



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

The following individuals submitted comments on agenda item:			
Agenda #	Relate To	Position	
Public Comment		Oppose	Name
			Comments
			<p>Probation Administration credibility is BANKRUPT! Probation LIED about staffing. Chief Probation Officer NOT at Board of Supervisor's Meeting. Probation LIED about programming. Probation LIED and said NO NEGATIVE IMPACT when field officers were deployed. Probation Officers were sent home WITHOUT PAY who CAN perform their assigned positions. Probation LIED about assault on officers.</p> <p>Lisa Southwell from BSCC, Commissioner Kalani & Chair Mundo from POC, LACOE, CBO's have ALL stated that Los Padrinos juvenile hall is a TOXIC and HOSTILE environment. I say this out of LOVE - I would rather see my fellow officers transferred than DEAD! Los Padrinos should be closed FORTHWITH. Whoever thought of REIMAGINE LA should be housing the minors/adults in our care.</p> <p>Los Angeles County Probation has STOLEN \$549,170.04 from minors/adults in their care. Probation LIED and said probation officers are working to return the money. The TRUTH is that probation officers are in the halls to increase the number of officers to PASS the upcoming BSCC inspection.</p> <p>It is DIFFICULT to believe that Robert Smythe, a USC professor, Administrative Manager for Probation and former employee in the Auditor-Controller's office REFUSES to return the money to it's rightful owner. There is a directive to take the money from the minor/adult when they enter juvenile hall. However, there is NO directive to return the money when the minor/adult is released. It would be EASY to make returning the money through the IDC release process. When said person is released the money should be returned.</p>
			CORNELIUS A PETTUS
			CLOSE LOS PADRINOS DUE TO TOXIC AND HOSTILE ENVIRONMENT
			Gabriel Quiroz Jr
			Jordan Pena
			I oppose this project in our community. We already have great public schools. Creating yet another charter school continues to privatize education which removes vital resources that can be used for our local education. Furthermore, This will cause traffic, noise, pollution and lack of parking, in our quiet residential ELA community!! No more charter schools in ELA! Please vote NO on Item 7.



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
Public Comment		Oppose	Larry Reed	"HALT the development plans for 220 residential units on the corner of Marine and Crenshaw in El Camino Village (unincorporated LA County) until further studies have been conducted to assess the impacts the development will have on public health and safety, traffic congestion, street parking, local education, and single home property values. epicla.lacounty.gov/energov_prod/SelfService/#!/plan/0fbc9028-d629-45b4-8c3a-c05e3755df02?tab=attachments - Permit # RPPL2024002390 - Project # PRJ2024-001599 - ADMINISTRATIVE HOUSING PERMIT # RPPL2024002389"
			Lloyd E Carder II	
			Luna I Rose	I oppose the potential construction of a new Charter School due to the negative impacts it'll have on our environment and local community specifically in regards to pollution that will be emitted by the demolition of the old church and the pollution by the pouring of cement that will pollute the ground dirt that will render it unusable.



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
Public Comment		Other	ALISON H FAIRCHILD	<p>The Board of Supervisors needs to command its County of Los Angeles Treasurer and Tax Collector agency to immediately launch investigations and swiftly inspect and shut down the following residential properties located in the unincorporated areas of the County of Los Angeles, for which all properties are willfully, knowingly, carelessly, and recklessly violating this County of Los Angeles Board of Supervisors passed ordinances for STR listings:</p> <p>1. 2308 Felicia Avenue, Rowlands Heights, CA 91748. This property is owned by Chen Property RH LLC and Jiaxin Xin Chen. The Airbnb host, Zou Yao Qiong, is a renter at the property. Airbnb platform listing information for the property proves by clear and convincing evidence that this property is out of compliance with the County of Los Angeles STR ordinance that prohibits homeowners and renters from listing their home on STR websites for longer than 90 days in a calendar year. Property owners of 2308 Felicia Avenue have now rented out two separate rooms in the home on Airbnb and booked rooms on Airbnb for a minimum of 250 days out of the calendar year 2024. Additionally, property owners at 2308 Felicia Avenue have recklessly failed to immediately pay the \$ 914.00 registration fee that was due on October 7, 2024.</p> <p>2. 9624 East Naomi Avenue, Arcadia, CA 91007. This property is owned by Zhang Yuhang. The Airbnb host, Felicia Chan, is a renter at the property. Airbnb platform listing information for the property proves by clear and convincing evidence that this property is out of compliance with the County of Los Angeles STR ordinance that prohibits homeowners and renters from listing their home on STR websites for longer than 90 days in a calendar year. The property owner of 9624 Naomi Avenue has now rented out two separate rooms in the home on Airbnb and booked rooms on Airbnb for a minimum of 250 days out of the calendar year 2024. Additionally, property owners at 9624 East Naomi Avenue have recklessly failed to immediately pay the \$ 914.00 registration fee that was due on October 7, 2024.</p> <p>THE ABOVE-STATED ILLEGAL STR PROPERTIES MUST BE IMMEDIATELY SHUT DOWN!</p>
			AROGANT HOLLYWOOD	YOU RESENTENCING STONE-COLD MURDERS MENRDEZ BROTHERS. YOU NEED TO FOCUS ON OVERTURNING THE WRONGFUL CONVICTING OF AROGANT HOLLYWOOD AND TURNING OVER PHONY LASD-CREATED GOPRO VIDEO RECORDINGS.
			Carly Morris	



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments
Public Comment		Other	Jane Doe	<p>Chief Viera Rosa should be relieved of his duties. Our department needs new leadership urgently. The chief has destroyed our department. There are hundreds of Deputy Probation Officers sitting at home, as they have been forced to take a leave of absence from their field positions because the department refuses to offer them simple work accommodations, thus violating ADA. These officers are perfectly capable of doing the jobs they were doing before the chief decided to stop accommodating them and sent them home. At the same time there are also hundreds of field officers being deployed to juvenile hall and working out of class due to staff shortages. So who is left in our Probation offices? No one, just the supervisors and clerical staff. The offices are practically empty during the day and being vandalized at night. The community is not safe, no one is being supervised, home visits are not being conducted and house arrest clients are not being monitored. Juveniles are not being supervised in the community including your vulnerable CSEC population. Adults including sex offenders, AB 109, domestic violence offenders and more are also not being supervised. Court reports are late and no one is in the office to see our clients when they need it most. It's only a matter of time before the community has to suffer from the poor choices that some of our clients make because their support system is no longer in the office as they have been sent home on a forced leave of absence or to work at LP now. Los Padrinos is out of control. There are no consequences for the minors actions and staff are getting injured left and right. Once they are injured, the workers compensation insurance company (Sedgwick) delays your claim or takes 3+ months to approve it. Even when there is video footage of the incident, they still deny claims or take forever to get you approved for medical services such as therapy or MRI's. This is all happening under Vierra Rosa's leadership due to the decisions that he has made. Morale is very low, the lowest I've ever seen, it is a toxic and hostile work environment. HR is not hiring fast enough to replace all of the people that are transferring, quitting or retiring. More people are retiring than ever before and you are losing a wealth of knowledge and experience, due to the terrible treatment of staff by your chief. This is not leadership, it's dictatorship. Our department would greatly benefit from a transformational leader that believes in servant leadership instead of the current leadership style of Viera Rosa.</p>



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments
Public Comment		Other	LaTonya Roebuck Townsend	<p>Good morning,</p> <p>I am a Deputy Probation Officer II Field, employed with probation for 33 years. Currently working within the Youth Development Services. This Bureau administrators Independent Living Program (ILP) benefits to foster youth who have existed the "system". Also, supervises Non-Minor Dependents who volunteer Re-Entry in Extended Foster Care under AB12 for transitional housing benefits.</p> <p>I am emailing to bring awareness to the BOS that our foster youth clients within this Bureau are struggling to receive services from their assigned DPO IIs due to mandatory deployment, and mandatory leave of absence "home accommodations". Many DPOIIs have medical restrictions and have been instructed to remain home (using their own time) until given a "modified assignment (MA)". This MA assignment is a 90day rotation. On 90 off 90 at home.</p> <p>In addition, there is a lot of confusing because of what and how the department (HR/cheif) is attempting to put PC 830.5 into place.</p> <p>I hope that the BOS is aware of the chiefs plans to make all deputies "full duty" with disregard of the Penal Code some were hired under. I really would like some clarity on this as it relates to PC 832 module I and II vs PC 830.5. Many of us have POST certificate that indicate successful completion of PC 832 not PC 830.5. I would like to know where/when it shows the change occurred for us to be forced into thi situation.</p> <p>I feel that the new "full duty" under PC 830.5 should not be forced onto those DPOIIs that are currently able to do their field assignments (with or without restrictions).</p> <p>I understand the shortage of staff in juvenile halls and the struggle the department is experiencing in keeping new hirees. However, this recent move to send field DPO IIs home, using our time, has/is causing a crisis for our clients in the community. Not to forget a financial hardship on us (DPO IIs Field) because our time accumulated will not last and people will/are at home with no pay.</p> <p>I appreciate your time and look forward to hearing back from you and getting clarity and your support for DPO IIs in the field that unfortunately have medication restrictions.</p>
		Item Total	12	

Grand Total			12	
-------------	--	--	----	--

As a Los Angeles County Probation Officer, I use Evidence Based Practices.

The Board of Supervisors have **EVIDENCE** that Probation is broken due to NO CONSEQUENCES for the minors/adults in our care. We reward BAD behavior.

The BSCC has **EVIDENCE** that Probation can NOT provide the BARE MINIMUM services to the minors/adults in our care. Los Padrinos has been out of compliance 71% of the time.

The Probation Oversight Commission has **EVIDENCE** that Probation LIED about programming and services. Probation claimed programming and services were rendered but video and Commission Kalani reported a different story.

The BOS, BSCC , POC, LACOE and Probation have **EVIDENCE** that SAFETY has NOT been addressed. Officers and teachers are working in a TOXIC and HOSTILE environment. It's an accident waiting to happen. How many officers, staff and minors have to endure this NIGHTMARE?

Los Padrinos is ONLY open because everyone is concerned about **LOSING THE MONEY** the minors/adults provide. There is BLATANT disregard for the safety of the officers! Who wants to go to work to be **ASSAULTED**?

I hereby recommend that Los Padrinos be CLOSED! I say this out of LOVE. I would rather my co-worker be transferred than DEAD.

AROGANT HOLLYWOOD, Esq.
1308 EAST COLORADO BLVD.

PASADENA, CA 91106

Mobile: 626.755.6442

aroganthollywoodgenius@gmail.com

OF HIS OWN COUNSEL

3-0 On Charged Felony Cases Maliciously Prosecuted

Spirit of Esquire



**UNITED STATES DISTRICT COURT
DISTRICT OF THE STATE OF CALIFORNIA
EASTERN DISTRICT OF CALIFORNIA
ROBERT T. MATSUI COURTHOUSE**

AROGANT HOLLYWOOD,

Case No.

Plaintiff,

vs.

**VERIFIED ORIGINAL CIVIL RIGHTS
COMPLAINT**

jeffrey a macomber, jason d. johnson, jennifer barretto, tammatha foss, christopher chambers,
ronald broomfield, jennifer benavidez, gavin christopher newsom, robert andres bonta, peter
dwight halloran, dennis l. beck jr., leah tamu wilson, sai srinivasan, ashley albiento, bryce miller,
elizabeth byers, leo ka fong lo, george gascon, cheryl lynn kaylor, ying chun chen & DOES 1-10

Defendant(s),

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

1 **VERIFIED ORIGINAL CIVIL RIGHTS COMPLAINT FOR INJUNCTIVE RELIEF,**
2 **DECLARATORY RELIEF, GENERAL DAMAGES, COMPENSATORY DAMAGES,**
3 **SPECIAL DAMAGES & PUNITIVE DAMAGES FOR VIOLATION OF 42 U.S.C. §§**
4 **1983 & 1985, U.S.C.A. CONST. AMEND. XIV, FRAUD, NEGLIGENCE PER SE,**
5 **GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED.**

6
7 **Plaintiff AROGANT HOLLYWOOD, for his original civil rights complaint,**
8 **through himself, by himself, on behalf of himself, and acting in federal pro-se litigation,**
9 **upon information and belief, respectfully alleges as follows:**

10
11 **I. INTRODUCTION**

12 1. No man in this country is so high that he is above the law. No officer of the law may
13 set that law at defiance with impunity. All of the officers of the government, from the highest to
14 the lowest, are creatures of the law and are bound to obey it. It is the only supreme power in our
15 system of government, and every man who by accepting office participates in its functions is
16 only the more strongly bound to submit to the supremacy and to observe the limitations which it
17 imposes upon the exercise of the authority which it gives. *United States v. Lee*, 106 U.S. 196, 1
18 S. Ct. 240, 27 L.Ed. 171 (1882) at 220

19
20 2. Defendants violated state and federal laws by committing reckless *under color of law*
21 *fraud, reckless under color of law deceit, reckless under color of law fraud upon the court,*
22 *and reckless under color of law neglect to their duty to assist and aid Plaintiff Arogant*
23 *Hollywood with and to overturn his wrongful felony conviction* even after they were all timely
24 and previously served a cease-and-desist letter on numerous occasions, sent numerous emails,
25 facsimiles, received notification and fair notice by United Postal Service first class mail, and
26 were all given **FAIR NOTICE** through Plaintiff Arogant Hollywood's numerous telephone
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,**
Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42
U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42
U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE
PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

calls to Defendants. Defendant Cheryl Lynn Kaylor was personally served a cease-and-desist letter not once but a total of three times on three separate occasions. Prior to Defendant Ying Chun Chen willfully, recklessly, knowingly, carelessly, wantonly, maliciously, and callously conspired with CDCR peace officers, and CDCR Defendants sued herein to violate Plaintiff Arogant Hollywood's constitutional civil rights recklessly. As the evidence of this original civil rights complaint will show through its statement of facts, Defendant George Gascon and his corrupt deputy district attorneys knew nearly from the very beginning of unconstitutional criminal case GA114055 that Plaintiff AROGANT HOLLYWOOD was innocent and had never made any criminal threats to lying and mentally disabled California state government witness Jennifer Hutton-Heger. For example, the facts and allegations will state that Arogant Hollywood made telephone calls to both the County of Los Angeles District Attorney's Office-Alhambra Field Office and the County of Los Angeles Office of Inspector General on February 21, 2023 (just three hours after his false arrest) stating that the had evidence on his GoPro camera and Samsung Galaxy S21 Ultra that he was innocent, and complaining that arresting peace officers and peace officers in command at the County of Los Angeles Temple City substation were refusing to give him access to his GoPro camera and Samsung Galaxy S21 mobile phone so he could show these peace officers evidence that he did not make a criminal threat and be released. Plaintiff Arogant Hollywood's February 21, 2023, GTL phone records to these County of Los Angeles public entities will be subpoenaed in this original civil rights complaint lawsuit. Instead of Defendant George Gascon using the information stated in Arogant Hollywood's February 21, 2024 GTL powered inmate telephone calls to exonerate Arogant. George Gascon and his co-conspirators recklessly used the information and statements of Arogant Hollywood to frame him by manipulating his GoPro video recordings, allow a corrupt and rogue County of Los Angeles peace officer to fabricate lies regarding two very important 911 audio recordings, and disposing of Arogant Hollywood's Samsung Galaxy S21 Ultra smart mobile phone which contained on it entirely exculpatory audio and text message evidence that was created on

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

February 21, 2023.

3. This is an original constitutional civil rights 42 U.S.C. § 1983 civil rights complaint that seeks to establish the reckless, wanton, willful, deliberate, malicious, and callous actions of Defendants Jeffrey D. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Peter Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Sai Srinivasan, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascon, Cheryl Lynn Kaylor, Ying Chun Chen, & DOES 1-10 recklessly violated Plaintiff Arogant Hollywood's United States constitutional civil rights. Plaintiff Arogant Hollywood's original civil rights complaint seeks to effect change through punitive damages by punishing Defendants Jeffrey D. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Peter Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Sai Srinivasan, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascon, Cheryl Lynn Kaylor, Ying Chun Chen, & DOES 1-10 for their egregious conduct with the hope that the punishment is significant enough to prevent Defendants from violating federal and state laws in the future that were so extreme that it resulted in a Plaintiff Arogant Hollywood being falsely arrested, maliciously prosecuted for nearly two years without any probable cause, being sent to prison based on fabricated and local state government created evidence, and being wrongfully incarcerated for twenty of the past twenty-five months (February 21, 2023 until October 17, 2023, December 12, 2023 until April 17, 2024, July 11, 2024 until August 30, 2024, September 5, 2024 until September 7, 2024, & September 12, 2024 until September 18, 2024) that was wholly aided and abetted by reckless under color of law fraud, deceit, wrongfully incarceration, and under color of law malicious prosecution without probable cause. The reckless under color of law fraud and the reckless under color of law deceit actions and illegal acts done by Defendants Cheryl Lynn

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

1 Kaylor and Ying Chun Chen resulted in Plaintiff Arogant Hollywood being deprived of real
2 property without due process of law, in direct violation of the Fourteenth Amendment of the
3 United States Constitution.

4
5 4. All other named and unnamed Defendants acted under the color of law by working very
6 closely with the County of Los Angeles local government and State of California elected
7 officials, directors, and peace officers to recklessly violate the United States constitutional civil
8 rights of Plaintiff Arogant Hollywood.

9 10 **II. STATUTE OF LIMITATIONS**

11
12 5. Plaintiff Arogant Hollywood brought this original civil rights complaint before this
13 Eastern District United States Court before the expiration of Arogant Hollywood's statute of
14 limitations expiration of April 17, 2026. Plaintiff Arogant Hollywood will allege numerous
15 factual allegations that occurred between February 21, 2023, and October 16, 2024.

16 17 **III. PRELIMINARY STATEMENT**

18
19 6. This is an original constitutional civil rights action in which Plaintiff **AROGANT**
20 **HOLLYWOOD [hereinafter "KING AROGANT" or Plaintiff]** seeks damages to redress
21 the under color of law deprivation of constitutional civil rights secured to Plaintiff under the
22 Fourth & Fourteenth Amendment of the United States Constitution, 42 U.S.C. § 1983, 42 U.S.C.
23 § 1985, and 42 U.S.C. § 1986.

