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17 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
18 **FOR THE COUNTY OF LOS ANGELES**

19 JASON REEDY, RICCI SERGIENKO, and
20 SHAKEER RAHMAN,

21 Plaintiffs,

22 v.

23 CITY OF LOS ANGELES, RICK J. LINTON,
24 ALAN S. HAMILTON, and DOES 1-100,

25 Defendants.

Case No. **26STCV10973**

COMPLAINT FOR DAMAGES

1. Violation of the Tom Bane Civil Rights Act (Cal. Civil Code § 52.1)
2. Violation of the Ralph Civil Rights Act of 1976 (Cal. Civil Code § 51.7)
3. Assault (e.g., Cal. Civil Code § 43)
4. Battery (e.g., Cal. Civil Code § 43)
5. Negligence

DEMAND FOR JURY TRIAL

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1 **INTRODUCTION**

2 1. On the night of June 9, 2025, Los Angeles Police Department (“LAPD”) Officer Rick J.
3 Linton shot Plaintiffs Jason Reedy, Ricci Sergienko, and Shakeer Rahman with 40-millimeter projectile
4 rounds as they exercised their First Amendment rights. Mr. Reedy, a civil rights activist, and Mr.
5 Sergienko and Mr. Rahman, civil rights attorneys, were attending a public demonstration where they
6 observed Defendant Linton point his 40-millimeter weapon at a crowd of people. The Plaintiffs began
7 to record him. Linton responded by aiming his weapon at Mr. Reedy and shooting Mr. Reedy in the
8 groin area followed by aiming at Mr. Sergienko and shooting him in the stomach. Mr. Rahman then
9 asked Linton to state his name and badge number. Linton responded by threatening to “pop you right
10 now because you’re taking up my focus,” adding that it was “gonna hurt.” Linton then shot Mr.
11 Rahman in the groin area. Mr. Rahman continued to ask Linton to identify himself. Linton shot Mr.
12 Rahman in the groin a second time. This entire time Linton was standing behind a wall on a raised
13 platform several feet above the Plaintiffs, who each their hands raised as Linton shot them.

14 2. This LAPD’s use of 40-millimeter weapons have caused life-altering injuries to
15 protesters for years.¹ Linton was armed with this weapon even though his regular assignment was an
16 administrative position in the LAPD’s Office of Support Services. Other LAPD officers standing near
17 Linton had numerous opportunities to intervene or stop him but never did so. The highest ranking
18 supervisor among those officers was Defendant Alan Hamilton, an LAPD deputy chief. Hamilton heard
19 Linton repeatedly threaten Mr. Rahman and witnessed Linton shooting his weapon without justification
20 yet did nothing to stop Linton’s several-minute shooting spree.

21 3. This lawsuit seeks compensatory, statutory, and punitive damages for Defendants’
22 egregious misconduct, which caused Plaintiffs severe, prolonged physical pain and psychological
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24 ¹ See, e.g., Devon Lum et al., *How Los Angeles Police Officers Broke Protocols and Injured*
25 *Protesters*, N.Y. Times, July 3, 2025, <https://www.nytimes.com/video/world/americas/100000010259036/los-angeles-protests-lapd-violence.html>;
26 Kevin Rector, *Protester gets \$1.5-million settlement over testicle injury caused by LAPD projectile*, L.A. Times, May 17, 2024 <https://www.latimes.com/california/story/2024-05-17/protester-injured-by-lapd-projectile-2020-settlement>;
27 Tony Webster, *Minneapolis settles lawsuit with Linda Tirado, journalist blinded in one eye during May 2020 unrest*, Minnesota Reformer, May
28 26, 2022, <https://minnesotareformer.com/2022/05/26/minneapolis-settles-lawsuit-with-linda-tirado-journalist-blinded-in-one-eye-during-may-2020-unrest/>.

1 trauma.

2 **PARTIES**

3 4. Plaintiff Jason Reedy is and was at all times relevant hereto a resident of the County of
4 Los Angeles.

5 5. Plaintiff Ricci Sergienko is and was at all times relevant hereto a resident of the County
6 of Los Angeles.

7 6. Plaintiff Shakeer Rahman is and was at all times relevant hereto a resident of the County
8 of Los Angeles.

9 7. Defendant City of Los Angeles is a municipal corporation under the Constitution and
10 laws of the State of California. The Los Angeles Police Department is a local government entity and an
11 agency of the City.

12 8. Defendant Rick J. Linton (#38456) is or was at all relevant times a police officer
13 employed by the LAPD.

14 9. Defendant Alan S. Hamilton (#27393) is or was at all relevant times a Deputy Chief
15 employed by the LAPD and the Commanding Officer of the LAPD's Detective Bureau.

16 10. Defendants Does 1-100 are or were at all relevant times law enforcement officers
17 employed by the LAPD.

