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9 Center for American Liberty

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF ALAMEDA — RENÉ C. DAVIDSON COURTHOUSE**

13 **Center for American Liberty,**
14 a Virginia Not for Profit corporation;

15 Petitioner and Plaintiff

16 vs.

17 **The Regents of the University of California;**
18 and DOES 1 through 100, inclusive

19 Respondents and Defendants.

Case No.:

Judge:

Dept:

UNLIMITED JURISDICTION

Verified Petition for Writ of Mandate;
Complaint for Declaratory &

Injunctive Relief

[Gov. Code §§ 7921.000, et seq.]

20 Petitioner and Plaintiff Center for American Liberty, (“CAL”), alleges as follows:

21 1. In this action, CAL seeks to enforce its right to obtain public records pursuant to
22 the California Public Records Act, Government Code¹ section 7920.000² (“CPRA”) for several
23 CPRA requests to Respondent.

24 **FACTS**

25 2. This matter concerns Public Records Act requests contained in a letter from
26 Petitioner to Respondent The Regents of the University of California (“REGENTS”).

27 ¹ All undesignated code references are to the Government Code.

28 ² The legislature re-codified the Public Records Act from Government Code section 6250, et seq.
to section 7921.000, et seq effective on January 1, 2023.

PUBLIC RECORDS REQUESTS OF JANUARY 9, 2026

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2 3. On or about January 9, 2026 Petitioner issued a Public Records Act (“CPRA”) request to the Respondent The Regents of the University of California (“REGENTS” or “Respondent” or “agency”); specifically at its Berkeley, California campus. Petitioner’s PRA requests were regarding a certain November 11, 2025 event on the UC Berkeley campus by Turning Point USA (“TPUSA”), which featured Rob Schneider. A copy of CAL’s January 9, 2026 Public Records Act requests are attached hereto as Exhibit A. Those requests were for:

- 9 • All planning, logistical, or operational documents created by UC Berkeley’s UCPD, Campus Security & Event Operations, Apex Security Group, Student Affairs, Dean of Students Office, Risk Management, Berkeley Events & Conferences, or the Chancellor’s Office relating to the TPUSA event that occurred on November 11, 2025 at UC Berkeley featuring Rob Schneider (hereafter “TPUSA event”), including TPUSA event proposals, briefings, security plans, staffing plans, and ingress/egress plans prepared between August 1 and November 30, 2025.
- 14 • All security assessments, threat assessments, risk analyses, and crowd-management plans prepared by UC Berkeley personnel relating to the TPUSA event, including any policies or directives regarding access control, barricades, entrance management, or anticipated demonstrations.
- 17 • All communications—including emails, text messages, encrypted messaging (e.g., Signal, WhatsApp), Teams/Slack/Google Chat messages, and memoranda—sent or received by UCPD, Student Affairs, the Chancellor’s Office, Apex Security Group, Dean of Students, Public Affairs/Communications, Event Services, or Facilities Services, inclusive of those employed therein, that reference: “TPUSA,” “Turning Point,” “John Paul Leon”, “Rob Schneider,” “Schneider,” “Zellerbach”, “Frank Turek”, “Jobob Taeleifi”, “Trump”, “MAGA”, “protest,” “riot,” “blocked entrance,” “disruption,” or “event access” from August 1 to November 30, 2025.
- 23 • All documents and communications concerning the decision by UC Berkeley personnel to require tickets for the TPUSA event to be purchased using UC Berkeley’s ticketing system, <https://securetickets.berkeley.edu/events>.
- 26 • All communications between UC Berkeley personnel and TPUSA, TPUSA’s student chapter, Rob Schneider or his representatives, or external event organizers

1 relating to event planning, security, access, anticipated protests, or any changes to
2 the planned operation of the TPUSA event.

3 • All incident logs, dispatch logs, CAD logs, deployment orders, shift
4 assignments, post instructions, use-of-force reports, and
5 officer/security post-event summaries relating to the TPUSA event,
including any documentation of blocked entrances, crowd interference, or
attendee access problems.