24
25 7. The prosecutorial misconduct associated with the "*Arogant Hollywood*" matter was not
26 comprised of mistakes on the periphery. It was not the consequence of episodic errors of
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

1 judgment. Instead, it was systematic, pervasive, and purposeful, with each illegal act aimed at
2 affecting the administration of justice through the use of a thoroughly reckless, willful,
3 malicious, careless, wanton, callous and corrupt felony criminal investigation designed to frame
4 KING AROGANT through the use of peace officer wholly fabricated testimony, disposal of
5 KING AROGANT'S Samsung Galaxy S21 smart mobile phone, the presentation of false and
6 misleading LASD-created GoPro video recordings, lying judicial officers, a phony and forged
7 Superior Court of California, County of Los Angeles search warrant, a phony and forged
8 Superior Court of California, County of Los Angeles probable cause determination
9 (declaration), altered police 911 audio recordings, and the list goes on and on. As the
10 Defendants' reckless misconduct marched towards its payoff, both County of Los Angeles
11 Sheriff's Department peace officers and investigators and County of Los Angeles criminal
12 prosecutors were more than willing to carry and place their deceptions deep within the
13 machinery of the Superior Court of California judicial system's legal processes. The
14 Defendants' numerous deceptions were not minor. They began at the very heart of the frivolous
15 Superior Court of California, County of Los Angeles criminal case GA114055 that was
16 recklessly filed against KING AROGANT, and then moved outward from there, rippling into a
17 tainted pond ultimately touching every aspect of frivolous and unconstitutional Superior Court
18 of California, County of Los Angeles case GA114055. Entrenched with their greed for
19 deception, deceit, and corruption. Defendants Jeffrey D. Macomber, Jason D. Johnson, Jennifer
20 Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez,
21 Gavin Christopher Newsom, Robert Andres Bonta, Peter Halloran, Dennis L. Beck Jr., Leah
22 Tamu Wilson, Sai Srinivasan, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo,
23 George Gascon, Cheryl Lynn Kaylor, Ying Chun Chen, & DOES 1-10 were not satisfied that
24 they had successfully framed KING AROGANT for a violent and serious crime he did not
25 commit. Defendants were not satisfied that they recklessly sent an innocent 45 years-old black
26 man to one of the most violent and dangerous state prison systems in the United States (# 8

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

1 **Pelican Bay State Prison, # 5 San Quentin Prison, & # 4 Folsom State Prison, respectably**
2 **ranked in the top ten of United States' most dangerous and violent prisons).** After KING
3 AROGANTsent clear and convincing evidence directly to Defendants Jeffrey D. Macomber.
4 Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald
5 Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Peter
6 Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, George Gascon, and DOES 1-10 that he was
7 wrongfully sentenced to California state prison based on the recklessly false and fabricated court
8 testimony of lying and racist State of California government witness Thomas Leo Guzman-
9 Sanchez. Defendants ignored the evidence that was electronically served upon them and
10 continued to wrongfully and recklessly keep an innocent man on California state felony parole
11 as if he never served them clear and convincing evidence that he did nothing wrong to be sent to
12 state prison on February 2, 2024.

13 14 15 **IV. TIMELY SERVED CEASE-AND-DESIST-LETTER**

16
17 8. Defendants Jeffrey D. Macomber. Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
18 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
19 Robert Andres Bonta, Peter Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, George Gascon,
20 and DOES 1-10 all received FAIR NOTICE by way of a timely served Cease-and-Desist letter
21 that was served upon them in June 2024, August 2024, and finally in October 2024. See now
22 **Appendix of Exhibits, Exhibit 1.** Even after being served Plaintiff's Cease-and-Desist letter,
23 Defendants continued to willfully, recklessly, maliciously, wantonly, and callously violate
24 Arogant Hollywood's constitutional civil rights while they were all mostly acting under the
25 color of law. The Plaintiff's Cease-and-Desist letter was served upon Defendant George Gascon
26 by the United States Postal Service Certified Mail Receipt. Defendant Cheryl Lynn Kaylor was
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

1 personally served a cease-and-desist letter on multiple occasions by not only Arogant
2 Hollywood but also by way of a California-licensed process server. Defendant Ying Chun Chen
3 was personally served a cease-and-desist letter on July 10, 024, just one day prior to her illegal
4 and unconstitutional behavior. Defendants Jeffrey D. Macomber. Jason D. Johnson, Jennifer
5 Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez,
6 Gavin Christopher Newsom, Robert Andres Bonta, Peter Halloran, Dennis L. Beck Jr., Leah
7 Tamu Wilson, Sai Srinivasan, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo,
8 George Gascon, and DOES 1-10 were all commanded by electronic mail to cease-and-desist
9 recklessly violating KING AROGANT's constitutional civil rights. See the declaration of
10 AROGANT HOLLYWOOD in support of the timely cease-and-desist letter served upon all
11 named Defendants during various times and different times.

12 13 14 **V. DEFENDANTS RECEIVED FAIR NOTICE**

15
16 9. Pursuant to served Cease-and-Desist Letter. All named Defendants and DOES 1-10
17 received **FAIR NOTICE** by electronic mail or in person that they were willfully, recklessly,
18 Knowingly, maliciously, carelessly, wantonly, and callously violating Plaintiff KING
19 AROGANT's constitutional civil rights.

20 21 **VI. JURISDICTION & VENUE**

22
23 10. This original civil rights action is brought pursuant to 42 U.S.C. §§ 1983, 1985, & 1986
24 to redress the under color of law deprivation of Plaintiff KING AROGANT's constitutional civil
25 rights as secured by the United States Constitution. This United States District Court for the
26 Eastern District of California has intradistrict assignment privileges over Defendants sixteen of
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

1 the twenty named federal district court Defendants. Plaintiff KING AROGANT's federal claims
2 and allegations are based on violations committed by numerous Defendants who reside and are
3 gainfully employed in Sacramento County, and nearly all of those Defendants transacted
4 business by being paid handsomely by the State of California regarding and relating to these
5 claims and allegations made against them while they were employed by State of California
6 public agencies headquartered in Sacramento County or were employed by GoPro and Axon
7 publicly traded companies while they were transacting business and gainfully employed from
8 and in Sacramento County, with the obvious exceptions being Los Angeles County Defendants
9 George Gascon, Cheryl Lynn Kaylor, Leo Ka Fong Lo, and Ying Chun Chen who all in turned
10 conspired with State of California employed Defendants residing and working in Sacramento
11 County to willfully, knowingly, recklessly, maliciously, wantonly, and callously deprive
12 Arogant Hollywood of his constitutional civil rights while they were all recklessly bathed,
13 clothed, draped, and covered in and under the color of law.

14
15 11. This Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343.

16
17 12. This Court has supplemental jurisdiction under 28 U.S.C. § 1367(a).

18
19 13. Declaratory and injunctive relief are authorized by 28 U.S.C. §§ 2201, 2202, and 1343.

20
21 14. Venue is proper under 28 U.S.C. § 1391(b)(1) because Defendants Jeffrey D. Macomber.
22 Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald
23 Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Peter
24 Halloran, Dennis L. Beck Jr., Sai Srinivasan, Ashley Albiento, Bryce Miller, Elizabeth Byers all
25 reside in this United States Eastern District of California judicial district, and the remaining
26 Defendants George Gascon, Cheryl Lynn Kaylor, Leo Ka Fong Lo, and Ying Chun Chen

27
28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

are all residents of the state of California.

15. Personal jurisdiction is proper against all Defendants because they are either domiciled in California or have regularly transacted business in the state or are gainfully employed in California.

16. This is an original constitutional civil rights action for general damages, compensatory damages, punitive damages, special damages, injunctive relief, and declaratory relief under 42 U.S.C. § 1983 based upon under color of law willful, knowing, reckless, wanton, malicious, careless, and callous violations of the Search and Seizure Clause of the Fourth Amendment of the United States Constitution, and the Dure Process Clause of the Fourteenth Amendment of the United States Constitution.

17. This is an original constitutional civil rights action for general damages, compensatory damages, punitive damages, special damages, injunctive relief, and declaratory relief under 42 U.S.C. §§ 1985 & 1986 based upon under color of law willful, knowing, reckless, wanton, malicious, careless, and callous violations of the Search and Seizure Clause of the Fourth Amendment of the United States Constitution, and the Dure Process Clause of the Fourteenth Amendment of the United States Constitution.

VII. JURY TRIAL DEMAND AND CIVIL RIGHTS COMPLAINT OF AROGANT HOLLYWOOD

18. **PLAINTIFF AROGANT HOLLYWOOD** individually brings this original constitutional civil rights action against Defendants Jeffrey D. Macomber. Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Peter Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Sai Srinivasan, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascon, Cheryl Lynn Kaylor, Ying Chun Chen, & DOES 1-10. Plaintiff KING AROGANT HEREBY ALLEGES AS SET FORTH BELOW:

VIII. SUBJECT MATTER JURISDICTION & ARTICLE III STANDING TO BRING FORTH THIS LAWSUIT

19. To establish standings to maintain an action in federal district court, a plaintiff must allege: (1) injury in fact, (2) causation----“a fairly traceable connection between the plaintiff’s harm and the complained of conduct of the defendant”, and------(3) redressability ----- “a likelihood that the requested relief will redress the alleged injury.” See *Steel Co. v. Citizens for a Better Environment*, 523 U.S. 83, 118 S.Ct. 1003, 140 L.Ed.2d 210 (1998); *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 112 S.Ct. 2130, 119 L.Ed.2d 351 (1992)

20. The Supreme Court has explained that “the irreducible constitutional minimum’ of standing consists of three elements.” See *Spokeo Inc. v. Robins*, 578 U.S. 330, 136 S.Ct. 1540, 194 L.Ed.2d 635 (2016) (*quoting Lujan*, 504 U.S. at 560). A plaintiff “must have (1) suffered an injury in fact, (2) that is fairly traceable to the challenged conduct of a defendant, and (3) that is likely to be redressed by a favorable judicial decision.

21. Plaintiff Arogant Hollywood has alleged that Defendants willfully, knowingly, recklessly, wantonly, carelessly, maliciously, and callously violated his constitutional civil rights under color law. Plaintiff Arogant Hollywood has alleged that all Defendants’ willful, knowing, reckless, wanton, careless, malicious, and callous illegal actions of violating his

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

1 constitutional civil rights under color law resulted in KING AROGANT suffering from
2 including but not limited to damages for without limitation, embarrassment, humiliation,
3 anxiety, wrongful incarceration, wrongful conviction, depression, a complete disruption of life,
4 post-traumatic stress disorder, physical pain and suffering and emotional pain and suffering,
5 insomnia, chest pain, inconvenience, heart palpitations, migraines, stomachs, frustration,
6 mental anguish, emotional distress, loss of enjoyment of life, loss of constitutional civil rights,
7 loss of real property, deprivation and loss of liberty and deprivation of constitutional rights, and
8 other pain and suffering. Plaintiff KING AROGANT has filed this original constitutional civil
9 rights complaint on his behalf to redress civil rights violations by all Defendants.

10
11 22. Plaintiff KING AROGANT alleges that Defendants, some of Defendants' employees, and
12 some of Defendants' management willfully, knowingly, recklessly, wantonly, maliciously,
13 carelessly, and callously violated Plaintiff KING AROGANT's IV & XIV United States
14 constitutional civil rights. Plaintiff Fairchild asserts that Defendants' willful, reckless, knowing,
15 malicious, wanton, and callous violations of U.S.C. §§ 1983, 1985, & 1986 resulted in
16 Defendants reckless disrespect and disregard for KING AROGANT's constitutional civil rights,
17 were a reckless violation of the United States Constitution and a violation of federal law.

18
19 23. Plaintiff KING AROGANT alleges that the non-peace officer and the state of California
20 employed Defendants have conspired to interfere with KING AROGANT's United States
21 constitutional 4th and 14th Amendment constitutional civil rights by conspiring with the State of
22 California Defendants to harm and cause injury to KING AROGANT recklessly.

23
24 24. Plaintiff hereby alleges that Defendants violated KING AROGANT's constitutional 4th &
25 14th Amendment rights by willfully, knowingly, wantonly, recklessly, maliciously, and
26 callously committing under color of law fraud, under color of law fraud upon the court, and
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

under color of law deceit, and Plaintiff KING AROGANT has alleged numerous other federal and state violations including but not limited to 42 U.S.C. §§ 1983, 1985, & 1986.

IX. PARTIES

25. Plaintiff **AROGANT HOLLYWOOD** (hereinafter “**KING AROGANT**” or “**Plaintiff**”) is currently a homeless and transient resident of California and Los Angeles County. At the time of the filing of this original constitutional civil rights complaint, Plaintiff KING AROGANT was homeless in or around the cities of San Marino, Pasadena, South Pasadena, and Arcadia. At all relevant times stated throughout this original federal civil rights complaint, Plaintiff KING AROGANT was a part owner of real property located at 13732 Runnymede Street, Van Nuys, CA 91405, and only became homeless after being forced to leave based on the under the color of law fraud and under color of law deceit done to him willfully, knowingly, wantonly, recklessly, maliciously, and callously by Defendant Cheryl Lynn Kaylor. At all relevant times stated throughout this original federal civil rights complaint, Plaintiff KING AROGANT was an established residential tenant of real property located at 541 Bruin Drive, Riverside, CA 92507, and only became homeless after being forced to leave based on the under color of law fraud, and under color law deceit done to him willfully, knowingly, wantonly, recklessly, maliciously, and callously by Defendant Ying Chun Chen.

26. At all times relevant hereto and stated throughout this original constitutional civil rights complaint, Plaintiff **KING HOLLYWOOD** was an individual over 18 years old, a resident of the state of California, and a citizen of the United States of America.

27. Plaintiff **KING AROGANT** is a part owner of real property located at 13732 Runnymede Street, Van Nuys, CA 91405 that was in peaceful possession of said real property

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

until Defendant Cheryl Lynn Kaylor's willful, knowing, reckless, careless, wanton, malicious, and callus under color of fraud and under color of law deceit resulted in **KING AROGANT** being forced to leave a home that he was peacefully in possession of prior to April 17, 2024. Defendant Cheryl Lynn Kaylor used the assistance of CDCR peace officers to remove KING AROGANT from his home recklessly.

28. Plaintiff **KING AROGANT** was an established residential tenant of real property located at 541 Bruin Drive, Riverside, CA 92507, and he was in peaceful possession of said real property until Defendant Ying Chun Chen's willful, knowing, reckless, careless, wanton, malicious, and callus under color of fraud and under color of law deceit resulted in **KING AROGANT** being forced to leave a home that he was peacefully in possession of prior to April 17, 2024. Defendant Ying Chun Chen used the assistance of CDCR peace officers to remove KING AROGANT from his home recklessly.

29. Plaintiff **KING AROGANT** has an interest in this original constitutional civil rights action through his residential tenancy of Defendant Ying Chun Chen's property owned at 541 Bruin Drive, Riverside, CA 92507, his ownership of real property located at 13732 Runnymede Street, Van Nuys, CA 91405, and through and by the reckless illegal acts and actions done to KING AROGANT by all Defendants that was in direct violation of 42 U.S.C. § 1983, 42 U.S.C. § 1985, 42 U.S.C. § 1986, U.S.C.A. CONST. AMEND IV & XIV.

30. Plaintiff **KING AROGANT** is a proper and appropriate party to this original constitutional civil rights action through his residential tenancy at 541 Bruin Drive, Riverside, CA 92507, through his real property ownership of a house located at 13732 Runnymede Street, Van Nuys, CA 91405, and by and through all Defendants' reckless, wanton, malicious, callous, willful, and deliberate actions alleged herein and throughout this civil rights complaint that

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

interfered, invaded, infringed upon, and deprived **KING AROGANT** of his United States constitutional civil rights pursuant to 42 U.S.C. § 1983, 42 U.S.C. § 1985, 42 U.S.C. § 1986, the Search and Seizure Clause of the Fourth Amendment of the United States Constitution, the Due Process Clause of the Fourteenth Amendment of the United States Constitution, and the analogous provisions of California constitutional and statutory law. Plaintiff KING AROGANT seeks compensatory damages, general damages, special damages, and punitive damages for the individual Plaintiff KING AROGANT on his behalf and for himself only.

31. Defendant **JEFFREY A. MACOMBER (hereinafter “Macomber”)** is the governor-appointed Secretary of the California Department of Corrections and Rehabilitation (**hereinafter “CDCR”**) and all its many entities and subsidiaries. Defendant Jeffrey A. Macomber engaged in the reckless and wanton conduct complained upon herein while working in the course and scope of his employment with the California Department of Corrections and Rehabilitation. Defendant Macomber is at this moment sued in his official capacity as the governor-appointed Secretary and in his personal capacity as a citizen of the United States. Defendant Macomber acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Macomber intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Macomber resides in Sacramento County.

32. Defendant **JASON D. JOHNSON (hereinafter “Johnson” OR “Uncle Tom”)** is the governor-appointed Director of the California Department of Corrections and Rehabilitation's Division of Adult Parole Operations (**hereinafter after “DAPO”**) and all its many entities and subsidiaries. Defendant Uncle Tom engaged in the reckless and wanton conduct complained

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IED, & NEGLIGENT IED

upon herein while working in the course and scope of his employment with the California Department of Corrections and Rehabilitation. Defendant Uncle Tom is at this moment sued in his official capacity as the governor-appointed Director of the California Department of Corrections and Rehabilitation's Division of Adult Parole Operations and in his personal capacity as a citizen of the United States. Defendant Johnson acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Uncle Tom intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Uncle Tom resides in Sacramento County.

33. Defendant **JENNIFER L. BARRETTO (hereinafter "Barretto")** is the governor-appointed Undersecretary of Administration of the California Department of Corrections and Rehabilitation and all its many entities and subsidiaries. Defendant Barretto engaged in the reckless and wanton conduct complained upon herein while working in the course and scope of her employment with the California Department of Corrections and Rehabilitation. Defendant Barretto is at this moment sued in her official capacity as the governor-appointed Undersecretary of Administration of the California Department of Corrections and Rehabilitation and in her personal capacity as a citizen of the United States. Defendant Barretto acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Barretto intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Barretto resides in Sacramento

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

County.

34. Defendant **TAMMATHA FOSS (hereinafter “Foss”)** is the governor-appointed Undersecretary of Operations of the California Department of Corrections and Rehabilitation and all its many entities and subsidiaries. Defendant Foss engaged in the reckless and wanton conduct complained upon herein while working in the course and scope of her employment with the California Department of Corrections and Rehabilitation. Defendant Foss is at this moment sued in her official capacity as the governor-appointed Undersecretary of Operations of the California Department of Corrections and Rehabilitation and in her personal capacity as a citizen of the United States. Defendant Foss acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Foss intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Foss resides in Sacramento County.

