this request](#)

Added: Police Department .

October 13, 2025, 4:13pm by Norma Orozco, Sr. Deputy City Clerk (Staff)

 Request opened [Anyone with access to this request](#)

Request received via web

October 13, 2025, 4:10pm by CSO OC PRA

[FAQS](#)
[Help](#)
[Privacy](#)
[Terms](#)

 **CIVICPLUS**
NextRequest

EXHIBIT 2

to Verified Complaint and Petition for Writ of Mandate

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Request 25-763

Open

1 of 21 with filters active

Dates

Received

March 31, 2025 via web

Requester

SAPD Records

Staff assigned

Departments

Police Department

Point of contact

Jessica Antes

Request

SB1421 Responsive files

In Custody Death that occurred at the Santa Ana Jail Facility on January 15, 2025

Related to DR# 2025-01082

TimelineDocuments

Message to requester

Anyone with access to this request

The Department has been working on releasing SB1421 responsive documents relating to the in-custody death of Mr. Freddie DeAngelo Washington in response to your Public Records Request. At this time, the initial arrest report, death report, associated body-worn camera footage, and photos have been released. The internal affairs administrative investigation is still on-going as is the independent review by the DA's Office; once these investigations are completed, the reports and supporting evidence and documentation will be released and posted on a rolling basis on the City's document repository for Police Critical Incidents. I do not have an estimated time frame for this release as portions of the investigations are being conducted by outside agencies. The Records Unit will advise you via email as soon as we have an update or additional records to produce.

July 16, 2026, 6:11pm by Jessica Antes , Records Manager (Staff)

Document(s) released

Anyone with access to this request

<https://publicdocs.santa-ana.org/WebLink/Browse.aspx?startid=549938&dbid=1>

June 26, 2026, 9:58am by Lisa Figueroa, Police Records Clerk (Staff)

Document(s) released

Anyone with access to this request

250108227_Redacted.pdf
250108889_Redacted.pdf
Initial Arrest - SAPD Arrest_Redacted.pdf

June 16, 2025, 4:07pm by Jessica Antes , Records Manager (Staff)

Document(s) released

Anyone with access to this request

MASTER_IN CUSTODY DEATH 2025_01082.mp4

June 2, 2025, 3:25pm by Jessica Antes , Records Manager (Staff)

 **Request published** [Anyone with access to this request](#)

March 31, 2025, 3:26pm by Jessica Antes , Records Manager (Staff)

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

<https://www.youtube.com/watch?v=7xROSqoS5yo&t=369s&pp=0gcjCXcA-SJGOe9V>

March 31, 2025, 2:15pm by Jessica Antes , Records Manager (Staff)

 **Department assignment** [Anyone with access to this request](#)

Police Department

March 31, 2025, 2:14pm by Jessica Antes , Records Manager (Staff)

 **Request opened** [Anyone with access to this request](#)

Request received via web

March 31, 2025, 2:14pm by Jessica Antes , Records Manager (Staff)

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 **CIVICPLUS**
NextRequest

EXHIBIT 3

to Verified Complaint and Petition for Writ of Mandate

Skip to main content

City of Santa Ana

 NextRequest



Request 25-2759 [Open](#)

1 of 21 with filters active

Dates

Received
November 05, 2025 via web

Requester

 CSO OC PRA

Staff assigned

Departments

Police Department

Point of contact

Jessica Antes

Request

Request for Public Records Regarding the in-custody death of Freddie DeAngelo Washington on January 15th, 2025.

I seek a copy of all records relating to the report, investigation, findings and administrative discipline related to the in-custody death of Freddie DeAngelo Washington on January 15th, 2025.

These records should include all investigative reports and any full un-edited footage related to the incident, including officer body cam footage of all officers involved in the incident.

We are requesting all audio and video footage related to this incident from when dispatch was requested until the officers arrived. We are requesting all audio and video footage from the hotel and as the incident escalated. We are also requesting all audio and video footage from the transportation of Freddie DeAngelo Washington as he was transported back to the police station. Any audio or video footage that follows until the in-custody death of Freddie DeAngelo Washington is also being requested.

Please respond to this request within ten days either by providing the requested information or providing a written response setting forth the specific legal authority on which you rely in failing to disclose each requested record, or by specifying a date in the near future to respond to the request.

