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7 Attorneys for Plaintiff
8 DANIELLE SOULE

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

12 DANIELLE SOULE

13 Plaintiff,

14 v.

15 CITY OF LOS ANGELES, LAPD
16 POLICE CHIEF JIM MCDONNELL IN
17 INDIVIDUAL AND OFFICIAL
18 CAPACITY, LAPD OFFICER GARY
19 COPELAND (#30877), LAPD OFFICER
20 RUBEN RODRIGUEZ (#38654), and
DOES 1 through 10,

21 Defendants.

Case No.: 2:26-cv-05455

COMPLAINT FOR DAMAGES

1. 42 U.S.C. § 1983 Fourth Amendment Excessive Force
2. 42 U.S.C. § 1983 Fourth Amendment Failure To Intervene
3. 42 U.S.C. § 1983 First Amendment Retaliation
4. Bane Act (Cal. Civ. Code § 52.1)
5. Assault
6. Battery
7. Negligence
8. Intentional Infliction of Emotional Distress

[DEMAND FOR JURY TRIAL]

I. INTRODUCTION

1
2 1. On October 18, 2025, Los Angeles Police Department (“LAPD”) Officers
3 mounted high on police horseback forcefully bludgeoned Plaintiff Danielle Soule on top
4 of her head with a police wooden bokken baton (“baton”), splitting open her scalp.
5 Plaintiff Soule was calmly filming the Officers while dispersing in the direction they
6 pushed her towards. Plaintiff Soule had committed no crime. She was simply exercising
7 her First Amendment right to peaceably assemble at the “No Kings” Protest and to
8 document police activity. Despite Plaintiff Soule dispersing down the street, Defendant
9 Officers still used their 1,000-pound horses to terrify and intimidate her, then used their
10 heightened position while on horseback to forcefully bludgeon her on top of her head,
11 causing severe injury.

12 2. Plaintiff Soule suffered severe pain, disorientation, and fear. Plaintiff Soule
13 required immediate medical attention, receiving six staples in her head to close the
14 gaping wound. For weeks afterwards, she was bedridden with constant dizziness and
15 unable to stand for more than a few minutes at a time. She had almost constant severe
16 headaches, light sensitivity, disorientation, and had developed a new fear of animals and
17 police. She was diagnosed with post concussive syndrome and severe concussion. To
18 this day, Plaintiff Soule suffers from headaches, light sensitivity, dizziness, and
19 psychological trauma.

20 3. Plaintiff brings this action for damages against Defendants for general,
21 compensatory, statutory and punitive damages, costs and attorneys’ fees, and
22 declaratory relief resulting from Defendants’ unlawful and egregious conduct, as
23 alleged herein. Additionally, Plaintiff seeks punitive damages against the individual
24 Defendants.

II. JURISDICTION AND VENUE

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26 4. This Complaint seeks damages for violations of the civil rights, privileges
27 and immunities guaranteed by the First, Fourth and Fourteenth Amendments of the
28 United States Constitution, pursuant to 42 U.S.C. § 1983, and for violations of

1 California state law.

2 5. This Court has jurisdiction over this lawsuit pursuant to 28 U.S.C. §§ 1331
3 and 1343.

4 6. This Court has supplemental jurisdiction over the state law claims asserted
5 herein pursuant to 28 U.S.C. § 1367, because the claims form part of the same case or
6 controversy arising under the United States Constitution and federal law.

7 **III. VENUE**

8 7. Plaintiff's claims arose in the County of Los Angeles, California. Venue
9 therefore lies in the Central District of California pursuant to 28 U.S.C. § 1391(b)(2).

10 **IV. PARTIES**

11 8. Plaintiff Danielle Soule is a resident of the County of Los Angeles.

12 9. Defendant Los Angeles County is a public entity, duly organized and
13 existing under the laws of the State of California. The LAPD is the law enforcement
14 agency for the Defendant Los Angeles County. Thus, Defendant Los Angeles County is
15 and was at all relevant times responsible for the actions and/or inactions and the
16 policies, procedures, customs and practices of the LAPD and its respective employees
17 and/or agents.

18 10. Defendant LAPD Police Chief Jim McDonnell was and is the Chief of
19 Police of the LAPD at the time of the incident. As Police Chief, Defendant McDonnell
20 was and is the policymaker for the LAPD. Defendant McDonnell was and is responsible
21 for promulgating policies and procedures and allowing customs/practices pursuant to
22 which the acts of Defendant Officers Copeland, Rodriguez, and Doe Defendants alleged
23 herein were committed. Defendant McDonnell is sued under his individual and official
24 capacities.

