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CLIFTON PLEASANT, JR.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CLIFTON PLEASANT, JR., an individual and successor-in-interest of CLIFTON PLEASANT, SR., deceased;

Plaintiff,

v.

HUMBERTO MIRANDA, an individual; TARRON BROADWAY, an individual; UNIDENTIFIED DEPUTIES, individuals; CITY OF VICTORVILLE, a public entity; COUNTY OF SAN BERNARDINO, a public entity; MILES KOWALSKI, an individual,

Defendants.

Case No.: 5:20-cv-00675-JGB-SHK

FIRST AMENDED COMPLAINT FOR DAMAGES OF

- 1) Failure to Protect (42 U.S.C. § 1983)**
- 2) Due Process—Interference with Parent/Child Relationship (42 U.S.C. § 1983)**
- 3) Due Process—State Created Danger (42 U.S.C. § 1983)**
- 4) Monell Claim (42 U.S.C. § 1983)**
- 5) Bane Act Violation (Civil Code § 52.1)**
- 6) Negligence**
- 7) Violation of California’s Public Records Act (Cal. Gov’t Code §§ 6250, et seq.)**

DEMAND FOR JURY TRIAL

DECLARATION OF CLIFTON PLEASANT, JR.

1
2 COMES NOW, Plaintiff, CLIFTON PLEASANT, JR., an individual and
3 successor-in-interest of CLIFTON PLEASANT, SR., deceased, for his claims against
4 Defendants, HUMBERTO MIRANDA, an individual; TARRON BROADWAY, an
5 individual; JULIAN MATA, an individual; JORGE PALACIOS, an individual;
6 OMAR ROMERO, an individual; CITY OF VICTORVILLE, a public entity;
7 COUNTY OF SAN BERNARDINO, a public entity; MILES KOWALSKI, an
8 individual, and each of them, complains and alleges as follows:

9 **INTRODUCTION**

10 1. This civil rights action seeks compensatory and punitive damages from
11 Defendants for violating various rights under state law and the United States
12 Constitution in connection with the death of CLIFTON PLEASANT, SR., while he
13 was taken into custody on or about July 2, 2019, and released when CLIFTON
14 PLEASANT, SR., was inebriated and a danger to himself and to others.

15 **PARTIES**

16 2. At all relevant times, Plaintiff, CLIFTON PLEASANT, JR. (hereinafter
17 “Plaintiff”), an individual and successor-in-interest of CLIFTON PLEASANT, SR.,
18 deceased (hereinafter “Decedent”), is and was a resident of the County of Los
19 Angeles, State of California. Plaintiff is the only son and issue of the Decedent.
20 Plaintiff has the superior right to bring this lawsuit as an individual and as a successor-
21 in-interest pursuant to California Code of Civil Procedure §§ 377.11, 377.30.

22 3. At all times herein relevant, Plaintiff is informed and believes, Defendant
23 CITY OF VICTORVILLE (“CITY”), is and was a duly organized public entity, form
24 unknown, existing under the laws of the State of California.

25 4. At all times herein relevant, Plaintiff is informed and believes, Defendant
26 COUNTY OF SAN BERNARDINO (“COUNTY”), is and was a duly organized
27 public entity, form unknown, existing under the laws of the State of California.

28 5. At all times herein mentioned, Defendant CITY and COUNTY have possessed
the power and authority to adopt policies and prescribe rules, regulations and practices

1 affecting the Victorville Police Department (“VPD”), and particularly said
2 Department’s Patrol, Internal Investigations and Training, and Personnel Divisions
3 and other operations and subdivisions presently unidentified to Plaintiff, and their
4 tactics methods, practices, customs and usages. Defendant COUNTY has contracted
5 with Defendant CITY regarding the services and policing actions of the VPD.

6 6. At all relevant times, CITY and COUNTY were the employers of Defendants
7 HUMBERTO MIRANDA, TARRON BROADWAY, JULIAN MATA, JORGE
8 PALACIOS, OMAR ROMERO, and UNIDENTIFIED DEPUTIES (hereinafter the
9 “Responding Deputies”), and said individuals were employees and agents of CITY,
10 COUNTY, and VPD.

11 7. At all relevant times, Defendants Responding Deputies, and each of them,
12 were duly authorized employees and agents of the CITY and COUNTY, who were
13 acting under color of law within the course and scope of their respective duties as
14 Peace Officers and with the complete authority and ratification of their principal,
15 Defendants CITY and COUNTY, which are additionally liable in respondeat superior
16 pursuant to section 815.2 of the California Government Code for the acts of said
17 Defendants which are alleged herein.

18 8. At all times relevant, Defendants Responding Deputies, and each of them,
19 were duly appointed officers and/or employees or agents of CITY and COUNTY,
20 subject to oversight and supervision by CITY’s and COUNTY’s elected and non
21 elected officials.

22 9. At all relevant times, Defendant MILES KOWALSKI, an individual, was an
23 employee and agent of Defendant COUNTY authorized to act on behalf of Defendant
24 COUNTY’s response and compliance to Plaintiff’s California Public Records Act
25 requests.

26 10. At all times mentioned herein, each and every defendant was the agent of each
27 and every other defendant and had the legal duty to oversee and supervise the hiring,
28 conduct and employment of each and every defendant herein.

1 11. The true names of defendants UNIDENTIFIED DEPUTIES, are unknown to
2 Plaintiff, who therefore sues these defendants by such fictitious names as Defendants
3 CITY and COUNTY refused to properly identify said deputies as alleged *infra*.
4 Plaintiff will seek leave to amend this complaint to show the true names and capacities
5 of these defendants when they have been ascertained. Each of the UNIDENTIFIED
6 DEPUTIES are responsible in some manner for the conduct and liabilities alleged
7 herein.

8 12. In doing the acts and failing and omitting to act as hereinafter described,
9 Defendants Responding Deputies, and each of them, were acting on the implied and
10 actual permission and consent of CITY and COUNTY.

11 13. Prior to the commencement of this action, Plaintiff presented a government
12 tort claim with CITY and COUNTY in full and timely compliance with the California
13 Tort Claim Act. Said claim has been expressly denied or denied by operation of law
14 by CITY and COUNTY. Plaintiff has complied with the requirements of the
15 Government Code for the timely filing of formal claims with CITY and COUNTY.

