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I. INTRODUCTION

1. Both the federal and state constitutions forbid law enforcement officers from using excessive force in their execution of search warrants. Despite this, on November 2, 2021, the defendant officers formed a squad of at least ten officers to execute a warrant at the home of plaintiffs Arash Eteghaei and Mitra Zade (collectively “plaintiffs”), who are indisputably innocent of any criminal wrongdoing, with an extreme and excessive show of force. The officers came to plaintiffs’ home with sirens blazing, guns drawn and loudspeaker commands to exit the home, even though they had already called Mr. Eteghaei to tell him this, which he did moments later. The officers knew that plaintiffs were innocent of any wrongdoing, as the warrant was being executed against their son, yet they pointed guns at plaintiffs’ faces and handcuffed them, despite their cooperation. Worse still, the officers placed handcuffs on plaintiff Zade so tightly that she suffered visible injuries to her wrists. The apparent motivation for the officers to use this unwarranted show of force was to embarrass the plaintiffs in front on their neighbors and place them in unnecessary fear, which the Constitution forbids. While the Constitution allows law enforcement officers to execute search warrants in a reasonable manner, it does not allow them to employ warrants to embarrass, humiliate and make a spectacle of innocent residents and to scare them. It also does not permit officers to detain or arrest persons without reasonable suspicion or probable cause. This action is filed to contest defendants’ gratuitous display (and use) of force and to prevent what happened to plaintiffs from happening to others.

II. JURISDICTION AND VENUE

25 2. Plaintiffs bring this action to redress the deprivation of constitutional rights
26 secured to them, and others, by the Fourth Amendment to the United States Constitution (42
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1 U.S.C. § 1983) and Article I, Section 7 of the California Constitution. It also seeks to redress the
2 deprivation of plaintiffs statutory rights and common law torts under State law.

3 3. This Court has subject matter jurisdiction over this matter pursuant to Article VI,
4 Section 10 of the California Constitution, Cal. Code of Civil Procedure § 88; Cal. Civil Code §
5 52.1; 28 U.S.C. §§ 1331 and 1343; and 42 U.S.C. §§ 1983, 1985, 1986 and 1988. This court has
6 concurrent jurisdiction over the federal causes of action. (*Williams v. Horvath* (1976) 16 Cal.3d
7 834, 837.)

9 4. This Court has personal jurisdiction over each of the defendants, as they operate
10 or do business within the County of Alameda, which is within this judicial district. (See Code of
11 Civil Procedure, § 88.)

12 5. On April 25, 2022, plaintiffs filed an administrative claim with the County of
13 Alameda, in compliance with California Government Code Sections 910 *et seq.* That claim was
14 rejected by the County as a matter of law on May 30, 2022, since the County failed to act upon it
15 with 45 days. (Cal. Govt. Code, § 912.4, subd. (c).) This complaint is filed on June 17, 2022, so
16 this action is timely.
17

18 6. On May 2, 2022, plaintiffs filed an administrative claim with the University of
19 California, Santa Barbara (“UCSB”) Risk Management and Insurance Office, in compliance with
20 California Government Code Sections 910 *et seq.* That claim was rejected by UCSB as a matter
21 of law on June 16, 2022, since UCSB failed to act upon it with 45 days. (Cal. Govt. Code, §
22 912.4, subd. (c).) This complaint is filed on June 17, 2022, so this action is timely.
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24 7. Venue is proper in this judicial district because the events giving rise to the
25 complaint occurred in the County of Alameda, which is in this judicial district. (See Code of
26 Civil Procedure, §§ 392, 394 & 395).
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III. THE PARTIES

A. Plaintiffs

8. Plaintiff ARASH ETEGHAEI (“Eteghaei”) was a resident of the County of Alameda at all relevant times. He is a fifty-one-year-old father who is married to plaintiff Mitra Zade. Neither has any criminal history or has been accused of any criminal wrongdoing.

9. Plaintiff MITRA ZADE (“Zade”) was a resident of the County of Alameda at all relevant times. She is a fifty-two-year-old mother who is married to plaintiff Eteghaei. Neither has any criminal history or has been accused of any criminal wrongdoing.

B. Defendants

10. Defendant COUNTY OF ALAMEDA (“Alameda” or “County”) is, and at all times mentioned herein was, a municipal corporation within the State of California.

11. Defendant SHERIFF GREGORY J. AHERN is, and at all times mentioned herein was, the Sheriff of El Dorado County. He is sued in his individual and official capacities.

