

Andrew M. Morrow, III, Esq. - State Bar No. 128300
Jordan Duncan-Smith, Esq., State Bar No. 354658
DOWNTOWN L.A. LAW GROUP

612 S. Broadway
Los Angeles, CA 90014
Tel: (213) 389-3765
Fax: (877) 389-2775
Email: Andy.morrow@downtownlalaw.com
jordan@downtownlalaw.com

Attorneys for Plaintiff
JOHN DOE C.S.

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

JOHN DOE C.S., an individual.

Plaintiff,

v.

LOS ANGELES COUNTY FIRE
DEPARTMENT, a public entity;
CALIFORNIA DEPARTMENT OF
CORRECTIONS AND REHABILITATION, a
public entity; and DOES 1 through 100,
inclusive.

Defendants.

Case No.: **25CHCV03232**

COMPLAINT FOR DAMAGES

(1) NEGLIGENCE
(2) BREACH OF MANDATORY
STATUTORY DUTIES
(3) INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS

COMES NOW, Plaintiff JOHN DOE C.S., ("Plaintiff") and hereby complains and
allege against Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public

1 entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a
2 public entity; and DOES 1 through 100, inclusive (“Defendants”), as follows:

3 **GENERAL ALLEGATIONS**

4 1. The claims set forth herein arise from adults who suffered acts of childhood sexual
5 assault at Holton Conservation Camp, located at 12653 Little Tujunga Canyon Rd, Sylmar,
6 CA 91342, a juvenile camp, owned, operated, controlled, managed, maintained, inspected,
7 patrolled, and oversaw by Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a
8 public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND
9 REHABILITATION, a public entity; and DOES 1 through 100, inclusive. Plaintiff was a
10 minor dependent of the Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a
11 public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND
12 REHABILITATION, a public entity; and DOES 1 through 100, inclusive, and placed at
13 Holton Conservation Camp, a juvenile camp, for children during their pending court
14 proceedings. While in the care and custody of Defendants LOS ANGELES COUNTY FIRE
15 DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS
16 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, at Holton
17 Conservation Camp, Plaintiff was subjected to various acts of childhood sexual assault,
18 sexual abuse, sexual harassment and/or molestation. These acts of childhood sexual assault,
19 sexual abuse, sexual harassment and/or molestation were committed by other minor
20 dependents and witnessed and/or encouraged by currently unidentified staff members,
21 including but not limited to, supervisors, teachers, counselor, nurses, physicians, officers,
22 custodians, other staff members.

23
24 2. Plaintiff identified in this lawsuit was a victim of childhood sexual assault, sexual
25 abuse, sexual harassment, molestation, and other misconduct, by Defendant DOES 1 through
26 100, and Plaintiff was a minor dependent under the age of eighteen, under the care, custody
27 and control of Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public
28

1 entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a
2 public entity; and DOES 1 through 100, inclusive.

3 3. Plaintiff is informed and believes, and thereon alleges, that Defendants LOS
4 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
5 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
6 DOES 1 through 100, inclusive, failed to properly screen, hire, train and supervise the
7 employees, agents and/or individuals under Defendants LOS ANGELES COUNTY FIRE
8 DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS
9 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, control, that
10 worked with, volunteered, and or were around the minor children at camps, including but not
11 limited to, failing to perform and conduct criminal background checks on staff, officers,
12 custodians, other staff members and/or other residents and/or dependents.

13 4. Plaintiff is informed and believes, and thereon alleges, that Defendants LOS
14 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
15 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
16 DOES 1 through 100, inclusive, each owed a duty of care to supervise the minor children at
17 camps, as well as supervise the employees, agents, and staff members who worked with, and
18 around children at camps, including but not limited to, supervisors, teachers, counselors,
19 nurses, physicians, officers, custodians, other staff members.

20 5. Plaintiff is informed and believes, and thereon alleges, that due to the complete lack
21 of supervision by Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public
22 entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a
23 public entity; and DOES 1 through 100, inclusive, were allowed to perpetrate acts of sexual
24 assault, sexual abuse and/or molestation on Plaintiff.

25 6. Plaintiff is informed and believes, and thereon alleges, that Defendants LOS
26 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
27 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
28

DOES 1 through 100, inclusive, knew or should have known about the acts of sexual assault, sexual abuse and/or molestation committed by defendant DOES 1 through 100, upon Plaintiff, by way of multiple reports of sexual abuse of Plaintiff and other children under their care at camps, and other evidence of sexual assault and sexual abuse of Plaintiff and other children under their care at camps.

