

Item No. 9

Committee: Complaint Committee Date: 10/21/2025

OTHER

*\* An asterisked item indicates a document that exceeds 25 pages. The complete document is in the file and available on a disk.*

Item 9 - Page 1 of 192

# Initial Request

**From:** [Great Deeds](#)  
**To:** [SOTF \(BOS\)](#)  
**Cc:** [Somera, Alisa \(BOS\)](#)  
**Subject:** Fwd: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)  
**Date:** Tuesday, September 30, 2025 2:05:49 PM

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This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Jared Stratton

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

From: **SANFRANCISCOPD Support** <[sanfranciscopd@govqa.us](mailto:sanfranciscopd@govqa.us)>  
Date: Tue, Sep 30, 2025, 12:29 PM  
Subject: Public Records Request :: P225497-092825  
To: [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com) <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

--- Please respond above this line ---



September 30, 2025

Via email [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

Jared Stratton  
[5575 Greenridge Road](#)  
[Castro Valley, CA 94552](#)

RE: Public Records Request, dated September 28, 2025, Reference # P225497-092825

Dear Jared Stratton:

The San Francisco Police Department (SFPD) received your Public Records Act request, dated September 28, 2025, on September 30, 2025.

You requested, "*Dear Lieutenant Heppler,*

*This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete*

*investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975.*

*Our request is grounded in the California Constitution, which establishes that access to government information is a “fundamental and necessary right of every person in this state” (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. Your department’s blanket denial, based on a single statutory citation, fails to meet the legal burden of providing a specific, factual justification for withholding records of immense public importance.*

*While we acknowledge the investigatory files exemption under § 7923.600 and the precedent set by Williams v. Superior Court (1993) 5 Cal.4th 337, a mechanical application of this exemption to a nearly 50-year-old case is unreasonable and contrary to the public interest. The original justifications for this exemption—to protect witness safety, prevent the destruction of evidence, and shield investigative techniques—have been eroded to the point of nonexistence by the passage of five decades. To claim that this file remains exempt simply by labeling the case as perpetually “open” creates a legal fiction that would shield the SFPD from all public accountability for its handling of one of San Francisco’s most notorious unsolved serial murder cases.*

*Even if the file technically falls within the exemption, the CPRA’s public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy.*

*Urgent Public Safety Interest: The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a “strong person of interest” and, most critically, is believed to be “alive and living in the Bay Area”. This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution.*

*Government Accountability: The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-generational failure of the justice system. The public has a right to scrutinize the SFPD’s original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department’s contemporary handling of the case and understand the specific evidentiary or procedural hurdles that prevent an arrest today.*

*Waiver of Secrecy by Public Solicitation: The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to solicit assistance in this very case. This includes:*

*Holding multiple press conferences to release details of the investigation.*

*Publishing a 1975 forensic sketch of the suspect alongside a modern, age-progressed rendering.*

*Releasing audio from a 1974 911 call related to the discovery of a victim’s body.*



*Increasing a public reward for information to \$250,000.*

*It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case.*

*Finally, your blanket denial violates the CPRA's mandatory duty to segregate and redact. Cal. Govt. Code § 7922.525(b) requires that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law." A wholesale refusal to release any part of the file is a clear violation of this statute.*

*Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. In the alternative, should you maintain that specific portions of the file are lawfully exempt, we demand that you produce the entire file with only those specific portions redacted, accompanied by a detailed index justifying each redaction under law.*

*Please be advised that if you fail to provide the requested records within the statutory timeframe, we will consider this a final denial. We will then pursue all available legal remedies, including filing a petition with the San Francisco Supervisor of Records under the San Francisco Sunshine Ordinance (S.F. Administrative Code § 67.21(d)) and initiating litigation to compel disclosure under the CPRA.*

*We expect a prompt and substantive response.*

*Sincerely,*

*Jared Stratton"*

Generally, SFPD declines to release records to an open investigation under California Government Code Section 7923.600, which exempts from disclosure records of complaints to, investigations conducted by, intelligence information or security procedures of, and investigatory or security files compiled by local police agencies. As such, we are unable to provide you with the information you seek, as disclosure of information may endanger successful completion of the investigation.

Thank you for your attention.  
Sincerely,

Lieutenant William Heppler #1726  
Officer In Charge  
Risk Management - Legal Division

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To monitor the progress or update this request please log into the [SFPD Public Records Center](#).

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**This is an auto-generated email and has originated from an unmonitored email account. Please DO NOT REPLY.**

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# Initial Response

October 1, 2025

Via email [sotf@sfgov.org](mailto:sotf@sfgov.org)

Sunshine Ordinance Task Force

1 Dr. Carlton B. Goodlett Place, City Hall, Room 244

San Francisco, CA 94102

Re: Complaint No. 25075 - filed by Jared Stratton against the Police Department

Dear Sunshine Ordinance Task Force:

The San Francisco Police Department (SFPD) acknowledges receipt of the Complaint filed by Jared Stratton with the Sunshine Ordinance Task Force (SOTF), alleging a violation of Administrative Code (Sunshine Ordinance) Section 67.21, specifically the Department's alleged failure to respond to a public records request in a timely and/or complete manner.

On **09/12/2025** the SFPD a public records request (Reference # P223477-091225) from the Complainant via an Artificial Intelligence application "Gemini 2.5 PRO", as follows:

Request: *"Gemini 2.5 Pro PRO Conversation with Gemini Gemini write me a records request for the following link using its criteria. We want all records related to the serial killer the Doodler in San Francisco California. Use deep research on all articles and if you can use a logical answer on the subject besides his nickname Show thinking In response to your request, I have drafted a detailed public records request for information regarding the "Doodler" serial killer. Below you will find the text for the request, information on where to submit it, and a summary of the case based on my research. Records Request Regarding the "Doodler" Serial Killer To: Custodian of Records San Francisco Police Department Subject: Public Records Act Request for Records Pertaining to the "Doodler" Serial Killer Investigation Dear Custodian of Records, Pursuant to the California Public Records Act (Government Code § 6250 et seq.) and San Francisco's Sunshine Ordinance, I am requesting access to and copies of all public records related to the investigation of the serial killer known as the "Doodler," who is believed to be responsible for a series of murders and assaults in San Francisco between January 1974 and September 1975. To assist in your search, the perpetrator was also known by the moniker "the Black Doodler," and the crimes primarily targeted gay white men in the city. The suspect was described as a Black male, approximately 19-25 years old at the time of the crimes, who would often sketch his victims before the attacks. I am requesting the following records: All initial and follow-up police reports related to the confirmed victims of the Doodler, including but not limited to: Gerald Earl Cavanagh, Joseph "Jae" Stevens, Klaus Achim Christmann, Frederick Capin, Harald Gullberg, and Warren Andrews. All investigative notes, memos, and correspondence related to the Doodler case. All forensic and crime scene reports, including autopsy reports, ballistics, and any DNA evidence that has been collected and analyzed. All witness statements and interview transcripts with survivors, witnesses, and any persons of interest, including the "strong suspect" who was interviewed in January 1976. All composite sketches and age-progression images of the suspect*

*that have been created and released to the public. Any and all records related to the reward offered for information leading to the identification, apprehension, and conviction of the suspect. Any and all press releases and public communications issued by the San Francisco Police Department regarding the Doodler case. Any documents that discuss potential connections to other unsolved murders in the Bay Area or other jurisdictions. If any portion of this request is denied, please provide a written explanation for the denial, citing the specific statutory exemption(s) that justify the withholding of the records. The California Public Records Act requires a response within 10 days. I look forward to your prompt response. Thank you for your time and assistance. Sincerely, [Your Name] [Your Contact Information]"*

On **09/12/2025** the SFPD responded to the request (reference # P223477-091225), informing The Complainant that their request was denied due to the Open case/open investigation exemption per CA Government Code 7923.600.

*SFPD Response: This case remains an open investigation and disclosure of the requested information at this time may endanger successful completion of that investigation and/or adjudication. The San Francisco Police Department (SFPD) declines to release records under **Cal. Govt. Code § 7923.600**, which exempts from disclosure records of complaints to, investigations conducted by, intelligence information or security procedures of, and investigatory or security files compiled by local police agencies.  
Sincerely,*

*Lieutenant William Heppler #1726  
Officer In Charge - Legal Division  
1245-3rd St 4th Floor  
San Francisco, Ca 94158*

On **09/28/2025** the SFPD received a public records request (Reference # P225497-09825) from the Complainant, as follows:

*Request: "Dear Lieutenant Heppler, This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975. Our request is grounded in the California Constitution, which establishes that access to government information is a "fundamental and necessary right of every person in this state" (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. Your department's blanket denial, based on a single statutory citation, fails to meet the legal burden of providing a specific, factual justification for withholding records of immense public importance. While we acknowledge the investigatory files exemption under § 7923.600 and the precedent set by Williams v. Superior Court (1993) 5 Cal.4th 337, a mechanical application of this exemption to a nearly 50-year-old case is unreasonable and contrary to the public interest. The original justifications for this exemption—to protect witness safety, prevent*

*the destruction of evidence, and shield investigative techniques—have been eroded to the point of nonexistence by the passage of five decades. To claim that this file remains exempt simply by labeling the case as perpetually "open" creates a legal fiction that would shield the SFPD from all public accountability for its handling of one of San Francisco's most notorious unsolved serial murder cases. Even if the file technically falls within the exemption, the CPRA's public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy. Urgent Public Safety Interest: The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a "strong person of interest" and, most critically, is believed to be "alive and living in the Bay Area". This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution. Government Accountability: The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-generational failure of the justice system. The public has a right to scrutinize the SFPD's original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department's contemporary handling of the case and understand the specific evidentiary or procedural hurdles that prevent an arrest today. Waiver of Secrecy by Public Solicitation: The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to solicit assistance in this very case. This includes: Holding multiple press conferences to release details of the investigation. Publishing a 1975 forensic sketch of the suspect alongside a modern, age-progressed rendering. Releasing audio from a 1974 911 call related to the discovery of a victim's body. Increasing a public reward for information to \$250, 000. It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case. Finally, your blanket denial violates the CPRA's mandatory duty to segregate and redact. Cal. Govt. Code § 7922.525(b) requires that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law." A wholesale refusal to release any part of the file is a clear violation of this statute. Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. In the alternative, should you maintain that specific portions of the file are lawfully exempt, we demand that you produce the entire file with only those specific portions redacted, accompanied by a detailed index justifying each redaction under law. Please be advised that if you fail to provide the requested records within the statutory timeframe, we will consider this a final denial. We will then pursue all available legal remedies, including filing a petition with the San Francisco Supervisor of Records under the San Francisco Sunshine Ordinance (S.F. Administrative Code § 67.21(d)) and initiating litigation to compel disclosure under the CPRA. We expect a prompt and substantive response. Sincerely, Jared Stratton"*

On **09/30/2025** the SFPD responded to the request through the GovQA Portal (Reference # P225497-092825), informing The Complainant that their request was denied due to the Open case/open investigation exemption per CA Government Code 7923.600.

*SFPD Response: "Generally, SFPD declines to release records to an open investigation under California Government Code Section 7923.600, which exempts from disclosure records of complaints to, investigations conducted by intelligence information or security procedures of, and investigatory or security files compiled by local police agencies. As such, we are unable to provide you with the information you seek, as disclosure of information may endanger successful completion of the investigation."*

*Thank you for your attention.  
Sincerely,*

*Lieutenant William Heppler #1726  
Officer In Charge  
Risk Management - Legal Division*

**SFPD** submits the following supporting documents to the Sunshine Ordinance Task Force for your consideration:

- 1) SFPD response letter, dated September 12, 2025, Reference # P223477-091225
- 2) SFPD Public Records Request/GovQA activity sheet, Reference # P223477-091225
- 3) SFPD Public Records Request/GovQA activity sheet, Reference # P225497-092825

## **Conclusion**

Based on the information and documented correspondence detailed above, the SFPD **denies** the allegation that it violated Section 67.21 of the Administrative Code (Sunshine Ordinance). The SFPD acted in accordance with applicable California Government Code provisions in withholding records related to an open investigation. (Per California Government Code Section(s) **Cal. Govt. Code § 7923.600**) Therefore, the denial of the records request was lawful and appropriate under the circumstances.

Thank you for your courtesy in this regard.

If you have any questions, please contact the Legal Division at (415) 837-7394.

Sincerely,

Lieutenant William Heppler # 1726  
Risk Management - Legal Division



**LONDON N. BREED**  
MAYOR

September 12, 2025

CITY AND COUNTY OF SAN FRANCISCO  
**POLICE DEPARTMENT**  
HEADQUARTERS  
1245 3<sup>RD</sup> Street  
San Francisco, California 94158



**WILLIAM SCOTT**  
CHIEF OF POLICE

*Via email J.stratton25@gmail.com*

Jared Stratton  
5575 Greenridge Road  
Castro Valley, CA 94552

RE: Public Records Request, dated September 12, 2025, Reference # P223477-091225

Dear Jared Stratton:

The San Francisco Police Department (SFPD) received your Public Records Act request, dated September 12, 2025.

*You requested, "Gemini 2.5 Pro PRO Conversation with Gemini Gemini write me a records request for the following link using its criteria. We want all records related to the serial killer the Doodler in San Francisco California. Use deep research on all articles and if you can use a logical answer on the subject besides his nickname Show thinking In response to your request, I have drafted a detailed public records request for information regarding the "Doodler" serial killer. Below you will find the text for the request, information on where to submit it, and a summary of the case based on my research. Records Request Regarding the "Doodler" Serial Killer To: Custodian of Records San Francisco Police Department Subject: Public Records Act Request for Records Pertaining to the "Doodler" Serial Killer Investigation Dear Custodian of Records, Pursuant to the California Public Records Act (Government Code § 6250 et seq.) and San Francisco's Sunshine Ordinance, I am requesting access to and copies of all public records related to the investigation of the serial killer known as the "Doodler," who is believed to be responsible for a series of murders and assaults in San Francisco between January 1974 and September 1975. To assist in your search, the perpetrator was also known by the moniker "the Black Doodler," and the crimes primarily targeted gay white men in the city. The suspect was described as a Black male, approximately 19-25 years old at the time of the crimes, who would often sketch his victims before the attacks. I am requesting the following records: All initial and follow-up police reports related to the confirmed victims of the Doodler, including but not limited to: Gerald Earl Cavanagh, Joseph "Jae" Stevens, Klaus Achim Christmann, Frederick Capin, Harald Gullberg, and Warren Andrews. All investigative notes, memos, and correspondence related to the Doodler case. All forensic and crime scene reports, including autopsy reports, ballistics, and any DNA evidence that has been collected and analyzed. All witness statements and interview transcripts with survivors, witnesses, and any persons of interest, including the "strong suspect" who was interviewed in January 1976. All composite sketches and age-progression images of the suspect that have been created and released to the public. Any and all records related to the reward offered for information leading to the identification, apprehension, and conviction of the suspect. Any and all press releases and public communications issued by the San Francisco Police Department regarding the Doodler case.*

*Any documents that discuss potential connections to other unsolved murders in the Bay Area or other jurisdictions. If any portion of this request is denied, please provide a written explanation for the denial, citing the specific statutory exemption(s) that justify the withholding of the records. The California Public Records Act requires a response within 10 days. I look forward to your prompt response. Thank you for your time and assistance. Sincerely, [Your Name] [Your Contact Information]"*

In acknowledgement of your request, please see our responses below.

**Open Case:**

This case remains an open investigation and disclosure of the requested information at this time may endanger successful completion of that investigation and/or adjudication. The San Francisco Police Department (SFPD) declines to release records under **Cal. Govt. Code § 7923.600**, which exempts from disclosure records of complaints to, investigations conducted by, intelligence information or security procedures of, and investigatory or security files compiled by local police agencies.

Sincerely,

Lieutenant William Heppler #1726  
Officer In Charge - **Legal Division**  
1245-3rd St 4th Floor  
San Francisco, Ca 94158





# Public Records Request (#P223477-091225)

▼ **Public Records Request Details**

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Department:	Legal
Category of Records:	Public Records Request

Describe the Record(s)  
Requested:

Gemini

2.5 Pro

PRO

Conversation with Gemini

Gemini write me a records request for the following link using its criteria.

We want all records related to the serial killer the Doodler in San Francisco California. Use deep research on all articles and if you can use a logical answer on the subject besides his nickname

Show thinking

In response to your request, I have drafted a detailed public records request for information regarding the "Doodler" serial killer. Below you will find the text for the request, information on where to submit it, and a summary of the case based on my research.

Records Request Regarding the "Doodler" Serial Killer

To:

Custodian of Records

San Francisco Police Department

Subject: Public Records Act Request for Records Pertaining to the "Doodler" Serial Killer Investigation

Dear Custodian of Records,

Pursuant to the California Public Records Act (Government Code § 6250 et seq.) and San Francisco's Sunshine Ordinance, I am requesting access to and copies of all public records related to the investigation of the serial killer known as the "Doodler," who is believed to be responsible for a series of murders and assaults in San Francisco between January 1974 and September 1975.

To assist in your search, the perpetrator was also known by the moniker "the Black Doodler," and the crimes primarily targeted gay white men in the city. The suspect was described as a Black male, approximately 19-25 years old at the time of the crimes, who would often sketch his victims before the attacks.

I am requesting the following records:

All initial and follow-up police reports related to the confirmed victims of the Doodler, including but not limited to: Gerald Earl Cavanagh, Joseph "Jae" Stevens, Klaus Achim Christmann, Frederick Capin, Harald Gullberg, and Warren Andrews.

All investigative notes, memos, and correspondence related to the Doodler case.

All forensic and crime scene reports, including autopsy reports, ballistics, and any DNA evidence that has been collected and analyzed.

All witness statements and interview transcripts with survivors, witnesses, and any persons of interest, including the "strong suspect" who was interviewed in January 1976.

All composite sketches and age-progression images of the suspect that have been created and released to the public.

Any and all records related to the reward offered for information leading to the identification, apprehension, and conviction of the suspect.

Any and all press releases and public communications issued by the San Francisco Police Department regarding the Doodler case.

Any documents that discuss potential connections to other unsolved murders in the Bay Area or other jurisdictions.

If any portion of this request is denied, please provide a written explanation for the denial, citing the

specific statutory exemption(s) that justify the withholding of the records.

The California Public Records Act requires a response within 10 days. I look forward to your prompt response.

Thank you for your time and assistance.

Sincerely,

[Your Name]

[Your Contact Information]

Incident Number:		<i>if known</i>
Police Officer(s) Involved:		<i>if known</i>
Time of Incident:		<i>specify AM or PM, if known</i>
Date Range From:	1/1/1974	<i>if applicable</i>
Date Range To:	9/30/1975	<i>if applicable</i>
Preferred Method to Receive Records:	Electronic via Records Center	

#### ▼ Public Records Archive Summary

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Will you post this request to the online archive?:

#### > Create an Activity to Retrieve Records

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#### > Send for Review

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#### > Time Extension

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#### > Denials, Exemptions & Redaction Codes

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#### > Cost Estimate/Payment Details

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#### > Clarification

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#### ▼ Trending -- Internal Use Only

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Trend As:	(select all that apply)
Body Cam Video Included:	
Total Number of Videos requested:	
Total length of all the videos requested:	Please enter this value in MINUTES
Total Number of Videos Pending:	
Total length of all videos pending:	Please enter this value in MINUTES

#### > Day Counter

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#### ▼ Notes

Note

Created

Modified

I have reviewed the customer's update and advised Legal OIC and CAO (Huber).	9/29/2025 8:22:00 AM by Christopher Campbell	9/29/2025 8:22:00 AM by Christopher Campbell
Response approved by Sgt Polovina	9/12/2025 1:01:00 PM by Christopher Campbell	9/12/2025 1:01:00 PM by Christopher Campbell
Per previous request from 2024 and research regarding any changes in status since my last request to Homicide (Cold Case) this case remains OPEN / UNSOLVED COLD CASE	9/12/2025 12:46:00 PM by Christopher Campbell	9/12/2025 12:46:00 PM by Christopher Campbell

▼ **Message History**

Date

On 9/27/2025 9:21:18 AM, Jared Stratton wrote:



Date

TO: "SANFRANCISCOPD Support"[sanfranciscopd@govqa.us]

CC: [budget@sfcityattys.org], "Amber Lee"[Amber.Lee@foxtv.com]

## A Legal Analysis and Strategic Appeal Concerning the San Francisco Police Department's Denial of Public Records on the "Doodler" Serial Killer Investigation

### I. The Doodler Murders: A Legacy of Fear and Unanswered Questions

#### A. Historical Context: Terror in 1970s San Francisco

Between January 1974 and September 1975, a pall of fear descended upon San Francisco's burgeoning gay community. A serial predator, later dubbed "The Doodler," was responsible for a series of exceptionally brutal assaults and murders that left a trail of terror and unanswered questions that persist to this day.<sup>1</sup> The known victims of this rampage represent a tragic loss of life, each a story cut short by senseless violence: Gerald Earl Cavanagh, 49; Joseph "Jae" Stevens, 27; Klaus Achim Christmann, 31; Frederick Elmer Capin, 32; and Harald Gullberg, 66.1 In early 2022, the San Francisco Police Department (SFPD) officially linked a sixth victim to the case: Warren Andrews, 52, who was assaulted at Land's End on April 27, 1975, and died several weeks later without ever regaining consciousness.<sup>3</sup> The Doodler may be responsible for as many as sixteen murders in total.<sup>1</sup>

The killer's method was consistent and chilling. He targeted white gay men, meeting them in the city's gay nightclubs, bars, and late-night diners—places that were supposed to be sanctuaries in an often-hostile world.<sup>1</sup> His moniker, "The Doodler," derived from his habit of sketching his victims, using his artistic talent as a pretext to initiate conversation before luring them to secluded locations like Ocean Beach or Golden Gate Park, where he would brutally stab them to death.<sup>1</sup> The attacks on Cavanagh, Christmann, and Capin all occurred at Ocean Beach, while Stevens was found in Golden Gate Park and Gullberg near the Lincoln Park Golf Course.<sup>1</sup> This pattern of violence created an atmosphere of profound fear in a community that was simultaneously fighting for liberation and visibility. The very spaces that defined the gay liberation movement in 1970s San Francisco were transformed into hunting grounds.<sup>5</sup>

The original investigation by the SFPD was fraught with challenges, many of which were emblematic of the era's deep-seated societal homophobia and the resulting mistrust between the gay community and law enforcement.<sup>8</sup> While detectives Earl Sanders and Rotea Gilford pursued the case, they faced significant hurdles.<sup>2</sup> A prime suspect, described as a young Black man, was identified and questioned in 1976.<sup>1</sup> However, the case against him could not proceed. Three surviving victims, including a "well-known entertainer" and a diplomat, were unwilling to testify in court, fearing that doing so would publicly expose their homosexuality, potentially costing them their careers, families, and social standing.<sup>1</sup> This critical failure to secure a prosecution allowed a man whom police "strongly believed" was a serial killer to walk free, and the case eventually went cold.<sup>1</sup>

#### B. The "Cold Case" Reawakens: SFPD's Modern Public Engagement

For decades, the Doodler case remained a dark, unresolved chapter in San Francisco's history, largely forgotten by the public but a persistent source of pain for the victims' families and the gay community. However, in recent years, a combination of renewed media interest and new investigative efforts by the SFPD has thrust the case back into the public spotlight.<sup>2</sup> This modern phase of the investigation is characterized by the SFPD's active and repeated public engagement, a strategy that stands in stark contrast to its current legal posture of secrecy.

Beginning in February 2019, the SFPD held a news conference to announce a renewed push to solve the case. They released a 1975 forensic sketch of the suspect alongside a new, age-progressed rendering of what he might look like four decades later.<sup>1</sup> At the same time, the department announced a \$100,000 reward for information leading to the killer's arrest and conviction and released audio from a 1974 911 call reporting the discovery of a body at Ocean Beach.<sup>10</sup> This was a clear and deliberate solicitation of public assistance.

The SFPD has since escalated its public campaign. In January 2022, the reward was doubled to \$200,000.<sup>3</sup> One year later, in January 2023, the department increased it again, to \$250,000, marking the 49th anniversary of the first murder.<sup>13</sup> In public statements accompanying these announcements, the SFPD has not been coy about the status of its investigation. Investigators have confirmed that the man identified in 1976 is still considered a "strong person of interest" and, most alarmingly, that he is believed to be "alive and living in the Bay Area".<sup>14</sup>

This series of public actions—press conferences, reward offers, the release of sketches and audio evidence, and explicit statements about a living suspect—has fundamentally altered the nature of the Doodler investigation. It is no longer a confidential, internal police matter. The SFPD has, by its own volition, transformed it into a public-private partnership, deputizing the citizenry as its eyes and ears and leveraging a quarter-million dollars in public funds to incentivize their participation. This active solicitation of public help is irreconcilable with the department's subsequent legal claim that the foundational documents of the very same investigation are too sensitive for public disclosure. The department's actions have created a powerful contradiction: it asks the public for help while simultaneously insisting that the public has no right to know the basic facts of the case it is being asked to help solve.

Furthermore, the official narrative that the case stalled solely because of "uncooperative victims" demands deeper scrutiny, which only access to the records can provide. While the fear of being outed was undoubtedly a real and powerful deterrent in the 1970s, a complete historical accounting requires an examination of the SFPD's own actions. The investigatory files are essential to understanding whether the department made every reasonable effort to build trust and provide assurances to these traumatized victims, or if institutional indifference or hostility toward the gay community contributed to the investigation's failure. The public has a compelling interest in reviewing these files to determine whether this historical narrative has served as a convenient excuse for a case that was, for reasons of prejudice, allowed to go cold.

### II. The Presumption of Transparency Under the California Public Records Act (CPRA)

#### A. A Constitutional Mandate for Openness

Any analysis of a public records dispute in California must begin not with the statutory exemptions, but with the foundational principle of transparency enshrined in the state's Constitution. In 2004, California voters overwhelmingly approved Proposition 59, which amended the Constitution to include a public right of access to government information. Article I, Section 3(b) now declares: "The people have the right of access to information concerning the conduct of the people's business, and, therefore, the meetings of public bodies and the writings of public officials and agencies shall be open to public scrutiny".<sup>16</sup>



This "Sunshine Amendment" is not mere aspirational language; it is a constitutional mandate that provides the interpretive lens through which the California Public Records Act (CPRA) must be viewed.<sup>17</sup> It establishes that access to information is a "fundamental and necessary right of every person in this state".<sup>16</sup> The practical effect of this constitutional status is profound. It requires that the CPRA, and particularly its exemptions from disclosure, be narrowly construed. When there is ambiguity, the law demands that it be resolved in favor of disclosure, not secrecy.<sup>20</sup> The SFPD's denial of access to the Doodler files must therefore be measured against this high constitutional standard, which places a heavy thumb on the scale in favor of transparency.