16 14. At all times herein relevant, Defendants CITY and COUNTY were the
17 employer and/or principal of the Responding Deputies herein, and/or were and are
18 legally responsible for the acts, omissions, and conduct of the Responding Deputies
19 herein, within the meaning of Government Code §§ 815.2(a), 815.4, 820(a), among
20 other provisions, and are liable to Plaintiff by reason thereof.

21 15. At all times herein relevant, Defendants Responding Deputies, and each of
22 them, were and are legally responsible for their acts, omissions, and conduct that gives
23 rise to this lawsuit, within the meaning of Government Code § 820(a), among other
24 provisions, and are liable to Plaintiff by reason thereof.

25 16. Defendants Responding Deputies, and each of them, did the acts and
26 omissions hereinafter alleged wilfully, intentionally, maliciously, in bad faith and with
27 knowledge that their conduct violated well established and settled law.

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1 **JURISDICTION AND VENUE**

2 17. This civil action is brought for the redress of alleged deprivations of
3 constitutional rights as protected by the U.S. Constitution, the Fourteenth
4 Amendment, and 42 U.S.C. § 1983. Jurisdiction is founded on 28 U.S.C. §§ 1331,
5 1367.

6 18. Venue is proper in this Court under 28 U.S.C. § 1391(b), because Defendants
7 reside in, and all incidents, events, and occurrences giving rise to this action occurred
8 in County of San Bernardino, State of California.

9 **FACTS COMMON TO ALL CLAIMS FOR RELIEF**

10 19. Plaintiff re-alleges and incorporates herein by reference each and every
11 allegation and statement contained in the prior paragraphs, as though fully set forth
12 herein.

13 20. On July 1, 2019, Plaintiff was at a residence located at 12720 Banyon Tree
14 Lane, Victorville, California 92392, with Dada Iverson Thomas, an individual named
15 Ivory, and Nicole Marie Fischer. The Decedent arrived at the residence shortly before
16 midnight, was visibly intoxicated on drugs and/or alcohol, was destructive, and was a
17 danger to his own safety and to the safety others. The police were called, and on or
18 about July 2, 2019, just after midnight, Responding Deputies arrived at the residence
19 at Banyon Tree Lane and made contact with Decedent. Due to Decedent's visibly
20 intoxicated state and his danger to himself and to others as known by Responding
21 Deputies, Responding Deputies arrested Decedent and drove away with Decedent in
22 custody in Responding Deputies' patrol vehicle. Responding Deputies' custodial
23 duties required them to take Decedent to the Victor Valley Station for booking and to
24 maintain Decedent in custody there until he was no longer intoxicated and a danger to
25 his own safety and the safety of others. Instead of doing so, Responding Deputies
26 dropped Decedent off at a Motel 6 and released him from custody when he was still
27 visibly intoxicated and incapable of taking care of himself. The desk clerk at the
28 Motel 6 later called the police on Decedent as he was being destructive in the lobby of

1 the Motel 6. After around 1:30 a.m. on July 2, 2019, Responding Deputies return to
2 Motel 6 and again place Decedent under arrest, take him into custody, and drive
3 Decedent off in their patrol vehicle as he was still visibly intoxicated and a danger to
4 his own safety and the safety of others. Instead of taking Decedent to the Victor
5 Valley Station, Responding Deputies drop Decedent off at the Green Tree Inn located
6 at 14173 Green Tree Boulevard, Victorville, California 92395, and leave him there
7 while Decedent is still visibly intoxicated, a danger to his own safety, and a danger to
8 the safety of others. Next, Decedent, while being in a state unable to take care of
9 himself, wanders onto the I-15 freeway nearby where he is struck by a passing vehicle
10 driven by Nicole Fischer and ultimately leading to Decedent's death.

11 21. On July 2, 2019, Responding Deputies knew that Decedent was intoxicated
12 and a danger to his own safety and the safety of others, knew that Decedent must be
13 kept in custody until he was no longer intoxicated, and knew that Decedent would
14 face great bodily harm and death if Decedent was not kept in custody, yet in reckless
15 disregard of that knowledge, the Responding Deputies released Decedent even though
16 a reasonable deputy in the Responding Deputies' position would have appreciated the
17 high degree of risk and harm involved. The Responding Deputies were deliberately
18 indifferent to the substantial risk of harm that Decedent faced.

19 22. On July 2, 2019, Lasandra Benford, the biological mother of Plaintiff, called
20 the Victor Valley Station to obtain information regarding where Decedent was taken
21 into custody, and the Victor Valley Station operator indicated that Decedent was never
22 brought into the station and was dropped off at a hotel.

23 23. Plaintiff is informed and believes and thereon alleges Defendants Responding
24 Deputies and MILES KOWALSKI quickly reached a meeting of minds to cover up
25 their illegal behavior and conspired with one another to fabricate facts and details
26 regarding Decedent's incident, withhold and/or destroy evidence of the incident, and
27 put themselves in the best possible but false light, attempting to justify their failures as
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1 alleged herein, all in violation of Decedent's and Plaintiff's rights against this manner
2 of misconduct under California and federal law.

3 24. The aforementioned incident caused Decedent's death and to suffer pre-death
4 pain and suffering and loss of life, and Plaintiff to suffer damages, all to be proven at
5 the time of trial.

6 **FACTS RELATED TO PLAINTIFF'S PUBLIC RECORDS ACT REQUEST**

7 25. On July 26, 2019, Plaintiff submitted a California Public Records Act
8 ("CPRA", Gov't Code §§ 6250, et seq.) Request to the San Bernardino County
9 Sheriff's Department requesting: (1) all incident, contact, and reports concerning
10 Decedent's incident on July 2, 2019; (2) all probable cause declarations or reports
11 related to Decedent's arrest or contact; (3) all photographs of Decedent's arrest or
12 contact; (4) all videos concerning the arrest or contact of Decedent, including body
13 camera videos and MVARs; (5) all evidence gathered by Deputies; (6) the identity of
14 the Deputies who contacted Decedent; (7) the identity of the Deputies who arrested
15 Decedent; (8) all custody logs of Decedent; (9) all booking evidence of Decedent; (10)
16 all documents evidencing Decedent's release from custody; (11) the identity of the
17 Deputies who released Decedent from custody; (12) the time in which Decedent was
18 released from custody; and, (13) all witness statements related to the incident.