7. Plaintiff is informed and believes, and thereon alleges, that the supervisory employees of Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, knew or should have known that there was a failure of supervision, hiring and training of employees, agents, and staff working at camps.

8. Plaintiff is informed and believes, and thereon alleges, that at all times herein, Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, knew or should have known that it employed dangerous sexual predators at camps who were unfit, posed a risk of harm to minor children, and/or posed a risk of childhood sexual assault to minor children in Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive's care, custody and control. Specifically, Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, knew or should have known, or were otherwise on notice, that it employed employees, agents and/or staff members at camps that had engaged and/or was engaging in misconduct that created the risk of childhood sexual assault and failed to take reasonable steps or to implement reasonable safeguards to avoid acts of childhood sexual assault by these staff members on minors, including Plaintiff.

1 9. Plaintiff is informed and believes, and thereon alleges, that as employees,
2 representatives, servants, agents, and/or volunteers of Defendants LOS ANGELES
3 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
4 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
5 inclusive, the employees, agents and/or staff members of camps, including Defendant DOES
6 1 through 100, were placed into positions of guardianship and legal authority over Plaintiff.
7 As a result, there was a special, trusting, and fiduciary relationship between Plaintiff and
8 camps employees, agents and/or staff, as well as between Defendants LOS ANGELES
9 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
10 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
11 inclusive, and Plaintiff. Through this relationship with Plaintiff, Defendants LOS ANGELES
12 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
13 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
14 inclusive, stood in loco parentis with Plaintiff. Specifically, Defendants LOS ANGELES
15 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
16 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
17 inclusive, took Plaintiff into the custody, care, and control as wards of the state, which
18 conferred upon Plaintiff the reasonable belief that Plaintiff, a minor child, would be protected
19 and cared for, as if Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public
20 entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a
21 public entity; and DOES 1 through 100, inclusive, were Plaintiff's own parents.

23 10. Plaintiff is informed and believes, and thereon alleges, that Defendants LOS
24 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
25 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
26 DOES 1 through 100, inclusive, knew or should have known of the staff members at camps'
27 wrongful conduct at or about the time it was occurring, and thereafter, but took no action to
28 obstruct, inhibit or stop such continuing conduct, or to help Plaintiff endure the trauma from

1 such conduct. Despite the authority and ability to do so, Defendants LOS ANGELES
2 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
3 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
4 inclusive, negligently and/or willfully refused to, and/or did not act effectively to stop the
5 sexual assaults on Plaintiff, to inhibit or obstruct such assaults, or to protect Plaintiff from the
6 results of that trauma.

7 11. Plaintiff is informed and believes, and thereon alleges, that during the period of
8 sexual assaults perpetrated upon Plaintiff, Defendants LOS ANGELES COUNTY FIRE
9 DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS
10 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, had the
11 authority and the ability to obstruct or stop the employees, agents and/or staff members of
12 camps' sexual abuse of Plaintiff, including the acts of Defendant DOES 1 through 100, but
13 intentionally, negligently and/or willfully failed to do so, thereby allowing the assaults to
14 occur and to continue unabated.

15 12. Plaintiff is informed and believes, and thereon alleges, that at all times herein,
16 Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity;
17 CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public
18 entity; and DOES 1 through 100, inclusive, knew or should have known that Defendant
19 DOES 1 through 100 were unfit, posed a risk of harm to minor children, and/or posed a risk
20 of childhood sexual assault to minor children in Defendants LOS ANGELES COUNTY
21 FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
22 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
23 inclusive's, care, custody and control. Specifically, Defendants LOS ANGELES COUNTY
24 FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
25 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
26 inclusive, knew or should have known, or were otherwise on notice, that Defendant DOES 1
27 through 100, had engaged and/or were engaging in misconduct that created the risk of
28

1 childhood sexual assault and failed to take reasonable steps or to implement reasonable
2 safeguards to avoid acts of childhood sexual assault by Defendant DOES 1 through 100, on
3 minors, including Plaintiff.

4 13. Plaintiff is informed and believes, and thereon alleges, that at all relevant times,
5 Plaintiff and other children housed at camps were dependent on Defendants LOS ANGELES
6 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
7 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
8 inclusive, for all their basic needs, including but limited to, food, shelter, clothing, toileting,
9 medical treatment and care. At all relevant times, Plaintiff and the other children housed at
10 camps were not allowed to leave camps and were confined to camps by Defendants LOS
11 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
12 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
13 DOES 1 through 100, inclusive.