25 11. Defendant Officer Gary Copeland (#30877) is an officer with the LAPD
26 whose acts and failures to act caused or contributed to injury to Plaintiff Soule.

27 12. Defendant Officer Ruben Rodriguez (#38654) is an officer with the LAPD
28 whose acts and failures to act caused or contributed to Plaintiff Soule's injury.

1 13. The true names of Doe Defendants 1 through 10, inclusive, are presently
2 unknown to Plaintiff, who therefore sue each of these Defendants by such fictitious
3 names. Upon ascertaining the true identities of the Doe Defendants, Plaintiff will amend
4 this Complaint for Damages, or seek leave to do so, by inserting the true names in lieu
5 of the fictitious names.

6 14. Plaintiff Soule is informed and believes, and on the basis of such
7 information and belief, alleges that Defendants Copeland and Rodriguez, and each Doe
8 Defendant are in some manner legally responsible for the acts, omissions, injuries and
9 damages herein alleged.

10 15. Plaintiff is informed and believes, and thereon alleges, that at all times
11 relevant herein, Defendants were the agents, employees, servants, joint venturers,
12 partners, and/or co-conspirators of the other Defendants named in this Complaint and
13 that at all times, each of the Defendants was acting within the course and scope of said
14 relationship with Defendants.

15 16. Plaintiff is informed and believes, and thereupon alleges that, at all times
16 material herein, each of the Defendants was the agent or employee of, and/or working
17 in concert with, his/her co-Defendants and was acting within the course and scope of
18 such agency, employment, and/or concerted activity. Plaintiff alleges that to the extent
19 certain acts and omissions were perpetrated by certain Defendants, the remaining
20 Defendant or Defendants confirmed and ratified said acts and omissions.

21 17. Whenever and wherever reference is made in this Complaint for Damages
22 to any act or failure to act by a Defendant or Defendants, such allegations and
23 references shall also be deemed to mean the acts and failures to act of each Defendant
24 acting individually, jointly, and severally.

25 **V. PRE-LAWSUIT PROCEDURES FOR STATE LAW CLAIMS**

26 18. Plaintiff has exhausted her administrative remedies by filing governmental
27 tort claims.

28 19. On December 3, 2025, pursuant to Government Code § 910, Plaintiff

1 Soule filed her Tort Claim for Damages with the Los Angeles City Clerk.

2 20. The County of Los Angeles failed to respond to the claims within forty-
3 five days. Government Code § 911.6.

4 **VI. HISTORY OF USING HORSES AS POLICE WEAPONS**

5 21. The LAPD has a long history of using horses as intimidating and
6 unpredictable police weapons, which has been condemned for years. Particularly when
7 the LAPD uses its horses for crowd control.

8 22. The LAPD has reportedly used its horses to clear crowds, trapping between
9 horses.¹

10 23. In 2025, at least seven officers from the LAPD’s Mounted Unit were
11 filmed on horseback trampling a protester with their horses and shoving down an
12 elderly protester.² In fact, the LAPD deployed dozens of officers on horseback for
13 crowd control numerous times in 2025.³

14 24. The LAPD and the City of Los Angeles have been made well aware of the
15 problem with using their horses for crowd control. The National Lawyers Guild and
16 Community Action Networks sent a letter to both L.A. Mayor Karen Bass and Police
17 Chief Jim McDonnell in June 2025 criticizing the LAPD officers’ handling of protests

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21 ¹ Kevin Rector and James Queally, “LAPD’s use of horses to clear crowd condemned
22 by activists, civil rights leaders,” L.A. Times, Jan. 22, 2021.

23 ² Andrew Sartain, “Trampling dissent: How police horses have been used to crush
24 protest from Selma to LA,” The Black Wall Street Times, June 16, 2025.