18 11. On information and belief, Does 1 through 100 were the agents, servants, and employees
19 of Defendant City. Plaintiffs are ignorant of the true names and capacities of the Doe Defendants sued
20 herein as Does 1 through 100, inclusive, and therefore sue these Defendants by such fictitious names.
21 On information and belief, the Doe Defendants are responsible in some manner for the damages and
22 injuries hereinafter complained of. At all times herein, each of the Doe Defendants was acting under the
23 color of state law. On information and belief, there is audio and/or body-worn video and/or surveillance
24 video that may identify these officers. Plaintiffs will amend this Complaint to allege these officers' true
25 names and capacities when ascertained. The individual Doe Defendants are sued in both their
26 individual and official capacities.

27 12. In doing the acts and failing to act as hereinafter described, the individually named
28 Defendants and Does 1-100 were acting with the implied and actual permission and consent of the City

1 of Los Angeles.

2 13. On information and belief, at all times relevant hereto, Defendants, and each of them,
3 were the agents, servants and employees of the other Defendants and were acting at all times within the
4 scope of their agency and employment and with the knowledge and consent of their principal and
5 employer.

6 **JURISDICTION AND VENUE**

7 14. This Court has jurisdiction over Plaintiffs' claims pursuant to Article VI, section 10 of
8 the California Constitution and under Code of Civil Procedure §§ 187, 526(a), 1060, and 1085.

9 15. Venue is proper in this Court pursuant to Code of Civil Procedure §§ 393 and 395,
10 because the conduct complained of occurred in the County of Los Angeles and this action is against
11 public officers for acts done "in virtue of the[ir] office." Code Civ. Proc. § 393(b). The relief sought is
12 within this Court's power to grant.

13 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

14 16. Each Plaintiff exhausted his administrative remedies by timely filing a governmental tort
15 claim pursuant to California Government Code § 910 et seq. This action was timely filed.

16 **FACTUAL ALLEGATIONS**

17 **A. California and the Federal Courts Prohibit LAPD Officers From Using Highly**
18 **Dangerous 40-Millimeter Kinetic Energy Projectiles Absent Extraordinary**
19 **Circumstances.**

20 17. In the protests that followed the murder of George Floyd in 2020, police officers
21 repeatedly shot nonviolent demonstrators with the same 40-millimeter "less-lethal" kinetic energy
22 projectiles, commonly known as rubber bullets, that Defendant Linton shot Plaintiffs with. These
23 rounds travel slower than bullets but weigh five times as much. They have injured protestors by
24 breaking their skin and bones, blinding them, rupturing their organs, and maiming them.

25 18. Alarmed by these life-changing injuries and by the millions of dollars public entities
26 have had to pay to compensate shooting victims, California passed a law that prohibits police from
27 using 40-millimeter kinetic energy projectiles unless "the use is objectively reasonable to defend
28 against a threat to life or serious bodily injury." Cal. Penal Code § 13652(b).

1 19. On May 10, 2021, in response to LAPD’s rampant use of 40-mm rounds during the 2020
2 protests, the United States District Court for the Central District of California issued a preliminary
3 injunction strictly limiting when and how LAPD officers may fire these 40-mm kinetic energy
4 projectiles at public demonstrations. *See Black Lives Matter Los Angeles, et al. v. City of Los Angeles,*
5 *et al.*, No. CV 20-5027 CBM, ECF No. 102 (C.D. Cal. May 10, 2021).

6 20. Under the terms of this preliminary injunction, “[a]n officer may use 40mm less-lethal
7 munitions only when the officer reasonably believes that a suspect is violently resisting arrest or poses
8 an immediate threat of violence or physical harm”; “[t]he use of 40mm less-lethal munitions should be
9 preceded by a warning”; and “[t]he 40mm launcher must not be used to target the head, neck, face,
10 eyes, kidneys, chest, groin or spine of a person.” *Id.* at 1:23–26, 2:9–10.

11 **B. LAPD Responds to Protests Against ICE Raids with Unprecedented Violence.**

12 21. Starting in early June 2025, ICE and other federal agencies have conducted aggressive,
13 violent, and largely unlawful immigration raids in the County of Los Angeles and throughout the
14 country. Masked federal agents armed with military weaponry have flooded businesses, street corners,
15 bus stops, day-laborer centers, agricultural sites, and numerous other locations to seize Angelenos,
16 often based solely on their skin color, language, location, or job. Agents seldom present valid warrants
17 or have visible badges identifying themselves as law enforcement, and they routinely brutalize the
18 people they target. These raids have terrorized Los Angeles, causing many Angelenos to live and work
19 in fear on a daily basis.

20 22. As soon as these ICE raids began, thousands of people took to the streets to protest. All
21 over Los Angeles County, demonstrators marched through the streets, waved flags, carried signs, and
22 chanted. At many of these demonstrations, children carried flags and signs, bands played, people
23 danced, and people gave speeches.

