

FORMAL SUPPLEMENTAL COMPLAINT & EVIDENTIARY TRANSMITTAL

BEFORE THE SAN JOAQUIN COUNTY CIVIL GRAND JURY

SUBMISSION VIA EMAIL: civilgrandjury@sjcourts.org | grandjury@sjcourts.org
PHYSICAL ADDRESS: 180 E. Weber Avenue, 4th Floor, Stockton, CA 95202
DATE OF FILING: September 18, 2026

COMPLAINANT: Victoria Cortez (Parent, Resident)
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RESPONDENT ENTITY: City of Lathrop (City Administration, Public Works Department, City Council)
SUBJECT MATTER: Municipal Data Concealment, False Dais Testimony (Brad Taylor), Defective Sensor Placement, and Disparate Municipal Safety Resource Allocation.

LEGAL DISCLAIMER & CAPACITY STATEMENT:

This supplemental complaint is submitted by Victoria Cortez solely in her individual capacity as a private resident, parent, and constituent exercising rights under the First Amendment of the United States Constitution and California Penal Code § 914 et seq. While Complainant serves in public governance leadership roles, zero public agency funds, staff, or resources are utilized. Factual references to surrounding neighborhood roadway networks and school walking corridors are included strictly for objective geographic, engineering, and pedestrian foot-traffic analysis under Cal. Gov. Code § 835 and the California Safe Routes to School (SR2S) Framework.

I. STATUTORY JURISDICTION & PRIOR PROCEEDINGS

Pursuant to California Penal Code §§ 914.1 and 925a, this Supplemental Complaint expands upon Complainant's comprehensive **Actual Notice Binder** and Citizen Complaints previously submitted following direct investigative consultations with **San Joaquin County District Attorney Senior Investigator Robert Fine**. This filing incorporates newly verified empirical telemetry and written admissions from City of Lathrop officials confirming intentional data distortion and disparate safety resource allocation.

II. STATEMENT OF FACTS & ESCALATING ADMINISTRATIVE FAILURES

- 1. Sworn False Testimony by Public Works Director (Sept 14, 2026):** During the regular City Council meeting on September 14, 2026 [Broadcast at 01:10:54 – 01:14:10], Public Works Director / City Engineer Brad Taylor testified under official oath that vehicular speeds along Autumn Rain Drive were 'very low, 15 to 18 miles per hour' and that the narrow roadway is 'naturally traffic calming.' On this basis, Public Works opposed immediate safety mitigations and recommended postponing further action.
- 2. Written Admission of Fabricated Testimony (Sept 16, 2026):** In response to Complainant's formal CPRA demand and legal objection, Director Taylor transmitted a formal written admission conceding: 'The average speeds that I stated during the Council Meeting were based on my recollection of actual data collected and were approximate.'
- 3. Forensic Telemetry Audit Confirms 57.3 MPH Speeding:** Upon auditing the City's raw dataset (Raw Data.xlsx), Complainant uncovered conclusive proof of extreme speeding: Autumn Rain Drive recorded a maximum speed of **57.3 MPH** (Sept 3, 2026 at 19:59:17) with **129 speeding violations** (>25 mph). Crescent Moon Way recorded a maximum speed of **51.4 MPH** with **192 speeding violations**.
- 4. Flawed Geometric Sensor Placement:** Public Works telemetry GPS coordinates (37.803159, -121.302985) prove pneumatic tubes were deployed at the **Stone Cellar Way curve** east of 331 Autumn Rain Drive during active PG&E; construction, entirely omitting the straightaway acceleration zone between McKee Blvd and Pheasant Downs Road.
- 5. Disparate Safety Resource Allocation:** On the official Sept 14 record, Public Works confirmed that **River Islands** crosswalk beacons were 'in stock, ready in 1 to 2 weeks' [01:13:53], and **Band Lane** speed humps were being installed in '2 to 3 weeks' [02:11:47]. Meanwhile, Mossdale Elementary children were subjected to an arbitrary 60+ day delay pushed to late November (past the municipal election).

III. INDEX OF FORMAL SUPPLEMENTAL EVIDENCE & EXHIBITS

Exhibit #	Document Title / Description	Format / Size	Source Agency / Verification
Exhibit 1	City of Lathrop Speed Study Raw Telemetry (Autumn Rain, Crescent Moon, Pheasant Downs, Mill Stone)	XLSX / 606 KB	City of Lathrop Public Works (CPRA Production)
Exhibit 2	Public Works Autumn Rain Drive Certified Speed Report (Sept 2026)	PDF / 746 KB	City of Lathrop Public Works Department
Exhibit 3	Public Works Crescent Moon Way Certified Speed Report (Sept 2026)	PDF / 770 KB	City of Lathrop Public Works Department

Exhibit 4	Brad Taylor Written Email Admission (Dais Testimony Was Approximate Recollection)	EML / 42 KB	City Public Works Director Brad Taylor
Exhibit 5	Complainant Formal Forensic Sur-Reply & Cal. Gov. Code § 835 Legal Notice	PDF/MD / 14 KB	Victoria Cortez / Served on City Council & City Attorney
Exhibit 6	Dismal Freedom Press Public Investigation Dossier (URL: dismalfreedom.press/mosssdale-speed-audit.html)	HTML / Live	Dismal Freedom Press Public Integrity Desk

IV. FORMAL INVESTIGATIVE REQUESTS TO THE GRAND JURY

The San Joaquin County Civil Grand Jury is respectfully requested to:

1. Investigate the City of Lathrop Public Works Department's methodology for collecting, analyzing, and reporting traffic telemetry on residential school corridors.
2. Inquire into sworn representations made by municipal department heads to the City Council that contradict verified empirical datasets.
3. Examine whether the disparate safety allocation between River Islands and Mosssdale Elementary constitutes discriminatory municipal administration.

V. VERIFICATION & DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury under the laws of the State of California that the foregoing statements and attached exhibit summaries are true and correct to the best of my knowledge and belief.

Dated: September 18, 2026

Location: Lathrop, California

/s/ Victoria Cortez

Victoria 'Torie' Cortez

Complainant, Parent & Community Traffic Safety Advocate

331 Autumn Rain Drive, Lathrop, CA 95330 | (209) 305-0823