35. Defendant **CHRISTOPHER CHAMBERS (hereinafter “Chambers”)** is the governor-appointed Director of Correctional Policy Research and Internal Oversight of the California Department of Corrections and Rehabilitation and all its many entities and subsidiaries. Defendant Chambers engaged in the reckless and wanton conduct complained upon herein while working in the course and scope of his employment with the California Department of Corrections and Rehabilitation. Defendant Chambers is at this moment sued in his official capacity as the governor-appointed Director of Correctional Policy Research and Internal Oversight of the California Department of Corrections and Rehabilitation and in his personal capacity as a citizen of the United States. Defendant Chambers acted under the color of law

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Chambers intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Chambers resides in Sacramento County.

36. Defendant **RONALD BROOMFIELD (hereinafter "Broomfield")** is the governor-appointed Director of Adult Institutions of the California Department of Corrections and Rehabilitation and all its many entities and subsidiaries. Defendant Broomfield engaged in the reckless and wanton conduct complained upon herein while working in the course and scope of his employment with the California Department of Corrections and Rehabilitation. Defendant Broomfield is at this moment sued in his official capacity as the governor-appointed Director of Adult Institutions of the California Department of Corrections and Rehabilitation and in his personal capacity as a citizen of the United States. Defendant Broomfield acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Broomfield intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Broomfield resides in Sacramento County.

37. Defendant **JENNIFER BENAVIDEZ (hereinafter "Benevidez")** is the governor-appointed Deputy Director of Facility Operation of the California Department of Corrections and Rehabilitation's Division of Adult Institutions and all its many entities and subsidiaries. Defendant Benevidez engaged in the reckless and wanton conduct complained upon herein

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

1 while working in the course and scope of her employment with the California Department of
2 Corrections and Rehabilitation. Defendant Benevidez is at this moment sued in her official
3 capacity as the governor-appointed Deputy Director of Facility Operation of the California
4 Department of Corrections and Rehabilitation's Division of Adult Institutions and in her
5 personal capacity as a citizen of the United States. Defendant Benevidez acted under the color of
6 law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous
7 indifference to KING AROGANT's federally protected civil rights. Defendant Benevidez
8 intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process
9 Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause
10 constitutional civil rights, and his California Constitution Article I, § 7 and California
11 Constitution Article I, § 26 civil rights. Defendant Benevidez resides in Sacramento County.

12
13 38. Defendant **GAVIN CHRISTOPHER NEWSOM (hereinafter "Newsom")** is an
14 American politician, and businessman serving since 2019 as the 40th governor of the state of
15 California all its many entities, agencies, and subsidiaries (CDCR, DAPO, State Bar of
16 California, California Department of Justice, and California Office of Attorney General.
17 Defendant Newsom engaged in the reckless and wanton conduct complained upon herein while
18 working in the course and scope of his employment with the state of California and as the 40th
19 governor of California. Defendant Newsom is at this moment sued in his official capacity as the
20 governor of the state of California and all its many entities, agencies, and subsidiaries (CDCR,
21 DAPO, State Bar of California, California Department of Justice, and California Office of
22 Attorney General. and in his personal capacity as a citizen of the United States. Defendant
23 Newsom acted under the color of law willfully, recklessly, maliciously, callously, carelessly,
24 and deliberately with callous indifference to KING AROGANT's federally protected civil rights.
25 Defendant Newsom intentionally and recklessly violated KING AROGANT's Fourteenth
26 Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and

27
28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

1 Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and
2 California Constitution Article I, § 26 civil rights. Defendant Newsom resides in Sacramento
3 County.

4
5 39. Defendant **ROBERT ANDRES BONTA (hereinafter “Bonta”)** (SBN # 202668) is an
6 American lawyer and, politician serving since 2021 as the attorney general of the state of
7 California and as the chief attorney overseeing the California Department of Justice and all its
8 many entities, agencies, and subsidiaries (California Department of Justice, and California
9 Office of Attorney General). Defendant Bonta engaged in the reckless and wanton conduct
10 complained upon herein while working in the course and scope of his employment with the state
11 of California and as the attorney general of California. Defendant Bonta is at this moment sued
12 in his official capacity as as the attorney general of the state of California and as the chief
13 attorney overseeing the California Department of Justice and all its many entities, agencies, and
14 subsidiaries (California Department of Justice and California Office of Attorney General), and
15 in his personal capacity as a citizen of the United States. Defendant Bonta acted under the color
16 of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous
17 indifference to KING AROGANT's federally protected civil rights. Defendant Bonta
18 intentionally and recklessly violated KING AROGANT’s Fourteenth Amendment Due Process
19 Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause
20 constitutional civil rights, and his California Constitution Article I, § 7 and California
21 Constitution Article I, § 26 civil rights. Defendant Bonta resides in Sacramento County.

22
23 40. Defendant **PETER DWIGHT HALLORAN (hereinafter “Halloran”)** (SBN # 184025)
24 is a Supervising Deputy Attorney General working from the California Department of Justice
25 and employed by the State of California. Defendant Halloran engaged in the reckless and
26 wanton conduct complained upon herein while working in the course and scope of his
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IED, & NEGLIGENT IED**

employment with the state of California. Defendant Halloran is at this moment sued in his official capacity as a Supervising Deputy Attorney General working from the California Department of Justice and employed by the State of California, and in his personal capacity as a citizen of the United States. Defendant Halloran acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Bonta intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Halloran resides in Sacramento County.

41. Defendant **DENNIS L. BECK (hereinafter "Beck") (SBN # 179492)** is a Supervising Deputy Attorney General working from the California Department of Justice and employed by the State of California. Defendant Beck engaged in the reckless and wanton conduct complained upon herein while working in the course and scope of his employment with the state of California. Defendant Beck is at this moment sued in his official capacity as a Supervising Deputy Attorney General working from the California Department of Justice and employed by the State of California, and in his personal capacity as a citizen of the United States. Defendant Beck acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Bonta intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Beck resides in Sacramento County.

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

42. Defendant **LEAH TAMU WILSON** (hereinafter “**Wilson**”) (SBN # **222790**) is an American lawyer serving since 2021 as the State Bar Board of Trustees appointed Executive Director of the State Bar of California and all its many entities, agencies, and subsidiaries. Defendant Wilson engaged in the reckless and wanton conduct complained upon herein while working in the course and scope of his employment with the state of California and as the State Bar Board of Trustees appointed Executive Director of the State Bar of California and all its many entities, agencies, and subsidiaries. . Defendant Wilson is at this moment sued in her official capacity as the State Bar Board of Trustees appointed Executive Director of the State Bar of California and all its many entities, agencies, and subsidiaries and in her personal capacity as a citizen of the United States. Defendant Wilson acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Bonta intentionally and recklessly violated KING AROGANT’s Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Wilson resides in Sacramento County.

43. Defendant **SAI SRINIVASAN** (hereinafter “**Srinivasan**”). Defendant Srinivasan is a forty-something-year-old senior software engineer (back in) employed by the publicly traded San Mateo, California-based GoPro Inc. (NASDAQ: GPRO). Defendant Srinivasan engaged in the reckless and wanton conduct complained upon herein while working in the course and scope of his employment with the publicly traded San Mateo, California-based GoPro Inc. (NASDAQ: GPRO) and all its many entities, agencies, and subsidiaries. Defendant Srinivasan is at this moment sued in his official capacity as a senior software engineer (back in) employed by the publicly traded San Mateo, California-based GoPro Inc. (NASDAQ: GPRO) and in his personal capacity as a citizen of the United States. Defendant Srinivasan acted under the color of law

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Srinivasan intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Srinivasan resides in Sacramento County.

44. Defendant **ASHLEY ALBIENTO (hereinafter "Albiento")**. Defendant Albiento is a forty-something-year-old Senior Manager of Business Operations & Strategy employed at the publicly traded San Mateo, California-based GoPro Inc. (NASDAQ: GPRO). Defendant Albiento engaged in the reckless and wanton conduct complained upon herein while working in the course and scope of his employment with the publicly traded San Mateo, California-based GoPro Inc. (NASDAQ: GPRO) and all its many entities, agencies, and subsidiaries. Defendant Albiento is at this moment sued in his official capacity as a Senior Manager of Business Operations & Strategy employed at the publicly traded San Mateo, California-based GoPro Inc. (NASDAQ: GPRO), and in her personal capacity as a citizen of the United States. Defendant Albiento acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Albiento intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Albiento resides in Sacramento County.

45. Defendant **BRYCE MILLER (hereinafter "Miller")**. Defendant Miller is a thirty-something-year-old Professional Account Manager employed by the publicly traded Scottsdale,

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

1 Arizona-based Axon Enterprises, Inc. (NASDAQ: AXON). Defendant Miller engaged in the
2 reckless and wanton conduct complained upon herein while working in the course and scope of
3 his employment with the publicly traded Scottsdale, Arizona-based Axon Enterprises, Inc.
4 (NASDAQ: AXON) and all its many entities, agencies, and subsidiaries. Defendant Miller is at
5 this moment sued in his official capacity as a Professional Account Manager employed by the
6 publicly traded Scottsdale, Arizona-based Axon Enterprises, Inc. (NASDAQ: AXON) and in his
7 personal capacity as a citizen of the United States. Defendant Miller acted under the color of law
8 willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference
9 to KING AROGANT's federally protected civil rights. Defendant Miller intentionally and
10 recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause
11 constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil
12 rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26
13 civil rights. Defendant Miller resides in Sacramento County.

14
15 46. Defendant **ELIZABETH BYERS (hereinafter "Byers")**. Defendant Byers is a forty-
16 something-year-old Professional Pubic Safety Software Account Executive employed by the
17 publicly traded Scottsdale, Arizona-based Axon Enterprises, Inc. (NASDAQ: AXON).
18 Defendant Byers engaged in the reckless and wanton conduct complained upon herein while
19 working in the course and scope of her employment with the publicly traded Scottsdale,
20 Arizona-based Axon Enterprises, Inc. (NASDAQ: AXON) and all its many entities, agencies,
21 and subsidiaries. Defendant Byers is at this moment sued in her official capacity as a
22 Professional Pubic Safety Software Account Executive employed by the publicly traded
23 Scottsdale, Arizona-based Axon Enterprises, Inc. (NASDAQ: AXON), and in her personal
24 capacity as a citizen of the United States. Defendant Byers acted under the color of law
25 willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference
26 to KING AROGANT's federally protected civil rights. Defendant Miller intentionally and

27
28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Byers resides in Sacramento County.

47. Defendant **LEO KA FONG LO** (hereinafter "**GoPro Manipulator**") is an Asian-American peace officer working from the California Department of Justice regulated and the State of California funded County of Los Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's Southern California High Tech Task Force and employed by the County of Los Angeles as a sworn-in California state public safety officer/peace officer. Defendant GoPro Manipulator engaged in the reckless and wanton conduct complained upon herein while working in the course and scope of his employment with the County of Los Angeles. Defendant GoPro Manipulator is at this moment sued in his official capacity as a peace officer working from the California Department of Justice regulated and the State of California funded County of Los Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's Southern California High Tech Task Force and employed by the County of Los Angeles as a sworn-in California state public safety officer/peace officer and in his personal capacity as a citizen of the United States. Defendant GoPro Manipulator acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant GoPro Manipulator intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant GoPro Manipulator resides in Los Angeles County.

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

48. Defendant **GEORGE GASCÓN** (hereinafter “Gasón”) (SBN # 182345) is an American attorney and former police officer serving since December 7, 2020, as the 43rd district attorney of the County of Los Angeles District Attorney’s Office and all its many entities, agencies, and subsidiaries (Alhambra Field Office, Cyber Crime Division, & Family Violence Division). Defendant Gascón engaged in the reckless and wanton conduct complained upon herein while working in the course and scope of his employment with the County of Los Angeles and as its 43rd district attorney. Defendant Gascón is at this moment sued in his official capacity as the 43rd district attorney of the County of Los Angeles District Attorney’s Office and all its many entities, agencies, and subsidiaries (Alhambra Field Office, Cyber Crime Division, & Family Violence Division). and in his personal capacity as a citizen of the United States. Defendant Gascón acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Gascón intentionally and recklessly violated KING AROGANT’s Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant Gascón resides in Los Angeles County.

49. Defendant **CHERYL LYNN KAYLOR** (hereinafter “Kaylor”). Defendant Kaylor is a seventy-eight-year-old severely disabled and elderly Caucasian woman. Defendant Kaylor engaged in the reckless and wanton conduct complained upon herein by conspiring with numerous State of California Defendants to violate KING AROGANT’s constitutional civil rights. Defendant Kaylor is, at this moment, sued in her personal capacity as a citizen of the United States. Defendant Kaylor acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally protected civil rights. Defendant Kaylor intentionally and recklessly violated KING

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

1 AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth
2 Amendment Search and Seizure Clause constitutional civil rights, and his California
3 Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant
4 Kaylor resides in Los Angeles County.

5
6 50. Defendant **YING CHUN CHEN (hereinafter "Chen")**. Defendant Chen is a fifty-
7 something-year-old Asian-American woman. Defendant Chen engaged in the reckless and
8 wanton conduct complained upon herein by conspiring with numerous State of California
9 Defendants to violate KING AROGANT's constitutional civil rights. Defendant Chen is, at this
10 moment, sued in her personal capacity as a citizen of the United States. Defendant Chen acted
11 under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately
12 with callous indifference to KING AROGANT's federally protected civil rights. Defendant
13 Chen intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due
14 Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause
15 constitutional civil rights, and his California Constitution Article I, § 7 and California
16 Constitution Article I, § 26 civil rights. Defendant Chen resides in Riverside County.

17
18 51. Plaintiff **KING AROGANT** is unaware of the true and proper names of Defendants
19 listed as DOES 1 through 10, inclusive, and therefore sues them by the fictitious preceding
20 names. The plaintiff will amend his original constitutional civil rights complaint by inserting the
21 proper names instead of said fictitious names, together with apt and proper charging words when
22 said actual names are ascertained. Plaintiff KING AROGANT is informed and believes and
23 thereon alleges that each of the Defendants designated herein as a DOE is responsible and liable
24 to Plaintiff in some manner for the events, happenings, and contention referred to in this original
25 constitutional civil rights complaint. All references herein to "Defendant: or "Defendants" shall
26 be deemed to include all DOE Defendants.

27
28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42
U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42
U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE
PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

52. Plaintiff **KING AROGANT** is informed and believes and thereon alleges that each Defendant, including DOES 1 through 10, was and is the agent, employee, servant, subsidiary, partner, member, associate, co-conspirator, acquaintance, friend, ally, supporter, accessory, amigo, comrade, backer, abettor, instigator sympathizer, confidant or representative of each other Defendant, and that all of the things alleged to have been done in the course and scope of said agency, employment, service, subsidiary, partnership, membership, association, private citizen to local government relationship, or representative relationship and with the knowledge and consent of their respective principals, employers, masters, parent corporations, partners, members, associates, or representatives. Each Defendant has authorized, ratified, acknowledged, consented, authorized, accepted, acquiesced, permitted, allowed, condoned, excused, overlooked, pardoned, tolerated, and approved of all illegal acts, actions, conduct, misconduct, misdeeds, transgressions, and omissions by each other Defendant. Plaintiff KING AROGANT is informed and believes, and thereon alleges, that each of the fictitiously named Defendants is responsible in some manner for the occurrences alleged in this original civil rights complaint and that Plaintiff KING AROGANT's compensatory damages,, punitive damages, general damages, and special damages as alleged in this original constitutional civil rights complaint, were proximately caused by those Defendants.

53. The allegations of this original constitutional civil rights complaint, based on information and belief, will likely have evidentiary support after a reasonable opportunity for further investigation and discovery. Such include issuing federal district court subpoenas duces tecum, the taking of oral depositions, and Requests for Admission and Special Interrogatories, all of which Plaintiff KING AROGANT intends to conduct after the Rule 26(f) conference.

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

1 **X. CONTINUING VIOLATIONS**

2
3 54. The wrongful acts and omissions giving rise to the Defendants' liability in this original
4 constitutional civil rights action commenced on February 21, 2023, and have been and are
5 "continuing" in nature as of the date of filing of this constitutional civil rights complaint on
6 October 30, 2024. Plaintiff KING AROGANT, therefore, HEREBY reserves his right to amend
7 this original constitutional civil rights complaint (Into his FAC) as new and additional facts and
8 claims arise or become known to Plaintiff KING AROGANT.
9

10
11 **XI. FACTS**

12
13 **GENERAL ALLEGATIONS OF COMPLAINT IN SUPPORT OF PLAINTIFF**
14 **KING AROGANT'S CLAIMS FOR RELIEF, REQUESTED**
15 **RELIEF & DAMAGES**
16

17 55. On February 21, 2023, between 11 AM and 3:30 PM, KING AROGANT made numerous
18 telephone calls to the County of Los Angeles Office of Inspector General by dialing (213) 974-
19 6100, County of Los Angeles Sheriff's Department's Risk Management Bureau by dialing (323)
20 890-5400, and the County of Los Angeles District Attorney's Office-Alhambra Field Office by
21 dialing (626) 308-5302. When calling all the above-stated County of Los Angeles public
22 agencies, KING AROGANT complained and told numerous County of Los Angeles employees
23 and peace officers that he was innocent. KING AROGANT complained and told numerous
24 County of Angeles employees and peace officers that he was falsely accused and falsely
25 arrested. KING AROGANT complained and told numerous County of Angeles employees and
26 peace officers that he had audio recording evidence on his mobile phone that would prove that
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

1 he did not make a criminal threat to Jennifer Hutton-Heger (**hereinafter “Hutton”**).

2
3 56. KING AROGANT complained and told numerous County of Angeles employees and
4 peace officers that he had video recording evidence on his GoPro camera that would prove that
5 he never made a criminal threat to Hutton on February 21, 2023. The above-stated facts prove
6 that the County of Los Angeles employees and peace officers had secretly planned to FRAME
7 KING AROGANT for a violent and serious felony crime they knew he did not commit long
8 before the commencement of AROGANT’s rigged felony preliminary hearing that commenced
9 on April 4, 2023. After the filing of this original constitutional civil rights complaint, KING
10 AROGANT will request that the United States Eastern District Court civil clerk’s office issue a
11 subpoena duces tecum that would command Reston, Virginia Global Tel Link to turn over all
12 audio recorded telephone conversations and calls that KING AROGANT made while he was
13 falsely incarcerated at the County of Los Angeles Sheriff’s Department’s Temple City police
14 station on February 21, 2023.