14 **PARTIES**

15 14. At all times relevant herein, plaintiff JOHN DOE C.S. was a resident of Los Angeles
16 County and a dependent child of Defendants LOS ANGELES COUNTY FIRE
17 DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS
18 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive. This action
19 is governed by Code of Civil Procedure § 340.1 because JOHN DOE C.S. is an adult who
20 was a victim of childhood sexual assault. JOHN DOE C.S. is under the age of forty (40)
21 years at the time of this filing, as such a certificate of merit is not required Pursuant to Code
22 of Civil Procedure §340.1(g)(2).

23 15. At all times relevant herein, Defendants LOS ANGELES COUNTY FIRE
24 DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS
25 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, were
26 governmental entities duly organized and existing under and by the virtue of the laws of the
27
28

1 State of California and authorized to do, and is doing, business in the State of California with
2 its principal place of business in the Los Angeles County, State of California.

3 16. At all times relevant herein, Defendants LOS ANGELES COUNTY FIRE
4 DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS
5 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, were and are
6 public entities.

7 17. At all times relevant herein, Defendants LOS ANGELES COUNTY FIRE
8 DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS
9 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, owned,
10 operated, controlled, managed, maintained, inspected, patrolled, and oversaw camps.

11 18. At all times relevant herein, Defendants LOS ANGELES COUNTY FIRE
12 DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS
13 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, were
14 responsible for the hiring, retention and supervision of all employees, agents, staff, and
15 volunteers at camps, including but not limited to, teachers, counselors, supervisory staff,
16 volunteers, officers, custodians, other staff members and all medical staff. Defendants LOS
17 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
18 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
19 DOES 1 through 100, inclusive, were also responsible for supervising and caring for the
20 needs of all the minor children residing at camps.

21 19. Defendants DOES 1 through 100, inclusive, were agents and/or employees of
22 Defendants Los Angeles County, a public entity, inclusive, and were at all times relevant
23 hereon, acting in the course and scope of their employment and/or agency with Defendants
24 LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
25 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
26 DOES 1 through 100, inclusive.
27
28

20. Defendant DOES 1 through 100, inclusive, were perpetrators of physical and sexual childhood assault against Plaintiff, as alleged herein.

21. Plaintiff is ignorant of the true names and capacities of those defendants sued herein as DOES 1 through 100 and for that reason has sued such Defendants under fictitious names. Plaintiff will seek leave of the Court to amend this Complaint to identify the DOE Defendants when their identities have been ascertained. Each of the fictitiously named DOE Defendants was in some manner liable and legally responsible for the harm sustained by Plaintiff in that their conduct caused the damages and injuries set forth herein.

22. Whenever this Complaint makes reference to any act of Defendants, such allegations shall be deemed to mean all named Defendants, or their officers, managers, representatives, employees, agents, heirs, and/or assignees, who did or authorized such acts while actively engaging in the operation, management, direction, or control of the affairs of Defendants while acting within the course and scope of their duties, except as specifically alleged to the contrary.

23. Each of the Defendants designated herein as DOE is responsible, in some manner, for the events and happenings herein referred to, thereby legally causing the injuries and damages to Plaintiff, as herein alleged.

24. At all times relevant to this Complaint, Defendants were the knowing agents, joint venturers and/or alter egos of one another, and of their co-defendants and were acting within the course and scope of their employment, agency, joint venturer, and/or alter ego relationship, and Defendants directed, ratified, and/or approved each other's conduct and that of each other's agents or employees. Defendants agreed upon, approved, or ratified each other's conduct, or otherwise conspired together to commit all of the acts and/or omissions alleged herein.

JURISDICTION & VENUE

25. This Court has jurisdiction over all causes of actions asserted in this complaint pursuant to the California Constitutional Article VI, section 10, California Code of Civil

1 Procedure section 410.10, because no cause of action contained herein is given by statute to
2 other trial courts and the amount in controversy exceeds \$25,000.00

3 26. Venue in this Court is proper pursuant to California Code of Civil Procedure sections
4 393, 394, and 395, because Defendants in this action are public agencies situated in Los
5 Angeles County and, on information and belief, all of the acts or omissions complained of in
6 this Complaint took place in Los Angeles County.

