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2 404 East 1st Street #1405
3 Long Beach, CA 90802
4 Telephone: (562) 277-5602

5 Plaintiff in Pro Per
6
7

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10

11 Andre Andrews,
12 Plaintiff,

13
14 vs.

15
16 Culver City Police Department,
17 Culver City,
18 Donald Pedersen,
19 James Cendrowski,
20 Enrique Hernandez,
21 Milton McKinnon,
22 Lisa Vidra,
23 James Thomas,
24 Herbert Turner, individually and in their
25 official capacities;
26 DOES 1-100
27 Defendants.
28

Case No. CV 14-774-MWF(VBK)
Civil Rights Complaint Pursuant to
42 U.S.C. § 1983

COMPLAINT FOR:

1. DECLARATORY AND
INJUNCTIVE RELIEF

2. COMPENSATORY, PUNITIVE,
AND EXEMPLARY DAMAGES

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1 GABRIEL H. AVINA, ESQ. (SBN: 216099)
2 LAW OFFICES OF GABRIEL H. AVINA
3 3781 CIMARRON STREET
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Superior Court Of California
County Of Los Angeles

OCT 30 2014

Sherri R. Carter, Executive Officer/Clerk
By: Kristina Vargas, Deputy

Attorney for IN PRO PER

5
6 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
7 **COUNTY OF LOS ANGELES - LIMITED JURISDICTION**

8 GABRIEL H. AVINA, an individual,
9 Plaintiff,

Case No.: **14K14601**

Complaint for:

10 vs.

1. Civil Code § 52.1;
2. Unreasonable Search and Seizure – Excessive Force (42 U.S.C. Sec. 1983)
3. Failure to Intervene (42 U.S.C. § 1983);
4. Assault & Battery;

11 Culver City Police Officer ROBERT M.
12 CASEY, Culver City Police Officer
13 GERONIMO LOPEZ, JR; CITY OF
14 CULVER; and DOES 1 through 10,
15 inclusive,

OVER \$10,000.00

JURY TRIAL DEMANDED

Defendants.

16 Plaintiff GABRIEL H. AVINA, appearing IN PRO PER, hereby brings this complaint against
17 the above-named Defendants and states and alleges as follows:

18 **I. INTRODUCTION**

19
20 1. This is a civil rights action arising from Defendants' violation of the state and federal
21 civil rights of Plaintiff on February 12, 2014, which included assault, battery, unlawful
22 detention, unlawful search and violation of the Bane Act. This action is brought pursuant to
23 California Civil Code Section 52.1 and 42 USC §§ 1983 and 1988, and the Fourth, and
24 Fourteenth Amendments to the United States Constitution.

25 **II. JURISDICTION**

26 2. Jurisdiction is founded upon Civil Code Section 52.1, 28 USC §§ 1331 and 1343(a)(3)
27 and (4), and the aforementioned statutory and constitutional provisions. Plaintiff is informed and
28 believes and based thereon alleges that the amount in controversy exceeds \$25,000, excluding

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LOS ANGELES SUPERIOR COURT
JOHN A. CLARKE, CLERK

JAN 05 2011
By: _____ DM
DEPUTY
LISA HART COLE

CASE MANAGEMENT CONFERENCE
APR 25 2011
Date
Deth K
gban

8
9 **THE SUPERIOR COURT OF CALIFORNIA**
10 **IN AND FOR THE COUNTY OF LOS ANGELES - SANTA MONICA**

11
12 DAMIEN DAVIS, an individual,
13 Plaintiff,
14 v.
15 CITY OF CULVER CITY, a municipal
16 entity, DOES 1-10, all in their individual
capacities,
17 Defendants.

CASE NO: SC110955
COMPLAINT
CALIFORNIA CONSTITUTION:
ART. 1, SEC 13
CALIFORNIA CIVIL CODE §51.7, 52
AND 52.1
FALSE IMPRISONMENT
ASSAULT
BATTERY

18
19
20
21 **JURISDICTION AND VENUE**

22 1. This action seeks damages for THE violation of plaintiff's right to be free from
23 unlawful seizure and excessive force pursuant to California Civil Code §§51.7 and 52.1,
24 California Constitution Article I, sec. 13, and the torts of assault and battery by defendants.