12. Defendant LT. FARRUGGIA (“Farruggia”) is, and at all times mentioned herein was, a Deputy Sheriff with the County of Alameda. He is sued in his individual and official capacities.

13. Defendant OFR. SCOTT BRANDON (“Brandon”) is, and at all times mentioned herein was, a Deputy Sheriff with the County of Alameda. He is sued in his individual and official capacities.

14. Defendant OFR. R. WALTER (“Walter”) is, and at all times mentioned herein was, a Deputy Sheriff with the County of Alameda. He is sued in his individual and official capacities.

1 15. Defendant DET. A. MATEEN (“Mateen”) is, and at all times mentioned herein
2 was, a Deputy Sheriff with the County of Alameda. He is sued in his individual and official
3 capacities.

4 16. Defendant OFR. J. DORMER (“Dormer”) is, and at all times mentioned herein
5 was, a Deputy Sheriff with the County of Alameda. He is sued in his individual and official
6 capacities.

7 17. Defendant OFR. M. MONCADA (“Moncada”) is, and at all times mentioned
8 herein was, a Deputy Sheriff with the County of Alameda. He is sued in his individual and
9 official capacities.
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11 18. Defendant OFR. JOSHUA ARMILLO (“Armillo”) is, and at all times mentioned
12 herein was, a Deputy Sheriff with the County of Alameda. He is sued in his individual and
13 official capacities.
14

15 19. Defendant UNIVERSITY OF CALIFORNIA, SANTA BARBARA (“UCSB”) is,
16 and at all times mentioned herein was, an entity of unknown form within the State of California.
17

18 20. Defendant SGT. G. LEVETTE (“Levette”) is, and at all times mentioned herein
19 was, an officer with the UCSB Police Department (“UCSBPD”). He is sued in his individual
20 and official capacities.

21 21. Defendant OFR. AVILA is, and at all times mentioned herein was, an officer with
22 the UCSB Police Department (“UCSBPD”). She is sued in his individual and official capacities.
23

24 22. Defendant OFR. SAMANIEGO (“Samaniego”) is, and at all times mentioned
25 herein was, an officer with the UCSB Police Department (“UCSBPD”). She is sued in her
26 individual and official capacities.
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1 23. Plaintiffs are ignorant of the true names of defendants sued herein as DOES 1
2 through 50, inclusive, and therefore sue said defendants by such fictitious names. Plaintiff will
3 amend this complaint to allege their true names and capacities when ascertained. Plaintiff is
4 informed and believes and therefore alleges that each of the Doe defendants is legally
5 responsible and liable for the injuries and damages hereinafter set forth, and that each of the said
6 defendants proximately caused said injuries and damages by reason of their violation of
7 constitutional and legal rights.
8

9 24. Each of the defendants caused and is responsible for the below-described
10 unlawful conduct and resulting injuries by, among other things: personally participating in the
11 unlawful conduct or acting jointly or conspiring with others who did so by authorizing,
12 acquiescing or setting in motion policies, plans or actions that led to the unlawful conduct; by
13 failing to take action to prevent the unlawful conduct; and by ratifying the unlawful conduct that
14 occurred by agents and officers under their discretion and control, including failing to take
15 remedial steps or disciplinary action. In doing the acts alleged herein, defendants and each of
16 them had a duty to protect the health and safety of the Plaintiff, and they failed to exercise due
17 care in the enforcement of that duty.
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20 25. In doing the acts alleged herein, Defendants and each of them acted as the agent,
21 servant, employee, partner, joint-venturer, co-conspirator and/or in concert with each of said
22 other defendants; and in engaging in the conduct hereinafter alleged, were acting with the
23 permission, knowledge, consent and ratification of their co-defendants, and each of them.
24

25 26. In engaging in the conduct described herein, Defendants acted under color of law
26 and in the course and scope of their employment with the County. In engaging in the conduct
27 described herein, Defendants exceeded the authority vested in them as police officers under the
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1 United States and California Constitutions and as police officers employed by Defendant
2 County.

3 27. The acts and omissions of Defendants as set forth herein were pursuant to the
4 customs, policies, practices, and procedures of County of Alameda and its Sheriff's Department
5 and/or the University of California, Santa Barbara and its Police Department.
6

7 28. Defendants' acts were willful, wanton, malicious and oppressive and done with
8 conscious disregard and deliberate indifference to plaintiffs' rights, thereby justifying the award
9 of exemplary and punitive damages.