7 **CHILDHOOD SEXUAL ASSAULT, ABUSE AND/OR MOLESTATION SUFFERED**

8 **BY PLAINTIFF**

9 27. At all times relevant herein, Plaintiff was subjected to acts of childhood sexual
10 assault, harassment, abuse, and/or molestation by Defendant DOES 1 through 100, and
11 constitute childhood sexual assault within the definition of Code of Civil Procedure
12 §340.1(d). These acts of childhood sexual assault, harassment, abuse and/or molestation
13 resulted in the personal physical injury, as well as emotional, psychological, and psychiatric
14 injury and damage to Plaintiff.

15 28. Plaintiff JOHN DOE C.S. was placed at Holton Conservation Camp and was
16 physically assaulted, sexually harassed and abused by staff.

17 **STATUTE OF LIMITATIONS**

18 29. Pursuant to Code of Civil Procedure §340.1(a) as amended and made effective
19 January 1, 2023, the statute of limitations has increased to 22 years after Plaintiff reaches the
20 age of 18 (40 years of age) during which time the Plaintiff must assert his/her claim or 5
21 years after Plaintiff discovers or reasonably should have discovered the resulting
22 psychological injury or illness (delayed discovery) whichever is later. Plaintiff herein was
23 under the age of 40 years old when this action was filed.

24 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

25 30. Government Code §905(m) specifically exempts Plaintiff claims of childhood sexual
26 abuse from the requirement of filing a government tort claim.

27 **FIRST CAUSE OF ACTION**

NEGLIGENCE – Pursuant to Government Code Sections 815.2 and 820, et seq.
(By all Plaintiff Against Defendants LOS ANGELES COUNTY FIRE DEPARTMENT,
a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND
REHABILITATION, a public entity; and DOES 1 through 100, inclusive)

31. Plaintiff incorporates by reference as fully set forth herein each and every fact, claim, and allegation contained in the prior paragraphs.

32. Pursuant to Government Code section 815.2 Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, are liable for acts and omissions committed by their employees in the scope of their employment. Additionally, pursuant to Government Code section 820(a), public employees, including DOES 1 through 100, are liable for injuries caused by their acts or omissions to the same extent as a private person.

33. At all relevant times, Plaintiff was a dependent minor under the care and custody of Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive. At this time, Plaintiff was under the custody, care, supervision, and control of Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, for the purpose of providing care, supervision, and control of the minor's health, welfare, safety, and care. At such time, the rights, duties, and responsibilities of Plaintiff's parents and/or guardians were suspended, and such duties and obligations were assumed by the Defendants, and such individuals or entities to which it delegated such duties including but not limited to Defendants DOES 1 through 100.

34. At all times relevant herein, Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS

1 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, acting
2 through their agents and/or their supervisory employees, had the duty to properly hire, train,
3 supervise, and investigate their employees, staff members, teachers, counselors, medical
4 staff, officers, custodians, other staff members and/or other residents and/or dependents at
5 camps, including DOES 1 through 100, and to protect their dependent children residents
6 from harm caused by unfit and dangerous employees, staff members, teachers, counselors,
7 officers, custodians, other staff members and/or other residents and/or dependents at camps,
8 including Defendant DOES 1 through 100.

9 35. Plaintiff is informed and believes, and thereon alleges, that at all times herein,
10 Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity;
11 CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public
12 entity; and DOES 1 through 100, inclusive, knew or should have known that it employed
13 and/or housed dangerous sexual predators at camps who were unfit, posed a risk of harm to
14 minor children, and/or posed a risk of childhood sexual assault to minor children in
15 Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity;
16 CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public
17 entity; and DOES 1 through 100, inclusive, care, custody, and control, including Defendant
18 DOES 1 through 100. Specifically, Defendants LOS ANGELES COUNTY FIRE
19 DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS
20 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, knew or
21 should have known, or were otherwise on notice, that it employed staff members, including
22 Defendant DOES 1 through 100, at camps that had engaged and/or was engaging in
23 misconduct that created the risk of childhood sexual assault and failed to take reasonable
24 steps or to implement reasonable safeguards to avoid acts of childhood sexual assault by
25 these staff members and other residents and/or dependents on minors, including Plaintiff.