6 • All video recordings from UCPD body-worn cameras, fixed security cameras, or
7 any mobile surveillance units covering the vicinity of the TPUSA event venue
8 during the period when attendees were entering or attempting to enter.

9 • All incident reports, arrest reports, Student Conduct reports, and after-action or
10 post-event evaluations prepared by UCPD, the Student Conduct Office, Risk
11 Management, the Dean of Students Office, Apex Security Group, or any
administrative unit regarding protests, disruptions, safety concerns, or barriers to
the TPUSA event's access.

12 • All policies, guidelines, or directives in effect during the TPUSA
13 event governing access to campus events, protest and demonstration
14 rules, time-place-manner restrictions, outdoor sound amplification rules, or any
temporary directives issued specifically for this TPUSA event.

15 • All communications between UC Berkeley and external agencies—including the
16 Berkeley Police Department, Alameda County Sheriff's Office, Apex Security
17 Group, city officials, or outside security contractors—regarding security planning,
staffing, protest monitoring, or anticipated disruptions at the TPUSA event.

18 • All complaints, reports, or communications received by UC Berkeley from
19 attendees or members of the public describing difficulty purchasing tickets for the
20 TPUSA event, difficulty entering the TPUSA event, blocked access points, or
21 interference by protesters, as well as any internal communications documenting
when UC Berkeley became aware of access problems.

22 • All cost records, invoices, staffing summaries, or internal budgeting records
23 relating to security, staffing, or operational decision-making for the TPUSA
event.

24 • Any document, regardless of form, created, maintained, or stored by UC
25 Berkeley that relates to the planning, administration, security, access, disruption,
26 or management of the TPUSA event.

27 4. These requests (Exhibit A) also included requests for responsive documents to be
28 delivered in electronic format if they were already stored in an electronic format, Govt. Code §

1 7922.570, and that private devices and accounts be searched for responsive documents pursuant
2 to *City of San Jose v. Superior Court (Smith)* (2017) 2 Cal. 5th 608.

3 5. On January 16, 2026, Respondent issued an electronic mail (e-mail) message to
4 Petitioner acknowledging the PRA requests and advising that it might take ten (10) weeks to
5 fulfill and that the requests were disclosable records in the possession of Respondent. Ten weeks
6 after January 16, 2026 ended on March 27, 2026. Attached hereto as Exhibit B is a true and
7 correct copy of electronic messages (e-mails) between Petitioner and Respondent between
8 January 9, 2026 and April 3, 2026.
9

10 6. On February 13, 2026, February 24, 2026, March 10, 2026 and April 3, 2026
11 Petitioner issued e-mails to Respondent asking when responsive documents would be disclosed.
12 Respondent did not respond to any of these inquiries. Exhibit B. Petitioner's March 10, 2026
13 communication to Respondent noted that if Respondent did not respond to Petitioner or disclose
14 responsive documents within 30 days (by April 9, 2026) Petitioner would need to file a Petition
15 for Writ of Mandate to enforce its rights under the Public Records Act. As noted above,
16 Respondent did not respond to any of Petitioner's communications in Exhibit B.
17
18

19 7. Also, as of the date of the filing of this Petition, Petitioner had not received any
20 responsive documents. This constitutes a breach of Respondent's duty to disclose responsive
21 documents promptly or at all.
22

23 8. In addition, as of the date of the filing of the original Petition, Respondent has not
24 claimed or notified Petitioner that any responsive documents have been withheld on the basis of
25 a claimed exemption and/or privilege.
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27
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1 22. An agency may not charge a requestor of responsive documents for the act of
2 searching for those documents or for review and redaction of any portion of a responsive
3 document where the agency is claiming it is subject to an exemption or privilege. *National*
4 *Lawyers Guild v. City of Hayward, et al* (2020) 9 Cal. 5th 488.

5 23. A local agency must, upon request, provide information in the electronic format it
6 is stored in (§ 7922.570).

7 24. A local agency must, upon request, provide a copy of any contract it has entered
8 into for goods or services. (§ 7928.801).