10 **IV. FACTS APPLICABLE TO ALL CAUSES OF ACTION**

11 29. Plaintiffs' son Arian has been accused of crimes while attending the University of
12 California, Santa Barbara. In search of Arian's cellphone and to arrest him, defendants executed
13 a warrant at the home of Arian's parents, plaintiffs Eteghaei and Zade, on November 2, 2021.
14 Neither Eteghaei nor Zade has any criminal history or has been accused of any wrongdoing, and
15 the defendants knew this when they executed the warrant.
16

17 30. Despite the fact that neither the plaintiffs nor Arian posed any risk to the officers,
18 they assembled a team of at least ten officers to execute a search warrant for a cellphone at the
19 home that plaintiffs had lived in for 16 years.
20

21 31. The officers came with a full show of force. They blared their sirens, issued
22 commands over a loudspeaker, and arrived with guns drawn.
23

24 32. When Eteghaei exited his home in compliance with the defendants' commands in
25 his bare feet, one officer pointed a gun in his face and other officers handcuffed him.

26 33. They did the same to Zade when she exited the house, after she requested that
27 defendants produce a search warrant.
28

1 34. Furthermore, the defendants placed the handcuffs on Zade so tightly that she
2 suffered visible injuries to her wrists.

3 35. Defendants’ gratuitous and extreme use of force was unnecessary and was
4 designed to embarrass and humiliate the plaintiffs in front of their neighbors.

5 36. Their seizures of the plaintiffs without reasonable suspicion or probable cause
6 also violates the Fourth Amendment and Article I, Section 7 of the California Constitution.

7 37. An actual and substantial controversy exists between plaintiffs and defendants as
8 to their respective legal rights and duties. Plaintiffs contend that the defendants’ excessive use of
9 force and improper seizures are unlawful and unconstitutional, and malicious and wanton,
10 thereby warranting the imposition of punitive damages. Defendants contend the opposite.

11 38. If not enjoined by the Court, defendants will continue to commit similar
12 constitutional violations, in derogation of the rights of plaintiffs and other similarly situated
13 individuals. Such conduct, if left unchecked, will inflict irreparable injury on the plaintiffs and
14 other persons.

15 39. Plaintiffs have no plain, speedy, and adequate remedy at law.

16 40. Plaintiffs have exhausted their administrative remedies. (See *supra* at p. 3, ¶¶ 5,
17 6.)

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V. CAUSES OF ACTION

FIRST CAUSE OF ACTION

Violation of Plaintiffs' Fourth Amendment Rights (42 U.S.C. §§ 1983) --

Unreasonable Seizure

(Against All Defendants)

41. Plaintiffs reallege and incorporate by reference paragraphs 1 through 40 of this Complaint as though fully alleged herein.

42. Defendants' seizure of plaintiffs was unconstitutional under the Fourth Amendment to the United States Constitution, as described below.

43. The defendant officers unreasonably detained plaintiffs in their execution of the search warrant because they did so without reasonable suspicion that either plaintiff had committed a crime or posed a threat.

44. By pointing guns at the plaintiffs, handcuffing them, and forcing Mrs. Zade into a law enforcement vehicle, the defendants falsely arrested the plaintiffs without probable cause

45. As a direct and proximate result of defendants' illegal conduct, plaintiffs suffered actual injuries and damages.

46. The acts and omissions alleged in this Complaint are indicative and representative of a repeated course of conduct by defendant County of Alameda tantamount to a custom, policy or practice of condoning and tacitly encouraging the disregard for the constitutional rights of Alameda County citizens, as described herein. The County is, therefore, liable under *Monell v. Dep't of Soc. Serv. of the City of New York*, 429 U.S. 1071 (1977).

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SECOND CAUSE OF ACTION

Violation of Plaintiffs' Fourth Amendment Rights (42 U.S.C. §§ 1983) --

Excessive Force in the Execution of the Search Warrant

(Against All Defendants)

47. Plaintiffs reallege and incorporate by reference paragraphs 1 through 46 of this Complaint as though fully alleged herein.

48. Defendants' execution of the search warrant at plaintiffs' residence involved an excessive and unreasonable show and use of force.

49. *First*, the defendant officers exhibited unreasonable and excessive show of force by employing multiple vehicles with sirens, using loudspeaker commands, pointing guns at the defendants, and handcuffing them in front of their neighbors while executing the warrant.