26 36. Plaintiff is informed and believes, and thereon alleges, that all relevant times herein,
27 as employees, representatives, servants, agents, and/or volunteers of Defendants LOS
28

1 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
2 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
3 DOES 1 through 100, inclusive, the staff members of camps were placed into positions of
4 guardianship and legal authority over Plaintiff. As a result, there was a special, trusting, and
5 fiduciary relationship between Plaintiff and camps staff, as well as between Defendants LOS
6 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
7 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
8 DOES 1 through 100, inclusive, and Plaintiff. Through this relationship with Plaintiff,
9 Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity;
10 CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public
11 entity; and DOES 1 through 100, inclusive, stood in loco parentis with Plaintiff. Specifically,
12 Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity;
13 CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public
14 entity; and DOES 1 through 100, inclusive, took Plaintiff into its custody, care, and control
15 as wards of the state, which conferred upon Plaintiff the reasonable belief that Plaintiff, a
16 minor, would be protected and cared for, as if Defendants LOS ANGELES COUNTY FIRE
17 DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS
18 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, were
19 Plaintiff's own parents.
20

21 37. Plaintiff is informed and believes, and thereon alleges, that Defendants LOS
22 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
23 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
24 DOES 1 through 100, inclusive, knew or should have known of the staff members wrongful
25 conduct at or about the time it was occurring, and thereafter, but took no action to obstruct,
26 inhibit or stop such continuing conduct, or to help Plaintiff endure the trauma from such
27 conduct. Despite the authority and ability to do so, Defendants LOS ANGELES COUNTY
28 FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF

1 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
2 inclusive, negligently and/or willfully refused to, and/or did not act effectively to stop the
3 sexual assaults on Plaintiff, to inhibit or obstruct such assault, or to protect Plaintiff from the
4 results of that trauma.

5 38. Plaintiff is informed and believes, and thereon alleges, that at all times herein,
6 Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity;
7 CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public
8 entity; and DOES 1 through 100, inclusive, knew or should have known that it employed
9 dangerous sexual predators who were unfit, posed a risk of harm to minor children, and/or
10 posed a risk of childhood sexual assault to minor children in Defendants LOS ANGELES
11 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
12 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
13 inclusive's care, custody, and control, including Defendant DOES 1 through 100.
14 Specifically, Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity;
15 CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public
16 entity; and DOES 1 through 100, inclusive, knew or should have known, or were otherwise
17 on notice, that it employed staff members, including Defendant DOES 1 through 100, that
18 had engaged and/or was engaging in misconduct that created the risk of childhood sexual
19 assault and failed to take reasonable steps or to implement reasonable safeguards to avoid
20 acts of childhood sexual assault by these staff members on minors, including Plaintiff.

21 39. Plaintiff is informed and believes, and thereon alleges, that all relevant times herein,
22 as employees, representatives, servants, agents, and/or volunteers of Defendants LOS
23 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
24 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
25 DOES 1 through 100, inclusive, the staff members were placed into positions of guardianship
26 and legal authority over Plaintiff. As a result, there was a special, trusting, and fiduciary
27 relationship between Plaintiff and staff, as well as between Defendants LOS ANGELES
28

1 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
2 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
3 inclusive, and Plaintiff. Through this relationship with Plaintiff, Defendants LOS ANGELES
4 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
5 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
6 inclusive, stood in loco parentis with Plaintiff. Specifically, Defendants LOS ANGELES
7 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
8 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
9 inclusive, took Plaintiff into its custody, care, and control as wards of the state, which
10 conferred upon Plaintiff the reasonable belief that Plaintiff, a minor, would be protected and
11 cared for, as if Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public
12 entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a
13 public entity; and DOES 1 through 100, inclusive, were Plaintiff's own parents.

14 40. Plaintiff is informed and believes, and thereon alleges, that Defendants LOS
15 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
16 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
17 DOES 1 through 100, inclusive, knew or should have known of the staff members' wrongful
18 conduct at or about the time it was occurring, and thereafter, but took no action to obstruct,
19 inhibit or stop such continuing conduct, or to help Plaintiff endure the trauma from such
20 conduct. Despite the authority and ability to do so, Defendants LOS ANGELES COUNTY
21 FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
22 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
23 inclusive, negligently and/or willfully refused to, and/or did not act effectively to stop the
24 sexual assaults on Plaintiff, to inhibit or obstruct such assault, or to protect Plaintiff from the
25 results of that trauma.

