

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: James Chalfant

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11 Attorneys for Petitioner  
12 STOP LAPD SPYING COALITION

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
14 **COUNTY OF LOS ANGELES**

15 STOP LAPD SPYING COALITION,

16 Petitioner,

17 v.

18 THE CITY OF LOS ANGELES and LOS  
19 ANGELES CITY COUNCILMEMBER PAUL  
20 KORETZ, COUNCIL DISTRICT 5, in his  
21 official capacity.

22 Respondents.

Case No. **22STCP01580**

**VERIFIED PETITION FOR WRIT OF  
MANDATE, OR IN THE ALTERNATIVE,  
COMPLAINT FOR DECLARATORY  
AND INJUNCTIVE RELIEF**

[Exhibit A]

23 1. This case concerns the Office of Los Angeles City Councilmember Paul Koretz, Council  
24 District 5, refusing to respond to a public records request from the Stop LAPD Spying Coalition regarding  
25 the office's communications with the Simon Wiesenthal Center, a nonprofit political association that  
26 collaborates with government surveillance agencies.

27 VERIFIED PETITION FOR WRIT OF MANDATE, OR IN THE ALTERNATIVE, COMPLAINT FOR DECLARATORY  
AND INJUNCTIVE RELIEF



**JURISDICTION AND VENUE**

1  
2           6.     This court has jurisdiction under Government Code sections 6258 and 6259, Code of Civil  
3 Procedure sections 1060 and 1085, and Article VI, section 10, of the California Constitution.

4           7.     Venue is proper in this Court because at least some portion of the records at issue are  
5 situated in the County of Los Angeles and Respondents are located in the County of Los Angeles as well.

**THE STATUTORY AND CONSTITUTIONAL RIGHT TO PUBLIC RECORDS**

6  
7           8.     The California Constitution provides an independent right of access to government records:  
8 “The people have the right of access to information concerning the conduct of the people’s business, and,  
9 therefore, the meetings of public bodies and the writings of public officials and agencies shall be open to  
10 public scrutiny.” Cal. Const. Art. I § 3(b)(1).

11  
12           9.     The PRA implements the fundamental right of public access by empowering the public to  
13 inspect and copy agency records, and by codifying specific requirements and deadlines that agencies must  
14 observe upon receipt of a public records request. See Gov. Code. §6250 et seq.

15           10.    After an agency receives a PRA request, it has ten days to respond. Gov. Code § 6253(c).  
16 Within those ten days, the agency must determine whether the request seeks disclosable public records  
17 within its possession, notify the requestor of its determination and reasoning, and provide the requestor  
18 with an estimate of when the disclosable records will be made available. Id. In “unusual circumstances,”  
19 an agency can extend the time for its response by up to fourteen days, but it must notify the requestor in  
20 writing and estimate when the records will be made available. Id. Even when an agency obtains an  
21 extension, it cannot “delay or obstruct the inspection or copying of public records.” Gov. Code § 6253(d).  
22

23           11.    The PRA requires an agency to conduct a search that is “reasonably calculated to locate  
24 responsive documents.” American Civil Liberties Union of Northern California v. Superior Court, 202  
25 Cal.App.4th 55, 85 (2011). Agencies are also required to assist the requestor in formulating a request  
26 based on the agency’s greater knowledge of its own records and record-keeping practices. Gov. Code  
27

1 § 6253.1(a)(1)-(3).

2 12. An agency ultimately must respond to any request for records by “promptly” providing  
3 copies of any responsive and nonexempt documents, or by making the originals available for inspection.  
4 Gov. Code § 6253(b). If an agency decides to deny a request for records in whole or in part, it must issue  
5 a denial in writing. Id.

6 **PETITIONER’S PUBLIC RECORDS REQUEST**

7  
8 13. On February 5, 2021, Petitioner submitted to the Office of Councilmember Koretz a request  
9 for records (a) mentioning, communicating with, created with/by, or provided with/by either the Simon  
10 Wiesenthal Center, the Museum of Tolerance, or any employee of the Simon Wiesenthal Center or  
11 Museum of Tolerance; or (b) sent by, to, copying, or mentioning six individually identified Simon  
12 Wiesenthal Center leadership staff. Petitioner submitted the request through the city’s NextRequest  
13 online portal, which marked the request as # 21-929. A true and correct copy of the request is attached  
14 hereto as **Exhibit A**, along with all subsequent communications between Petitioner and Respondents  
15 regarding this request, as described below.