50. *Second*, and more particularly, defendants used excessive force in executing the search warrant by arbitrarily pointing their guns at the faces of Mr. Eteghaei and Mrs. Zade when they peacefully exited their home in compliance with the officers' commands. (*See, e.g., Thompson v. Rahr*, 885 F.3d 582, 587 (9th Cir. 2018) ("pointing guns at persons who are compliant and present no danger is a constitutional violation") (quoting *Baird v. Renbarger*, 576 F.3d 340, 346 (7th Cir. 2009)); *Tekle v. United States*, 511 F.3d 839, 845 (9th Cir. 2007) ("We have held that the pointing of a gun at someone may constitute excessive force, even if it does not cause physical injury"); *Baldwin v. Placer County*, 418 F.3d 966, 970 (9th Cir. 2005) (rejecting qualified immunity claim of officers for excessive force claim in execution of warrant; defendants "violated the civil right of the plaintiffs to be free from battery by gun-wielding officers, a right established in this circuit since 1984") (citing *McKenzie v. Lamb*, 738 F.2d 1005, 1010 (9th Cir. 1985) (Kennedy, J.).)

1 51. *Third*, the defendant officers used excessive force in executing the search warrant
2 by handcuffing Mr. Eteghaei and Mrs. Zade when they peacefully exited the home. (*See, e.g.,*
3 *Meredith v. Erath*, 342 F.3d 1057, 1063 (9th Cir. 2003) (“Our decision today makes it clear that
4 [handcuffing a person and detaining her in handcuffs during a search for evidence], absent
5 justifiable circumstances, will result in a Fourth Amendment violation.”).)

6 52. *Fourth*, the defendant officers used excessive force against Mrs. Zade by placing
7 handcuffs on her so tightly as to cause noticeable physical injuries to her wrists.

8 53. *Fifth*, the defendant officers unreasonably detained plaintiffs in their execution of
9 the search warrant by pointing guns at them, handcuffing them, and forcing Mrs. Zade into a law
10 enforcement vehicle reasonable suspicion or probable cause. (*See, e.g., Franklin v. Foxwith*, 31
11 F.3d 873, 876 (9th Cir. 1994) (a detention may be unlawful under the Fourth Amendment “either
12 because the detention itself is [unreasonable] or because it is carried out in an unreasonable
13 manner”).)

14 54. Defendants did the aforesaid acts under color of law, purportedly in performing
15 their official duties.

16 55. As a direct and proximate result of defendants’ illegal conduct, plaintiffs suffered
17 actual injuries and damages.

18 56. The acts and omissions alleged in this Complaint are indicative and representative
19 of a repeated course of conduct by defendant County of Alameda tantamount to a custom, policy
20 or practice of condoning and tacitly encouraging the disregard for the constitutional rights of
21 Alameda County citizens, as described herein. The County is, therefore, liable under *Monell v.*
22 *Dep’t of Soc. Serv. of the City of New York*, 429 U.S. 1071 (1977).
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1 **THIRD CAUSE OF ACTION**

2 **Conspiracy to Violate Plaintiffs' Fourth Amendment Rights (42 U.S.C. §§ 1983 and 1985)**

3 **(Against All Defendants)**

4 57. Plaintiffs reallege and incorporate by reference paragraphs 1 through 56 of this
5 Complaint as though fully alleged herein.

6
7 58. Defendants conspired with each other to violate the civil rights of plaintiffs, in
8 particular, the Fourth Amendment right to be free from excessive force and unreasonable
9 searches and seizures.

10 59. Defendants did the aforesaid acts under color of law, purportedly in performing
11 their official duties.

12
13 60. By conspiring to execute the search warrant at plaintiffs' residence in an
14 excessive and unreasonable manner, defendants violated the Fourth Amendment to the United
15 States Constitution, which is a violation of 42 U.S.C. §§ 1983 and 1985.

16 **FOURTH CAUSE OF ACTION**

17 **Violation of 42 U.S.C. § 1986**

18 **(Against All Defendants)**

19
20 61. Plaintiffs reallege and incorporate by reference paragraphs 1 through 60 of this
21 complaint as though fully set forth herein.

22 62. The Fourth Amendment to the United States Constitution prohibits unreasonable
23 searches and seizures, as well as the use of excessive force, in executing search warrants

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25 63. By planning and failing to prevent their officers from executing the search
26 warrant in an unconstitutional manner, defendants violated 42 U.S.C. § 1986.

