SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES
VAN NUYS COURTHOUSE

THE PEOPLE OF THE STATE OF CALIFORNIA,
Plaintiff,

v.

KEVIN PERELMAN,
Defendant.

Case No.: LA099813

DEFENDANT'S MOTION FOR TRANSFER OF FURTHER PROCEEDINGS OUT OF THE VAN NUYS COURTHOUSE TO A DIFFERENT COUNTY, OR, IN THE ALTERNATIVE, TO A DIFFERENT COURTHOUSE; ALTERNATIVELY, REQUEST TO STRICTLY LIMIT RESENTENCING TO THE SCOPE OF REMAND

Date: [To Be Set]
Time: [To Be Set]
Dept.: [To Be Assigned]
Judge: [To Be Assigned]

I. INTRODUCTION

Defendant Kevin Perelman respectfully requests that this Court transfer further proceedings, including resentencing, out of the Van Nuys Courthouse to a different county, or, in the alternative, to a different courthouse, due to the substantial appearance that Defendant cannot receive a fair, neutral, and impartial resentencing in the Van Nuys Courthouse.

If the Court denies transfer, Defendant requests that the Court expressly limit the resentencing hearing to the scope of the appellate remand: correction of the sentencing structure, application of all credits and time already served, calculation of any completed supervision, and determination of any lawful remaining sentence, if any.

The Court should exclude unrelated post-judgment allegations, hearsay, police-contact narratives, mental-health speculation, community fear claims, courthouse rumor, informal character statements, or character evidence not properly noticed, supported, and legally relevant to the limited resentencing task.

This motion is brought to protect Defendant's due process rights, right to a fair and impartial tribunal, right to reliable sentencing, and right to avoid vindictive or expanded resentencing after a successful appeal.

II. PROCEDURAL BACKGROUND

Defendant was convicted in Los Angeles Superior Court case number LA099813.

On November 14, 2024, Defendant was sentenced on Count 002, felony vandalism, under Penal Code section 1170(h), and on Count 003, misdemeanor vandalism.

The Court of Appeal reversed and remanded for resentencing because the original sentencing structure was legally defective. The remand concerns sentencing structure. It was not a remand for retrial, dangerousness reassessment, mental-health evaluation, competency proceeding, psychiatric proceeding, or new litigation of unrelated alleged conduct.

Defendant now faces resentencing before the same Van Nuys Courthouse environment in which he contends significant fairness problems occurred.

III. GROUNDS FOR TRANSFER OUT OF THE VAN NUYS COURTHOUSE TO A DIFFERENT COURTHOUSE OR, IN THE ALTERNATIVE, A DIFFERENT COUNTY; OR REASSIGNMENT

A. Defendant Has a Good-Faith Basis to Believe He Cannot Receive a Fair and Neutral Resentencing in the Van Nuys Courthouse

Defendant contends that the Van Nuys Courthouse environment has been affected by prior proceedings, informal narratives, courthouse personnel conduct, witness-related hostility, and repeated characterizations of Defendant that are not based on admissible evidence, including group efforts to portray Defendant as dangerous or a public nuisance.

Defendant further contends that prior proceedings reflected a pattern in which defense evidence, impeachment evidence, witness-bias evidence, and context necessary to understand the case were excluded, minimized, or not presented, while the prosecution narrative was permitted to portray Defendant as dangerous, unstable, or the aggressor.

Defendant does not raise these concerns to relitigate the entire trial at resentencing. Defendant raises them because resentencing must be conducted by a tribunal that appears fair, neutral, and detached, especially where the defense expects the prosecution may attempt to expand the hearing beyond the appellate remand.

B. Courthouse Personnel With Personal Connection to Defendant Creates an Appearance-of-Bias Concern

Defendant contends that the appearance of neutrality in the Van Nuys Courthouse is compromised by the involvement or influence of courthouse personnel with personal knowledge of, or personal connection to, Defendant outside the courtroom.

Specifically, Defendant has personal knowledge that Van Nuys court reporter Debbie Wollman owned property adjoining Defendant's property for many years and had a personal/property-related connection to Defendant's residential environment. Defendant had verbal communications and written communications connected to property-related issues, including issues involving Defendant's vehicle.

Defendant also has video evidence of court reporter and Neighbor Debbie Woll stating that Defendant is schizophrenic and needs to admit it. Defendant contends that these statements and related circumstances show that mental-health labels and characterizations about Defendant existed outside any proper court finding, psychiatric evaluation, admissible evidence, or lawful sentencing factor.