24 23. LAPD responded with extreme violence and aggression. LAPD officers shot protesters
25 with 40-mm rounds, frequently in the head and groin. Officers deployed flash bang grenades and tear
26 gas on peaceful crowds. They trampled protesters with horses and chased demonstrators out of public
27 spaces. Officers kettled and arrested protesters, often with no dispersal order or other warning.
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1 **C. The Central District Finds LAPD In Contempt For Violating the 2021 Injunction,**
2 **Citing Defendant Linton’s Actions Against Plaintiffs.**

3 24. As discussed above, the Central District’s 2021 injunction strictly limits when and how
4 LAPD officers may fire 40-millimeter projectiles at public demonstrations.

5 25. Yet even after the Central District issued this injunction, the LAPD’s use of
6 40-millimeter kinetic energy projectiles only escalated. Its use of these projectiles against peaceful anti-
7 ICE protesters was so egregious that the Central District found the City of Los Angeles in contempt for
8 violating the 2021 preliminary injunction. *Black Lives Matter Los Angeles, et al. v. City of Los Angeles,*
9 *et al.*, No. CV 20-5027 CBM, ECF No. 277, at 6 (C.D. Cal. Jan. 15, 2026).

10 26. The Central District not only held the City in contempt for violating its order, but also
11 prohibited LAPD officers from using 40-mm rounds for crowd control *at all*. *Id.* at 7–8.

12 27. In its contempt finding, the Central District noted that during the June 2025 protests,
13 LAPD “used 40mm munitions on protestors who did not pose an immediate threat of violence of
14 physical harm, did not provide warnings before using the munitions, and hit protestors in restricted
15 areas of the body,” including in the groin. *Id.* at 8.

16 28. The Central District cited Defendant Linton’s shooting of Plaintiffs as one of many
17 examples of this unlawful practice. *See id.* at 4. The Court stated: “LAPD officers shot Jason Reedy in
18 the groin with a 40mm KIP while he was on the sidewalk with his hands up in the air. . . . In response
19 to the shooting of Mr. Reedy, Shakeer Rahman, counsel of record [in this matter], asked the officer for
20 his name and serial number pursuant to Cal. Penal Code 830.10. . . . The officer then shot Mr. Rahman
21 twice in the groin for ‘taking [the officer’s] focus.’” *Id.*

22 29. The Court cited video footage of these shootings, among others, as “evidence that
23 Defendants used 40mm munitions on protesters who did not pose an immediate threat of violence or
24 physical harm . . . and hit protesters in restricted areas of the body.” *Id.* at 8.

25 **D. Defendant Linton Repeatedly Shoots Plaintiffs as they Peacefully Protest and Observe**
26 **Law Enforcement.**

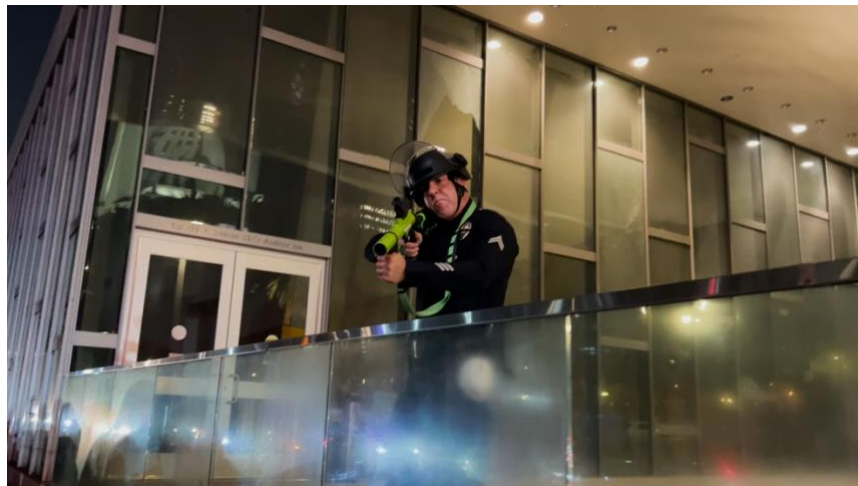
27 30. On the night of June 9, 2025, Plaintiffs attended a public demonstration in downtown
28 Los Angeles against ICE’s occupation of Los Angeles and the LAPD’s response to the recent protests.

1 Demonstrators marched through the streets, carrying signs and chanting. Plaintiffs attended the protest
2 to express their political beliefs and to observe law enforcement.

3 31. At approximately 9:30 p.m., Plaintiffs, alongside other demonstrators, marched
4 northbound on Main Street alongside the LAPD Headquarters building complex near the intersection of
5 First Street.

6 32. They approached a large, raised platform with a glass fence on the side of the complex.