15
16 57. On February 21, 2023, between 1 PM and 4 PM, KING AROGANT yelled out over and
17 over again and even spoke to a male County of Los Angeles Sheriff’s Department peace officer
18 lieutenant acting as the Temple City police station’s watch commander. KING AROGANT
19 requested that this peace officer lieutenant bring KING AROGANT his mobile phone and
20 GoPro camera so he could provide law enforcement exculpatory evidence that would prove that
21 he never threatened to harm Jennifer Hutton-Heger on February 21, 2023, physically, and could
22 then be released after showing County of Los Angeles peace officers his exculpatory evidence.
23 At approximately 4 PM, apparently tired and frustrated with hearing KING AROGANT beg to
24 receive his exculpatory evidence on his mobile phone and GoPro camera. Rogue and RACIST
25 County of Los Angeles peace officer detective Sergeant Richard Lewis (acting peace officer
26 supervisor of Dirty cop Billy S. Khounthavong) snapped at KING AROGANT and told him

27
28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

1 the following:

2 ***"Your phone and GoPro camera have been seized as evidence***
3 ***to be used against you."***
4

5 58. On February 21, 2023, at approximately 6 PM, rogue and dishonest County of Los
6 Angeles peace officer detective Billy S. Khounthavong (**hereinafter "Lying Billy"**) arrived at
7 KING AROGANT's County of Los Angeles Sheriff's Department (hereinafter "LASD")
8 Temple City police station detention holding cell to speak with KING AROGANT. KING
9 AROGANT then knowingly and intelligently waived his Miranda rights. When Lying Billy
10 asked KING AROGANT about what had occurred, KING AROGANT told Lying Billy that the
11 verbal argument and confrontation started over a UBER XL parking dispute outside of Hutton's
12 house. KING AROGANT further told Lying Billy that he had exculpatory video recording and
13 audio evidence on his mobile phone and GoPro camera that Jennifer Hutton Heger was lying
14 and falsely accusing KING AROGANT of making a criminal threat to her on February 21,
15 2023. When KING AROGANT requested and asked Lying Billy if he could bring him his
16 mobile phone and GoPro camera, Lying Billy willfully, knowingly, recklessly, wantonly,
17 maliciously, carelessly, and callously lied to KING AROGANT by telling him that he could not
18 retrieve KING AROGANT's mobile phone and GoPro camera. When KING AROGANT asked
19 Lying Billy if he had seized his mobile phone and GoPro camera, Lying Billy willfully,
20 knowingly, recklessly, wantonly, maliciously, carelessly, and callously lied to KING
21 AROGANT by telling him that he had not seized KING AROGANT's mobile phone and GoPro
22 camera. Towards the end of KING AROGANT's police interview conducted and orchestrated
23 by Lying Billy. Lying, Billy asked KING AROGANT if there were any knives around where he
24 was standing in the kitchen, and AROGANT told Lying Billy that he did not remember seeing
25 any knives inside of Jennifer Hutton Heger's kitchen. Lying Billy's questions to KING
26 AROGANT, asking him if he had seen any knives in Hutton's kitchen, and asking KING
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42
U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42
U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE
PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

1 AROGANT if he had any access to knives while he was standing in Jennifer Hutton Heger's
2 kitchen on February 21, 2023, proves by clear and convincing evidence that LASD, Brian
3 MARK Rosenberg (SBN # 291501), George Gascón (SBN # 182345), and the office of George
4 Gascón willfully, knowingly, recklessly, wantonly, maliciously, carelessly, and callously made-
5 up and created their preliminary hearing case-in-chief that KING AROGANT was standing
6 inside of Jennifer Hutton Heger's kitchen and then turned around facing her while KING
7 AROGANT was brandishing a kitchen knife. This fact can be further proven true by the
8 fabricated lies and statements of both Jennifer Hutton Heger's original video recorded February
9 21, 2023 police interview and the police statements documented by County of Los Angeles
10 rogue peace officers Alex Contreras and Daniel Esqueda. In fact, Jennifer Hutton-Heger did not
11 accuse KING AROGANT of brandishing a knife in her kitchen until she had her body camera
12 recorded County of Los Angeles District Attorney's Office police interview with racist deputy
13 district attorney Brian MARK Rosenberg (SBN # 291501) and his co-conspirator Billy S.
14 Khounthavong on or about March 9, 2023. This proved yet again that the County of Los
15 Angeles and Defendant George Gascón willfully, knowingly, recklessly, wantonly, maliciously,
16 carelessly, and callously conspired to violate KING AROGANT's constitutional civil rights by
17 framing him prior to the commencement of KING AROGANT's preliminary hearing
18 commencing on April 4, 2023.

19
20 59. On February 21, 2023, between 6:30 PM and 9:30 PM, rogue peace officer Billy S.
21 Khounthavong spent time illegally accessing, illegally copying, illegally downloading, and
22 illegally reviewing GoPro video recordings stored on KING AROGANT's GoPro camera that
23 were recorded on February 20, 2023, that were recorded prior to February 21, 2023, and that
24 were created on February 21, 2023. After reviewing several video recordings from February 21,
25 2023, Lying Billy realized that KING AROGANT had the entire verbal confrontation with
26 Jennifer Hutton-Heger recorded continuously. This is when rogue and charged in a criminal

27
28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

1 federal district court dirty cop Billy S. Khounthavong came up with the idea to author and create
2 a bogus search warrant and then send KING AROGANT's continuous nearly fifteen-minute
3 GoPro video recording to the California Department of Justice regulated and funded County of
4 Los Angeles Sheriff's Office's Fraud and Cyber Crimes Bureau's Southern California High
5 Tech Task Force so corrupt and rogue peace officer detectives there could willfully, knowingly,
6 recklessly, carelessly, maliciously, wantonly, and callous alter, manipulate, edit, and taint KING
7 AROGANT's February 21, 2023, entirely exculpatory so they could all FRAME KING
8 AROGANT at his preliminary hearing for a very serious and violent felony they and Defendant
9 George Gascón all knew that KING AROGANT had never committed. Since February 21, 2023,
10 KING AROGANT stated to County of Los Angeles peace officers both over the telephone and
11 in person that he had exculpatory audio recording and text message evidence on his Samsung
12 Galaxy S21 Ultra mobile phone. Lying Billy either stole KING AROGANT's Samsung Galaxy
13 S21 Ultra mobile phone or disposed of his mobile phone. Billy Khounthavong recklessly
14 violated AROGANT's Fourth Amendment and Fourteenth Amendment constitutional civil
15 rights by deliberately disposing of KING AROGANT's mobile phone, which they all knew
16 contained an entirely exculpatory audio recording and text message evidence that KING
17 AROGANT could have used while acting in propria persona to exonerate himself. While KING
18 AROGANT's original February 21, 2023, GL010586 GoPro video recordings clearly depict and
19 display him with his mobile phone the entire time, and then placing it with the rest of his
20 personal property located inside of Jennifer Hutton Heger's home just prior to being recklessly
21 apprehended by rogue and dishonest County of Los Angeles peace officers Alex Contreras and
22 Daniel Esqueda, KING AROGANT never saw his Samsung Galaxy S21 Ultra mobile phone
23 again after February 21, 2023 at approximately 10:30 AM. Several weeks later, after KING
24 AROGANT was arrested, Lying Billy and other rogue County of Los Angeles peace officers
25 created a fabricated, false, phony, bogus, misleading, and fraudulent police report that stated that
26 they had searched diligently and thoroughly through all KING AROGANT's personal property
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

1 but did not locate or find his KING AROGANT's Samsung mobile phone. LIARS. All through
2 KING AROGANT'S original GoPro video recordings, he is seen with his mobile phone in his
3 hand! All through Defendant George Gascon, Defendant Lo, and LASD's manipulated GoPro
4 video recordings, KING AROGANT, is seen with his mobile phone in his hand! KING
5 AROGANT Samsung Galaxy S21 Ultra mobile phone was never lost or not transported to the
6 LASD Temple City police station on February 21, 2023. Lying Billy disposed of it because the
7 KING AROGANT's original GoPro video recordings watched by Lying Billy on February 21,
8 2023 alerted him to the facts that KING AROGANT's mobile phone contained on it exculpatory
9 audio recording and text message evidence that could have been used to exonerate KING
10 AROGANT. For example, in KING AROGANT's original, uninterrupted, and continuous
11 nearly seventeen-minute GoPro video recordings, KING AROGANT is visibly seen in this
12 video recordings checking the audio recording application on his recklessly disposed of by
13 Lying Bill Samsung S21 to make sure that it was recording the entire confrontation with
14 Jennifer Hutton-Heger on the morning of February 21, 2023 In KING AROGANT's original,
15 uninterrupted, and continuous nearly seventeen-minute GoPro video recordings KING
16 AROGANT is visibly seen in this video recording sending two text messages to Jennifer Hutton
17 Heger on his recklessly disposed of by Lying Billy Samsung S21 that proved his state of mind
18 and his innocence. Lying Billy willfully, knowingly, recklessly, carelessly, maliciously,
19 wantonly, and callously made KING AROGANT's Samsung S21 Ultra mobile phone disappear
20 because it contained exculpatory evidence that would have exonerated KING AROGANT
21 easily. Given Billy S. Khounthavong's criminal indictment in the United States District Court
22 Central District Court of California for case number **13-3105M**. No one can believe anything he
23 says or does because Lying Billy is and was a very crooked and corrupt State of California
24 peace officer employed by the County of Los Angeles peace officer. In December 2013, Billy
25 Khounthavong and his brothers Johnny Khounthavong and Benny Khounthavong (both brothers
26 are peace officers) were all charged in the federal district court for the Central District Court of
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

California for recklessly falsifying federal mortgage loan documents. If Lying Billy Khounthavong would willfully, knowingly, and recklessly falsify a federal loan document. Surely Lying Billy would willfully, knowingly, recklessly, wantonly, maliciously, carelessly, and callously falsify a police report and Superior Court of California, County of Los Angeles search warrant affidavit, which is exactly what Lying Billy did in frivolous and unconstitutional felony criminal case GA114055 on February 22, 2023.

60. At the rigged and unconstitutional preliminary hearing held on April 4, 2023, and April 5, 2023, rogue and corrupt peace officer Billy S. Khounthavong testified that he requested Southern California High Tech Task Force peace officers download and retrieve GoPro video recordings from KING AROGANT's GoPro camera that were recorded on February 20, 2023, and February 21, 2023. Lying Billy's testimony proved that he illegally accessed and retrieved KING AROGANT's GoPro video recordings prior to obtaining a search warrant, and Lying Billy lied on his bogus supplemental police report that he had legally obtained a search warrant from the Superior Court of California County of Los Angeles, Pasadena Superior Court corrupt and racist criminal judicial officer Suzette Clover on February 22, 2023. Further, Lying Billy's testimony proved the foulness and extreme prejudice of GA114055. Lying Billy's fabricated testimony proves the foulness and extreme prejudice of the Superior Court of California, County of Los Angeles, Alhambra Superior Court case GA114055. Lying Billy's phony and forged search warrant did not request to search KING AROGANT's GoPro camera's video recordings that were recorded prior to February 21, 2023. No Superior Court of California would have issued a search warrant allowing peace officers to search a GoPro camera's video recordings recorded on February 20, 2023, when the criminal threat was alleged to have occurred on February 21, 2023. KING AROGANT's GoPro video recordings recorded on February 20, 2023, were entirely unrelated to both KING AROGANT's arrest and false allegations and accusations recklessly and knowingly made by State of California FAKE VICTIM government

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

1 witness Jennifer Hutton-Heger. Even if Billy S. Khounthavong's search warrant was valid (and
2 it was not valid) it did not give him and other LASD peace officers involved with the illegal
3 criminal investigation legal authorization and legal permission to review, access, copy, and
4 otherwise seize KING AROGANT's GoPro video recordings recorded on February 20, 2023
5 that were entirely unrelated to the make-believe February 21, 2023 criminal threats arrest and
6 incident that resulted in the false arrest of KING AROGANT. Lying Billy, Defendant Lo,
7 the County of Los Angeles Fraud and Cyber Crimes Bureau's California Department of Justice
8 funded and regulated Southern California High Tech Task Force peace officers' illegal access,
9 illegal search, illegal seizure, and illegal copy of KING AROGANT's GoPro video recordings
10 recorded on February 20, 2023, was far more of a serious and scandalous United States
11 Constitution Fourth Amendment Search and Seizure Clause constitutional civil rights violation
12 than Lying Billy's phony and bogus search warrant. The only reason Lying Billy and his co-
13 conspirator peace officers copied and searched KING AROGANT's February 20, 2023, video
14 recordings was because they needed to find a GoPro video recording of KING AROGANT
15 shutting off his GoPro camera. Since Billy S. Khounthavong and Southern California High Tech
16 Task Force peace officers had reviewed KING AROGANT's continuous GoPro video recording
17 GL010586, they knew that there were no GoPro video recordings of KING AROGANT shutting
18 off his GoPro camera on February 21, 2023. A true AH HA moment for Defendants George
19 Gascon and Leo Ka Fong Lo. This is why in real GoPro video recordings GL010586,
20 GL010587, GL010588, and GL010589 (all of which were split up from original and continuous
21 GoPro video recordings GL010586) and also in police body camera video recordings depicting
22 the February 21, 2023 incident KING AROGANT is only seen on video wearing a long-sleeved
23 coat and black pants, but in Defendants George Gascon and Leo Ka Fong Lo's phony LASD-
24 created GoPro video recording GL010586 KING AROGANT is seen only on video wearing a
25 tank top, shorts, and then he is seen shutting off his GoPro camera with a bare right arm, proving
26 further that KING AROGANT had on a tank top in Defendants' phony and bogus LASD-

27
28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

created GoPro video recording GL010586. In Defendants' phony and bogus LASD-created GoPro video recording, GLO101587 is not seen standing in Jennifer Hutton Heger's mirror.



This particular video recording frame sequence was cut out and removed deliberately by LASD Southern California High Tech Task Force peace officers who were employed to frame KING AROGANT in furtherance of Defendant Lo, Defendant Gascon, LASD, and County of Los Angeles' conspiracy to recklessly violate KING AROGANT's Fourth and Fourteenth Amendment constitutional civil rights. In KING AROGANT's original, uninterrupted, and continuous GoPro REAL video recording GL010586, KING AROGANT is seen standing in Jennifer Hutton Heger's mirror with his reflection in the original GoPro video recording depicting and displaying KING AROGANT wearing a long-sleeved coat, GoPro chest harness with his GoPro camera attached, baggy pants, and KING AROGANT is depicted and displayed having long dreadlocks hanging from his face and shoulders. This is why Defendant Geoge

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

1 Gascón's County of Los Angeles criminal prosecutors Brian MARK Rosenberg and Victor
2 Manuel Rodriguez, Billy S. Khounthavong, and Defendant Lo have done everything in their
3 power to keep phony LASD-created GoPro video recordings GL010586 and GL010587 out of
4 the hands of KING AROGANT, out of the hands of his two private investigators Carlos
5 Anthony Jackson, out of the hands of his private investigator Joel Wyenn, out of the hands of
6 lying and RACIST Superior Court of California audio recording and video recording expert
7 witness Thomas Leo Guzman-Sanchez, and out of the hands of criminal defense attorney Neil
8 Opdahl (SBN # 277596) [who was the court-appointed co-counsel in frivolous and
9 unconstitutional Superior Court of California, County of Los Angeles, Alhambra Superior Court
10 criminal case GA114055]. Disclosure would immediately end Defendant Gascón's false case
11 because, in phony LASD-created GoPro video recordings, GL010586 and GL010587, KING
12 AROGANT is not even wearing the same clothing he had on February 21, 2023. The reckless
13 actions of the above-stated Defendants to willfully, knowingly, recklessly, wantonly,
14 maliciously, carelessly, and callously present to the Superior Court of California, County of Los
15 Angeles, Alhambra Superior Court phony and bogus GoPro video recordings GL010586 and
16 GL010587 for the unlawful purpose of tricking, lying to, fooling, manipulating, and otherwise
17 deceiving a criminal Superior Court that these phony LASD-created GoPro video recordings
18 were recorded by KING AROGANT on February 21, 2023, was reckless under color of law
19 fraud. The reckless actions of the above-stated Defendants to willfully, knowingly, recklessly,
20 wantonly, maliciously, carelessly, and callously present to the Superior Court of California,
21 County of Los Angeles, Alhambra Superior Court phony and bogus GoPro video recordings
22 GL010586 and GL010587 for the unlawful purpose of failing to tell, failing to inform,
23 concealing from, and otherwise deceiving a criminal Superior Court that these Defendants and
24 their co-conspirators were in possession of KING AROGANT's REAL GoPro video recordings
25 and knew that pursuant to California Evidence Code § 1522 they were committing under color
26
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED**

of law fraud by presenting phony LASD-created GoPro video recordings GL010586 and GL010587 to the Alhambra Superior Court while the entire time KING AROGANT's original GoPro video recordings were in the possession of Defendants Lo, Gascón, Victor Manuel Rodriguez, Billy S. Khounthavong, Brian MARK Rosenberg, and many others, and they then recklessly failed to present the original GoPro video recordings in the Superior willfully, knowingly, recklessly, wantonly, maliciously, carelessly, and callously Court in support of their false and fabricated case-in-chief. Further, Defendants Lo and Gascón willfully, knowingly, recklessly, wantonly, maliciously, carelessly, and callously violated KING AROGANT's Fourth Search and Seizure Amendment constitutional civil rights, and his Fourteenth Amendment Due Process Clause constitutional civil rights by recklessly presenting to the Superior Court phony LASD-created GoPro video recordings GL010586 and GL010587 while the original were in Defendants' physical possession and while Defendants had no valid search warrant to had seized KING AROGANT's original GoPro Heero 10 action camera in the first place.