#### B. The CPRA Framework: Disclosure as the Default

The CPRA, codified at California Government Code § 7920.000 et seq., operationalizes the constitutional right of access. The Act's basic structure is straightforward and intentionally broad: all public records are subject to disclosure unless they fall within a specific exemption articulated in the statute.<sup>21</sup> The definition of a "public record" is expansive, encompassing "any writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics".<sup>23</sup> This definition easily covers the entirety of the SFPD's investigatory file on the Doodler murders, from handwritten notes and witness statements from the 1970s to modern digital analyses.<sup>21</sup>

Crucially, the CPRA places the burden of proof squarely on the government agency seeking to withhold a record.<sup>25</sup> The SFPD cannot simply assert that a record is exempt; it must demonstrate that a specific statutory exemption applies to the facts of the case. The denial letter sent by Lieutenant William Heppler, which merely cites Cal. Govt. Code § 7923.600, is legally insufficient on its face. The CPRA requires an agency to do more than name an exemption; it must "promptly inform the requester of its decision and the reasons therefor".<sup>19</sup> A simple citation to a statute is a legal conclusion, not a reason. A proper justification would require a factual explanation as to

why disclosure of these specific, 50-year-old records would "endanger successful completion of that investigation." For example, a valid reason might be that disclosure would reveal the identity of a living confidential informant or compromise a specific, ongoing surveillance operation. In the absence of such a factual, case-specific justification, the SFPD's denial is both procedurally and substantively deficient, failing to meet the basic requirements of the Act. The department has not sustained its legal burden to justify secrecy.

#### III. Confronting the Shield: An Analysis of the Investigatory Files Exemption (§ 7923.600)

##### A. The Scope of the Exemption

The SFPD's denial rests entirely on a single provision of the CPRA: California Government Code § 7923.600 (formerly § 6254(f)). This section provides a powerful exemption for law enforcement agencies, stating that the CPRA "does not require the disclosure of records of complaints to, or investigations conducted by, or records of intelligence information or security procedures of... any state or local police agency".<sup>26</sup> This is, without question, one of the broadest and most frequently invoked exemptions in the Act.<sup>21</sup>

The strength of this exemption was solidified by the California Supreme Court in *Williams v. Superior Court* (1993) 5 Cal.4th 337. In that landmark case, the court held that the investigatory files exemption is not temporal; it does not expire once an investigation becomes inactive or is formally closed.<sup>28</sup> The court reasoned that the Legislature intended to create a durable protection for investigatory files to safeguard the integrity of law enforcement operations, protect the privacy of those involved, and encourage witnesses to come forward without fear of future exposure.<sup>29</sup> The

*Williams* decision established that as long as a record was compiled for law enforcement investigatory purposes, it can remain exempt from disclosure indefinitely, regardless of the case's current status. This precedent is the primary legal pillar supporting the SFPD's position and must be directly addressed.

##### B. Distinguishing *Williams* and Challenging the Exemption's Applicability

While acknowledging the authority of *Williams*, it is critical to argue that its mechanical application to the extraordinary facts of the Doodler case is unreasonable and produces a result that is antithetical to the core principles of the CPRA. The facts of *Williams*—which involved a newspaper's request for records of an internal affairs investigation into deputy misconduct during a drug raid that had occurred a few years prior—are worlds away from the present request for files on a half-century-old serial murder investigation.<sup>29</sup>

The fundamental purpose of the investigatory exemption is to prevent tangible harm to active law enforcement efforts. These harms typically include endangering the safety of witnesses or informants, revealing confidential investigative techniques, prompting the destruction of evidence, or allowing a suspect to evade capture.<sup>20</sup> After the passage of nearly 50 years, these justifications have been almost entirely eroded in the Doodler case.

**Witness Safety:** Many witnesses, informants, and even the original investigators from the 1970s are likely deceased. The privacy and safety interests of any who survive can be effectively protected through the redaction of names and identifying information.

**Investigative Techniques:** The police methods of 1975—relying on shoe-leather detective work, witness interviews, and rudimentary forensics—are of purely historical interest. Their disclosure poses no threat to modern law enforcement operations, which now rely on DNA analysis, genetic genealogy, and digital forensics.<sup>1</sup>

**Destruction of Evidence:** All physical evidence was collected and secured decades ago.

**Suspect Evasion:** The SFPD has publicly stated it knows who the prime suspect is and where he lives.<sup>14</sup> The risk of him evading capture is not a function of public records disclosure but of the SFPD's own decision not to seek an arrest.

The SFPD's conclusory claim that disclosure "may endanger successful completion of that investigation" is, therefore, highly speculative and lacks credibility. A modern investigation into a 50-year-old crime will not be solved by 1970s-era witness statements, but by new leads generated from public appeals and advances in forensic science. It is far more likely that disclosure, not secrecy, would aid the investigation's completion by jogging memories and encouraging individuals with long-held information to finally come forward.

Furthermore, applying the *Williams* precedent to a "cold case" of this vintage creates a legal fiction that fundamentally undermines the CPRA. By simply labeling the Doodler file as part of an "open investigation," the SFPD can claim a right to perpetual secrecy. A case with no arrests or significant developments in nearly five decades is "open" only in a technical, administrative sense. To allow an agency to shield records from public scrutiny forever, simply by refusing to ever formally close a case, creates a loophole that would swallow the public's constitutional right of access. This would allow files on California's most notorious unsolved historical crimes—from the Zodiac to the Doodler—to remain locked away indefinitely, preventing any form of public or historical review and rendering the government's handling of these cases completely unaccountable. Such an absurd result cannot be what the Legislature or the voters intended.



#### IV. Tipping the Scales: The Overwhelming Public Interest in Disclosure

##### A. Invoking the Public Interest Balancing Test

Even if the Doodler file is found to fall within the technical definition of the investigatory records exemption, the CPRA provides a powerful mechanism to compel its disclosure. This is the "catch-all" provision, codified at Government Code § 7922.000 (formerly § 6255), which functions as a public interest balancing test.<sup>33</sup> This provision permits an agency to withhold a record only if it can demonstrate that "on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record".<sup>31</sup>

This is a high bar for the government to meet. It requires a case-by-case analysis of the specific facts and a clear showing that the interests in secrecy are not just present, but paramount.<sup>34</sup> The SFPD's denial letter makes no attempt to conduct this balancing test or to articulate any public interest in nondisclosure. When this test is applied to the unique and compelling facts of the Doodler case, the scale tips overwhelmingly in favor of disclosure. This conclusion is supported by four distinct pillars of public interest.

##### B. Pillar 1: The Urgent Public Safety Interest

The request for the Doodler files is not merely a matter of historical curiosity; it is a matter of immediate and pressing public safety. The SFPD has publicly confirmed that its prime suspect—a man it believes is responsible for a string of brutal serial murders—is alive and residing in the Bay Area.<sup>14</sup> This stunning admission transforms the entire calculus of the public interest.

The community has an urgent, fundamental interest in understanding the threat posed by this individual. The public has a right to know why a person identified as a likely serial killer nearly 50 years ago has been allowed to live freely in the community without arrest or prosecution. The investigatory files are essential to answering critical questions: What is the evidence linking this individual to the crimes? Has he been monitored by law enforcement? Has he been investigated in connection with any other violent crimes in the intervening decades? Is he still considered a danger to the public? The SFPD's refusal to release these records, in light of its own public statements, amounts to withholding vital public safety information. The interest in protecting the community from a potential, known threat far outweighs any residual interest in maintaining the confidentiality of a dormant 50-year-old investigation.

##### C. Pillar 2: The Imperative of Government Accountability

A core purpose of the CPRA is to ensure government accountability by allowing the public to monitor the performance of its officials and agencies.<sup>19</sup> As the California Supreme Court held in *CBS, Inc. v. Block* (1986) 42 Cal.3d 646, the public has a right to access records to determine whether government power is being exercised legally and without abuse.<sup>35</sup> The Doodler case represents a profound, multi-generational failure of the justice system, and the public has a compelling interest in scrutinizing the SFPD's role in that failure.

Disclosure of the files is necessary to assess the adequacy of the SFPD's investigation, both in the 1970s and today.

**Historical Accountability:** Was the original investigation hampered by institutional homophobia or a deprioritization of crimes against gay men? Did detectives take all reasonable steps to protect and encourage traumatized victims to testify? Or was the fear of victims used as a convenient excuse to abandon a difficult case? The public has a right to review the historical record and judge for itself.

**Contemporary Accountability:** Why has the known suspect not been arrested and charged? Has the District Attorney's office reviewed the case and declined to prosecute? If so, on what grounds? Has the SFPD been diligent in pursuing new leads or applying modern forensic techniques over the past five decades?

These are not idle questions. They go to the heart of the public's right to oversee its police department and ensure it is performing its duties diligently, effectively, and without prejudice. Secrecy in this context serves only to shield the department from scrutiny over its decades-long handling of one of the city's most infamous unsolved serial murder cases.

##### D. Pillar 3: The Evaporation of the Government's Interest in Nondisclosure

The balancing test is not static; it is a dynamic assessment that must account for the passage of time. While the government's interest in nondisclosure may have been compelling in 1976, it has dramatically diminished to the point of being negligible today. The original justifications for the investigatory exemption have evaporated over the last five decades. The privacy interests of most individuals involved are minimal and can be protected by redaction, and the strategic value of the information in the files is nonexistent.

In contrast, the public interest in disclosure has only grown stronger over time. What was once solely an interest in solving a contemporary crime has now evolved into a multi-faceted interest encompassing public safety, historical justice for a marginalized community, and a critical examination of long-term government performance. The SFPD's denial implicitly weighs the interests as if the murders occurred last year. A proper application of the balancing test must be based on the realities of 2024, where the government's interest in secrecy is speculative and weak, while the public's interest in disclosure is concrete and overwhelming.

##### E. Pillar 4: The SFPD's De Facto Waiver of Secrecy

Perhaps the most compelling argument against the SFPD's position is one created by the department itself. Through its extensive public relations campaign, the SFPD has effectively waived its right to claim that absolute secrecy is essential to the investigation. An agency cannot simultaneously make an investigation a matter of intense public participation while claiming the underlying files are too sensitive to be seen. The department has deliberately and repeatedly injected information from the investigation into the public domain to solicit help:

It released a 1975 forensic sketch and a modern, age-progressed version.<sup>10</sup>

It released audio of a 1974 911 call.<sup>10</sup>

It has held multiple press conferences to discuss the case.<sup>10</sup>

It is actively promoting a \$250,000 reward for public information.<sup>13</sup>

These actions are a tacit admission by the SFPD that public engagement, not secrecy, is the key to solving this case. It is illogical and legally untenable for the department to argue that releasing a 50-year-old witness statement would "endanger" an investigation that it is actively publicizing through press releases and six-figure rewards. The SFPD's own conduct demonstrates that the public interest in disclosure does not conflict with the investigation's success; rather, it is integral to it. By making the investigation a public affair, the department has fatally undermined its own legal justification for withholding the case file.



## V. The Mandate for Partial Disclosure: A Demand for Redacted Files

Even if the SFPD continues to assert that some portions of the Doodler file are exempt, the CPRA does not permit a blanket denial. The Act contains an explicit and mandatory duty to segregate and redact. Government Code § 7922.525(b) states that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law".<sup>25</sup>

This is not a discretionary choice for the SFPD; it is a legal requirement.<sup>19</sup> The burden rests with the agency to demonstrate that non-exempt material cannot be reasonably segregated from exempt material, a burden that is nearly impossible to meet with respect to a 50-year-old case file.<sup>34</sup> A wholesale refusal to release any part of the file constitutes a clear violation of this statutory mandate.

Therefore, as a compelling alternative to the demand for the complete file, the SFPD must be required to conduct a line-by-line review of the entire Doodler investigatory file and release all non-exempt information with appropriate redactions. This would force the agency's legal team to justify each and every redaction, a process that is itself a powerful tool for transparency. The administrative burden of such a review can incentivize a more forthcoming disclosure, as the agency may determine it is more efficient to release non-controversial material than to litigate over every page.

At a minimum, the following categories of information within the file are likely non-exempt or contain substantial portions of non-exempt information that must be disclosed:

**Basic Factual Information:** The time, substance, and location of the crimes; the description of property involved; and the names of victims.

Much of this is required to be disclosed under other sections of the CPRA, such as § 7923.610.<sup>39</sup>

**Coroner's Reports and Autopsy Files:** These are often considered distinct from investigatory files and provide critical factual information.

**Investigative Timelines and Chronologies:** Documents outlining the steps taken in the investigation.

**Forensic and Ballistics Reports:** The factual findings of these reports, with any information revealing sensitive techniques redacted.

**Inter-Agency Correspondence:** Communications that do not reveal confidential sources or investigative strategy.

Demanding this partial disclosure is a reasonable, legally grounded fallback position that exposes a blanket denial as an act of bad faith and obstruction. Even a heavily redacted file can provide a crucial roadmap for understanding the investigation and can form the basis for more targeted future requests or litigation.

## VI. Strategic Recommendations and Path Forward

### A. The Formal Appeal Letter

The analysis contained in this report provides the foundation for a formal, comprehensive, and compelling appeal letter to be sent to Lieutenant William Heppler and the SFPD Legal Division. This letter should not merely restate the request but should systematically deconstruct the department's denial. It must articulate the constitutional presumption of access, challenge the applicability of the investigatory exemption to this unique case, present the multi-faceted public interest argument for disclosure, and demand, at a minimum, the release of all reasonably segregable records. The letter should be assertive, meticulously citing the relevant statutes and judicial precedents outlined in this report, and should clearly state the legal and public policy grounds upon which the SFPD's denial is being challenged.

### B. Escalation: The San Francisco Sunshine Ordinance

Should the SFPD maintain its position and deny the appeal, there is a specific and powerful local remedy available. The San Francisco Sunshine Ordinance provides an administrative appeal process that is distinct from and in addition to filing a lawsuit. Under Administrative Code § 67.21(d), a requester who has been denied records may file a petition with the San Francisco City Attorney, who is designated as the "Supervisor of Records".<sup>42</sup>

The Supervisor of Records is empowered to review the withheld documents and issue a determination as to whether they are public. This process is often sufficient to secure compliance informally. If the City Attorney determines the records should be disclosed, and the department still refuses, the City Attorney is authorized to take necessary measures to secure compliance.<sup>42</sup> The formal appeal letter to the SFPD should explicitly state the intent to file such a petition with the Supervisor of Records if the denial is not reversed within a reasonable timeframe. This puts the department on notice that there is a clear, immediate, and cost-effective path for escalation, adding significant pressure for them to reconsider their position and comply with the law.

### C. Summary of Legal Arguments for Disclosure

The following table synthesizes the core legal arguments that form the basis of the appeal, providing a concise and powerful summary of the case for disclosure.

Table 1: Summary of Legal Arguments for Disclosure of the "Doodler" Investigatory Files			
Legal Argument	Primary Legal Authority	Application to the Doodler Case	
Constitutional Right of Access	Cal. Const., art. I, § 3(b)	The CPRA must be interpreted broadly in favor of disclosure as a matter of fundamental, constitutional right, with exemptions narrowly construed.	Urgent Public Safety Interest
CPRA Balancing Test	Cal. Govt. Code § 7922.000	The public has an overwhelming safety interest in records concerning a known serial killer suspect who the SFPD states is alive and at large in the community.	Public Interest in Government Accountability
CBS, Inc. v. Block (1986)	42 Cal.3d 646	The public has a right to scrutinize the SFPD's 50-year handling of the case to assess for diligence, effectiveness, and potential institutional bias.	Temporal Erosion of Exemption's Purpose
Application of facts to Cal. Govt. Code § 7923.600	The original justifications for secrecy (witness safety, investigative techniques, etc.) have largely vanished after five decades, making the exemption's application unreasonable.	Agency Waiver by Public Solicitation	SFPD Press Releases (2019-2023); Reward Announcements
The SFPD cannot claim a need for secrecy while simultaneously running a public campaign with a \$250,000 reward, effectively waiving the exemption.	Mandatory Duty to Segregate and Redact	Cal. Govt. Code § 7922.525	Even if parts of the file are exempt, the SFPD is legally required to release all non-exempt portions after redacting sensitive information. A blanket denial is unlawful.
Local Administrative Appeal	S.F. Administrative Code § 67.21(d)	An immediate, formal appeal process exists through the San Francisco Supervisor of Records, providing a clear path for escalation if the SFPD remains non-compliant.	

Jared Stratton

Date

Attachments:

Response.pdf

San\_Francisco\_police\_post\_reward\_for\_serial\_killer\_dubbed\_the\_\_Doodler\_\_\_\_Reuters.pdf

On 9/12/2025 1:33:15 PM, Christopher Campbell wrote:

**Subject:** Public Records Request :: P223477-091225

**Body:**

September 12, 2025

*Via email J.stratton25@gmail.com*

Jared Stratton

5575 Greenridge Road

Castro Valley , CA 94552

RE: Public Records Request, dated September 12, 2025, Reference # P223477-091225

Dear Jared Stratton:

In response to your request, please see attached document(s).

Sincerely,

Lieutenant William Heppler #1726

Officer In Charge

Risk Management - Legal Division

On 9/12/2025 1:18:03 PM, Jared Stratton wrote:

TO: "SANFRANCISCOPD Support"[sanfranciscopd@govqa.us]

That's not at all was requested. Sending a link to a news article is insulting.

How about you send over what was requested or a reason on why you cant.

Jared Stratton

On Fri, Sep 12, 2025, 1:12 PM SANFRANCISCOPD Support wrote:

Attachments:

Response.pdf

San\_Francisco\_police\_post\_reward\_for\_serial\_killer\_dubbed\_the\_\_Doodler\_\_\_\_Reuters.pdf

On 9/12/2025 1:12:22 PM, Christopher Campbell wrote:

**Subject:** Public Records Request :: P223477-091225

**Body:**

September 12, 2025

*Via email J.stratton25@gmail.com*

Jared Stratton

5575 Greenridge Road

Castro Valley , CA 94552

RE: Public Records Request, dated September 12, 2025, Reference # P223477-091225

Dear Jared Stratton:

In response to your request, please see attached document(s).

Sincerely,

Lieutenant William Heppler #1726

Officer In Charge

Risk Management - Legal Division



Date

On 9/12/2025 11:50:22 AM, System Generated Message:

**Subject:** San Francisco Police Public Records Request :: P223477-091225

**Body:**



Dear Jared Stratton:

Thank you for your interest in public records of the San Francisco Police Department ("SFPD").

The San Francisco Police Department ("SFPD") received your request, dated September 12, 2025 and given the reference number **P223477-091225** for tracking purposes.

Record(s) Requested: Gemini 2.5 Pro PRO Conversation with Gemini Gemini write me a records request for the following link using its criteria. We want all records related to the serial killer the Doodler in San Francisco California. Use deep research on all articles and if you can use a logical answer on the subject besides his nickname Show thinking In response to your request, I have drafted a detailed public records request for information regarding the "Doodler" serial killer. Below you will find the text for the request, information on where to submit it, and a summary of the case based on my research. Records Request Regarding the "Doodler" Serial Killer To: Custodian of Records San Francisco Police Department Subject: Public Records Act Request for Records Pertaining to the "Doodler" Serial Killer Investigation Dear Custodian of Records, Pursuant to the California Public Records Act (Government Code § 6250 et seq.) and San Francisco's Sunshine Ordinance, I am requesting access to and copies of all public records related to the investigation of the serial killer known as the "Doodler," who is believed to be responsible for a series of murders and assaults in San Francisco between January 1974 and September 1975. To assist in your search, the perpetrator was also known by the moniker "the Black Doodler," and the crimes primarily targeted gay white men in the city. The suspect was described as a Black male, approximately 19-25 years old at the time of the crimes, who would often sketch his victims before the attacks. I am requesting the following records: All initial and follow-up police reports related to the confirmed victims of the Doodler, including but not limited to: Gerald Earl Cavanagh, Joseph "Jae" Stevens, Klaus Achim Christmann, Frederick Capin, Harald Gullberg, and Warren Andrews. All investigative notes, memos, and correspondence related to the Doodler case. All forensic and crime scene reports, including autopsy reports, ballistics, and any DNA evidence that has been collected and analyzed. All witness statements and interview transcripts with survivors, witnesses, and any persons of interest, including the "strong suspect" who was interviewed in January 1976. All composite sketches and age-progression images of the suspect that have been created and released to the public. Any and all records related to the reward offered for information leading to the identification, apprehension, and conviction of the suspect. Any and all press releases and public communications issued by the San Francisco Police Department regarding the Doodler case. Any documents that discuss potential connections to other unsolved murders in the Bay Area or other jurisdictions. If any portion of this request is denied, please provide a written explanation for the denial, citing the specific statutory exemption(s) that justify the withholding of the records. The California Public Records Act requires a response within 10 days. I look forward to your prompt response. Thank you for your time and assistance. Sincerely, [Your Name] [Your Contact Information]

Your request is being forwarded to the appropriate department(s) for processing and you will be notified once the request is complete.

You can monitor request progress at the link below. Thank you for using the San Francisco Public Records Center.

San Francisco Police Department

To monitor the progress or update this request please log into the [SFPD Public Records Center](#).

On 9/12/2025 11:50:20 AM, Jared Stratton wrote:

Request Created on Public Portal

## ▼ Request Details

Reference No: P223477-091225

Create Date: 9/12/2025 11:50 AM

Update Date: 9/29/2025 8:22 AM

Completed/Closed: Yes

Close Date: 9/12/2025 1:01 PM

Status: Completed

Priority: Medium

Assigned Dept: Legal

Assigned Staff: Christopher Campbell

Customer Name: Jared Stratton

Email Address: J.stratton25@gmail.com

Phone: 5103631682

Group: (Not Specified)

Source: Web





# Public Records Request (#P225497-092825)

▼ **Public Records Request Details**

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Department:	Legal
Category of Records:	Public Records Request

Describe the Record(s)  
Requested:

Dear Lieutenant Heppler,

This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975.

Our request is grounded in the California Constitution, which establishes that access to government information is a "fundamental and necessary right of every person in this state" (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. Your department's blanket denial, based on a single statutory citation, fails to meet the legal burden of providing a specific, factual justification for withholding records of immense public importance.

While we acknowledge the investigatory files exemption under § 7923.600 and the precedent set by *Williams v. Superior Court* (1993) 5 Cal.4th 337, a mechanical application of this exemption to a nearly 50-year-old case is unreasonable and contrary to the public interest. The original justifications for this exemption—to protect witness safety, prevent the destruction of evidence, and shield investigative techniques—have been eroded to the point of nonexistence by the passage of five decades. To claim that this file remains exempt simply by labeling the case as perpetually "open" creates a legal fiction that would shield the SFPD from all public accountability for its handling of one of San Francisco's most notorious unsolved serial murder cases.

Even if the file technically falls within the exemption, the CPRA's public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy.

**Urgent Public Safety Interest:** The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a "strong person of interest" and, most critically, is believed to be "alive and living in the Bay Area". This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution.

**Government Accountability:** The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-generational failure of the justice system. The public has a right to scrutinize the SFPD's original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department's contemporary handling of the case and understand the specific evidentiary or procedural hurdles that prevent an arrest today.

**Waiver of Secrecy by Public Solicitation:** The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to solicit assistance in this very case. This includes:

Holding multiple press conferences to release details of the investigation.

Publishing a 1975 forensic sketch of the suspect alongside a modern, age-progressed rendering.

Releasing audio from a 1974 911 call related to the discovery of a victim's body.

Increasing a public reward for information to \$250,000.

It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case.

Finally, your blanket denial violates the CPRA's mandatory duty to segregate and redact. Cal. Govt. Code § 7922.525(b) requires that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law." A wholesale refusal to release any part of the file is a clear violation of this statute.

Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. In the alternative, should you maintain that specific portions of the file are lawfully exempt, we demand that you produce the entire file with only those specific portions redacted, accompanied by a detailed index justifying each redaction under law.



Please be advised that if you fail to provide the requested records within the statutory timeframe, we will consider this a final denial. We will then pursue all available legal remedies, including filing a petition with the San Francisco Supervisor of Records under the San Francisco Sunshine Ordinance (S.F. Administrative Code § 67.21(d)) and initiating litigation to compel disclosure under the CPRA.

We expect a prompt and substantive response.

Sincerely,

Jared Stratton

Incident Number:		<i>if known</i>
Police Officer(s) Involved:		<i>if known</i>
Time of Incident:		<i>specify AM or PM, if known</i>
Date Range From:	1/1/1974	<i>if applicable</i>
Date Range To:	1/1/2025	<i>if applicable</i>
Preferred Method to Receive Records:	Electronic via Records Center	

#### ▼ Public Records Archive Summary

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Will you post this request to the online archive?:

#### > Create an Activity to Retrieve Records

---

#### > Send for Review

---

#### > Time Extension

---

#### > Denials, Exemptions & Redaction Codes

---

#### > Cost Estimate/Payment Details

---

#### > Clarification

---

#### ▼ Trending -- Internal Use Only

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Trend As:	(select all that apply)
Body Cam Video Included:	
Total Number of Videos requested:	
Total length of all the videos requested:	Please enter this value in MINUTES
Total Number of Videos Pending:	
Total length of all videos pending:	Please enter this value in MINUTES

#### > Day Counter

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#### ▼ Notes

Note	Created	Modified
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Response approved by Sgt Polovina	9/30/2025 12:19:00 PM by Christopher Campbell	9/30/2025 12:19:00 PM by Christopher Campbell
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▼ **Message History**

Date

On 9/30/2025 12:29:16 PM, Christopher Campbell wrote:

Date

**Subject:** Public Records Request :: P225497-092825

**Body:**

September 30, 2025

Via email [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

Jared Stratton  
5575 Greenridge Road  
Castro Valley, CA 94552

RE: Public Records Request, dated September 28, 2025, Reference # P225497-092825

Dear Jared Stratton:

The San Francisco Police Department (SFPD) received your Public Records Act request, dated September 28, 2025, on September 30, 2025.

You requested, "Dear Lieutenant Heppler,

*This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975.*

*Our request is grounded in the California Constitution, which establishes that access to government information is a "fundamental and necessary right of every person in this state" (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. Your department's blanket denial, based on a single statutory citation, fails to meet the legal burden of providing a specific, factual justification for withholding records of immense public importance.*

*While we acknowledge the investigatory files exemption under § 7923.600 and the precedent set by Williams v. Superior Court (1993) 5 Cal.4th 337, a mechanical application of this exemption to a nearly 50-year-old case is unreasonable and contrary to the public interest. The original justifications for this exemption— to protect witness safety, prevent the destruction of evidence, and shield investigative techniques— have been eroded to the point of nonexistence by the passage of five decades. To claim that this file remains exempt simply by labeling the case as perpetually "open" creates a legal fiction that would shield the SFPD from all public accountability for its handling of one of San Francisco's most notorious unsolved serial murder cases.*

*Even if the file technically falls within the exemption, the CPRA's public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy.*

*Urgent Public Safety Interest: The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a "strong person of interest" and, most critically, is believed to be "alive and living in the Bay Area". This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution.*

*Government Accountability: The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-generational failure of the justice system. The public has a right to scrutinize the SFPD's original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department's contemporary handling of the case and understand the specific evidentiary or procedural hurdles that prevent an arrest today.*

*Waiver of Secrecy by Public Solicitation: The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to solicit assistance in this very case. This includes:*

*Holding multiple press conferences to release details of the investigation.*

*Publishing a 1975 forensic sketch of the suspect alongside a modern, age-progressed rendering.*

*Releasing audio from a 1974 911 call related to the discovery of a victim's body.*

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*It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case.*

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*Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. In the*

Date

*alternative, should you maintain that specific portions of the file are lawfully exempt, we demand that you produce the entire file with only those specific portions redacted, accompanied by a detailed index justifying each redaction under law.*

*Please be advised that if you fail to provide the requested records within the statutory timeframe, we will consider this a final denial. We will then pursue all available legal remedies, including filing a petition with the San Francisco Supervisor of Records under the San Francisco Sunshine Ordinance (S.F. Administrative Code § 67.21(d)) and initiating litigation to compel disclosure under the CPRA.*

*We expect a prompt and substantive response.*

*Sincerely,*

*Jared Stratton"*

Generally, SFPD declines to release records to an open investigation under California Government Code Section 7923.600, which exempts from disclosure records of complaints to, investigations conducted by, intelligence information or security procedures of, and investigatory or security files compiled by local police agencies. As such, we are unable to provide you with the information you seek, as disclosure of information may endanger successful completion of the investigation.

