



GASTÉLUM LAW

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March 24, 2026

Sent Via U.S. Certified Mail

Inglewood City Clerk
City Hall, 1 Manchester Blvd
Inglewood, CA 90301

**RE: DEMAND FOR PUBLIC RECORDS PURSUANT TO GOVT. CODE
Section 7920, ET. SEQ., (THE CALIFORNIA PUBLIC RECORDS ACT) &
PRESERVATION OF EVIDENCE DEMAND**

Our Client: Estate of Bryan Bostic
Date of Incident: March 10, 2026
Place of incident: Intersection of Hillcrest Boulevard & Nutwood Avenue;
400 block of East Hillcrest

To Whom it May Concern,

Please be advised that our law office represents the **Estate of Bryan Bostic** relating to a use of force incident involving **City of Inglewood (hereinafter also “CITY”) employees including Inglewood Police Department (hereinafter also “IPD”) police officers and BRYAN BOSTIC** which occurred on **March 10, 2026**. We are hereby formally requesting copies of any non-privileged investigation or incident reports that were generated as a result of the above referenced individual, **BRYAN BOSTIC**.

I am also requesting you to identify the names of any and all **City of Inglewood employees including Inglewood Police Department police officers** that were directly involved in **BRYAN BOSTIC’s** detention, use of force, and any other police contact on **March 10, 2026**. This request is being made pursuant to Section 7920, *et. seq.*, of the California Government Code (the California Public Records Act) and California Public Records Act precedent. *See Long Beach Police Officers Association v. City of Long Beach*, (2014) 59 Cal.4th 59.

Long Beach Police Officers Association v. City of Long Beach, (2014) 59 Cal.4th 59 held that public police agencies *are not* entitled to assert an exemption in the above-stated manner. Please note, the court affirmed in *Long Beach* that the California Public Records Act, Gov. Code, provides a fundamental and necessary right of every person in this state to gain access to public records held by state and local agencies.

The *Long Beach Police Officers Association* court further stated that a public entity cannot claim the name of an officer involved in an incident that resulted in a death of a civilian is protected from public disclosure by simply stating the information is protected from disclosure because the public interest in protecting officers from potential threats to their safety if their names were to be disclosed clearly outweighs any public interest in disclosure of the names. The court then ruled that the public entity must show that the officers are actually under threat, as opposed to mere speculation.

Here, unequivocally, the CITY must identify the peace officers or employees involved in the incident. There is no evidence of any nature showing that there is no justifiable legal reason to not disclose the identity of the peace officers or employees involved in the use of force incident relative to **BRYAN BOSTIC**. Therefore, I respectfully request that you honor this request in accordance with California law.

Furthermore, pursuant to Section 7922.525., *et. seq.*, of the California Government Code, we also request that the CITY provide all responsive documents in your agency's possession regarding the above-identified incident via electronic email or cloud link to our office. This should include copies of the following documents identified below:

1. Any footage pertaining to the incident including body worn video;
2. Any reports in any form including incident reports;
3. Medical records from any facility which treated **BRYAN BOSTIC**;
4. Communications from the family of **BRYAN BOSTIC**
5. Witness statements;
6. Audio tapes and transcriptions of radio communications related to the above-described incident.
7. Audio tapes and transcriptions of witness interviews;
8. Any other video recordings capturing the incident in any manner, including, but not limited to, cell phone videos and surveillance videos; and
9. Any other record in the broadest sense possible pertaining to the **March 10, 2026**, incident involving **BRYAN BOSTIC**.

Pursuant to Government Code Section 7922.535, you must respond to this Public Records Act Request within 10 days from the issuance of this demand. Pursuant to Government Code Section 7922.570, the CITY can provide all responsive documents in your agency's possession regarding the above-identified incident via electronic email or any online file storage such as a cloud link to our office.