19 Plaintiff's request fully complied with the CPRA.

20 26. On August 20, 2019, Plaintiff had not received a response to his July 26, 2019
21 CPRA request, so another request was sent to the San Bernardino County Sheriff's
22 Department on August 20, 2019, requesting the same evidence and information from
23 the July 26, 2019 CPRA request.

24 27. On August 29, 2019, MILES KOWALSKI responded on behalf of the San
25 Bernardino County Sheriff's Department to Plaintiff's July 26, 2019 CPRA request,
26 and produced only a one-page redacted CAD Log concerning calls for Decedent being
27 hit on the I-15 freeway. The CAD Log did not reflect any of the information
28 concerning Decedent's contact, arrest, custody, and/or release, or the involved

1 deputies. MILES KOWALSKI claimed that the “Department does not possess arrest
2 information for July 2, 2019,” but also claimed records were privileged pursuant to
3 Government Code section 6254(f).

4 28. On September 2, 2019, Plaintiff responded to MILES KOWALSKI indicating
5 that Mr. Kowalski’s response is unclear if any documents are being withheld, and if
6 so, that a privilege log needs to be provided. Plaintiff further provided that “[s]pecific
7 with detentions and arrests of citizens, the legislative intent in requiring disclosure
8 under the Public Records Act of arrest, detention, and contact information was to
9 continue common-law tradition of contemporaneous disclosure of individualized
10 arrest information to prevent secret arrests and to mandate continued disclosure of
11 customary and basic law enforcement information to the public. (*County of Los*
12 *Angeles v. Superior Court* (1993) 18 Cal.App.4th 588.) And, any omitted information
13 of facts and circumstances of arrests is deemed non-complaint with the California
14 Public Records Act. (*Fredericks v. Superior Court* (2015) 233 Cal.App.4th 209.)”
15 Plaintiff again requested that the San Bernardino County Sheriff’s Department
16 complies with the CPRA and produce the original thirteen (13) items requested.

17 29. On September 9, 2019, Plaintiff sent a different CPRA request to the San
18 Bernardino County Sheriff’s Department requesting: (1) all 911 audio calls made from
19 or near 12720 Banyon Tree Lane, Victorville, CA 92392, from 10:00 p.m. on July 1,
20 2019 through 3:00 a.m. on July 2, 2019; and (2) 911 call logs regarding the same.
21 Plaintiff’s request fully complied with the CPRA.

22 30. On September 16, 2019, County Counsel for the San Bernardino County
23 Sheriff’s Department sent an email to Plaintiff’s Counsel claiming “[t]here are no
24 arrests for Mr. Pleasant, from January 1, 2019 to July 2, 2019,” which was and is an
25 untrue statement.

26 31. On September 24, 2019, MILES KOWALSKI responded to Plaintiff’s
27 September 9, 2019 CPRA request and objected to producing responsive documents by
28 claiming said records were privileged pursuant to Government Code section 6254(f).

1 32. On October 22, 2019, MILES KOWALSKI responded to Plaintiff's
2 September 2, 2019 CPRA request and produced a two-page CAD Log for the contact
3 of Decedent at Motel 6 only, and no documents were produced regarding the contact
4 of Decedent at 12720 Banyon Tree Lane, Victorville, CA 92392, including the
5 identity of the deputies at Bayon Tree Lane. Additionally, MILES KOWALSKI did
6 not produce documents and information responsive to all thirteen (13) requests made
7 in Plaintiff's September 2, 2019 CPRA request.

8 33. On information and belief, Plaintiff believes that other individuals are legally
9 responsible for the death of Decedent, but for Defendant MILES KOWALSKI's
10 failure to properly comply with the California Public Records Act, Plaintiff was
11 precluded from properly identifying other culpable individuals.

12 **FIRST CLAIM FOR RELIEF**

13 **Failure to Protect (42 U.S.C. § 1983)**

14 **(Against Responding Deputies)**

15 34. Plaintiff re-alleges and incorporates herein by reference each and every
16 allegation and statement contained in paragraphs 19 through 33, as though fully set
17 forth herein.

18 35. Plaintiff brings this claim as the successor-in-interest of Decedent pursuant to
19 Code of Civil Procedure Sections 377.11, 377.30.

20 36. The actions and inactions of Defendants Responding Deputies, as described
21 above, deprived Decedent of the following clearly established rights under the United
22 States Constitution, including, but not limited to the right to be protected while in
23 custody as secured by the Fourth and Fourteenth Amendments, the right to be free
24 from unlawful, reckless, deliberately indifferent, and conscience shocking failure to
25 provide safe conditions of confinement as secured by the Fourteenth Amendment, and
26 the right to procedural and substantive due process as secured by the Fourteenth
27 Amendment.

1 37. During all times mentioned herein, Defendants Responding Deputies,
2 separately and in concert, acted under color and pretense of law, under color of the
3 statutes, ordinances, regulations, policies, practices, customs and usages of their
4 principals, Defendants CITY and COUNTY. Each of the individual Defendants
5 herein, separately and in concert, deprived Decedent of the rights, privileges and
6 immunities secured to him by the Fourth and Fourteenth Amendments to the United
7 States Constitution, and by the laws of the United States.

8 38. The above acts of omissions of Defendants Responding Deputies were
9 undertaken while under color of state law and resulted in the violation of Decedent's
10 constitutional rights, as stated herein.

11 39. The actions of Defendants Responding Deputies, and each of them, deprived
12 Decedent of his right to be free from state actions that shock the conscience under the
13 Fourteenth Amendment's Due Process Clause.

14 40. As a result of the conduct of Defendants Responding Deputies, and each of
15 them, they are liable for Decedent's harm and death, either because they were integral
16 participants in the violations described herein, or because they failed to intervene to
17 prevent these violations. Defendants actions and/or omissions were the direct and
18 proximal cause of Decedent's damages and death.

19 41. As a direct and proximate result of the death of Decedent by the above-
20 described conduct of Defendants Responding Deputies, the Decedent sustained
21 general damages, including pre-death pain and suffering, and loss of enjoyment of life
22 and other hedonic damages in an amount according to proof at trial.

23 42. The conduct of Defendants Responding Deputies was willful, wanton,
24 malicious and done with an evil motive and intent and a reckless disregard for the
25 rights and safety of Decedent, and therefore warrants the imposition of exemplary and
26 punitive damages as to Defendants.

27 43. Accordingly, Defendants Responding Deputies are liable to Plaintiff for
28 compensatory and punitive damages under 42 U.S.C. § 1983.