7 33. Multiple LAPD officers, including Defendant Linton, were standing on the platform
8 behind the fence. Defendant Linton was armed with a 40-mm launcher.



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18 *Defendant Linton pointing his weapon at marchers.*

19 34. As the crowd walked by the raised platform, Defendant Linton began pointing his
20 weapon at demonstrators who were only feet away from him, below on the sidewalk.

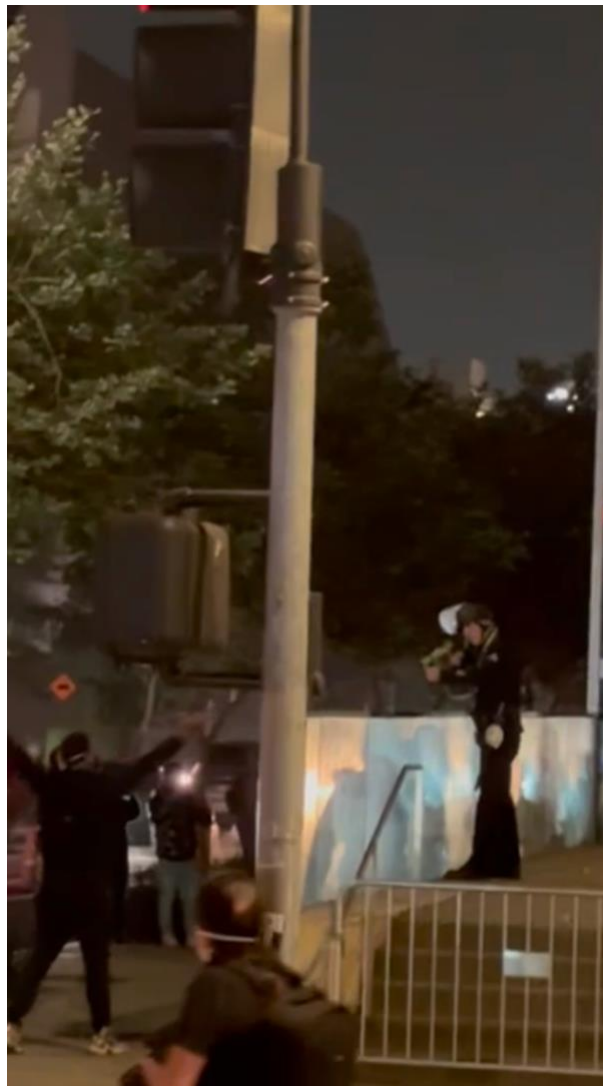
21 35. Seeing Defendant Linton standing on a raised platform aiming his weapon at the
22 protesters, Plaintiffs paused in front of the platform to observe Defendant Linton's conduct. Exercising
23 his First Amendment right to monitor police activity, Mr. Sergienko began to use his phone to film
24 Defendant Linton as he aimed his weapon at the protesters.

25 36. Defendant Linton continued to take aim at demonstrators, including Mr. Sergienko and
26 Mr. Reedy.

27 37. Multiple other Defendant Officers were standing near Defendant Linton as he repeatedly
28 pointed his weapon at the peaceful demonstrators, but they did nothing to intervene.

1 38. With no justification, Defendant Linton pointed his weapon at Mr. Reedy, who was
2 standing below Linton on the sidewalk. Defendant Linton shot Mr. Reedy with a 40-mm round in the
3 groin area. Mr. Reedy had both of his hands in the air when Linton shot him. Mr. Reedy immediately
4 bent over in pain, in what he describes as one of the most painful experiences of his life.

5 39. Mr. Reedy never engaged in violence, threatened to engage in violence, or engaged in
6 any other behavior that could have possibly justified Defendant Linton’s use of force against him.



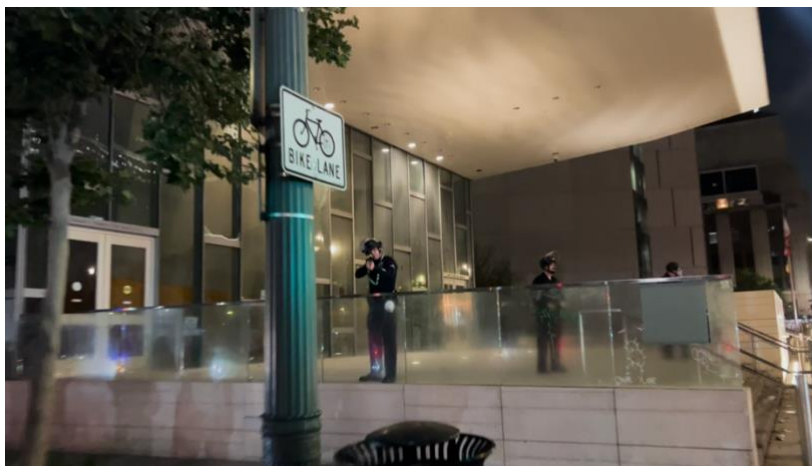
Defendant Linton shooting Mr. Reedy

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26 40. Defendant Linton reloaded his weapon as Mr. Sergienko began to back away from him.
27 Mr. Sergienko continued to film Linton. As Mr. Sergienko walked backwards, Linton pointed and
28 aimed his weapon at Mr. Sergienko. Defendant Linton then shot Mr. Sergienko in the stomach with a

1 40-mm round. The round ripped open Mr. Sergienko's skin and almost knocked him to the ground. Mr.
2 Sergienko was in severe pain.