25 ³ CBS News, “LAPD uses horses to disperse protesters from downtown Los Angeles,”
26 June 14, 2025, available at <https://tinyurl.com/bdfd9ebm>; iTV News, “Police on
27 horseback ‘trample’ protesters in Los Angeles moments before downtown curfew,”
28 June 12, 2025, available at <https://tinyurl.com/hsvv8w64>; LATaco, Instagram Video,
June 24, 2025, available at <https://tinyurl.com/2j9wz4sj>; Vitus Larrieu, “LAPD on
horseback: Critics denounce LAPD’s use of horses at protests,” LAist, June 19, 2025;
iHeartRadio, “LAPD’S Horseback Tactics at Protests Face Scrutiny,” KFI AM 640,
June 19, 2025; Know Your Rights Camp, “LAPD Officers On Horseback Draw
Complaints Abuse Use of Force During Protest,” July 2, 2025.

1 particularly by using their horses.⁴ Facing widespread media coverage and criticism, the
2 LAPD Police Chief Jim McDonnell responded to the inquiries and stated the
3 investigation into the June 2025 horse trampling incident of a protester caught on film
4 was underway.⁵

5 VII. STATEMENT OF FACTS

6 25. Plaintiff Danielle Soule is a forty-year-old woman of Japanese and
7 Caucasian descent. She is an advocate for immigrants' rights. Ms. Soule holds a
8 bachelor's degree. At the time of this incident, Plaintiff Soule worked as a part-time
9 Door Dash delivery drive. Prior to this incident, worked for nine years as a general
10 manager for an electrical contracting company.

11 26. On October 18, 2025, Plaintiff Soule attended the "No Kings" Protest in
12 downtown Los Angeles with other people to document police activity. The event
13 protested in part the federal government's escalated attacks, via Immigration and
14 Customs Enforcement ("ICE") agents and LAPD complicity, on brown and Black
15 immigrant communities, kidnapping people with no suspicion solely based on the color
16 of their skin.

17 27. Plaintiff Soule monitored the protests and police activity with her iPhone
18 camera, quietly and peacefully filming police interactions with protesters.

19 28. Plaintiff Soule arrived downtown around 2:00 p.m. at the downtown ICE
20 detention center.

21 29. Plaintiff Soule eventually made her way to the "No Kings" Protest
22 happening nearby where people were mostly dancing and engaging in a parade-like
23 atmosphere.

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25 ⁴ Vitus Larrieu, "LAPD on horseback: Critics denounce LAPD's use of horses at
26 protests," LAist, June 19, 2025; Know Your Rights Camp, "LAPD Officers On
27 Horseback Draw Complaints Abuse Use of Force During Protest," July 2, 2025.

28 ⁵ Vitus Larrieu, "LAPD on horseback: Critics denounce LAPD's use of horses at
protests," LAist, June 19, 2025; Know Your Rights Camp, "LAPD Officers On
Horseback Draw Complaints Abuse Use of Force During Protest," July 2, 2025.

1 30. Shortly before 7:30 p.m., Plaintiff Soule heard a police helicopter overhead
2 make some type of announcement, but she could not understand what was said.

3 31. Around this time, LAPD officers arrived shooting less lethal weapons at
4 protesters, and then more LAPD Officers arrived on mounted horseback.

5 32. Plaintiff Soule heard no police warning or announcement before police
6 arrived on horseback.

7 33. The horses stood towering over the crowd with officers mounted on top.

8 34. The police horses weigh over 1,000 pounds and stand over 72 inches high.

9 35. The officers atop the horses were armed with police-issued batons and
10 dressed in what appeared to be riot gear.

11 36. Officers on horseback began pushing their horses into the crowd,
12 eventually splitting the crowd and pushing part of the crowd down Commercial
13 Avenue.

14 37. Officers began turning their horses in circles so that the horse's large
15 bodies and strong legs pushed into the crowd of protesters, pushing them further down
16 the street.

17 38. Plaintiff Soule was terrified by the horses. As they are animals, particularly
18 prey animals, the horses felt unpredictable in their movements.

19 39. Plaintiff Soule complied with what seemed to be officer intentions to
20 disperse the crowd by walking backwards down Commercial Avenue, facing the
21 officers on horseback while filming on her phone and using a flashlight to see.

22 40. LAPD Officers pushed their horses right up to Plaintiff Soule, using the
23 horses' large bodies to terrify Plaintiff Soule and the crowd and push her and the crowd
24 down Commercial Ave.

25 41. Plaintiff Soule was not shouting or protesting, but documenting police
26 activity.

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1 42. As Plaintiff Soule was walking down Commercial Avenue, with no
2 warning and while Plaintiff Soule was still dispersing, Officer Gary Copeland (#30877)
3 raised his police issued baton and while on horseback in a position much higher than
4 Plaintiff Soule, brought the baton down with full force on her head. Plaintiff Soule
5 immediately recoiled, disoriented and in pain, and grabbed her head, feeling the pain
6 and blood from the blow.