SECOND CLAIM FOR RELIEF

**Due Process—Interference with Parent/Child Relationship (42 U.S.C. § 1983)
(Against Responding Deputies)**

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4 44. Plaintiff re-alleges and incorporates herein by reference each and every
5 allegation and statement contained in paragraphs 19 through 33, as though fully set
6 forth herein.

7 45. This claim arises under 42 U.S.C. § 1983 and the United States Constitution,
8 the laws of the State of California, and common law principles to redress a deprivation
9 under color of state law of rights, privileges and immunities secured to Plaintiff by
10 said statutes, and by the Fourteenth Amendment of the United States Constitution Due
11 Process Clause.

12 46. Parents and children possess a constitutionally protected liberty interest in
13 companionship and society with each other.

14 47. Defendants Responding Deputies, and each of them, actions and inactions
15 deprived Plaintiff of both procedural due process and substantive due process as
16 guaranteed to the Plaintiff under the Fourteenth Amendment of the United States
17 Constitution when Defendants Responding Deputies' actions and inactions
18 proximately caused Decedent's death. Defendant Responding Deputies' actions and
19 inactions did not further any legitimate state interest and were oppressive and shock
20 the conscience under under the Fourteenth Amendment's Due Process Clause and
21 were done with deliberate indifference to Plaintiff's right to be free from state actions.

22 48. The above acts of omissions of Defendants Responding Deputies were
23 undertaken while under color of state law and resulted in the violation of Plaintiff's
24 constitutional rights, as stated herein.

25 49. The actions of Defendants Responding Deputies, and each of them, deprived
26 Plaintiff of his right to be free from state actions that shock the conscience under the
27 Fourteenth Amendment's Due Process Clause.

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1 50. As a result of the conduct of Defendants Responding Deputies, and each of
2 them, they are liable for Decedent's harm and death, either because they were integral
3 participants in the violations described herein, or because they failed to intervene to
4 prevent these violations. Defendants actions and/or omissions were the direct and
5 proximal cause of Decedent's death and Plaintiff's damages.

6 51. As a direct and proximate result of the death of Decedent by the above-
7 described conduct of Defendants Responding Deputies, Plaintiff has sustained
8 substantial non-economic damages of pain and suffering and emotional distress
9 resulting from the loss of the love, companionship, comfort, affection, society,
10 attention, services, and moral support damages of this Decedent in an amount
11 according to proof at trial.

12 52. The conduct of Defendants Responding Deputies was willful, wanton,
13 malicious and done with an evil motive and intent and a reckless disregard for the
14 rights and safety of Decedent and the rights of Plaintiff, and therefore warrants the
15 imposition of exemplary and punitive damages as to Defendants.

16 53. Accordingly, Defendants Responding Deputies are liable to Plaintiff for
17 compensatory and punitive damages under 42 U.S.C. § 1983.

18 **THIRD CLAIM FOR RELIEF**

19 **Due Process—State Created Danger (42 U.S.C. § 1983)**

20 **(Against Responding Deputies)**

21 54. Plaintiff re-alleges and incorporates herein by reference each and every
22 allegation and statement contained in paragraphs 19 through 33, as though fully set
23 forth herein.

24 55. Plaintiff brings this claim as an individual and the successor-in-interest of
25 Decedent pursuant to Code of Civil Procedure Sections 377.11, 377.30, 377.62.

26 56. This claim arises under 42 U.S.C. § 1983 and the United States Constitution,
27 the laws of the State of California, and common law principles to redress a deprivation
28 under color of state law of rights, privileges and immunities secured to Decedent and

1 to Plaintiff by said statutes, and by the Fourteenth Amendment of the United States
2 Constitution Due Process Clause.

3 57. Defendants Responding Deputies' actions placed Decedent in an actual,
4 particularized danger by creating and exposing Decedent to the danger as alleged
5 herein which Decedent would not have faced but for Defendants' actions.

6 58. By Defendants Responding Deputies' acts and omissions, Defendants acted
7 with deliberate indifference to the known and obvious danger to Decedent's health
8 and safety.

9 59. As a result of the conduct of Defendants Responding Deputies, and each of
10 them, they are liable for Decedent's harm and death, either because they were integral
11 participants in the violations described herein, or because they failed to intervene to
12 prevent these violations. Defendants actions and/or omissions were the direct and
13 proximal cause of Decedent's death and Plaintiff's damages.

14 60. As a direct and proximate result of the death of Decedent by the above-
15 described conduct of Defendants Responding Deputies, the Decedent sustained
16 general damages, including pre-death pain and suffering, and loss of enjoyment of life
17 and other hedonic damages in an amount according to proof at trial, and Plaintiff has
18 sustained substantial non-economic damages of pain and suffering and emotional
19 distress resulting from the loss of the love, companionship, comfort, affection, society,
20 attention, services, and moral support damages of this Decedent in an amount
21 according to proof at trial.

22 61. The conduct of Defendants Responding Deputies was willful, wanton,
23 malicious and done with an evil motive and intent and a reckless disregard for the
24 rights and safety of Decedent and the rights of Plaintiff, and therefore warrants the
25 imposition of exemplary and punitive damages as to Defendants.

26 62. Accordingly, Defendants Responding Deputies are liable to Plaintiff for
27 compensatory and punitive damages under 42 U.S.C. § 1983.

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1 **FOURTH CLAIM FOR RELIEF**

2 ***Monell Claim (42 U.S.C. § 1983)***

3 **(Against Defendants CITY and COUNTY)**

4 63. Plaintiff re-alleges and incorporates herein by reference each and every
5 allegation and statement contained in paragraphs 19 through 33, as though fully set
6 forth herein.

7 64. Defendants CITY and COUNTY are and at all times herein mentioned have
8 been a public entity and incorporated municipality duly authorized and existing as
9 such in and under the laws of the State of California; and at all times herein
10 mentioned, Defendants CITY, COUNTY, and the VPD possessed the power and
11 authority to adopt polices and prescribe rules, regulations and practices affecting the
12 operation of the CITY, COUNTY, and of the VPD and its tactics, methods, practices,
13 customs and usages related to internal investigations, personnel supervision and
14 records maintenance and the proper application of their powers of arrest by its rank
15 and file, generally.