26
27 41. Plaintiff is informed and believes, and thereon alleges that Defendants LOS
28 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA

1 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
2 DOES 1 through 100, inclusive, including their officers, custodians, other staff members
3 and/or other residents and/or dependents, knew of the serious complaints of sexual
4 misconduct perpetrated by their employees, agents, officers, custodians, other staff members
5 and/or other residents and/or dependents, including DOES 1 through 100, who were
6 employed and/or volunteer at camps and responsible for the care of the minor children living
7 camps, including Plaintiff.

8 42. Plaintiff is informed and believes, and thereon alleges, that Defendants LOS
9 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
10 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
11 DOES 1 through 100, inclusive, failed to properly and adequately investigate the serious
12 complaints of sexual misconduct and failed to take appropriate disciplinary action against the
13 accused perpetrators, including Defendant DOES 1 through 100.

14 43. Plaintiff is informed and believes, and thereon alleges, that complaints of sexual
15 misconduct were made against employees and agents, including Defendant DOES 1 through
16 100, inclusive, prior to the abuse of Plaintiff.

17 44. Plaintiff is informed and believes, and thereon alleges, that during the period of
18 sexual assaults perpetrated upon Plaintiff, Defendants LOS ANGELES COUNTY FIRE
19 DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS
20 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, had the
21 authority and the ability to obstruct or stop the employees, staff members, teachers,
22 counselors, medical staff, officers, custodians, other staff members and/or other residents
23 and/or dependents sexual abuse of Plaintiff, but intentionally, negligently and/or willfully
24 failed to do so, thereby allowing the assault to occur and to continue unabated.

25 45. Plaintiff is informed and believes, and thereon alleges, that Defendants LOS
26 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
27 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
28

DOES 1 through 100, inclusive, acts, omissions, and/or failure to set up adequate safeguards, allowed the sexual abuse of Plaintiff to occur and/or continue. Plaintiff is further informed and believes, and thereon alleges, that Plaintiff would not have faced any sexual abuse if Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, inclusive, had fulfilled their duties and responsibilities, and/or provided adequate protection and safety.

46. Plaintiff is informed and believes, and thereon alleges, that Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, breached their mandatory duty to Plaintiff by failing to properly and adequately hire, train, supervise and investigate Defendant DOES 1 through 100, and other employees and/or agents responsible for, and charged with, the care of dependent children, including Plaintiff.

47. Plaintiff is informed and believes, and thereon alleges, that had Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, acting through their agents and supervisory employees, properly and adequately supervised, trained, monitored, and investigated the conduct and actions of Defendant DOES 1 through 100, Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, would have known and/or discovered that Defendant DOES 1 through 100 were unfit to be employed and/or volunteer and have access to minor children.

48. Plaintiff is informed and believes, and thereon alleges, that as a result of Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and

DOES 1 through 100, inclusive's, failure to adequately supervise, train, monitor, and investigate the conduct and actions of Defendant DOES 1 through 100, Defendant DOES 1 through 100, were enabled to commit abuses against the children unhindered, including sexual abuses against Plaintiff.

49. Plaintiff is informed and believes, and thereon alleges, that Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, inclusive, through their agents and administrators, negligently hired, supervised, retained, monitored, observed, and investigated Defendant DOES 1 through 100, and negligently failed to ensure the safety of the minor children entrusted to their custody, care, and control, including Plaintiff.

50. Plaintiff is informed and believes, and thereon alleges, that Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, negligently failed to implement or enforce any procedures, policies, rules, regulations and/or safeguards that were for the purpose of preventing, deterring, and/or detecting sexual abuse, sexual assault and/or molestation of minor children by employees and/or volunteers, including Defendant DOES 1 through 100.

51. Plaintiff is informed and believes, and thereon alleges, that had Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, adequately and properly hired, trained, oversaw, supervised and investigated Defendant DOES 1 through 100, and had Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, adequately and properly implemented and/or enforced policies, procedures, rules and regulations for the purpose of preventing, detecting and/or deterring sexual abuse, sexual

1 assault and/or sexual molestation, and had Defendants LOS ANGELES COUNTY FIRE
2 DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS
3 AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, fulfilled
4 their duties and responsibilities, and/or provided adequate protection and safety, Plaintiff
5 would not have been subject to the sexual abuse, sexual assault and/or sexual molestation
6 inflicted upon him by Defendant DOES 1 through 100.

7 52. Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity;
8 CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public
9 entity; and DOES 1 through 100, inclusive's negligence was a substantial factor in causing
10 Plaintiff's harm.