61. Leo Ka Fong Lo, George Gascón, Billy S., Khounthavong, Brian MARK Rosenberg, and Victor Manuel Rodriguez were able to willfully, knowingly, recklessly, wantonly, maliciously, carelessly, and callously

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

1 **AROGANT HOLLYWOOD, Esq.**
2 **1308 EAST COLORADO BLVD.**
3 **PASADENA, CA 91106**
4 **Mobile: 626.755.6442**
5 **aroganthollywoodgenius@gmail.com**

6 **OF HIS OWN COUNSEL**

7 **3-0 On Charged Felony Cases Maliciously Prosecuted**
8 ***Spirit of Esquire***



11
12
13
14
15
16
17
18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
19 **NORTHEAST DISTRICT, COUNTY OF LOS ANGELES**
20 **ALHAMBRA SUPERIOR COURT**

21
22 people of the state of california,
23
24 Prosecutor,

25
26 V

27
28 AROGANT HOLLYWOOD,
Defendant,

Railroaded and Wrongfully Convicted

) **Case No. GA114055**

)
) **Arogant Hollywood's VERIFIED NOTICE OF AND MOTION THAT**
) **SUPRIOR COURT ORDER PEOPLE IMMEDIATELY DISCLOSE**
) **AND TURN OVER BOGUS LASD-CREATED GOPRO VIDEO**
) **RECORDINGS GL010586 AND GL010587 Pursuant to California**
) **Penal Code §§ 745, 1473.6, & 1473.7; *Brady v. Maryland*, 373 U.S. 83,**
) **83 S.Ct. 1194, 10 L.Ed.2d 215 (1963); *United States v. Bagley*, 473 U.S.**
) **667, 682, 105 S.Ct. 3375, 87 L.Ed.2d 481 (1985); County of Los Angeles**
) **District Attorney Discovery Compliance System Manual, County of Los**
) **Angeles District Attorney Legal Policies Manual, Chapter 14, & United**
) **States Department of Justice Manual, Title 9, § 9-5.000 & REQUEST**
) **THAT SUPERIOR COURT ORDER THAT AROGANT**
) **HOLLYWOOD'S UNCONSTITUTIONAL PAROLE SUPERVISION**
) **BE IMMEDIATELY TERMINATED**

) **Date of Hearing: June 21, 2024**
) **Department _____**
) **Time: _____**

**NOTICE OF MOTION TO DEMAND
DISCOVERY AND TERMINATE PAROLE**

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

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

**NOTICE OF MOTION TO DEMAND
DISCOVERY AND TERMINATE PAROLE**

Case No. GA114055

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

1 TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY GEORGE
2 GASCON.
3

4
5 TO THE COUNTY OF LOS ANGELES CHIEF DISTRICT ATTORNEY
6 JOSEPH FRANK INIGUEZ (SBN # 285260).
7

8
9 TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
10 CHIEF OF STAFF TIFFINY TOWEND BLACKNELL (SBN # 223529)
11

12 TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
13 LINE OPERATIONS ACTING ASSISTANT DISTRICT ATTORNEY RONALD
14 MILLARD GELTZ (SBN # 126699).
15

16
17 TO RACIST AND BIASED COUNTY OF LOS ANGELES DISTRICT
18 ATTORNEY'S OFFICE ETHICS AND INTEGRITY ASSISTANT DISTRICT
19 ATTORNEY JAMES WILLIAM GARRISON (SBN # 157070).
20

21 TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
22 SPECIAL ASSISTANT FERNANDO SANCHEZ (SBN # 312245).
23

24
25 TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
26 PUBLIC AFFAIRS DIRECTOR MICHAEL DAVID KAPP (SBN # 2779277).
27

28 TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
SPECIAL ASSISTANT KATHRYN BAILEY ALBRACHT (SBN # 175822).

NOTICE OF MOTION TO DEMAND
DISCOVERY AND TERMINATE PAROLE

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
2 BRANCH AND OPERATIONS REGION II DIRECTOR ARISA MATTSON (**SBN #**
3 **195578**).
4

5
6 TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
7 DIRECTOR OF BUREAU OF VICTIM SERVICES TANISHIA G. WRIGHT (NON-
8 ATTORNEY).
9

10
11 TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
12 FRAUD AND CORRUPTIONS PROSECUTING DIRECTOR MARC CORNELIS
13 BEAART (**SBN # 1773364**).
14

15
16 TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
17 PROSECUTION SUPPORT OPERATIONS DIRECTOR STEPHANIE PEARL MIRE
18 (**SBN # 158918**).
19

20
21 TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
22 CENTRAL OPERATIONS DIRECTOR LAURA JANE KESSNER (**SBN # 175337**).
23

24 TO RACIST, BIASED, AND PREJUDICED COUNTY OF LOS ANGELES
25 DISTRICT ATTORNEY'S OFFICE FAMILY LAW DIVISION HEAD DEPUTY IN
26 CHARGE JANIS EVE JOHNSON (**SBN # 175280**).
27

28
TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
FAMILY LAW DIVISION ASSISTANT DEPUTY IN CHARGE KATHY UYEN TA
(**SBN # 243716**).

NOTICE OF MOTION TO DEMAND
DISCOVERY AND TERMINATE PAROLE

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 TO RACIST AND BIAS COUNTY OF LOS ANGELES DISTRICT
2 ATTORNEY'S OFFICE FAMILY LAW DIVISION ASSISTANT DEPUTY IN
3 CHARGE PAK B. KOUCH (SBN # 204373).
4

5
6 TO THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
7 ALHAMBRA AREA OFFICE ASSISTANT DEPUTY IN CHARGE MARY ANNE
8 MURRAY (SBN # 185518).
9

10
11 TO RACIST AND BIASED COUNTY OF LOS ANGELES DISTRICT
12 ATTORNEY'S OFFICE ALHAMBRA AREA OFFICE DEPUTY IN CHARGE
13 VICTOR MANUEL RODRIGUEZ (SBN # 156150).
14

15
16 TO RACIST AND BIASED COUNTY OF LOS ANGELES DISTRICT
17 ATTORNEY'S OFFICE ALHAMBRA AREA OFFICE DEPUTY DISTRICT
18 ATTORNEY BRIAN MARK ROSENBERG (SBN # 291501).
19

20
21 TO RACIST AND BIASED COUNTY OF LOS ANGELES DISTRICT
22 ATTORNEY'S OFFICE ALHAMBRA AREA OFFICE DEPUTY DISTRICT
23 ATTORNEY CINDY JUHYUN PARK (SBN # 271933).
24

25 **PLEASE TAKE NOTICE** that on June 24, 2024, at 8:30 a.m. in Department
26 _____ of the Pasadena Superior Courthouse located 300 East Walnut Street, Pasadena,
27 CA 91101. **RAILROADED AND WRONGFULLY CONVICTED INNOCENT**
28

**NOTICE OF MOTION TO DEMAND
DISCOVERY AND TERMINATE PAROLE**

Case No. GA114055

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

CRIMINAL DEFENDANT AROGANT HOLLYWOOD will move this Court for a **COURT ORDER DEMANDING** that the People turn over and disclose a playable electronic copy of phony LASD-CREATED GOPRO video recordings impeaching evidence GL010586 and GLO10587 that was recklessly, willfully, wantonly, maliciously, and callously played before and presented to State of California criminal Superior Court judicial district NORTHEAST on April 4, 2023, April 5, 2023, and February 2, 2024 and that the Superior Court ORDER that AROGANT HOLLYWOOD'S parole be immediately terminated based upon the following grounds:

1. The People Have A Statutory Obligation to Disclose Impeaching Video Recording Evidence Pursuant to California Penal Code § 1054.1.
2. The People Have A Statutory Obligation to Disclose Impeaching Video Recording Evidence Pursuant to Arogant Hollywood's Rights to Present Such Evidence During His Appeal.
3. The People Have A Statutory Obligation to Disclose Impeaching Video Recording Evidence Pursuant to California Penal Code § 745, subdivision (d).
4. The People Have A Statutory Obligation to Disclose Impeaching Video Recording Evidence Pursuant to California Penal Code § 1473.6 & 1473.7.
5. The People Have A Constitutional Obligation to Disclose Impeaching Video Recording Evidence Pursuant to *Brady v. Maryland* & *United States v. Bagley*.
6. County of Los Angeles District Attorney George Gascon Has An Obligation To Disclose Impeaching Video Recording Evidence Pursuant to His DA's Office Policies Pursuant to Discovery Compliance System Manual.

**NOTICE OF MOTION TO DEMAND
DISCOVERY AND TERMINATE PAROLE**

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

- 1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
7. County of Los Angeles District Attorney George Gascon Has An Obligation To Disclose Impeaching Vide Recording Evidence Pursuant to His DA's Office Policies Pursuant to Legal Policies Manual, Chapter 14.
 8. California Department of Corrections and Rehabilitation Adult Parole Director Jason D. Johnson, and Secretary Jeffrey Macomber Have Recklessly Failed to Terminate AROGANT'S Unconstitutional Parole Supervision Even After Being Emailed and Faxed Numerous Pieces of Evidence that Proved That Arogant Is Innocent and Proved AROGANT Had His Probation Terminated and Was Sentenced to Prison Based On Reckless and Intentionally False Court Testimony By Racist and Biased Los Angeles County Superior Court Expert Witness Thomas Leo Guzman-Sanchez

17
18
19
20
21
22
23
24
25
26
27
28


This verified motion will be based upon this notice of motion and motion, on the memorandum of points and authorities, on the declaration of co-counsel Neil Opdahl-Lopez (**SBN # 277596**), on the sworn under oath declarations of Arogant Hollywood and Alison Helen Fairchild, on the original GoPro video recordings presented and admitted at the evidentiary hearing in support of the motion, on any such oral testimony permitted, on the attached Exhibits, and on any other such evidence that may be presented at the hearing on the motion.

**NOTICE OF MOTION TO DEMAND
DISCOVERY AND TERMINATE PAROLE**

Case No. GA114055

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

1 **DATE: June 8, 2024**

2
3
4 BY 

5
6
7 Arogant Hollywood, *Esq.*
8 1308 East Colorado Blvd.
9 Pasadena, CA 91106
10 Mobile: (323) 240-0643
11 Email: aroganthollywoodgenius@gmail.com

12 *Spirit of Esquire*



**NOTICE OF MOTION TO DEMAND
DISCOVERY AND TERMINATE PAROLE**

Case No. GA114055

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

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

PROOF OF SERVICE

I certify that on June 16, 2024, I served one **copy** of the foregoing.

Arogant Hollywood's VERIFIED NOTICE OF AND MOTION THAT SUPRIOR COURT ORDER PEOPLE IMMEDIATELY DISCLOSE AND TURN OVER BOGUS LASD-CREATED GOPRO VIDEO RECORDINGS GL010586 AND GL010587 Pursuant to California Penal Code §§ 745, 1473.6, & 1473.7; *Brady v. Maryland*, 373 U.S. 83, 83 S.Ct. 1194, 10 L.Ed.2d 215 (1963); *United States v. Bagley*, 473 U.S. 667, 682, 105 S.Ct. 3375, 87 L.Ed.2d 481 (1985); County of Los Angeles District Attorney Discovery Compliance System Manual, County of Los Angeles District Attorney Legal Policies Manual, Chapter 14, & United States Department of Justice Manual, Title 9, § 9-5.000 & REQUEST THAT SUPERIOR COURT ORDER THAT AROGANT HOLLYWOOD'S UNCONSTITUTIONAL PAROLE SUPERVISION BE IMMEDIATELY TERMINATED

,and any and all attachments, by electronic mail (.pdf format) on following:

Geroge Gascon [SBN # 182345], District Attorney

georgegascon@da.lacounty.gov

Joseph Frank Iniguez [SBN # 285260], Chief Deputy District Attorney

jiniguez@da.lacounty.gov

Tiffany Townend Blacknell [SBN # 223529], Chief of Staff

tiffinytownend@hotmail.com

Ronald Millard Geltz [SBN # 263186], Line Operations Acting Assistant D.A.

rgeltz@da.lacounty.gov

James William Garrison [SBN # 157070], Ethics and Integrity Assistant District Attorney

jgarrison@da.lacounty.gov

PROOF OF SERVICE UPON THE PEOPLE

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 **Fernando Sanchez** [SBN # 312245], Special Assistant
2 fsanchez@da.lacounty.gov
3

4
5 **Michael David Kapp** [SBN # 2779277], Public Affairs Director
6 mkapp@da.lacounty.gov
7

8
9 **Kathryn Bailey Albracht** [SBN # 175822], Special Assistant
10 kalbrach@da.lacounty.gov
11

12 **Arisa Mattson** [SBN # 195578], Branch and Operations Region II Director
13 amattson@da.lacounty.gov
14

15 **Tanishia Wright** [non attorney], Director of Bureau of Victim Services
16 twright@da.lacounty.gov
17

18
19 **Marc Cornelis Beaart** [SBN # 173364], Director of Fraud and Corruption
20 mbeaart@da.lacounty.gov
21

22
23 **Stephanie Pearl Mire** [SBN # 158918], Prosecutions Support Operations Director
24 spmire@da.lacounty.gov
25

26 **Laura Jane Kessner** [SBN # 175337], Central Operations Director
27 ljkessner@da.lacounty.gov
28

PROOF OF SERVICE UPON THE PEOPLE

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 [SBN # 173364], Director of Fraud and Corruption

2 mbeaart@da.lacounty.gov

4
5 Stephanie Pearl Mire [SBN # 158918], Prosecutions Support Operations Director

6 spmire@da.lacounty.gov

8
9 Laura Jane Kessner [SBN # 175337], Central Operations Director

10 ljessner@da.lacounty.gov

11
12 Janis Eve Johnson [SBN # 175280], Head Deputy DA of Family Violence Division (74)

13 jjohnes@aol.com

14
15 Brittany Nicole Nickolas [RELATED TO EVE]

16 brittnick23@gmail.com

17 bnickolas@yahoo.com

18 zlzlbrittnick23@yahoo.com

19
20
21 Kathy Uyen Ta [SBN # 243716], Assistant Head Deputy DA of Family Violence Division

22 kta@da.lacounty.gov

23
24
25 Pak B. Kouch, [SBN # 204373], Assistant Head Deputy DA of Family Violence Division

26 pkouch@da.lacounty.gov

27
28 Mary Anne Murray [SBN # 185518], Assistant Head Deputy DA of Alhambra Field Office

mmurray@da.lacounty.gov

PROOF OF SERVICE UPON THE PEOPLE

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

Victor Manuel Rodriguez [SBN # 156150], Head Deputy DA of Alhambra Field Office
vrodriguez@da.lacounty.gov

Cindy Juhyun Park [SBN # 271933], Deputy DA of Alhambra Field Office
cpark@da.lacounty.gov

Robert Luna, SHERIFF OF LOS ANGELES COUNTY SHERIFF'S DEPARTMENT
rluna@lasd.org

Rogue Peace Officer Leo Ka Fong Lo [In possession of phony GOPRO video recordings]
lklo@lasd.org

Rogue Peace Officer Billy Khounthavong [Responsible for sending AROGANT's GOPRO camera to Southern California High Tech Task Force and Testing Falsely that Phony GOPRO video recordings GL010586 and GL010587 were downloaded from AROGANT's original GOPRO.

bskhount@lasd.org

Robert Bonta, California Attorney General
rbonta@doj.ca.gov

Nicole Amber Davis-Tinkham, Chief Deputy County Counsel of County of Los Angeles
rdavis-tinkham@counsel.lacounty.gov

nikki.davis1212@gmail.com

PROOF OF SERVICE UPON THE PEOPLE

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

Judy Welch-Whitehurst, Chief Deputy County Counsel of County of Los Angeles

jwhitehurst@counsel.lacounty.gov

County of Los Angeles District Attorney's Office Headquarters

info@da.lacounty.gov

and facsimile on the following:

**626.281.4724 (COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
ALHAMBRA LOCATION)**

**213.633.1956 (COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE
HEADQUARTERS FAX NUMBER)**

**213.633.0960 (COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE FAMILY
VIOLENCE DIVISION FAX NUMBER)**

**916.323.5341 (CALIFORNIA DEPARTMENT OF JUSTICE, OFFICE OF ROBERT
BONTA, ATTORNEY GENERAL'S FACSIMILE NUMBER)**

**I declare under penalty of perjury under the laws and Constitution of California, and under the
laws, federal statutes, and Constitution of the United States of America that the foregoing
declaration is true and correct.**

Executed on June 10, 2024, in California, Los Angeles County, city of Los Angeles, California

PROOF OF SERVICE UPON THE PEOPLE

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 **DATE: June 10, 2024**

2
3
4
5 *Arogant Hollywood*
6

7
8 Arogant Hollywood, *Esq.*
9 1308 East Colorado Blvd.
10 Pasadena, CA 91106
11 Mobile: (323) 200-4449
12 Email: aroganthollywoodgenius@gmail.com

13 *Spirit of Esquire*



PROOF OF SERVICE UPON THE PEOPLE

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

TABLE OF CONTENTS

Page(s)

I.	INTRODUCTION.....	1
II.	PROCEDURAL HISTORY.....	2
III.	STATEMENT OF FACTS.....	4
IV.	THE APPLICATION OF LEGAL STANDARDS, ARGUMENT & AUTHORITY.....	25
V.	LEGAL ARGUMENT.....	15

1.

A. 30

B. 30

TABLE OF CONTENTS

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

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

TABLE OF CONTENTS

Page(s)

C.

VI. CONCLUSION.....43

TABLE OF AUTHORITIES

Cases	Page(s)
--------------	----------------

United States Supreme Court Cases	
--	--

California Supreme Court Cases	
---------------------------------------	--

California State Appellate Cases	
---	--

TABLE OF AUTHORITIES

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

I. INTRODUCTION

The People just couldn't help themselves after Arogant Hollywood (**hereinafter "AROGANT"**) emailed his REAL GOPRO video recording proving his factual innocence with clear and convincing evidence. The People responded by presenting the same phony GOPRO video recordings on February 2, 2024, that were also presented and admitted as false evidence in a criminal Superior Court on April 4, 2023, and April 5, 2023. Numerous emailed California DOJ criminal and civil attorneys ignored AROGANT'S numerous emails that documents and proved his factual innocence.

II. PROCEDURAL HISTORY

In April 2023, AROGANT filed a motion with the Superior Court requesting that the People and Brian Mark Rosenberg (**from now on "MARK"**) turn over and disclose an electronic copy of phony LASD-created GOPRO video recordings that depicted AROGANT shutting off his GOPRO camera on the early morning of February 21, 2023. Biased and prejudiced judicial officer Michael Villalobos never held a hearing on AROGANT's motion, nor did he request that MARK and the People provide the defense with a copy of such impeaching video recording evidence.