3 41. Mr. Sergienko never engaged in violence, threatened to engage in violence, or engaged
4 in any other behavior that could have possibly justified Defendant Linton's use of force against him.

5 42. On information and belief, the other Defendant Officers, who were standing nearby
6 Defendant Linton, saw Defendant Linton shoot Mr. Reedy, then Mr. Sergienko, or otherwise were
7 aware that Defendant Linton shot Mr. Reedy, then Mr. Sergienko, but did nothing to intervene.



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15 *Defendant Linton shooting Mr. Sergienko as Mr. Sergienko*
16 *backed away.*

17 43. No other Defendant Officer intervened when Defendant Linton first pointed his weapon
18 at Mr. Reedy. No Defendant Officer intervened after Linton then shot Mr. Reedy. No Defendant
19 Officer intervened as Linton then reloaded his weapon and pointed it at Mr. Sergienko. No Defendant
20 Officer intervened when Linton shot Mr. Sergienko. No Defendant Officer intervened during any of
21 Linton's shootings despite having several reasonable opportunities to do so.

22 44. Mr. Rahman observed Defendant Linton shoot Mr. Reedy and Mr. Sergienko.

23 45. Mr. Rahman observed that Defendant Linton had no identifying information displayed
24 on his helmet, in contrast with other nearby officers whose helmets listed both a last name and serial
25 number in large letters.

26 46. After seeing Defendant Linton shoot Mr. Reedy and Mr. Sergienko, Mr. Rahman
27 repeatedly asked Defendant Linton to identify himself by his name or badge number. While doing so,
28 Mr. Rahman exercised his First Amendments rights and used his phone to film Defendant Linton.

1 47. Rather than identify himself, Defendant Linton yelled at Mr. Rahman, “I’m giving you a
2 warning.” As Mr. Rahman asked Linton what he was talking about, Linton threatened to shoot Mr.
3 Rahman with “this 40-millimeter,” adding that it was “gonna hurt.” Linton paced back and forth on the
4 platform above Mr. Rahman and continued to ignore Mr. Rahman’s requests to identify himself.

5 48. Defendant Hamilton, LAPD’s Chief of Detectives and one of the department’s highest-
6 ranking supervisors, was standing near Linton when this exchange occurred. Seconds after Defendant
7 Linton threatened Mr. Rahman, Defendant Hamilton touched Defendant Linton’s arm and spoke to
8 him.

9 49. Mr. Rahman continued to insist that Linton identify himself. Linton replied, “I’m gonna
10 pop you right now because you’re taking up my focus.” As he said this, Linton lifted his weapon,
11 aimed it directly at Mr. Rahman who was standing on the street below, and shot Mr. Rahman in the
12 groin area with a 40-mm round.

13 50. Mr. Rahman never engaged in violence, threatened to engage in violence, or engaged in
14 any other behavior that could have possibly justified Defendant Linton’s extreme use of force against
15 him.

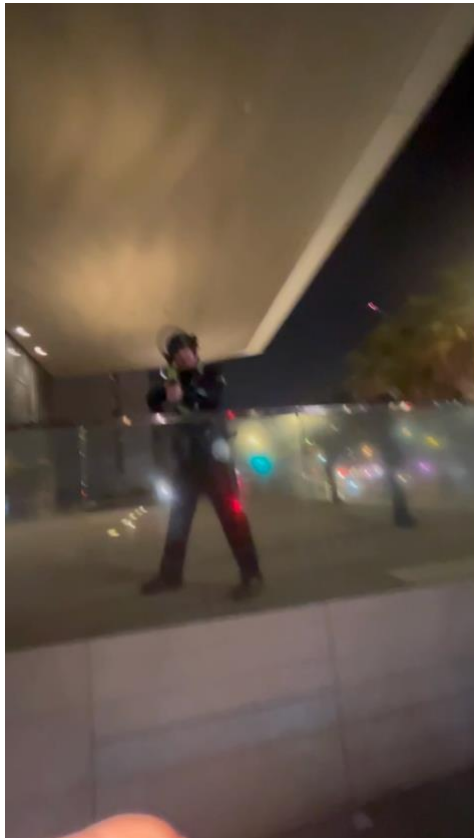
16 51. On information and belief, Defendant Hamilton and the other Defendant Officers heard
17 Defendant Linton threaten to shoot Mr. Rahman. Despite witnessing Linton shoot two other people
18 who simply stood, filmed and asked Linton to identify himself, the other Defendant Officers still did
19 not intervene when Linton fired a third time. This was despite having both notice and a reasonable
20 opportunity to intervene to prevent Defendant Linton from firing his weapon yet again.

