SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

v.

KEVIN PERELMAN,
Defendant.

Case No. LA099813

DEFENDANT'S RESPONSE TO PROBATION OFFICER'S REPORT

TO THE HONORABLE COURT:

Defendant Kevin Perelman respectfully submits the following response to the Probation Officer's Report dated October 12, 2023. Defendant objects to the unsupported mental-health allegations, speculative conclusions, and repeated characterizations contained within the report and respectfully requests that such statements be afforded **no weight** by the Court.

I. INTRODUCTION

The Probation Officer's Report contains numerous statements from individuals characterizing Defendant as "crazy," "schizophrenic," in need of medication, counseling, institutionalization, or removal from the community. These statements are repeated throughout the report despite the complete absence of any medical diagnosis, expert evaluation, psychiatric records, or competent evidence supporting such conclusions.

The issue before the Court is not whether these individuals sincerely hold such opinions. The issue is whether these opinions possess sufficient reliability and foundation to be considered by the Court in determining sentence and conditions of probation.

Defendant respectfully submits that they do not.

II. STATEMENTS ATTRIBUTED TO DETECTIVE I. GARCIA

The probation report states that Detective I. Garcia advised probation:

"The defendant is crazy and not remorseful at all. This case will probably go to mental health court."

The report provides:

- no attached report;
- no attached email;
- no factual basis;
- no explanation;
- no mental-health evaluation;
- no diagnosis;
- no supporting documentation.

Detective Garcia is not identified as a mental-health professional, psychologist, psychiatrist, or expert capable of rendering a psychiatric diagnosis.

Accordingly, Defendant respectfully submits that these statements are unsupported personal opinions and should be afforded no weight.

III. STATEMENTS ATTRIBUTED TO TERRANCE SCROGGINS

The report attributes the following statements to Mr. Scroggins:

"That person ruined my car, ruined my loaner car and ruined my girlfriend's car."

"He is an insane asshole."

"I'm pretty sure that he has menaced other people."

"To the best of my knowledge, he hit 10 other cars in the neighborhood."

"I have encountered him on a few occasions and he is absolutely crazy."

"I believe he came after me when he was in his vehicle and I was walking on the street; however, I'm unable to confirm."

"I do believe this person needs to be in a mental health institution for the rest of his life."

Defendant objects to these statements because:

1. Defendant has no personal relationship with Mr. Scroggins, and no basis exists to conclude that Mr. Scroggins possesses sufficient personal knowledge to render

psychiatric opinions concerning Defendant. His statements regarding Defendant's mental condition are unsupported lay opinions.

2. No supporting evidence is identified.
3. The report identifies no medical basis for these conclusions.
4. Statements regarding institutionalization are not medical findings.
5. The report contains no evidence supporting allegations concerning other vehicles or other victims.

IV. STATEMENTS ATTRIBUTED TO JASON RYAN FISHMAN

The report attributes the following statements:

Defendant suffers from schizophrenia.

Defendant should be removed from the community.

Defendant needs mental health counseling.

Defendant caused damage to his business.

Defendant objects because:

1. There is no diagnosis of schizophrenia.
2. No medical records are cited.
3. No expert testimony is cited.
4. No evidence is identified establishing damage to any business.
5. Statements regarding removal from the community constitute personal opinions and requests for punishment rather than factual findings.

V. STATEMENTS ATTRIBUTED TO THE APPROXIMATELY $1,000 VEHICLE COMPLAINANT

The report states that this individual believes Defendant:

- displays strange behavior;
- may be capable of unknown acts;

- needs medication;
- needs counseling.

Defendant objects because these statements are speculative opinions unsupported by any medical evidence or expert testimony.

VI. LACK OF FOUNDATION FOR PSYCHIATRIC OPINIONS

Defendant has no personal relationship with Detective Garcia, Terrance Scroggins, Jason Ryan Fishman, or the other individuals whose opinions are summarized in the Probation Officer's Report.

Defendant has not maintained friendships, close associations, confidential relationships, or any other relationship through which these individuals could acquire meaningful knowledge of his mental or psychological condition.

To the extent Defendant has interacted with these individuals, those interactions have been limited, incidental, unwanted, or adversarial in nature.