At the preliminary hearing held on April 4, 2023, the People and MARK willfully, recklessly, maliciously, wantonly, and callously presented to the Superior Court phony GoPro video recordings that (1) showed AROGANT mechanically shutting off his GoPro camera and (2) falsely showed AROGANT getting up from his seat to meet a UBER driver and also walking and standing in front of Jennifer Hutton Heger's (**hereinafter "Hutton"**) front door without ever standing in Hutton's mirror as AROGANT is seen

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 doing in the REAL video recordings. MARK also told the Superior Court that he saw
2 AROGANT shutting off his GoPro camera himself.
3

4
5 MARK Rosenberg: He saying it's continuous? It shows him turning it off
6 right there. You know what, I'm going to play it again.
7 I'm tired of this.
8

9 Prejudice Villalobos: You don't have to do that. Mr. Hollywood, you'll get
10 your chance. Hold on.
11

12 **See Reporter's Transcript of Proceedings, April 4, 2023, AM Session, Day 1, on**
13 **Page 36, Official Reporter Andriana Montanez.**
14

15 At the preliminary hearing held on April 5, 2023, the rogue and corrupt County of
16 Los Angeles peace officer Billy S. Khounthavong testified falsely that phony GOPRO
17 video recordings GL010586 and GL010587 were downloaded and retrieved from
18 AROGANT's GoPro camera by Los Angeles County Sheriff's Department Fraud and
19 Cyber Crimes Bureau Southern California High Tech Task Force peace officers.
20
21

22 MARK Rosenberg: And the videos that you retrieved, how did you get those?
23
24

25 Billy Khounthavong: I submitted the GOPRO to our high-tech bureau and
26 detectives from that bureau downloaded the data from the
27 GoPro itself, and I retrieved data from them.
28

1 **See Reporter's Transcript of Proceedings, Preliminary Hearing, Day 2, April 5,**
2
3 **2023, on Page 23, Official Reporter Andriana Montanez.**

4 In late May 2024 prejudiced State of California judicial officer Michael Villalobos
5
6 appointed Carlos Anthony Jackson as AROGANT'S private investigator and awarded
7
8 him forty work hours to investigate frivolous criminal case GA114055 for the defense.

9 From May 25, 2023, until July 6, 2023, State of California Alhambra Superior
10
11 Courthouse Department 1 was dark and AROGANT had no court appearances.

12
13 On July 7, 2023, AROGANT was again in Alhambra Superior Court, Department
14
15 1, with the biased, racist, and prejudiced Michael Villalobos presiding. At this Superior
16
17 Court hearing, AROGANT filed another California Penal Code § 1054.1 motion
18
19 requesting the People turn over and disclose a copy of phony LASD-created GOPRO
20
21 video recordings that depicted and displayed AROGANT shutting off his GOPRO
22
23 camera. Once again Villalobos failed to hold a hearing on AROGANT's motion, nor did
24
25 he order the People and MARK to turn over phony GOPRO video recordings that
26
27 depicted and displayed AROGANT shutting off his GOPRO camera.

28
On July 7, 2023 prejudice State of California judicial officer Michael Villalobos
appointed racist expert witness Thomas Leo Guzman-Sanchez

On or about September 6, 2023, AROGANT requested that Villalobos sign a
drafted ORDER created by AROGANT that would ORDER the People and MARK to
immediately provide AROGANT a copy of all sixteen GOPRO video recordings that
were willfully, recklessly, wantonly, maliciously, and callously played, presented,

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 testified to, and displayed at the preliminary hearing on April 4, 2023, and April 5, 2023,
2 specifically the phony GOPRO video recordings showing AROGANT meeting the
3 UBER driver and shutting off his GoPro camera. Prejudice Michael Villalobos outright
4 refused to sign AROGANT's nearly fourteen-page ORDER that would compel the
5 People to turn over all sixteen GOPRO video recordings that were testified to, shown to
6 the Superior Court and admitted into evidence at the rigged preliminary hearing on April
7 4, 2023, and April 5, 2023, specifically phony LASD-created GOPRO video recordings
8 GL010586 and GL010587 which depicted and displayed AROGANT shutting off his
9 GoPro camera and also showed fake video frame sequences of exactly when he got up
10 out of his seat to stand at the door outside and meet the UBER driver. Instead of granting
11 the COURT ORDER that would have compelled the People and MARK to turn over
12 phony GoPro video recordings depicting and displaying AROGANT shutting off his
13 GoPro camera. Sneakingly without AROGANT present in Superior Court. Prejudiced
14 and biased Michael Villalobos working in collusion with MARK, made a court order for
15 the People to turn over a copy of original GoPro video recordings on a USB flash drive to
16 AROGANT's private investigator Joel Simeone Wyenn. Yet, Michael Villalobos's court
17 order intentionally did not order the People to turn over phony LASD-created GoPro
18 video recordings GL010586 and GL010587 because he knew that those video recordings
19 proved that the state government and County of Los Angeles recklessly, wantonly,
20 maliciously, callously, and willfully falsified video recording evidence in frivolous
21 criminal case GA114055. Michael Villalobos's actions and misconduct recklessly
22 violated AROGANT's Fourteenth Amendment Due Process Clause constitutional rights
23 and AROGANT's Article I, Section 7 California constitutional rights. Michael
24 Villalobos's reckless failure to order the People and MARK to turn over exceedingly
25 impeaching video recording evidence before September 6, 2023, and also after
26 September 6, 2023 is the sole reason why the People and MARK were able to recklessly,
27
28

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 maliciously, wantonly, callously, and willfully present to a criminal State of California
2 Superior Court phony LASD-created GOPRO video recordings GL010586 and
3 GL010587 that falsely depicted AROGANT shutting off his GOPRO camera, meeting
4 with an UBER driver, and walking to the front door of Hutton's home and looking
5 outside, false and manipulated video recording evidence that was used for the sole
6 purpose of incarcerating AROGANT beyond February 2, 2024 without legal justification
7 and probable cause, to the Superior Court on February 2, 2024.
8
9

10
11 On or about October 5, 2023, AROGANT filed a nearly thirty-page verified
12 motion to compel requesting that the Superior Court order the People and MARK to turn
13 over and disclose a copy of phony GOPRO video recordings that depicted AROGANT
14 getting up out of his seat to meet UBER driver and that showed AROGANT shutting off
15 his GOPRO camera while being inside of Jennifer Hutton-Heger's (**hereinafter "Hutton"**) home. The Superior Court and Michael Villalobos recklessly, willfully,
16 wantonly, maliciously, and callously violated AROGANT's United States Fourteenth
17 Amendment constitutional rights and California constitutional rights by denying
18 AROGANT's motion to compel without holding a hearing at all, and by refusing to
19 ORDER that People turn over and disclose a copy of phony GOPRO video recordings
20 showing AROGANT meeting UBER driver and that depicted and displayed AROGANT
21 shutting off his GoPro camera.
22
23
24
25

26 On or about December 11, 2023, AROGANT appeared in Alhambra Superior
27 Court requesting that the Court review his REAL GOPRO video recordings and his
28 request was denied.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 On January 12, 2024, AROGANT filed a motion to withdraw his guilty plea and
2 request for evidentiary hearing so that his original GOPRO video recordings could be
3 played before the Superior Court in hopes of exonerating himself.
4

5
6 On February 2, 2024, rogue, racist, biased, dishonest, prejudiced, and corrupt
7 County of Los Angeles deputy district attorney Brian MARK Rosenberg (SBN # 291501)
8 testified before the Alhambra Superior Court while working in collusion with racist
9 deputy district attorney Victor Manuel Rodriguez (SBN # 156150) who then
10 simultaneously showed the Superior Court phony GOPRO video recordings GL010586
11 and GL010587, both of which since the date of frivolous criminal case GA114055 being
12 initiated on February 23, 2023. have recklessly, willfully, wantonly, maliciously, and
13 callously never been turned over to co-counsel Neil Opdahl-Lopez, private investigator
14 Carlos Anthony Jackson, private investigator Joel Simeone Wyenn, and/or racist expert
15 witness Thomas Leo Guzman-Sanchez. At the hearing, MARK told the Superior Court
16 while sworn under oath that phony LASD-created GOPRO video recording GL010586
17 showed AROGANT shutting off his GOPRO camera. At the hearing MARK asked
18 AROGANT a question on cross-examination: "How did you get to that door right
19 there?"; during the playing of phony GOPRO video recording GL010587 which falsely
20 shows AROGANT walking to the front door of Hutton's home and standing in front of
21 her front door while it was open. The real reason for MARK's testimony is so that he and
22 the People could extinguish the declaration of Neil Opdahl-Lopez (SBN # 277596) that
23 real GOPRO video recordings reviewed by him did not show AROGANT committing
24 any crime or shutting off his GOPRO camera at any time. Thus, pursuant to California
25 State Bar Rules of Professional Conduct Rule 3.8—Special Responsibilities of a
26 Prosecutor, George Gascon, Victor Manuel Rodriguez, and even Robert Bonta all had a
27 duty and responsibility to remedy AROGANT'S criminal conviction and overturn it
28

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 themselves. All emailed County of Los Angeles and State of California criminal
2 attorneys' reckless failure to abide by Rule 3.8 proves by clear and convincing evidence
3 that each of the Defendants sued in the Eastern District of California and the Northern
4 District of California, were correctly and rightfully sued.
5

6
7 At the hearing on February 2, 2024, the People and MARK were able to convince
8 prejudiced judicial officer Michael Villalobos that the People's LASD GOPRO video
9 recordings were authentic and AROGANT's real GOPRO video recordings were spliced
10 and manipulated by AROGANT himself after his GOPRO camera was returned to him in
11 Superior Court on October 17, 2023.
12

13 14 **III. STATEMENT OF FACTS**

15 On December 2, 2002, California State Assembly introduced bill AB-49, an act to
16 amend Section 13848.6 of the Penal Code, relating to crime whose LEGISLATIVE
17 COUNSEL'S DIGEST provided:
18

19
20 AB 49, as introduced, Simitian. Crimes.

21 Existing law establishes the High Technology Theft Apprehension and Prosecution
22 Program Trust Fund, and specifies the purposes for which the moneys in the fund may be
23 used. Funding is contingent upon appropriation by the Legislature, as provided. Existing
24 law establishes the High Technology Crime Advisory Committee, composed of members
25 representing various governmental agencies and professional organizations, appointed by
26 the Executive Director of the Office of Criminal Justice Planning to create a written
27 strategy for addressing high technology crime and advising on the appropriate
28 disbursement of funds from the High Technology Theft Apprehension and Prosecution
Program Trust Fund to regional task forces.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 This bill would, expand the goals for law enforcement attention as identified by the
2 committee to include the apprehension and prosecution of individuals and groups
3 engaged in unlawful access, disruption, or destruction of public utilities or other state
4 infrastructure. This bill would also create the California Cyber Crimes Task Force which
5 would be comprised of each regional task force funded by the High Technology Theft
6 Apprehension and Prosecution Program. In addition, this bill would provide that the
7 committee would annually review the effectiveness of the California Cyber Crimes Task
8 Force.
9
10

11
12 Vote: majority. Appropriation: no. Fiscal committee: yes.
13 State-mandated local program: no.
14
15

16 THE PEOPLE OF THE STATE OF CALIFORNIA DO ENACT AS FOLLOWS:
17

18 **SECTION 1. Section 13848.6 of the Penal Code is amended to read:**
19

20 13848.6. (a) The High Technology Crime Advisory Committee is
21 hereby established for the purpose of formulating a comprehensive
22 written strategy for addressing high technology crime throughout the
23 state and to advise the Office of Criminal Justice Planning on the
24 appropriate disbursement of funds to regional task forces.
25

26
27 (b) This strategy shall be designed to be implemented through
28 regional task forces. In formulating that strategy, the committee
shall identify various priorities for law enforcement attention,
including the following goals:

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 (1) To apprehend and prosecute criminal organizations, networks,
2 and groups of individuals engaged in the following activities:
3

4
5 (A) Theft of computer components and other high technology
6 products.
7

8 (B) Violations of Penal Code Sections 211, 350, 351a, 459, 496,
9 537e, 593d, and 593e.
10

11
12 (C) Theft of telecommunications services and other violations of
13 Penal Code Sections 502.7 and 502.8.
14

15 (D) Counterfeiting of negotiable instruments and other valuable
16 items through the use of computer technology.
17

18
19 (E) Creation and distribution of counterfeit software and other
20 digital information, including the use of counterfeit trademarks to
21 misrepresent the origin of that software or digital information.
22

23
24 (2) To apprehend and prosecute individuals and groups engaged in
25 the unlawful access, destruction, or unauthorized entry into and use
26 of private, corporate, or government computers and networks,
27 including wireless and wireline communications networks and law
28 enforcement dispatch systems, and the theft, interception,
manipulation, destruction, and unauthorized disclosure of data stored
within those computers.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1
2
3 (3) To apprehend and prosecute individuals and groups engaged in
4 the theft of trade secrets.

5
6 (4) To investigate and prosecute high technology crime cases
7 requiring coordination and cooperation between regional task forces
8 and local, state, federal, and international law enforcement
9 agencies.
10

11
12 *(5) To apprehend and prosecute individuals and groups engaged in*
13 *the unlawful access, disruption, or destruction of public utilities*
14 *or other state infrastructure.*

15 (c) The Executive Director of the Office of Criminal Justice
16 Planning shall appoint the following members to the committee:

- 17
18 (1) A designee of the California District Attorneys Association.
19 (2) A designee of the California State Sheriffs Association.
20 (3) A designee of the California Police Chiefs Association.
21 (4) A designee of the Attorney General.
22 (5) A designee of the California Highway Patrol.
23 (6) A designee of the High-Tech Criminal Investigators Association.
24 (7) A designee of the Office of Criminal Justice Planning.
25 (8) A designee of the American Electronic Association to represent California computer
26 system manufacturers.
27 (9) A designee of the American Electronic Association to represent
28 California computer software producers.
(10) A designee of the California Cellular Carriers Association.
(11) A representative of the California Internet industry.
(12) A designee of the Semiconductor Equipment and Materials
International.
(13) A designee of the California Cable Television Association.
(14) A designee of the Motion Picture Association of America.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 (15) A designee of either the California Telephone Association or
2 the California Association of Long Distance Companies. This position
3 shall rotate every other year between designees of the two
4 associations.

5 (16) ~~A designee of the Science and Technology Agency, if~~
6 ~~Senate Bill 1136 is enacted, and, as enacted, creates the Science and~~
7 ~~Technology Agency, otherwise, a designee of the Department of~~
8 ~~Information Technology.~~

9 ~~—(17) A representative of the California banking~~
10 ~~industry.~~

11
12 (d) The Executive Director of the Office of Criminal Justice
13 Planning shall designate the Chair of the High Technology Crime
14 Advisory Committee from the appointed members.
15

16
17 (e) The advisory committee shall not be required to meet more than
18 12 times per year. The advisory committee may create subcommittees
19 of its own membership, and each subcommittee shall meet as often as
20 the subcommittee members find necessary. It is the intent of the
21 Legislature that all advisory committee members shall actively
22 participate in all advisory committee deliberations required by this
23 chapter.
24

25
26 Any member who, without advance notice to the executive director and without
27 designating an alternative representative, misses three scheduled meetings in any
28 calendar year for any reason other than severe temporary illness or injury (as determined
by the Executive Director of the Office of Criminal Justice Planning) shall

1 automatically be removed from the advisory committee. If a member wishes to send an
2 alternative representative in his or her place, advance written notification of this
3 substitution shall be presented to the executive director. This notification shall be
4 required for each meeting the appointed member elects not to attend.
5
6

7 Members of the advisory committee shall receive no compensation for their services,
8 but shall be reimbursed for travel and per diem expenses incurred as a result of attending
9 meetings sponsored by the Office of Criminal Justice Planning under this chapter.
10
11

12
13 (f) The executive director, in consultation with the High Technology Crime Advisory
14 Committee, shall develop specific guidelines and administrative procedures for the
15 selection of projects to be funded by the High Technology Theft Apprehension and
16 Prosecution Program, which guidelines shall include the following selection criteria:
17
18

19 (1) Each regional task force that seeks funds shall submit a
20 written application to the committee setting forth in detail the
21 proposed use of the funds.
22
23

24 (2) In order to qualify for the receipt of funds, each proposed
25 regional task force submitting an application shall provide written
26 evidence that the agency meets either of the following conditions:
27
28

(A) The regional task force devoted to the investigation and
prosecution of high technology-related crimes is comprised of local
law enforcement and prosecutors, and has been in existence for at

1 least one year prior to the application date.

2
3
4 (B) At least one member of the task force has at least three years
5 of experience in investigating or prosecuting cases of suspected
6 high technology crime.

7
8
9 (3) *Each regional task force shall be identified by a name*
10 *that is appropriate to the area that it serves.* In order to
11 qualify for funds, a regional task force shall be comprised of local

12
13 law enforcement and prosecutors from at least two counties. At the time
14 of funding, the proposed task force shall also have at least one investigator
15 assigned to it from a state law enforcement agency.

16
17 Each task force shall be directed by a local steering committee
18 composed of representatives of participating agencies and members of
19 the local high technology industry.

20
21
22 (4) The California Cyber Crimes Task Force shall be comprised
23 of each regional task force developed pursuant to this subdivision.

24
25 (5) Additional criteria that shall be considered by the
26 advisory committee in awarding grant funds shall include, but not be
27 limited to, the following:

28
(A) The number of high technology crime cases filed in the prior
year.

1
2
3 (B) The number of high technology crime cases investigated in the
4 prior year.

5
6 (C) The number of victims involved in the cases filed.

7
8 (D) The total aggregate monetary loss suffered by the victims,
9 including individuals, associations, institutions, or corporations,
10 as a result of the high technology crime cases filed, and those under
11 active investigation by that task force.
12

13 —(5)

14
15 (6) Each regional task force that has been awarded funds
16 authorized under the High Technology Theft Apprehension and
17 Prosecution Program during the previous grant-funding cycle, upon
18 reapplication for funds to the committee in each successive year,
19 shall be required to submit a detailed accounting of funds received
20 and expended in the prior year in addition to any information
21 required by this section. The accounting shall include all of the
22 following information:
23
24

25
26 (A) The amount of funds received and expended.

27
28 (B) The use to which those funds were put, including payment of
salaries and expenses, purchase of equipment and supplies, and other
expenditures by type.

(C) The number of filed complaints, investigations, arrests, and convictions that resulted from the expenditure of the funds.

(g) The committee shall annually review the effectiveness of the ~~regional task forces created~~ *the California Cyber Crimes Task Force* in deterring, investigating, and prosecuting high technology crimes and provide its findings in a report to the Legislature and the Governor. This report shall be based on information provided by the regional task forces in an annual report to the committee which shall detail the following:

(1) Facts based upon, but not limited to, the following:

(A) The number of high technology crime cases filed in the prior year.

(B) The number of high technology crime cases investigated in the prior year.

(C) The number of victims involved in the cases filed.

(D) The number of convictions obtained in the prior year.

(E) The total aggregate monetary loss suffered by the victims, including individuals, associations, institutions, corporations, and other relevant public entities, according to the number of cases filed, investigations, prosecutions, and convictions obtained.

(2) An accounting of funds received and expended in the prior year, which shall include all of the following:

(A) The amount of funds received and expended.

(B) The uses to which those funds were put, including payment of salaries and expenses, purchase of supplies, and other expenditures of funds.

(C) Any other relevant information requested.