21 52. After Defendant Linton shot Mr. Rahman, Mr. Rahman continued to ask Defendant
22 Linton to provide his identifying information while recording him.

23 53. Defendant Linton threatened, “I’m gonna hit you with this 40 again.”
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1 54. Mr. Rahman told the nearby Defendant Hamilton that Defendant Linton had shot Mr.
2 Rahman for asking Defendant Linton for his identifying information. Mr. Rahman asked Defendant
3 Hamilton for Defendant Linton’s identifying information. Defendant Hamilton ignored Mr. Rahman.
4 Instead, Defendant Hamilton approached Defendant Linton and spoke to him again.



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19 *Defendant Linton shooting Mr.
20 Rahman the second time.*

21 55. Mr. Rahman continued to ask Defendant Linton for his identifying information.

22 56. Defendant Linton threatened, “I’m telling you, I’m gonna hit you again.” Linton again
23 raised and pointed his weapon at Mr. Rahman. Mr. Rahman began to walk backwards, away from
24 Linton.

25 57. Defendant Linton then shot Mr. Rahman in the groin area a second time with a 40-mm
26 round.

27 58. Mr. Rahman never engaged in violence, threatened to engage in violence, or engaged in
28 any other behavior that could have possibly justified Defendant Linton’s extreme use of force against

1 him.

2 59. On information and belief, Defendant Hamilton and the other officers saw Defendant
3 Linton shoot Mr. Rahman or otherwise were aware that Defendant Linton shot Mr. Rahman the first
4 time. On information and belief, Defendant Hamilton and the other officers heard Defendant Linton
5 repeatedly threaten to shoot Mr. Rahman. This was after the officers witnessed Linton first shoot Mr.
6 Reedy, reload, then shoot Mr. Sergienko, and shoot Mr. Rahman the first time. Despite witnessing
7 Linton shoot three people three separate times who simply stood, filmed and asked Linton to identify
8 himself, the other officers still did not intervene when Linton fired a fourth time. This was despite the
9 fact that they had both notice and a reasonable opportunity to intervene to prevent Defendant Linton
10 from firing his weapon yet again.

11 60. As a result of being shot by Defendant Linton with 40-mm rounds, Plaintiffs suffered
12 severe, prolonged physical pain and psychological trauma. For example, Mr. Reedy was in significant
13 pain for weeks and was unable to engage in his hobby of running. He still feels pain at times today. Mr.
14 Sergienko was in pain and his mobility was severely restricted for several weeks. Mr. Rahman was in
15 increasingly intense pain for several days. Furthermore, as a result of being shot by Defendant Linton,
16 Plaintiffs did not attend numerous protests that they otherwise would have attended due to their
17 physical injuries and due to their fear of being subjected to force again by LAPD.

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Mr. Sergienko's injury.

FIRST CAUSE OF ACTION

Violation of the Tom Bane Civil Rights Act (Cal. Civil Code § 52.1)

(All Plaintiffs Against All Defendants)

61. Plaintiffs re-allege and incorporate by reference the preceding and subsequent paragraphs as though fully set forth herein.

62. California Civil Code § 52.1, known as the Tom Bane Civil Rights Act, prohibits any “person or persons, whether or not acting under the color of law,” from “interfer[ing] by threat, intimidation, or coercion” with the “exercise or enjoyment by any individual or individuals of rights secured by the Constitution or laws of the United States, or of the rights secured by the Constitution or laws of this state.” Cal. Civ. Code § 52.1(b).

63. The federal and state constitutions guarantee, inter alia, the right to peaceably assemble and to petition the government for a redress of grievances, the right to observe and film police officers, the right to be free from excessive force by police officers, and the right to due process.

64. By engaging in the wrongful acts and failures to act alleged above, Defendants interfered with Plaintiffs’ exercise of these and other constitutional rights, prevented Plaintiffs from continuing to engage in the exercise of such rights, and retaliated against Plaintiffs because of

1 Plaintiffs' exercise of such rights, in violation of California Civil Code § 52.1.

2 65. Defendants' actions as alleged in this complaint constituted interference by threat,
3 intimidation, or coercion with the exercise or enjoyment by any individual or individuals of rights
4 secured by the Constitution or laws of the United States, or of rights secured by the Constitution or
5 laws of California, in violation of California Civil Code § 52.1.