Thank you for your attention.

Sincerely,

Lieutenant William Heppler #1726  
Officer In Charge  
Risk Management - Legal Division

Date

On 9/28/2025 5:57:15 AM, System Generated Message:



Date

**Subject:** San Francisco Police Public Records Request :: P225497-092825

**Body:**



Dear Jared Stratton:

Thank you for your interest in public records of the San Francisco Police Department ("SFPD").

The San Francisco Police Department ("SFPD") received your request, dated September 28, 2025 and given the reference number **P225497-092825** for tracking purposes.

Record(s) Requested: *Dear Lieutenant Heppler, This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975. Our request is grounded in the California Constitution, which establishes that access to government information is a "fundamental and necessary right of every person in this state" (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. 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Even if the file technically falls within the exemption, the CPRA's public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy. Urgent Public Safety Interest: The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a "strong person of interest" and, most critically, is believed to be "alive and living in the Bay Area". This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution. Government Accountability: The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-generational failure of the justice system. The public has a right to scrutinize the SFPD's original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department's contemporary handling of the case and understand the specific evidentiary or procedural hurdles that prevent an arrest today. Waiver of Secrecy by Public Solicitation: The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to solicit assistance in this very case. This includes: Holding multiple press conferences to release details of the investigation. Publishing a 1975 forensic sketch of the suspect alongside a modern, age-progressed rendering. Releasing audio from a 1974 911 call related to the discovery of a victim's body. Increasing a public reward for information to \$250, 000. It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case. Finally, your blanket denial violates the CPRA's mandatory duty to segregate and redact. Cal. Govt. Code § 7922.525(b) requires that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law." A wholesale refusal to release any part of the file is a clear violation of this statute. Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. 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Your request is being forwarded to the appropriate department(s) for processing and you will be notified once the request is complete.

You can monitor request progress at the link below. Thank you for using the San Francisco Public Records Center.

San Francisco Police Department

To monitor the progress or update this request please log into the [SFPD Public Records Center](#).

Date

On 9/28/2025 5:57:14 AM, Jared Stratton wrote:  
Request Created on Public Portal

## ▼ Request Details

---

Reference No: P225497-092825  
Create Date: 9/28/2025 5:57 AM  
Update Date: 9/30/2025 12:20 PM  
Completed/Closed: Yes  
Close Date: 9/30/2025 12:20 PM

Status: Completed  
Priority: Medium  
Assigned Dept: Legal  
Assigned Staff: Christopher Campbell

Customer Name: Jared Stratton  
Email Address: j.stratton25@gmail.com  
Phone: 5103631682  
Group: (Not Specified)

Source: Web



# Complaint Summary

**Sunshine Ordinance Task Force  
Complaint Summary**

File No. 25075

Jared Stratton against San Francisco Police Department

Date filed with SOTF: 9/30/2025

Contact information:

Party	Name(s)	Email(s)	Telephone
Petitioner	Jared Stratton	j.stratton25@gmail.com	(510) 363-1682
Respondent	William Heppler	william.heppler@sfgov.org	

---

**File No. 25075:** Complaint filed by Jared Stratton against San Francisco Police Department for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.21, by failing to respond to a public records request in a timely and/or complete manner.

Administrator's Notes

■

# Complaint

**From:** [Google Forms](#)  
**To:** [SOTF \(BOS\)](#)  
**Subject:** New Response Complaint Form  
**Date:** Tuesday, September 30, 2025 12:37:17 PM

---

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Your form has a new entry. Here are the results.

<b>Complaint against which Department or Commission</b>	SFPD
<b>Name of individual contacted at Department or Commission</b>	Lieutenant Heppler
<b>Alleged Violation</b>	Public Records
<b>Sunshine Ordinance Section:</b>	San Francisco Administrative Code § 67.21
	<p>Dear Lieutenant Heppler,</p> <p>This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975.</p> <p>Our request is grounded in the California Constitution, which establishes that access to government information is a "fundamental and necessary right of every person in this state" (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. Your department's blanket denial, based on a single statutory citation, fails to meet the legal burden of providing a specific, factual justification for withholding records of immense public importance.</p> <p>While we acknowledge the investigatory files exemption under § 7923.600 and the precedent set by <i>Williams v.</i></p>

**Please describe alleged violation**

Superior Court (1993) 5 Cal.4th 337, a mechanical application of this exemption to a nearly 50-year-old case is unreasonable and contrary to the public interest. The original justifications for this exemption—to protect witness safety, prevent the destruction of evidence, and shield investigative techniques—have been eroded to the point of nonexistence by the passage of five decades. To claim that this file remains exempt simply by labeling the case as perpetually "open" creates a legal fiction that would shield the SFPD from all public accountability for its handling of one of San Francisco's most notorious unsolved serial murder cases.

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Sincerely,  
Jared Stratton

<b>Date</b>	September 30th 2025
<b>Name</b>	Jared Stratton
<b>Address</b>	5575 Greenridge Rd
<b>City</b>	Castro Valley
<b>Zip</b>	94552
<b>Telephone</b>	5103631682
<b>Email</b>	<a href="mailto:j.stratton25@gmail.com">j.stratton25@gmail.com</a>

# Complainant's Supporting Documents

**From:** [Great Deeds](#)  
**To:** [SOTF \(BOS\)](#)  
**Cc:** [Somera, Alisa \(BOS\)](#)  
**Subject:** Re: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)  
**Date:** Tuesday, September 30, 2025 2:34:16 PM  
**Attachments:** [image001.png](#)  
[image001.png](#)

Yes that was the record request with the SFPD blanket denial response. I have included the original request in the text below and included a screenshot. Let me know if you need anymore information or if this is sufficient.

I see the October 1st meeting is canceled do you have a rescheduled date yet?

Thanks again,

Jared Stratton

[Skip to content](#)

MENU

Select Language

Public Records Request

Public Records Portal

**Request Type:**

Public  
Jared Stratton  
Records  
Request

**Description:**

On Tue, Sep 30, 2025, 2:28 PM SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)> wrote:

Public Records  
are defined as  
Hello, Mr. Stratton  
any writing  
containing  
information

Thank you for your response to our request for supporting documents.

conduct of  
the public's  
business.

The Police Department's email [below] contains the text of your 9/28/2025 Public  
Records Act request in italics. Are we to consider that italicized text to be the  
documentation of your records request? Typically, we receive the initial request directly  
from the Petitioner so as to ensure its accuracy and the date that it was sent.

owned, used  
or retained by  
any state or  
local agency  
regardless of

Best,  
physical form  
or  
Pat  
characteristics.

**Contact E-Mail:**

[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

**Reference No:**


*Patricia Petersen* (she/her)  
P225497-  
092825

**Status:**

Assistant Clerk  
Completed  
Board of Supervisors

**Describe the Record(s) Requested:**

Dear  
[1 Dr. Carlton B. Goodlett Place, Room 244](#)  
Lieutenant  
Hepler, This  
letter is a  
[sotf@sfgov.org](mailto:sotf@sfgov.org) formal request  
of the San  
Francisco  
Police

 Click [here](#) to complete a Board of Supervisors Customer Service Satisfaction form.



Department's (SFPD) denial  
The [Legislative Research Center](#) provides 24-hour access to Board of Supervisors legislation, and archived matters since August 1998.

records related to the investigation of the serial killer known as the pooper. Your denial letter to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inclusion and copying. The Clerk's Office does not redact any information from these submissions. The only California Government Code 54962, is both procedurally and substantively deficient. We hereby renew our request for the complete

7923.600, is both procedurally and substantively deficient. We hereby renew

**From:** Great Deeds <[jstratton25@gmail.com](mailto:jstratton25@gmail.com)>  
**Sent:** Tuesday, September 30, 2025 2:05 PM  
**To:** SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)>  
**Cc:** Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>  
**Subject:** Fwd: and a Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents for Jared Stratton against San Francisco Police Department (File 25075)

this individual between 1974 and 1975. Our request is grounded in the California Constitution, which establishes that

Jared Stratton's access to government information is a "fundamental and necessary

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

**From:** SAN FRANCISCO PD Support <[sanfranciscopd@govqa.us](mailto:sanfranciscopd@govqa.us)>  
**Date:** Tue, Sep 30, 2025 12:29 PM  
**Subject:** Public Records Request :: P225497-092825  
**To:** [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com) <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

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--- Please respond above this line ---

be narrowly construed in favor of maximum disclosure.

Your department's blanket denial, based on a single statutory

September 30, 2025, fails to meet the legal burden of

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Jared Stratton's immense  
[5575 Greenridge Road](#)



importance.  
[Castro Valley, CA 94552](#)

acknowledge  
the  
investigatory  
files exemption  
under §  
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Dear Jared Stratton: Williams

v. Superior  
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Furthermore,  
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handling of the  
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understand the  
specific  
evidentiary or  
procedural  
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prevent an  
arrest today.  
Waiver of  
Secrecy by  
Public  
Solicitation: The  
SFPD has,  
through its  
own actions,  
waived its right  
to claim that  
secrecy is  
paramount.  
Your  
department  
has engaged in  
a years-long  
public relations  
campaign to  
solicit  
assistance in  
this very case.  
This includes:  
Holding  
multiple press  
conferences to  
release details  
of the  
investigation.  
Publishing a  
1975 forensic  
sketch of the  
suspect  
alongside a  
modern, age-  
progressed  
rendering.  
Releasing  
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related to the  
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Supervisor of  
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the San  
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Sunshine  
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Administrative  
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Sincerely, Jared  
Stratton

**Incident Number:**

*if known*

**Police Officer(s) Involved:**

*if known*

**Time of Incident:**

*specify AM or PM, if known*

**Date Range From:**

01/01/1974  
*if applicable*

**Date Range To:**

01/01/2025  
*if applicable*

**Preferred Method to Receive Records:**

Electronic  
via  
Records  
Center



On 9/30/2025 12:29:16 PM, SANFRANCISCOPD Support wrote:

**Subject:** Public Records Request :: P225497-092825

**Body:**

September 30, 2025

Via email [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

Jared Stratton  
5575 Greenridge Road  
Castro Valley , CA 94552

RE: Public Records Request, dated September 28, 2025, Reference # P225497-092825

Dear Jared Stratton:

The San Francisco Police Department (SFPD) received your Public Records Act request, dated September 28, 2025, on September 30, 2025.

You requested, "Dear Lieutenant Heppler,

*This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975.*

*Our request is grounded in the California Constitution, which establishes that access to government information is a "fundamental and necessary right of every person in this state" (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. Your department's blanket denial, based on a single statutory citation, fails to meet the legal burden of providing a specific, factual justification for withholding records of immense public importance.*

*While we acknowledge the investigatory files exemption under § 7923.600 and the precedent set by Williams v. Superior Court (1993) 5 Cal.4th 337, a mechanical application of this exemption to a nearly 50-year-old case is unreasonable and contrary to the public interest. The original justifications for this exemption—to protect witness safety, prevent the destruction of evidence, and shield investigative techniques—have been eroded to the point of nonexistence by the passage of five decades. To claim that this file remains exempt simply by labeling the case as perpetually "open" creates a legal fiction that would shield the SFPD from all public accountability for its handling of one of San Francisco's most notorious unsolved serial murder cases.*

*Even if the file technically falls within the exemption, the CPRA's public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy.*

*Urgent Public Safety Interest: The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a "strong person of interest" and, most critically, is believed to be "alive and living in the Bay Area". This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution.*

*Government Accountability: The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-generational failure of the justice system. The public has a right to scrutinize the SFPD's original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department's contemporary handling of the case and understand the specific evidentiary or procedural hurdles that prevent an arrest today.*

*Waiver of Secrecy by Public Solicitation: The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to*

*solicit assistance in this very case. This includes:*

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*Publishing a 1975 forensic sketch of the suspect alongside a modern, age-progressed rendering.*

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*Increasing a public reward for information to \$250,000.*

*It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case.*

*Finally, your blanket denial violates the CPRA's mandatory duty to segregate and redact. Cal. Govt. Code § 7922.525(b) requires that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law." A wholesale refusal to release any part of the file is a clear violation of this statute.*

*Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. In the alternative, should you maintain that specific portions of the file are lawfully exempt, we demand that you produce the entire file with only those specific portions redacted, accompanied by a detailed index justifying each redaction under law.*

*Please be advised that if you fail to provide the requested records within the statutory timeframe, we will consider this a final denial. We will then pursue all available legal remedies, including filing a petition with the San Francisco Supervisor of Records under the San Francisco Sunshine Ordinance (S.F. Administrative Code § 67.21(d)) and initiating litigation to compel disclosure under the CPRA.*

*We expect a prompt and substantive response.*

*Sincerely,*

*Jared Stratton"*

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Thank you for your attention.  
Sincerely,

Lieutenant William Heppler #1726  
Officer In Charge  
Risk Management - Legal Division

On 9/28/2025 5:57:15 AM, SANFRANCISCOPD Support wrote:

On 9/28/2025 5:57:14 PM, Patch Stratton wrote:

GovQA is an SFPD authorized third party vendor which facilitates incident report request services for CISU. SFPD accepts no liability for the accuracy of content on the linked GovQA webpages. Members of the public may still make requests using U.S. mail or email by using the Incident Report Request Form(s). Those requests will be manually entered and tracked in the Incident Report Request Portal by a member of CISU. An account on the Incident Report Request Portal can be created to track the request online.

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

To monitor the progress or update this request please log into the [SFPD Public Records Center](#).

---

**This is an auto-generated email and has originated from an unmonitored email account. Please DO NOT REPLY.**

---

**From:** [Great Deeds](#)  
**To:** [SOTF \(BOS\)](#)  
**Cc:** [Somera, Alisa \(BOS\)](#)  
**Subject:** Re: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075) - Last thing  
**Date:** Tuesday, September 30, 2025 2:50:30 PM  
**Attachments:** [image001.png](#)  
[image001.png](#)

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Dear Pat,

Thank you for acknowledging my complaint and providing the updated meeting schedule. I confirm my intent to be present for the Complaint Committee meeting on Tuesday, October 21, 2025.

To be clear, my position remains that the San Francisco Police Department (SFPD) is in violation of the California Public Records Act (CPRA) and the San Francisco Sunshine Ordinance for failing to provide a complete and unredacted disclosure of all records pertaining to the "Doodler" serial killer investigation.

While I appreciate the Task Force's procedural framework, the hearing on October 21st should not be a forum to debate the validity of my request. Rather, it should address the SFPD's ongoing failure to comply with state and local transparency laws. The purpose of this complaint is to compel the release of records that are, by law, already due to the public.

My request encompasses all documents, including but not limited to: investigative reports, chronological logs, witness statements, suspect profiles, forensic evidence logs, internal and external communications, memos, and any and all other materials related to this case from its inception to the present day.

Given that this is a historical cold case spanning five decades, any claims of exemption under the guise of an "ongoing investigation" are not credible and are significantly outweighed by the immense public interest in understanding the full scope of this investigation and its handling by law enforcement.

Therefore, I demand the immediate and complete release of these records prior to the October 21st meeting. I urge the Task Force to use its full authority to compel the SFPD to comply with the law without any further delay.

I look forward to the matter being agendized and resolved.

Sincerely,

Jared Stratton

On Tue, Sep 30, 2025, 2:43 PM SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)> wrote:

| Thank you for the confirmation, Mr. Stratton.



The October 1, 2025 meeting of the full Task Force has been rescheduled to October 15, 2025 in observance of Yom Kippur.

Complaints are scheduled initially before a committee of the Task Force where the case is reviewed for jurisdiction and merit. From there, the matter is referred to the full Task Force for a discussing and hearing. The next available opportunity for your matter to be heard is Tuesday, October 21, 2025 before the Complaint Committee; you will be notified if your matter is agendaized for that meeting.

Best,

Pat

---

**From:** Great Deeds <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

**Sent:** Tuesday, September 30, 2025 2:34 PM

**To:** SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)>

**Cc:** Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>

**Subject:** Re: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)

Yes that was the record request with the SFPD blanket denial response. I have included the original request in the text below and included a screenshot. Let me know if you need anymore information or if this is sufficient.

I see the October 1st meeting is canceled do you have a rescheduled date yet?


Thanks again,


Jared Stratton

[Skip to content](#)

# Public Records Portal

San Francisco Police Department





Jared Stratton

On Tue, Sep 30, 2025, 2:28 PM SOTF (BOS)  
<[sotf@sfgov.org](mailto:sotf@sfgov.org)> wrote:

Hello, Mr. Stratton –

## MENU

Select Language ▼

- 
- 

## Public Records Request

**Request Type:**

Public Records Request

**Description:**

Public records are defined as any writing containing information relating to the conduct of the public’s business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics.

**Contact E-Mail:**

[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

**Reference No:**

P225497-092825

**Status:**

Completed

**Describe the Record(s)  
Requested:**

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**Urgent Public Safety Interest:** The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a "strong person of interest" and, most critically, is believed to be "alive and living in the Bay Area". This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution.

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**Incident Number:** *if known*

**Police Officer(s) Involved:** *if known*

**Time of Incident:** *specify AM or PM, if known*

**Date Range From:** 01/01/1974  
*if applicable*

**Date Range To:** 01/01/2025  
*if applicable*

**Preferred Method to Receive Records:** Electronic via Records Center

☐ On 9/30/2025 12:29:16 PM, SANFRANCISCO PD Support wrote:

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**Body:**

September 30, 2025

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Thank you for your attention.

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Officer In Charge

Risk Management - Legal Division

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SFPDPatch





☐

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Thank you for your response to our request for supporting documents.

The Police Department's email [below] contains the text of your 9/28/2025 Public Records Act request in italics. Are we to consider that italicized text to be the documentation of your records request? Typically, we receive the initial request directly from the Petitioner so as to ensure its accuracy and the date that it was sent.

Best,

Pat

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

[1 Dr. Carlton B. Goodlett Place, Room 244](#)

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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**From:** Great Deeds <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>  
**Sent:** Tuesday, September 30, 2025 2:05 PM  
**To:** SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)>  
**Cc:** Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>  
**Subject:** Fwd: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)

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Jared Stratton

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

From: **SANFRANCISCO PD Support** <[sanfranciscopd@govqa.us](mailto:sanfranciscopd@govqa.us)>  
Date: Tue, Sep 30, 2025, 12:29 PM  
Subject: Public Records Request :: P225497-092825  
To: [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com) <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

--- Please respond above this line ---



September 30, 2025

Via email [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

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[5575 Greenridge Road](#)

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Lieutenant William Heppler #1726

Officer In Charge

Risk Management - Legal Division

---

To monitor the progress or update this request please log into the [SFPD Public Records Center](#).

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**This is an auto-generated email and has originated from an unmonitored email account.  
Please DO NOT REPLY.**

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**To:** [SOTF \(BOS\)](#)  
**Cc:** [Somera, Alisa \(BOS\)](#)  
**Subject:** Re: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)  
**Date:** Tuesday, October 7, 2025 9:21:34 PM  
**Attachments:** [image001.png](#)

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Read this and tell me what you think. I dont want to waste your time or taxpayers money.

However this argument is so legally sound it should compelle all of you to want to seek Justice and Transparency .

The San Francisco Police Department (SFPD) has relied upon California Government Code (Gov. Code) section 7923.600 as the basis for denying a request for public records. This statute codifies the exemption protecting law enforcement investigatory records under the California Public Records Act (CPRA). The analysis presented herein demonstrates that a denial based solely on citing Gov. Code § 7923.600 is fundamentally insufficient and legally vulnerable under the established jurisprudence of the CPRA and the specific transparency mandates of the San Francisco Administrative Code.

#### A. Initial Assessment of the SFPD Denial

Government Code § 7923.600, which protects records relating to complaints, investigations, intelligence information, or security procedures of state and local police agencies, serves as a specific permissive exemption. Crucially, its permissive nature—stating the division "does not require the disclosure" —means its invocation does not automatically justify withholding records.

The primary defect in the SFPD’s denial, which likely contributed to the failure of the previous challenge, rests upon the agency’s presumed neglect of two mandatory legal requirements:

**Failure to Apply the Mandatory Public Interest Balancing Test:** California law, codified in Gov. Code § 7922.000, mandates that any agency seeking to withhold a record must demonstrate, on the facts of the particular case, that the public interest served by non-disclosure clearly outweighs the public interest served by disclosure. The absence of an explicit, written balancing test constitutes a substantive violation of the CPRA.

**Failure to Meet San Francisco’s Specific Justification Mandate:** The SFPD operates under the stricter requirements of the San Francisco Sunshine Ordinance (S.F. Admin Code Chapter 67). Section 67.27(d) requires the agency to inform the requester of the nature and extent of the non-exempt information contained within the record and suggest alternative sources if most of the document is withheld. A boilerplate denial citing only the state statute is procedurally non-compliant under local law.

#### B. Strategic Pathway Recommendation

To successfully challenge the SFPD’s denial, a comprehensive, dual-track strategy must be adopted, focusing initially on procedural leverage before engaging the merits of the investigatory exemption:

Track 1: Procedural Challenge (Immediate Leverage): Assert the denial is procedurally defective for non-compliance with S.F. Admin Code § 67.27 and the segregability mandates implicit in the CPRA. This forces the SFPD to issue a new, compliant response, often leading to the release of redacted material.

Track 2: Substantive Challenge (Mandatory Override): Systematically argue that the SFPD has failed to meet the mandatory clearly outweighs threshold of Gov. Code § 7922.000, regardless of whether § 7923.600 nominally applies. The argument must define the compelling public interest in disclosure (e.g., accountability and oversight) and demonstrate that any harm caused by disclosure is speculative or insufficient to overcome the legal presumption of openness.

The recommended course of action is to file a detailed legal memorandum with the SFPD, demanding compliance, followed immediately by administrative appeals to the San Francisco Supervisor of Records and/or the Sunshine Ordinance Task Force (SOTF).

## II. Statutory Foundation of the Denial: Government Code § 7923.600

### A. The Text of the Investigatory Records Exemption

California Government Code § 7923.600 is the specific statutory provision relied upon by the SFPD. The statute is explicit in its language regarding law enforcement records:

(a) Except as provided in Sections 7924.510, 7924.700, and 7929.610, this division does not require the disclosure of records of complaints to, or investigations conducted by, or records of intelligence information or security procedures of, the office of the Attorney General and the Department of Justice, the Office of Emergency Services and any state or local police agency, or any investigatory or security files compiled by any other state or local police agency, or any investigatory or security files compiled by any other state or local agency for correctional, law enforcement, or licensing purposes.

The scope of this exemption is broad, encompassing not only state-level entities like the Attorney General's Office and the Department of Justice, but specifically "any state or local police agency". This provision allows the SFPD to potentially withhold records falling into several categories: complaints received, active or completed investigation files, intelligence data, or documentation of security procedures. The express inclusion of exceptions, such as those pertaining to environmental information and trade secrets (§§ 7924.510, 7924.700), illustrates that the legislature intended for detailed balancing even within the exempt categories.

### B. Historical Context and Legislative Intent

Gov. Code § 7923.600 is a recent recodification of the former Gov. Code § 6254, subdivision (f). This means that the long history of judicial review applied to the former statute remains the controlling authority for interpreting the application of § 7923.600 today. The recodification, effective January 1, 2023, did not change the substantive meaning or operation of the investigatory files exemption. Understanding this lineage is essential, as the prevailing judicial standards for determining what constitutes an "investigation" flow directly from precedents established under the prior code structure.

### C. Judicial Interpretation of "Investigations Conducted By"

The critical ambiguity often exploited by law enforcement agencies is the definition of "investigations conducted by." The seminal California Supreme Court case addressing this

issue is *Haynie v. Superior Court* (2001).

In *Haynie*, the court adopted a broad interpretation, holding that the exemption applies to records related to a specific incident where enforcement is "reasonably contemplated as a possibility," even if the interaction did not result in an immediate arrest or citation. The specific facts in *Haynie* involved a brief traffic stop, a search, and questioning by a deputy, yet the records documenting this event were deemed investigatory and potentially exempt. This standard allows agencies like the SFPD to justify withholding records generated during routine police contact, provided the records were compiled for potential enforcement.

Conversely, the application of this exemption is generally viewed as discretionary. For older, closed cases, the analysis often shifts, as records pertaining to investigations unrelated to any contemporaneous law enforcement activities are not required to be disclosed, but the statute permits withholding if they retain law enforcement utility. If the record pertains to a genuinely cold or closed case, the original justification for secrecy—protecting the integrity of the investigation—diminishes, paving the way for the mandatory balancing test to compel release.

### III. Judicial Limitations and Strategic Counterpoints to Categorical Denial

While *Haynie* established a broad standard for what constitutes an investigation, subsequent judicial scrutiny, particularly in the context of modern digital records, has placed significant limitations on an agency's ability to employ blanket, categorical denials under Gov. Code § 7923.600.

#### A. Challenging the Categorical Application (The Castañares Rule)

Recent appellate court decisions have signaled a clear trend toward stricter scrutiny of agency denials, especially where agencies attempt to classify entire categories of records as automatically exempt based merely on the source or type of technology used. This judicial development erodes the concept of categorical immunity that the SFPD often assumes when citing § 7923.600.

In the 2023 case *Castañares v. Superior Court*, the Fourth District Court of Appeal held that police drone footage is not automatically exempt under § 7923.600. This decision clarified that the application of the investigatory exemption depends on the purpose for which the record was generated and maintained. The records must be demonstrably linked to an actual criminal or correctional investigation, rather than simply being artifacts of routine police operations.

The strategic implication of the *Castañares* rule is profound: any SFPD denial that attempts to claim that all records generated during a police interaction (e.g., body camera videos, administrative logs, internal communication about resource deployment) are automatically covered by the investigatory exemption is vulnerable. The argument must insist that the SFPD prove that the record was compiled primarily for a specific, imminent criminal or correctional purpose, forcing an item-by-item justification, rather than accepting a generalized claim that the documents relate to an "incident."

#### B. Distinguishing Between Routine Operational Records and True Investigatory Files

The strategic counter-argument must rigorously distinguish between essential investigative documentation (e.g., active witness interviews, evidence logs) and records generated as a byproduct of routine police administration. Records used primarily for administrative tracking, statistical analysis, fleet management, internal review, or non-evidentiary recording of a scene

often do not fall squarely within the purpose of shielding investigatory materials. If the SFPD is withholding documentation that serves multiple purposes, the agency must demonstrate that the dominant purpose is genuine law enforcement investigation, as defined by precedent.

### C. The Mandate for Severability and Redaction

Even in cases where a record does contain genuinely exempt investigatory material (e.g., active witness identities or investigative leads), the SFPD retains a mandatory duty to redact and disclose all non-exempt, segregable portions of the record. A blanket denial citing § 7923.600 implies a failure to conduct this segregability review. This fundamental obligation is reinforced both by the CPRA generally and by the specificity requirements of the San Francisco Sunshine Ordinance (S.F. Admin Code § 67.27(d)). If non-exempt information can be reasonably separated from exempt information—such as administrative dates, general policy applications, or unedited footage that does not reveal intelligence—the SFPD is obligated to release it. The failure to demonstrate this good-faith effort constitutes a procedural violation independent of the merits of the exemption claim.