Defendant generally attempts to avoid interactions with individuals whom he believes are not acting honestly or in good faith toward him. Consequently, there is no basis to conclude that these individuals possess the type of sustained, personal, or confidential relationship necessary to form reliable opinions concerning Defendant's mental health.

Defendant further contends that many of the encounters occurred because these individuals approached him, confronted him, followed him, inserted themselves into his activities, or otherwise initiated contact while Defendant was attempting to attend to his own affairs and continue with his daily life.

The fact that a person repeatedly initiates contact or engages in adversarial interactions with Defendant does not provide that person with a reliable foundation to offer psychiatric opinions about him.

Unwanted, adversarial, or repeatedly initiated encounters do not provide a factual basis to infer mental illness or permit lay witnesses to render psychiatric conclusions concerning Defendant.

The Probation Officer's Report does not identify the duration, frequency, or circumstances of each individual's actual personal contact with Defendant. Nor does it distinguish between observations made during neutral interactions and reactions occurring during unwanted or adversarial encounters.

Without that context, the report risks presenting the individuals' own confrontational interactions as proof of a psychological condition in Defendant.

The Court should also consider that no witness identified in the Probation Officer's Report is shown to have training in psychiatry, psychology, or mental-health diagnosis. Yet numerous individuals, having no personal relationship with Defendant, repeatedly reach the same psychiatric conclusions and recommendations concerning medication, counseling, institutionalization, or removal from the community. The absence of both expertise and personal knowledge substantially undermines the reliability of these opinions.

VII. REPETITION OF IDENTICAL LABELS

The most striking aspect of the report is not merely that the statements are speculative, but that numerous individuals repeatedly use substantially identical labels and conclusions despite having no personal relationship with Defendant and despite the absence of any medical diagnosis, expert evaluation, or supporting evidence.

The repeated use of substantially similar terms, including:

- "crazy;"
- "schizophrenia;"
- "needs medication;"
- "needs counseling;"
- "mental health institution;"
- "removed from the community;"
- "strange behavior;"

raises significant concerns regarding reliability.

The repetition of nearly identical descriptions by individuals who possess no personal relationship with Defendant raises a fundamental question regarding foundation and source. These individuals are not part of Defendant's personal life, have not maintained any sustained relationship with him, and lack the kind of direct, prolonged contact from which any meaningful psychological assessment could be formed. Yet they speak as though they possess broad knowledge of Defendant's character, behavior, and mental condition.

The Probation Officer's Report does not explain how these individuals acquired the information upon which their sweeping conclusions supposedly rest. If their opinions are not based on a personal relationship, direct observation over time, professional evaluation, or independently verified facts, then the Court should scrutinize whether they instead rely upon rumor, second-hand accounts, shared narratives, information supplied by others, assumptions, or limited and adversarial encounters that do not provide a reliable foundation for psychiatric conclusions.

The descriptions and accusations directed toward Defendant are often vague and subject to broad interpretation. The factual accusations also shift—from alleged property damage, to alleged business harm, to "strange behavior," and to speculation concerning what Defendant may be capable of. Despite these changing accusations and circumstances, the same ultimate conclusions repeatedly reappear: that Defendant is "crazy," mentally ill, requires medication or counseling, should be institutionalized, or should be removed from the community.

This rotating use of different accusations to support the same predetermined psychological conclusion raises serious concerns regarding bias, motive, and reliability. It suggests that the psychiatric label is not the product of any consistent medical or factual analysis, but instead functions as a fixed conclusion to which changing accusations are attached.

The recurring use of substantially identical labels creates an artificial appearance of corroboration even where each speaker may be relying upon assumptions, rumor, prior characterizations, shared narratives, second-hand information, or generalized conclusions rather than independent personal knowledge.

The report therefore presents conclusions without identifying the source, method, or reliable basis of the supposed knowledge behind them. That gap goes directly to personal knowledge, credibility, bias, and weight.

The absence of any identified source of knowledge raises a substantial question as to how individuals with no personal relationship to Defendant purport to possess such broad conclusions concerning his character, conduct, and alleged mental condition.

Repetition alone does not transform unsupported accusations, shifting factual allegations, or lay psychiatric opinions into competent evidence.

VIII. SYSTEMATIC PATTERN OF CHARACTER LABELING

Defendant further contends that the opinions summarized in the Probation Officer's Report should not be viewed in isolation.