9 25. “Purpose of request for disclosure; effect. This division does not allow limitations
10 on the access to a public records based upon the purpose for which the request is being
11 requested, if the record is otherwise subject to disclosure.” (§ 7921.300)

12 26. Where the documents requested do not contain the substance of or excerpts from
13 “actual discussions or debate, or information showing how government policy was formed” and
14 nothing in the requested documents will impede future discussions and debate on policy, the
15 deliberative process exemption does not apply to justify denial of records disclosure. *Caldecott v.*
16 *Superior Court* (2015) 243 Cal. App. 4th 212, 234-235.

17 27. Documents that are not predecisional or deliberative but reflect the
18 implementation of policy are not subject to the deliberative process exemption. *American Civil*
19 *Liberties Union of Northern California v. Superior Court* (2011) 202 Cal. App. 4th 55, 76.

20 28. When being applied to grant access to information, the CPRA must be interpreted
21 broadly, and when being applied to deny access to information, CPRA exemptions must be
22 interpreted narrowly (Cal. Const., art. I, § 3).

- 1 e. Failure to disclose records that are in its possession and/or constructive possession; and /
2 or
3 f. Failure to “promptly” disclose responsive public records as required by the CPRA.

4 38. There is an actual controversy with respect to these violations because on
5 information and belief, Respondents dispute the factual basis for the violation and/or whether the
6 actions described violate the CPRA.
7

8 39. Declaratory relief is necessary to resolve these controversies and determine
9 whether Respondents have violated the CPRA as described above.

10 40. The CPRA specifically authorizes declaratory relief.
11

12 **THIRD CAUSE OF ACTION**
13 (Injunctive Relief — Gov. Code §§ 7923.000 – 7923.005)
14 Against all Respondents

15 41. Petitioner incorporates by reference all prior allegations and all prior paragraphs.

16 42. The CPRA specifically authorizes injunctive relief as a remedy for CPRA
17 violations.
18

19 43. As of the original filing of Petitioner’s Petition, Respondents had failed to
20 properly search for documents and/or had not disclosed responsive records to Petitioner.

21 44. The CPRA requires disclosure of public records regardless of whether the records
22 are in the responding agency’s actual possession. Records in the possession of an agency’s
23 employees or elected officials are public records even if the records are not under the agency’s
24 immediate control.

25 45. Petitioner seeks injunctive relief to:

- 26 a. Compel Respondents to disclose all public records responsive to CAL’s November 11,
27 2025 CPRA request that are in Respondent’s possession; and
28

1 b. Compel Respondents to disclose all responsive records not properly subject to an
2 exemption or privilege.

3 46. There is no monetary compensation that could adequately compensate Petitioner
4 or any other affected party for the infringement of this right.

5 47. Injunctive relief is necessary to prevent ongoing and future infringement of the
6 public's right to receive public records from Respondents in a timely fashion. Petitioner requests
7 injunctive relief to ensure Respondents' compliance with the CPRA.
8

9 **PRAYER FOR RELIEF**

10 Wherefore, Petitioner prays that this court:

11 As to the First Cause of Action:

12 48. Issue Peremptory and/or Alternative Writ of Mandate ordering Respondents to
13 promptly conduct a proper search for responsive records and to disclose to Petitioner all
14 improperly withheld records.
15

16 49. That for any documents Respondent REGENTS determines to withhold from
17 Petitioner (either partially via redactions or in its entirety) to prepare and submit to Petitioner a
18 privilege log containing the following information: the author of the document(s), the
19 recipient(s) of the document(s), the "cc" recipient(s) of the document, if any author and/or
20 recipient of a document is an attorney, the California State Bar number for that attorney, the date
21 of the document(s), the type of document (memorandum, letter, electronic mail, etc.), a brief
22 description of the document's title and subject matter and the exemption / privilege claimed; and
23

24 50. Issue a Peremptory and/or Alternative Writ of Mandate to order Respondents to
25 ensure that its Trustees and employees search their personal email accounts and electronic
26 devices for records responsive to Petitioner's request;
27
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1 As to the Second Cause of Action:

2 51. Enter a declaratory judgment that Respondents violated the CPRA by:

