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October 22, 2024

*Via Email and U.S. Mail*  
nickbradleyipi@gmail.com

Bradley Investigative Services  
4629 Cass Street #303  
San Diego, CA 92109

Re: **Services and Conduct of Bradley Investigative Services**

Dear Bradley Investigative Services:

I write on behalf of Del Mar Union School District ("District") regarding services performed by Bradley Investigative Services ("BIS") under the Agreement entered into between BIS and the District on or about November 7, 2023, as ratified by the District's Governing Board on November 15, 2023, and amended on March 14, 2024. As you know, the District contracted with BIS to investigate the residency of [REDACTED]. The scope of the investigation included observation of [REDACTED]. It did not include observations at or access to District school sites.

In communications with you, the District provided you with a copy of the District's administrative regulation detailing permissible conduct for residency investigations of students in the District. In a March 26, 2024 communication with you, the District provided you with its Administrative Regulation 5111.1. The March 26, 2024 communication specifically highlights the following language: "for any investigation conducted pursuant to this policy, the District "shall prohibit the surreptitious photographing or video- recording of students who are being investigated"; and "require that the employees and contractors of the District engaged in the investigation must identify themselves truthfully as such to individuals contacted or interviewed during the course of the investigation."

On October 15, 2024, the District received a copy of an April 26, 2024 police report which indicated that Jorge Valenzuela, private investigator, had visited, and even parked at, the Del Mar Hills Academy school site on multiple occasions. When apprehended by an on duty uniformed police officer on April 26, 2024, Mr. Valenzuela reported that he was armed with a gun, that he possessed a California Concealed Carry Weapon permit ("CCW"), understood that he was not permitted to possess a concealed carry weapon on school grounds, and that he was a private investigator working on "a case."

Penal Code § 626.9, known as the "Gun-Free School Zone Act," generally prohibits the use or possession of a gun in a school zone. A "school zone" is any area within 1,000 feet of a public or

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private school. Penal Code § 626.9(c)(5) indicates that in circumstances in which an individual holds a valid license to carry a firearm, punishment under Gun-Free School Zone Act does not apply “[w]hen the person holds a valid license to carry the firearm... who is carrying that firearm in an area that is within a distance of 1,000 feet from the grounds of the public or private school, but is not within any building, real property, **or parking area under the control of a public or private school** providing instruction in kindergarten or grades 1 to 12, inclusive, or on a street or sidewalk immediately adjacent to a building, real property, or parking area under the control of that public or private school...” (Emphasis added.) As a holder of a CCW, Mr. Valenzuela is tasked with knowing the law that pertains to such licensure.

Under the terms of the Independent Contractor Agreement, the District had no knowledge that BIS allowed its agents to possess weapons, including guns, while conducting the investigation. Nor did the District have any knowledge that BIS intended to visit, park at or near, or engage with anyone on any District campuses as part of BIS’s residency investigation. The District did not authorize use or possession of a firearm by BIS as part of the investigation process. However, as learned by the District on October 15, 2024, the April 26, 2024 police report clearly indicates that BIS’s investigator was within the parking lot at a District elementary school in possession of a weapon.

The District takes very seriously its obligations to provide a safe environment for its community. The facts and circumstances outlined above demonstrate conduct inconsistent with the District’s purpose of maintaining safe, secure, and orderly conduct on all District campuses. I want to emphasize that **at no point** did the District authorize use or possession of a firearm on its school campuses or in its residency investigation. The BIS agent clearly violated the law and acted in excess of the contract between BIS and the District, which is now expired. As a result of Mr. Valenzuela’s actions, the District does not intend to make use of BIS’s services in the future.

If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Leslie Montoro".

Leslie Montoro  
Executive Director of Student Services  
Del Mar Union School District

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