## IV. The Mandatory Public Interest Override: Government Code § 7922.000

The most decisive flaw in a standard law enforcement denial under the CPRA is often the failure to address, or correctly apply, the mandatory balancing test codified in Government Code § 7922.000. This section provides a mandatory override, meaning that even if the record falls under the specific permissive exemption of § 7923.600, it still must be disclosed unless the agency meets a high burden of proof.

### A. Statutory Supremacy and Judicial Mandate

Government Code § 7922.000 (formerly Gov. Code § 6255) establishes the general exception test:

An agency shall justify withholding any record by demonstrating that the record in question is exempt under express provisions of this division, or that on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.

The statutory relationship between § 7923.600 and § 7922.000 is hierarchical. Since § 7923.600 is merely discretionary ("does not require disclosure"), the SFPD must nonetheless meet the mandatory requirement ("An agency shall justify withholding...") of § 7922.000. This means the agency cannot simply cite the investigatory nature of the record; it must proactively prove that keeping the record secret provides a greater public benefit than releasing it.

The legal threshold is deliberately set high: the interest in non-disclosure must clearly outweigh the public interest in disclosure. This is not an equal balancing test; it establishes a strong legal presumption in favor of transparency. The failure of the SFPD to articulate this mandatory balancing test in its initial denial, which is a common agency deficiency, renders the denial immediately susceptible to challenge.

### B. Constructing the Public Interest Argument (Disclosure)

The strategic rewrite must articulate a compelling public interest in disclosure that is specifically tied to the public's fundamental right of access to information concerning the conduct of public business. Disclosure arguments should center on:

Governmental Accountability: The public interest in accessing these records stems from the

need to ensure oversight of law enforcement activities, policy compliance, and the ethical conduct of public employees.

Evaluating Policy and Procedure: Records regarding complaints, investigations, or specific security procedures—even if nominally investigatory—often provide crucial insight into the agency’s internal protocols and decision-making processes, which is vital for informed public discourse.

Community Trust and Oversight: For records concerning sensitive interactions or use of force, disclosure serves the overarching public interest in promoting trust between the SFPD and the communities it serves, particularly where historical context indicates a need for increased police accountability.

#### C. Deconstructing the Public Interest Argument (Nondisclosure)

The SFPD’s justification for nondisclosure must be aggressively challenged. Law enforcement agencies typically rely on generalized harms such as jeopardizing future investigations, compromising intelligence sources, or protecting the safety of officers or witnesses.

It is critical to remember that the balancing test strictly weighs only public interests—the public interest in disclosure versus the public interest in non-disclosure. Agency interests (e.g., avoiding legal liability, minimizing administrative burden) or the private litigation interests of the requester are irrelevant to this statutory calculus.

If the matter documented by the record is concluded, or if the investigation is determined to be cold or dormant, the public interest in preserving investigative secrecy is significantly diminished, making it difficult for the SFPD to argue that secrecy "clearly outweighs" the public benefit of transparency. The SFPD must demonstrate that the harm is concrete and substantial, not merely speculative or based on generalized fear of scrutiny.

#### V. Review of SFPD Compliance and Critique of the Previous Argument

##### A. The Unique Demands of the San Francisco Sunshine Ordinance

Law enforcement agencies operating within the City and County of San Francisco are subject to legal requirements that exceed the minimum standards established by the state CPRA. The San Francisco Sunshine Ordinance (S.F. Administrative Code Chapter 67) imposes heightened duties for disclosure and justification.

Specifically, S.F. Administrative Code § 67.27 mandates strict requirements for justifying any withholding of information. A denial must:

Cite the specific permissive exemption in the CPRA being asserted (e.g., § 7923.600) [6].

Provide specific statutory authority if disclosure is prohibited by law [7].

Crucially, Section 67.27(d) requires that when a record contains mostly exempt information, the custodian shall inform the requester of the nature and extent of the nonexempt information and suggest alternative sources.

This procedural mandate provides a powerful source of leverage. A simple, one-sentence denial citing Gov. Code § 7923.600 without addressing the presence of non-exempt material or the segregation duty, is procedurally defective under local San Francisco law. This



procedural vulnerability allows the administrative appeals process (Supervisor of Records or SOTF) to compel a new, compliant response without having to immediately delve into the difficult merits of the investigatory exemption itself.

#### B. Critique of the Previous Argument

The failure of the previous attempt to secure the records, cited in the user query, can be attributed to several likely strategic deficiencies that the rewrite must correct:

**Oversimplification of the Exemption:** The prior argument likely treated § 7923.600 as a point of categorical dispute (i.e., whether the record was investigatory or not), rather than treating it as a permissive threshold that is subordinate to the mandatory public interest balancing test of § 7922.000. By focusing only on the applicability of the exemption, the argument conceded the high ground of the mandatory override.

**Lack of Specific Public Interest Framing:** If the original request failed to articulate a compelling, specific public interest that demonstrably overcomes the state's general interest in police secrecy, it could not satisfy the clearly outweighs standard required by § 7922.000. Agency denials routinely prevail when the requester's interest is framed as merely a private legal pursuit, instead of a broad public good (e.g., police accountability).

**Neglect of Local Procedural Mandates:** The most significant oversight was likely the failure to aggressively invoke the non-compliance issues stemming from S.F. Admin Code § 67.27. In San Francisco, challenging a denial based on procedural failure to segregate and specify non-exempt content is often the most direct path to obtaining relief or forcing a detailed re-evaluation.

#### VI. Strategic Rewrite: A Dual-Track Challenge to the SFPD Denial

The following framework presents the strategic components for a persuasive legal memorandum designed to challenge the SFPD's denial, incorporating the hierarchy of state and local legal requirements.

##### A. Track 1: Rebutting the Factual Claim and Demanding Segregability (Challenging § 7923.600)

The revised argument must initiate a narrow challenge to the SFPD's broad application of Government Code § 7923.600 by asserting that the records sought do not satisfy the required primary purpose test.

The records requested must be classified as routine documentation of operational activities, administrative logging, or internal procedural communications, which were not compiled primarily for the purpose of a specific, foreseeable criminal prosecution. This distinction is supported by appellate authority which rejects the categorical inclusion of all police-generated records under the investigatory exemption.

Even if the records are deemed partially exempt, the SFPD has issued a denial that violates its duty of segregability. The response fails to identify the nature and extent of the non-exempt information, nor does it demonstrate a good-faith effort to redact and release segregable portions. This failure violates the fundamental disclosure principle of the CPRA and constitutes a direct procedural violation of S.F. Admin Code § 67.27(d). A full, unredacted denial based on an assumption of blanket exemption cannot stand.

## B. Track 2: Asserting the Mandatory Public Interest Override (Compelling § 7922.000 Balancing)

The core legal demand must be for the SFPD to comply with Government Code § 7922.000, which requires explicit, case-specific justification for non-disclosure.

The argument must state unequivocally that the SFPD has violated its statutory obligation by failing to articulate how the public interest served by non-disclosure clearly outweighs the defined public interest in disclosure. This is not an optional analysis; it is a mandatory prerequisite for using any permissive exemption.

The memorandum must then rigorously define the specific, compelling public interest served by disclosure, focusing on the need for effective democratic oversight of the SFPD, evaluation of training and resource deployment, and verification of official conduct. If the records are related to an inactive investigation, the argument must emphasize that the public interest in maintaining secrecy is severely diluted, while the public interest in police accountability remains paramount. Any claimed harm by the SFPD (e.g., speculative compromise of future methods) must be characterized as generalized or conjectural, insufficient to meet the "clearly outweighs" threshold favoring transparency.

## C. Procedural Enforcement (Invoking S.F. Admin Code § 67.27)

The procedural deficiency under local law provides the strongest initial basis for reversal. The memorandum must formally request that the SFPD acknowledge the denial is procedurally defective under S.F. Admin Code § 67.27(d) for failing to specify the non-exempt content.

This provides a clear pathway for administrative appeal to the San Francisco Supervisor of Records or the Sunshine Ordinance Task Force (SOTF). Administrative findings of procedural non-compliance can efficiently compel the SFPD to return to the request, perform the necessary segregation, and conduct the mandatory § 7922.000 balancing test, creating a comprehensive record for any subsequent judicial review in San Francisco Superior Court.

## VII. Synthesis of Key Legal Relationships and Conclusions

A successful challenge to the SFPD's denial requires navigating the complex interplay between specific state exemptions, the mandatory state override test, and heightened local procedural standards. The SFPD cannot rely solely on the permissive language of Government Code § 7923.600. It must justify its decision against the mandatory, pro-disclosure framework established by state and local law.

### A. CPRA Statutory Comparison and Application to SFPD

The following table synthesizes the relationship between the key CPRA statutes relevant to the SFPD denial and outlines the appropriate legal counterpoints.

#### CPRA Statutory Comparison and Application to SFPD

Government Code Section	Former Statute	Exemption Type	SFPD Implication	Strategic Counterpoint
§ 7923.600				
§ 6254(f)				

#### Specific Permissive

Primary citation for withholding law enforcement investigatory records and complaints.

Requires case-specific analysis (Castañares) and is subject to the mandatory balancing test.

§ 7922.000 § 6255 Mandatory Balancing Test (Override)

Forces agency to justify withholding by proving public harm clearly outweighs public benefit of disclosure.

Failure to explicitly perform and document this test is grounds for violation.

§ 7922.54(a) N/A Procedural Requirement

Mandates a written response for denial.

The written denial must be factually specific, articulate the balancing test, and comply with local law (§ 67.27).

§ 7927.700 § 6254(c) Specific Permissive

Exempts personnel files constituting an unwarranted invasion of privacy.

If invoked alongside § 7923.600, it requires a separate, demonstrable balancing of privacy vs. public interest.

B. San Francisco Administrative Code § 67.27 Compliance Audit

The local ordinance provides immediate, compelling grounds for relief based on procedural non-compliance. The SFPD must adhere to these enhanced transparency rules.

S.F. Administrative Code § 67.27 Compliance Audit

S.F. Admin Code § 67.27 Requirement SFPD Obligation for Denial Challenge Point

(a) Citing Specific Permissive Exemption

Must cite 7923.600 as the specific permissive authority asserted.

The SFPD must confirm its understanding that the exemption is permissive, not a mandatory prohibition against disclosure.

(d) Informing on Nonexempt Content

Must inform the requester of the nature and extent of nonexempt information and suggest alternative sources.

The SFPD's blanket denial violated this mandate by failing to conduct and report on the segregation of responsive records.

C. Conclusions and Recommendations

The SFPD's denial, based solely on Government Code § 7923.600, presents a strong case for successful administrative and potential judicial challenge due to critical statutory and procedural omissions.

Mandatory Recourse to Local Appeals: The SFPD's denial is highly likely to be procedurally defective under S.F. Admin Code § 67.27(d). The primary action should be an immediate appeal to the Sunshine Ordinance Task Force (SOTF) or the Supervisor of Records to secure a ruling on this procedural deficiency, compelling the SFPD to re-evaluate the request under the required segregation and specificity standards.

Substantive Burden Shift: The central legal argument must pivot the burden of proof entirely

onto the SFPD. The agency must be forced to articulate, in detail, how the public interest in maintaining secrecy clearly outweighs the public interest in oversight and accountability, as required by Gov. Code § 7922.000. Failure to provide such a rigorous, documented balancing test is a clear violation of state law.

Reframing the Records: The challenge must leverage evolving case law, such as the principles established in *Castañares*, to argue that the records sought are routine operational documents or administrative files rather than pure investigatory files compiled for prosecution, thereby narrowing the scope of the § 7923.600 exemption.

By executing this multi-layered strategic challenge, the requester can overcome the generalized claim of the investigatory exemption and compel the SFPD to either release the records or provide a legally sufficient, detailed, and compliant justification for withholding, thereby enhancing public transparency and holding the local agency accountable to both state and municipal law.

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A GUIDE TO THE CALIFORNIA PUBLIC RECORDS ACT

Thoughts

Jared Stratton

On Tue, Sep 30, 2025, 2:28 PM SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)> wrote:

|

Hello, Mr. Stratton –

Thank you for your response to our request for supporting documents.

The Police Department's email [below] contains the text of your 9/28/2025 Public Records Act request in italics. Are we to consider that italicized text to be the documentation of your records request? Typically, we receive the initial request directly from the Petitioner so as to ensure its accuracy and the date that it was sent.

Best,

Pat

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

[1 Dr. Carlton B. Goodlett Place, Room 244](#)

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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**From:** Great Deeds <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>  
**Sent:** Tuesday, September 30, 2025 2:05 PM  
**To:** SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)>  
**Cc:** Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>  
**Subject:** Fwd: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Jared Stratton

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

From: **SANFRANCISCOPD Support** <[sanfranciscopd@govqa.us](mailto:sanfranciscopd@govqa.us)>  
Date: Tue, Sep 30, 2025, 12:29 PM  
Subject: Public Records Request :: P225497-092825  
To: [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com) <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

--- Please respond above this line ---



September 30, 2025

Via email [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

Jared Stratton

[5575 Greenridge Road](#)

[Castro Valley, CA 94552](#)

RE: Public Records Request, dated September 28, 2025, Reference # P225497-092825

Dear Jared Stratton:

The San Francisco Police Department (SFPD) received your Public Records Act request, dated September 28, 2025, on September 30, 2025.

You requested, "*Dear Lieutenant Heppler,*

*This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975.*

*Our request is grounded in the California Constitution, which establishes that access to government information is a "fundamental and necessary right of every person in this state" (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. Your department's blanket denial, based on a single statutory citation, fails to meet the legal burden of providing a specific, factual justification for withholding records of immense public importance.*

*While we acknowledge the investigatory files exemption under § 7923.600 and the precedent set by Williams v. Superior Court (1993) 5 Cal.4th 337, a mechanical*

*application of this exemption to a nearly 50-year-old case is unreasonable and contrary to the public interest. The original justifications for this exemption—to protect witness safety, prevent the destruction of evidence, and shield investigative techniques—have been eroded to the point of nonexistence by the passage of five decades. To claim that this file remains exempt simply by labeling the case as perpetually "open" creates a legal fiction that would shield the SFPD from all public accountability for its handling of one of San Francisco's most notorious unsolved serial murder cases.*

*Even if the file technically falls within the exemption, the CPRA's public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy.*

*Urgent Public Safety Interest: The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a "strong person of interest" and, most critically, is believed to be "alive and living in the Bay Area". This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution.*

*Government Accountability: The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-generational failure of the justice system. The public has a right to scrutinize the SFPD's original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department's contemporary handling of the case and understand the specific evidentiary or procedural hurdles that prevent an arrest today.*

*Waiver of Secrecy by Public Solicitation: The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to solicit assistance in this very case. This includes:*

*Holding multiple press conferences to release details of the investigation.*

*Publishing a 1975 forensic sketch of the suspect alongside a modern, age-progressed rendering.*

*Releasing audio from a 1974 911 call related to the discovery of a victim's body.*

*Increasing a public reward for information to \$250,000.*

*It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case.*

*Finally, your blanket denial violates the CPRA's mandatory duty to segregate and redact. Cal. Govt. Code § 7922.525(b) requires that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law." A wholesale refusal to release any part of the file is a clear violation of this statute.*

*Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. In the alternative, should you maintain that specific portions of the file are lawfully exempt, we demand that you produce the entire file with only those specific portions redacted, accompanied by a detailed index justifying each redaction under law.*

*Please be advised that if you fail to provide the requested records within the statutory timeframe, we will consider this a final denial. We will then pursue all available legal remedies, including filing a petition with the San Francisco Supervisor of Records under the San Francisco Sunshine Ordinance (S.F. Administrative Code § 67.21(d)) and initiating litigation to compel disclosure under the CPRA.*

*We expect a prompt and substantive response.*

*Sincerely,*

*Jared Stratton"*

Generally, SFPD declines to release records to an open investigation under California Government Code Section 7923.600, which exempts from disclosure records of complaints to, investigations conducted by, intelligence information or security procedures of, and investigatory or security files compiled by local police agencies. As such, we are unable to provide you with the information you seek, as disclosure of information may endanger successful completion of the investigation.

Thank you for your attention.

Sincerely,

Lieutenant William Heppler #1726

Officer In Charge

Risk Management - Legal Division

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To monitor the progress or update this request please log into the [SFPD Public Records Center](#).

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**From:** [Great Deeds](#)  
**To:** [SOTF \(BOS\)](#)  
**Subject:** Subject: Formal Submission of Legal Memorandum for File 25075 – Challenge to SFPD Denial (Doodler Homicide Files)  
**Date:** Wednesday, October 8, 2025 11:22:32 AM  
**Attachments:** [image001.png](#)  
[image001.png](#)

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Dear Sunshine Ordinance Task Force Complaint Committee,

Thank you for the notification regarding the tentative hearing date of October 21, 2025, for File 25075. We acknowledge the scheduling and appreciate the Committee's commitment to reviewing this matter.

To facilitate an efficient and thorough review of jurisdiction and merit ahead of the hearing, we are hereby formally submitting our comprehensive legal memorandum, \*\*\*Expert Legal Analysis and Strategic Challenge to SFPD Denial Under California Government Code § 7923.600,\*\*\* for your immediate consideration.

This memorandum establishes that the San Francisco Police Department's denial is legally insufficient on two primary, mandatory grounds:

1. \*\*Violation of State Law (Government Code § 7922.000):\*\* The SFPD's reliance solely on the permissive investigatory exemption (Gov. Code 7923.600) fails to satisfy the mandatory "catch-all" public interest balancing test (Gov. Code 7922.000).[1, 2] The agency is legally obligated to demonstrate that the public interest served by not disclosing the records \*\*clearly outweighs\*\* the compelling public interest in accountability and oversight regarding this historical serial homicide case. The denial provides no such justification.
2. \*\*Violation of Local Mandates (S.F. Admin Code § 67.27(d)):\*\* The SFPD's blanket refusal constitutes a procedural violation of the San Francisco Sunshine Ordinance, which requires the agency to articulate the nature and extent of any non-exempt, segregable information within the files.[3] The failure to segment the historical 1970s documents from any genuinely current investigative leads is procedurally defective under local law.

We respectfully request that the Complaint Committee members review this detailed legal submission prior to the hearing. We look forward to presenting these findings on October 21, 2025, and obtaining an Order of Determination compelling the SFPD to comply with both state and local disclosure mandates.

Let's be transparent. We need justice for the victim's. SFPD has made this a public issue. It doesn't matter that it will embarrass them.

The dept at the time was very bigoted towards gay men. The report likely contains slurs and a lack of engagement, even when the knew who the suspect was.

If denied this will go viral and every gay person on the planet will see it.

Do the right thing please



Sincerely,

Jared Stratton

On Wed, Oct 8, 2025, 10:16 AM SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)> wrote:

Good Morning, Mr. Stratton –

The Sunshine Ordinance Task Force (Task Force) has received your communication regarding the insufficiency of the San Francisco Police Department's invocation of California Government Code (Gov. Code) section 7923.600 as the basis for denying a request for public records.

Your desire to address the matter expeditiously is appreciated. The discourse that you propose, however, must await an open and public meeting to hear **File 25075**. The matter is tentatively scheduled before the Complaint Committee on 10/21/2025 for a review of jurisdiction and merit, and your will receive formal notification shortly.

Thank you.

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

[1 Dr. Carlton B. Goodlett Place, Room 244](#)

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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*to provide personal identifying information when they communicate with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

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**From:** Great Deeds <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

**Sent:** Tuesday, October 7, 2025 9:21 PM

**To:** SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)>

**Cc:** Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>

**Subject:** Re: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)

Read this and tell me what you think. I dont want to waste your time or taxpayers money.

However this argument is so legally sound it should compelle all of you to want to seek Justice and Transparency .

The San Francisco Police Department (SFPD) has relied upon California Government Code (Gov. Code) section 7923.600 as the basis for denying a request for public records. This statute codifies the exemption protecting law enforcement investigatory records under the California Public Records Act (CPRA). The analysis presented herein demonstrates that a denial based solely on citing Gov. Code § 7923.600 is fundamentally insufficient and legally vulnerable under the established jurisprudence of the CPRA and the specific transparency mandates of the San Francisco Administrative Code.

#### A. Initial Assessment of the SFPD Denial

Government Code § 7923.600, which protects records relating to complaints, investigations, intelligence information, or security procedures of state and local police agencies, serves as a specific permissive exemption. Crucially, its permissive nature—stating the division "does not require the disclosure" —means its invocation does not automatically justify withholding records.

The primary defect in the SFPD's denial, which likely contributed to the failure of the previous challenge, rests upon the agency's presumed neglect of two mandatory legal requirements:

**Failure to Apply the Mandatory Public Interest Balancing Test:** California law, codified in Gov. Code § 7922.000, mandates that any agency seeking to withhold a record must demonstrate, on the facts of the particular case, that the public interest served by non-disclosure clearly outweighs the public interest served by disclosure. The absence of an explicit, written balancing test constitutes a substantive violation of the CPRA.

**Failure to Meet San Francisco's Specific Justification Mandate:** The SFPD operates under the stricter requirements of the San Francisco Sunshine Ordinance (S.F. Admin Code Chapter 67). Section 67.27(d) requires the agency to inform the requester of the nature and extent of the non-exempt information contained within the record and suggest alternative sources if most of the document is withheld. A boilerplate denial citing only the state statute is procedurally non-compliant under local law.

## B. Strategic Pathway Recommendation

To successfully challenge the SFPD's denial, a comprehensive, dual-track strategy must be adopted, focusing initially on procedural leverage before engaging the merits of the investigatory exemption:

**Track 1: Procedural Challenge (Immediate Leverage):** Assert the denial is procedurally defective for non-compliance with S.F. Admin Code § 67.27 and the segregability mandates implicit in the CPRA. This forces the SFPD to issue a new, compliant response, often leading to the release of redacted material.

**Track 2: Substantive Challenge (Mandatory Override):** Systematically argue that the SFPD has failed to meet the mandatory clearly outweighs threshold of Gov. Code § 7922.000, regardless of whether § 7923.600 nominally applies. The argument must define the compelling public interest in disclosure (e.g., accountability and oversight) and demonstrate that any harm caused by disclosure is speculative or insufficient to overcome the legal presumption of openness.

The recommended course of action is to file a detailed legal memorandum with the SFPD, demanding compliance, followed immediately by administrative appeals to the San

Francisco Supervisor of Records and/or the Sunshine Ordinance Task Force (SOTF).

## II. Statutory Foundation of the Denial: Government Code § 7923.600

### A. The Text of the Investigatory Records Exemption

California Government Code § 7923.600 is the specific statutory provision relied upon by the SFPD. The statute is explicit in its language regarding law enforcement records:

(a) Except as provided in Sections 7924.510, 7924.700, and 7929.610, this division does not require the disclosure of records of complaints to, or investigations conducted by, or records of intelligence information or security procedures of, the office of the Attorney General and the Department of Justice, the Office of Emergency Services and any state or local police agency, or any investigatory or security files compiled by any other state or local police agency, or any investigatory or security files compiled by any other state or local agency for correctional, law enforcement, or licensing purposes.

The scope of this exemption is broad, encompassing not only state-level entities like the Attorney General's Office and the Department of Justice, but specifically "any state or local police agency". This provision allows the SFPD to potentially withhold records falling into several categories: complaints received, active or completed investigation files, intelligence data, or documentation of security procedures. The express inclusion of exceptions, such as those pertaining to environmental information and trade secrets (§§ 7924.510, 7924.700), illustrates that the legislature intended for detailed balancing even within the exempt categories.

### B. Historical Context and Legislative Intent

Gov. Code § 7923.600 is a recent recodification of the former Gov. Code § 6254, subdivision (f). This means that the long history of judicial review applied to the former statute remains the controlling authority for interpreting the application of § 7923.600 today. The recodification, effective January 1, 2023, did not change the substantive meaning or operation of the investigatory files exemption. Understanding this lineage is essential, as the prevailing judicial standards for determining what constitutes an "investigation" flow directly from precedents established under the prior code structure.

### C. Judicial Interpretation of "Investigations Conducted By"

The critical ambiguity often exploited by law enforcement agencies is the definition of "investigations conducted by." The seminal California Supreme Court case addressing this issue is *Haynie v. Superior Court* (2001).

In Haynie, the court adopted a broad interpretation, holding that the exemption applies to records related to a specific incident where enforcement is "reasonably contemplated as a possibility," even if the interaction did not result in an immediate arrest or citation. The specific facts in Haynie involved a brief traffic stop, a search, and questioning by a deputy, yet the records documenting this event were deemed investigatory and potentially exempt. This standard allows agencies like the SFPD to justify withholding records generated during routine police contact, provided the records were compiled for potential enforcement.

Conversely, the application of this exemption is generally viewed as discretionary. For older, closed cases, the analysis often shifts, as records pertaining to investigations unrelated to any contemporaneous law enforcement activities are not required to be disclosed, but the statute permits withholding if they retain law enforcement utility. If the record pertains to a genuinely cold or closed case, the original justification for secrecy—protecting the integrity of the investigation—diminishes, paving the way for the mandatory balancing test to compel release.

### III. Judicial Limitations and Strategic Counterpoints to Categorical Denial

While Haynie established a broad standard for what constitutes an investigation, subsequent judicial scrutiny, particularly in the context of modern digital records, has placed significant limitations on an agency's ability to employ blanket, categorical denials under Gov. Code § 7923.600.

#### A. Challenging the Categorical Application (The Castañares Rule)

Recent appellate court decisions have signaled a clear trend toward stricter scrutiny of agency denials, especially where agencies attempt to classify entire categories of records as automatically exempt based merely on the source or type of technology used. This judicial development erodes the concept of categorical immunity that the SFPD often assumes when citing § 7923.600.

In the 2023 case *Castañares v. Superior Court*, the Fourth District Court of Appeal held that police drone footage is not automatically exempt under § 7923.600. This decision clarified that the application of the investigatory exemption depends on the purpose for which the record was generated and maintained. The records must be demonstrably linked to an actual criminal or correctional investigation, rather than simply being artifacts of routine police operations.

The strategic implication of the Castañares rule is profound: any SFPD denial that attempts to claim that all records generated during a police interaction (e.g., body camera videos,

administrative logs, internal communication about resource deployment) are automatically covered by the investigatory exemption is vulnerable. The argument must insist that the SFPD prove that the record was compiled primarily for a specific, imminent criminal or correctional purpose, forcing an item-by-item justification, rather than accepting a generalized claim that the documents relate to an "incident."

#### B. Distinguishing Between Routine Operational Records and True Investigatory Files

The strategic counter-argument must rigorously distinguish between essential investigative documentation (e.g., active witness interviews, evidence logs) and records generated as a byproduct of routine police administration. Records used primarily for administrative tracking, statistical analysis, fleet management, internal review, or non-evidentiary recording of a scene often do not fall squarely within the purpose of shielding investigatory materials. If the SFPD is withholding documentation that serves multiple purposes, the agency must demonstrate that the dominant purpose is genuine law enforcement investigation, as defined by precedent.

#### C. The Mandate for Severability and Redaction

Even in cases where a record does contain genuinely exempt investigatory material (e.g., active witness identities or investigative leads), the SFPD retains a mandatory duty to redact and disclose all non-exempt, segregable portions of the record. A blanket denial citing § 7923.600 implies a failure to conduct this segregability review. This fundamental obligation is reinforced both by the CPRA generally and by the specificity requirements of the San Francisco Sunshine Ordinance (S.F. Admin Code § 67.27(d)). If non-exempt information can be reasonably separated from exempt information—such as administrative dates, general policy applications, or unedited footage that does not reveal intelligence—the SFPD is obligated to release it. The failure to demonstrate this good-faith effort constitutes a procedural violation independent of the merits of the exemption claim.