See Cal. Gov't Code § 6255. Pursuant to section 6253, please disclose all reasonably segregable non-exempt information from any portions of records you claim are exempt from disclosure.

Please send any documents, records and videos in electronic format to csoocpra@gmail.com.

Show less

Timeline Documents

Document(s) released Anyone with access to this request

Case 2025-01014 - 06162026_REDACTED'.pdf
Case 2025-01082 - 06162026_REDACTED'.pdf

July 1, 2026, 3:08pm by Jessica Antes , Records Manager (Staff)

 **Document(s) released** Anyone with access to this request
https://publicdocs.santa-
ana.org/WebLink/1/fol/557151/Row1.aspx

July 1, 2026, 3:07pm by Jessica Antes , Records Manager (Staff)

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

December 17, 2025, 2:10pm by Lisa Figueroa, Police Records Clerk (Staff)

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

December 16, 2025, 5:35pm

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

Hello,

SAPD has created a public portal to view all non-exempt records related to your request for the purpose of eliminating duplicative requests for information. All updates will be posted to the request linked below and you will continue to be notified by email as additional records are released.

<https://cityofsantaanaca.nextrequest.com/requests/25-760>

Thank you for your patience. If you have any questions please don't hesitate to contact SAPD Records Division at 714-245-8600.

December 16, 2025, 4:15pm by Lisa Figueroa, Police Records Clerk (Staff)

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

Added: Police Department .

November 5, 2025, 4:29pm by Norma Orozco, Sr. Deputy City Clerk (Staff)

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

Request received via web

November 5, 2025, 3:44pm by CSO OC PRA

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 **CIVICPLUS**
NextRequest

EXHIBIT 4

to Verified Complaint and Petition for Writ of Mandate



THE PEACE AND JUSTICE LAW CENTER
A NONPROFIT, PUBLIC INTEREST LAW CORPORATION

600 WEST SANTA ANA BOULEVARD
CIVIC CENTER PLAZA TOWERS, SUITE #810
SANTA ANA, CA 92701

OFFICE
www.pjlawcenter.org
(657) 207-2397

DIRECT
sean.garcialeys@gmail.com
(323) 490-2412

June 15, 2026

Alvaro Nuñez
Santa Ana City Manager
20 Civic Center Plaza – M-31
Santa Ana, CA 92701

Sonia Carvalho
Santa Ana City Attorney
20 Civic Center Plaza
Santa Ana, CA 92701
scarvalho@santa-ana.org

Jennifer Hall
Santa Ana City Clerk
20 Civic Center Plaza, M-30
Santa Ana, CA 92701
cityclerk@santa-ana.org

Jessica Antes
Santa Ana Police Department Records Manager
60 Civic Center Plaza
Santa Ana, CA 92701

**Re: Demand for Immediate Compliance with the California Public Records Act - CSO OC
Requests 25-2544 and 25-2759 (Freddy DeAngelo In-Custody Death)**

To Whom it May Concern,

I represent Community Service Organization Orange County (CSO OC). This letter serves as CSO OC's formal demand that the Santa Ana Police Department (SAPD) immediately comply with the California Public Records Act (CPRA), Government Code section 7920.000 et seq. , in response to CSO OC's pending requests concerning the in-custody death of Freddy DeAngelo (also referenced in SAPD communications as Freddie DeAngelo Washington) in January 2025.

SAPD's prolonged non-production, repeated delay notices, and erroneous closure/misdirection of CSO OC's requests constitute an unlawful failure to make records available in a reasonable time and a failure to provide legally sufficient responses under the CPRA. If SAPD does not promptly cure these violations, CSO OC is prepared to file a petition in Orange County Superior Court seeking an order compelling disclosure and recovery of attorneys' fees and costs.