3 a) Failing to search for and disclose responsive public records-that that Respondent
4 and its employees and officials possess in Respondent's physical and electronic
5 files;

6 b) Failing to search for and disclose responsive public records that that Respondent's
7 employees and officials possess in their personal files, email accounts, and
8 electronic devices;

9 c) Failure to make a written determination as to whether Respondent possesses
10 disclosable public records;

11 d) Failing to promptly disclose the records that are responsive to Petitioner's CPRA
12 requests; and

13 e) Failure to disclose records that are not properly subject to an exemption /
14 privilege under the California Public Records Act;

15 and order Respondent to comply with its duties to Petitioner under the CPRA.
16
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18 As to the Third Cause of Action:

19 52. Issue an order compelling Respondents to search their private email accounts,
20 computers, and other electronic devices for public records that are responsive to Petitioner's
21 request and disclose same to Petitioner;
22

23 53. Issue an order compelling Respondent to search for and disclose to Petitioner all
24 responsive records not subject to any proper claim of exemption or privilege; and
25

26 As to all Causes of Action:

1 54. Award Petitioner’s attorneys’ fees and costs reasonably incurred in this action;
2 and

3 55. For such other and further relief as the Court deems proper.
4

5 Dated: April 13, 2026

Respectfully submitted,
LAW OFFICE OF CRAIG P. ALEXANDER

7 By: *Craig P. Alexander*

8 _____
9 Craig P. Alexander,
10 Attorneys for Petitioner and Plaintiff
11 Center for American Liberty, Inc.
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1 **VERIFICATION**

2 I, Josh Dixon, declare that I am the Vice President of Litigation of the Center for American
3 Liberty, the Petitioner in the above-entitled action. I have read the foregoing VERIFIED PETITION
4 FOR WRIT OF MANDATE; COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF and know the
5 contents thereof to be true of my own knowledge, except as to those statements made upon
6 information and belief, and as to those I believe them to be true.
7

8 I declare under penalty of perjury under the laws of the State of California that the foregoing is
9 true and correct.

10 Executed on April 13, 2026 in Charleston, South Carolina.
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12
13 */s/ Josh Dixon*
14 Josh Dixon
15 Vice President of Litigation
16 Center for American Liberty
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TABLE OF EXHIBITS

Exhibit	Description	Reference
A	CAL's January 9, 2026 CPRA Request	¶ 3
B	Electronic Mail (E-Mail) by and between Petitioner and Respondent between January 9, 2026 and April 3, 2026	¶ 5

EXHIBIT “A”



January 9, 2026

Via Electronic Mail

Public Records Office
University of California, Berkeley
200 California Hall, MC #1500
Berkeley, CA 94720-1500
pra@berkeley.edu

Re: Public Records Act Request

To Whom it May Concern,

The Center for American Liberty (CAL) is a 501(c)(3) nonprofit organization fighting against growing anti-free speech and anti-civil liberties trends in all levels of government, including California state and local governments. CAL is requesting access to records in possession, custody, or control of the University of California, Berkeley (UC Berkeley or the University) for the purposes of inspection and copying pursuant to the California Public Records Act, California Government Code § 7920.000 *et seq.* (CPRA), and Article I, § 3(b) of the California Constitution. The specific records being sought for inspection and copying—which pertain to the Turning Point USA event involving Rob Schneider on November 11, 2025—are listed below. As used herein, “Record” includes “Public Records” and “Writings” as those terms are defined at Government Code § 7920.530(a) & 7920.545.