### IV. The Mandatory Public Interest Override: Government Code § 7922.000

The most decisive flaw in a standard law enforcement denial under the CPRA is often the failure to address, or correctly apply, the mandatory balancing test codified in Government Code § 7922.000. This section provides a mandatory override, meaning that even if the record falls under the specific permissive exemption of § 7923.600, it still must be disclosed unless the agency meets a high burden of proof.

#### A. Statutory Supremacy and Judicial Mandate

Government Code § 7922.000 (formerly Gov. Code § 6255) establishes the general exception test:

An agency shall justify withholding any record by demonstrating that the record in question is exempt under express provisions of this division, or that on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.

The statutory relationship between § 7923.600 and § 7922.000 is hierarchical. Since § 7923.600 is merely discretionary ("does not require disclosure"), the SFPD must nonetheless meet the mandatory requirement ("An agency shall justify withholding...") of § 7922.000. This means the agency cannot simply cite the investigatory nature of the record; it must proactively prove that keeping the record secret provides a greater public benefit than releasing it.

The legal threshold is deliberately set high: the interest in non-disclosure must clearly outweigh the public interest in disclosure. This is not an equal balancing test; it establishes a strong legal presumption in favor of transparency. The failure of the SFPD to articulate this mandatory balancing test in its initial denial, which is a common agency deficiency, renders the denial immediately susceptible to challenge.

#### B. Constructing the Public Interest Argument (Disclosure)

The strategic rewrite must articulate a compelling public interest in disclosure that is specifically tied to the public's fundamental right of access to information concerning the conduct of public business. Disclosure arguments should center on:

**Governmental Accountability:** The public interest in accessing these records stems from the need to ensure oversight of law enforcement activities, policy compliance, and the ethical conduct of public employees.

**Evaluating Policy and Procedure:** Records regarding complaints, investigations, or specific security procedures—even if nominally investigatory—often provide crucial insight into the agency's internal protocols and decision-making processes, which is vital for informed public discourse.

**Community Trust and Oversight:** For records concerning sensitive interactions or use of force, disclosure serves the overarching public interest in promoting trust between the SFPD and the communities it serves, particularly where historical context indicates a need for increased police accountability.



### C. Deconstructing the Public Interest Argument (Nondisclosure)

The SFPD's justification for nondisclosure must be aggressively challenged. Law enforcement agencies typically rely on generalized harms such as jeopardizing future investigations, compromising intelligence sources, or protecting the safety of officers or witnesses.

It is critical to remember that the balancing test strictly weighs only public interests—the public interest in disclosure versus the public interest in non-disclosure. Agency interests (e.g., avoiding legal liability, minimizing administrative burden) or the private litigation interests of the requester are irrelevant to this statutory calculus.

If the matter documented by the record is concluded, or if the investigation is determined to be cold or dormant, the public interest in preserving investigative secrecy is significantly diminished, making it difficult for the SFPD to argue that secrecy "clearly outweighs" the public benefit of transparency. The SFPD must demonstrate that the harm is concrete and substantial, not merely speculative or based on generalized fear of scrutiny.

### V. Review of SFPD Compliance and Critique of the Previous Argument

#### A. The Unique Demands of the San Francisco Sunshine Ordinance

Law enforcement agencies operating within the City and County of San Francisco are subject to legal requirements that exceed the minimum standards established by the state CPRA. The San Francisco Sunshine Ordinance (S.F. Administrative Code Chapter 67) imposes heightened duties for disclosure and justification.

Specifically, S.F. Administrative Code § 67.27 mandates strict requirements for justifying any withholding of information. A denial must:

Cite the specific permissive exemption in the CPRA being asserted (e.g., § 7923.600) [6].

Provide specific statutory authority if disclosure is prohibited by law [].

Crucially, Section 67.27(d) requires that when a record contains mostly exempt information, the custodian shall inform the requester of the nature and extent of the nonexempt information and suggest alternative sources.

This procedural mandate provides a powerful source of leverage. A simple, one-sentence denial citing Gov. Code § 7923.600 without addressing the presence of non-exempt material or the segregation duty, is procedurally defective under local San Francisco law. This procedural vulnerability allows the administrative appeals process (Supervisor of Records or SOTF) to compel a new, compliant response without having to immediately delve into the difficult merits of the investigatory exemption itself.

## B. Critique of the Previous Argument

The failure of the previous attempt to secure the records, cited in the user query, can be attributed to several likely strategic deficiencies that the rewrite must correct:

**Oversimplification of the Exemption:** The prior argument likely treated § 7923.600 as a point of categorical dispute (i.e., whether the record was investigatory or not), rather than treating it as a permissive threshold that is subordinate to the mandatory public interest balancing test of § 7922.000. By focusing only on the applicability of the exemption, the argument conceded the high ground of the mandatory override.

**Lack of Specific Public Interest Framing:** If the original request failed to articulate a compelling, specific public interest that demonstrably overcomes the state's general interest in police secrecy, it could not satisfy the clearly outweighs standard required by § 7922.000. Agency denials routinely prevail when the requester's interest is framed as merely a private legal pursuit, instead of a broad public good (e.g., police accountability).

**Neglect of Local Procedural Mandates:** The most significant oversight was likely the failure to aggressively invoke the non-compliance issues stemming from S.F. Admin Code § 67.27. In San Francisco, challenging a denial based on procedural failure to segregate and specify non-exempt content is often the most direct path to obtaining relief or forcing a detailed re-evaluation.

## VI. Strategic Rewrite: A Dual-Track Challenge to the SFPD Denial

The following framework presents the strategic components for a persuasive legal memorandum designed to challenge the SFPD's denial, incorporating the hierarchy of state and local legal requirements.

### A. Track 1: Rebutting the Factual Claim and Demanding Segregability (Challenging § 7923.600)

The revised argument must initiate a narrow challenge to the SFPD's broad application of Government Code § 7923.600 by asserting that the records sought do not satisfy the required primary purpose test.

The records requested must be classified as routine documentation of operational activities, administrative logging, or internal procedural communications, which were not compiled primarily for the purpose of a specific, foreseeable criminal prosecution. This distinction is supported by appellate authority which rejects the categorical inclusion of all police-generated records under the investigatory exemption.

Even if the records are deemed partially exempt, the SFPD has issued a denial that violates its duty of segregability. The response fails to identify the nature and extent of the non-exempt information, nor does it demonstrate a good-faith effort to redact and release segregable portions. This failure violates the fundamental disclosure principle of the CPRA and constitutes a direct procedural violation of S.F. Admin Code § 67.27(d). A full, unredacted denial based on an assumption of blanket exemption cannot stand.

#### B. Track 2: Asserting the Mandatory Public Interest Override (Compelling § 7922.000 Balancing)

The core legal demand must be for the SFPD to comply with Government Code § 7922.000, which requires explicit, case-specific justification for non-disclosure.

The argument must state unequivocally that the SFPD has violated its statutory obligation by failing to articulate how the public interest served by non-disclosure clearly outweighs the defined public interest in disclosure. This is not an optional analysis; it is a mandatory prerequisite for using any permissive exemption.

The memorandum must then rigorously define the specific, compelling public interest served by disclosure, focusing on the need for effective democratic oversight of the SFPD, evaluation of training and resource deployment, and verification of official conduct. If the records are related to an inactive investigation, the argument must emphasize that the public interest in maintaining secrecy is severely diluted, while the public interest in police accountability remains paramount. Any claimed harm by the SFPD (e.g., speculative compromise of future methods) must be characterized as generalized or conjectural, insufficient to meet the "clearly outweighs" threshold favoring transparency.

#### C. Procedural Enforcement (Invoking S.F. Admin Code § 67.27)

The procedural deficiency under local law provides the strongest initial basis for reversal. The memorandum must formally request that the SFPD acknowledge the denial is procedurally defective under S.F. Admin Code § 67.27(d) for failing to specify the non-exempt content.

This provides a clear pathway for administrative appeal to the San Francisco Supervisor of Records or the Sunshine Ordinance Task Force (SOTF). Administrative findings of procedural non-compliance can efficiently compel the SFPD to return to the request, perform the necessary segregation, and conduct the mandatory § 7922.000 balancing test, creating a comprehensive record for any subsequent judicial review in San Francisco Superior Court.

VII. Synthesis of Key Legal Relationships and Conclusions

A successful challenge to the SFPD’s denial requires navigating the complex interplay between specific state exemptions, the mandatory state override test, and heightened local procedural standards. The SFPD cannot rely solely on the permissive language of Government Code § 7923.600. It must justify its decision against the mandatory, pro-disclosure framework established by state and local law.

A. CPRA Statutory Comparison and Application to SFPD

The following table synthesizes the relationship between the key CPRA statutes relevant to the SFPD denial and outlines the appropriate legal counterpoints.

CPRA Statutory Comparison and Application to SFPD

Government Code Section	Former Statute	Exemption Type	SFPD Implication	Strategic Counterpoint
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§ 7923.600				
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§ 6254(f)				
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Specific Permissive

Primary citation for withholding law enforcement investigatory records and complaints.

Requires case-specific analysis (Castañares) and is subject to the mandatory balancing test.

#### § 7922.000 § 6255 Mandatory Balancing Test (Override)

Forces agency to justify withholding by proving public harm clearly outweighs public benefit of disclosure.

Failure to explicitly perform and document this test is grounds for violation.

#### § 7922.54(a) N/A Procedural Requirement

Mandates a written response for denial.

The written denial must be factually specific, articulate the balancing test, and comply with local law (§ 67.27).

#### § 7927.700 § 6254(c) Specific Permissive

Exempts personnel files constituting an unwarranted invasion of privacy.

If invoked alongside § 7923.600, it requires a separate, demonstrable balancing of privacy vs. public interest.

#### B. San Francisco Administrative Code § 67.27 Compliance Audit

The local ordinance provides immediate, compelling grounds for relief based on procedural non-compliance. The SFPD must adhere to these enhanced transparency rules.

#### S.F. Administrative Code § 67.27 Compliance Audit

#### S.F. Admin Code § 67.27 Requirement SFPD Obligation for Denial Challenge Point

##### (a) Citing Specific Permissive Exemption

Must cite 7923.600 as the specific permissive authority asserted.

The SFPD must confirm its understanding that the exemption is permissive, not a mandatory

prohibition against disclosure.

#### (d) Informing on Nonexempt Content

Must inform the requester of the nature and extent of nonexempt information and suggest alternative sources.

The SFPD's blanket denial violated this mandate by failing to conduct and report on the segregation of responsive records.

#### C. Conclusions and Recommendations

The SFPD's denial, based solely on Government Code § 7923.600, presents a strong case for successful administrative and potential judicial challenge due to critical statutory and procedural omissions.

**Mandatory Recourse to Local Appeals:** The SFPD's denial is highly likely to be procedurally defective under S.F. Admin Code § 67.27(d). The primary action should be an immediate appeal to the Sunshine Ordinance Task Force (SOTF) or the Supervisor of Records to secure a ruling on this procedural deficiency, compelling the SFPD to re-evaluate the request under the required segregation and specificity standards.

**Substantive Burden Shift:** The central legal argument must pivot the burden of proof entirely onto the SFPD. The agency must be forced to articulate, in detail, how the public interest in maintaining secrecy clearly outweighs the public interest in oversight and accountability, as required by Gov. Code § 7922.000. Failure to provide such a rigorous, documented balancing test is a clear violation of state law.

**Reframing the Records:** The challenge must leverage evolving case law, such as the principles established in *Castañares*, to argue that the records sought are routine operational documents or administrative files rather than pure investigatory files compiled for prosecution, thereby narrowing the scope of the § 7923.600 exemption.

By executing this multi-layered strategic challenge, the requester can overcome the generalized claim of the investigatory exemption and compel the SFPD to either release the records or provide a legally sufficient, detailed, and compliant justification for withholding, thereby enhancing public transparency and holding the local agency accountable to both state and municipal law.

Sources used in the report

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Opens in a new window

[shafter.com](https://shafter.com)

A GUIDE TO THE CALIFORNIA PUBLIC RECORDS ACT

Thoughts

Jared Stratton

On Tue, Sep 30, 2025, 2:28 PM SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)> wrote:

Hello, Mr. Stratton –

Thank you for your response to our request for supporting documents.

The Police Department's email [below] contains the text of your 9/28/2025 Public Records Act request in italics. Are we to consider that italicized text to be the documentation of your records request? Typically, we receive the initial request directly from the Petitioner so as to ensure its accuracy and the date that it was sent.

Best,

Pat

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

[1 Dr. Carlton B. Goodlett Place, Room 244](#)

Telephone 415-554-7719 | Fax 415-554-5163

[soff@sfgov.org](mailto:soff@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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*members of the public may inspect or copy.*

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**From:** Great Deeds <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>  
**Sent:** Tuesday, September 30, 2025 2:05 PM  
**To:** SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)>  
**Cc:** Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>  
**Subject:** Fwd: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)

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Jared Stratton

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

From: **SANFRANCISCO PD Support** <[sanfranciscopd@govqa.us](mailto:sanfranciscopd@govqa.us)>  
Date: Tue, Sep 30, 2025, 12:29 PM  
Subject: Public Records Request :: P225497-092825  
To: [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com) <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

--- Please respond above this line ---



September 30, 2025

Via email [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

Jared Stratton

[5575 Greenridge Road](#)

[Castro Valley, CA 94552](#)

RE: Public Records Request, dated September 28, 2025, Reference # P225497-092825

Dear Jared Stratton:

The San Francisco Police Department (SFPD) received your Public Records Act request, dated September 28, 2025, on September 30, 2025.

You requested, "*Dear Lieutenant Heppler,*

*This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975.*

*Our request is grounded in the California Constitution, which establishes that access to government information is a "fundamental and necessary right of every person in this state" (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. Your department's blanket denial, based on a single statutory citation, fails to meet the legal burden of providing a specific, factual justification for withholding records of immense public importance.*

*While we acknowledge the investigatory files exemption under § 7923.600 and the*

*precedent set by Williams v. Superior Court (1993) 5 Cal.4th 337, a mechanical application of this exemption to a nearly 50-year-old case is unreasonable and contrary to the public interest. The original justifications for this exemption—to protect witness safety, prevent the destruction of evidence, and shield investigative techniques—have been eroded to the point of nonexistence by the passage of five decades. To claim that this file remains exempt simply by labeling the case as perpetually "open" creates a legal fiction that would shield the SFPD from all public accountability for its handling of one of San Francisco's most notorious unsolved serial murder cases.*

*Even if the file technically falls within the exemption, the CPRA's public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy.*

*Urgent Public Safety Interest: The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a "strong person of interest" and, most critically, is believed to be "alive and living in the Bay Area". This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution.*

*Government Accountability: The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-generational failure of the justice system. The public has a right to scrutinize the SFPD's original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department's contemporary handling of the case and understand the specific evidentiary or procedural hurdles that prevent an arrest today.*

*Waiver of Secrecy by Public Solicitation: The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to solicit assistance in this very case. This includes:*

*Holding multiple press conferences to release details of the investigation.*

*Publishing a 1975 forensic sketch of the suspect alongside a modern, age-*

*progressed rendering.*

*Releasing audio from a 1974 911 call related to the discovery of a victim's body.*

*Increasing a public reward for information to \$250,000.*

*It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case.*

*Finally, your blanket denial violates the CPRA's mandatory duty to segregate and redact. Cal. Govt. Code § 7922.525(b) requires that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law." A wholesale refusal to release any part of the file is a clear violation of this statute.*

*Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. In the alternative, should you maintain that specific portions of the file are lawfully exempt, we demand that you produce the entire file with only those specific portions redacted, accompanied by a detailed index justifying each redaction under law.*

*Please be advised that if you fail to provide the requested records within the statutory timeframe, we will consider this a final denial. We will then pursue all available legal remedies, including filing a petition with the San Francisco Supervisor of Records under the San Francisco Sunshine Ordinance (S.F. Administrative Code § 67.21(d)) and initiating litigation to compel disclosure under the CPRA.*

*We expect a prompt and substantive response.*

*Sincerely,*

*Jared Stratton"*

Generally, SFPD declines to release records to an open investigation under California Government Code Section 7923.600, which exempts from disclosure records of complaints to, investigations conducted by, intelligence information or security procedures of, and investigatory or security files compiled by local police agencies. As such, we are unable to provide you with the information you seek, as disclosure of information may endanger successful completion of the investigation.



Thank you for your attention.

Sincerely,

Lieutenant William Heppler #1726

Officer In Charge

Risk Management - Legal Division

---

To monitor the progress or update this request please log into the [SFPD Public Records Center](#).

---

**This is an auto-generated email and has originated from an unmonitored email account.  
Please DO NOT REPLY.**

---

**From:** [Great Deeds](#)  
**To:** [SOTF \(BOS\)](#)  
**Cc:** [Heppler, William \(POL\)](#); [Somera, Alisa \(BOS\)](#)  
**Subject:** Re: Notice of Hearing: Sunshine Ordinance Task Force, Complaint Committee, Tuesday 10/21/2025 Convenes at 5:30 p.m. (File No. 25075)  
**Date:** Thursday, October 9, 2025 12:36:43 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image001.png](#)  
[image002.png](#)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

This is to confirm my attendance.

Our legal argument is more than sufficient.

We trust the Committee and SFPD will do the right thing by releasing the full unredacted police file on the Doodler.

The killer lives in Oakland. What we want is justice .

This case is over 50 years old.

We want to know if the SFPD has DNA evidence. If so how come it is taking so long ?

We also know there is some colorful language about gay men in the reports, and we believe the SFPD is hiding the whole file because in 1974-75 they were still bigots.

And Mr. Heppler your blanket denial is insufficient and frankly it's insulting.

You swore to uphold the law. Well the law requires you turn over the whole file.

Do the right thing.

Gay people are humans too.

We want justice.

Jared Stratton

On Thu, Oct 9, 2025, 11:17 AM SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)> wrote:

Hello –

The following Sunshine Ordinance Task Force matters have been scheduled for hearing as follows:

**Date:** Tuesday, October 21, 2025 (Hybrid Meeting in-person/remote)

**Location:** Hearing Room 408, City Hall, San Francisco, CA 94102

Time: Meeting Convenes – 5:30 p.m.

Information regarding how to participate via telephone or via teleconference (Webex) will be listed on the Agenda. Agendas are available [online](#) and at the [San Francisco Public Library](#) at least 72 hours before the meeting.

### **Why Am I Receiving This Notice?**

You are receiving this notice because you are named as a Complainant or Respondent in one of the following complaints scheduled for hearing to: 1) hear the merits of the complaint; 2) issue a determination; and/or 3) consider referrals from a Task Force Committee,

*or*

You are receiving this notice because you are named as a Complainant or Respondent in one of the following complaints for a hearing to: 1) determine if the Task Force has jurisdiction; 2) review the merits of the complaints; and/or 3) issue a report and/or recommendation to the SOTF.

### **Must I Attend?**

**Complainants:** Your attendance is required for this meeting/hearing.

**Respondents/Departments:** Pursuant to Section 67.21 (e) of the Ordinance the custodian of records, or a representative of your department who can speak to the matter, is required at the meeting/hearing.

## **IMPORTANT - CONFIRM YOUR ATTENDANCE**

- Petitioner's Failure to Appear at the meeting without prior notice will result in the file being **Closed**.
- Respondent's Failure to Appear will result in additional violations of the Sunshine Ordinance.

Confirm your attendance and submit any additional supplemental/support documents for inclusion

into the agenda packet by **5:00 p.m., Thursday, October 16, 2025.**

**Which Matters Will be Heard?**

**File No. 25033:** Complaint filed by Joudere Gaines against San Francisco Municipal Transportation Agency for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.21, by failing to respond to a public records request in a timely and/or complete manner.

**File No. 25070 (P214979-071125):** Complaint filed by Rosa L against the San Francisco Police Department for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.21, by failing to respond to a public records request in a timely and/or complete manner.

**File No. 25072: (P211969-061725):** Complaint filed by Annie Gilbertson against the San Francisco Police Department for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.24(d), by failing to allow access to law enforcement information.

**File No. 25074:** Complaint filed by Patrick Monette-Shaw against the Department of Public Health for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.5, by failing to hold open and public meetings.

**File No. 25075:** Complaint filed by Jared Stratton against San Francisco Police Department for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.21, by failing to respond to a public records request in a timely and/or complete manner.

**File No. 25077:** Complaint filed by Chikodi Chima against the Human Services Agency for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.21, by failing to respond to a public records request in a timely and/or complete manner.

Click [here](#) for the Complaint Procedures.

Thank you.

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

[1 Dr. Carlton B. Goodlett Place, Room 244](#)

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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# Respondent's Supporting Documents

**From:** [Heppler, William \(POL\)](#)  
**To:** [SOTF \(BOS\)](#)  
**Cc:** [Somera, Alisa \(BOS\)](#)  
**Subject:** SFPD Response: SOTF - Complaint Filed with the Sunshine Ordinance Task Force - Jared Stratton against San Francisco Police Department (File 25075)  
**Date:** Wednesday, October 1, 2025 12:35:15 PM  
**Attachments:** [image001.png](#)  
[SFPD SOTF Repsonse - 25075.pdf](#)  
[response docs SOTF 25075.pdf](#)

---

Please see attached SFPD response to Complaint file 25075 and response documents included.

Regards,

**Lt. William Heppler #1726**  
San Francisco Police Department  
*Risk Managment Office - Legal Division*  
SFPD - PHQ  
1245 3<sup>rd</sup> St.  
San Francisco, CA 94116  
415-837-7394 (main)  
415-837-7150 (direct)  
[william.heppler@sfgov.org](mailto:william.heppler@sfgov.org)

---

**From:** SOTF (BOS) <sotf@sfgov.org>  
**Sent:** Tuesday, September 30, 2025 1:56 PM  
**To:** Heppler, William (POL) <William.Heppler@sfgov.org>  
**Cc:** Somera, Alisa (BOS) <alisa.somera@sfgov.org>; j.stratton25@gmail.com <j.stratton25@gmail.com>  
**Subject:** SOTF - Complaint Filed with the Sunshine Ordinance Task Force - Jared Stratton against San Francisco Police Department (File 25075)

Good Afternoon:

A Sunshine Complaint has been filed with the Sunshine Ordinance Task Force (SOTF) against you and/or the organization listed below.

To provide the SOTF information in an easy-to-understand format the SOTF has prepared a revised request format for responding to complaints (see below). The SOTF requests that you submit your response to our office regarding the allegations including any and all supporting documents, recordings, electronic media, etc., to the SOTF within five (5) business days of this notice. In developing and submitting your response, please use the attached instructions, "Preparing San

Francisco Sunshine Ordinance Task Force Respondents Materials" to address your response to the complaint. This is your opportunity to provide a detailed explanation to allow the SOTF to be fully informed in considering your response prior to the meeting.

The following Complaint is attached.

**File No. 25075: Complaint filed by Jared Stratton against San Francisco Police Department for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.21 by failing to respond to a public records request in a timely and/or complete manner.**

SOTF Complaint Procedures: [https://sfgov.org/sunshine/sites/default/files/Complaint\\_Procedure.pdf](https://sfgov.org/sunshine/sites/default/files/Complaint_Procedure.pdf)

Please review the attached complaint as described above and acknowledge your department's position regarding the alleged violation of the Sunshine Ordinance and/or other related Codes by choosing ONE of the following responses:

- a) acknowledge noncompliance for all allegations below
- b) department/agency declares no-contest to all allegations below
- c) deny one or more allegations (please state an additional explanation which of the allegations you deny, and supporting evidence and/or argument)

You may, if you wish, also attach any additional explanation and supporting documentation.

If you or your entity acknowledges noncompliance or declares no-contest, the SOTF may, at its discretion, issue an Order of Determination against you or your entity for the allegations listed above without a hearing, and thereafter refer the matter to the Compliance & Amendments Committee for monitoring as needed.

Please refer to the File Number when submitting any new information and/or supporting documents pertaining to this complaint.

Thank you.

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

1 Dr. Carlton B. Goodlett Place, Room 244

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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**From:** [Heppler, William \(POL\)](#)  
**To:** [SOTF \(BOS\)](#)  
**Cc:** [Somera, Alisa \(BOS\)](#)  
**Subject:** Re: Notice of Hearing: Sunshine Ordinance Task Force, Complaint Committee, Tuesday 10/21/2025 Convenes at 5:30 p.m. (File No. 25075)  
**Date:** Tuesday, October 14, 2025 7:09:07 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
**Sensitivity:** Confidential

---

Confirmed, Myself or a member of the SFPD Legal Division will attend.

**Lt. William Heppler #1726**

San Francisco Police Department  
*Risk Managment Office - Legal Division*  
SFPD - PHQ  
1245 3<sup>rd</sup> St.  
San Francisco, CA 94116  
415-837-7394 (main)  
415-837-7150 (direct)  
[william.heppler@sfgov.org](mailto:william.heppler@sfgov.org)

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**From:** SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)>  
**Sent:** Thursday, October 9, 2025 11:15 AM  
**To:** [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com) <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>; Heppler, William (POL) <[William.Heppler@sfgov.org](mailto:William.Heppler@sfgov.org)>  
**Cc:** Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>  
**Subject:** Notice of Hearing: Sunshine Ordinance Task Force, Complaint Committee, Tuesday 10/21/2025 Convenes at 5:30 p.m. (File No. 25075)

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or

You are receiving this notice because you are named as a Complainant or Respondent in one of the following complaints for a hearing to: 1) determine if the Task Force has jurisdiction; 2) review the merits of the complaints; and/or 3) issue a report and/or recommendation to the SOTF.

**Must I Attend?**

**Complainants:** Your attendance is required for this meeting/hearing.

**Respondents/Departments:** Pursuant to Section 67.21 (e) of the Ordinance the custodian of records, or a representative of your department who can speak to the matter, is required at the meeting/hearing.

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- Respondent's Failure to Appear will result in additional violations of the Sunshine Ordinance.

Confirm your attendance and submit any additional supplemental/support documents for inclusion into the agenda packet by **5:00 p.m., Thursday, October 16, 2025**.

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**File No. 25075:** Complaint filed by Jared Stratton against San Francisco Police Department for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.21, by failing to respond to a public records request in a timely and/or complete manner.

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Click [here](#) for the Complaint Procedures.

Thank you.

*Patricia Petersen* (she/her)

Assistant Clerk  
Board of Supervisors  
1 Dr. Carlton B. Goodlett Place, Room 244  
Telephone 415-554-7719 | Fax 415-554-5163  
[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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# Other Documents

(Notice of Hearing, Communications, etc.)

**From:** [SOTF \(BOS\)](#)  
**To:** [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com); [SOTF \(BOS\)](#)  
**Cc:** [Somera, Alisa \(BOS\)](#)  
**Subject:** SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)  
**Date:** Tuesday, September 30, 2025 2:00:00 PM  
**Attachments:** [image001.png](#)

---

Good Afternoon.

The Sunshine Ordinance Task Force (SOTF) is in receipt of your complaint (attached). Upon review of your complaint the SOTF requires the following documents before we can proceed further and open a complaint file:

- Copy of the original public records request(s) you submitted to the San Francisco Police Department re records related to the investigation of “The Doodler”
- Copy of the response from the San Francisco Police Department

Please provide the requested documents within **five (5) business days**.