16 14. On February 6, 2021, the Office of Councilmember Koretz sent Petitioner a  
17 communication within NextRequest acknowledging receipt of petitioner’s February 5, 2021, request.

18 15. On February 10, 2021, the Office of Councilmember Koretz sent Petitioner a  
19 communication within NextRequest asking for start and end dates for the request. On February 11, 2021,  
20 Petitioner replied that it was seeking records from 2009 to the fulfillment date of the request.

21 16. On February 18, 2021, after the expiration of the 10-day response period, the Office of  
22 Councilmember Koretz sent Petitioner a communication within NextRequest stating it expected to  
23 respond again by March 2, 2021.

24 17. On March 2, 2021, Petitioner did not receive any records nor an update or any other  
25 response from Respondents. Nor did Petitioner receive any records or update from Respondents over the  
26

1 next several months.

2 18. On September 15, 2021, Petitioner sent Councilmember Koretz a communication within  
3 NextRequest asking for an update on the status of the request and noting that seven months had passed  
4 without any communication from him or his office. Petitioner’s communication stated:

5 Please provide an update on this request. We filed the request on February  
6 5, 2021. On February 18, you responded that you needed additional time to  
7 make a determination on the request and anticipated “being able to make  
8 this determination by March 2, 2021.”

9 We have not heard anything from you since that date, approximately seven  
10 months ago. We understand this to be a violation of the PRA’s requirements  
11 and will be considering our legal options. Please let us know whether your  
12 office will be complying with this request.

13 19. On April 20, 2022, Petitioner again sent Councilmember Koretz a communication within  
14 NextRequest asking for an update on the request. Petitioner’s communication observed that the request  
15 had been filed “in February 2021, over 14 months ago.”

16 20. Petitioner has received no response to its September 15 and April 20, 2022,  
17 communications. The last time the Office of Councilmember Koretz responded to Petitioner’s  
18 communications about this request was February 18, 2021, over 14 months ago.

19 21. Petitioner has received no records from Respondents in response to its request.

20 **PUBLIC INTEREST IN THE RECORDS**

21 1. Petitioner’s request seeks records of communications between Office of Councilmember  
22 Koretz and the Simon Wiesenthal Center, a private nonprofit association based in Los Angeles. Public  
23 interest in these records is significant.

24 2. The Simon Wiesenthal Center has thrust itself into significant political controversy in  
25 recent years. For example, on May 31, 2020, the Simon Wiesenthal Center published an announcement  
26 comparing protestors gathering on the streets in response to the police killing of George Floyd to  
27 “domestic terrorists seeking to violently to destroy American society” and applauded the Trump

1 administration's move to label groups associated with the protests as terrorist organizations.<sup>1</sup> Not long  
2 after, on July 8, 2020, the Simon Wiesenthal Center announced that Los Angeles Mayor Eric Garcetti  
3 had met with the group's leadership and vowed that no city funding would support "the Black Lives  
4 Matter organization," which the announcement referred to as an "anti-Semitic group."<sup>2</sup> The same  
5 announcement also referenced "a May 30th riot that impacted significantly on the Jewish community,"  
6 potentially a characterization of the protests provoked by the police killing of George Floyd.<sup>3</sup>

7  
8 3. Also of significant public interest is the Simon Wiesenthal Center's work with police and  
9 surveillance agencies, at least some of which has been publicly facilitated by Councilmember Koretz.  
10 During the Trump administration, the Simon Wiesenthal Center was awarded grant funding from the U.S.  
11 Department of Homeland Security to help develop a surveillance program with three divisions of the Los  
12 Angeles School Police Department that cover 14 public high schools.<sup>4</sup> The announcement of this grant  
13 came "months after the federal government's failed attempt to establish a similar surveillance program  
14 in Los Angeles," which was halted in August 2018 when "the Los Angeles Mayor's Office rejected  
15 \$500,000 in federal funding" for the program.<sup>5</sup> Up until that point, "Los Angeles had been one of three  
16 cities across the nation targeted as pilots for the program."<sup>6</sup> The very same month that the Mayor's Office  
17 rejected that funding, Councilmember Koretz wrote an official letter recommending the Simon  
18

19  
20 <sup>1</sup> Simon Wiesenthal Center (@simonwiesenthal), Twitter (May 31, 2020, 11:23 AM),  
<https://twitter.com/simonwiesenthal/status/1267159665164513281>.