I. Background and Timeline

- A. On October 13, 2025, CSO OC submitted CPRA Request No. 25-2544 to the City of Santa Ana seeking records regarding the death of Freddy DeAngelo on January 16, 2025, including:
 - 1. All records relating to the report, investigation, findings, and administrative discipline related to the death.
 - 2. All investigative reports.
 - 3. All full, unedited footage related to the incident, including officer body-worn camera footage.
 - 4. Production in electronic format to csocpra@gmail.com.
- B. The City of Santa Ana responded by stating the request was duplicative and would be processed under Request No. 25-763, indicating a portion of records had been released and that CSO OC would be notified when new information was added.
- C. The records previously released by SAPD under Request No. 25-763 consisted of a small batch of materials voluntarily released by SAPD Records, including edited video footage with SAPD narrative and three redacted documents totaling 13 pages. These materials were not close to the full file of responsive records.
- D. On November 5, 2025, CSO OC submitted a second request, CPRA Request No. 25-2759, seeking records regarding the in-custody death of Freddie DeAngelo Washington on January 16, 2025, including:
 - 1. All records relating to the report, investigation, findings, and administrative discipline.
 - 2. All full, unedited audio and video footage, including body-worn camera footage of all officers involved.
 - 3. All audio/video from dispatch request through officer arrival, hotel footage as the incident escalated, transport footage back to the station, and any subsequent audio/video through the in-custody death.
- E. The City of Santa Ana responded by directing CSO OC to a portal link for Request No. 25-760 and stated the portal was created to eliminate duplicative requests.
- F. Request No. 25-760 involved an entirely different matter, not involving the death of Freddy DeAngelo, and was not duplicative of CSO OC's request. The City of Santa Ana's response appears to have been a reckless or negligent error that resulted in the city closing CSO OC's request without producing relevant records.
- G. CSO OC notified the city of the mistake. On December 17, 2025, the city reopened the request.

- H. For approximately the last six months, the City of Santa Ana has emailed periodic notices (about once every three weeks) stating it needs more time or that it will produce the documents on a rolling basis.
- I. No records relevant to the death of Freddy DeAngelo have been produced by the Santa Ana Police Department since June 16, 2025, over one year ago.

II. CPRA Violations

SAPD's handling of these requests violates the CPRA in multiple respects, including but not limited to:

- A. Failure to make a timely determination and provide responsive records within the time required by the CPRA, or to provide a legally adequate written response identifying the specific legal basis for withholding particular records.
- B. Failure to produce non-exempt records promptly and within a reasonable time, including by repeatedly issuing generic "need more time" notices without producing records or providing a concrete, lawful production plan.
- C. Improperly treating CSO OC's requests as "duplicative" and closing/misdirecting them without conducting an adequate search for responsive records and without producing responsive, non-exempt records.
- D. Failure to provide reasonably segregable portions of records where SAPD contends some portion is exempt, including failure to provide unedited versions where only limited redactions may be justified.
- E. Failure to provide full, unedited audio/video and complete investigative materials responsive to the requests, despite the public interest in transparency regarding an in-custody death.

III. Demand for Immediate Cure

CSO OC demands that SAPD take the following actions immediately:

- A. Confirm in writing by June 26th that SAPD will comply with the CPRA and begin production on a rolling basis.
- B. Produce all non-exempt responsive records without further delay, including but not limited to:
 - 1. All incident reports, supplemental reports, investigative reports, and related attachments.
 - 2. All records reflecting investigative findings, conclusions, and any administrative review.
 - 3. All records reflecting administrative discipline, if any, relating to the incident.
 - 4. All audio/video recordings responsive to the requests, including full, unedited body-worn camera footage for all involved officers, dispatch audio, and any recordings covering the hotel incident, transport, and subsequent custody events through the death.
- C. If SAPD contends any record (or portion of a record) is exempt, SAPD must:

1. Identify each withheld record or withheld portion with sufficient particularity to permit evaluation of the claim.
2. Cite the specific statutory exemption(s) relied upon for each withholding.
3. Produce all reasonably segregable non-exempt portions.
4. Describe the search conducted for responsive records, including the systems searched and the custodians/units queried (e. g. , Records, Internal Affairs, Professional Standards, Homicide/Investigations, Communications/Dispatch, and any digital evidence management systems used for body-worn camera footage).
5. Preserve all potentially responsive records, including all original/unedited audio/video, metadata, audit logs, and chain-of-custody information, and confirm in writing that SAPD has implemented a litigation hold.

IV. Notice of Intended Litigation

If SAPD does not provide the written assurances and begin meaningful production by June 26th, CSO OC will proceed with litigation without further notice, including filing a CPRA enforcement action in the appropriate California superior court seeking:

- A. An order compelling SAPD to produce all non-exempt records immediately.
- B. An order requiring SAPD to justify any withholdings with specific statutory authority and adequate factual support.
- C. Recovery of CSO OC's attorneys' fees and costs as authorized by the CPRA.
- D. Any other relief the Court deems proper.