We will be unable to open a complaint file for you if a response is not received in a timely manner and the matter will be closed. You may re-file your complaint when you have the required documents ready to submit.

Thank you.

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

1 Dr. Carlton B. Goodlett Place, Room 244

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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**From:** [SOTF \(BOS\)](#)  
**To:** [Great Deeds; SOTF \(BOS\)](#)  
**Cc:** [Somera, Alisa \(BOS\)](#)  
**Subject:** RE: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)  
**Date:** Tuesday, September 30, 2025 2:28:00 PM  
**Attachments:** [image001.png](#)

---

Hello, Mr. Stratton –

Thank you for your response to our request for supporting documents.

The Police Department's email [below] contains the text of your 9/28/2025 Public Records Act request in italics. Are we to consider that italicized text to be the documentation of your records request? Typically, we receive the initial request directly from the Petitioner so as to ensure its accuracy and the date that it was sent.

Best,  
Pat

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

1 Dr. Carlton B. Goodlett Place, Room 244

Telephone 415-554-7719 | Fax 415-554-5163

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---

**From:** Great Deeds <j.stratton25@gmail.com>

**Sent:** Tuesday, September 30, 2025 2:05 PM

**To:** SOTF (BOS) <sotf@sfgov.org>

**Cc:** Somera, Alisa (BOS) <alisa.somera@sfgov.org>

**Subject:** Fwd: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Jared Stratton

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

From: **SANFRANCISCO PD Support** <[sanfranciscopd@govqa.us](mailto:sanfranciscopd@govqa.us)>

Date: Tue, Sep 30, 2025, 12:29 PM

Subject: Public Records Request :: P225497-092825

To: [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com) <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

--- Please respond above this line ---



September 30, 2025

Via email [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

Jared Stratton

[5575 Greenridge Road](#)

[Castro Valley, CA 94552](#)

RE: Public Records Request, dated September 28, 2025, Reference # P225497-092825



Dear Jared Stratton:

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*Even if the file technically falls within the exemption, the CPRA's public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy.*

*Urgent Public Safety Interest: The most compelling factor is one your own department*

*has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a "strong person of interest" and, most critically, is believed to be "alive and living in the Bay Area". This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution.*

*Government Accountability: The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-generational failure of the justice system. The public has a right to scrutinize the SFPD's original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department's contemporary handling of the case and understand the specific evidentiary or procedural hurdles that prevent an arrest today.*

*Waiver of Secrecy by Public Solicitation: The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to solicit assistance in this very case. This includes:*

*Holding multiple press conferences to release details of the investigation.*

*Publishing a 1975 forensic sketch of the suspect alongside a modern, age-progressed rendering.*

*Releasing audio from a 1974 911 call related to the discovery of a victim's body.*

*Increasing a public reward for information to \$250,000.*

*It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case.*

*Finally, your blanket denial violates the CPRA's mandatory duty to segregate and redact. Cal. Govt. Code § 7922.525(b) requires that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law." A wholesale refusal to release any part of the file is a clear violation of this statute.*

*Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. In the alternative, should you maintain that specific portions of the file are lawfully exempt, we demand that you produce the entire file with only those specific portions redacted, accompanied by a detailed index justifying each redaction under law.*

*Please be advised that if you fail to provide the requested records within the statutory timeframe, we will consider this a final denial. We will then pursue all available legal remedies, including filing a petition with the San Francisco Supervisor of Records under the San Francisco Sunshine Ordinance (S.F. Administrative Code § 67.21(d)) and initiating litigation to compel disclosure under the CPRA.*

*We expect a prompt and substantive response.*

*Sincerely,*

*Jared Stratton"*

Generally, SFPD declines to release records to an open investigation under California Government Code Section 7923.600, which exempts from disclosure records of complaints to, investigations conducted by, intelligence information or security procedures of, and investigatory or security files compiled by local police agencies. As such, we are unable to provide you with the information you seek, as disclosure of information may endanger successful completion of the investigation.

Thank you for your attention.

Sincerely,

Lieutenant William Heppler #1726  
Officer In Charge  
Risk Management - Legal Division

---

To monitor the progress or update this request please log into the [SFPD Public Records Center](#).

---

**This is an auto-generated email and has originated from an unmonitored email account. Please DO NOT REPLY.**

---

**From:** [SOTF \(BOS\)](#)  
**To:** [Great Deeds; SOTF \(BOS\)](#)  
**Cc:** [Somera, Alisa \(BOS\)](#)  
**Subject:** RE: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)  
**Date:** Tuesday, September 30, 2025 2:43:00 PM  
**Attachments:** [image001.png](#)

---

Thank you for the confirmation, Mr. Stratton.

The October 1, 2025 meeting of the full Task Force has been rescheduled to October 15, 2025 in observance of Yom Kippur.

Complaints are scheduled initially before a committee of the Task Force where the case is reviewed for jurisdiction and merit. From there, the matter is referred to the full Task Force for a discussing and hearing. The next available opportunity for your matter to be heard is Tuesday, October 21, 2025 before the Complaint Committee; you will be notified if your matter is agendized for that meeting.

Best,

Pat

---

**From:** Great Deeds

**Sent:** Tuesday, September 30, 2025 2:34 PM

**To:** SOTF (BOS)

**Cc:** Somera, Alisa (BOS)

**Subject:** Re: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)

Yes that was the record request with the SFPD blanket denial response. I have included the original request in the text below and included a screenshot. Let me know if you need anymore information or if this is sufficient.

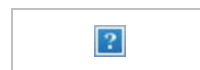
I see the October 1st meeting is canceled do you have a rescheduled date yet?

Thanks again,

Jared Stratton

[Skip to content](#)

## Public Records Portal



Jared Stratton

On Tue, Sep 30, 2025, 2:28 PM SOTF (BOS)

<[sotf@sfgov.org](mailto:sotf@sfgov.org)> wrote:

Hello, Mr. Stratton –

Thank you for your response to our request for supporting documents.

The Police Department's email [below] contains the text of your 9/28/2025 Public Records Act request in

italics. Are we to consider that italicized text to be the documentation of your records request? Typically, we

## MENU

Select Language ▼

- 
- 

## Public Records Request

**Request Type:**

Public Records Request

**Description:**

Public records are defined as any writing containing information relating to the conduct of the public's business prepared, owned, used, or retained by any state or local agency regardless of physical form or characteristics.

**Contact E-Mail:**

[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

**Reference No:**

P225497-092825

**Status:**

Completed

**Describe the Record(s)****Requested:**

Dear Lieutenant Heppler, This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your

denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975. Our request is grounded in the California Constitution, which establishes that access to government information is a "fundamental and necessary right of every person in this state" (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. Your department's blanket denial, based on a single statutory citation, fails to meet the legal burden of providing a specific, factual justification for withholding records of immense public importance. While we acknowledge the investigatory files exemption under § 7923.600 and the precedent set by *Williams v. Superior Court* (1993) 5 Cal.4th 337, a mechanical application of this exemption to a nearly 50-year-old case is unreasonable and contrary to the public interest. The original justifications for this exemption—to protect witness safety, prevent the destruction of evidence, and shield investigative techniques—have been eroded to the point of nonexistence by the passage of five decades. To claim that this file remains exempt simply by labeling the case as perpetually "open" creates a legal fiction that would shield the SFPD from all public accountability for its handling of one of San Francisco's most notorious

unsolved serial murder cases. Even if the file technically falls within the exemption, the CPRA's public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy.

**Urgent Public Safety Interest:** The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a "strong person of interest" and, most critically, is believed to be "alive and living in the Bay Area". This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution.

**Government Accountability:** The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-generational failure of the justice system. The public has a right to scrutinize the SFPD's original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department's contemporary handling of the case and understand the specific evidentiary or procedural hurdles that prevent an arrest today.

Waiver of Secrecy by Public

Solicitation: The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to solicit assistance in this very case. This includes: Holding multiple press conferences to release details of the investigation. Publishing a 1975 forensic sketch of the suspect alongside a modern, age-progressed rendering. Releasing audio from a 1974 911 call related to the discovery of a victim's body. Increasing a public reward for information to \$250,000. It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case. Finally, your blanket denial violates the CPRA's mandatory duty to segregate and redact. Cal. Govt. Code § 7922.525(b) requires that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law." A wholesale refusal to release any part of the file is a clear violation of this statute. Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. In the alternative, should you maintain that specific portions of the file are lawfully exempt, we demand that you produce the entire file



with only those specific portions redacted, accompanied by a detailed index justifying each redaction under law. Please be advised that if you fail to provide the requested records within the statutory timeframe, we will consider this a final denial. We will then pursue all available legal remedies, including filing a petition with the San Francisco Supervisor of Records under the San Francisco Sunshine Ordinance (S.F. Administrative Code § 67.21(d)) and initiating litigation to compel disclosure under the CPRA. We expect a prompt and substantive response. Sincerely, Jared Stratton

**Incident Number:** *if known*

**Police Officer(s) Involved:** *if known*

**Time of Incident:** *specify AM or PM, if known*

**Date Range From:** 01/01/1974  
*if applicable*

**Date Range To:** 01/01/2025  
*if applicable*

**Preferred Method to Receive Records:** Electronic via Records Center

Messages [Print Messages \(PDF\)](#)

☐ On 9/30/2025 12:29:16 PM, SANFRANCISCO PD Support wrote:

**Subject:** Public Records Request :: P225497-092825

**Body:**

September 30, 2025

Via email [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

Jared Stratton

5575 Greenridge Road

Castro Valley , CA 94552

RE: Public Records Request, dated September 28, 2025, Reference # P225497-092825

Dear Jared Stratton:

The San Francisco Police Department (SFPD) received your Public Records Act request, dated September 28, 2025, on September 30, 2025. You requested, "Dear Lieutenant Heppler,

*This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975.*

*Our request is grounded in the California Constitution, which establishes that access to government information is a "fundamental and necessary right of every person in this state" (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. Your department's blanket denial, based on a single statutory citation, fails to meet the legal burden of providing a specific, factual justification for withholding records of immense public importance.*

*While we acknowledge the investigatory files exemption under § 7923.600 and the precedent set by Williams v. Superior Court (1993) 5 Cal.4th 337, a mechanical application of this exemption to a nearly 50-year-old case is unreasonable and contrary to the public interest. The original justifications for this exemption—to protect witness safety, prevent the destruction of evidence, and shield investigative techniques—have been eroded to the point of nonexistence by the passage of five decades. To claim that this file remains exempt simply by labeling the case as perpetually "open" creates a legal fiction that would shield the SFPD from all public accountability for its handling of one of San Francisco's most notorious unsolved serial murder cases.*

*Even if the file technically falls within the exemption, the CPRA's public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy.*

*Urgent Public Safety Interest: The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a "strong person of interest" and, most critically, is believed to be "alive and living in the Bay Area". This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution.*

*Government Accountability: The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-*

*generational failure of the justice system. The public has a right to scrutinize the SFPD's original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department's contemporary handling of the case and understand the specific evidentiary or procedural hurdles that prevent an arrest today.*

*Waiver of Secrecy by Public Solicitation: The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to solicit assistance in this very case. This includes:*

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*Increasing a public reward for information to \$250,000.*

*It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case.*

*Finally, your blanket denial violates the CPRA's mandatory duty to segregate and redact. Cal. Govt. Code § 7922.525(b) requires that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law." A wholesale refusal to release any part of the file is a clear violation of this statute.*

*Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. In the alternative, should you maintain that specific portions of the file are lawfully exempt, we demand that you produce the entire file with only those specific portions redacted, accompanied by a detailed index justifying each redaction under law.*

*Please be advised that if you fail to provide the requested records within the statutory timeframe, we will consider this a final denial. We will then pursue all available legal remedies, including filing a petition with the San Francisco Supervisor of Records under the San Francisco Sunshine Ordinance (S.F. Administrative Code § 67.21(d)) and initiating litigation to compel disclosure under the CPRA.*

*We expect a prompt and substantive response.*

*Sincerely,*

*Jared Stratton*"

Generally, SFPD declines to release records to an open investigation under California Government Code Section 7923.600, which exempts from disclosure records of complaints to, investigations conducted by, intelligence information or security procedures of, and investigatory or security files compiled by local police agencies. As such, we are unable to provide you with the information you seek, as disclosure of information may endanger successful completion of the investigation.

Thank you for your attention.

Sincerely,

Lieutenant William Heppler #1726


Officer In Charge

Risk Management - Legal Division

☐ On 9/28/2025 5:57:15 AM, SANFRANCISCOPD Support wrote:

SFPDPatch



 On 9/28/2025 5:57:14 AM, Jared Stratton wrote:

GovQA is an SFPD authorized third party vendor which facilitates incident report request services for CISU. SFPD accepts no liability for the accuracy of content on the linked GovQA webpages. Members of the public may still make requests using U.S. mail or email by using the Incident Report Request Form(s). Those requests will be manually entered and tracked in the Incident Report Request Portal by a member of CISU. An account on the Incident Report Request Portal can be created to track the request online.

receive the initial request directly from the Petitioner so as to ensure its accuracy and the date that it was sent.

Best,  
Pat

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

[1 Dr. Carlton B. Goodlett Place, Room 244](#)

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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**From:** Great Deeds <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

**Sent:** Tuesday, September 30, 2025 2:05 PM

**To:** SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)>

**Cc:** Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>

**Subject:** Fwd: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Jared Stratton

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

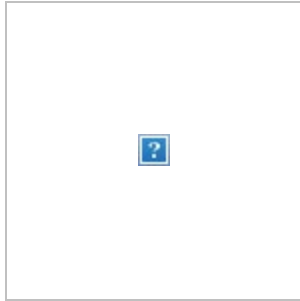
From: **SANFRANCISCOPD Support** <[sanfranciscopd@govqa.us](mailto:sanfranciscopd@govqa.us)>

Date: Tue, Sep 30, 2025, 12:29 PM

Subject: Public Records Request :: P225497-092825

To: [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com) <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

--- Please respond above this line ---



September 30, 2025

Via email [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

Jared Stratton

[5575 Greenridge Road](#)

[Castro Valley, CA 94552](#)

RE: Public Records Request, dated September 28, 2025, Reference # P225497-092825

Dear Jared Stratton:

The San Francisco Police Department (SFPD) received your Public Records Act request, dated September 28, 2025, on September 30, 2025.

You requested, "*Dear Lieutenant Heppler,*

*This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975.*

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*We expect a prompt and substantive response.*

*Sincerely,*



*Jared Stratton"*

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Thank you for your attention.

Sincerely,

Lieutenant William Heppler #1726

Officer In Charge

Risk Management - Legal Division

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To monitor the progress or update this request please log into the [SFPD Public Records Center](#).

---

**This is an auto-generated email and has originated from an unmonitored email account. Please DO NOT REPLY.**

---

**From:** [SOTF \(BOS\)](#)  
**To:** [Heppler, William \(POL\)](#)  
**Cc:** [Somera, Alisa \(BOS\)](#); [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)  
**Bcc:** [DSchmi4@aol.com](mailto:DSchmi4@aol.com)  
**Subject:** SOTF - Complaint Filed with the Sunshine Ordinance Task Force - Jared Stratton against San Francisco Police Department (File 25075)  
**Date:** Tuesday, September 30, 2025 1:56:00 PM  
**Attachments:** [Preparing SOTF Respondent Materials FINAL for PILOT.pdf](#)  
[25075 Complainant 20250930 Initial Complaint.pdf](#)  
[image001.png](#)

---

Good Afternoon:

A Sunshine Complaint has been filed with the Sunshine Ordinance Task Force (SOTF) against you and/or the organization listed below.

To provide the SOTF information in an easy-to-understand format the SOTF has prepared a revised request format for responding to complaints (see below). The SOTF requests that you submit your response to our office regarding the allegations including any and all supporting documents, recordings, electronic media, etc., to the SOTF within five (5) business days of this notice. In developing and submitting your response, please use the attached instructions, "Preparing San Francisco Sunshine Ordinance Task Force Respondents Materials" to address your response to the complaint. This is your opportunity to provide a detailed explanation to allow the SOTF to be fully informed in considering your response prior to the meeting.

The following Complaint is attached.

**File No. 25075: Complaint filed by Jared Stratton against San Francisco Police Department for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.21 by failing to respond to a public records request in a timely and/or complete manner.**

SOTF Complaint Procedures: [https://sfgov.org/sunshine/sites/default/files/Complaint\\_Procedure.pdf](https://sfgov.org/sunshine/sites/default/files/Complaint_Procedure.pdf)

Please review the attached complaint as described above and acknowledge your department's position regarding the alleged violation of the Sunshine Ordinance and/or other related Codes by choosing ONE of the following responses:

- a) acknowledge noncompliance for all allegations below
- b) department/agency declares no-contest to all allegations below
- c) deny one or more allegations (please state an additional explanation which of the allegations you deny, and supporting evidence and/or argument)

You may, if you wish, also attach any additional explanation and supporting documentation.

If you or your entity acknowledges noncompliance or declares no-contest, the SOTF may, at its discretion, issue an Order of Determination against you or your entity for the allegations listed above without a hearing, and thereafter refer the matter to the Compliance & Amendments Committee for monitoring as needed.

Please refer to the File Number when submitting any new information and/or supporting documents pertaining to this complaint.

Thank you.

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

1 Dr. Carlton B. Goodlett Place, Room 244

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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**From:** [SOTF \(BOS\)](#)  
**To:** [Great Deeds; SOTF \(BOS\)](#)  
**Cc:** [Somera, Alisa \(BOS\)](#)  
**Subject:** RE: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)  
**Date:** Wednesday, October 8, 2025 10:16:06 AM  
**Attachments:** [image001.png](#)

---

Good Morning, Mr. Stratton –

The Sunshine Ordinance Task Force (Task Force) has received your communication regarding the insufficiency of the San Francisco Police Department's invocation of California Government Code (Gov. Code) section 7923.600 as the basis for denying a request for public records.

Your desire to address the matter expeditiously is appreciated. The discourse that you propose, however, must await an open and public meeting to hear **File 25075**. The matter is tentatively scheduled before the Complaint Committee on 10/21/2025 for a review of jurisdiction and merit, and you will receive formal notification shortly.

Thank you.

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

1 Dr. Carlton B. Goodlett Place, Room 244

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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**From:** Great Deeds <j.stratton25@gmail.com>

**Sent:** Tuesday, October 7, 2025 9:21 PM

**To:** SOTF (BOS) <sotf@sfgov.org>

**Cc:** Somera, Alisa (BOS) <alisa.somera@sfgov.org>

**Subject:** Re: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)

Read this and tell me what you think. I dont want to waste your time or taxpayers money.

However this argument is so legally sound it should compelle all of you to want to seek Justice and Transparency .

The San Francisco Police Department (SFPD) has relied upon California Government Code (Gov. Code) section 7923.600 as the basis for denying a request for public records. This statute codifies the exemption protecting law enforcement investigatory records under the California Public Records Act (CPRA). The analysis presented herein demonstrates that a denial based solely on citing Gov. Code § 7923.600 is fundamentally insufficient and legally vulnerable under the established jurisprudence of the CPRA and the specific transparency mandates of the San Francisco Administrative Code.

#### A. Initial Assessment of the SFPD Denial

Government Code § 7923.600, which protects records relating to complaints, investigations, intelligence information, or security procedures of state and local police agencies, serves as a specific permissive exemption. Crucially, its permissive nature—stating the division "does not require the disclosure" —means its invocation does not automatically justify withholding records.

The primary defect in the SFPD’s denial, which likely contributed to the failure of the previous challenge, rests upon the agency’s presumed neglect of two mandatory legal requirements:

**Failure to Apply the Mandatory Public Interest Balancing Test:** California law, codified in Gov. Code § 7922.000, mandates that any agency seeking to withhold a record must demonstrate, on the facts of the particular case, that the public interest served by non-disclosure clearly outweighs the public interest served by disclosure. The absence of an explicit, written balancing test constitutes a substantive violation of the CPRA.

Failure to Meet San Francisco's Specific Justification Mandate: The SFPD operates under the stricter requirements of the San Francisco Sunshine Ordinance (S.F. Admin Code Chapter 67). Section 67.27(d) requires the agency to inform the requester of the nature and extent of the non-exempt information contained within the record and suggest alternative sources if most of the document is withheld. A boilerplate denial citing only the state statute is procedurally non-compliant under local law.

#### B. Strategic Pathway Recommendation

To successfully challenge the SFPD's denial, a comprehensive, dual-track strategy must be adopted, focusing initially on procedural leverage before engaging the merits of the investigatory exemption:

Track 1: Procedural Challenge (Immediate Leverage): Assert the denial is procedurally defective for non-compliance with S.F. Admin Code § 67.27 and the segregability mandates implicit in the CPRA. This forces the SFPD to issue a new, compliant response, often leading to the release of redacted material.

Track 2: Substantive Challenge (Mandatory Override): Systematically argue that the SFPD has failed to meet the mandatory clearly outweighs threshold of Gov. Code § 7922.000, regardless of whether § 7923.600 nominally applies. The argument must define the compelling public interest in disclosure (e.g., accountability and oversight) and demonstrate that any harm caused by disclosure is speculative or insufficient to overcome the legal presumption of openness.

The recommended course of action is to file a detailed legal memorandum with the SFPD, demanding compliance, followed immediately by administrative appeals to the San Francisco Supervisor of Records and/or the Sunshine Ordinance Task Force (SOTF).

## II. Statutory Foundation of the Denial: Government Code § 7923.600

### A. The Text of the Investigatory Records Exemption

California Government Code § 7923.600 is the specific statutory provision relied upon by the SFPD. The statute is explicit in its language regarding law enforcement records:

(a) Except as provided in Sections 7924.510, 7924.700, and 7929.610, this division does not require the disclosure of records of complaints to, or investigations conducted by, or records of intelligence information or security procedures of, the office of the Attorney General and the Department of Justice, the Office of Emergency Services and any state or local police agency, or any investigatory or security files compiled by any other state or local police agency, or any investigatory or security files compiled by any other state

or local agency for correctional, law enforcement, or licensing purposes.

The scope of this exemption is broad, encompassing not only state-level entities like the Attorney General's Office and the Department of Justice, but specifically "any state or local police agency". This provision allows the SFPD to potentially withhold records falling into several categories: complaints received, active or completed investigation files, intelligence data, or documentation of security procedures. The express inclusion of exceptions, such as those pertaining to environmental information and trade secrets (§§ 7924.510, 7924.700) , illustrates that the legislature intended for detailed balancing even within the exempt categories.

#### B. Historical Context and Legislative Intent

Gov. Code § 7923.600 is a recent recodification of the former Gov. Code § 6254, subdivision (f). This means that the long history of judicial review applied to the former statute remains the controlling authority for interpreting the application of § 7923.600 today. The recodification, effective January 1, 2023, did not change the substantive meaning or operation of the investigatory files exemption. Understanding this lineage is essential, as the prevailing judicial standards for determining what constitutes an "investigation" flow directly from precedents established under the prior code structure.

#### C. Judicial Interpretation of "Investigations Conducted By"

The critical ambiguity often exploited by law enforcement agencies is the definition of "investigations conducted by." The seminal California Supreme Court case addressing this issue is *Haynie v. Superior Court* (2001).

In *Haynie*, the court adopted a broad interpretation, holding that the exemption applies to records related to a specific incident where enforcement is "reasonably contemplated as a possibility," even if the interaction did not result in an immediate arrest or citation. The specific facts in *Haynie* involved a brief traffic stop, a search, and questioning by a deputy, yet the records documenting this event were deemed investigatory and potentially exempt. This standard allows agencies like the SFPD to justify withholding records generated during routine police contact, provided the records were compiled for potential enforcement.

Conversely, the application of this exemption is generally viewed as discretionary. For older, closed cases, the analysis often shifts, as records pertaining to investigations unrelated to any contemporaneous law enforcement activities are not required to be disclosed, but the statute permits withholding if they retain law enforcement utility. If the record pertains to a genuinely cold or closed case, the original justification for

secrecy—protecting the integrity of the investigation—diminishes, paving the way for the mandatory balancing test to compel release.

### III. Judicial Limitations and Strategic Counterpoints to Categorical Denial

While Haynie established a broad standard for what constitutes an investigation, subsequent judicial scrutiny, particularly in the context of modern digital records, has placed significant limitations on an agency's ability to employ blanket, categorical denials under Gov. Code § 7923.600.

#### A. Challenging the Categorical Application (The Castañares Rule)

Recent appellate court decisions have signaled a clear trend toward stricter scrutiny of agency denials, especially where agencies attempt to classify entire categories of records as automatically exempt based merely on the source or type of technology used. This judicial development erodes the concept of categorical immunity that the SFPD often assumes when citing § 7923.600.

In the 2023 case *Castañares v. Superior Court*, the Fourth District Court of Appeal held that police drone footage is not automatically exempt under § 7923.600. This decision clarified that the application of the investigatory exemption depends on the purpose for which the record was generated and maintained. The records must be demonstrably linked to an actual criminal or correctional investigation, rather than simply being artifacts of routine police operations.

The strategic implication of the Castañares rule is profound: any SFPD denial that attempts to claim that all records generated during a police interaction (e.g., body camera videos, administrative logs, internal communication about resource deployment) are automatically covered by the investigatory exemption is vulnerable. The argument must insist that the SFPD prove that the record was compiled primarily for a specific, imminent criminal or correctional purpose, forcing an item-by-item justification, rather than accepting a generalized claim that the documents relate to an "incident."

#### B. Distinguishing Between Routine Operational Records and True Investigatory Files

The strategic counter-argument must rigorously distinguish between essential investigative documentation (e.g., active witness interviews, evidence logs) and records generated as a byproduct of routine police administration. Records used primarily for administrative tracking, statistical analysis, fleet management, internal review, or non-evidentiary recording of a scene often do not fall squarely within the purpose of shielding investigatory materials. If the SFPD is withholding documentation that serves multiple



purposes, the agency must demonstrate that the dominant purpose is genuine law enforcement investigation, as defined by precedent.

### C. The Mandate for Severability and Redaction

Even in cases where a record does contain genuinely exempt investigatory material (e.g., active witness identities or investigative leads), the SFPD retains a mandatory duty to redact and disclose all non-exempt, segregable portions of the record. A blanket denial citing § 7923.600 implies a failure to conduct this segregability review. This fundamental obligation is reinforced both by the CPRA generally and by the specificity requirements of the San Francisco Sunshine Ordinance (S.F. Admin Code § 67.27(d)). If non-exempt information can be reasonably separated from exempt information—such as administrative dates, general policy applications, or unedited footage that does not reveal intelligence—the SFPD is obligated to release it. The failure to demonstrate this good-faith effort constitutes a procedural violation independent of the merits of the exemption claim.

## IV. The Mandatory Public Interest Override: Government Code § 7922.000

The most decisive flaw in a standard law enforcement denial under the CPRA is often the failure to address, or correctly apply, the mandatory balancing test codified in Government Code § 7922.000. This section provides a mandatory override, meaning that even if the record falls under the specific permissive exemption of § 7923.600, it still must be disclosed unless the agency meets a high burden of proof.

### A. Statutory Supremacy and Judicial Mandate

Government Code § 7922.000 (formerly Gov. Code § 6255) establishes the general exception test:

An agency shall justify withholding any record by demonstrating that the record in question is exempt under express provisions of this division, or that on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.