21 <sup>2</sup> Simon Wiesenthal Center, "Los Angeles Mayor Garcetti to Jewish Leaders: No City Funds to BLM or  
22 any Anti-Semitic Groups" (July 8, 2020), <https://www.wiesenthal.com/about/news/los-angeles-mayor-garcetti-to.html>.

23 <sup>3</sup> Id.

24 <sup>4</sup> See Simon Wiesenthal Center, "PVE Non-Profit Pilot Grant Program" Application (August 3, 2018),  
available at <https://archive.advancingjustice-la.org/sites/default/files/Cal-PVE-Los-Angeles-Simon-Wiesenthal-Center-Application.pdf>.

25 <sup>5</sup> Massoud Hayoun, "California Rights Groups are Demanding Answers About a New, DHS-Backed  
26 Surveillance Program," Pacific Standard Magazine (November 16, 2018), <https://psmag.com/social-justice/california-rights-groups-are-demanding-answers-about-a-new-dhs-backed-surveillance-program>.

27 <sup>6</sup> Id.

1 Wiesenthal Center for the U.S. Department of Homeland Security grant “to expand this pilot program.”<sup>7</sup>

2 4. Later during the Trump administration, in October 2020, the Simon Wiesenthal Center  
3 received another U.S. Department of Homeland Security grant to “expand an existing program” that the  
4 grant announcement described as “museum experiences, meetings with ‘credible messengers,’ and goal-  
5 setting and facilitation and coaching with reintegration professionals” for individuals with “risk factors”  
6 for predicted wrongdoing.<sup>8</sup> Several dozen “human rights, civil liberties and community organizations”  
7 have warned that programs funded through this grant “discriminatorily target Muslim communities and  
8 fail to safeguard the constitutional rights and the privacy of participants.”<sup>9</sup>

10 5. In September 2021, Councilmember Koretz attended a public event at the Simon  
11 Wiesenthal Center where he awarded “commendations from the City of Los Angeles” to the Simon  
12 Wiesenthal Center’s leadership staff as well as to a number of LAPD deputy chiefs and commanders.<sup>10</sup>

13 6. According to public data accessible from the Los Angeles City Controller, the Simon  
14 Wiesenthal Center has received City funding during Councilmember Koretz’s term in office.  
15 Councilmember Koretz is currently running for Los Angeles City Controller, an office tasked with  
16 managing city spending and government transparency. His campaign website states that  
17 “Councilmember Koretz has always delivered on his commitment to governmental efficiency,  
18 transparency, accountability, and accessibility.”<sup>11</sup>

19  
20 <sup>7</sup> Letter from Paul Koretz, Los Angeles City Councilmember, to Ms. Liebe Geft, Director, Museum of  
21 Tolerance (August 1, 2018), available at [https://archive.advancingjustice-la.org/sites/default/files/Cal-  
PVE-Los-Angeles-Simon-Wiesenthal-Center-Application.pdf](https://archive.advancingjustice-la.org/sites/default/files/Cal-PVE-Los-Angeles-Simon-Wiesenthal-Center-Application.pdf).

22 <sup>8</sup> U.S. Department of Homeland Security, Targeted Violence and Terrorism Prevention Grant Program,  
“FY2020 TVTP Grant Program,” <https://www.dhs.gov/tvtpgrants> (last accessed April 28, 2022).

23 <sup>9</sup> Letter from Muslim Advocates, et al., to Chad F. Wolf, Acting Secretary of Homeland Security, et al.,  
24 (June 1, 2020), [https://muslimadvocates.org/wp-content/uploads/2020/06/2020.06.01-Letter-to-DHS-  
Re-TVTP-grants-FINAL.pdf](https://muslimadvocates.org/wp-content/uploads/2020/06/2020.06.01-Letter-to-DHS-Re-TVTP-grants-FINAL.pdf).