11 53. As a direct and legal result of the acts and omissions of Defendants LOS ANGELES
12 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
13 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
14 inclusive, Plaintiff suffered psychological, mental, and/or emotional injuries, including
15 economic and non-economic damages in an amount to be determined at the time of trial,
16 subject to proof at the time of trial, and that exceed the jurisdictional limits of this Court.

17 54. As a direct and proximate result of the childhood sexual assault, harassment and
18 abuse committed against Plaintiff by Defendant DOES 1 through 100 and other staff
19 members and/or officers, custodians, other staff members and/or other residents and/or
20 dependents, which was enabled and facilitated by Defendants LOS ANGELES COUNTY
21 FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
22 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
23 inclusive, Plaintiff has suffered personal physical injury of sexual assault, and have and will
24 continue to suffer, psychological, mental and emotional distress, including economic and
25 non-economic damages in an amounts to be determined at the time of trial, subject to proof at
26 the time of trial, and that exceed the jurisdictional limits of this Court.

27
28 **SECOND CAUSE OF ACTION**

BREACH OF MANDATORY DUTIES

(By Plaintiff Against Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive)

55. Plaintiff repeats, re-alleges, and incorporates herein by reference all prior paragraphs, as though fully set forth herein.

56. Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, were obligated by constitutional provisions, statutes, and/or regulations to document, report, and subsequently inform others, about Plaintiff's childhood sexual abuse.

57. Plaintiff is informed and believes, and thereon alleges, that Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, knew and/or had sufficient reason to believe that Plaintiff was being sexually abused.

58. Plaintiff is informed and believes, and thereon alleges, Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, refused and/or failed to take appropriate action to investigate and stop the sexual abuse. Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, did not report the information and they did not inform others about the known dangers and/or sexual abuse that Plaintiff was suffering.

59. Plaintiff is informed and believes, and thereon alleges, Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,

1 inclusive, violated and/or breached mandatory and nondelegable duties. This includes,
2 mandatory and nondelegable duties aimed at the protection and safety of children under the
3 care, custody and control of Defendants LOS ANGELES COUNTY FIRE DEPARTMENT,
4 a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND
5 REHABILITATION, a public entity; and DOES 1 through 100, inclusive, which include, but
6 is not limited to, those set forth regulations in the California Department of Social Services
7 (CDSS) Manual of Policies and Procedures (MPP) established pursuant to Welfare &
8 Institutions Code Section 165101, and set forth in the California Penal Code, including but
9 not limited to, Section 1311164, et seq.

10 60. Plaintiff is informed and believes, and thereon alleges, Defendants LOS ANGELES
11 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
12 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
13 inclusive, failed to adhere to and/or fulfill these mandatory duties put in place for the
14 protection and safety of children under the care, custody and control of Defendants LOS
15 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
16 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
17 DOES 1 through 100, inclusive.

18 61. Plaintiff is informed and believes, and thereon alleges, Defendants LOS ANGELES
19 COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF
20 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
21 inclusive, did not comply with these duties. They failed to report Plaintiff's sexual abuse,
22 failed to report Plaintiff's sexual abuse to law enforcement, and failed to set up safeguards
23 and/or act to remove Plaintiff from the environment of abuse once Defendants LOS
24 ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA
25 DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and
26 DOES 1 through 100, inclusive, had notice of the sexual abuse.
27
28

62. Plaintiff is informed and believes, and thereon alleges, Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, failed to diligently discharge their duties and obligations to protect and keep children safe that are under their care, custody and control, and that failure was a substantial factor and/or direct proximate cause of severe injuries caused to Plaintiff. Had Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive complied with and/or fulfilled their mandatory obligations, Plaintiff's sexual abuse would not have occurred and/or would have ended earlier. The case reviews, reporting, and disclosures were protections and safeguards meant to protect against the exact type of harm Plaintiff suffered.

63. Plaintiff is informed and believes, and thereon alleges, Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, acts and/or omissions were the proximate, legal causes of the damages sustained by Plaintiff, and Plaintiff has suffered psychological, mental, and/or emotional injuries, including economic and non-economic damages in an amount to be determined at the time of trial, subject to proof at the time of trial, and that exceed the jurisdictional limits of this Court.

THIRD CAUSE OF ACTION

INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(By Plaintiff Against DOES 1 through 100, inclusive)

64. Plaintiff repeats, re-alleges, and incorporates herein by reference all prior paragraphs, as though fully set forth herein.