The statutory relationship between § 7923.600 and § 7922.000 is hierarchical. Since § 7923.600 is merely discretionary ("does not require disclosure"), the SFPD must nonetheless meet the mandatory requirement ("An agency shall justify withholding...") of § 7922.000. This means the agency cannot simply cite the investigatory nature of the record; it must proactively prove that keeping the record secret provides a greater public benefit than releasing it.

The legal threshold is deliberately set high: the interest in non-disclosure must clearly outweigh the public interest in disclosure. This is not an equal balancing test; it establishes a strong legal presumption in favor of transparency. The failure of the SFPD to articulate this mandatory balancing test in its initial denial, which is a common agency deficiency, renders the denial immediately susceptible to challenge.

#### B. Constructing the Public Interest Argument (Disclosure)

The strategic rewrite must articulate a compelling public interest in disclosure that is specifically tied to the public's fundamental right of access to information concerning the conduct of public business. Disclosure arguments should center on:

**Governmental Accountability:** The public interest in accessing these records stems from the need to ensure oversight of law enforcement activities, policy compliance, and the ethical conduct of public employees.

**Evaluating Policy and Procedure:** Records regarding complaints, investigations, or specific security procedures—even if nominally investigatory—often provide crucial insight into the agency's internal protocols and decision-making processes, which is vital for informed public discourse.

**Community Trust and Oversight:** For records concerning sensitive interactions or use of force, disclosure serves the overarching public interest in promoting trust between the SFPD and the communities it serves, particularly where historical context indicates a need for increased police accountability.

#### C. Deconstructing the Public Interest Argument (Nondisclosure)

The SFPD's justification for nondisclosure must be aggressively challenged. Law enforcement agencies typically rely on generalized harms such as jeopardizing future investigations, compromising intelligence sources, or protecting the safety of officers or witnesses.

It is critical to remember that the balancing test strictly weighs only public interests—the public interest in disclosure versus the public interest in non-disclosure. Agency interests (e.g., avoiding legal liability, minimizing administrative burden) or the private litigation interests of the requester are irrelevant to this statutory calculus.

If the matter documented by the record is concluded, or if the investigation is determined to be cold or dormant, the public interest in preserving investigative secrecy is significantly diminished, making it difficult for the SFPD to argue that secrecy "clearly

outweighs" the public benefit of transparency. The SFPD must demonstrate that the harm is concrete and substantial, not merely speculative or based on generalized fear of scrutiny.

## V. Review of SFPD Compliance and Critique of the Previous Argument

### A. The Unique Demands of the San Francisco Sunshine Ordinance

Law enforcement agencies operating within the City and County of San Francisco are subject to legal requirements that exceed the minimum standards established by the state CPRA. The San Francisco Sunshine Ordinance (S.F. Administrative Code Chapter 67) imposes heightened duties for disclosure and justification.

Specifically, S.F. Administrative Code § 67.27 mandates strict requirements for justifying any withholding of information. A denial must:

Cite the specific permissive exemption in the CPRA being asserted (e.g., § 7923.600) [6].

Provide specific statutory authority if disclosure is prohibited by law [7].

Crucially, Section 67.27(d) requires that when a record contains mostly exempt information, the custodian shall inform the requester of the nature and extent of the nonexempt information and suggest alternative sources.

This procedural mandate provides a powerful source of leverage. A simple, one-sentence denial citing Gov. Code § 7923.600 without addressing the presence of non-exempt material or the segregation duty, is procedurally defective under local San Francisco law. This procedural vulnerability allows the administrative appeals process (Supervisor of Records or SOTF) to compel a new, compliant response without having to immediately delve into the difficult merits of the investigatory exemption itself.

### B. Critique of the Previous Argument

The failure of the previous attempt to secure the records, cited in the user query, can be attributed to several likely strategic deficiencies that the rewrite must correct:

**Oversimplification of the Exemption:** The prior argument likely treated § 7923.600 as a point of categorical dispute (i.e., whether the record was investigatory or not), rather than treating it as a permissive threshold that is subordinate to the mandatory public interest balancing test of § 7922.000. By focusing only on the applicability of the exemption, the argument conceded the high ground of the mandatory override.

Lack of Specific Public Interest Framing: If the original request failed to articulate a compelling, specific public interest that demonstrably overcomes the state's general interest in police secrecy, it could not satisfy the clearly outweighs standard required by § 7922.000. Agency denials routinely prevail when the requester's interest is framed as merely a private legal pursuit, instead of a broad public good (e.g., police accountability).

Neglect of Local Procedural Mandates: The most significant oversight was likely the failure to aggressively invoke the non-compliance issues stemming from S.F. Admin Code § 67.27. In San Francisco, challenging a denial based on procedural failure to segregate and specify non-exempt content is often the most direct path to obtaining relief or forcing a detailed re-evaluation.

## VI. Strategic Rewrite: A Dual-Track Challenge to the SFPD Denial

The following framework presents the strategic components for a persuasive legal memorandum designed to challenge the SFPD's denial, incorporating the hierarchy of state and local legal requirements.

### A. Track 1: Rebutting the Factual Claim and Demanding Segregability (Challenging § 7923.600)

The revised argument must initiate a narrow challenge to the SFPD's broad application of Government Code § 7923.600 by asserting that the records sought do not satisfy the required primary purpose test.

The records requested must be classified as routine documentation of operational activities, administrative logging, or internal procedural communications, which were not compiled primarily for the purpose of a specific, foreseeable criminal prosecution. This distinction is supported by appellate authority which rejects the categorical inclusion of all police-generated records under the investigatory exemption.

Even if the records are deemed partially exempt, the SFPD has issued a denial that violates its duty of segregability. The response fails to identify the nature and extent of the non-exempt information, nor does it demonstrate a good-faith effort to redact and release segregable portions. This failure violates the fundamental disclosure principle of the CPRA and constitutes a direct procedural violation of S.F. Admin Code § 67.27(d). A full, unredacted denial based on an assumption of blanket exemption cannot stand.

### B. Track 2: Asserting the Mandatory Public Interest Override (Compelling § 7922.000 Balancing)

The core legal demand must be for the SFPD to comply with Government Code § 7922.000, which requires explicit, case-specific justification for non-disclosure.

The argument must state unequivocally that the SFPD has violated its statutory obligation by failing to articulate how the public interest served by non-disclosure clearly outweighs the defined public interest in disclosure. This is not an optional analysis; it is a mandatory prerequisite for using any permissive exemption.

The memorandum must then rigorously define the specific, compelling public interest served by disclosure, focusing on the need for effective democratic oversight of the SFPD, evaluation of training and resource deployment, and verification of official conduct. If the records are related to an inactive investigation, the argument must emphasize that the public interest in maintaining secrecy is severely diluted, while the public interest in police accountability remains paramount. Any claimed harm by the SFPD (e.g., speculative compromise of future methods) must be characterized as generalized or conjectural, insufficient to meet the "clearly outweighs" threshold favoring transparency.

#### C. Procedural Enforcement (Invoking S.F. Admin Code § 67.27)

The procedural deficiency under local law provides the strongest initial basis for reversal. The memorandum must formally request that the SFPD acknowledge the denial is procedurally defective under S.F. Admin Code § 67.27(d) for failing to specify the non-exempt content.

This provides a clear pathway for administrative appeal to the San Francisco Supervisor of Records or the Sunshine Ordinance Task Force (SOTF). Administrative findings of procedural non-compliance can efficiently compel the SFPD to return to the request, perform the necessary segregation, and conduct the mandatory § 7922.000 balancing test, creating a comprehensive record for any subsequent judicial review in San Francisco Superior Court.

### VII. Synthesis of Key Legal Relationships and Conclusions

A successful challenge to the SFPD's denial requires navigating the complex interplay between specific state exemptions, the mandatory state override test, and heightened local procedural standards. The SFPD cannot rely solely on the permissive language of Government Code § 7923.600. It must justify its decision against the mandatory, pro-disclosure framework established by state and local law.

#### A. CPRA Statutory Comparison and Application to SFPD

The following table synthesizes the relationship between the key CPRA statutes relevant to the SFPD denial and outlines the appropriate legal counterpoints.

#### CPRA Statutory Comparison and Application to SFPD

Government Code Section	Former Statute	Exemption Type	SFPD Implication	Strategic Counterpoint
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§ 7923.600				
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§ 6254(f)				
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Specific Permissive				
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Primary citation for withholding law enforcement investigatory records and complaints.				
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Requires case-specific analysis (Castañares) and is subject to the mandatory balancing test.				
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§ 7922.000 § 6255 Mandatory Balancing Test (Override)				
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Forces agency to justify withholding by proving public harm clearly outweighs public benefit of disclosure.				
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Failure to explicitly perform and document this test is grounds for violation.				
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§ 7922.54(a) N/A Procedural Requirement				
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Mandates a written response for denial.				
---	--	--	--	--

The written denial must be factually specific, articulate the balancing test, and comply with local law (§ 67.27).				
--	--	--	--	--

§ 7927.700 § 6254(c) Specific Permissive				
--	--	--	--	--

Exempts personnel files constituting an unwarranted invasion of privacy.				
--	--	--	--	--

If invoked alongside § 7923.600, it requires a separate, demonstrable balancing of privacy vs. public interest.				
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B. San Francisco Administrative Code § 67.27 Compliance Audit				
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The local ordinance provides immediate, compelling grounds for relief based on procedural non-compliance. The SFPD must adhere to these enhanced transparency rules.				
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S.F. Administrative Code § 67.27 Compliance Audit				
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## S.F. Admin Code § 67.27 Requirement SFPD Obligation for Denial Challenge Point

### (a) Citing Specific Permissive Exemption

Must cite 7923.600 as the specific permissive authority asserted.

The SFPD must confirm its understanding that the exemption is permissive, not a mandatory prohibition against disclosure.

### (d) Informing on Nonexempt Content

Must inform the requester of the nature and extent of nonexempt information and suggest alternative sources.

The SFPD's blanket denial violated this mandate by failing to conduct and report on the segregation of responsive records.

## C. Conclusions and Recommendations

The SFPD's denial, based solely on Government Code § 7923.600, presents a strong case for successful administrative and potential judicial challenge due to critical statutory and procedural omissions.

**Mandatory Recourse to Local Appeals:** The SFPD's denial is highly likely to be procedurally defective under S.F. Admin Code § 67.27(d). The primary action should be an immediate appeal to the Sunshine Ordinance Task Force (SOTF) or the Supervisor of Records to secure a ruling on this procedural deficiency, compelling the SFPD to re-evaluate the request under the required segregation and specificity standards.

**Substantive Burden Shift:** The central legal argument must pivot the burden of proof entirely onto the SFPD. The agency must be forced to articulate, in detail, how the public interest in maintaining secrecy clearly outweighs the public interest in oversight and accountability, as required by Gov. Code § 7922.000. Failure to provide such a rigorous, documented balancing test is a clear violation of state law.

**Reframing the Records:** The challenge must leverage evolving case law, such as the principles established in *Castañares*, to argue that the records sought are routine operational documents or administrative files rather than pure investigatory files compiled for prosecution, thereby narrowing the scope of the § 7923.600 exemption.

By executing this multi-layered strategic challenge, the requester can overcome the generalized claim of the investigatory exemption and compel the SFPD to either release the records or provide a legally sufficient, detailed, and compliant justification for

withholding, thereby enhancing public transparency and holding the local agency accountable to both state and municipal law.

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## A GUIDE TO THE CALIFORNIA PUBLIC RECORDS ACT

### Thoughts

Jared Stratton

On Tue, Sep 30, 2025, 2:28 PM SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)> wrote:

Hello, Mr. Stratton –

Thank you for your response to our request for supporting documents.

The Police Department's email [below] contains the text of your 9/28/2025 Public Records Act request in italics. Are we to consider that italicized text to be the documentation of your records request? Typically, we receive the initial request directly from the Petitioner so as to ensure its accuracy and the date that it was sent.

Best,  
Pat

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

[1 Dr. Carlton B. Goodlett Place, Room 244](#)

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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**From:** Great Deeds <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

**Sent:** Tuesday, September 30, 2025 2:05 PM

**To:** SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)>

**Cc:** Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>

**Subject:** Fwd: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)

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Jared Stratton

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**From:** **SANFRANCISCOPD Support** <[sanfranciscopd@govqa.us](mailto:sanfranciscopd@govqa.us)>

**Date:** Tue, Sep 30, 2025, 12:29 PM

**Subject:** Public Records Request :: P225497-092825

**To:** [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com) <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

--- Please respond above this line ---



September 30, 2025

Via email [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

Jared Stratton  
[5575 Greenridge Road](#)  
[Castro Valley, CA 94552](#)

RE: Public Records Request, dated September 28, 2025, Reference # P225497-092825

Dear Jared Stratton:

The San Francisco Police Department (SFPD) received your Public Records Act request, dated September 28, 2025, on September 30, 2025.

You requested, "*Dear Lieutenant Heppler,*

*This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975.*

*Our request is grounded in the California Constitution, which establishes that access to government information is a "fundamental and necessary right of every person in this state" (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. Your department's blanket denial, based on a single statutory citation, fails to meet the legal burden of providing a specific, factual justification for withholding records of immense public importance.*

*While we acknowledge the investigatory files exemption under § 7923.600 and the precedent set by Williams v. Superior Court (1993) 5 Cal.4th 337, a mechanical application of this exemption to a nearly 50-year-old case is unreasonable and contrary to the public interest. The original justifications for this exemption—to protect witness safety, prevent the destruction of evidence, and shield investigative techniques—have been eroded to the point of nonexistence by the passage of five decades. To claim that this file remains exempt simply by labeling the case as perpetually "open" creates a legal fiction that would shield the SFPD from all public accountability for its handling of one of San Francisco's most notorious unsolved serial murder cases.*

*Even if the file technically falls within the exemption, the CPRA's public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy.*

*Urgent Public Safety Interest: The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a "strong person of interest" and, most critically, is believed to be "alive and living in the Bay Area". This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution.*

*Government Accountability: The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-generational failure of the justice system. The public has a right to scrutinize the SFPD's original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department's contemporary handling of the case and understand the specific evidentiary or procedural hurdles that prevent an arrest today.*

*Waiver of Secrecy by Public Solicitation: The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to solicit assistance in this very case. This includes:*

*Holding multiple press conferences to release details of the investigation.*

*Publishing a 1975 forensic sketch of the suspect alongside a modern, age-progressed rendering.*

*Releasing audio from a 1974 911 call related to the discovery of a victim's body.*

*Increasing a public reward for information to \$250,000.*

*It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case.*

*Finally, your blanket denial violates the CPRA's mandatory duty to segregate and redact. Cal. Govt. Code § 7922.525(b) requires that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law." A wholesale refusal to release any part of the file is a clear violation of this statute.*

*Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. In the alternative, should you maintain that specific portions of the file are lawfully exempt, we demand that you produce the entire file with only those specific portions redacted, accompanied by a detailed index justifying each redaction under law.*

*Please be advised that if you fail to provide the requested records within the statutory timeframe, we will consider this a final denial. We will then pursue all available legal remedies, including filing a petition with the San Francisco Supervisor of Records under the San Francisco Sunshine Ordinance (S.F. Administrative Code § 67.21(d)) and initiating litigation to compel disclosure under the CPRA.*

*We expect a prompt and substantive response.*

*Sincerely,*

*Jared Stratton"*

Generally, SFPD declines to release records to an open investigation under California Government Code Section 7923.600, which exempts from disclosure records of complaints to, investigations conducted by, intelligence information or security procedures of, and investigatory or security files compiled by local police agencies. As such, we are unable to provide you with the information you seek, as disclosure of information may endanger successful completion of the investigation.

Thank you for your attention.

Sincerely,

Lieutenant William Heppler #1726  
Officer In Charge  
Risk Management - Legal Division

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To monitor the progress or update this request please log into the [SFPD Public](#)

[Records Center.](#)

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**This is an auto-generated email and has originated from an unmonitored email account. Please  
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**From:** [SOTF \(BOS\)](#)  
**To:** [Great Deeds; SOTF \(BOS\)](#)  
**Cc:** [Somera, Alisa \(BOS\); Heppler, William \(POL\)](#)  
**Subject:** RE: Subject: Formal Submission of Legal Memorandum for File 25075 – Challenge to SFPD Denial (Doodler Homicide Files)  
**Date:** Wednesday, October 8, 2025 11:48:20 AM  
**Attachments:** [image001.png](#)

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Hello, Mr. Stratton –

The Sunshine Ordinance Task Force has received your communication. It will be added to **File 25075**.

Thank you.

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

1 Dr. Carlton B. Goodlett Place, Room 244

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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**From:** Great Deeds <j.stratton25@gmail.com>

**Sent:** Wednesday, October 8, 2025 11:22 AM

**To:** SOTF (BOS) <sotf@sfgov.org>

**Subject:** Subject: Formal Submission of Legal Memorandum for File 25075 – Challenge to SFPD Denial (Doodler Homicide Files)



Dear Sunshine Ordinance Task Force Complaint Committee,

Thank you for the notification regarding the tentative hearing date of October 21, 2025, for File 25075. We acknowledge the scheduling and appreciate the Committee's commitment to reviewing this matter.

To facilitate an efficient and thorough review of jurisdiction and merit ahead of the hearing, we are hereby formally submitting our comprehensive legal memorandum, **"Expert Legal Analysis and Strategic Challenge to SFPD Denial Under California Government Code § 7923.600,"** for your immediate consideration.

This memorandum establishes that the San Francisco Police Department's denial is legally insufficient on two primary, mandatory grounds:

1. **Violation of State Law (Government Code § 7922.000):** The SFPD's reliance solely on the permissive investigatory exemption (Gov. Code 7923.600) fails to satisfy the mandatory "catch-all" public interest balancing test (Gov. Code 7922.000). [1, 2] The agency is legally obligated to demonstrate that the public interest served by not disclosing the records **clearly outweighs** the compelling public interest in accountability and oversight regarding this historical serial homicide case. The denial provides no such justification.
2. **Violation of Local Mandates (S.F. Admin Code § 67.27(d)):** The SFPD's blanket refusal constitutes a procedural violation of the San Francisco Sunshine Ordinance, which requires the agency to articulate the nature and extent of any non-exempt, segregable information within the files. [3] The failure to segment the historical 1970s documents from any genuinely current investigative leads is procedurally defective under local law.

We respectfully request that the Complaint Committee members review this detailed legal submission prior to the hearing. We look forward to presenting these findings on October 21, 2025, and obtaining an Order of Determination compelling the SFPD to comply with both state and local disclosure mandates.

Let's be transparent. We need justice for the victim's. SFPD has made this a public issue. It doesn't matter that it will embarrass them.

The dept at the time was very bigoted towards gay men. The report likely contains slurs and a lack of engagement, even when the knew who the suspect was.

If denied this will go viral and every gay person on the planet will see it.

Do the right thing please

Sincerely,

Jared Stratton

On Wed, Oct 8, 2025, 10:16 AM SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)> wrote:

Good Morning, Mr. Stratton –

The Sunshine Ordinance Task Force (Task Force) has received your communication regarding the insufficiency of the San Francisco Police Department’s invocation of California Government Code (Gov. Code) section 7923.600 as the basis for denying a request for public records.

Your desire to address the matter expeditiously is appreciated. The discourse that you propose, however, must await an open and public meeting to hear **File 25075**. The matter is tentatively scheduled before the Complaint Committee on 10/21/2025 for a review of jurisdiction and merit, and you will receive formal notification shortly.

Thank you.

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

[1 Dr. Carlton B. Goodlett Place, Room 244](#)

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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*with the Board of Supervisors and its committees. All written or oral communications that members of the public submit to the Clerk's Office regarding pending legislation or hearings will be made available to all members of the public for inspection and copying. The Clerk's Office does not redact any information from these submissions. This means that personal information—including names, phone numbers, addresses and similar information that a member of the public elects to submit to the Board and its committees—may appear on the Board of Supervisors website or in other public documents that members of the public may inspect or copy.*

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**From:** Great Deeds <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

**Sent:** Tuesday, October 7, 2025 9:21 PM

**To:** SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)>

**Cc:** Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>

**Subject:** Re: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)

Read this and tell me what you think. I dont want to waste your time or taxpayers money.

However this argument is so legally sound it should compelle all of you to want to seek Justice and Transparency .

The San Francisco Police Department (SFPD) has relied upon California Government Code (Gov. Code) section 7923.600 as the basis for denying a request for public records. This statute codifies the exemption protecting law enforcement investigatory records under the California Public Records Act (CPRA). The analysis presented herein demonstrates that a denial based solely on citing Gov. Code § 7923.600 is fundamentally insufficient and legally vulnerable under the established jurisprudence of the CPRA and the specific transparency mandates of the San Francisco Administrative Code.

#### A. Initial Assessment of the SFPD Denial

Government Code § 7923.600, which protects records relating to complaints, investigations, intelligence information, or security procedures of state and local police agencies, serves as a specific permissive exemption. Crucially, its permissive nature—stating the division "does not require the disclosure" —means its invocation does not automatically justify withholding records.

The primary defect in the SFPD's denial, which likely contributed to the failure of the

previous challenge, rests upon the agency's presumed neglect of two mandatory legal requirements:

**Failure to Apply the Mandatory Public Interest Balancing Test:** California law, codified in Gov. Code § 7922.000, mandates that any agency seeking to withhold a record must demonstrate, on the facts of the particular case, that the public interest served by non-disclosure clearly outweighs the public interest served by disclosure. The absence of an explicit, written balancing test constitutes a substantive violation of the CPRA.

**Failure to Meet San Francisco's Specific Justification Mandate:** The SFPD operates under the stricter requirements of the San Francisco Sunshine Ordinance (S.F. Admin Code Chapter 67). Section 67.27(d) requires the agency to inform the requester of the nature and extent of the non-exempt information contained within the record and suggest alternative sources if most of the document is withheld. A boilerplate denial citing only the state statute is procedurally non-compliant under local law.

#### B. Strategic Pathway Recommendation

To successfully challenge the SFPD's denial, a comprehensive, dual-track strategy must be adopted, focusing initially on procedural leverage before engaging the merits of the investigatory exemption:

**Track 1: Procedural Challenge (Immediate Leverage):** Assert the denial is procedurally defective for non-compliance with S.F. Admin Code § 67.27 and the segregability mandates implicit in the CPRA. This forces the SFPD to issue a new, compliant response, often leading to the release of redacted material.

**Track 2: Substantive Challenge (Mandatory Override):** Systematically argue that the SFPD has failed to meet the mandatory clearly outweighs threshold of Gov. Code § 7922.000, regardless of whether § 7923.600 nominally applies. The argument must define the compelling public interest in disclosure (e.g., accountability and oversight) and demonstrate that any harm caused by disclosure is speculative or insufficient to overcome the legal presumption of openness.

The recommended course of action is to file a detailed legal memorandum with the SFPD, demanding compliance, followed immediately by administrative appeals to the San Francisco Supervisor of Records and/or the Sunshine Ordinance Task Force (SOTF).

## II. Statutory Foundation of the Denial: Government Code § 7923.600

### A. The Text of the Investigatory Records Exemption

California Government Code § 7923.600 is the specific statutory provision relied upon by the SFPD. The statute is explicit in its language regarding law enforcement records:

(a) Except as provided in Sections 7924.510, 7924.700, and 7929.610, this division does not require the disclosure of records of complaints to, or investigations conducted by, or records of intelligence information or security procedures of, the office of the Attorney General and the Department of Justice, the Office of Emergency Services and any state or local police agency, or any investigatory or security files compiled by any other state or local police agency, or any investigatory or security files compiled by any other state or local agency for correctional, law enforcement, or licensing purposes.

The scope of this exemption is broad, encompassing not only state-level entities like the Attorney General's Office and the Department of Justice, but specifically "any state or local police agency". This provision allows the SFPD to potentially withhold records falling into several categories: complaints received, active or completed investigation files, intelligence data, or documentation of security procedures. The express inclusion of exceptions, such as those pertaining to environmental information and trade secrets (§§ 7924.510, 7924.700), illustrates that the legislature intended for detailed balancing even within the exempt categories.

### B. Historical Context and Legislative Intent

Gov. Code § 7923.600 is a recent recodification of the former Gov. Code § 6254, subdivision (f). This means that the long history of judicial review applied to the former statute remains the controlling authority for interpreting the application of § 7923.600 today. The recodification, effective January 1, 2023, did not change the substantive meaning or operation of the investigatory files exemption. Understanding this lineage is essential, as the prevailing judicial standards for determining what constitutes an "investigation" flow directly from precedents established under the prior code structure.

### C. Judicial Interpretation of "Investigations Conducted By"

The critical ambiguity often exploited by law enforcement agencies is the definition of "investigations conducted by." The seminal California Supreme Court case addressing this issue is *Haynie v. Superior Court* (2001).

In *Haynie*, the court adopted a broad interpretation, holding that the exemption

applies to records related to a specific incident where enforcement is "reasonably contemplated as a possibility," even if the interaction did not result in an immediate arrest or citation. The specific facts in Haynie involved a brief traffic stop, a search, and questioning by a deputy, yet the records documenting this event were deemed investigatory and potentially exempt. This standard allows agencies like the SFPD to justify withholding records generated during routine police contact, provided the records were compiled for potential enforcement.

Conversely, the application of this exemption is generally viewed as discretionary. For older, closed cases, the analysis often shifts, as records pertaining to investigations unrelated to any contemporaneous law enforcement activities are not required to be disclosed, but the statute permits withholding if they retain law enforcement utility. If the record pertains to a genuinely cold or closed case, the original justification for secrecy—protecting the integrity of the investigation—diminishes, paving the way for the mandatory balancing test to compel release.

### III. Judicial Limitations and Strategic Counterpoints to Categorical Denial

While Haynie established a broad standard for what constitutes an investigation, subsequent judicial scrutiny, particularly in the context of modern digital records, has placed significant limitations on an agency's ability to employ blanket, categorical denials under Gov. Code § 7923.600.

#### A. Challenging the Categorical Application (The Castañares Rule)

Recent appellate court decisions have signaled a clear trend toward stricter scrutiny of agency denials, especially where agencies attempt to classify entire categories of records as automatically exempt based merely on the source or type of technology used. This judicial development erodes the concept of categorical immunity that the SFPD often assumes when citing § 7923.600.

In the 2023 case *Castañares v. Superior Court*, the Fourth District Court of Appeal held that police drone footage is not automatically exempt under § 7923.600. This decision clarified that the application of the investigatory exemption depends on the purpose for which the record was generated and maintained. The records must be demonstrably linked to an actual criminal or correctional investigation, rather than simply being artifacts of routine police operations.

The strategic implication of the Castañares rule is profound: any SFPD denial that attempts to claim that all records generated during a police interaction (e.g., body camera videos, administrative logs, internal communication about resource

deployment) are automatically covered by the investigatory exemption is vulnerable. The argument must insist that the SFPD prove that the record was compiled primarily for a specific, imminent criminal or correctional purpose, forcing an item-by-item justification, rather than accepting a generalized claim that the documents relate to an "incident."

#### B. Distinguishing Between Routine Operational Records and True Investigatory Files

The strategic counter-argument must rigorously distinguish between essential investigative documentation (e.g., active witness interviews, evidence logs) and records generated as a byproduct of routine police administration. Records used primarily for administrative tracking, statistical analysis, fleet management, internal review, or non-evidentiary recording of a scene often do not fall squarely within the purpose of shielding investigatory materials. If the SFPD is withholding documentation that serves multiple purposes, the agency must demonstrate that the dominant purpose is genuine law enforcement investigation, as defined by precedent.