24 43. Officer Copeland raised his baton again in the same manner and attempted
25 to bludgeon Plaintiff Soule again on her head, but Plaintiff Soule's friend protected her
26 by moving her out of the way.

27 44. Immediately after her friend shielded her from Officer Copeland's second
28 blow, another LAPD Officer Ruben Rodriguez (#38654) on mounted horseback riding

1 close to Officer Copeland raised his baton to bludgeon Plaintiff Soule again, but was
2 unable to do so as she was already backing away.
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1 45. Plaintiff Soule's friend immediately took her to the hospital. The Officer's
2 blow had created a large gash on her scalp, requiring six staples in her head to close the
3 gaping wound.
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1 46. Numerous other LAPD personnel were present during the events described
2 above, yet none of them intervened to prevent Officer Copeland from bludgeoning
3 Plaintiff Soule with his baton while on horseback.

4 47. As a result of being bludgeoned by Officer Copeland, Plaintiff Soule
5 suffered severe, prolonged physical pain, headaches, light sensitivity, neck and back
6 pain, dizziness to the point where she was essentially bedridden, disorientation, the
7 inability to lift heavy things, the inability to stand for more than a few minutes at a time,
8 and psychological trauma for weeks after the incident.

9 48. Plaintiff Soule has required subsequent medical attention since the incident
10 and has been diagnosed with post concussive syndrome and severe concussion.

11 49. In the weeks after the incident, Plaintiff Soule found herself suddenly
12 scared of nearly all animals, including her own dog, afraid they may lunge at her.
13 Plaintiff Soule never felt scared of her own dog before this incident.

14 50. In the weeks after the incident, Plaintiff Soule was unable to continue her
15 work as a delivery driver as she could barely stand, felt constantly dizzy, and was in
16 excruciating pain.

17 51. To this day, Plaintiff Soule still suffers from debilitating headaches, neck
18 and back pain, dizziness, disorientation, and psychological trauma.

19 **FIRST CAUSE OF ACTION**

20 **42 U.S.C. § 1983 Fourth Amendment Excessive Force**

21 ***Against County of Los Angeles via Monell Liability, Defendant McDonnell, and All***
22 ***Individual Defendant Officers***

23 52. Plaintiff realleges and incorporates by reference each and every allegation
24 contained above as though fully set herein.

25 53. Upon information and belief, at all times herein mentioned, Defendants
26 County of Los Angeles and Defendant McDonnell acted with deliberate indifference,
27 and conscious and reckless disregard for Plaintiff's safety, security and constitutional
28 and statutory rights, including the right to be free from unreasonable seizures and

1 excessive force under the Fourth and Fourteenth Amendments, and the right to
2 procedural and substantive due process. Defendants maintained, enforced, tolerated,
3 ratified, permitted, acquiesced in, and/or applied the policies, practices, procedures and
4 customs described above. At all times relevant herein, Defendant McDonnell had final
5 policy-making authority and promulgated and maintained constitutionally deficient
6 policies, practices, procedures and customs.

7 54. Individual Defendant Officers, acting under color of law, deprived Plaintiff
8 of rights, privileges and immunities secured by the Constitution and laws of the United
9 States, including those secured by the Fourth Amendment to the Constitution,
10 incorporated and made applicable to the states by the Fourteenth Amendment, by
11 subjecting her to unreasonable and excessive force, including potentially lethal force.
12 Officer Copeland unreasonably bludgeoned Plaintiff Soule on top of her head with full
13 force, from the vantage point of sitting much higher than her while on mounted
14 horseback. This resulted in her diagnosis of post concussive syndrome and severe
15 concussion.

16 55. The foregoing wrongful acts and Defendants' failures to act severely
17 injured, traumatized and could have killed Plaintiff Soule. As a proximate result of the
18 foregoing wrongful acts, Plaintiff Soule suffered post concussive syndrome and severe
19 concussion, resulting in severe, prolonged physical pain, headaches, light sensitivity,
20 neck and back pain, dizziness to the point where she was essentially bedridden,
21 disorientation, unable to lift heavy things, unable to stand for more than a few minutes
22 at a time, and psychological trauma for weeks after the incident.