65. At the time of the incidents described above, Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF

1 CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100,
2 inclusive, the employees, agents and/or staff members' conduct as alleged herein was beyond
3 the bounds of decency accepted within society and was intentional, outrageous, malicious,
4 and committed for the purpose of causing Plaintiff to suffer humiliation, embarrassment,
5 mental anguish, and/or severe physical and/or emotional distress, or done in reckless
6 disregard of the probability of causing Plaintiff to suffer humiliation, embarrassment, mental
7 anguish, and/or severe physical and/or emotional distress.

8 66. Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity;
9 CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public
10 entity; and DOES 1 through 100, inclusive, the employees, agents and/or staff members,
11 were in a position of authority, trust, influence, and persuasion over Plaintiff and responsible
12 for maintaining a special relationship.

13 67. Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity;
14 CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public
15 entity; and DOES 1 through 100, inclusive, the employees, agents and/or staff members'
16 abuse of Plaintiff was an abuse of their authority as an employee, agent, staff, and officers,
17 custodians, other staff members, including but not limited to, teachers, counselors,
18 supervisory staff, volunteers, officers, custodians, other staff members and all medical staff
19 of Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity;
20 CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public
21 entity; and DOES 1 through 100, inclusive and performed while in the course and scope of
22 their employment.

23
24 68. Plaintiff's trust in Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a
25 public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND
26 REHABILITATION, a public entity; and DOES 1 through 100, inclusive, the employees,
27 agents and/or staff members for Plaintiff's safety and wellbeing, turned to fear and
28 intimidation by virtue of Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a

1 public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND
2 REHABILITATION, a public entity; and DOES 1 through 100, inclusive, the employees,
3 agents and/or staff members' conduct.

4 69. Plaintiff contends that said misconduct was authorized, ratified, adopted and/or
5 approved of by Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public
6 entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a
7 public entity; and DOES 1 through 100, inclusive.

8 70. The conduct of Defendants DOES 1 through 100, inclusive, as alleged herein was
9 beyond the bounds of decency accepted within society and was intentional, outrageous,
10 malicious, and committed for the purpose of causing Plaintiff to suffer humiliation,
11 embarrassment, mental anguish, and/or severe physical and/or emotional distress, or done in
12 reckless disregard of the probability of causing Plaintiff to suffer humiliation,
13 embarrassment, mental anguish, and/or severe physical and/or emotional distress.

14 71. As a direct and proximate result of the conduct as herein alleged, Plaintiff has
15 suffered great mental pain, embarrassment, humiliation, distress, anguish, and suffering, all
16 to his damages in an amount according to proof at trial.

17 72. The conduct of Defendants DOES 1 through 100, inclusive, described herein was
18 intentional and malicious and done for the purpose of causing, or with the substantial
19 certainty that such conduct would cause Plaintiff to suffer humiliation, mental anguish, and
20 emotional and physical distress.

21 73. Defendants DOES 1 through 100, inclusive, acted willfully and maliciously with the
22 intent to harm Plaintiff, and in conscious disregard of Plaintiff's rights, so as to constitute
23 malice and/or oppression under California Civil Code § 3294 thereby entitling them to
24 punitive damages according to proof.

25 ///

26 ///

27 **PRAYER FOR RELIEF**
28

Wherefore, Plaintiff JOHN DOE C.S., prays for Judgment against Defendants LOS ANGELES COUNTY FIRE DEPARTMENT, a public entity; CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, a public entity; and DOES 1 through 100, inclusive, as follows:

1. For past, present, and future general damages in an amount to be determined at trial;
2. For past, present, and future special damages, including but not limited to past, present and future lost earnings, economic damages, and others, in an amount to be determined at trial;
3. Any appropriate statutory damages, including treble damages and attorneys' fees;
4. Punitive damages
5. For costs of suit;
6. For pre- and post-judgment interest as allowed by law;
7. For attorney's fees pursuant to the aforementioned statutes and otherwise allowable by law:
 - a. California Code of Civil Procedure § 1021.5;
 - b. California Code of Civil Procedure § 1021.4;
 - c. California Civil Code §52;
8. For such other and further relief as the court may deem proper.

DATED: September 9, 2025

DOWNTOWN L.A. LAW GROUP



Jordan Duncan-Smith, Esq.
Attorney for Plaintiff,
JOHN DOE C.S.

DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury of all issues so triable.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DATED: September 9, 2025

DOWNTOWN L.A. LAW GROUP



Jordan Duncan-Smith, Esq.
Attorney for Plaintiff,
JOHN DOE C.S.