25 2. Venue is proper in the Santa Monica division as this case involves allegations of
26 civil rights violations, which occurred in Culver City, which is within the geographic jurisdiction
27 of the Los Angeles County Superior Court - Santa Monica.

1 AUSTIN R. DOVE, ESQ. (SBN 180321)
2 LAW OFFICE OF AUSTIN DOVE
3 555 W. 5th Street, 35th Floor
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5 Telephone: (213) 487-8300

6 Attorney for Plaintiff,
7 ANDREAS HERNANDEZ

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CLERK (SBN 180321)
Superior Court of California

DEC 03 2018

Clara M. Grijeka, Executive Officer/Clerk
By: Cristina Grijeka, Deputy

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

11 ANDREAS HERNANDEZ,

12 Plaintiff.

13 v.

14 CITY OF CULVER CITY, CULVER)
15 CITY POLICE DEPARTMENT,)
16 OFFICER WILLIAM KUTYLO,)
17 OFFICER SAM HAWKINS, and DOES 1)
through 50. Inclusive)

18 Defendants.

) Case No.:

18010106996

) COMPLAINT FOR DAMAGES:

-) 1. Negligent Retention
) 2. False Arrest
) 3. False Imprisonment
) 4. Civil Rights Violations (

21 JURISDICTION

22 1. Jurisdiction of this court is invoked under 28 U.S.C. §1343, (1), (2), (3) and (4). This
23 action at law for money damages arises under Title 42 U.S.C. Section 1983, Title 42 U.S.C.
24 Section 1985, and the United States Constitution, the laws of the State of California and common
25 law principles to redress a deprivation under color of state law rights, privileges and immunities
26 secured to Plaintiffs by said statutes, and by the First, Fourth, and Fourteenth Amendments of the
27 United States Constitution.

28 ALLEGATION COMMON TO ALL CAUSES OF ACTIONS

1 **AUSTIN R. DOVE, ESQ. (CAL. SBN 180321)**
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6 **E-mail: dovelawcorp@gmail.com**

7 Attorney for Plaintiff,
8 **ANDREAS HERNANDEZ**

9
10 **UNITED STATES DISTRICT COURT**
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 **ANDREAS HERNANDEZ,**
13 **Plaintiff,**

14 **v.**

15 **CITY OF CULVER CITY, a municipal**
16 **corporation; SCOTT BIXBY, Chief of**
17 **Police, individually and in his official**
18 **capacity; WILLIAM KUTYLO,**
19 **individually and in his official capacity as a**
20 **police officer for the City of Culver City;**
21 **SAM HAWKINS, individually and in his**
22 **official capacity as a police officer for the**
23 **City of Culver City; MAURILIO**
24 **GAMBOA, individually and in his official**
25 **capacity as a police officer for the City of**
26 **Culver City; JOHN BENJAMIN,**
27 **individually and in his official capacity as a**
28 **police officer for the City of Culver City**
and DOES 1 through 50, individually and
in their official capacities, inclusive,

Defendants.

CASE NO.: 2:19-cv-01267-ODW-KS

THIRD AMENDED COMPLAINT FOR
DAMAGES:

1. **False Arrest (42 U.S.C. § 1983)**
2. **Excessive Use of Force (42 U.S.C. § 1983)**
3. **False Imprisonment (42 U.S.C. § 1983)**
4. **Racial Discrimination (42 U.S.C. § 1983 & 42 U.S.C. § 1981)**
5. **Malicious Prosecution (42 U.S.C. § 1983)**
6. **Willful Negligence (42 U.S.C. § 1983 & 42 U.S.C. § 1981)**

DEMAND FOR JURY TRIAL

1 Negar Tehrani, Esq., (SBN 292211)
Tehrani Law Firm
2 512 S. San Vicente Blvd., Suite 4
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3 Tel: (424) 777-0633
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4 E-mail: Negar@tehranilawfirm.com

5 Attorney for Plaintiff:
DOLLY KIOSEA
6

7 UNITED STATES DISTRICT COURT
8 CENTRAL DISTRICT OF CALIFORNIA
9

10 DOLLY KIOSEA, individually,
11 Plaintiff,
12 vs.
13 CULVER CITY; IVAN HERNANDEZ,
14 WILLIAM BROWN, MICHAEL
15 VANHOOK; Culver City Chief of Police
16 SCOTT BIXBY, individually and in his
17 official capacity; and DOES 1 through 10.
18 Defendants.
19
20
21

) Case No.