25 <sup>10</sup> Jewish News Syndicate, “Los Angeles police offer security tips to Jewish leaders ahead of High  
26 Holidays” (September 5, 2021), [https://www.jns.org/los-angeles-police-offer-security-tips-to-jewish-  
leaders-ahead-of-high-holidays/](https://www.jns.org/los-angeles-police-offer-security-tips-to-jewish-leaders-ahead-of-high-holidays/)

27 <sup>11</sup> Paul Koretz for LA City Controller, “Meet Paul,” <https://koretzforla.com/meet-paul-koretz> (last  
accessed April 28, 2022).

1 7. Petitioner’s public records request seeks Councilmember Koretz’s communications with  
2 the Simon Wiesenthal Center to shed light on all of these topics of significant public interest.

3 **FIRST CAUSE OF ACTION**

4 **Mandate or Other Extraordinary Relief Compelling Respondents to Provide Access to the**  
5 **Requested Records Pursuant to the California Public Records Act, Gov. Code §§ 6250 et seq. and**  
6 **Article I § 3 of the California Constitution**

7 8. Petitioner realleges and incorporates by reference the allegations of each and every  
8 paragraph above, as though set forth fully herein.

9 9. Under Article I, section 3, of the California Constitution and Government Code section  
10 6250 et seq., Petitioner has a right to inspect the documents requested in its February 5, 2021, records  
11 request to Respondents. Respondents have a duty under both the PRA and California Constitution to  
12 provide these records promptly and without delay.

13 10. Respondents have not claimed that any of the requested records or portions thereof are  
14 exempted under the express provision of the PRA or any other authority. Respondents have simply failed  
15 to respond to the request for over 14 months, despite repeated requests from Petitioner.

16 11. Pursuant to the PRA and Article I, § 3 of the California Constitution and PRA, Respondents  
17 are required to provide the records requested by Petitioner. Respondents’ failure to do so violates PRA  
18 and the California Constitution.

19 12. Therefore, pursuant to article I, section 3(b) and article VI, section 10, of the California  
20 Constitution and California Code of Civil Procedure section 1085, a writ of mandate or other order  
21 requiring the requested records to be made available to the Petitioner should be issued forthwith.

22 **SECOND CAUSE OF ACTION**

23 **Declaratory Judgment that Respondents Are Required to Provide Access to the Requested**  
24 **Records Pursuant to the California Public Records Act, Gov. Code §§ 6250 et seq. and Article I §**  
25 **3 of the California Constitution**

26 13. Petitioner realleges and incorporates by reference the allegations of each and every  
27



1 paragraph above, as though set forth fully herein.

2 14. Under Article I, section 3, of the California Constitution and Government Code section  
3 6250 et seq., Petitioner has a right to inspect the documents requested in its February 5, 2021, public  
4 records request to Respondents.

5 15. Respondents have a duty to provide promptly and without delay the public records subject  
6 to disclosure under the PRA and the California Constitution.

7 16. Respondents have not claimed that any of the requested records or portions thereof are  
8 exempted under any provisions of the PRA or any other authority. Respondents have simply not  
9 responded to the records request for over 14 months, despite repeated reminders from Petitioner.  
10

11 17. Pursuant to Article I, section 3, of the California Constitution and PRA, Respondents are  
12 required to provide the records requested by Petitioner. Respondents' failure to do so is a violation of  
13 the PRA and California Constitution.

14 18. An actual controversy has arisen between Petitioner and Respondents as to whether  
15 Respondents must comply with Petitioner's request for records.

16 19. Therefore, pursuant to article I, section 3(b), and article VI, section 10, of the California  
17 Constitution and California Code of Civil Procedure section 1060, Petitioner is entitled to a declaration  
18 that the requested records must be made available to Petitioner.