16 65. At all times herein mentioned, Defendants Responding Deputies, and each of
17 them, were employees of the VPD acting under the CITY's and COUNTY's direction
18 and control, who knowingly and intentionally promulgated, maintained, applied,
19 enforced and suffered the continuation of policies, customs, practices and usages in
20 violation of the Fourth and Fourteenth Amendments respectively to the United States
21 Constitution, which customs, policies, practices and usages at all times herein
22 mentioned encouraged the employment, deployment and retention of persons as peace
23 officers who have a propensity for failing to protect citizens in custody, failing to
24 provide safe conditions of confinement, dishonesty, cover-up, bias, and numerous
25 other serious abuses of their duties as peace officers in the employment of the VPD,
26 CITY, and COUNTY.

27 66. Defendants CITY and COUNTY knowingly maintain and permit official *sub-*
28 *rosa* policies or customs of permitting the occurrence of the kinds of wrongs set forth

1 above, by deliberate indifference to widespread police abuses, failing and refusing to
2 fairly and impartially investigate, discipline or prosecute officers who commit acts of
3 failing to protect citizens in custody, failing to provide safe conditions of confinement,
4 dishonesty, cover-up, bias, and crimes under color of law, each ratified and approved
5 by the VPD.

6 67. On and for some time prior to July 2, 2019 (and continuing to the present
7 date), Defendants CITY and COUNTY, deprived Decedent and Plaintiff of the rights
8 and liberties secured to them by the Fourth and Fourteenth Amendments to the United
9 States Constitution, in that said defendants and their supervising and managerial
10 employees, agents, and representatives, acting with gross negligence and with reckless
11 and deliberate indifference to the rights and liberties of the public in general, of
12 Decedent and Plaintiff, and of persons in their class, situation and comparable position
13 in particular, knowingly maintained, enforced and applied an official recognized
14 CITY and COUNTY custom, policy, and practice of, or ratified, directed, encouraged,
15 and/or allowed the following:

16 (a) Defendants CITY and COUNTY had knowledge, prior to and since this
17 incident, of repeated allegations of misconduct toward detainees and
18 arrestees; specifically, CITY and COUNTY knew Defendants
19 Responding Deputies, and each of them, had in the past and since
20 Decedent's incident, committed similar acts of failing to protect citizens
21 in custody, failing to provide safe conditions of confinement, falsifying
22 reports, suppressing evidence, and dishonesty, thereby enabling
23 Defendants to continue to violate the constitutional rights of the Decedent
24 and Plaintiff in 2019 and thereafter;

25 (b) Defendants CITY and COUNTY had knowledge, prior to and since this
26 incident, of similar allegations of failing to protect citizens in custody,
27 failing to provide safe conditions of confinement, falsifying reports,
28 suppressing evidence, and dishonesty by Defendants, and refused to

1 enforce established administrative procedures to insure the rights of
2 detainees and arrestees;

3 (c) Defendants CITY, COUNTY, and VPD refused to adequately discipline
4 individual officers and employees found to have committed similar acts
5 of failing to protect citizens in custody, failing to provide safe conditions
6 of confinement, and misconduct;

7 (d) Defendants CITY, COUNTY, and VPD refused to competently and
8 impartially investigate allegations of failing to protect citizens in custody,
9 failing to provide safe conditions of confinement, and misconduct alleged
10 to have been committed by Department employees;

11 (e) Defendants CITY, COUNTY, and VPD reprimanded, threatened,
12 intimidated, demoted and fired officers who courageously reported
13 unlawful acts by other officers;

14 (f) Defendants CITY, COUNTY, and VPD covered up acts of misconduct
15 and abuse by CITY and COUNTY officers and sanctioned a code of
16 silence by and among officers and management;

17 (g) Defendants CITY, COUNTY, and VPD knew of and sanctioned the
18 custom and practice of failing to protect citizens in custody, failing to
19 provide safe conditions of confinement, and misconduct;

20 (h) Defendants CITY, COUNTY, and VPD failed to adequately supervise
21 the actions of officers under their control and guidance;

22 (i) Defendants CITY, COUNTY, and VPD historically condone and
23 encourage systemic conspiracy of silence among its employees for the
24 purpose of concealing and further wrongful and illegal conduct by its
25 employees; and,

26 (j) Defendants CITY, COUNTY, and VPD fostered and encouraged an
27 atmosphere of lawlessness, abuse and misconduct, which by July 2, 2019,
28

1 and thereafter, represented the unconstitutional policies practices and
2 customs of the CITY, COUNTY, and VPD.

3 68. By reason and pursuant to the aforesaid policies, practices, customs, and
4 usages of Defendants CITY, COUNTY, and the VPD, the Decedent sustained general
5 damages, including pre-death pain and suffering, and loss of enjoyment of life and
6 other hedonic damages in an amount according to proof at trial, and Plaintiff has
7 sustained substantial non-economic damages of pain and suffering and emotional
8 distress resulting from the loss of the love, companionship, comfort, affection, society,
9 attention, services, and moral support damages of this Decedent in an amount
10 according to proof at trial.

11 69. Defendants CITY, COUNTY, and the VPD, together with various other
12 officials, whether named or unnamed, had either actual or constructive knowledge of
13 the deficient policies, practices and customs alleged in the paragraphs above. Despite
14 having knowledge as stated above these defendants condoned, tolerated and through
15 actions and inactions thereby ratified such policies. Said defendants also acted with
16 deliberate indifference to the foreseeable effects and consequences of these policies
17 with respect to the constitutional rights of Decedent and Plaintiff, and other
18 individuals similarly situated.

19 70. By perpetrating, sanctioning, tolerating and ratifying the outrageous conduct
20 and other wrongful acts, Defendants CITY, COUNTY, and VPD acted with an
21 intentional, reckless, and callous disregard for the well being of Decedent and Plaintiff
22 and their constitutional as well as human rights. Defendants CITY, COUNTY, and
23 VPD and each of their actions were willful, wanton, oppressive, malicious, fraudulent,
24 and extremely offensive and unconscionable to any person of normal sensibilities.

25 71. Furthermore, the policies, practices, and customs implemented and maintained
26 and still tolerated by Defendants CITY, COUNTY, and the VPD were affirmatively
27 linked to and were a significantly influential force and moving force behind
28 Decedent's death and Plaintiff's damages.