23 56. By engaging in the foregoing wrongful acts and failures to act, Defendants
24 acted with conscious disregard for Plaintiff's rights. There was no need for Defendant
25 Officer Copeland to bludgeon Plaintiff Soule with full force on top of her head. Plaintiff
26 Soule was already dispersing and quietly walking in the direction the LAPD Officers
27 and their horses pushed her towards. Plaintiff Soule posed no threat to the officers and
28 was not behaving erratically or disorderedly.

1 57. Defendants' conduct was willful, wanton, malicious and oppressive,
2 thereby justifying an award of punitive damages against the Individual Defendants in an
3 amount adequate to punish the wrongful conduct alleged herein and to deter such
4 conduct in the future.

5 **SECOND CAUSE OF ACTION**

6 **42 U.S.C. § 1983 Fourth Amendment Failure to Intervene**

7 ***Against County of Los Angeles via Monell Liability, Defendant McDonnell, and All***
8 ***Individual Defendant Officers***

9 58. Plaintiff realleges and incorporates by reference each and every allegation
10 contained above as though fully set herein.

11 59. Upon information and belief, at all times herein mentioned, Defendants
12 County of Los Angeles and Defendant McDonnell acted with deliberate indifference,
13 and conscious and reckless disregard for Plaintiff's safety, security and constitutional
14 and statutory rights, including the right to be free from unreasonable seizures and
15 excessive force under the Fourth and Fourteenth Amendments and for fellow Officers
16 to intervene to prevent such excessive force, and the right to procedural and substantive
17 due process. Defendants maintained, enforced, tolerated, ratified, permitted, acquiesced
18 in, and/or applied the policies, practices, procedures and customs described above. At
19 all times relevant herein, Defendant McDonnell had final policy-making authority and
20 promulgated and maintained constitutionally deficient policies, practices, procedures
21 and customs.

22 60. Individual Defendant Officers, acting under color of law, deprived Plaintiff
23 of rights, privileges and immunities secured by the Constitution and laws of the United
24 States, including those secured by the Fourth Amendment to the Constitution,
25 incorporated and made applicable to the states by the Fourteenth Amendment, by
26 subjecting her to unreasonable and excessive force, including potentially lethal force.
27 Officer Copeland unreasonably bludgeoned Plaintiff Soule right on top of her head with
28 full force, from the vantage point of sitting much higher than her while on mounted

1 horseback. This resulted in her diagnosis of post concussive syndrome and severe
2 concussion.

3 61. Upon information and belief, at all relevant times herein mentioned,
4 Defendant Officer Rodriguez and Doe Defendants were present and had a realistic and
5 reasonable opportunity to intervene to prevent Officer Copeland's use of excessive
6 force against Plaintiff Soule but neglected to do so.

7 62. By engaging in the foregoing wrongful acts and failures to act, Defendants
8 acted with conscious disregard for Plaintiff's rights. There was no need for Defendant
9 Officer Copeland to bludgeon Plaintiff Soule with full force right on top of her head.
10 Plaintiff Soule was already dispersing and quietly walking in the direction the LAPD
11 and their horses pushed her towards. Plaintiff Soule posed no threat to the officers and
12 was not behaving erratically or disorderedly.

13 63. Defendants' conduct was willful, wanton, malicious and oppressive,
14 thereby justifying an award of punitive damages against the individual Defendants in an
15 amount adequate to punish the wrongful conduct alleged herein and to deter such
16 conduct in the future.

17 **THIRD CAUSE OF ACTION**

18 **42 U.S.C. § 1983 First Amendment Retaliation**

19 ***Against County of Los Angeles via Monell Liability, Defendant McDonnell, and All***
20 ***Individual Defendant Officers***

21 64. Plaintiff realleges and incorporates by reference each and every allegation
22 contained above as though fully set herein.

23 65. Upon information and belief, at all times herein mentioned Defendants
24 County of Los Angeles and Defendant McDonnell acted with deliberate indifference,
25 and conscious and reckless disregard for Plaintiff's safety, security and constitutional
26 and statutory rights, including the right to freedom of speech and assembly under the
27 First Amendment, and the right to procedural and substantive due process. Defendants
28 maintained, enforced, tolerated, ratified, permitted, acquiesced in, and/or applied the

1 policies, practices, procedures and customs described above. At all times relevant
2 herein, Defendant McDonnell had final policy-making authority and promulgated and
3 maintained constitutionally deficient policies, practices, procedures and customs.