6 66. The conduct of the individual Defendants, including the Doe Defendants, who are public
7 employees of Defendant City of Los Angeles, was a substantial factor in causing the violations of rights
8 and attendant harms of Plaintiffs.

9 67. On information and belief, each individual Defendant, including the Doe Defendants,
10 was either personally involved in and/or aided and abetted the violations of Plaintiffs' constitutional
11 rights. Each individual Defendant, including the Doe Defendants, knew that the other individual
12 Defendants were committing unlawful actions against Plaintiffs and gave substantial assistance or
13 encouragement to the other individual Defendants.

14 68. As a direct and proximate result of the aforementioned acts or omissions of Defendants,
15 Plaintiffs sustained and incurred damages including but not limited to wounds, bruising, intense and
16 prolonged pain, suffering, fear, anxiety, nightmares, anger, frustration, humiliation, and other emotional
17 injuries.

18 69. As a direct and proximate result of the aforementioned acts or omissions of Defendants,
19 Plaintiffs sustained damages, including but not limited to those set forth above, statutory damages, and
20 treble statutory damages under California Civil Code § 52, to be determined at trial but of no less than
21 \$4,000, as well as compensatory and punitive damages and attorneys' fees.

22 70. Defendant City of Los Angeles is vicariously liable for the wrongful conduct of its
23 employees through the doctrine of respondeat superior.

24 71. The conduct of the individual Defendants, including the Doe Defendants, was willful,
25 wanton, malicious, oppressive, done with an evil motive or intent, and/or done with a reckless disregard
26 for the rights of Plaintiffs, and therefore warrants the imposition of exemplary and punitive damages
27 against each individual Defendant and Doe Defendant in an amount adequate to punish the wrongdoers
28 and deter future misconduct.

1 **SECOND CAUSE OF ACTION**

2 **Violation of the Ralph Civil Rights Act of 1976 (Cal. Civil Code § 51.7)**

3 **(All Plaintiffs Against All Defendants)**

4 72. Plaintiffs re-allege and incorporate by reference the preceding and subsequent
5 paragraphs as though fully set forth herein.

6 73. California Civil Code § 51.7, known as the Ralph Civil Rights Act of 1976, provides
7 that “[a]ll persons within the jurisdiction of this state have the right to be free from any violence, or
8 intimidation by threat of violence, committed against their persons or property because of political
9 affiliation, or on account of . . . characteristic[s]” such as their sex, race, color, religion, ancestry, or
10 national origin, or because they are perceived to have one or more of these characteristics. Cal. Civ.
11 Code. § 51.7(b)(1); *see also id.* § 51(b), (e).

12 74. Plaintiffs bring this cause of action against all Defendants by operation of state law.

13 75. By engaging in the wrongful acts and failures to act alleged above, Defendants
14 committed and threatened to commit violence against Plaintiffs because of Plaintiffs’ perceived
15 political affiliation and/or political beliefs and in retaliation for Plaintiffs exercising their First
16 Amendment rights.

17 76. There was no lawful justification for Defendants to commit violence against and
18 threaten violence against Plaintiffs because of Plaintiffs’ perceived political affiliation and/or political
19 beliefs while Plaintiffs were engaged in protected First Amendment activity.

20 77. The conduct of the individual Defendants, including the Doe Defendants, who are public
21 employees of Defendant City of Los Angeles, was a substantial factor in causing the violations of rights
22 and attendant harms of Plaintiffs.

23 78. On information and belief, each individual Defendant, including the Doe Defendants,
24 was either personally involved in and/or aided, abetted, incited, or conspired in the violations described
25 above. Each individual Defendant, including the Doe Defendants, knew that the other individual
26 Defendants were committing unlawful actions against Plaintiffs and gave substantial assistance or
27 encouragement to the other individual Defendants.

28 79. As a direct and proximate result of the aforementioned acts or omissions of Defendants,

1 Plaintiffs sustained and incurred damages including but not limited to wounds, bruising, intense and
2 prolonged pain, suffering, fear, anxiety, nightmares, anger, frustration, humiliation, and other emotional
3 injuries.

4 80. As a direct and proximate result of the aforementioned acts or omissions of Defendants,
5 Plaintiffs sustained damages, including but not limited to those set forth above, as well as
6 compensatory, statutory, and punitive damages, and attorneys' fees.

7 81. Defendant City of Los Angeles is vicariously liable for the wrongful conduct of its
8 employees through the doctrine of respondeat superior.

9 82. The conduct of the individual Defendants, including the Doe Defendants, was willful,
10 wanton, malicious, oppressive, done with an evil motive or intent, and/or done with a reckless disregard
11 for the rights of Plaintiffs, and therefore warrants the imposition of exemplary and punitive damages
12 against each individual Defendant and Doe Defendant in an amount adequate to punish the wrongdoers
13 and deter future misconduct.