Nothing in this letter is intended to waive any rights, remedies, or claims, all of which are expressly reserved.

Please direct all communications regarding this matter to my office, not to CSO OC.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sean Garcia-Leys', followed by a long horizontal line extending to the right.

Sean Garcia-Leys,
Executive Director
Peace and Justice Law Center

EXHIBIT 5

to Verified Complaint and Petition for Writ of Mandate

MAYOR
Valerie Amezcua
MAYOR PRO TEM
David Penaloza
COUNCILMEMBERS
Phil Bacerra
Johnathan Ryan Hernandez
Jessie Lopez
Thai Viet Phan
Benjamin Vazquez



CITY MANAGER
Alvaro Nuñez
CITY ATTORNEY
Sonia R. Carvalho
CITY CLERK
Jennifer L. Hall

CITY OF SANTA ANA

CITY ATTORNEY'S OFFICE

20 Civic Center Plaza • P.O. Box 1988
Santa Ana, California 92702
www.santa-ana.org

June 26, 2026

VIA E-MAIL ONLY

sean.garcialeys@gmail.com

Mr. Sean Garcia-Leys
The Peace and Justice Law Center
600 W. Santa Ana Blvd., Suite 810
Santa Ana, CA 92701

Re: Compliance with Public Records Act Requests 25-2544 and 25-2759

Dear Mr. Garcia-Leys,

The City of Santa Ana ("City") is in receipt of your letter of June 15, 2026 regarding your request for immediate compliance with the Public Records Act (PRA) specific to your requests, identified as public records request #'s PRR 25-2544 and PRR 25-2759. The City will refer to those identifying numbers in this response and in future communications regarding those requests. The requests sought the following:

PRR 25-2544: I seek a copy of all records relating to the report, investigation, findings and administrative discipline related to the death of Freddy Deangelo on January 16th, 2025. Freddy was arrested and placed in a wrap in his hotel room. He died while in custody.

These records should include **all investigative reports and any full un-edited footage related to the incident, including officer body cam footage.**

PRR 25-2759: I seek a copy of all records relating to the report, investigation, findings and administrative discipline related to the in-custody death of Freddie DeAngelo Washington on January 15th, 2025.

These records should include **all investigative reports and any full un-edited footage related to the incident, including officer body cam footage of all officers involved in the incident.**

We are requesting **all audio and video footage related to this incident from when dispatch was requested until the officers arrived. We are requesting all audio and video footage from the hotel**

SANTA ANA CITY COUNCIL

Valerie Amezcua
Mayor
vamezcua@santa-ana.org

David Penaloza
Mayor Pro Tem - Ward 6
dpenaloza@santa-ana.org

Thai Viet Phan
Ward 1
tphan@santa-ana.org

Benjamin Vazquez
Ward 2
bvazquez@santa-ana.org

Jessie Lopez
Ward 3
jessielopez@santa-ana.org

Phil Bacerra
Ward 4
pbacerra@santa-ana.org

Johnathan Ryan Hernandez
Ward 5
jryanhernandez@santa-ana.org

and as the incident escalated. We are also requesting all audio and video footage from the transportation of Freddie DeAngelo Washington as he was transported back to the police station. Any audio or video footage that follows until the in-custody death of Freddie DeAngelo Washington is also being requested.

City noted your comments, and in specific, the directions and notations in the responses to PRR 25-2544 and 25-2759 regarding direction by City Staff to your office to review and obtain responses to your requests under separate PRR files (PRR 25-760 and 25-763). With this response, disregard any future reference to review or locate records via PRR 25-760 and/or 25-763.

In response to your June 15 letter, City will produce responsive records to this request. For clarity, and efficiency, the City will produce records via the NextRequest portal for PRR 25-2759. This request contains your original request under 25-2544 along with the additional records requested under PRR 25-2759 (emphasized above).

With this response, the City has uploaded responsive records via the NextRequest link for PRR 25-2759. City has additional records and will begin producing any non-exempt and responsive records by means of a rolling production on or about July 8, 2026. The City does not waive its right to withhold or redact information or supplement its prior responses, subject to legal exemptions under the PRA. For any records which may be redacted or withheld, the City will provide the requisite exemption language under the PRA and the name and title for the person responsible for said determination as required by Gov't. Code §§7922.540.

