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MARCH 27, 2024

RE: ATNIGHT MEDIA *et al.* v. LOS ANGELES POLICE DEPARTMENT
CALIFORNIA PUBLIC RECORDS ACT § 6250 ET SEQ.

**CALIFORNIA CHILD EXPLOITATION INVESTIGATIONS AND
PREVENTION REQUEST FOR INFORMATION RELATED TO
NICKELODEON STUDIOS AND THE WALT DISNEY COMPANY**

Pursuant to the California Public Records Act § 6250 et seq., I, Nik Hatziefstathiou, on behalf of AtNight Media and One World, request access to and copies of records from the Los Angeles Police Department (the "LAPD") that oversee the jurisdiction covering 1040 North Las Palmas Avenue, Los Angeles, California, the site of Sunset Las Palmas Studios (formerly known as General Service Studios and Hollywood Center Studios).

I. REQUEST & SCOPE:

Records related to investigations, allegations, and actions taken concerning misconduct associated with the Nickelodeon television network, as highlighted in the docuseries "Quiet On Set" and other related reports. This request includes, but is not limited to, the following:

1. Arrest Reports, Investigation Files, and Notes: Documents detailing arrests, investigations, and notes concerning misconduct at Nickelodeon and Disney, specifically involving Brian Peck, Jason Handy, Dan Schneider, and any individuals associated with similar allegations.
2. Execution of Search Warrants: Records on the execution of search warrants at properties associated with accused individuals from Nickelodeon and Disney, including findings and evidence collected.
3. Communications Between Nickelodeon, Disney, and Law Enforcement: Correspondence (emails, letters, recorded calls) between executives or producers

from Nickelodeon and Disney and law enforcement concerning misconduct allegations.

4. Interview Transcripts and Witness Statements: Transcripts or summaries of interviews related to alleged misconduct within Nickelodeon and Disney, involving victims, witnesses, and accused parties.

5. Complaints and Tips: Records of complaints or informal reports hinting at potential misconduct at Nickelodeon and Disney, particularly non-actionable tips that may indicate patterns of behavior.

6. Surveillance and Security Footage: Any relevant footage from studios that could be pertinent to the investigations of the allegations.

7. Interagency Collaboration Documents: Records of collaborations or communications with other law enforcement agencies regarding the individuals and incidents under investigation at both Nickelodeon and Disney.

8. Protective and Restraining Orders: Information on protective or restraining orders issued in relation to the allegations at Nickelodeon and Disney.

9. Public Alerts and Warnings: Documentation of alerts or warnings issued by police to the community or industry regarding the involved individuals from Nickelodeon and Disney.

10. Educational and Preventive Measures: Information on seminars, training sessions, or educational materials produced in response to these incidents, aimed at preventing similar cases of abuse within the industry.

11. Calls for Service: Detailed records of Calls for Service to the Disney Companies or associated entities, including Nickelodeon, from January 1, 2007, to January 1, 2017.

12. Email Communications: All emails sent or received by the LAPD concerning sexual assaults linked to the Disney Companies or Nickelodeon from January 1, 2007, to the present, focusing on emails with keywords “assault”, “Disney”, and “Nickelodeon”.

13: Records Concerning Specific Individuals: Detailed records from January 1, 2005, to January 1, 2012, related to the following individuals, including their involvement

as actors, witnesses, victims, or in any named capacity, along with their birthdates for precise identification:

