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7 **Local Counsel for Plaintiff**
8 **NATIONAL RIGHT TO WORK LEGAL DEFENSE FOUNDATION, INC.**

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNT OF LOS ANGELES**

11 **NATIONAL RIGHT TO WORK**
12 **LEGAL DEFENSE FOUNDATION**
13 **INC.,**

14 **Plaintiff,**

15 **v.**

16 **UNIVERSITY OF CALIFORNIA AT**
17 **LOS ANGELES and UNIVERSITY OF**
18 **CALIFORNIA BOARD OF**
19 **REGENTS,**

20 **Defendants.**

Case No: _____

**COMPLAINT FOR DECLARATORY
RELIEF**

[California Constitution Article I § 3,
Gov't Code § 7920.000, *et seq.*; Civ. Proc.
Code §§ 1060, 1085]

21 **INTRODUCTION**

22 1. This is an action to obtain public records under the California Public Records
23 Act ("CPRA"). The UNIVERSITY OF CALIFORNIA AT LOS ANGELES ("UCLA") and
24 THE UNIVERSITY OF CALIFORNIA BOARD OF REGENTS (the "Board"), (together,
25 the "Defendants") are illegally withholding public records long past statutory deadlines,
26 without justification, without citing a single exemption, and in violation of the CPRA.
27 On August 18, 2025, Plaintiff NATIONAL RIGHT TO WORK LEGAL DEFENSE

1 FOUNDATION, INC. (“Plaintiff” or “NRTWF”) submitted separate requests for public
2 records to UCLA for records reflecting the Defendants’ 2024 Private Equity Research
3 Strategy Conference and Defendants’ 2018-2024 Strategic Labor Research Conferences
4 (collectively, the “Requests”). True and correct copies of each request are attached as Exhibits
5 1 and 2, respectively. Although Defendants purported to produce records on November 7,
6 2025, that production consisted mostly of publicly available materials that have marginal
7 relevance to Plaintiff’s requests. Nearly three months have passed since Plaintiff’s submission,
8 and Defendants have still failed to produce any substantive, —responsive records as required
9 by law. The CPRA requires that an agency produce records responsive to a request made by a
10 member of the public promptly, and Defendants’ conduct constitutes an unlawful and bad-
11 faith delay in violation of this statutory duty.
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14 2. Relief is required because Respondents continue to disregard their obligations
15 under the CPRA. Through their unjustified delay, Respondents have denied Petitioner access
16 to responsive public records without legal basis. Therefore, by this Complaint (“Complaint”)
17 and pursuant to the Code of Civ. Proc. §§ 1085, *et seq.* and Cal. Gov. Code §§ 7920.000, *et seq.*,
18 Plaintiff now respectfully asks this Court to issue a declaration that the records sought are
19 non-exempt and subject to mandatory disclosure, pursuant to the CPRA.¹
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25 ¹ Unless otherwise stated, all references to code sections are to the California Government
26 Code.

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JURISDICTION AND VENUE

3. This Court has jurisdiction under Gov't Code §§ 7923.000, 7923.100, Code of Civ. Proc. § 1085, and Article VI, Section 10 of the California Constitution.

4. Venue is proper in this Court. The Records in question, or some portion of them, are situated in the County and City of Los Angeles, Gov't Code § 7923.105; the acts or omissions complained of occurred in the County of Los Angeles, Code of Civ. Proc. § 393; and, at least one of the Defendants, UCLA, is located in the County of Los Angeles, Code of Civ. Proc. § 395.

PARTIES

5. The National Right to Work Legal Defense Foundation, Inc., is a nonprofit, charitable organization whose mission is to eliminate compulsory unionism abuses through litigation, public information, and education programs. NRTWF is a member of the public pursuant to §§ 7920.515-7920.520.

6. The University of California at Los Angeles is a public institution and agency within the meaning of §§ 7920.510, 7920.5125(a).

7. The University of California Board of Regents is a public entity and agency within the meaning of §§ 7920.510, 7920.5125(a). The Board is subject to suit pursuant to Article IX, Section 9 of the California Constitution. The Board is the highest administrative authority of the University of California with exclusive power to operate, control, and administer the university. (*In re Work Uniform Cases* (2005) 133 Cal.App.4th 328, 343.)

