



KNOW WHAT IS IN YOUR FILE: Court Orders Full Disclosure of Brady Materials in Personnel Records

Schneider v. Superior Court of Los Angeles County

Overview: A recent California appellate decision has clarified how courts must handle *Brady* material found in peace officers' personnel records—and the ruling has major implications for how your file may be disclosed in a criminal case.

The Case: Robert Schneider was charged with murder and sought discovery under *Pitchess* and *Brady*, asking the court to review confidential personnel records of six Los Angeles County Sheriffs (LASD) deputies. After an in-camera review, the trial court agreed that four deputies' files contained *Brady* material but only ordered disclosure of the names, addresses, and phone numbers of people who had witnessed or complained about the conduct, rather than the *Brady* material itself (i.e. not the actual documents, reports, or recordings).

Schneider challenged the limited disclosure—and the appellate court agreed with him.

The Ruling: In *Schneider v. Superior Court of Los Angeles County*, (Cal.Ct.App.2025) the appellate court found that when a court finds *Brady* material in a peace officer's personnel file, it must disclose all of it, not just witness contact information. Disclosure includes written documents, internal reports, audio or video recordings and any material favorable to the defense and material to guilt or punishment.

The Court made two key points: When a trial court conducts a judicial review of an officer's personnel file for *Brady* discovery, it is essentially executing the prosecution's *Brady* duty and must disclose any *Brady* material it uncovers.

1. Which means, *Brady* disclosure is not limited by *Pitchess*. While *Pitchess* provides the procedural gateway to access confidential personnel records, it does not limit the scope of *Brady*-required disclosures once that gate is opened.
2. The court acts on behalf of the prosecution. When conducting an in-camera review, the judge is fulfilling the State's constitutional obligation to turn over exculpatory evidence. That means full *Brady* compliance is required.

What this Means for Officers: Once your file is subject to an in-camera *Pitchess* review, any material deemed favorable to the defense must be turned over- without redaction or limitation.

This ruling underscores the importance of maintaining integrity and professionalism in every encounter, as they may result in discovery.



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The Department should ensure legal teams are coordinated with prosecutors on potential *Brady* disclosures.

Key Takeaway: If it's in your file and it's *Brady*—it's getting disclosed. This decision reinforces the need for all officers to understand how personnel records intersect with Constitutional discovery obligations.

Stay Safe and Stay Informed!

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