The City will provide an update to this response no later than July 10, 2026. Should you have any questions regarding this response or have issues accessing the records, please contact me.

Lastly, City will preserve records as in Section III.5 of your letter. While the City will make all efforts to produce records, the City is not required to create records or descriptions of how searches were conducted under Section III.C.4 of your letter.

Sincerely,

SONIA R. CARVALHO

City Attorney



Tamara Bogosian

Senior Assistant City Attorney

SANTA ANA CITY COUNCIL

Valerie Amezcua
Mayor
vamezcua@santa-ana.org

David Penaloza
Mayor Pro Tem - Ward 6
dpenaloza@santa-ana.org

Thai Viet Phan
Ward 1
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Benjamin Vazquez
Ward 2
bvazquez@santa-ana.org

Jessie Lopez
Ward 3
jessielopez@santa-ana.org

Phil Bacerra
Ward 4
pbacerra@santa-ana.org

Johnathan Ryan Hernandez
Ward 5
jryanhernandez@santa-ana.org

EXHIBIT 6

to Verified Complaint and Petition for Writ of Mandate



Sean Garcia-Leys <sean.garcialeys@gmail.com>

Fwd: PRA Requests # 25-2544 and 25-2759

1 message

Sean Garcia-Leys <sean.garcialeys@gmail.com>
To: 002f8c934+matter1874810615@maildrop.clio.com

Wed, Jul 1, 2026 at 3:18 PM

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

From: **Antes, Jessica** <jantes@santa-ana.org>

Date: Wed, Jul 1, 2026 at 3:15 PM

Subject: RE: PRA Requests # 25-2544 and 25-2759

To: Bogosian, Tamara <TBogosian@santa-ana.org>, Sean Garcia-Leys <sean.garcialeys@gmail.com>, St Clair, Suzanne <sstclair@santa-ana.org>

Cc: Figueroa, Lisa <lfigueroa@santa-ana.org>

Hello,

Please be advised that a portion of the responsive records have been posted to the Next Request case file 25-2759. Additional records have been and will continue to be updated on the City's Laserfiche document repository linked below.

<https://publicdocs.santa-ana.org/WebLink/1/foi/557151/Row1.aspx>

Sincerely,



Jessica Antes

POLICE ADMINISTRATIVE MANAGER – RECORDS & EVIDENCE

Santa Ana Police Department

COMMUNITY

60 Civic Center Plaza, P.O. Box 1981, Santa Ana, CA 92701

FIRST

JAntes@santa-ana.org | (714) 245-8620

ductus exemplo

From: Bogosian, Tamara <TBogosian@santa-ana.org>

Sent: Wednesday, July 1, 2026 1:26 PM

To: 'Sean Garcia-Leys' <sean.garcialeys@gmail.com>; St Clair, Suzanne <sstclair@santa-ana.org>

Subject: RE: PRA Requests # 25-2544 and 25-2759

Mr. Garcia-Leys,

SAPD's Records Manager confirmed some of the responsive records will be **uploaded today** in the NextRequest system under PRA #25-2759, and, per my previous correspondence attached, the City will begin producing additional non-exempt and responsive records on a rolling basis beginning a week from today (**on or about July 8, 2026**).

City staff will continue to remain in direct communication with you through the Next Request portal for this request and as records are available for production/viewing.

Than you for your understanding.

All the best,

Tamara Bogosian

Senior Assistant City Attorney

Santa Ana City Attorney's Office

60 Civic Center Plaza, M29

Santa Ana, California 92701

Phone: (714) 647-6961

Mobile: (657) 305-0078

* Email: tbogosian@santa-ana.org



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City Hall is closed every other Friday. Click on link for schedule: <https://www.santa-ana.org/holiday-and-closed-friday-schedule>

From: Sean Garcia-Leys <sean.garcialeys@gmail.com>
Sent: Wednesday, July 1, 2026 1:02 PM
To: St Clair, Suzanne <sstclair@santa-ana.org>
Cc: Bogosian, Tamara <TBogosian@santa-ana.org>
Subject: Re: PRA Requests # 25-2544 and 25-2759

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Hello Ms. Bogosian,

As I understood your June 26, 2026 letter, there should now be initial documents uploaded to PRR 25-2759. You wrote in your letter, "With this response, the City has uploaded responsive records via the NextRequest link for PRR 25-2759." However, I do not see any documents at <https://cityofsantaanaca.nextrequest.com/requests/25-2759>.