Furthermore, pursuant to Penal Code Section 832.7 and the recent amendments of disclosable records through Senate Bill 1421, Assembly Bill 748, and Senate Bill 16, we hereby request all personnel records pertaining to **City of Inglewood employees including Inglewood Police Department police officers** who were involved in **BRYAN BOSTIC's** detention, use of force, and any other police contact on **March 10, 2026**. Notwithstanding Government Code Sections 7922.000, 7927.700, 7927.705, or any other law, the following peace officer or custodial officer personnel records and records maintained by a state or local agency shall not be confidential and

shall be made available for public inspection pursuant to the California Public Records Act and Penal Code Section 832.7:

(A) A record relating to the report, investigation, or findings of any of the following:

(i) An incident involving the discharge of a firearm at a person by a peace officer or custodial officer.

(ii) An incident involving the use of force against a person by a peace officer or custodial officer that resulted in death or in great bodily injury.

(iii) A sustained finding involving a complaint that alleges unreasonable or excessive force.

(iv) A sustained finding that an officer failed to intervene against another officer using force that is clearly unreasonable or excessive.

(B)(i) Any record relating to an incident in which a sustained finding was made by any law enforcement agency or oversight agency that a peace officer or custodial officer engaged in sexual assault involving a member of the public.

(C) Any record relating to an incident in which a sustained finding was made by any law enforcement agency or oversight agency involving dishonesty by a peace officer or custodial officer directly relating to the reporting, investigation, or prosecution of a crime, or directly relating to the reporting of, or investigation of misconduct by, another peace officer or custodial officer, including, but not limited to, any false statements, filing false reports, destruction, falsifying, or concealing of evidence, or perjury.

(D) Any record relating to an incident in which a sustained finding was made by any law enforcement agency or oversight agency that a peace officer or custodial officer engaged in conduct including, but not limited to, verbal statements, writings, online posts, recordings, and gestures, involving prejudice or discrimination against a person on the basis of race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, or military and veteran status.

(E) Any record relating to an incident in which a sustained finding was made by any law enforcement agency or oversight agency that the peace officer made an unlawful arrest or conducted an unlawful search.

Accordingly, pursuant to Penal Code Sections 832.7, this Public Records Act Request also seeks personnel requests records pertaining to any to **City of Inglewood employees including Inglewood Police Department police officers** who were involved in **BRYAN BOSTIC's** detention, use of force, and any other police contact on **March 10, 2026**, as requested above.

PRESERVATION OF EVIDENCE DEMAND

In light of the pending litigation, please preserve all documents and tangible things potentially relevant to the issues in this matter. No documents, in any form, relating to the litigation may be disposed of or destroyed.

I understand the Inglewood Police Department will be conducting an investigation of the circumstances surrounding the use of force incident involving IPD officers and BRYAN BOSTIC, and I write to ask that you preserve the following pieces of evidence:

1. All video footage captured by the Department's officers' body-worn cameras during the March 10, 2026 use of force incident involving IPD officers and BRYAN BOSTIC, including but not limited to footage capturing the initiation of the law enforcement contact with BRYAN BOSTIC, the interaction leading up to and including the use of force incident, and events occurring after the use of force incident until the cameras were turned off;
2. All video footage capturing this encounter, including but not limited to third-party surveillance cameras, and footage capturing the initiation of the law enforcement contact with BRYAN BOSTIC, the interaction leading up to and including the use of force incident, and the immediate aftermath of the use of force incident;
3. All video footage captured by any patrol car/unit that was equipped with camera equipment ("dash-cam") regarding the March 10, 2026, encounter with BRYAN BOSTIC;
4. All recordings of any emergency/911 phone calls that may have prompted the Inglewood Police Department to make contact with BRYAN BOSTIC on or about March 10, 2026;
5. All photographic, photometric, video, audio evidence taken from witnesses of the March 10, 2026, interaction between Inglewood Police Department police officers and BRYAN BOSTIC, including all cellphone or neighboring surveillance camera photos and videos, as well as witness statements taken during the investigation of the incident;
6. All records reflecting access by Inglewood Police Department personnel to, or viewing by Department personnel of, the above-described video(s), including but not limited to storage security and other access logs;
7. All Inglewood Police Department written documentation which identifies any interaction between Inglewood Police Department police officers and BRYAN BOSTIC on or about March 10, 2026 at or near Intersection of Hillcrest Boulevard & Nutwood Avenue, 400 block of East Hillcrest; this includes but is not limited to incident reports, memoranda, officer daily work sheets, or any other document as required by the Inglewood Police Department policies and procedures manual pertaining to police contact such as the one involving BRYAN BOSTIC on March 10, 2026;
8. All of the following relevant records, pursuant to California Penal Code § 832.7(b)(2), pertaining to the March 10, 2026 officer involved excessive force incident of BRYAN