1 See AB-49 (2002) below.

2 [http://www.leginfo.ca.gov/pub/03-04/bill/asm/ab_0001-](http://www.leginfo.ca.gov/pub/03-04/bill/asm/ab_0001-0050/ab_49_bill_20021202_introduced.html)
3 [0050/ab_49_bill_20021202_introduced.html](http://www.leginfo.ca.gov/pub/03-04/bill/asm/ab_0001-0050/ab_49_bill_20021202_introduced.html)
4

5
6 See AB-49 2002 California Senate Bill attached to **Verified Appendix of Exhibits,**
7 **Exhibit 1.**
8

9
10 On August 19, 2011, the County of Los Angeles Sheriff's Department
11 Headquarters responded to Civil Grand Jury Report recommendations by stating the
12 following:
13

14 RESPONSE: The Los Angeles County Sheriff's Department agrees with this
15 recommendation. Currently, LASD operates a regional high tech task force (Southern
16 California High Tech Task Force-SCHTTF) that investigates computer related crimes
17 and also provides forensic examinations of technical equipment and software related to
18 cyber crimes. SCHTTF is currently funded by a state grant through this current fiscal
19 year.
20
21

22 See now

23 [https://file.lacounty.gov/SDSInter/bos/bc/164642_CivilGrandJuryFinalReportResponse2](https://file.lacounty.gov/SDSInter/bos/bc/164642_CivilGrandJuryFinalReportResponse2010-11.pdf)
24 [010-11.pdf](https://file.lacounty.gov/SDSInter/bos/bc/164642_CivilGrandJuryFinalReportResponse2010-11.pdf)
25
26

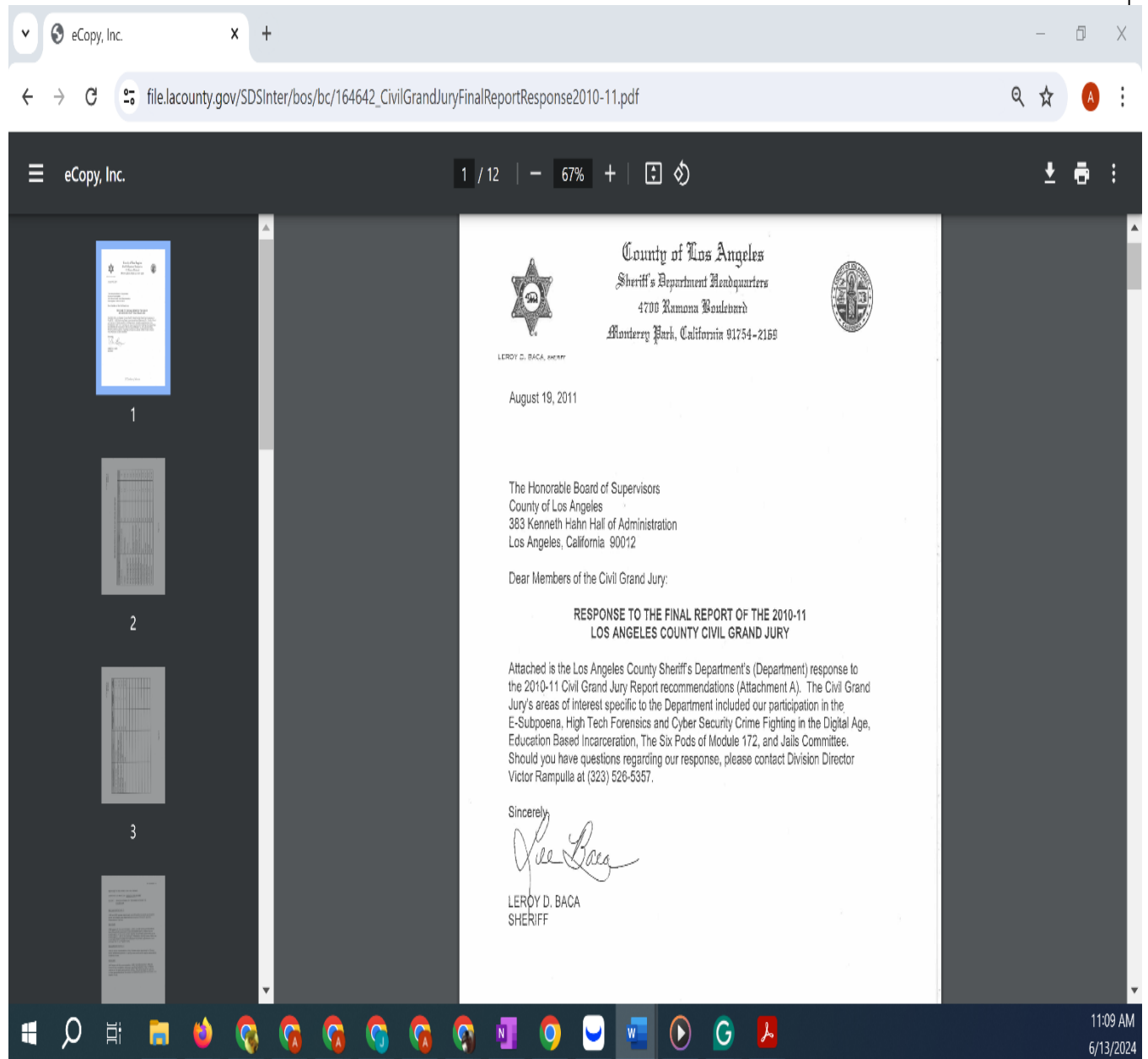
27 See **Verified Appendix of Exhibits, Exhibit 2.** See also the first page of the County of
28 Los Angeles Sheriff's Department Headquarters Response to the Final Report of the
2010-11

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

Los Angeles County Civil Grand Jury, signed by former County of Los Angeles Sheriff's Department peace officer Sheriff Leroy D. Baca.



VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1
2
3
4 On February 21, 2023, Arogant Hollywood (hereinafter “AROGANT”) was falsely
5 arrested by LASD Temple City Peace Officers for making criminal threats.
6

7
8 On February 21, 2023, shortly after arriving at Temple City adult detention center,
9 Hollywood told rogue detective peace officer Billy Khounthavong and his superior
10 sergeant Richard Lewis that if they brought him his mobile phone and GoPro camera he
11 could present to them audio and video evidence that would prove he did not make any
12 criminal threats.
13

14
15 On February 22, 2023, rogue and corrupt LASD peace officer Billy Khounthavong
16 and his superior Richard Lewis recklessly conspired to violate his civil rights by
17 disposing of his Samsung Galaxy S21 Ultra mobile phone, which Hollywood told them
18 contained audio recordings and text messages that would exonerate him.
19

20
21 On February 22, 2023, rogue peace officer Billy S. Khounthavong filed a bogus
22 police report alleging that a search warrant for AROGANT’s GoPro camera was issued
23 by the dishonest, racist, and biased judicial officer Suzette Clover. The search warrant
24 was so bogus that AROGANT never received a certified copy of it despite requesting it
25 on numerous occasions before the Superior Court and prejudiced judicial officer Michael
26 Villalobos. The bogus warrant was alleged to have been electronically filed, yet it did not
27 have the words duplicate original written on it, and it did not have the execution date and
28 time written on it. AROGANT was never served, and he did not receive a copy of Billy

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 Khounthavong's bogus search warrant until March 2023. There were a few obvious signs
2 that proved that Billy S. Khounthavong's
3 search warrant was a phony. (1) The phony search warrant had no search warrant number
4 on it. (2) The search warrant failed to show a Superior Court electronic stamp in the
5 following format:
6
7

8
9 **Electronically FILED by**
10 **Superior Court of California,**
11 **County of Los Angeles**
12 **02/22/2023 _____ PM**
13 **David W. Slayton,**
14 **Executive Officer/Clerk of Court**
15 **CLERK NAME HERE, Deputy Clerk**

16 (3) No search warrant return was ever filed with the Superior Court and attached to
17 the phony search warrant that was given to AROGANT in Superior Court by MARK in
18 late March 2023. See now rogue peace officer Billy S. Khounthavong's phony search
19 warrant attached to Verified Appendix of Exhibits, Exhibit, and attached herein to this
20 legal brief below.
21
22
23
24
25
26
27
28

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

LASD File #:

SW NO. _____

SUPERIOR COURT OF CALIFORNIA
County of Los Angeles
SEARCH WARRANT



Detective Billy Khounthavong #502190 swears under oath that the facts expressed by him in the attached and incorporated Statement of Probable Cause are true and that based thereon he has probable cause to believe and does believe that the articles, property, electronic communications, and data described below are lawfully seizable pursuant to Penal Code Section 1524 et seq., as indicated below, and are now located at the location(s) set forth below. Wherefore, Affiant requests that this Search Warrant be issued.


(Signature of Affiant)

SEALING ORDER REQUESTED: YES ☒ NO
NIGHT SEARCH REQUESTED: YES ☒ NO

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY PEACE OFFICER IN THE COUNTY OF LOS ANGELES: proof by affidavit, having been this day made before me by Detective Billy Khounthavong, finds that there is probable cause to believe that the property and/or person described herein may be found at the locations set forth herein and is lawfully seizable pursuant to Penal Code Section 1524 et seq., as indicated below by X (s) in that:

- ___ When the property was stolen or embezzled [§1524(a)(1) Penal Code];
- ___ When the property or things were used as the means of committing a felony [§1524(a)(2) Penal Code];
- ☒ When the property or things to be seized consist of an item or constitute evidence that tends to show that a felony has been committed, or tends to show that a particular person has committed a felony [§1524(a)(4) Penal Code];
- ___ When the property or things are in the possession of any person with the intent to use them as a means for committing a public offense, or in the possession of another to whom he or she may have delivered them for the purpose of concealing them or preventing their discovery [§1524(a)(3) Penal Code];
- ___ There is a warrant to arrest a person [§1524(a)(6) Penal Code];
- ___ When a provider of electronic communication service or remote computing service has records or evidence, as specified in Section 1524.3, showing that property was stolen or embezzled constituting a misdemeanor, or that property or things are in the possession of any person with the intent to use them as a means of committing a misdemeanor public offense, or in the possession of another to whom he or she may have delivered them for the purpose of concealing them or preventing their discovery.
- ☒ Will assist in locating an individual who has committed or is committing a felony [§1524(a)(12) Penal Code];

YOU ARE THEREFORE COMMANDED TO SEARCH

(1) Digital Video Recorder, GoPro, black in color, belonging to Arrogant Hollywood, evidence booked as property located at Temple Sheriff's Station 8838 E. Las Tunas Dr. Temple City, CA 91780

FOR THE FOLLOWING PROPERTY:

All data and/or content that constitutes evidence and instrumentalities of criminal threats, February 21, 2023.

Rev. 01-11-18 '02

Page 1 of 1

VERIFIED LEGAL BRIEF

Arrogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: arroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 (4) Billy S. Khounthavong and MARK's phony search warrant was presented to
2 the Superior Court while no mandatory LASC COUNTYWIDE WARRANT SYSTEM
3 INITIAL CASE FILING FORM (LASC CRIM 126, Revised in January 2020. Without
4 mandatory form, LASC 126 never being filed, the People and Billy Khounthavong's case
5 should have never been filed, and they also illegally seized, copied, altered, and searched
6 AROGANT's GoPro camera and AROGANT's GoPro camera video recordings stored
7 on his camera's Micro SD card. See Verified Appendix of Exhibits, Exhibit. Also, see
8 LASC mandatory judicial form LASC CRIM 126.
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

**COUNTYWIDE WARRANT SYSTEM
INITIAL CASE FILING FORM**

**MUST PRINT OR TYPE
FIELDS IN BOLD ARE REQUIRED**

If a search warrant was executed that contributed to filing of this case, please provide the search warrant number on the line below.

Search Warrant Number _____

(Filing Name) First _____ Mid _____ Last _____ Sfx _____

Address _____ City _____

Zip _____ State _____

DOB _____ Sex _____ Hair _____ Eyes _____ Hgt _____ Wgt _____ Race _____

ID #S OLN _____ ST _____ LPD _____

MAIN _____ VLN _____ ST _____

CII _____ BKG _____

OTHER #S FBI _____ CIT _____

OCA _____

AKA First _____ Mid _____ Last _____ Sfx _____

LEA _____ Vio City _____

Inv Name/Unit _____ Phone (_____) _____

Filing Charge(s) _____

Arrest Charge(s) _____

Date of Arrest _____

(Arrest Name) First _____ Mid _____ Last _____ Sfx _____

(over)

LASC CRIM 126 Rev. 01/20
For Mandatory Use

Reserved for Clerk's File Stamp

CASE NUMBER

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 Of course, falsified legal documents are not a new venture for rogue and dishonest
2 peace officer Billy S. Khounthavong. On December 5, 2013, the United States District
3 Attorney's office for the Central District of California charged him and his brother Benny
4 Khounthavong with making false statements and reports to Flagstar Bank and Bank of
5 America for the purpose of influencing these banks. If Billy Khounthavong would be
6 willing to falsify a federal loan document, surely he would be willing to falsify a Superior
7 Court of California criminal search warrant in which he knew he would have favor by the
8 prejudiced and biased judicial officers of the Northern District of County of Los Angeles.
9 See Verified Appendix of Exhibits, Exhibit. Also attached here below is a true and
10 correct copy of page one of Billy Khounthavong's federal district court complaint in case
11 13-3105M.
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

AO 91 (Rev. 11/82)

CRIMINAL COMPLAINT

UNITED STATES DISTRICT COURT		CENTRAL DISTRICT OF CALIFORNIA	
UNITED STATES OF AMERICA v. BILLY KHOUNTHAVONG, BENNY KHOUNTHAVONG, and JOHNNY KHOUNTHAVONG		DOCKET NO.	13-3105M
		MAGISTRATE'S CASE NO.	FILED CLERK, U.S. DISTRICT COURT DEC - 5 2013 CENTRAL DISTRICT OF CALIFORNIA BY LOCATION DEPUTY
Complaint for violation of Title 18, United States Code, Section 371			
NAME OF MAGISTRATE JUDGE HONORABLE RALPH ZAREFSKY		UNITED STATES MAGISTRATE JUDGE Los Angeles, California	
DATE OF OFFENSE June 2011 to October 2011	PLACE OF OFFENSE Los Angeles County and elsewhere	ADDRESS OF ACCUSED (IF KNOWN) 14595 Meadowbrook Lane, Corona CA	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: [18 U.S.C. § 371] Beginning no later than in or about June 2011, and continuing to at least in or about October 2011, in Los Angeles County, within the Central District of California, and elsewhere, BILLY KHOUNTHAVONG, BENNY KHOUNTHAVONG, and JOHNNY KHOUNTHAVONG conspired to commit an offense against the United States, namely 18 U.S.C. § 1014, by making false statements and reports to Flagstar Bank and Bank of America, N.A., the accounts of which were then insured by the Federal Deposit Insurance Corporation, for the purpose of influencing Flagstar Bank and Bank of America, N.A.			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: (See attached affidavit which is incorporated as part of this Complaint)			
MATERIAL WITNESSES IN RELATION TO THIS CHARGE: N/A			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		SIGNATURE OF COMPLAINANT JASON DALTON 15/ OFFICIAL TITLE Special Agent - FBI	
Sworn to before me and subscribed in my presence,			
SIGNATURE OF MAGISTRATE JUDGE ⁽¹⁾ Jay C. Gandhi		DATE December 5, 2013	

⁽¹⁾ See Federal Rules of Criminal Procedure 3 and 54

AUSA Margaret L. Carter REC: \$100,000 Secured Bond

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 On February 21, 2023, County of Los Angeles rogue peace officer Alex Contreras
2 created a fraudulent and counterfeit probable cause determination declaration in which he
3 stated that the Honorable Jana Seng approved his bogus PCD at approximately 1 p.m., a
4 time she was on her lunch break. But it gets worse. While LASD has its own system for
5 entering PCDs and sending them to the court. There are no records of Contreras' bogus
6 PCD. Also, the fact that Contreras alleged that his PCD was approved, and that probable
7 cause was found non-telephonically was a bald-faced lie. Probable cause is usually found
8 at a preliminary hearing when it's non-telephonic. Additionally, a court reporter was
9 required to transcribe Contreras' non-telephonic probable cause determination
10 declaration. See California Penal Code Section 817, subdivision (g). Additionally, LASD
11 and rogue peace officer A. Contreras willfully and recklessly failed to file a certificate of
12 service with Jana Seng's court after the alleged arrest warrant was approved by her as was
13 mandatory by the California criminal statutes. See California Penal Code Section 817,
14 subdivision (i). LASD and A. Contreras never filed a certificate of service because they
15 knew that their probable cause determination declaration was shammed, bogus,
16 counterfeit, false, forged, and fraudulent. See rogue peace officer Contreras's phony
17 probable cause attached hereto below and marked in Verified Appendix of Exhibits,
18 Exhibit. See also a copy of phony Superior Court of California, County of Los Angeles
19 probable cause determination below.
20
21
22
23
24
25
26
27
28

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES			
PROBABLE CAUSE DETERMINATION (DECLARATION)			
Location Booked: TEM	Booking No.: 6555970	Arrest File No.: 923-02068-0588-339	
Arrestee/Suspect (Last, First, Middle): HOLLYWOOD, ARROGANT		JOB: 12/09/1978	
Arrestee/Suspect's Residential Address: 825 E ORANGE BL PASADENA, CA 91104		Location of Occurrence: 9077 FAIRVIEW AVENUE, SAN GABRIEL, CA 91775	
Booking Charge(s): 422 PC	Misdemeanor <input type="checkbox"/> Felony <input checked="" type="checkbox"/>	Supplemental Holds/Warrants Charges:	
Date/Time of Arrest: 02/21/2023 1030 hrs	48 Hour Expiration Date and Time: 02/23/2023 1030 hrs		
Arresting Agency/Division: 0501 - LASD - TEMPLE PATROL	Arresting Officer(s): CONTRERAS, A.	Employee No.: 636424	
Supervisor(s) Approving: Santana Jr., W. Perez, D.	Employee No.: 484514 499035	Date/Time: 02/21/2023 1253 hrs 02/21/2023 1256 hrs	Contact Phone No.: 626-285-7171 626-285-7171
Facts establishing elements of offense(s)/violation(s). Information identifying/connecting arrestee/suspect by name with the violation(s) listed:			
<p>I contacted the Victim, who stated she locked the garage door to her residence because she was in fear for her life and safety. The Victim stated the Suspect became verbally aggressive when she asked him to leave her residence. The Suspect was attempting to break down the door she locked while stating he was going to kill her. In sustained fear for her life, believing the Suspect would grab a weapon from the garage to carry out the threat, the Victim called 9-1-1.</p> <p>The Victim positively identified the Suspect as the one that threatened to kill her.</p> <p>Based on the above, I arrested the Suspect for the indicated charge.</p>			
<input type="checkbox"/> See attached reports incorporated herein by reference.			
I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.			
Executed on <u>02/21/2023</u> <u>1249</u> hrs in the County of Los Angeles, California. (date) (time)			
e-signed (Signature)		Contreras, A. (Print Name)	636424 (Employee No.)
Telephonic Determination ONLY On _____, I was placed under oath and read the contents of the foregoing, including the contents of any attached reports or declaration, verbatim to the Honorable _____ The Judicial Officer advised me that there () IS () IS NOT probable cause to believe this arrestee has committed a crime. I declare under penalty of perjury that the foregoing is true and correct. Executed in Los Angeles County, California, on _____		Probable Cause Determination On the basis of either reports reviewed and/or officer's declaration I hereby determine that there (x) IS () IS NOT probable cause to believe this arrestee has committed a crime. Seng, J. (e-signed) _____ 02/21/2023 1300 hrs (Judicial Officer's Signature)	
(Signature)		(Employee No.)	(Block Stamp)