- (a) Brian Richard Peck (born July 29, 1960)
- (b) Danny Kallis (born March 13, 1957)
- (c) Jim Geoghan
- (d) Dylan Thomas Sprouse (born August 4, 1992)
- (e) Cole Mitchell Sprouse (born August 4, 1992)
- (f) Brenda Song (born March 27, 1988)
- (g) Ashley Michelle Tisdale (born July 2, 1985)
- (h) Deborah Ann Ryan (born May 13, 1993)
- (i) Woodrow "Woody" Fink (Matthew Timmons)
- (j) Larramie Cortez "Doc" Shaw (born April 24, 1992)
- (k) Jennette McCurdy (born June 26, 1992)
- (l) Miranda Cosgrove (born May 14, 1993)
- (m) Amanda Bynes (born April 3, 1986)
- (n) Nathan Kress (born November 18, 1992)
- (o) Drake Bell (born June 27, 1986)
- (p) Elizabeth Gillies (born July 26, 1993)
- (q) Ariana Grande (born June 26, 1993)
- (r) Victoria Justice (born February 19, 1993)
- (s) Danielle Monet (born March 1, 1989)
- (t) Allison Scagliotti (born September 21, 1990)
- (u) Emma Roberts (born February 10, 1991)
- (v) Vanessa Hudgens (born December 9, 1988)
- (w) Christina Kirkman (born February 25, 1993)
- (x) Kenan Thompson (born May 10, 1978)
- (y) Kel Mitchell (born August 25, 1978)
- (z) Jamie Lynn Spears (born April 4, 1991)
- (aa) Giovonnie Samuels (born 1985)
- (ab) Alisa Reyes (born February 3, 1981)
- (ac) Nick Cannon (born October 8, 1980)
- (ad) Jules LeBlanc (born December 5, 2004)
- (ae) Debby Ryan (born May 13, 1993)
- (af) Zoey Deutch (born November 10, 1994)
- (ag) Selena Marie Gomez (born July 22, 1992)
- (ah) Demetria Devonne "Demi" Lovato (born August 20, 1992)

14. Tips to Law Enforcement Related to Child Exploitation at Nickelodeon and Disney: Any complaints or tips related to misconduct, documents detailing collaboration with other law enforcement, any protective or restraining orders issued, and if any seminars or educational materials were created in response to these incidents.

II. II. PUBLIC INTEREST

The docuseries "Quiet On Set" delves into the misconduct by individuals like Brian Peck, a former dialogue coach and on-camera talent, and Jason Handy, a production assistant. Both were highlighted for their predatory behaviors towards minors on set. Brian Peck's criminal activities and subsequent arrest in 2003 for sexual abuse charges, including the abuse of Drake Bell, are significant points of focus. Jason Handy's arrest followed an investigation that found incriminating evidence at his home, including thousands of images of children and emails exchanged with minors that had sexually explicit content.

Allegations of a toxic work environment under Dan Schneider's direction, including sexism, racism, and abuse, were prominent. Specific instances involving mistreatment of female writers and actors, as well as racial insensitivity, were noted. The experiences of those like Drake Bell, who disclosed his abuse by Peck, shed light on the broader issues of misconduct and exploitation within Nickelodeon and its associated productions.

Brian Peck's arrest in August 2003, and the subsequent sentencing and registration as a sex offender in 2004, are critical. The shift of "The Amanda Show" to Nickelodeon on Sunset, where Drake Bell encountered Brian Peck, marks a significant location and period.

The fallout from these revelations, including the responses from Nickelodeon and those implicated, and the broader impact on the victims and the entertainment industry, could be important for understanding the full scope of the situation.

III. NEWS MEDIA

AtNight Media is a recognized representative of the news media, primarily engaged in disseminating information to the public. Should parts of this request be unclear, too broad, or if you require further details, please contact me instead of denying the request. I am willing to discuss adjustments to the scope to facilitate the fulfillment of this request.

Additionally, if certain details within the records are exempt from disclosure by law, I kindly request that the department provide the releasable portions of the records with the exempted information redacted, rather than denying the entire request. attention to this matter.

AtNight Media is a representative of the news media and is primarily engaged in the dissemination of information to the public. This request is of considerable public interest rest as it will contribute significantly to the public's understanding of the interactions between the Los Angeles Police Department and major television studios.

Warm regards,

/s/ Nik T. Hatziefstathiou
NIK TZIMAS HATZIEFSTATHIOU

Dated: March 27, 2024