19 **REQUEST FOR RELIEF**

20 20. Government Code section 6259, subsections (a) and (b), authorize the Court to compel  
21 Respondents to release the requested documents. Petitioner therefore respectfully requests that:

- 22
- 23 a. This Court issue a peremptory writ of mandate compelling Respondents to immediately  
24 disclose the requested public records;
  - 25 b. The Court issue an alternative writ of mandate directing and requiring Respondents to  
26 immediately disclose the requested public records or show cause why Respondents should  
27

1 not have to; and, upon return to the alternative writ, issue a peremptory writ as set forth in  
2 paragraph (a) above;

- 3 c. The Court issue a declaration that Respondents' conduct violates the PRA in failing to  
4 timely disclose all requested public records in its possession and failing to timely respond  
5 to Petitioner's public records request;
- 6 d. In the alternative, the Court treat this Petition as a complaint for declaratory and injunctive  
7 relief declaring that Petitioner is entitled to copies of the requested public records and  
8 enjoining Respondents from refusing to disclose the records Petitioner has requested;
- 9 e. The Court issue an order awarding Petitioner its costs and reasonable attorneys' fees  
10 incurred in bringing this action; and,
- 11 f. For such other and further relief as the Court deems proper and just.
- 12

13  
14 Dated: April 28, 2022

Respectfully submitted,

15 LAW OFFICE OF SHAKEER RAHMAN  
16 LAW OFFICE OF COLLEEN FLYNN

17 By: /s/ Shakeer Rahman  
18 Shakeer Rahman  
19 Attorney for Petitioner


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1 VERIFICATION

2 I, Hamid Khan, declare:

3 I am the lead coordinator of the Stop LAPD Spying Coalition and I am authorized to make this  
4 verification on Petitioner's behalf in the above-titled action. I have read the foregoing Verified Petition  
5 and know its contents to be true of my own knowledge. I declare under penalty of perjury under the laws  
6 of the State of California that the foregoing is true and correct.

7  
8 Dated: April 28, 2022

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\_\_\_\_\_  
Hamid Khan

**EXHIBIT A**

You are now signed in

# Request #21-929

**OPEN**

As of April 28, 2022, 2:09pm

Request Visibility: Unpublished

## Details

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February 5, 2021

Re: Simon Wiesenthal Center PVE and TVTP Grants and Related Programs To Whom It May Concern:

Pursuant to the California Public Records Act (California Government Code § 6250 et seq.), I hereby request the following records:

-Any and all records mentioning, communications with, and documents created with/by, mentioning, provided by/to, or otherwise involving any and all of the following: the **Simon Wiesenthal Center or the Museum of Tolerance or any employee of Simon Wiesenthal Center or the Museum of Tolerance**, including but not limited to emails, grants, scholarships, fellowships, contracts, MOUs, reports, presentation slides, transactions, training materials, consultations, curricula, lesson plans etc.

-Any and all emails to, or mentioning, cc'ing, or bcc'ing any and all of the following individuals:

- Rick Eaton (reaton@wiesenthal.com)
- Emily Thompson (ethompson@wiesenthal.com and ethompson@museumoftolerance.com)
- Linda Blanshay (lblanshay@wiesenthal.com)
- Rabbi Abraham Cooper (acooper@wiesenthal.com)
- Rabbi Marvin Hier (mhier@wiesenthal.com)
- Rabbi Meyer H. May (rabbimay@wiesenthal.com)
- Liebe Geft (lgeft@wiesenthal.com)

For the purposes of this request, "records" includes but is not limited to any and all paper or electronic information, reports, evaluations, memoranda, correspondence, letters, emails, charts, graphs, flyers, meeting agendas and minutes, training materials, diagrams, forms, DVDs, tapes, CDs, notes and other similar materials. If the requested records are stored in electronic format, we ask that they be produced in electronic format.

For the purposes of this request, "communications" includes but is not limited to any and all letters, emails, call transcriptions, meeting notes, and any and all other forms of paper and electronic communications sent to, received from, cc'ing and bcc'ing either and any and all of the following: **Simon Wiesenthal Center or the Museum of Tolerance or any employee of Simon Wiesenthal Center or the Museum of Tolerance (domains @wiesenthal.com and @museumoftolerance.com)** . If the requested records are stored in electronic format, we ask that they be produced in electronic format.