Pursuant to California Government Code § 7920.000 *et seq.*, CAL requests access to inspect and copy the following records:



- **All planning, logistical, or operational documents** created by UC Berkeley’s UCPD, Campus Security & Event Operations, Apex Security Group, Student Affairs, Dean of Students Office, Risk Management, Berkeley Events & Conferences, or the Chancellor’s Office relating to the TPUSA event that occurred on November 11, 2025 at UC Berkeley featuring Rob Schneider (hereafter “TPUSA event”), including TPUSA event proposals, briefings, security plans, staffing plans, and ingress/egress plans prepared between August 1 and November 30, 2025.
- **All security assessments, threat assessments, risk analyses, and crowd-management plans** prepared by UC Berkeley personnel relating to the TPUSA event, including any policies or directives regarding access control, barricades, entrance management, or anticipated demonstrations.
- **All communications—including emails, text messages, encrypted messaging (e.g., Signal, WhatsApp), Teams/Slack/Google Chat messages, and memoranda**—sent or received by UCPD, Student Affairs, the Chancellor’s Office, Apex Security Group, Dean of Students, Public Affairs/Communications, Event Services, or Facilities Services, inclusive of those employed therein, that reference: “TPUSA,” “Turning Point,” “John Paul Leon”, “Rob Schneider,” “Schneider,” “Zellerbach”, “Frank Turek”, “Jobob Taeleifi”, “Trump”, “MAGA”, “protest,” “riot,” “blocked entrance,” “disruption,” or “event access” from August 1 to November 30, 2025.
- **All documents and communications concerning the decision by UC Berkeley personnel** to require tickets for the TPUSA event to be purchased using UC Berkeley’s ticketing system, <https://secure-tickets.berkeley.edu/events>.
- **All communications between UC Berkeley personnel and TPUSA, TPUSA’s student chapter, Rob Schneider or his representatives, or external event organizers** relating to event planning, security, access,



anticipated protests, or any changes to the planned operation of the TPUSA event.

- **All incident logs, dispatch logs, CAD logs, deployment orders, shift assignments, post instructions, use-of-force reports, and officer/security post-event summaries** relating to the TPUSA event, including any documentation of blocked entrances, crowd interference, or attendee access problems.
- **All video recordings** from UCPD body-worn cameras, fixed security cameras, or any mobile surveillance units covering the vicinity of the TPUSA event venue during the period when attendees were entering or attempting to enter.
- **All incident reports, arrest reports, Student Conduct reports, and after-action or post-event evaluations** prepared by UCPD, the Student Conduct Office, Risk Management, the Dean of Students Office, Apex Security Group, or any administrative unit regarding protests, disruptions, safety concerns, or barriers to the TPUSA event's access.
- **All policies, guidelines, or directives in effect during the TPUSA event** governing access to campus events, protest and demonstration rules, time-place-manner restrictions, outdoor sound amplification rules, or any temporary directives issued specifically for this TPUSA event.
- **All communications between UC Berkeley and external agencies**—including the Berkeley Police Department, Alameda County Sheriff's Office, Apex Security Group, city officials, or outside security contractors—regarding security planning, staffing, protest monitoring, or anticipated disruptions at the TPUSA event.
- **All complaints, reports, or communications received by UC Berkeley from attendees or members of the public** describing difficulty purchasing tickets for the TPUSA event, difficulty entering the TPUSA event, blocked access points, or interference by protesters, as well as any



internal communications documenting when UC Berkeley became aware of access problems.

- **All cost records, invoices, staffing summaries, or internal budgeting records** relating to security, staffing, or operational decision-making for the TPUSA event.
- **Any document, regardless of form, created, maintained, or stored by UC Berkeley** that relates to the planning, administration, security, access, disruption, or management of the TPUSA event.

If you contend that any portion of the records requested is exempt from disclosure by express provisions of law, Government Code § 7922.525 requires segregation and redaction of that material in order that the remainder of the records may be released. If you contend that any express provision of law exists to exempt from disclosure all or a portion of the records requested, Government Code § 7922.535(a) requires that you notify me of the reasons for the determination not later than 10 days from your receipt of this request.

These requests are for all writings and communications (including but not limited to, letters, electronic communications, e-mails, text messages, notes, memorandums, messages) whether or not those communications are stored in the University's files and/or servers or on personal devices / accounts such as private electronic mail accounts or cellular telephones.