Our client has been told for nearly a year that records are forthcoming without ever receiving any records. Your statement that the city had begun producing documents was interpreted as a good faith sign that the city's responsiveness had improved. But since those records still do not appear on the NextRequest portal, my clients are now concerned that they were mistaken in giving the city the benefit of the doubt.

Do you have an explanation for why there are no responsive records on NextRequest? An explanation would be helpful in preventing litigation on this matter.

Sincerely,

Sean Garcia-Leys

On Fri, Jun 26, 2026 at 1:57 PM St Clair, Suzanne <sstclair@santa-ana.org> wrote:

Counsel –

Please see attached letter from Attorney Tamara Bogosian.

Thank you,
Suzanne

Suzanne St. Clair | Paralegal

City Attorney's Office | 20 Civic Center Plaza, 7th Floor | Santa Ana, CA 92701

Direct: 714-647-5206 | email: sstclair@santa-ana.org



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EXHIBIT 7

to Verified Complaint and Petition for Writ of Mandate



Sean Garcia-Leys <sean.garcialeys@gmail.com>

RE: PRA Requests # 25-2544 and 25-2759

Bogosian, Tamara <TBogosian@santa-ana.org>

Wed, Jul 15, 2026 at 3:35 PM

To: Sean Garcia-Leys <sean.garcialeys@gmail.com>

Cc: "St Clair, Suzanne" <sstclair@santa-ana.org>, "Antes, Jessica" <jantes@santa-ana.org>

Mr. Garcia-Leys,

Ms. Antes, who is SAPD's Records Manager will communicate with you regarding this request.

Thank you for your patience and understanding.

All the best,

Tamara Bogosian

Senior Assistant City Attorney

Santa Ana City Attorney's Office

60 Civic Center Plaza, M29

Santa Ana, California 92701

Phone: (714) 647-6961

Mobile: (657) 305-0078

* Email: tbogosian@santa-ana.org www.santa-ana.gov



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From: Sean Garcia-Leys <sean.garcialeys@gmail.com>
Sent: Wednesday, July 15, 2026 2:48 PM
To: Bogosian, Tamara <TBogosian@santa-ana.org>
Cc: St Clair, Suzanne <ssclair@santa-ana.org>
Subject: Re: PRA Requests # 25-2544 and 25-2759

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Ms. Bogosian,

Thank you for that clarification. However, my client says that the email on the 10th provided only the same documents already produced except for one new video. There is also nothing in that email about what documents are going to be produced or when. I had hoped details of the document production process would be in the letter you said would arrive by last week. Should we still expect that letter?

Sincerely,

Sean Garcia-Leys

On Tue, Jul 14, 2026 at 2:39 PM Bogosian, Tamara <TBogosian@santa-ana.org> wrote:

Mr. Garcia-Leys,

Staff advised an e-mail update was provided via the Next Request portal on July 10th at 11:04 a.m. and shows it was opened by the recipient on July 11th at 10:36 a.m.

A direct link to the responsive records is included below:

<https://publicdocs.santa-ana.org/WebLink/Browse.aspx?id=557151&dbid=1&repo=Clerk>

All the best,

Tamara Bogosian

Senior Assistant City Attorney

Santa Ana City Attorney's Office

[60 Civic Center Plaza, M29](#)

[Santa Ana, California 92701](#)

Phone: (714) 647-6961

Mobile: (657) 305-0078

* Email: tbogosian@santa-ana.org



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From: Sean Garcia-Leys <sean.garcialeys@gmail.com>
Sent: Monday, July 13, 2026 3:04 PM
To: Bogosian, Tamara <TBogosian@santa-ana.org>
Cc: St Clair, Suzanne <sstclair@santa-ana.org>
Subject: Re: PRA Requests # 25-2544 and 25-2759

Attention: This email originated from outside of City of Santa Ana. Use caution when opening attachments or links.

Hello Ms. Bogosian,

Your letter from June 26th stated "The City will produce an update to this response no later than July 10, 2026" I have not yet received an update.

While we appreciate the initial production of records, avoiding litigation will require more than an ambiguous statement that documents will be produced on a rolling basis, especially since the second round of production, promised for around last Wednesday, was never made.