) COMPLAINT

- 1. *Monell* Liability for Unconstitutional Custom, Policy and Practice (42 U.S.C. § 1983)
- 2. Inadequate Training-Municipal Liability (42 U.S.C. § 1983)
- 3. Intentional Infliction of Emotional Distress (State)
- 4. Negligence (State)
- 5. Violation of Bane Act (Cal. Civil Code §52.1)

22 DEMAND FOR JURY TRIAL
23

24 Plaintiff, DOLLY KIOSEA ("Plaintiff" or "Ms. Kiosea"), upon information and belief,
25 alleges the following:
26
27
28

1 Law Offices of David M. Dudley
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3 Los Angeles, California 90034
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5

6 ATTORNEY FOR PLAINTIFF SHELIEMA LEWIS

7 UNITED STATES DISTRICT COURT
8 CENTRAL DISTRICT OF CALIFORNIA
9 WESTERN DIVISION

10	SHELIEMA LEWIS,)	CIVIL RIGHTS VIOLATION
)	42 U.S.C. § 1983); CONVERSION
11	Plaintiff,)	
	v.)	Case No. 2:17-CV-7635
12	CITY OF CULVER CITY, CULVER CITY)	
13	POLICE DEPARTMENT, SGT. JOHN)	COMPLAINT
	BENJAMIN; OFFICER JONATHON)	
14	FLORES; DETECTIVE JOHN PURNELL;)	PLAINTIFF DEMANDS TRIAL BY JURY
15	SGT. M. VAN HOOK; AND DOES 1-100,)	
	individually and in their capacity as officers of)	
16	the Culver City Police Department or other)	
	agencies,)	
17	Defendants.)	
18)	

19
20 INTRODUCTION

21 1. Plaintiff SHELIEMA LEWIS brings this action against Sgt. John Benjamin, Officer
22 Jonathon Flores, Detective John Purnell, Sgt. M. Van Hook, DOES 1-100 and the Defendant
23 City of Culver CITY ("City") and its police department, the Culver City Police Department
24 ("CCPD"), for damages arising out of racial discrimination, unlawful seizure of property, the
25 taking of property without due process of law, other unconstitutional actions and policies, and a

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Los Angeles Superior Court

NO SUMMONS ISSUED

NOV 18 2010

John A. Clarke, Executive Officer/Clark

By A. WILLIAMS
~~DEPUTY~~

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3 Cameron Fredman (SBN 256034)
4 10866 Wilshire Boulevard, Suite 1400
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6 Tel: (310) 474-1582 Fax: (310) 475-7871

CASE MANAGEMENT CONFERENCE

MAR 08 2011

7 Attorneys for Plaintiffs,
8 *Kandace Simplis et al.*

Date

9 LINDA K. LEFKOWITZ

Dot M & 300m

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF LOS ANGELES

12 KANDACE SIMPLIS; KYRA S., by and through
13 her guardian ad litem KANDACE SIMPLIS; and
14 KAILYNN G., by and through her guardian ad
15 litem KANDACE SIMPLIS.

CASE NO. SC110399

COMPLAINT

16 Plaintiffs,

17 vs.

18 CULVER CITY POLICE DEPARTMENT; CITY
19 OF CULVER CITY; CHIEF DON PEDERSEN, in
20 his official and individual capacities; and DOES 1
21 through 100, inclusive,

22 Defendants.

- 23 1. Wrongful Death
(Cal. Civ. Proc. Code § 377.60)
- 24 2. Violation of Due Process
(42 U.S.C. § 1983)
- 25 3. Excessive Use of Force
(42 U.S.C. § 1983)
- 26 4. Intentional Infliction of Emotional Distress
- 27 5. Negligent Infliction of Emotional Distress

28 JURY TRIAL DEMANDED

1 Mark R. McKinniss, Esq., State Bar No. 228201
10866 Washington Blvd., #403
2 Culver City, CA 90232
Telephone Number: (310) 880-6376
3 Facsimile Number: (310) 837-6734