1 72. By reason of the aforesaid policies, customs, practices and usages, Decedent's
2 Fourth and Fourteenth Amendments to the United States Constitution were violated
3 along with Plaintiff's Fourteenth Amendment rights. Said customs, policies, practices
4 and usages at all times herein mentioned violated constitutional rights including those
5 of Decedent and Plaintiff.

6 73. Accordingly, Defendant CITY is liable to Plaintiff for compensatory damages
7 under 42 U.S.C. § 1983.

8 **FIFTH CLAIM FOR RELIEF**

9 **Bane Act Violation (Cal. Civ. Code § 52.1)**

10 **(Against All Defendants save MILES KOWALSKI)**

11 74. Plaintiff re-alleges and incorporates herein by reference each and every
12 allegation and statement contained in paragraphs 19 through 73, as though fully set
13 forth herein.

14 75. The actions of all Defendants, save MILES KOWALSKI, as complained of
15 herein, interfered with, and/or attempted to interfere with, by use of threats,
16 intimidation, and/or coercion, the exercise or enjoyment by Decedent the rights
17 secured to him by the California Constitution and otherwise by California law, in
18 violation of California Civil Code § 52.1. Specifically, Defendants Responding
19 Deputies, and each of them, failed to protect Decedent while in custody and failed to
20 provide safe conditions of confinement of Decedent when said Defendants had a legal
21 obligation to do so. Defendants violated California Constitution Article 1, Sections 1
22 and 13 regarding Plaintiff's freedom, independence, liberty, obtaining safety and
23 happiness, and right to be free from an unreasonable seizure of his person.

24 76. Defendants Responding Deputies are liable to Plaintiff for said violations of
25 Decedent's constitutional rights, pursuant to California Civil Code § 52.1, and
26 California Government Code § 820(a), amongst other provisions.

27 77. Defendants CITY and COUNTY are liable to Plaintiff for said violations of
28 Decedent's constitutional and statutory rights, pursuant to California Civil Code §

1 52.1, and California Government Code §§ 815.2(a), 815.4, 820(a), amongst other
2 provisions.

3 78. As a direct and proximate result of the actions of Defendants, as complained
4 of herein, Decedent died, and Plaintiff has sustained substantial non-economic
5 damages of pain and suffering and emotional distress resulting from the loss of the
6 love, companionship, comfort, affection, society, attention, services, and moral
7 support damages of this Decedent in an amount according to proof at trial.

8 79. As a direct and proximate result of the foregoing, Plaintiff has damages as
9 recited above and demands and is entitled to, including, but not limited to, general,
10 special and punitive damages (except as to Defendants CITY and COUNTY for
11 punitive damages), treble compensatory damages, attorney's fees, and any other relief
12 allowable at law or in equity.

13 **SIXTH CLAIM FOR RELIEF**

14 **Negligence**

15 **(Against All Defendants save MILES KOWALSKI)**

16 80. Plaintiff re-alleges and incorporates herein by reference each and every
17 allegation and statement contained in paragraphs 19 through 79, as though fully set
18 forth herein.

19 81. By virtue of the foregoing, Defendants Responding Deputies, CITY,
20 COUNTY, and each of them, owed Decedent a duty of due care, and that duty was
21 breached by said Defendants' negligence and failure to exercise due care in dealing
22 with, detaining, arresting, failing to protect Decedent while in custody, and failing to
23 provide safe conditions of confinement for Decedent.

24 82. Defendants CITY and COUNTY possessed the power and authority to hire
25 and fire employees of the VPD and based upon information and belief and
26 negligently hired Defendants Responding Deputies, and each of them, as police
27 officers, and entrusted them with the following duties: protect citizens during
28

1 detainment and arrests, protect detainees and arrestees in custody, and provide safe
2 conditions of confinement of detainees and arrestees.

3 83. By virtue of the foregoing, Defendants CITY and COUNTY owed Decedent a
4 duty of due care, and that duty was breached by said Defendants' negligent and
5 careless manner in hiring, training, supervising and retaining by, among other things:

6 a) Failing to adequately train its officers in the detention, arrest, and
7 custody of citizens;

8 b) Failing to adequately train its officers to protect citizens in custody and
9 to provide safe conditions of confinement for citizens in custody;

10 c) Failing to adequately investigate background, training and experience as
11 a officer and his propensity for disobedience;

12 d) Failing to provide adequate supervisory control over the actions of its
13 officers in regard to adequate training, supervision, equipment, planning, oversight,
14 and administration;

15 e) Failing to control the conduct of its officers who have a known
16 propensity for disobedience and in failing to discipline its officers;

17 f) Failing to investigate in good faith, allegations of abuse and failing to
18 protect citizens in custody by its officers;

19 g) Failing to discipline its officers who improperly fail to protect and to
20 provide safe conditions of confinement during custody of citizens; and,

21 h) Sanctioning, condoning and approving a law enforcement-wide custom
22 and practice of a code of silence, cover-up and dishonesty.

23 84. Defendants Responding Deputies are liable to Plaintiff for said negligence
24 pursuant to California Government Code § 820(a), amongst other provisions.

25 85. Defendants CITY and COUNTY are liable to Plaintiff for said negligence
26 pursuant to California Government Code §§ 815.2(a), 815.4, 820(a), amongst other
27 provisions.

28

1 86. As a direct and proximate result of the actions of Defendants, as complained
2 of herein, Decedent died, and Plaintiff has sustained substantial non-economic
3 damages of pain and suffering and emotional distress resulting from the loss of the
4 love, companionship, comfort, affection, society, attention, services, and moral
5 support damages of this Decedent in an amount according to proof at trial.

6 87. As a direct and proximate result of the foregoing, Plaintiff has damages as
7 recited above and demands and is entitled to, including, but not limited to, general,
8 special and punitive damages (except as to Defendants CITY and COUNTY for
9 punitive damages), and any other relief allowable at law or in equity.

10 **SEVENTH CLAIM FOR RELIEF**

11 **Violation of California's Public Records Act (Cal. Gov't Code §§ 6250, et seq.)**
12 **(Against Defendant MILES KOWALSKI)**

13 88. Plaintiff re-alleges and incorporates herein by reference each and every
14 allegation and statement contained in paragraphs 19 through 33, as though fully set
15 forth herein.

16 89. A California governmental entity has the duty to respond to a CPRA request
17 made by an individual of the public.