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SIXTH CAUSE OF ACTION

Violation of California Constitution, article 1, § 7, subdivision (a)

(Against All Defendants)

72. Plaintiffs reallege and incorporate by reference paragraphs 1 through 71 of this complaint as though fully set forth herein.

73. Article 1, section 7, subdivision (a) of the California Constitution prohibits unreasonable searches and seizures, as well as the use of excessive force, in executing search warrants.

74. By seizing plaintiffs without reasonable suspicion or probable cause and executing the search in the excessive and unlawful manner, defendants violated article 1, section 7 of the California Constitution.

75. As a direct and proximate result of defendants' illegal conduct, plaintiffs suffered actual injuries and damages.

76. The acts and omissions alleged in this Complaint are indicative and representative of a repeated course of conduct by defendant County of Alameda tantamount to a custom, policy or practice of condoning and tacitly encouraging the disregard for the constitutional rights of Alameda County citizens, as described herein. The County is, therefore, liable under *Monell v. Dep't of Soc. Serv. of the City of New York*, 429 U.S. 1071 (1977).

SEVENTH CAUSE OF ACTION

Violation of California Civil Code § 52.1

(Against All Defendants)

77. Plaintiffs reallege and incorporate by reference paragraphs 1 through 76 of this complaint as though fully set forth herein.

1 78. Article 1, section 7, subdivision (a) of the California Constitution prohibits
2 unreasonable searches and seizures, as well as the use of excessive force, in executing search
3 warrants. So, too, do the Fourth and Fourteenth Amendments to the United States Constitution.

4 79. By executing the search in the excessive and unlawful manner described above,
5 preceded by threats, intimidation, coercion, and an illegal detention/arrest, defendants interfered
6 with, and attempted to interfere by threats, intimidation and coercion with plaintiffs' peaceable
7 enjoyment of the rights secured to them by the federal and state constitutions, in violation of the
8 Bane Civil Rights Act, Cal. Civil Code section 52.1.

9
10 80. As a direct and proximate result of defendants' illegal conduct, plaintiffs suffered
11 actual injuries and damages.

12
13 81. The acts and omissions alleged in this Complaint are indicative and representative
14 of a repeated course of conduct by defendant County of Alameda tantamount to a custom, policy
15 or practice of condoning and tacitly encouraging the disregard for the constitutional rights of
16 Alameda County citizens, as described herein.

17
18 82. Under California Government Code section 820(a), the individual officer
19 defendants are liable for damages for their own misconduct.

20 83. Under California Government Code section 815.2(a), the public entity employers
21 are vicariously liable for conduct performed within the scope and course of defendants'
22 employment.

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2 **EIGHTH CAUSE OF ACTION**

3 **Conspiracy to Violate California Civil Code § 52.1**

4 **(Against All Defendants)**

5 84. Plaintiffs reallege and incorporate by reference paragraphs 1 through 83 of this
6 complaint as though fully set forth herein.
7

8 85. Article 1, section 7, subdivision (a) of the California Constitution prohibits
9 unreasonable searches and seizures, as well as the use of excessive force, in executing search
10 warrants. So, too, does the Fourth and Fourteenth Amendments to the United States
11 Constitution.
12

13 86. By conspiring to execute the search in the excessive and unlawful manner
14 described above, preceded by threats intimidation and coercion, defendants interfered with, and
15 attempted to interfere by threats, intimidation and coercion with plaintiffs' peaceable enjoyment
16 of the rights secured to them by the federal and state constitutions, in violation of the Bane Civil
17 Rights Act, Cal. Civil Code section 52.1.
18

19 87. As a direct and proximate result of defendants' illegal conduct, plaintiffs suffered
20 actual injuries and damages.

21 88. The acts and omissions alleged in this Complaint are indicative and representative
22 of a repeated course of conduct by defendant County of Alameda tantamount to a custom, policy
23 or practice of condoning and tacitly encouraging the disregard for the constitutional rights of
24 Alameda County citizens, as described herein.
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26 89. Under California Government Code section 820(a), the individual officer
27 defendants are liable for damages for their own misconduct.
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TENTH CAUSE OF ACTION

ASSAULT

(Against All Defendants)

95. Plaintiffs reallege and incorporate by reference paragraphs 1 through 94 of this Complaint as though fully alleged herein.

96. The defendants acted with the intent to cause harmful or offensive conduct by pointing their excessive display of force in executing the plaintiffs, pointing guns at them and handcuffing them.

97. The plaintiffs reasonably believed that they were about to be touched, or worse, in a harmful or offensive manner.

98. As a direct and proximate result of the said wrongful conduct and/or omissions of defendants, plaintiffs suffered actual injuries and damages.