This issue is directly relevant to resentencing because Defendant is concerned that informal courthouse narratives, mental-health labels, personal-property conflicts, courthouse personnel connections, and non-evidentiary characterizations may influence the proceeding despite the Court of Appeal's remand being limited to correction of the sentencing structure.

Defendant does not raise this issue to litigate every property dispute or every outside statement in this motion. Defendant raises it because it supports transfer, reassignment, or at minimum a strict limiting order preventing resentencing from becoming a character, mental-health, or dangerousness proceeding based on rumor, informal courthouse impressions, hearsay, or unsupported allegations.

C. Lead Officer Dinse and Community Coordination Helped Create a False Narrative Before the Courthouse

Defendant contends that the proceedings treated the case as if it involved isolated one-to-one disputes, when the defense position involved a broader pattern of repeated targeting, provocation, vandalism, defacement of property, and coordinated efforts to portray Defendant as dangerous, mentally unstable, or a public nuisance, and to promote his removal from the community on the asserted premise that he was unpredictable and posed an undefined risk.

Defendant further contends that Lead Officer Charles Sean Dinse, working with community members, neighborhood watch participants, and others in the local area, helped poison the well by circulating labels and characterizations that were designed to get what they wanted rather than reflect what actually occurred. Defendant contends that these actions

were used to create the appearance that Defendant was unstable, dangerous, mentally ill, or unreasonable when he responded to years of repeated targeting and provocation.

This distinction matters because a conventional courtroom presentation can falsely simplify the case into: one defendant, one alleged victim, one event, one date. Defendant contends that this structure prevented the jury and court from receiving the full context necessary to evaluate witness bias, motive, credibility, Defendant's state of mind, and whether the prosecution narrative was artificially narrow. Defendant further contends that this was a significant problem at trial itself because the decisionmakers had already been fed a false narrative before ever entering the courthouse.

Defendant contends that evidence of repeated targeting, vehicle vandalism, property defacement, hostile statements, provocation, and coordination among individuals instigating conflict was either not presented, not admitted, or not meaningfully used to impeach witnesses. As a result, the jury was left with an incomplete and misleading version of events that portrayed Defendant as the aggressor while omitting the surrounding conduct that explained why the situation was not neutral.

Defendant further contends that the omission of this context allowed ordinary human responses to repeated provocation to be reframed as instability, dangerousness, or mental illness, rather than evaluated in light of the surrounding events.

Defendant raises this issue here because resentencing should not repeat the same error by allowing unrelated, one-sided, post-judgment allegations, "community fear" claims, informal police narratives, or mental-health speculation to be used without the broader context necessary to evaluate them fairly.

D. The Appearance of Bias Requires Transfer Out of the Van Nuys Courthouse

Defendant requests transfer out of the Van Nuys Courthouse because a reasonable person aware of the circumstances could question whether resentencing can be fairly and neutrally conducted in that courthouse without reliance on prior impressions, disputed narratives, unsupported characterizations, or information outside the proper resentencing record.

Defendant is not requesting transfer merely because prior rulings were adverse. Defendant is requesting transfer because the cumulative circumstances create an appearance that resentencing in the Van Nuys Courthouse may not be perceived as neutral, especially if the prosecution attempts to introduce unrelated post-judgment allegations, mental-health speculation, community fear claims, or character narratives.

IV. IF VENUE TRANSFER OR REASSIGNMENT IS DENIED, THE COURT SHOULD STRICTLY LIMIT RESENTENCING

If the Court denies transfer, Defendant requests a clear limiting order.

The resentencing should be limited to:

The scope of the Court of Appeal's remand;

Correction of the unlawful sentencing structure;

Separation of Count 002 and Count 003 into lawful sentencing components;

Application of all custody credits;

Recognition of time already served under court supervision;

Determination whether Count 003 is fully satisfied;

Determination whether any further supervision remains lawful or necessary;

Avoidance of any increased punishment based on Defendant's successful appeal.

The Court should not permit resentencing to become a new informal trial regarding Defendant's character, mental state, unrelated police contacts, community complaints, Starbucks-type incidents, hearsay allegations, disputed post-judgment narratives, or non-expert mental-health speculation.

The Court of Appeal remanded for resentencing because the original sentence structure was unlawful. The remand should not be used to conduct a new character proceeding or to introduce unrelated disputed allegations, including claims of community-instigated provocation or attempts to manufacture reactions for the purpose of increasing punishment, that were not part of the trial, not part of the appellate remand, and not properly established through admissible evidence.