18 90. Plaintiff is a member of the public and is beneficially interested in the
19 outcome of these proceedings; he has a clear, present and substantial right to the relief
20 sought herein. Plaintiff has no plain, speedy and adequate remedy at law other than
21 that sought herein.

22 91. A member of the public who believes that public records are being improperly
23 withheld may bring suit for mandate to enforce the CPRA. (Gov't Code §§ 6258,
24 6259(a).) If the Court finds that the public official's decision to refuse disclosure is
25 not justified, it shall order the public official to make the records public. (*Id.* §
26 6259(b).)

27 92. Defendant MILES KOWALSKI's failure to provide a proper response to
28 Plaintiff's CPRA Requests and/or to produce responsive documents and names

1 violates the California Public Records Act, which provides that “[p]ublic records are
2 open to inspection at all times during the office hours of the state or local agency and
3 every person has a right to inspect any public record, except as hereafter provided.”
4 (Gov’t Code § 6253(a).)

5 93. Defendant MILES KOWALSKI has a legal obligation to make all public
6 records available for inspection by any member of the public upon request. Defendant
7 MILES KOWALSKI has not made a valid claim that any of the documents and
8 information sought are exempted from disclosure under proper statutory grounds for
9 withholding documents.

10 94. Defendant MILES KOWALSKKI has a policy and practice of not complying
11 with the CPRA.

12 95. As a result of Defendant MILES KOWALSKI’s violation of the CPRA,
13 Plaintiff is entitled to attorneys’ fees, costs, and equitable relief from the Court to
14 ensure compliance by Defendant MILES KOWALSKI with the CPRA.

15 **PRAYER FOR RELIEF**

16 WHEREFORE, Plaintiff requests entry of judgment in his favor and against
17 Defendants Responding Deputies, CITY, and COUNTY as follows:

- 18 1. For general, special, hedonic, and compensatory damages in the amount to be
19 proven at trial;
- 20 2. For punitive damages in an amount to be proven at trial (save against CITY and
21 COUNTY);
- 22 3. For interest;
- 23 4. For costs;
- 24 5. For reasonable costs of this suit and attorneys’ fees pursuant to 42 U.S.C. §
25 1988;
- 26 6. For attorneys’ fees pursuant to Civil Code §§ 52, 52.1;
- 27 7. Any civil penalties, including treble damages and a minimum of \$4,000.00; and,
28

1 8. For such further other relief as the Court may deem just, proper, and
2 appropriate.

3 AND WHEREFORE, Plaintiff requests entry of judgment in his favor and
4 against Defendant MILES KOWALSKI as follows:

- 5 1. For reasonable costs of this suit and attorneys' fees;
- 6 2. For equitable relief to ensure compliance with the CPRA; and,
- 7 3. For such further other relief as the Court may deem just, proper, and appropriate.

8 Date: October 6, 2020

THE LAW OFFICE OF KEVIN S. CONLOGUE

9

10

11

12

By:  _____

13

Kevin S. Conlogue

14

Attorney for Plaintiff

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CLIFTON PLEASANT, JR.

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DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury.

Date: October 6, 2020

THE LAW OFFICE OF KEVIN S. CONLOGUE

By:  _____

Kevin S. Conlogue
Attorney for Plaintiff
CLIFTON PLEASANT, JR.

DECLARATION OF CLIFTON PLEASANT, JR.

I, Clifton Pleasant, Jr., declare that if called as a witness, I could and would testify competently to the following, of my own personal knowledge:

1. Clifton Pleasant, Sr. ("Decedent") is deceased.
2. Decedent passed away on or about July 2, 2019, in County of San Bernardino, State of California.
3. No proceeding is now pending in California for administration of the Decedent's estate.
4. I am the Decedent's successor in interest (as defined in Section 377.11 of the California Code of Civil Procedure) and succeed to the Decedent's interest in the action or proceeding.
5. No other person has a superior right to commence the action or proceeding or to be substituted for the Decedent in the pending action or proceeding as I am Decedent's only issue.
6. Attached hereto as Exhibit 1 is a true and correct copy of Decedent's death certificate and is incorporated herein.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 1, 2020, at Lancaster, California.

By: 
Clifton Pleasant, Jr.

