

FILED / ENDORSED

FEB 17 2026

By L. Chen-Knapp, Deputy Clerk

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SUPERIOR COURT OF CALIFORNIA

COUNTY OF SACRAMENTO

KELLEY and DENIS O'SULLIVAN, in
their Individual Capacity and KELLY
O'SULLIVAN as Administrator of the Estate
of TARA O'SULLIVAN, Deceased,

Plaintiffs,

vs.

GHOST GUNNER INC., d/b/a
GHOSTGUNNER.NET, et al.,

Defendants.

Case No.: 34-2021-00302934-CU-PO-
GDS

**CITY OF SACRAMENTO,
SACRAMENTO POLICE
DEPARTMENT'S RESPONSE TO
STIPULATION AND ORDER RE:
MOTION TO COMPEL
COMPLIANCE WITH SUBPOENA**

I.

INTRODUCTION

The City of Sacramento, Sacramento Police Department ("SPD") respectfully submits this brief response to the Stipulation and Order re: Motion to Compel Compliance with Records Subpoena issued by the Honorable Lauri A. Damrell. In particular, SPD believes that it is prudent that the Court issues an order with respect to Plaintiffs' records subpoena seeking to examine the physical evidence (i.e., firearms) that were used in the homicide of SPD Officer Tara O'Sullivan (Badge #349) on grounds that SPD has a mandated duty to preserve the

1 evidence and, as a part of the prosecution team, seeks as minimal intrusion as possible with
2 respect to the criminal matter involving Adel Sambrano Ramos (Sacramento County Superior
3 Court Case No. 19FE011057).

4 II.

5 Pertinent Factual Summary

6 On June 19, 2019, SPD Officer Tara O’Sullivan was murdered by Adel Sambrano Ramos
7 (“Ramos”) while responding to a disturbance call for service. Ramos plead guilty to the murder
8 of Officer O’Sullivan on August 30, 2024 and has been subsequently sentenced to the death
9 penalty on June 27, 2025. The legal counsel for Ramos is currently in transition from trial
10 counsel to appellate counsel.

11 III.

12 Legal Analysis

13 Law enforcement agencies have a duty to preserve evidence that may be expected to play
14 a significant role in the suspect’s defense. (People v. Farnam (2002) 28 Cal.4th 107, 166.) The
15 duty is further limited when such evidence can be subjected to tests which may exonerate the
16 defendant. (People v. Farnum, supra, 28 Cal.4th at 166; citing Arizona v. Youngblood (1988)
17 488 U.S. 51, 57.)

18 While, the firearms in question have been examined by the Sacramento County Crime
19 Lab and Ramos’ trial counsel defense, the appellate counsel may wish to have the firearms
20 reexamined. Minimal intrusion in the inspection of the firearms is critical in the ongoing
21 capital punishment matter. In addition, having the firearms only being handled by the SPD
22 Armorer also will maintain chain of custody and dissolves any such potential objections by
23 future appellate counsel for Ramos.

24 As set forth in the declaration of Plaintiffs’ counsel (Caitlin M. Woods) and Plaintiff’s
25 motion to compel, counsel has taken great efforts in allaying SPD’s concerns with the
26 inspection of the firearms used in the murder of Officer O’Sullivan. Pursuant to Code of Civil
27 Procedure section 1987.1, SPD respectfully requests that the Court issue an order upon the
28 conditions set forth in Plaintiffs’ subpoena upon nonparty SPD.

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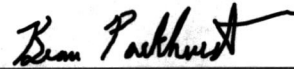
III.

CONCLUSION

For the reasons set forth above, SPD respectfully requests the conditions of Plaintiffs' Records Subpoena to inspect the firearms directly connected to the People v. Ramos (19FE011057) is made an order from the Court. The undersigned counsel will also be in attendance at the upcoming Case Management Conference on February 20, 2026 should the Court have any questions for the SPD.

DATED: February 17, 2026

GUSTAVO L. MARTINEZ,
City Attorney



Beau Parkhurst (Feb 17, 2026 13:39:18 PST)

By:

BEAU E. PARKHURST
Senior Deputy City Attorney

Attorneys for the
CITY OF SACRAMENTO

1 **PROOF OF SERVICE**

2 CASE NAME: O'Sullivan v. Ghost Gunner et al.
3 COURT: Sacramento Superior Court
4 CASE NUMBER: 34-2021-00302934-CU-PO-GDS

5 I declare that:

6 I am employed in the County of Sacramento, California. I am over the age of eighteen
7 years and not a party to this action; my business address is 915 I Street, Room 4010,
8 Sacramento, CA 95814-2604. On the date executed below, I served the following
9 document(s):

10 **CITY OF SACRAMENTO, SACRAMENTO POLICE DEPARTMENT'S RESPONSE
11 TO STIPULATION AND ORDER RE: MOTION TO COMPEL COMPLIANCE
12 WITH SUBPOENA**

13 **By Electronic Service.** Based on a court order or an agreement of the parties to accept
14 electronic service. I caused the documents to be sent to the persons at the electronic service
15 addresses listed below.

16 addressed as follows:

17 Robert J. Nelson at RNELSON@lchb.com;
18 Philip Bangle at pbangle@bradyunited.org;
19 Caitlin M. Woods at cwoods@lchb.com;
20 Julia Remuszka at jremuszka@lchb.com;
21 Sean Brady at sbrady@michellawyers.com;
22 Howard Schilsky at hschilsky@renzullilaw.com;
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26 David Melson at dmelton@porterscott.com;
27 Brian M. Sanders at brian.sanders@knchlaw.com;
28 John Dillon at jdillon@dillonlawgp.com;
Michael Kronlund at mkronlund@quinnlaw.net

I declare under penalty of perjury that the foregoing is true and correct, and that the
declaration was executed on February 17, 2026, at Sacramento, California.



Christina Will (Feb 17, 2026 13:40:25 PST)

Christina Will