According to the report itself, multiple individuals who have no personal relationship with Defendant nevertheless repeatedly reach substantially identical conclusions regarding Defendant's alleged mental condition, dangerousness, need for medication, need for counseling, institutionalization, or removal from the community.

Defendant respectfully submits that this pattern is significant because the individuals expressing these opinions are not described as neutral observers with longstanding personal knowledge of Defendant. Rather, the report reflects that many of the interactions arose from limited, unwanted, or adversarial encounters.

The Court should therefore consider whether the repeated use of substantially identical labels reflects independent observations or instead demonstrates a recurring process in which generalized characterizations are applied to Defendant and then used to interpret later interactions.

Defendant further contends that once such labels are adopted, ordinary disagreements, reactions to confrontations, efforts to avoid unwanted contact, or attempts to seek assistance may themselves be interpreted through the lens of those preexisting assumptions, thereby reinforcing the original characterization.

The practical effect is that the labels become self-perpetuating. The repeated application of substantially identical descriptions can create an appearance of corroboration and consensus despite the absence of any medical diagnosis, expert evaluation, or competent evidence supporting those conclusions.

The magnitude, consistency, persistence, and recurring nature of these substantially similar accusations warrant careful scrutiny as to whether the repeated characterizations stem from independent knowledge or from a systematic process of reinforcement and repetition.

Accordingly, Defendant respectfully submits that the pattern reflected in the report raises legitimate concerns regarding bias, source, motive, and whether the repeated characterizations represent independently formed observations or a systematic process of reinforcing a preconceived narrative concerning Defendant.

IX. ABSENCE OF ANY MEDICAL FOUNDATION

Defendant has never been diagnosed with schizophrenia or any condition requiring psychotropic medication.

The probation report cites no medical records, evaluations, diagnoses, or expert opinions supporting such recommendations.

Defendant has never been placed under a conservatorship.

Defendant has never been declared incompetent.

Defendant has never been involuntarily committed for psychiatric treatment.

Although Detective Garcia opined that this case would "probably go to mental health court," Defendant has never been placed in mental health court, never been ordered to undergo a competency evaluation, and never been judicially determined to suffer from a mental illness requiring involuntary treatment.

No doctor, psychiatrist, psychologist, or mental-health professional has been identified in the report as diagnosing Defendant with schizophrenia or any other mental illness requiring medication or institutionalization.

X. PRACTICAL CONSEQUENCES OF REPEATED LABELING

Defendant further notes that the repeated use of unsupported mental-health labels has had practical consequences beyond the contents of this report.

Defendant contends that these repeated characterizations have made it exceedingly difficult to seek assistance from law enforcement or establish a paper trail concerning his own complaints and concerns.

Defendant has experienced circumstances in which officers with whom he had no prior relationship appeared to approach him with preconceived opinions regarding his character or mental state.

Defendant further contends that the repeated dissemination of unsupported labels has made it exceedingly difficult to obtain meaningful assistance from law enforcement or establish a paper trail concerning his own complaints because interactions frequently begin with assumptions regarding Defendant’s mental state rather than an examination of the underlying facts.

Whether accurate or not, Defendant's perception has been that he is frequently met with distrust, dismissal, or assumptions concerning his mental health before the underlying facts are investigated or considered.

The Court need not resolve these broader disputes to recognize the concern presented here: unsupported labels, repeated over time by numerous individuals who have no personal relationship with Defendant, can become self-reinforcing and create an appearance of reliability simply because they are repeated by multiple sources.

Such repetition may also impair Defendant's ability to seek assistance, report concerns, or create an objective record because future interactions may begin with inherited assumptions rather than independent evaluation.

The practical effect is that unsupported characterizations can become circular. The labels influence how later complaints are received, and the resulting dismissive treatment is then treated as further support for the original labels.

Such repetition, however, does not constitute proof, a diagnosis, or competent evidence.

XI. REQUEST FOR RELIEF

For all of the foregoing reasons, Defendant respectfully requests that the Court:

1. Recognize that the mental-health allegations contained in the probation report are unsupported lay opinions.
2. Recognize that the report contains no medical diagnosis, expert evaluation, or competent evidence supporting allegations of schizophrenia, dangerousness, or a need for medication or institutionalization.
3. Afford **no weight** to the unsupported mental-health opinions and speculative characterizations contained within the probation report.
4. Decline to treat the repetition of substantially identical labels as independent corroboration of any mental-health condition.