EXHIBIT 1

COUNTY OF SAN BERNARDINO

SAN BERNARDINO, CALIFORNIA

3052019152293

CERTIFICATE OF DEATH

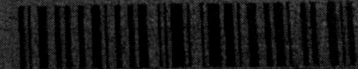
3201936008301

STATE FILE NUMBER 3052019152293		CERTIFICATE OF DEATH <small>STATE OF CALIFORNIA USE BLACK INK ONLY / REVISIONS, WHITTLED OR ALTERATIONS IN ANY WAY VOID</small>		LOCAL REGISTRATION NUMBER 3201936008301	
1. NAME OF DECEDENT - FIRST (Last)		2. MIDDLE		3. LAST (Family)	
CLIFTON		SAMUEL		PLEASANT	
4. DATE OF BIRTH mm/dd/yyyy		5. AGE Yrs.		6. SEX	
08/05/1970		48		M	
7. BIRTH STATE/PROVINCE/COUNTRY		8. EDUCATION - (highest level/degree)		9. HOURS - (24 hours)	
CALIFORNIA		HS GRADUATE		0339	
10. EVER IN U.S. ARMED FORCES?		11. MARITAL STATUS/DCP (as filed in Calif.)		12. DATE OF DEATH mm/dd/yyyy	
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK		DIVORCED		07/02/2019	
13. WAS DECEDENT HISPANIC/LATINO/A? (if yes, see instruction on back)		14. DECEDENT'S RACE - (Up to 3 races may be listed (see instruction on back))		15. YEARS IN OCCUPATION	
<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		AFRICAN AMERICAN		20	
16. USUAL OCCUPATION - Type of work for most of life. DO NOT USE RETIRED		17. KIND OF BUSINESS OR INDUSTRY (e.g., grocery store, road construction, employment agency, etc.)		18. YEARS IN OCCUPATION	
SMALL BUSINESS OWNER		FOOD MANUFACTURING		20	
19. DECEDENT'S RESIDENCE (Street and number or location)					
13801 PARAMOUNT BLVD APT 6210					
20. CITY		21. COUNTY/PROVINCE		22. ZIP CODE	
PARAMOUNT		LOS ANGELES		90723	
23. YEARS IN COUNTY		24. STATE/FOREIGN COUNTRY		25. INFORMANT'S MAILING ADDRESS (Street and number, or P.O. Box, and ZIP Code)	
38		CA		13801 PARAMOUNT BLVD APT 6210, PARAMOUNT, CA 90723	
26. INFORMANT'S NAME, RELATIONSHIP			27. INFORMANT'S MAILING ADDRESS (Street and number, or P.O. Box, and ZIP Code)		
BRENDA PLEASANT, MOTHER			13801 PARAMOUNT BLVD APT 6210, PARAMOUNT, CA 90723		
28. NAME OF SURVIVING SPOUSE/DCP - FIRST		29. MIDDLE		30. LAST (BIRTH NAME)	
-		-		-	
31. NAME OF FATHER/PARENT - FIRST		32. MIDDLE		33. LAST	
SAMUEL		CLIFTON		PLEASANT	
34. NAME OF MOTHER/PARENT - FIRST		35. MIDDLE		36. LAST (BIRTH NAME)	
BRENDA		LUCCILLE		PLEASANT	
37. BIRTH STATE		38. BIRTH STATE		39. BIRTH STATE	
CALIFORNIA		CALIFORNIA		CALIFORNIA	
40. DISPOSITION DATE mm/dd/yyyy		41. PLACE OF FINAL DISPOSITION			
08/06/2019		ROSE HILLS MEMORIAL PARK 3888 WORKMAN MILL RD, WHITTIER, CA 90601			
42. TYPE OF DISPOSITION		43. SIGNATURE OF EMBALMER		44. LICENSE NUMBER	
BU		JESSE GONZALES		EMB9512	
45. NAME OF FUNERAL ESTABLISHMENT		46. LICENSE NUMBER		47. SIGNATURE OF LOCAL REGISTRAR	
ROSE HILLS MORTUARY		FD970		MAXWELL OHIKHUARE, MD	
48. DATE mm/dd/yyyy		49. SIGNATURE OF LOCAL REGISTRAR		50. LICENSE NUMBER	
07/29/2019		MAXWELL OHIKHUARE, MD		EMB9512	
101. PLACE OF DEATH					
INTERSTATE					
102. IF HOSPITAL, SPECIFY ONE		103. IF OTHER THAN HOSPITAL, SPECIFY ONE			
<input type="checkbox"/> IP <input type="checkbox"/> EWOP <input type="checkbox"/> DCA <input type="checkbox"/> Hospice <input type="checkbox"/> Nursing Home/LTC <input type="checkbox"/> Skilled Care <input checked="" type="checkbox"/> Other					
104. COUNTY		105. FACILITY ADDRESS OR LOCATION WHERE FOUND (Street and number or location)		106. CITY	
SAN BERNARDINO		I-15, 31 MILES S/O ROY ROGERS DR. ON RAMP		VICTORVILLE	
107. CAUSE OF DEATH					
Enter the chain of events - diseases, injuries, or circumstances - that directly caused death. DO NOT enter terminal events such as cardiac arrest, respiratory arrest, or aneurysm rupture without showing the etiology. DO NOT ABBREVIATE.					
IMMEDIATE CAUSE (Final disease or condition resulting in death)					
A) MULTIPLE BLUNT FORCE INJURIES					
Secondary state and conditions, if any, leading to cause on Line A. Enter UNDERLYING CAUSE (underlying injury that initiated the events resulting in death) LAST					
108. DEATH REPORTED TO CORONER (Time Interval Between Death and Death)					
(A) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO					
109. BODY PERFORMED?					
(B) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					
110. AUTOPSY PERFORMED?					
(C) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO					
111. USED IN DETERMINING CAUSE?					
(D) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO					
112. OTHER SIGNIFICANT CONDITIONS CONTRIBUTING TO DEATH BUT NOT RESULTING IN THE UNDERLYING CAUSE GIVEN IN 107					
NONE					
113. WERE OPERATION PERFORMED FOR ANY CONDITION IN ITEM 107 OR 112? If yes, list type of operation and date.					
NO					
114. CERTIFY THAT TO THE BEST OF MY KNOWLEDGE DEATH OCCURRED AT THE HOUR, DATE AND PLACE STATED FROM THE CAUSES STATED.					
Decedent Absent/Seen Alive		Decedent Last Seen Alive		115. SIGNATURE AND TITLE OF CERTIFIER	
116. TYPE ATTENDING PHYSICIAN'S NAME, MAILING ADDRESS, ZIP CODE		117. LICENSE NUMBER		118. DATE mm/dd/yyyy	
119. CERTIFY THAT IN MY OPINION DEATH OCCURRED AT THE HOUR, DATE AND PLACE STATED FROM THE CAUSES STATED.					
MANNER OF DEATH		120. INJURED AT WORK?		121. INJURY DATE mm/dd/yyyy	
<input type="checkbox"/> Natural <input checked="" type="checkbox"/> Accident <input type="checkbox"/> Homicide <input type="checkbox"/> Suicide <input type="checkbox"/> Pending Investigation <input type="checkbox"/> Doubtful or Determined		<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> UNK		07/02/2019	
122. HOUR (24 hours)		123. PLACE OF INJURY (e.g., home, construction site, wooded area, etc.)		124. HOURS (24 hours)	
0339		INTERSTATE		0339	
125. DESCRIBE HOW INJURY OCCURRED (Event which resulted in injury)					
PEDESTRIAN STRUCK BY VEHICLE ON INTERSTATE					
126. LOCATION OF INJURY (Street and number or location, and city, and zip)					
INTERSTATE 15, 31 MILES S/O ROY ROGERS DRIVE ON RAMP VICTORVILLE, CA 92382					
127. SIGNATURE OF CORONER / DEPUTY CORONER		128. DATE mm/dd/yyyy		129. TYPE NAME, TITLE OF CORONER / DEPUTY CORONER	
PAMELA SOKOLIK-PUTNAM		07/25/2019		PAMELA SOKOLIK-PUTNAM, DEP CORONER	
STATE REGISTRAR		TAX AUTH.		CENSUS TRACT	
A B C D E		010001004267988			

CERTIFIED COPY OF VITAL RECORD
STATE OF CALIFORNIA, COUNTY OF SAN BERNARDINO

This is a true and exact reproduction of the document officially registered and placed on file in the OFFICE OF THE SAN BERNARDINO ASSESSOR-RECORDER-CLERK.

AUG 30 2019



002452951

P. Sokolik
DEPUTY CORONER