Please provide all records electronically in original format to Stop LAPD Spying Coalition at [stoplapdspying@gmail.com](mailto:stoplapdspying@gmail.com). If this is not possible, please notify me prior to mailing the records to this address: Stop LAPD Spying Coalition 838 E 6th St, Los Angeles, CA 90021. Please contact me if you have any questions about my request. I look forward to receiving your response within 10 calendar days, as required by the statute.

Very truly yours,

Hamid Khan

Stop LAPD Spying Coalition  
[stoplapdspying@gmail.com](mailto:stoplapdspying@gmail.com)

[Read less](#)

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*Received*

**February 5, 2021** via web

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*Departments*

**Council District 05 (Paul Koretz)**

---

*Requester*

**Hamid Khan**

[hamidk@congress.org](mailto:hamidk@congress.org)

838 E. 6th St., Los Angeles, CA 90021

5622304578

Stop LAPD Spying Coalition

*Public (pending)*

(none)

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*Requester*

(none)

## Staff

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*Point of Contact*

**David Hersch**

## Timeline

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### **External Message**

Requester + Staff

We filed this request in February 2021, over 14 months ago. Please provide the records we have requested by Monday, April 25.

*April 20, 2022, 10:40pm by the requester*

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### **External Message**

Requester + Staff

Please provide an update on this request. We filed the request on February 5, 2021. On February 18, you responded that you needed additional time to make a determination on the request and anticipated "being able to make this determination by March 2, 2021."

We have not heard anything from you since that date, approximately seven months ago. We understand this to be a violation of the PRA's requirements and will be considering our legal options. Please let us know whether your office will be complying with this request.

*September 15, 2021, 11:40am by the requester*

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### **Due Date Changed**

Public

03/02/2021 (was 02/16/2021). Need more time to collect staff responses

*February 18, 2021, 4:12pm*

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**External Message**

Requester + Staff

Dear Mr. Khan:

The Office of Council District 5 (CD5) for the City of Los Angeles is in receipt of your public records request (Request #21-929).

Pursuant to Government Code Section 6253(c), please be advised that due to the time required to search for and collect the requested records from other facilities outside of our Office, we will be unable to determine if our office is in possession of records that are responsive to your request by the current response deadline of February 16, 2021. We anticipate being able to make this determination by March 2, 2021.

Please note, we reserve the right to withhold and/or redact any records or information that may be exempt from disclosure under the Public Records Act, and/or other applicable legal privileges including, but not limited to, attorney work product, attorney-client privilege, and the deliberative process exception.

Kindest regards,

**DAVID HERSCH**

Deputy Chief of Staff  
Council District 5

*February 18, 2021, 4:08pm by David Hersch, Deputy Chief of Staff (Staff)*

**External Message**

Requester + Staff

Hello, the time period for our request covers the period since councilmember Koretz started in 2009 until the date of fulfillment of the request. Thank you

*February 11, 2021, 10:23am by the requester*

**External Message**

Requester + Staff

Hi Mr. Kahn,

Please let me know if there is a start date and an end date for this request?

Thank you!

David Hersch  
Deputy Chief of Staff  
Council District 5

*February 10, 2021, 9:02am by David Hersch, Deputy Chief of Staff (Staff)*



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**External Message**

Requester + Staff

Dear Mr. Kahn:

This message is in response to your February 5, 2021, CPRA request (Request #21-929) to Council District 5 relative to the Simon Wiesenthal Center pursuant to the California Public Records Act (CPRA).

Please be advised that we are working diligently to conduct a thorough search of our files for documents responsive to your request. We expect to make a determination as to whether responsive documents are available concerning the request on or before February 16, 2021.

If you have any questions, you may follow up with me by e-mail or at 213-473-7005. We greatly appreciate your courtesy and cooperation in this matter.

Kindest regards,

**DAVID HERSCH**

Deputy Chief of Staff  
Council District 5

*February 6, 2021, 8:14am by David Hersch, Deputy Chief of Staff (Staff)*

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**Department Assignment**

Public

Council District 05 (Paul Koretz)

*February 5, 2021, 5:40pm*

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**Request Opened**

Public

Request received via web

*February 5, 2021, 5:40pm*

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