V. REQUEST TO EXCLUDE UNRELATED AND UNSUPPORTED ALLEGATIONS

Defendant requests that the Court exclude or disregard any attempt by the prosecution to introduce or rely upon:

Uncharged conduct;

Unrelated police contacts;

Informal LAPD opinions;

Community fear statements;

Hearsay allegations;

Mental-health speculation by non-experts;

Bodycam clips or police recordings offered without full context;

Courthouse rumor or informal character statements;

Post-judgment events not properly noticed, authenticated, and tied to a lawful sentencing factor;

Any argument that Defendant should receive increased punishment because he successfully appealed;

Any attempt to reframe Defendant's responses to repeated provocation as evidence of mental illness, dangerousness, or instability without admissible evidence and proper foundation.

If the prosecution seeks to rely on any new alleged conduct or post-judgment event, Defendant requests advance notice, disclosure of all supporting materials, a meaningful opportunity to respond, and a ruling on admissibility and relevance before the material is considered.

Defendant further requests that the Court require the prosecution to identify the specific legal basis for any new material it seeks to introduce and explain how that material is relevant to the limited resentencing task.

VI. REQUESTED RELIEF

Defendant respectfully requests that the Court:

Grant a transfer of further proceedings, including resentencing, out of the Van Nuys Courthouse to a different county, or, in the alternative, to a different courthouse; or

In the alternative, enter a limiting order restricting resentencing to the appellate remand, sentencing correction, credits, time served, completed supervision, and lawful remaining sentence only; and

Exclude unrelated, uncharged, hearsay, mental-health, community-fear, courthouse-rumor, or police-contact allegations from resentencing unless properly noticed, supported, authenticated, and legally relevant; and

State the reasons for any denial clearly on the record.

DATED: _____

Respectfully submitted,

Kevin Perelman / Attorney for Defendant

DECLARATION OF KEVIN PERELMAN

I, Kevin Perelman, declare:

I am the defendant in this case.

I make this declaration in support of my request for transfer out of the Van Nuys Courthouse to a different county, or in the alternative to a different courthouse, or strict limitation of the resentencing hearing.

I am concerned that the Van Nuys courthouse environment is not neutral. In addition to the history of rulings and proceedings in this case, I have personal knowledge that Van Nuys court reporter Debbie Wollman owned property adjoining my property for many years and had a property-related connection to my residential environment, as well as similar types of ongoing situations involving people who want to engage with me with motive and these community policing groups.

I had verbal communications and written communications connected to property-related issues, including issues involving where my vehicle was parked.

I also have video evidence of court reporter and Neighbor Debbie Wollman stating that I am schizophrenic and need to admit it. I contend that these statements and related circumstances show that mental-health labels and characterizations about me existed outside any proper court finding, psychiatric evaluation, admissible evidence, or lawful sentencing factor.

I am concerned that informal mental-health characterizations, property-related conflicts, courthouse personnel connections, and non-evidentiary characterizations contributed to a prejudicial narrative about me within or around the Van Nuys courthouse.

I am concerned that statements by courthouse personnel or persons connected to the courthouse labeling me as mentally ill, unstable, or schizophrenic may have influenced the courthouse environment and may affect resentencing if the hearing is not transferred, reassigned, or strictly limited.

During the trial and sentencing process, I contend that important defense evidence, impeachment evidence, witness-bias evidence, and contextual evidence were not presented or were not allowed in a way that permitted a fair evaluation of the charges.

I contend that the proceedings treated the case as if it involved isolated one-to-one disputes, when the defense position involved repeated targeting, vandalism, property defacement, provocation, and nonstop instigation by rotating groups of individuals over time, together with the inability or unwillingness of police to take proper reports, conduct meaningful investigation, or stop the conduct.

I contend that this broader context was necessary to evaluate community and witness bias, motive, credibility, my state of mind, and whether the prosecution's narrative was artificially narrow and misleading.

I am concerned that ordinary responses to repeated provocation and targeting were reframed as instability, dangerousness, or mental illness without proper foundation, admissible evidence, or qualified expert evaluation.

I am concerned that resentencing may be expanded beyond the appellate remand through unrelated allegations, police contacts, hearsay, community fear claims, courthouse rumor, or mental-health speculation.

I request that any resentencing be conducted outside the Van Nuys Courthouse by a neutral court and limited to the lawful resentencing issues identified by the Court of Appeal.

I request that the Court not consider unrelated post-judgment allegations unless they are properly noticed, authenticated, supported by evidence, and legally relevant to resentencing.

I make this declaration in good faith to protect my right to due process and a fair resentencing.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on _____, 2026, at _____, California.

KEVIN PERELMAN
Defendant, In Pro Per