#### C. The Mandate for Severability and Redaction

Even in cases where a record does contain genuinely exempt investigatory material (e.g., active witness identities or investigative leads), the SFPD retains a mandatory duty to redact and disclose all non-exempt, segregable portions of the record. A blanket denial citing § 7923.600 implies a failure to conduct this segregability review. This fundamental obligation is reinforced both by the CPRA generally and by the specificity requirements of the San Francisco Sunshine Ordinance (S.F. Admin Code § 67.27(d)). If non-exempt information can be reasonably separated from exempt information—such as administrative dates, general policy applications, or unedited footage that does not reveal intelligence—the SFPD is obligated to release it. The failure to demonstrate this good-faith effort constitutes a procedural violation independent of the merits of the exemption claim.

#### IV. The Mandatory Public Interest Override: Government Code § 7922.000

The most decisive flaw in a standard law enforcement denial under the CPRA is often the failure to address, or correctly apply, the mandatory balancing test codified in Government Code § 7922.000. This section provides a mandatory override, meaning that even if the record falls under the specific permissive exemption of § 7923.600, it still must be disclosed unless the agency meets a high burden of proof.

#### A. Statutory Supremacy and Judicial Mandate

Government Code § 7922.000 (formerly Gov. Code § 6255) establishes the general exception test:

An agency shall justify withholding any record by demonstrating that the record in question is exempt under express provisions of this division, or that on the facts of the particular case the public interest served by not disclosing the record clearly outweighs the public interest served by disclosure of the record.

The statutory relationship between § 7923.600 and § 7922.000 is hierarchical. Since § 7923.600 is merely discretionary ("does not require disclosure"), the SFPD must nonetheless meet the mandatory requirement ("An agency shall justify withholding...") of § 7922.000. This means the agency cannot simply cite the investigatory nature of the record; it must proactively prove that keeping the record secret provides a greater public benefit than releasing it.

The legal threshold is deliberately set high: the interest in non-disclosure must clearly outweigh the public interest in disclosure. This is not an equal balancing test; it establishes a strong legal presumption in favor of transparency. The failure of the SFPD to articulate this mandatory balancing test in its initial denial, which is a common agency deficiency, renders the denial immediately susceptible to challenge.

#### B. Constructing the Public Interest Argument (Disclosure)

The strategic rewrite must articulate a compelling public interest in disclosure that is specifically tied to the public's fundamental right of access to information concerning the conduct of public business. Disclosure arguments should center on:

**Governmental Accountability:** The public interest in accessing these records stems from the need to ensure oversight of law enforcement activities, policy compliance, and the ethical conduct of public employees.

**Evaluating Policy and Procedure:** Records regarding complaints, investigations, or specific security procedures—even if nominally investigatory—often provide crucial insight into the agency's internal protocols and decision-making processes, which is vital for informed public discourse.

**Community Trust and Oversight:** For records concerning sensitive interactions or use of force, disclosure serves the overarching public interest in promoting trust between the SFPD and the communities it serves, particularly where historical context indicates a need for increased police accountability.

#### C. Deconstructing the Public Interest Argument (Nondisclosure)



The SFPD's justification for nondisclosure must be aggressively challenged. Law enforcement agencies typically rely on generalized harms such as jeopardizing future investigations, compromising intelligence sources, or protecting the safety of officers or witnesses.

It is critical to remember that the balancing test strictly weighs only public interests—the public interest in disclosure versus the public interest in non-disclosure. Agency interests (e.g., avoiding legal liability, minimizing administrative burden) or the private litigation interests of the requester are irrelevant to this statutory calculus.

If the matter documented by the record is concluded, or if the investigation is determined to be cold or dormant, the public interest in preserving investigative secrecy is significantly diminished, making it difficult for the SFPD to argue that secrecy "clearly outweighs" the public benefit of transparency. The SFPD must demonstrate that the harm is concrete and substantial, not merely speculative or based on generalized fear of scrutiny.

#### V. Review of SFPD Compliance and Critique of the Previous Argument

##### A. The Unique Demands of the San Francisco Sunshine Ordinance

Law enforcement agencies operating within the City and County of San Francisco are subject to legal requirements that exceed the minimum standards established by the state CPRA. The San Francisco Sunshine Ordinance (S.F. Administrative Code Chapter 67) imposes heightened duties for disclosure and justification.

Specifically, S.F. Administrative Code § 67.27 mandates strict requirements for justifying any withholding of information. A denial must:

Cite the specific permissive exemption in the CPRA being asserted (e.g., § 7923.600) [6].

Provide specific statutory authority if disclosure is prohibited by law [].

Crucially, Section 67.27(d) requires that when a record contains mostly exempt information, the custodian shall inform the requester of the nature and extent of the nonexempt information and suggest alternative sources.

This procedural mandate provides a powerful source of leverage. A simple, one-sentence denial citing Gov. Code § 7923.600 without addressing the presence of non-exempt material or the segregation duty, is procedurally defective under local San

Francisco law. This procedural vulnerability allows the administrative appeals process (Supervisor of Records or SOTF) to compel a new, compliant response without having to immediately delve into the difficult merits of the investigatory exemption itself.

#### B. Critique of the Previous Argument

The failure of the previous attempt to secure the records, cited in the user query, can be attributed to several likely strategic deficiencies that the rewrite must correct:

**Oversimplification of the Exemption:** The prior argument likely treated § 7923.600 as a point of categorical dispute (i.e., whether the record was investigatory or not), rather than treating it as a permissive threshold that is subordinate to the mandatory public interest balancing test of § 7922.000. By focusing only on the applicability of the exemption, the argument conceded the high ground of the mandatory override.

**Lack of Specific Public Interest Framing:** If the original request failed to articulate a compelling, specific public interest that demonstrably overcomes the state's general interest in police secrecy, it could not satisfy the clearly outweighs standard required by § 7922.000. Agency denials routinely prevail when the requester's interest is framed as merely a private legal pursuit, instead of a broad public good (e.g., police accountability).

**Neglect of Local Procedural Mandates:** The most significant oversight was likely the failure to aggressively invoke the non-compliance issues stemming from S.F. Admin Code § 67.27. In San Francisco, challenging a denial based on procedural failure to segregate and specify non-exempt content is often the most direct path to obtaining relief or forcing a detailed re-evaluation.

#### VI. Strategic Rewrite: A Dual-Track Challenge to the SFPD Denial

The following framework presents the strategic components for a persuasive legal memorandum designed to challenge the SFPD's denial, incorporating the hierarchy of state and local legal requirements.

##### A. Track 1: Rebutting the Factual Claim and Demanding Segregability (Challenging § 7923.600)

The revised argument must initiate a narrow challenge to the SFPD's broad application of Government Code § 7923.600 by asserting that the records sought do not satisfy the required primary purpose test.

The records requested must be classified as routine documentation of operational

activities, administrative logging, or internal procedural communications, which were not compiled primarily for the purpose of a specific, foreseeable criminal prosecution. This distinction is supported by appellate authority which rejects the categorical inclusion of all police-generated records under the investigatory exemption.

Even if the records are deemed partially exempt, the SFPD has issued a denial that violates its duty of segregability. The response fails to identify the nature and extent of the non-exempt information, nor does it demonstrate a good-faith effort to redact and release segregable portions. This failure violates the fundamental disclosure principle of the CPRA and constitutes a direct procedural violation of S.F. Admin Code § 67.27(d). A full, unredacted denial based on an assumption of blanket exemption cannot stand.

#### B. Track 2: Asserting the Mandatory Public Interest Override (Compelling § 7922.000 Balancing)

The core legal demand must be for the SFPD to comply with Government Code § 7922.000, which requires explicit, case-specific justification for non-disclosure.

The argument must state unequivocally that the SFPD has violated its statutory obligation by failing to articulate how the public interest served by non-disclosure clearly outweighs the defined public interest in disclosure. This is not an optional analysis; it is a mandatory prerequisite for using any permissive exemption.

The memorandum must then rigorously define the specific, compelling public interest served by disclosure, focusing on the need for effective democratic oversight of the SFPD, evaluation of training and resource deployment, and verification of official conduct. If the records are related to an inactive investigation, the argument must emphasize that the public interest in maintaining secrecy is severely diluted, while the public interest in police accountability remains paramount. Any claimed harm by the SFPD (e.g., speculative compromise of future methods) must be characterized as generalized or conjectural, insufficient to meet the "clearly outweighs" threshold favoring transparency.

#### C. Procedural Enforcement (Invoking S.F. Admin Code § 67.27)

The procedural deficiency under local law provides the strongest initial basis for reversal. The memorandum must formally request that the SFPD acknowledge the denial is procedurally defective under S.F. Admin Code § 67.27(d) for failing to specify the non-exempt content.

This provides a clear pathway for administrative appeal to the San Francisco Supervisor of Records or the Sunshine Ordinance Task Force (SOTF). Administrative findings of procedural non-compliance can efficiently compel the SFPD to return to the request, perform the necessary segregation, and conduct the mandatory § 7922.000 balancing test, creating a comprehensive record for any subsequent judicial review in San Francisco Superior Court.

## VII. Synthesis of Key Legal Relationships and Conclusions

A successful challenge to the SFPD’s denial requires navigating the complex interplay between specific state exemptions, the mandatory state override test, and heightened local procedural standards. The SFPD cannot rely solely on the permissive language of Government Code § 7923.600. It must justify its decision against the mandatory, pro-disclosure framework established by state and local law.

### A. CPRA Statutory Comparison and Application to SFPD

The following table synthesizes the relationship between the key CPRA statutes relevant to the SFPD denial and outlines the appropriate legal counterpoints.

#### CPRA Statutory Comparison and Application to SFPD

Government Code Section	Former Statute	Exemption Type	SFPD Implication	Strategic Counterpoint
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§ 7923.600				
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§ 6254(f)				
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Specific Permissive				
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Primary citation for withholding law enforcement investigatory records and complaints.				
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Requires case-specific analysis (Castañares) and is subject to the mandatory balancing test.				
--	--	--	--	--

§ 7922.000 § 6255 Mandatory Balancing Test (Override)				
---	--	--	--	--

Forces agency to justify withholding by proving public harm clearly outweighs public benefit of disclosure.				
---	--	--	--	--

Failure to explicitly perform and document this test is grounds for violation.				
--	--	--	--	--

§ 7922.54(a) N/A Procedural Requirement				
---	--	--	--	--

Mandates a written response for denial.

The written denial must be factually specific, articulate the balancing test, and comply with local law (§ 67.27).

§ 7927.700 § 6254(c) Specific Permissive

Exempts personnel files constituting an unwarranted invasion of privacy.

If invoked alongside § 7923.600, it requires a separate, demonstrable balancing of privacy vs. public interest.

B. San Francisco Administrative Code § 67.27 Compliance Audit

The local ordinance provides immediate, compelling grounds for relief based on procedural non-compliance. The SFPD must adhere to these enhanced transparency rules.

S.F. Administrative Code § 67.27 Compliance Audit

S.F. Admin Code § 67.27 Requirement SFPD Obligation for Denial Challenge Point

(a) Citing Specific Permissive Exemption

Must cite 7923.600 as the specific permissive authority asserted.

The SFPD must confirm its understanding that the exemption is permissive, not a mandatory prohibition against disclosure.

(d) Informing on Nonexempt Content

Must inform the requester of the nature and extent of nonexempt information and suggest alternative sources.

The SFPD's blanket denial violated this mandate by failing to conduct and report on the segregation of responsive records.

C. Conclusions and Recommendations

The SFPD's denial, based solely on Government Code § 7923.600, presents a strong case for successful administrative and potential judicial challenge due to critical statutory and procedural omissions.

Mandatory Recourse to Local Appeals: The SFPD's denial is highly likely to be procedurally defective under S.F. Admin Code § 67.27(d). The primary action should be an immediate appeal to the Sunshine Ordinance Task Force (SOTF) or the Supervisor of Records to secure a ruling on this procedural deficiency, compelling the

SFPD to re-evaluate the request under the required segregation and specificity standards.

**Substantive Burden Shift:** The central legal argument must pivot the burden of proof entirely onto the SFPD. The agency must be forced to articulate, in detail, how the public interest in maintaining secrecy clearly outweighs the public interest in oversight and accountability, as required by Gov. Code § 7922.000. Failure to provide such a rigorous, documented balancing test is a clear violation of state law.

**Reframing the Records:** The challenge must leverage evolving case law, such as the principles established in *Castañares*, to argue that the records sought are routine operational documents or administrative files rather than pure investigatory files compiled for prosecution, thereby narrowing the scope of the § 7923.600 exemption.

By executing this multi-layered strategic challenge, the requester can overcome the generalized claim of the investigatory exemption and compel the SFPD to either release the records or provide a legally sufficient, detailed, and compliant justification for withholding, thereby enhancing public transparency and holding the local agency accountable to both state and municipal law.

Sources used in the report

[codes.findlaw.com](https://codes.findlaw.com)

California Code, Government Code - GOV § 7923.600 - Codes - FindLaw  
Opens in a new window

[trackbill.com](https://trackbill.com)

Senate Floor Analyses  
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California Government Code § 7923.600 (2024) - Justia Law  
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[codes.findlaw.com](https://codes.findlaw.com)

California Code, Government Code - GOV § 7923.600 - Codes - FindLaw  
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[codes.findlaw.com](https://codes.findlaw.com)

California Code, Government Code - GOV § 7922.000 - Codes - FindLaw

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[sf-ca.elaws.us](https://sf-ca.elaws.us)

§ 67.27. JUSTIFICATION OF WITHHOLDING., Article III. PUBLIC INFORMATION AND PUBLIC RECORDS, Chapter 67. THE SAN FRANCISCO SUNSHINE ORDINANCE OF 1999, Administrative Code, San Francisco

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[sfneighborhoods.net](https://sfneighborhoods.net)

Systemic Problems with the Application of the San Francisco Sunshine Ordinance, the California Public Records Act and The Brown Act in the City and County of San Francisco - SF Neighborhoods

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[sonomacountylawlibrary.org](https://sonomacountylawlibrary.org)

Public Records Act - The Basics and Beyond Presentation for IOLERO Community Advisory Council

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[sfcityattorney.org](https://sfcityattorney.org)

Supervisor of Records - City Attorney of San Francisco

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[law.justia.com](https://law.justia.com)

California Government Code § 7924.510 (2024) - Justia Law

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[pattersonca.gov](https://pattersonca.gov)

The People's Business - A Guide to the California Public Records Act - Patterson, CA

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[lcwlegal.com](https://lcwlegal.com)

California Court of Appeal Rejects Categorical Treatment of Police Drone Videos as Exempt Records of Police Investigations, Raising Questions about Treatment of Other Police Videos Under the California Public Records Act

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[bbklaw.com](http://bbklaw.com)

California Supreme Court Denies Petition for Review in Police Drone Footage Case  
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[rcfp.org](http://rcfp.org)

Open Government Guide California - Reporters Committee for Freedom of the Press  
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[law.justia.com](http://law.justia.com)

California Government Code § 7922.000 (2024) - Justia Law  
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[post.ca.gov](http://post.ca.gov)

California Public Records Act FAQs - POST - CA.gov  
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[shafter.com](http://shafter.com)

A GUIDE TO THE CALIFORNIA PUBLIC RECORDS ACT

Thoughts

Jared Stratton

On Tue, Sep 30, 2025, 2:28 PM SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)> wrote:

Hello, Mr. Stratton –

Thank you for your response to our request for supporting documents.

The Police Department's email [below] contains the text of your 9/28/2025 Public Records Act request in italics. Are we to consider that italicized text to be the documentation of your records request? Typically, we receive the initial request directly from the Petitioner so as to ensure its accuracy and the date that it was sent.

Best,  
Pat

*Patricia Petersen* (she/her)

Assistant Clerk



Board of Supervisors

[1 Dr. Carlton B. Goodlett Place, Room 244](#)

Telephone 415-554-7719 | Fax 415-554-5163

[sotf@sfgov.org](mailto:sotf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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---

**From:** Great Deeds <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

**Sent:** Tuesday, September 30, 2025 2:05 PM

**To:** SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)>

**Cc:** Somera, Alisa (BOS) <[alisa.somera@sfgov.org](mailto:alisa.somera@sfgov.org)>

**Subject:** Fwd: Public Records Request :: P225497-092825 and Re: SOTF - Request for Supporting Documents - Jared Stratton against San Francisco Police Department (File 25075)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Jared Stratton

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

**From:** SANFRANCISCOPD Support <[sanfranciscopd@govqa.us](mailto:sanfranciscopd@govqa.us)>

**Date:** Tue, Sep 30, 2025, 12:29 PM

**Subject:** Public Records Request :: P225497-092825

To: [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com) <[j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)>

--- Please respond above this line ---



September 30, 2025

Via email [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com)

Jared Stratton  
[5575 Greenridge Road](#)  
[Castro Valley, CA 94552](#)

RE: Public Records Request, dated September 28, 2025, Reference # P225497-092825

Dear Jared Stratton:

The San Francisco Police Department (SFPD) received your Public Records Act request, dated September 28, 2025, on September 30, 2025.

You requested, "*Dear Lieutenant Heppler,*

*This letter is a formal appeal of the San Francisco Police Department's (SFPD) denial of our request for public records related to the investigation of the serial killer known as "The Doodler." Your denial letter, which cited only California Government Code § 7923.600, is both procedurally and substantively deficient. We hereby renew our request for the complete investigatory files pertaining to the murders and assaults attributed to this individual between 1974 and 1975.*

*Our request is grounded in the California Constitution, which establishes that*

access to government information is a “fundamental and necessary right of every person in this state” (Art. I, § 3(b)). This constitutional mandate requires that the CPRA, and its exemptions, be narrowly construed in favor of maximum disclosure. Your department’s blanket denial, based on a single statutory citation, fails to meet the legal burden of providing a specific, factual justification for withholding records of immense public importance.

While we acknowledge the investigatory files exemption under § 7923.600 and the precedent set by *Williams v. Superior Court* (1993) 5 Cal.4th 337, a mechanical application of this exemption to a nearly 50-year-old case is unreasonable and contrary to the public interest. The original justifications for this exemption—to protect witness safety, prevent the destruction of evidence, and shield investigative techniques—have been eroded to the point of nonexistence by the passage of five decades. To claim that this file remains exempt simply by labeling the case as perpetually “open” creates a legal fiction that would shield the SFPD from all public accountability for its handling of one of San Francisco’s most notorious unsolved serial murder cases.

Even if the file technically falls within the exemption, the CPRA’s public interest balancing test (Cal. Govt. Code § 7922.000) compels disclosure. The public interest in releasing these records overwhelmingly and clearly outweighs any conceivable interest in continued secrecy.

*Urgent Public Safety Interest:* The most compelling factor is one your own department has created. The SFPD has publicly confirmed that the prime suspect, identified in 1976, is still considered a “strong person of interest” and, most critically, is believed to be “alive and living in the Bay Area”. This is not a historical matter; it is a current and urgent public safety issue. The community has a right to understand the threat posed by this individual and to know why a man believed to be a serial killer has been allowed to live freely for nearly 50 years without arrest or prosecution.

*Government Accountability:* The CPRA is a cornerstone of government accountability. The Doodler case represents a profound, multi-generational failure of the justice system. The public has a right to scrutinize the SFPD’s original investigation to determine whether institutional homophobia and indifference toward the gay community contributed to the failure to secure a prosecution. Furthermore, the public has a right to assess the department’s contemporary handling of the case and understand the specific evidentiary or procedural hurdles

*that prevent an arrest today.*

*Waiver of Secrecy by Public Solicitation: The SFPD has, through its own actions, waived its right to claim that secrecy is paramount. Your department has engaged in a years-long public relations campaign to solicit assistance in this very case. This includes:*

*Holding multiple press conferences to release details of the investigation.*

*Publishing a 1975 forensic sketch of the suspect alongside a modern, age-progressed rendering.*

*Releasing audio from a 1974 911 call related to the discovery of a victim's body.*

*Increasing a public reward for information to \$250,000.*

*It is legally untenable and logically incoherent for the SFPD to simultaneously make the investigation a matter of intense public participation while claiming the underlying files are too sensitive for public view. Your department has already determined that public engagement, not secrecy, is the key to solving this case.*

*Finally, your blanket denial violates the CPRA's mandatory duty to segregate and redact. Cal. Govt. Code § 7922.525(b) requires that any "reasonably segregable portion of a record shall be available for inspection... after deletion of the portions that are exempted by law." A wholesale refusal to release any part of the file is a clear violation of this statute.*

*Therefore, we demand that you immediately reverse your denial and provide the complete, unredacted investigatory file on the Doodler case. In the alternative, should you maintain that specific portions of the file are lawfully exempt, we demand that you produce the entire file with only those specific portions redacted, accompanied by a detailed index justifying each redaction under law.*

*Please be advised that if you fail to provide the requested records within the statutory timeframe, we will consider this a final denial. We will then pursue all available legal remedies, including filing a petition with the San Francisco Supervisor of Records under the San Francisco Sunshine Ordinance (S.F. Administrative Code § 67.21(d)) and initiating litigation to compel disclosure under the CPRA.*

*We expect a prompt and substantive response.*

*Sincerely,*

*Jared Stratton"*

Generally, SFPD declines to release records to an open investigation under California Government Code Section 7923.600, which exempts from disclosure records of complaints to, investigations conducted by, intelligence information or security procedures of, and investigatory or security files compiled by local police agencies. As such, we are unable to provide you with the information you seek, as disclosure of information may endanger successful completion of the investigation.

Thank you for your attention.

Sincerely,

Lieutenant William Heppler #1726

Officer In Charge

Risk Management - Legal Division

---

To monitor the progress or update this request please log into the [SFPD Public Records Center](#).

---

**This is an auto-generated email and has originated from an unmonitored email account.  
Please DO NOT REPLY.**

---

**From:** [SOTF \(BOS\)](#)  
**To:** [j.stratton25@gmail.com](mailto:j.stratton25@gmail.com); [Heppler, William \(POL\)](#)  
**Cc:** [Somera, Alisa \(BOS\)](#)  
**Subject:** Notice of Hearing: Sunshine Ordinance Task Force, Complaint Committee, Tuesday 10/21/2025 Convenes at 5:30 p.m. (File No. 25075)  
**Date:** Thursday, October 9, 2025 11:04:00 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
**Sensitivity:** Confidential

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Hello –

The following Sunshine Ordinance Task Force matters have been scheduled for hearing as follows:

**Date:** Tuesday, October 21, 2025 (Hybrid Meeting in-person/remote)  
**Location:** Hearing Room 408, City Hall, San Francisco, CA 94102  
**Time:** Meeting Convenes – 5:30 p.m.

Information regarding how to participate via telephone or via teleconference (Webex) will be listed on the Agenda. Agendas are available [online](#) and at the [San Francisco Public Library](#) at least 72 hours before the meeting.

**Why Am I Receiving This Notice?**

You are receiving this notice because you are named as a Complainant or Respondent in one of the following complaints scheduled for hearing to: 1) hear the merits of the complaint; 2) issue a determination; and/or 3) consider referrals from a Task Force Committee,  
or

You are receiving this notice because you are named as a Complainant or Respondent in one of the following complaints for a hearing to: 1) determine if the Task Force has jurisdiction; 2) review the merits of the complaints; and/or 3) issue a report and/or recommendation to the SOTF.

**Must I Attend?**

**Complainants:** Your attendance is required for this meeting/hearing.

**Respondents/Departments:** Pursuant to Section 67.21 (e) of the Ordinance the custodian of records, or a representative of your department who can speak to the matter, is required at the meeting/hearing.

**IMPORTANT - CONFIRM YOUR ATTENDANCE**

- Petitioner's Failure to Appear at the meeting without prior notice will result in the file being **Closed**.
- Respondent's Failure to Appear will result in additional violations of the Sunshine Ordinance.

Confirm your attendance and submit any additional supplemental/support documents for inclusion into the agenda packet by **5:00 p.m., Thursday, October 16, 2025**.

**Which Matters Will be Heard?**

**File No. 25033:** Complaint filed by Joudere Gaines against San Francisco Municipal Transportation Agency for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.21, by failing to respond to a public records request in a timely and/or complete manner.

**File No. 25070 (P214979-071125):** Complaint filed by Rosa L against the San Francisco Police Department for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.21, by failing to respond to a public records request in a timely and/or complete manner.

**File No. 25072: (P211969-061725):** Complaint filed by Annie Gilbertson against the San Francisco Police Department for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.24(d), by failing to allow access to law enforcement information.

**File No. 25074:** Complaint filed by Patrick Monette-Shaw against the Department of Public Health for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.5, by failing to hold open and public meetings.

**File No. 25075:** Complaint filed by Jared Stratton against San Francisco Police Department for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.21, by failing to respond to a public records request in a timely and/or complete manner.

**File No. 25077:** Complaint filed by Chikodi Chima against the Human Services Agency for allegedly violating Administrative Code (Sunshine Ordinance), Section(s) 67.21, by failing to respond to a public records request in a timely and/or complete manner.

Click [here](#) for the Complaint Procedures.

Thank you.

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

1 Dr. Carlton B. Goodlett Place, Room 244

Telephone 415-554-7719 | Fax 415-554-5163

[sottf@sfgov.org](mailto:sottf@sfgov.org) | [www.sfbos.org](http://www.sfbos.org)



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**From:** [SOTF \(BOS\)](#)  
**To:** [Great Deeds](#); [SOTF \(BOS\)](#)  
**Cc:** [Heppler, William \(POL\)](#); [Somera, Alisa \(BOS\)](#)  
**Subject:** RE: Notice of Hearing: Sunshine Ordinance Task Force, Complaint Committee, Tuesday 10/21/2025 Convenes at 5:30 p.m. (File No. 25075)  
**Date:** Thursday, October 9, 2025 12:51:37 PM  
**Attachments:** [image002.png](#)  
[image003.png](#)

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Received, Mr. Stratton. Thank you for confirming your attendance at the Complaint Committee on 10/21/2025.

-P

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**From:** Great Deeds <j.stratton25@gmail.com>  
**Sent:** Thursday, October 9, 2025 12:36 PM  
**To:** SOTF (BOS) <sotf@sfgov.org>  
**Cc:** Heppler, William (POL) <William.Heppler@sfgov.org>; Somera, Alisa (BOS) <alisa.somera@sfgov.org>  
**Subject:** Re: Notice of Hearing: Sunshine Ordinance Task Force, Complaint Committee, Tuesday 10/21/2025 Convenes at 5:30 p.m. (File No. 25075)

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

This is to confirm my attendance.

Our legal argument is more than sufficient.

We trust the Committee and SFPD will do the right thing by releasing the full unredacted police file on the Doodler.

The killer lives in Oakland. What we want is justice .

This case is over 50 years old.

We want to know if the SFPD has DNA evidence. If so how come it is taking so long ?

We also know there is some colorful language about gay men in the reports, and we believe the SFPD is hiding the whole file because in 1974-75 they were still bigots.

And Mr. Heppler your blanket denial is insufficient and frankly it's insulting.

You swore to uphold the law. Well the law requires you turn over the whole file.

Do the right thing.

Gay people are humans too.

We want justice.



Jared Stratton

On Thu, Oct 9, 2025, 11:17 AM SOTF (BOS) <[sotf@sfgov.org](mailto:sotf@sfgov.org)> wrote:

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*or*

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Click [here](#) for the Complaint Procedures.

Thank you.

*Patricia Petersen* (she/her)

Assistant Clerk

Board of Supervisors

[1 Dr. Carlton B. Goodlett Place, Room 244](#)

Telephone 415-554-7719 | Fax 415-554-5163

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