Please be aware that Government Code § 7922.540 requires that any response to this request that includes a determination that the request is denied, in whole or in part, must be in writing and include the name and title of the person(s) responsible



for the University's response. In addition, Government Code § 7922.500 prohibits the use of the 10-day period, or any provisions of the CPRA or any other law, "to delay access for purposes of inspecting public records." Further, Government Code § 7922.600 requires agencies to assist a person making a request if they are having trouble with making a specific and effective request. This assistance includes helping the person identify records that would satisfy the purpose of the request; describing the agency's records, record keeping technology and locations of records; providing an index of records; and other suggestions for overcoming barriers to obtaining the records.

In responding to this request, please keep in mind that Article 1, § 3(b)(2) of the California Constitution expressly requires the University to broadly construe all provisions that further the public's right of access, and to apply any limitations on access as narrowly as possible. Pursuant to the CPRA's requirement that records be made "promptly available," Government Code § 7922.530(a), please produce responsive records on a rolling basis as they are located and reviewed, rather than waiting to compile all records before providing them. Do not delay partial production while other portions of the request are still being processed.

Under the CPRA, the University is required to deliver the information in whatever electronic format it is in no matter whether it is Excel, Word, WordPerfect or some other program or programs. Government Code § 7922.570 (a) & (b). CAL's request extends to receipt of this information in the electronic format your office



maintains these records in. Delivery of this information may be made by electronic mail (JDixon@libertycenter.org) or via a thumb drive. Please advise what electronic format these records are kept in.

In addition, if there are documents that satisfy this request that are in both electronic and paper formats, CAL is willing to receive the electronic version of those records and forgo inspection and potential photocopying of those paper copies. I hope that this will save all parties' time, trouble and expense. If you anticipate that data compilation, extraction, or programming will be required to satisfy a request (per Government Code § 7922.575 (b) (2)), please provide a written estimate and justification for same. For any records not capable of being delivered electronically, CAL elects to inspect these non-electronic records. Once CAL has had an opportunity to inspect these records, I will designate which documents we will wish to obtain copies of.

Finally, please note that an agency may not charge a requestor for the act of searching for documents or for review and redaction of any portion of a responsive document where the agency is claiming it is subject to an exemption or privilege.

If I can provide any clarification that will help expedite your attention to this request, please contact me at JDixon@libertycenter.org, pursuant to Government Code § 7922.600. Consistent with Government Code §§ 7922.530, 7922.540, and 7922.575, CAL agrees to pay only the direct costs of duplication, and not staff time,



search time, redaction time, or any costs beyond those expressly permitted under the CPRA. Please notify me in advance if the direct duplication costs will exceed \$100.

Sincerely,

A handwritten signature in blue ink, appearing to read "Josh Dixon".

Josh Dixon
Center for American Liberty

EXHIBIT ‘B’

Friday, April 10, 2026 at 11:59:28 AM Central Daylight Time

Subject: RE: PRA Request: Records re 1/1/10/2025 Event (Center for American Liberty)
Date: Friday, April 3, 2026 at 10:13:55 AM Central Daylight Time
From: Courtney Corbello (Liberty Center)
To: Josh Dixon (Liberty Center); UC Berkeley Public Records Office

Ms. Wong,

I am writing as a reminder that the deadline to respond to our public information request is set for next Thursday, April 9, 2026. While we have not yet received any response to our correspondence from you or your office, we remain hopeful that the requested documents will be provided within the designated time frame so that we can avoid any need for litigation.

Courtney Corbello
Counsel
Center for American Liberty
(703) 636-9959
www.libertycenter.org

From: Courtney Corbello (Liberty Center) <CCorbello@libertycenter.org>
Date: Tuesday, March 10, 2026 at 5:25 PM
To: Josh Dixon (Liberty Center) <JDixon@libertycenter.org>, UC Berkeley Public Records Office <pra@berkeley.edu>
Subject: RE: PRA Request: Records re 1/1/10/2025 Event (Center for American Liberty)

Ms. Wong,

I'm following up on our California Public Records Act request concerning records related to the Turning Point USA event at UC Berkeley on November 11, 2025. We submitted the request by email on January 9, 2026, and your office acknowledged receipt on January 16, 2026, advising that the request had been forwarded to the appropriate campus offices for searches and review.