Sincerely,

Sean Garcia-Leys

On Thu, Jul 2, 2026 at 10:29 AM Sean Garcia-Leys <sean.garcialeys@gmail.com> wrote:

Hello Ms. Bogosian,

We were able to download the first batch of documents today. Thank you for ensuring that happened. We look forward to your letter and a final resolution to this request.

Sincerely,

Sean Garcia-Leys

On Wed, Jul 1, 2026 at 2:45 PM Sean Garcia-Leys <sean.garcialeys@gmail.com> wrote:

Thank you for the prompt response.

-sean

On Wed, Jul 1, 2026 at 1:26 PM Bogosian, Tamara <TBogosian@santa-ana.org> wrote:

Mr. Garcia-Leys,

SAPD's Records Manager confirmed some of the responsive records will be **uploaded today** in the NextRequest system under PRA #25-2759, and, per my previous correspondence attached, the City will begin producing additional non-exempt and responsive records on a rolling basis beginning a week from today (**on or about July 8, 2026**).

City staff will continue to remain in direct communication with you through the Next Request portal for this request and as records are available for production/viewing.

Than you for your understanding.

All the best,

Tamara Bogosian

Senior Assistant City Attorney

Santa Ana City Attorney's Office

[60 Civic Center Plaza, M29](#)

[Santa Ana, California 92701](#)

Phone: [\(714\) 647-6961](tel:(714)647-6961)

Mobile: [\(657\) 305-0078](tel:(657)305-0078)

* Email: tbogosian@santa-ana.org



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From: Sean Garcia-Leys <sean.garcialeys@gmail.com>
Sent: Wednesday, July 1, 2026 1:02 PM
To: St Clair, Suzanne <sstclair@santa-ana.org>
Cc: Bogosian, Tamara <TBogosian@santa-ana.org>
Subject: Re: PRA Requests # 25-2544 and 25-2759

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Hello Ms. Bogosian,

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Our client has been told for nearly a year that records are forthcoming without ever receiving any records. Your statement that the city had begun producing documents was interpreted as a good faith sign that the city's responsiveness had improved. But since those records still do not appear on the NextRequest portal, my clients are now concerned that they were mistaken in giving the city the benefit of the doubt.

Do you have an explanation for why there are no responsive records on NextRequest? An explanation would be helpful in preventing litigation on this matter.

Sincerely,

Sean Garcia-Leys

On Fri, Jun 26, 2026 at 1:57 PM St Clair, Suzanne <sstclair@santa-ana.org> wrote:

Counsel –

Please see attached letter from Attorney Tamara Bogosian.

Thank you,

Suzanne

Suzanne St. Clair | Paralegal

City Attorney's Office | 20 Civic Center Plaza, 7th Floor | Santa Ana, CA
92701

Direct: 714-647-5206 | email: sstclair@santa-ana.org



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EXHIBIT 8

to Verified Complaint and Petition for Writ of Mandate

PRR 25-2759

Antes, Jessica <jantes@santa-ana.org>

Thu, Jul 16, 2026 at 6:09 PM

To: "csoocpra@gmail.com" <csoocpra@gmail.com>, "sean.garcialeys@gmail.com" <sean.garcialeys@gmail.com>

Hello Sean and CSO OC PRA,

The Department has been working on releasing SB1421 responsive documents relating to the in-custody death of Mr. Freddie DeAngelo Washington in response to your Public Records Request. At this time, the initial arrest report, death report, associated body-worn camera footage, and photos have been released. The internal affairs administrative investigation is still on-going as is the independent review by the DA's Office; once these investigations are completed, the reports and supporting evidence and documentation will be released and posted on a rolling basis on the City's document repository for Police Critical Incidents. I do not have an estimated time frame for this release as portions of the investigations are being conducted by outside agencies. The Records Unit will advise you via email as soon as we have an update or additional records to produce.

Thanks,



**COMMUNITY
FIRST**

Jessica Antes

POLICE ADMINISTRATIVE MANAGER – RECORDS & EVIDENCE

Santa Ana Police Department

60 Civic Center Plaza, P.O. Box 1981, Santa Ana, CA 92701

JAntes@santa-ana.org | www.santa-ana.gov/pdrecords

(714) 245-8620

ductus exemplo