STATEMENT OF FACTS

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2 8. On August 18, 2025, Plaintiff delivered to the Defendants CPRA requests for
3 records concerning the University’s Labor Studies Program, the 2024 UCLA Strategic Labor
4 Research Conference, and the 2018-2023 UCLA Strategic Labor Research Conferences. The
5 requests included, without limitation, all documents presented, distributed, or used at the
6 conference itself and any recordings of the presentation. The requests included any draft
7 materials, any communication relating to the materials or the conferences, and any lists of
8 presenters or participants. (Request No. 25-5864)²
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11 9. On August 18, 2025, Plaintiff delivered to the Defendants a CPRA request for
12 records concerning the University’s Private Equity Research Strategies conference. The
13 requests included, without limitation, all documents presented, distributed, or used at the
14 conference itself and any recordings of the presentation. The requests included any draft
15 materials, any communication relating to the materials or the conferences, and any lists of
16 presenters or participants. (Request No. 25-5865)³
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18 10. The Requests identified above are substantially identical to requests submitted
19 to Defendants by Cogency Global, Inc., in January 2025, (Request No. 25-4963), and again in
20 February 2025 (Request Nos. 25-4855 and 4963) (together, the “Cogency Requests.”).
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23 _____
24 ² Internet pages promoting these conferences have been taken down by Respondents upon
receipt of CPRA requests for information.

25 ³ Internet pages promoting these conferences also have been taken down by Respondents
26 upon receipt of CPRA requests for information.

1 Defendants thus have been working on, or should have been working on, collecting
2 documents responsive to Plaintiff’s requests since January 2025.

3 11. On August 29, 2025, Defendants informed Plaintiff by emailed letters that
4 UCLA “will respond to your request no later than the close of business on September 11,
5 2025, with an estimated date that responsive documents will be made available.”
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7 12. On September 11, 2025, Defendants informed Plaintiff by emailed letters that
8 “UCLA Information Practices (IP) continues to work on your public records requests dated
9 August 18, 2025” and that “the estimated date that responsive documents will be made
10 available to you . . . is October 31, 2025.”
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12 13. On October 21, 2025, Plaintiff emailed Defendants a litigation hold letter and
13 a letter requesting information concerning Defendants’ efforts at compliance with CPRA. The
14 second letter requested a summary of the CPRA compliance efforts Defendants have
15 undertaken, including:
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- 17 a. Implementing the hold letter.
 - 18 b. Search and collection protocols.
 - 19 c. Review of workflows.
 - 20 d. Time and activity records.
 - 21 e. Communications relevant to compliance with CPRA.
 - 22 f. Approximate costs to be passed on to Plaintiff.
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1 14. On October 31, 2025, Defendants again failed to meet their own self-imposed
2 deadline for responding to Plaintiff’s CPRA requests. That evening, at 8:31 p.m., Defendants
3 informed Plaintiff by email that “we must revise the estimated availability date regarding your
4 attached request, as the requisite review has not yet been completed. We expect to provide our
5 response by November 25, 2025.”
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7 15. On November 5, 2025, prior to any further production, Plaintiff emailed a letter
8 to Defendants reiterating Defendants’ failure to substantively respond to Plaintiff’s CPRA
9 requests and to Plaintiff’s October 21, 2025, letters requesting information about Defendants’
10 compliance efforts.
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12 16. On November 7, 2025, Defendants produced what they claimed as “responsive
13 documents.” In reality, the production consisted almost entirely of publicly available municipal
14 financial reports—such as annual comprehensive financial statements for cities including Bell
15 Gardens—as well as scattered travel itineraries, a handful of generic policies concerning
16 honoraria, and a short video taken at a conference covered by Plaintiff’s CPRA request. These
17 documents appear unrelated to the conference presentations, research materials, attendance
18 lists, expense reports, or communications sought by Plaintiff and Defendants proffered no
19 explanation why such published municipal materials were somehow responsive. This
20 purported “production” was a defiant demonstration of noncompliance while obscuring the
21 absence of responsive records and increasing Plaintiff’s costs of enforcement.
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1 17. Defendants’ November 7, 2025 “responsive documents” production, however,
2 inadvertently disclosed a cache of existing and withheld responsive documents. A short video
3 clip captured one or more PowerPoint responsive documents presented at a conference clearly
4 covered by Plaintiff’s request. Further, that same short video clip chronicled a conference
5 speaker announcing he had worked planning the conference for a year beforehand. That
6 announcement suggests a year of such planning would generate many planning documents,
7 including emails and other stored electronically and in hard copy. Yet further, the short video
8 clip likely taken for social media posting and influencer distribution panned a room full of
9 attendees and captured attendees with name tag identifications clearly generated by registration
10 and attendance documentation Plaintiff specifically requested. Such a sophisticated marketing-
11 style influencer video clip suggests it is a highlight edited from a far more extensive video or
12 series of videos covering the full conference, a common contemporary academic practice of
13 covering conferences and other academic events to allow remote attendees and others to share
14 papers presented and points exchanged.
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18 18. It is now reasonable to infer from Defendants’ conduct that they have no
19 intention of complying with the CPRA and instead intend to continue their pattern of serial
20 delay. Defendants have failed to provide any substantive records, ignored Plaintiff’s request
21 for information concerning their compliance efforts to date, and disregarded Plaintiff’s
22 litigation-hold letter. Their November 7 production—consisting mostly of irrelevant, publicly
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1 available materials—further confirms that Defendants’ purported “review” process is
2 pretextual and conducted in bad faith.