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Los Angeles Superior Court

OCT 28 2013

4 Attorneys for Plaintiff
BENNIE DASHON STORY

John A. Clarke, Executive Officer/Clerk
By SHAURYA WESLEY Deputy

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA **BC 525910**
8 FOR THE COUNTY OF CULVER CITY
9 CENTRAL DISTRICT – Unlimited Jurisdiction

10 BENNIE DASHON STORY, an individual;

Case No.:

11 Plaintiffs

COMPLAINT FOR DAMAGES FOR:

12 vs.

- 1) ASSAULT
- 2) BATTERY
- 3) BATTERY
- 4) NEGLIGENT SUPERVISION
- 5) NEGLIGENCE
- 6) INTENTIONAL INFLICTION OF EXTREME EMOTIONAL DISTRESS

14 CITY OF CULVER CITY, a municipal entity; and
15 DOES 1 through 100, inclusive

17 Defendants

20 Plaintiff BENNIE DASHON STORY, hereinafter Plaintiff, hereby alleges as follows:

- 21 1. This action involves assault, battery, and intentional infliction of extreme emotional distress by
- 22 Defendant City of Culver City, through its agent and servant the Culver City Police Department
- 23 (CCPD).
- 24
- 25 2. At all times relevant herein Plaintiff resided in the County of Los Angeles. At all times relevant
- 26 herein Defendant City of Culver City was a municipality in the County of Los Angeles, and the
- 27 CCPD was the servant and agent of said municipality in Los Angeles County as well.
- 28

OCT 19 2010

John A. Clarke, Executive Officer/Clerk

By Jennifer Denham, Deputy

1 JACQUES BEUGELMANS, SBN 70166
2 Attorney at Law
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4 24th Floor
5 Los Angeles, CA 90067-6021
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8 jacques@covad.net (e-mail)

9 Attorney for Plaintiff

CASE MANAGEMENT CONFERENCE

Dep M FEB 07 2011 @ 8:30
Date

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 FOR THE COUNTY OF LOS ANGELES

LINDA K. LEFKOWITZ

12 GRACIE THOMPSON,

13 Plaintiff,

14 vs.

15 CITY OF CULVER CITY, CULVER CITY
16 POLICE DEPARTMENT OFFICER MYERS,
17 BADGE NO. 00869, and DOES 1 through
18 10, Inclusive,

19 Defendants.

20) CASE NO. SC110030
21)
22) COMPLAINT FOR BATTERY BY
23) PEACE OFFICER; USE
24) OF EXCESSIVE FORCE IN
25) VIOLATION OF CIVIL
26) RIGHTS
27) (CALIFORNIA CIVIL CODE
28) SECTION 52.1)
)
) (Unlimited Civil Case)

Plaintiff, GRACIE THOMPSON, alleges as follows:

1. Plaintiff is ignorant of the true names or capacities, whether individual, corporate, partnership or otherwise, of defendants sued herein as DOES 1 through 10, Inclusive, each and all, and therefore sues said defendants by such fictitious names. Plaintiff is informed and believes, and thereon alleges, that each such fictitiously named defendant was responsible for the errors and/or omissions hereinafter alleged to have proximately caused injury and damages to plaintiff. Plaintiff is further informed and

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4 San Fernando, CA 91340
5 310.849.4556
6 9thcircuitplaintiff@gmail.com

7 **UNITED STATES DISTRICT COURT**
8 **CENTRAL DISTRICT OF CALIFORNIA-WESTERN DIVISION**

9 Jonathan VanLoan,
10 Plaintiff,

11 v.