BOSTIC:

- a. investigative reports;
- b. photographic, audio, and video evidence;
- c. transcripts or recordings of interviews;
- d. autopsy reports;
- e. all materials compiled and presented for review to the district attorney or to any person or body charged with determining whether to file criminal charges against an officer in connection with an incident, or whether the officer's action was consistent with law and agency policy for purposes of discipline or administrative action, or what discipline to impose or corrective action to take;
- f. documents setting forth findings or recommended findings; and
- g. copies of disciplinary records relating to the incident, including any letters of intent to impose discipline, any documents reflecting modifications of discipline due to the Skelly or grievance process, and letters indicating final imposition of discipline or other documentation reflecting implementation of corrective action.

In addition to preventing the destruction of physical evidence, you are also placed on notice that we consider electronically stored information (ESI) to be a valuable and irreplaceable source of discovery and evidence. The laws and rules prohibiting destruction of evidence equally apply to electronic data with the same force as they apply to other kinds of evidence. We intend to seek discovery of all ESI materials that refer or relate to the March 10, 2026 officer involved excessive force incident of BRYAN BOSTIC and any other contact with BRYAN BOSTIC and the IPD from March of 2016 to March of 2026 contained on the City of Inglewood's and/or the Inglewood Police Department's computers, computer networks, and third-party systems and any Cloud based technologies that contain responsive ESI. We expect that any potentially responsive ESI, including any Metadata, attachments to emails, or other related types of electronic information will be correctly preserved. For example, any of the City of Inglewood's and/or the IPD's employees/agents/officers' cellular telephones, text messaging services, Facebook pages, twitter sites, or other electronic media must be correctly preserved. The electronic form of these materials must be preserved because a hardcopy paper form of text derived from an electronic file does not preserve the totality of information that can be found within the electronic file, and therefore does not suffice to fully preserve the evidence.

Pending any discovery concerning the layout and configuration of applicable systems where ESI is stored by the City of Inglewood or associated entities, and pending any further agreement as to the preservation of electronic evidence, the following safeguards against destruction of evidence must be maintained until final resolution of the pending litigation occurs:

1. **Electronic data to be preserved and other preservation request.** The following types of electronic data should be preserved in accordance with the steps set forth in paragraphs 2-8 below:

- A. All calendar, scheduling, electronic mail, email attachments and meta data information about calendar, scheduling and email (including message contents, header information, and logs of electronic mail system usage) containing information that refers or relates to the March 10, 2026 use of force incident involving BRYAN BOSTIC and any other contact with BRYAN BOSTIC and the IPD from March of 2016 to March of 2026, including all Cloud computing accounts (such as personal email accounts, twitter accounts, Facebook accounts, etc.);
 - B. With respect to auto-delete and spam, steps should be taken and documented that describe preservation processes put in place to suspend or preserve potentially responsive ESI that may end up in an auto-delete or spam email;
 - C. All user created files contained on hard drives and/or networks. These files include but are not limited to Microsoft Office Documents (Word, Excel, Power Point) as well as PDF and any potentially responsive photos or videos or other types of documents that refer or relate to the March 10, 2026, use of force incident involving BRYAN BOSTIC and any other contact with BRYAN BOSTIC and the IPD from March of 2016 to March of 2026;
 - D. All databases (including all records and fields and structural information in such databases) containing any reference to or information about the March 10, 2026, use of force incident involving BRYAN BOSTIC and any other contact with BRYAN BOSTIC and the IPD from March of 2016 to March of 2026;
 - E. All logs of activity on computer systems that may have been used to process or store electronic data containing information that refers or relates to the March 10, 2026, use of force incident involving BRYAN BOSTIC and any other contact with BRYAN BOSTIC and the IPD from March of 2016 to March of 2026;
 - F. With respect to electronic data created by application programs that process photographs and videos.
2. **On-line data storage on servers, mainframes, and minicomputers.** With respect to on-line storage and direct access storage devices attached to your mainframe computers, servers, or mini computers: do not modify or delete any electronic data files existing at the time of this letter's delivery that meet the criteria set forth in paragraph 1 above, unless a true and correct copy of each such electronic data file has been made and steps have been taken to ensure that such a copy will be preserved and accessible