4 66. Individual Defendant Officers, acting under color of law, deprived Plaintiff
5 of rights, privileges and immunities secured by the Constitution and laws of the United
6 States, including those secured by the First Amendment to the Constitution,
7 incorporated and made applicable to the states by the Fourteenth Amendment, by
8 retaliating against her for exercising her First Amendment right to freedom of speech,
9 expression and assembly.

10 67. Plaintiff Soule engaged in protected expression and assembly by attending
11 the No Kings Protest, protesting ICE and LAPD actions, and calmly filming police
12 activity. Plaintiff Soule's attendance at the protest against ICE and LAPD actions and
13 filming the LAPD on mounted horseback angered the Defendant Officers and motivated
14 them to retaliate against Plaintiff Soule by forcefully striking her on top of her head.

15 68. Plaintiff Soule's protected expression, assembly and conduct was a
16 substantial or motivating factor in the Defendant Officers' decision to retaliate against
17 her. This was demonstrated by the fact that Officer Copeland bludgeoned Plaintiff
18 Soule for no reason while she was peacefully and quietly filming them while walking
19 down Commercial Ave.

20 69. The foregoing wrongful acts and failures to act by Defendants injured and
21 nearly killed Plaintiff Soule. As a proximate result of the foregoing wrongful acts by
22 Defendants, Plaintiff Soule sustained general damages, including pain and suffering,
23 and fear of police, animals and attending future protests, in an amount in accordance
24 with proof.

25 70. By engaging in the foregoing and wrongful acts and failures to act,
26 Defendants acted with conscious disregard for Plaintiff Soule's rights. There was no
27 need for Defendant Officer Copeland to bludgeon Plaintiff Soule with full force right on
28 top of her head. Plaintiff Soule was already dispersing and quietly walking in the

1 direction the LAPD and their horses pushed her towards. Plaintiff Soule posed no threat
2 to the officers and was not behaving erratically or disorderedly.

3 71. Defendants' conduct was willful, wanton, malicious, and oppressive,
4 thereby justifying an award of punitive damages against the individual Defendants in an
5 amount adequate to punish the wrongful conduct alleged herein and to deter such
6 conduct in the future.

7 **FOURTH CAUSE OF ACTION**

8 **Bane Act Cal. Civ. Code § 52.1**

9 ***Against All Individual Defendant Officers***

10 72. Plaintiff realleges and incorporates by reference each and every allegation
11 contained above as though fully set forth herein.

12 73. The California Constitution Art. I. § 13 and the Fourth Amendment United
13 States Constitution guarantee the right of persons to be free from unnecessary and
14 excessive force by law enforcement officers. Defendants, by engaging in the wrongful
15 acts and failures to act alleged in this action, denied Plaintiff this right by force, threats,
16 intimidation, or coercion, either intentionally or through deliberate indifference.
17 Defendant Officers' unlawful actions were a substantial factor causing Plaintiff's
18 injuries. For this reason, Plaintiff may state a claim for damages pursuant to Civil Code.
19 § 52.1.

20 74. The California Constitution Art. I. § 2 and the First Amendment to the
21 United States Constitution guarantee the right of persons to engage in protected speech
22 and assembly. Defendants, by engaging in the wrongful acts and failures to act alleged
23 herein, denied this right to Plaintiff through their deliberate indifference, thus giving
24 Plaintiff a claim for damages pursuant to Cal. Civ. Code. § 52.1. Defendant Officers
25 retaliated against Plaintiff for exercising her constitutional right to engage in protected
26 speech and assembly. The Defendant Officers' unlawful actions were a substantial
27 factor causing Plaintiff's injuries.

28 75. As the direct and legal result of Defendants' conduct, Plaintiff suffered and

1 will continue to suffer damages, including but not limited to those set forth above.
2 Plaintiff is entitled to statutory damages under Civil Code § 52.1, as well as
3 compensatory and punitive damages and attorneys' fees.

4 **FIFTH CAUSE OF ACTION**

5 **Assault**

6 ***Against All Individual Defendant Officers***

7 76. Plaintiff realleges and incorporates by reference each and every allegation
8 contained above as though fully set forth herein.

9 77. Defendant Officers Copeland and Rodriguez acted, intending to cause
10 harmful or offensive contact with Plaintiff Soule, threatened to touch Plaintiff Soule in
11 a harmful or offensive manner, and did touch her in an offensive manner.