12 The Nation of Islam, Louis Farrakhan, Tony) NO.: CV20-00127
13 Muhammad, The City of Torrance, CA, Eve)
14 Irvine, Tyrone Gribben, Brian McGee, Patrick) COMPLAINT FOR DAMAGES
15 Sullivan, Patrick Furey, George Chen, Tim) CIVIL RIGHTS: 42 U.S.C. 1983
16 Goodrich, Mike Griffiths, Milton Herring,) COMMON LAW TORTS
17 Aurelio Mattucci, Geoff Rizzo, Providence) JURY TRIAL DEMANDED
18 Health & Services, Rodney F. Hochman, Garry) INJUNCTIVE RELIEF
19 Olney, Richard Glimp, The City of Culver City,)
20 CA, Thomas Small, Meghan Sahli-Wells, Goran)
21 Erikkson, Scott Bixby, Ryan Thompson,)
22 Michael VanHook, Steven Armenta, James)
23 Gladden, Sean Fowler, Michael Klepin, Mir)
24 Nawaz Karim, Jason Driver, Southern California)
25 Hospital, Prospect Medical Holdings, Inc.,)
26 Samuel Lee, Leonard Green & Partners, Lisa)
27 Kahn, Marat Shpolyansky, The City of Santa)
28 Monica, CA, Kenneth Semko, Gleam Davis,)
Terry O'Day, Tony Vazquez, Kevin McKeown,)
Sue Himmelrich, Ted Winterer, American Youth)
Hostels, Inc., Hostelling International,)
Kimberly Turner, Michael Tolwin, Providence)
Little Company of Mary Medical Center Torrance,))
Prospect Medical Group, Tolwin Psychiatric)
Medical Group, Inc., Jonathan Reitman, M.D., &)
Steve Soboroff, in his official and individual)
capacities,)
Defendants.)

1 THE SEHAT LAW FIRM, P.L.C.
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8 Attorney for Plaintiff, Terry Walton

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

10 TERRY WALTON, individually,

11
12 Plaintiff,

13 vs.

14 CULVER CITY, a governmental entity;
15 MICHAEL KUTYLO, individually;
16 JAMES GLADDEN, individually; MASON
17 MCCORMICK, individually; THOMAS
18 CALL, individually; CULVER CITY
19 CHIEF OF POLICE SCOTT BIXBY,
20 individually and in his official capacity; and
21 DOES 1 through 10,

22 Defendants.

Case No.: _____

COMPLAINT FOR DAMAGES

1. Unreasonable Search and Seizure - Excessive Force (42 U.S.C. § 1983)
2. *Monell* Liability for Custom, Policy and Practice (42 U.S.C. § 1983)
3. Failure to Train (42 U.S.C. § 1983)
4. Negligent Hiring, Training, Supervision (State)
5. Battery (State)
6. Intentional Infliction of Emotional Distress (State)
7. Negligence (State)

DEMAND FOR JURY TRIAL

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NOV 29 2010
CENTRAL DISTRICT OF CALIFORNIA
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11 *Attorneys for Plaintiff*

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA

14 MICHAEL EARL WATERS

Case No. CV10-9160 SJO
MAN

15 *Plaintiff,*

16 vs.

17 THE CITY OF CULVER CITY, BROTMAN
18 MEDICAL CENTER INCORPORATED,
19 DON PEDERSEN, ADAM TREANOR,
20 JESSE BUTLER, SCOTT NARIMATSU
21 AND DOES 1 THROUGH 10

- COMPLAINT FOR DAMAGES FOR:
1. VIOLATION OF CIVIL RIGHTS
42 U.S.C. § 1983, First Amendment
 2. VIOLATION OF CIVIL RIGHTS
42 U.S.C. § 1983, Fourth
Amendment (Unreasonable Seizure,
Use of Force and Search)
 3. VIOLATION OF CIVIL RIGHTS,
42 U.S.C. §§ 1983, 1985, 1986
(Conspiracy to Violate Civil Rights)
 4. VIOLATION OF CIVIL RIGHTS
42 U.S.C. § 1983 Municipal
Liability Unconstitutional Practice,
Custom, or Policy (*Monell*)
 5. VIOLATION OF CIVIL RIGHTS
42 U.S.C. § 1983 Municipal (*City of
Canton*) and Individual Supervisory
Liability (*Larez*) (Failure to train,
supervise, discipline)

22 *Defendants.*

SUPPLEMENTAL STATE CLAIMS

6. Assault
7. Battery
8. False Arrest/ False Imprisonment
9. Negligence
10. Intentional Infliction of Emotional
Distress
11. Violation of Civil Rights (Cal. Civ.
Code §§ 51.7, 52.1, inter alia.)

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