for the purposes of the discovery regarding or relating to the March 10, 2026 use of force incident involving BRYAN BOSTIC and any other contact with BRYAN BOSTIC and the IPD from March of 2016 to March of 2026.

3. **Off-line data storage, backups and archives, disks, tapes and other removal of electronic media.** With respect to all electronic media used for off-line storage, including magnetic tapes and cartridges, CDs and DVDs, hard drives, flash memory devices, and other media, which, at the time of this letter's delivery, contained any electronic data meeting the criteria listed in paragraph 1 above: cease any activity that may result in the loss of such electronic data, including rotation, destruction, overriding, or erasure of such media in whole or in part. This request is intended to cover all removable electronic media used for data storage in connection with your computer systems, including magnetic tapes and card strips, CDs and DVDs, hard drives, flash memory devices, and all other media, whether used with personal computers, servers, minicomputers, or mainframes or other computers, and whether containing back up, or archived data sets and other electronic data, or all of your computer systems.
4. **Replacement of data storage devices.** Do not dispose of any electronic data storage devices or media that may be replaced due to failure, upgrade, or others that may contain electronic data meeting the criteria listed in paragraph 1 above.
5. **Fix drives on stand-alone personal computers and network stations.** With respect to electronic data meeting the criteria listed in paragraph 1 that existed on fixed drives attached to stand-one micro computers or network work stations at the time of this letter's delivery: do not alter or erase such electronic data, and do not perform other procedures (such as data compression and disk defragmentation or optimization routines) that may impact such data, unless a true and correct copy has been made of such active files and of completely restored versions of such deleted electronic files and file fragments, copies have been made of all directory listings (including hidden files) for all directories and sub-directories containing such files, and arrangements have been made to preserve copies during the pendency of the alleged claims in the complaint.
6. **Digital recording equipment and surveillance video.** As it relates to video footage captured by digital recording equipment, including surveillance cameras, the City of Inglewood must preserve all data captured by any such device. The Department must preserve and maintain logs documenting who viewed the video evidence, when the video evidence was viewed, whether the video evidence was downloaded at the time of viewing and if so information regarding the server system or device the video

evidence was downloaded to.

7. **Other potentially responsive ESI.** In addition to the preservation obligations mentioned already, the City of Inglewood should also take steps to ensure that no data loss occurs from recycling computers, re-provisioning servers, re-configuring applications or otherwise managing data created by custodians over the course of this matter. These steps should include preserving data for custodians who accessed or created ESI including, but not limited to, the City of Inglewood, its employees/agents/officers, and other third parties, as well as, IT and records custodians.
8. **Evidence created subsequent to this letter.** With regard to electronic data created subsequent to the date of delivery of this letter, relevant evidence should not be destroyed and the City of Inglewood should take whatever steps are appropriate to avoid destruction of evidence.

The above evidence is important to the claims which BRYAN BOSTIC will make against the Inglewood Police Department. It is important that this evidence be preserved for use by the family of BRYAN BOSTIC. If in the course of your investigation into the matter you should need to undertake any testing of any of the evidence, we ask that you allow us to be present to record the testing and the outcome of the testing. Likewise, if you intend to do away with or otherwise destroy any of the above evidence, I ask that you contact me immediately so that I might make arrangements to take custody of it.

If I can provide any additional information that will expedite your processing of our request, please do not hesitate to contact me at (213) 340-6112 or by email at dgastelum@gastelumfirm.com.

Your cooperation is greatly appreciated.

Very Truly Yours,

GASTÉLUM LAW, APC


DENISSE O. GASTÉLUM