XII. CONCLUSION

The individuals expressing these opinions have no personal relationship with Defendant and possess no demonstrated expertise, medical training, or factual foundation to render psychiatric conclusions concerning him.

The repeated use of substantially identical labels by unrelated individuals raises significant concerns regarding reliability. The record contains no medical diagnosis, mental-health evaluation, expert opinion, competency finding, or other factual foundation supporting the repeated assertions that Defendant is mentally ill, requires medication, needs institutionalization, or should be removed from the community.

Accordingly, these repeated characterizations cannot reasonably be regarded as independent psychiatric observations concerning Defendant's actual mental condition. They are unsupported lay opinions and subjective interpretations that should be afforded no evidentiary weight.

The magnitude, consistency, persistence, and recurring nature of these substantially similar accusations raise a legitimate concern that the repeated labels serve to establish and reinforce a preconceived narrative about Defendant rather than to provide neutral, independently formed observations.

This concern is heightened because the speakers lack the personal knowledge necessary to reach such conclusions independently, yet repeatedly advance the same ultimate result: portraying Defendant as mentally ill, dangerous, in need of medication or institutionalization, unworthy of being believed, or someone who should be removed from the community.

The cumulative pattern also creates an artificial appearance of corroboration. Repetition by multiple persons does not establish independent confirmation where the repeated characterizations are vague, unsupported, and potentially derived from rumor, prior labeling, shared assumptions, or information disseminated by others.

The Court should also consider that the individuals offering these psychiatric opinions are, in many instances, the same individuals making the underlying accusations and seeking a particular outcome against Defendant. This creates a substantial concern regarding bias and motive because the witnesses' own disputed allegations are then used as the asserted factual basis for their psychological conclusions.

The pattern reflected in the report is circular: an accusation is made, the accusation is treated as true without independent verification, and that same unverified accusation is then used to support the conclusion that Defendant is "crazy," mentally ill, dangerous, in need of medication, or should be institutionalized or removed from the community. In this manner, the witnesses' own allegations become the foundation and leverage for their own psychiatric opinions.

The allegation becomes the premise, the premise becomes the psychiatric label, and the label then becomes the asserted justification for punishment, exclusion, medication, institutionalization, or disbelief of Defendant's own statements.

The Court should further consider that no witness identified in the Probation Officer's Report purports to have any training in psychiatry, psychology, or mental-health diagnosis. Yet numerous individuals, having no personal relationship with Defendant, repeatedly advance changing, vague, and sometimes unrelated accusations while arriving at the same psychiatric conclusions and recommendations concerning medication, counseling, institutionalization, dangerousness, or removal from the community.

The accusations may shift from alleged property damage, to alleged threats, to alleged business harm, to "strange behavior," to speculation about what Defendant may be capable of. Despite those changing factual theories, the same ultimate conclusion is repeatedly asserted: that Defendant is mentally ill and should be controlled, medicated, institutionalized, disbelieved, or excluded.

This rotating use of different accusations to support the same predetermined psychological conclusion raises serious concerns regarding bias, motive, and reliability. It suggests that the labeling is not the product of any consistent medical or factual analysis, but is instead being used as a fixed conclusion to which changing accusations are attached.

The absence of expertise, personal knowledge, consistent factual support, and independent verification substantially undermines the reliability of these opinions.

Defendant does not ask the Court to find motive from repetition alone. He asks the Court to recognize that the scale, uniformity, persistence, circular reasoning, and cumulative nature of the statements warrant serious scrutiny of possible bias, source, purpose, and whether the opinions were independently formed or instead repeated through a systematic process designed to produce a desired conclusion.

Accordingly, Defendant respectfully requests that the Court afford no weight to the unsupported and unverified accusations, shifting factual allegations, speculative characterizations, mental-health opinions, circular lay conclusions, and repeated psychiatric labels contained within the Probation Officer's Report.

Dated: 7/24/2026

Respectfully submitted,

KEVIN PERELMAN
Defendant, In Pro Per