14 **THIRD CAUSE OF ACTION**

15 **Assault (e.g., Cal. Civil Code § 43)**

16 **(All Plaintiffs Against All Defendants)**

17 83. Plaintiffs re-allege and incorporate by reference the preceding and subsequent
18 paragraphs as though fully set forth herein.

19 84. Under California law, every person has "the right of protection from bodily restraint or
20 harm." Cal. Civ. Code § 43.

21 85. Defendants threatened to touch Plaintiffs in a harmful or offensive manner.

22 86. Defendants intended to cause harmful or offensive contact with Plaintiffs.

23 87. Plaintiffs reasonably believed they were about to be touched in a harmful or offensive
24 manner.

25 88. It reasonably appeared to Plaintiffs that Defendants were about to carry out their threats.

26 89. Plaintiffs did not consent to Defendants' conduct.

27 90. Plaintiffs were harmed.

28 91. The conduct of the individual Defendants, including the Doe Defendants, who are public

1 employees of Defendant City of Los Angeles, was a substantial factor in causing the violations of rights
2 and attendant harms of Plaintiffs.

3 92. On information and belief, each individual Defendant, including the Doe Defendants,
4 was either personally involved in and/or aided and abetted the violations of Plaintiffs’ personal rights.
5 Each individual Defendant, including the Doe Defendants, knew that the other individual Defendants
6 were committing unlawful actions against Plaintiffs and gave substantial assistance or encouragement
7 to the other individual Defendants.

8 93. As a direct and proximate result of the aforementioned acts or omissions of Defendants,
9 Plaintiffs sustained and incurred damages including but not limited to wounds, bruising, intense and
10 prolonged pain, suffering, fear, anxiety, nightmares, anger, frustration, humiliation, and other emotional
11 injuries.

12 94. Defendant City of Los Angeles is vicariously liable for the wrongful conduct of its
13 employees through the doctrine of respondeat superior.

14 95. The conduct of the individual Defendants, including the Doe Defendants, was willful,
15 wanton, malicious, oppressive, done with an evil motive or intent, and/or done with a reckless disregard
16 for the rights of Plaintiffs, and therefore warrants the imposition of exemplary and punitive damages
17 against each individual Defendant and Doe Defendant in an amount adequate to punish the wrongdoers
18 and deter future misconduct.

19 **FOURTH CAUSE OF ACTION**

20 **Battery by a Police Officer (e.g., Cal. Civil Code § 43)**

21 **(All Plaintiffs Against All Defendants)**

22 96. Plaintiffs re-allege and incorporate by reference the preceding and subsequent
23 paragraphs as though fully set forth herein.

24 97. Defendants intentionally touched Plaintiffs or caused them to be touched.

25 98. Defendants used unreasonable force.

26 99. Plaintiffs did not consent to the use of that force.

27 100. Plaintiffs were harmed by Defendants’ conduct.

28 101. Defendants touched Plaintiffs without lawful justification.

1 Plaintiffs.

2 110. Defendants had no objectively reasonable basis to believe that Plaintiffs posed a threat
3 to life or a threat of serious bodily injury.

4 111. Defendants aimed 40-mm rounds at Plaintiffs' vital organs.

5 112. Defendant City of Los Angeles negligently failed to appropriately supervise, train,
6 review, and ensure that its officers abided by the standard of care and failed to enact appropriate
7 standards, procedures, and practices that would have prevented such harm to Plaintiffs.

8 113. Defendant City of Los Angeles is vicariously liable for the wrongful conduct of its
9 employees through the doctrine of respondeat superior.

10 114. As a direct and proximate result of the aforementioned acts or omissions, Plaintiffs
11 sustained and incurred damages including but not limited to wounds, bruising, intense and prolonged
12 pain, suffering, fear, anxiety, nightmares, anger, frustration, humiliation, and other emotional injuries.

13 **PRAYER FOR RELIEF**

14 115. Plaintiffs request entry of judgment in their favor against all Defendants as follows:

- 15 • General and compensatory damages for the above violations of constitutional,
16 statutory, and common-law rights, pain and suffering, all to be determined
17 according to proof;
- 18 • Punitive and exemplary damages against the individual Defendants in amounts
19 appropriate to punish Defendants and deter others from engaging in similar
20 misconduct;
- 21 • An award of attorneys' fees pursuant to California Civil Code §§ 52(b)(3) and
22 52.1(i), and California Code of Civil Procedure § 1021.5;
- 23 • Costs of suit;
- 24 • Pre- and post-judgment interest as permitted by law; and
- 25 • Such other and further relief as the Court may deem just and proper.

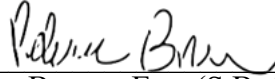
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JURY DEMAND

116. Plaintiffs demand a trial by jury on all issues so triable.

Dated: April 6, 2026

Respectfully submitted,



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