12 78. Plaintiff Soule reasonably believed that she was about to be touched in a
13 harmful or offensive manner, and it reasonably appeared to Plaintiff Soule that
14 Defendant Officers were about to carry out their threats.

15 79. Defendants had no reason to use force on Plaintiff Soule, who was not
16 breaking any laws, not violating any police orders, and was calmly filming police as she
17 walked in the direction Officers and their horses pushed her towards.

18 80. Plaintiff Soule did not consent to Defendants' conduct.

19 81. Plaintiff Soule was injured and harmed.

20 82. Defendants' conduct was a substantial factor in causing Plaintiff Soule's
21 harm.

22 83. The County of Los Angeles is vicariously liable for the Defendant
23 Officers' actions.

24 84. Defendant Officers Copeland and Rodriguez's conduct was willful,
25 wanton, malicious, and oppressive, thereby justifying an award of punitive damages
26 against the individual Defendants in an amount adequate to punish the wrongful
27 conduct alleged herein and to deter such conduct in the future.

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1 **SIXTH CAUSE OF ACTION**

2 **Battery**

3 ***Against All Individual Defendant Officers***

4 85. Plaintiff realleges and incorporates by reference each and every allegation
5 contained above as though fully set forth herein.

6 86. Defendant Officer Copeland intentionally touched Plaintiff Soule or caused
7 her to be touched.

8 87. Defendant Officer Copeland used unreasonable and excessive force.
9 Defendants had no reason to use force on Plaintiff Soule, who was not breaking any
10 laws, not violating any police orders, and was calmly filming police as she walked
11 down the street.

12 88. Plaintiff Soule did not consent to the use of that force.

13 89. Plaintiff Soule was injured and harmed.

14 90. Defendants' use of unreasonable force was a substantial factor causing
15 Plaintiff Soule's harm.

16 91. The County of Los Angeles is vicariously liable for the Defendant
17 Officers' actions.

18 92. Defendant Officers Copeland and Rodriguez's conduct was willful,
19 wanton, malicious and oppressive, and thereby justifying an award of punitive damages
20 against the individual Defendants in an amount adequate to punish the wrongful
21 conduct alleged herein and to deter such conduct in the future.

22 **SEVENTH CAUSE OF ACTION**

23 **Negligence**

24 ***Against All Individual Defendant Officers***

25 93. Plaintiff realleges and incorporates by reference each and every allegation
26 contained above as though fully set forth herein.

27 94. Defendant Officers' actions and omissions resulting in Plaintiff's injuries
28 were the result of their negligent failure to abide by the standard of care imposed upon

1 law enforcement departments who regularly interact with the public. Instead of simply
2 allowing Plaintiff Soule to continue dispersing, Defendant Officers chose instead to use
3 excessive force in contravention of the established practices and established standards
4 of care.

5 95. As a direct result of Defendants' conduct, including excessive force upon
6 Plaintiff Soule, Plaintiff was injured.

7 96. The acts and failures to act as alleged herein caused severe pain, anxiety,
8 suffering and emotional distress and injury to Plaintiff. Plaintiff is therefore entitled to
9 damages in an amount to be proven at trial.

10 **EIGHTH CAUSE OF ACTION**

11 **Intentional Infliction of Emotional Distress**

12 ***Against All Individual Defendant Officers***

13 97. Plaintiff realleges and incorporates by reference each and every allegation
14 contained above as though fully set forth herein.

15 98. Defendant Officers saw Plaintiff Soule calmly and peacefully dispersing in
16 the direction Officers and their horses pushed her, and yet for no reason forcefully
17 bludgeoned her with their batons right on top of her head. After already striking her so
18 hard on her head that she began bleeding and stumbled in disorientation from the blow,
19 Defendant Officers Copeland and Rodriguez attempted to bludgeon Plaintiff Soule
20 again on top of her head. Defendants' conduct was plainly outrageous.

21 99. Defendant Officers bludgeoned Plaintiff Soule with reckless disregard to
22 the emotional distress that she would experience and with intent that Plaintiff Soule
23 would suffer emotional distress from the beating.

24 100. Since the incident, Plaintiff Soule has suffered severe mental anguish and
25 trauma. Encountering police mounted on large horses, she developed a sudden fear of
26 all animals, including her own dog. She suffered depression, anxiety, fear upon seeing
27 police, and fear of attending another demonstration.

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