99. Under Government Code § 820(a), the individual officer defendants are liable for their own misconduct.

100. Under Government Code § 815.2(a), the public entity are vicariously liable for conduct performed by the individual officers within the scope and course of their employment.

ELEVENTH CAUSE OF ACTION

BATTERY

(Against All Defendants)

101. Plaintiffs reallege and incorporate by reference paragraphs 1 through 100 of this Complaint as though fully alleged herein.

102. The defendants touched, caused to be touched, or threatened to touch plaintiffs with the intent to harm or offend them.

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THIRTEENTH CAUSE OF ACTION

NEGLIGENCE -- INFLICTION OF EMOTIONAL DISTRESS

(Against All Defendants)

113. Plaintiffs reallege and incorporate by reference paragraphs 1 through 112 of this Complaint as though fully alleged herein.

114. Plaintiffs suffered severe emotional distress as a result of perceiving injuries to each other.

115. Defendants conduct, as described above, negligently caused injury to plaintiffs.

116. Plaintiffs were present at the scene when each of them suffered injury as a result of defendants' conduct.

117. Defendants were aware they were causing injury to plaintiffs.

118. Plaintiffs suffered serious emotional distress.

119. Defendants' conduct was a substantial factor in causing plaintiffs' serious emotional distress.

120. Under Government Code § 820(a), the individual officer defendants are liable for their own misconduct.

121. Under Government Code § 815.2(a), the public entity are vicariously liable for conduct performed by the individual officers within the scope and course of their employment.

FOURTEENTH CAUSE OF ACTION

NEGLIGENCE

(Against All Defendants)

122. Plaintiffs reallege and incorporate by reference paragraphs 1 through 122 of this Complaint as though fully alleged herein.

1 123. Defendants owed a duty of care to plaintiffs.

2 124. Defendants breached this duty of care to plaintiffs by the conduct described
3 above.

4 125. As a direct and proximate result of defendants' conduct and failure to act,
5 plaintiffs suffered actual injuries and damages.

6 126. Under Government Code § 820(a), the individual officer defendants are liable for
7 their own misconduct.

8 127. Under Government Code § 815.2(a), the public entity are vicariously liable for
9 conduct performed by the individual officers within the scope and course of their employment.
10

11 **FIFTEENTH CAUSE OF ACTION**

12 **FALSE IMPRISONMENT**

13 **(Against All Defendants)**

14 128. Plaintiffs reallege and incorporate by reference paragraphs 1 through 127 of this
15 Complaint as though fully alleged herein.
16

17 129. The defendants intentionally deprived plaintiffs by the use or threatened use of
18 force.
19

20 130. The detention of plaintiffs compelled plaintiffs to stay or go somewhere for some
21 appreciable time.

22 131. Plaintiffs did not voluntarily consent to the detention.

23 132. Plaintiffs were actually harmed by the false imprisonment.

24 133. Defendants' conduct was a substantial factor in causing plaintiffs' harm.

25 134. Under Government Code § 820(a), the individual officer defendants are liable for
26 their own misconduct.
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1 anyone and seizing their property without advance notice of at least three (3) days and the
2 opportunity for a meaningful hearing;

3 4. A preliminary and permanent injunction, enjoining the defendants and their
4 agents and employees from taking continued action against anyone under the Cultivation
5 Ordinance where defendants failed to secure a warrant and/or failed to provide advance notice;
6

7 5. Compensatory damages in an amount no less than \$50,000 and punitive damages,
8 according to proof;

9 6. Costs and attorneys fees incurred in this action; and

10 7. Such other and further relief as this Court may be just and proper.
11

12
13 DATED: June 17, 2022

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16 JOSEPH D. ELFORD
17 Counsel for Plaintiffs
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VERIFICATION

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2 I declare that my offices are located in the County of San Francisco, which is not the
3 same county as the named plaintiffs, so I verify this Complaint on their behalf. My
4 investigation, combined with the individual declarations, support my verification of the facts
5 alleged in the instant complaint.
6

7 I declare under penalty of perjury under the laws of the United States that the foregoing is
8 true and correct.

9 Executed this 17th day of June, in San Francisco, California.

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12 JOSEPH D. ELFORD
13 Counsel for Plaintiffs
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DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial of this action.

DATED: June 17, 2022



JOSEPH D. ELFORD
Counsel for Plaintiffs

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