3 19. Defendants’ conduct is especially inexcusable when they had been processing
4 identical public records requests for fully six months before Plaintiff’s submission and ten
5 months to date.
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7 20. Given that Plaintiff’s CPRA requests are identical to those submitted by
8 Cogency Global, Inc. in January 2025, as Defendants confirmed in their November 7, 2025,
9 production of six seemingly irrelevant published municipal budgets and five travel reports, a
10 grand total of eleven documents after ten months of delay, Defendants’ refusal to produce
11 responsive documents makes clear that, absent this Court’s intervention, Defendants will not
12 comply with their obligations under the CPRA.
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15 **VIOLATION OF CALIFORNIA CONSTITUTION**

16 21. Plaintiff incorporates herein by reference the preceding paragraphs of this
17 complaint.
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19 22. The California Constitution provides an independent right of access to
20 government records: “The people have the right of access to information concerning the
21 conduct of the people’s business, and, therefore, the meetings of public bodies and the writings
22 of public officials and agencies shall be open to public scrutiny.” Cal. Constitution, Art. 1 §
23 3(b)(1). This provision was adopted by the voters in 2004 because, as the ballot argument
24 supporting the measure states, when Californians asked questions of their government, they
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1 increasingly found “that answers are hard to get.” The constitutional provision is intended to
2 reverse that trend.

3 23. Defendants’ failure to provide all disclosable records in response to Plaintiff’s
4 requests is in violation of Article 1, Section 3(b) of the California Constitution.
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6 **COMPLAINT FOR DECLARATORY RELIEF**
7 **PURSUANT TO THE CALIFORNIA PUBLIC RECORDS ACT**

8 24. Plaintiff incorporates herein by reference the preceding paragraphs of this
9 petition.

10 25. The CPRA expressly provides that “access to information concerning the
11 conduct of the people’s business is a fundamental and necessary right of every person in this
12 state.” (§ 7921.000) (*CBS, Inc. v. Block* (1986) 42 Cal.3d 646, 651.)
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14 26. Under the CPRA all records that are prepared, owned, used, or retained by any
15 public agency and that are not subject to the CPRA’s statutory exemptions to disclosure must
16 be made publicly available for inspection and copying upon request. §§ 7922.525(a)-(b). There
17 is a “statutory presumption that all governmental records are available to any person” unless
18 the agency demonstrates that nondisclosure is statutorily permitted. (*ACLU v. Superior Court*
19 (2011) 202 Cal.App.4th 55, 85; Gov. Code, § 7922.000, subd. (a).)
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21 27. The law requires that agencies make non-exempt public records available to
22 requesters “promptly.” § 7922.530(a). Delaying or obstructing production of public records is
23 unlawful. (§ 7922.500.)
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1 33. By their conduct in this case, Defendants have obstructed access to public
2 records. Defendants are defying transparency and accountability by sending a series of
3 delaying communications to the Plaintiff. The CPRA is predicated on the principle that:

4 Openness in government is essential to the functioning of democracy. Implicit
5 in the democratic process is the notion that government should be accountable
6 for its actions. In order to verify accountability, individuals must have
7 access to government files. Such access permits checks against the
8 arbitrary exercise of official power and secrecy in the political process.

9 (*Int'l Fed. of Professional & Technical Engineers, Local 21, AFL-CIO v. Superior Court* (2007)
42 Cal.4th 319, 328–329.)

10 34. Declaratory relief is warranted to address Defendants' serial violations of the
11 CPRA, including the duty to provide disclosability and a legitimate estimated date of
12 production within statutory time limits.

13 35. Plaintiff has fulfilled all of the prerequisites to declaratory relief. Exhaustion of
14 remedies is not a condition precedent to a show cause order or declaratory judgment pursuant
15 to the CPRA. (§ 7921.000).

16 36. An actual controversy exists between the Plaintiff and the Defendants
17 concerning whether Defendants have met their statutory duties pursuant to the CPRA.
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20 **PRAYER FOR RELIEF**

21 WHEREFORE, Plaintiff prays for judgment as follows:

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23 1. In favor of Plaintiff and against the Defendants;
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- 1 2. For a declaration that Plaintiff's request seeks records subject to mandatory
2 disclosure; that Plaintiff's request imposed a duty upon Defendants promptly to
3 provide public records in response; that Defendants failed that duty by withholding
4 records while providing evasive and misleading reasons for their failure; and that
5 Defendants' conduct denying access to disclosable public records violates the CPRA;
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7 3. For Plaintiff to be awarded reasonable attorneys' fees and costs; and
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9 4. For such other and further relief as the Court deems proper.

10 DATE: November __, 2025

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11 By: /s/_____

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