At this point, we have been waiting for several weeks beyond the acknowledgment with no production and no concrete estimate for when records will be released. We understand CPRA responses can involve coordination across multiple campus units, but the absence of any production schedule or rolling release has effectively turned into an open-ended delay.

To move this forward, please provide (1) a written status update on where the searches and review currently stand, and (2) a firm production schedule. We are requesting that UC Berkeley begin producing responsive, non-exempt records on a rolling basis as they are located and reviewed, rather than holding everything for a single final release.

Unless UC Berkeley provides a production schedule and begins producing records within the next 30 days, we will pursue formal enforcement, including a petition for writ of mandate and

related relief to compel compliance under the CPRA.

Please confirm receipt of this message and let us know the anticipated date of the first production, along with the expected schedule for subsequent releases.

Courtney Corbello
Counsel
Center for American Liberty
(703) 636-9959
www.libertycenter.org

From: Courtney Corbello (Liberty Center) <CCorbello@libertycenter.org>
Date: Tuesday, February 24, 2026 at 5:25 PM
To: Josh Dixon (Liberty Center) <JDixon@libertycenter.org>, UC Berkeley Public Records Office <pra@berkeley.edu>
Subject: RE: PRA Request: Records re 11/10/2025 Event (Center for American Liberty)

Hello Ms. Wong,

Bringing our request back to the top of your inbox. Can you please let us know when we can expect responsive documents?

Courtney Corbello
Counsel
Center for American Liberty
(703) 636-9959
www.libertycenter.org



From: Josh Dixon (Liberty Center) <JDixon@libertycenter.org>
Date: Friday, February 13, 2026 at 4:40 PM
To: UC Berkeley Public Records Office <pra@berkeley.edu>
Cc: Courtney Corbello (Liberty Center) <CCorbello@libertycenter.org>
Subject: Re: PRA Request: Records re 11/10/2025 Event (Center for American Liberty)

Ms. Wong,

Good afternoon. I am writing to follow up on this request. Can you please give me an update?

Also, please copy Courtney Corbello (ccorbello@libertycenter.org), copied here, on all future correspondence on this request.

Thank you.

Josh Dixon, Esq.*
Vice President of Litigation
Center for American Liberty
(703) 687-6200

www.libertycenter.org

*Licensed in North and South Carolina

From: UC Berkeley Public Records Office <pra@berkeley.edu>
Date: Friday, January 16, 2026 at 7:33 PM
To: "Josh Dixon (Liberty Center)" <JDixon@libertycenter.org>
Subject: PRA Request: Records re 11/10/2025 Event (Center for American Liberty)

Dear Mr. Dixon:

This is to acknowledge your California Public Records Act (CPRA) request below. Your request has been forwarded to appropriate campus offices and a search for responsive documents is currently underway. Records identified as responsive to your request will be reviewed, and made available for your access, in accordance with relevant law and University policy.

Please note that there is no central repository for all University records. The identification and collection of potentially responsive records is only the first step in the CPRA response process. The collected records must be reviewed by this office to ensure that they are in fact responsive to your request and to assess whether any legal privileges or exemptions from disclosure are applicable and whether redactions may be required to protect individuals' rights to privacy. Please also bear in mind that we are concurrently fulfilling numerous other requests, many of which were received before yours and that we generally process requests in the order in which they are received. The current timeframe for fulfillment of most requests is ten weeks, although this may vary due to the nature and complexity of the request.

Although the requested records have not yet been fully identified, based on the terms of the request, we have made a preliminary determination that the request likely does seek disclosable records within the possession of the University. This office will provide you with a status update after the requested records have been thoroughly reviewed.

Regards,

Liane Wong
Director of Public Records Office

Public Records Office
University of California, Berkeley
[California Relay Service 711](#)

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

From: **Josh Dixon (Liberty Center)** <JDixon@libertycenter.org>

Date: Fri, Jan 9, 2026 at 2:59 PM

Subject: CPRA Request

To: pra@berkeley.edu <pra@berkeley.edu>

To whom it may concern,

Please see the attached CPRA request.

Sincerely,

Josh Dixon
Center for American Liberty
(703) 687-6200

www.libertycenter.org