CRIM 064 Revised: 10/21/08

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 In addition, rogue peace officer Alex Contreras's County of Los Angeles probable
2 cause determination was absolutely 100% a phony because (1) He recklessly failed to
3 complete the mandatory LASC CRIM 064, which was revised in October 2022 (long
4 before February 21, 2023, false arrest). The reason for the new mandatory judicial form is
5 that it prevents rogue peace officers like Alex Contreras from lying to a Superior Court
6 that they obtained a probable cause determination in a frivolous and unconstitutional
7 felony criminal case that should have never been filed in the first place. In red lettering,
8 the following is written on the LASC mandatory judicial form CRIM 064:
9

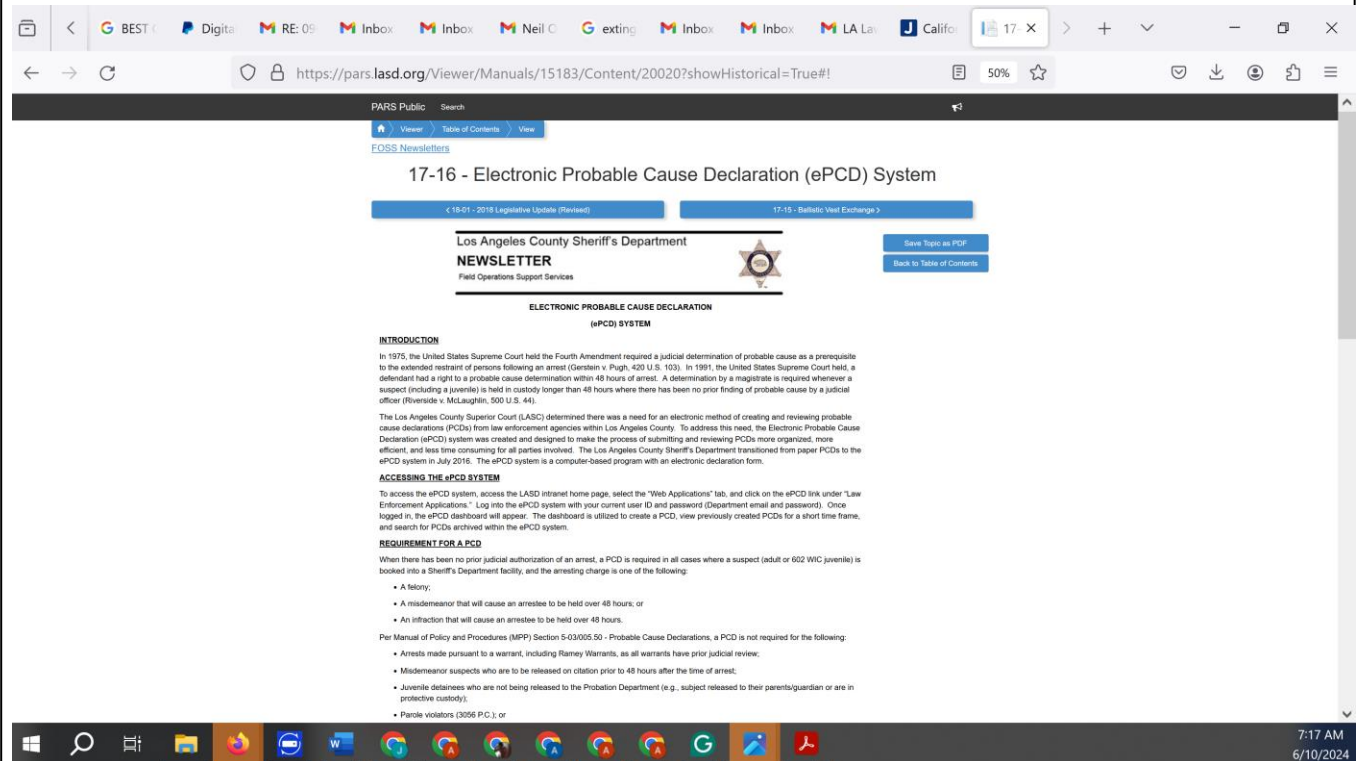
10
11 *Submit via email ONLY upon activation of the ePCD Contingency Plan*
12

13 Further, the mandatory LASC CRIM 064 form states immediately below the
14 submit red lettering the following: Emailed to: email4PCD@lacourt.org
15

16 See Verified Appendix of Exhibits, Exhibit, and also attached herein below a true
17 and correct copy of mandatory LASC CRIM 064 mandatory judicial form for all County
18 of Los Angeles probable cause determinations.
19
20
21
22
23
24
25
26
27
28

(2) Ales Contreras and the County of Los Angeles Sheriff's Department, in addition to violating AROGANT's Fourteenth Amendment Due Process constitutional rights and his Article I, Section 13 constitutional rights, County of Los Angeles peace officers involved with AROGANT's initial criminal investigation recklessly, willfully, maliciously, wantonly, and callously violated Los Angeles County Sheriff's Department electronic probable cause declaration system by not completing the mandatory LASC CRIM 064 mandatory form and emailing phony probable cause to: email4PCD@lacourt.org

See the Verified Appendix of Exhibit, Exhibit , and also the Los Angeles County Sheriff's Department's electronic probable cause declaration system webpage below.



VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

Alex Contreras's misconduct, actions, transgressions, misdoings, and misdeeds created a phony probable cause that was against the County of Los Angeles judicial and police policies, proving by clear and convincing evidence that GA114055 was a foul-played criminal case from the very beginning.

On or about February 23, 2023, rogue and dishonest peace officer detective lying Billy Khounthavong wrongfully and unnecessarily sent AROGANT'S GOPRO HERO 10 action camera to County of Los Angeles Sheriff's Department and Ventura County Sheriff's Office's joint Fraud and Cyber Crimes' Southern California High Tech Task Force so they could illegally manipulate his GOPRO video recordings to make him look guilty of a crime they knew that AROGANT did not commit.

California Commission on Peace Officer Standards and Training Basic Course The Workbook Series proves that Billy Khounthavong's Search Warrant is and was bogus. It also proves that no LASD peace officer had any probable cause whatsoever to confiscate AROGANT's GoPro Camera and Request a Search Warrant to search it. Thus, Billy Khounthavong, Brian Mark Rosenberg, and Richard Lewis must be immediately charged with willfully, recklessly, and wantonly violating California Government Code § 6200.

The California Commission on Peace Officer Standards and Training's Basic Course Workbook Series proves that the County of Los Angeles Sheriff's Department had no probable cause to request a search warrant. The legal document proves Billy Khounthavong, Brian Mark Rosenberg, and Richard Lewis recklessly violated the California Government Code § 6200 by bringing into a State of California criminal Superior Court a bogus and counterfeit forged search warrant that they all knew was

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

never issued by any Pasadena Superior Court judicial officer. The legal document proves that based on Billy Khounthavong and Richard Lewis' peace officer standards training on search warrant policies and procedures, they knew that they were willfully violating numerous California penal code statutes and Arogant Hollywood's Fourth and Fourteenth Amendment constitutional rights by creating a phony search warrant and then committing a federal crime by lying under oath in their police report that it was issued by Pasadena Superior Court while of course, Pasadena Superior Court has no records of ever receiving it!

The California Commission on Peace Officer Standards and Training's Basic Course Workbook Series provides:

Introduction to Warrant Searches, Continued

2-4 LD 16: Chapter 2 – Warrant Searches and Seizures

Benefits of obtaining a search warrant.

As a general rule, the courts have found searches and seizures to be reasonable and therefore lawful when authorized by a valid warrant. The burden is on the defendant to prove the illegality of any search executed with a search warrant. Statutory grounds for a search warrant Penal Code Section 1524 presents the statutory grounds for issuance of a search warrant. When the property or thing... Penal Code Section was stolen or embezzled. 1524(a)(1) was used as the means of committing a felony. 1524(a)(2) is in the possession of any person with the intent to use it as a means of committing a public offense, or in the possession of another to whom the item may have been delivered for the purpose of concealing it or preventing its being discovered. 1524(a)(3) constitutes evidence that tends to show a felony has been committed, or tends to show that a particular person has committed a felony. 1524(a)(4) consists of evidence that tends to

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

show that sexual exploitation of a child (Penal Code 311.1), or the possession of matter depicting sexual conduct of a person under the age of 18 years (Penal Code 311.11), has occurred or is occurring.

1524(a)(5)

See California Commission on Peace Officer Standards and Training, Basic Course Workbook Series, Student Materials, Learning Domain 16, Search and Seizure, Version 4.8, Revised in June 2017, Foreword by current post EXECUTIVE DIRECTOR, MANUEL ALVAREZ, JR. at 2-4, LD 16: Chapter 2-Warrant Searches and Seizures, found on page 35 of 176

Pursuant to POST peace officer manual on page 35 of 176. Billy Khounthavong and Richard Lewis knew that they did not have probable cause to confiscate Hollywood's entirely exculpatory GOPRO camera and request that a judge issue a search warrant.

The California Commission on Peace Officer Standards and Training's Basic Course Workbook Series provides:

Probable Cause to Search

LD 16: Chapter 2 – Warrant Searches and Seizures 2-7 Introduction Before they can obtain a search warrant, peace officers must be able to provide a judge with specific facts that meet the Fourth Amendment's requirement of probable cause.

Constitutional requirement of probable cause

The Fourth Amendment of the U.S. Constitution clearly states:

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched and the

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

persons or things to be seized.

Probable cause to search

In the search warrant context, probable cause to search means enough credible information to provide a fair probability that the object or person the peace officers seek will be found at the place they want to search. Officer training and experience it is possible for an activity which might otherwise appear innocent to the general public to amount to probable cause to a peace officer. A peace officer's training and experience may enter the equation for determining probable cause. Facts must be seen and weighed as understood by a reasonable officer. Collective knowledge Probable cause may be based on the collective knowledge of all the officers involved in an investigation, and all the inferences which may reasonably be drawn from this information, with that particular officer's training and experience.

Id at LD 16: Chapter 2-Warrant Searches and Seizures, found on page 38 of 176

On page 4 of his bogus search warrant Billy Khounthavong states the following:

After the suspect was arrested and detained at the Temple City Sheriff's station jail. I conducted an interview with him. While speaking with him, the suspect continuously referenced he had the argument between him and the victim, recorded on his "GOPRO". He also referenced the GoPro" was recording intermittently up until the arrest. The digital video recorder was on his person (s) while the recording took place.

See now Billy Khounthavong's bogus search warrant at page 4 of 6.

Based on the above statement there was zero probable cause for the issuance of any search warrant. Just because AROGANT told Khounthavong that he had recorded the confrontation with Jennifer Hutton-Heger did not mean that he was admitting that he had done anything wrong, specifically making a criminal threat. Further, the original

1 GOPRO video of February 21, 2023, that LASD manipulated and tainted proves that
2 Billy Khounthavong and Richard Lewis knew that they did not have probable cause to
3 request any search warrant be issued to search AROGANT's GoPro camera. See the
4 REAL GOPRO VIDEO here:
5

6
7 <https://youtu.be/LjJa3ZezGdk?si=mBBISuPA0qiQircp>
8
9

10 On page 5 of 6 of Billy Khounthavong's bogus search warrant, he stated the following:
11

12
13 *It should be noted from prior law enforcement contacts with the suspect, the suspect*
14 *was well known to have the "GoPro" in his possession and made it a habit to have the*
15 *digital recorder recording.*
16
17

18
19
20 Oh really? What Khounthavong meant was that the County of Los Angeles Sheriff's
21 Department was well aware that AROGANT was recording because people constantly
22 accused him of committing crimes.
23

24 See now June 21, 2021, video of Hollywood being arrested by corrupt and dirty LASD
25 Temple City here:
26

27 https://www.instagram.com/p/CQK0dL7H_aB/
28

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 See now a GoPro video recording based on a false criminal threats allegation made
2 by the white devil AROGANT was arguing within the video. The false arrest was made
3 by dirty and corrupt LASD Temple City peace officers yet again:
4

5 <https://www.instagram.com/p/CLS-Xx1HoAv/>
6
7
8

9 Here is yet another video of LASD Temple City PIGZ either harassing or arresting
10 AROGANT:
11

12 <https://www.instagram.com/p/CQKLE6RndAV/>
13
14

15 Thus, based on Billy Khounthavong's knowledge of AROGANT recording himself not
16 committing crimes, there was no probable cause for Billy Khounthavong's bogus search
17 warrant based on him telling the Court that AROGANT made it a habit to record on his
18 GoPro camera. Further, those statements alone did not constitute probable cause for the
19 issuance of a search warrant for AROGANT's GoPro camera.
20
21

22 On page 6 of Billy Khounthavong's bogus search warrant, he committed perjury,
23 violated state and federal criminal statutes, and violated AROGANT's civil rights by
24 typing the following false information and statements:
25

26 ***"Your affiant believes the recording equipment was used to communicate information***
27 ***pertaining to this case. Your affiant is further aware that recording devices are often***
28 ***used to communicate /share with other parties and to store information. Your affiant***
believes the digital video recorder will contain the information which could identify the
suspect committing the criminal threats."

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

LIAR

Based on Billy Khounthavong's illegal review of AROGANT's GoPro camera video recordings before he authored his bogus search warrant he had already reviewed all the videos recorded on February 21, 2023, on AROGANT's GoPro camera. Therefore, Billy Khounthavong knew that AROGANT's GoPro camera's video recordings would not show AROGANT making a criminal threat. Based on the actions of Billy Khounthavong, based on his false statements made in his bogus search warrant affidavit, and based on the evidence shown in the original nearly fifteen-minute video recording recorded on the early morning of February 21, 2023, Billy knew that LASD HAD zero probable cause to search AROGANT's GoPro camera.

Therefore, Billy Khounthavong knew that AROGANT's GoPro camera's video recordings would not show AROGANT making a criminal threat. Based on the actions of Billy Khounthavong, based on his false statements made in his bogus search warrant affidavit, and based on the evidence shown in the original nearly fifteen-minute video recording recorded on the early morning of February 21, 2023, Billy knew that LASD had zero probable cause to believe that AROGANT had made a criminal threat on February 21, 2023, and, after Khounthavong and Richard Lewis should have released AROGANT, returned his Samsung Galaxy S21 mobile phone, and returned AROGANT's GoPro camera. Instead, the biased and racist LASD Temple City peace officers illegally confiscated AROGANT'S GoPro camera, and recklessly, wantonly, willfully, callously, and willfully sent it to the Los Angeles County Sheriff's Department Southern California High Tech Task Force so peace officers there could manipulate AROGANT's GoPro camera, and Billy S. Khounthavong and Richard Lewis recklessly disposed of

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 AROGANT's mobile phone because they knew it contained on it exculpatory audio
2 recordings and text messages that would have exonerated Hollywood, in furtherance of
3 Los Angeles County's conspiracy to frame Hollywood for a violent and serious crime it
4 knew he did not commit.
5

6
7 The California Commission on Peace Officer Standards and Training's Basic Course
8 Workbook Series provides:
9

10
11 **Probable cause to search vs. probable cause to arrest**
12

13 Probable cause to search differs in content, but not in degree of certainty, from
14 probable cause to arrest.

15 Search Warrants Arrest Warrants
16

17 Peace officers must articulate probable cause that: a crime has been committed,
18 and evidence concerning the crime or the identity of the perpetrator is located at the place
19 to be searched. Peace officers must articulate probable cause that: a crime has been
20 committed, and the individual to be arrested committed that crime.
21

22
23 **Id. at LD 16: Chapter 2-Warrant Searches and Seizures, found on page 39 of 176**
24

25 ***The point of the Fourth Amendment, which often is not grasped by zealous officers,***
26 ***is not that it denies law enforcement the support of usual inferences which reasonable***
27 ***men draw inferences which reasonable men draw from evidence. Its protection consists***
28 ***in requiring that these inferences be drawn by a neutral and detached magistrate***
instead of being judged by the officer engaged in the often competitive enterprise of
ferreting out crime.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 *Johnson v. United States*, 333 U.S. 68 S.Ct. 367, 92 L.Ed.2d 436 (1947) at 13-14

2
3 That philosophy later reflected in the Fourth Amendment. And as the early American
4 decisions, both before and immediately after its adoption show, common rumor or
5 report, suspicion, or even "strong reason to suspect" was not adequate to support a
6 warrant for arrest.

7
8 *Henry v. United States*, 361 U.S. 98, 80 S.Ct. 168, 4 L.Ed.2d 134 (1959)

9
10 See also *Dunaway v. New York*, 442 U.S. 200, 99 S.Ct. 2248, 60 L.Ed.2d 824 (1979)
11 at 212 quoting *Henry v. United States*, *supra*, at 101
12
13

14 Lying Billy could not articulate probable cause that AROGANT'S GoPro video
15 recording would show him committing a felony. The statements made by AROGANT to
16 Billy Khounthavong pointed to AROGANT'S innocence, not guilt. Thus, pursuant to
17 United States Supreme Court cases, California penal codes statutes, and the California
18 Commission on Peace Officer Standards and Training manual in Chapter 2-Warrant
19 Searches and Seizures, found on page 39 of 176. Billy Khounthavong did not have
20 probable cause to confiscate AROGANT'S GoPro camera.
21
22

23 Thus, pursuant to United States Supreme Court cases, California penal codes
24 statutes, and the California Commission on Peace Officer Standards and Training manual
25 in Chapter 2-Warrant Searches and Seizures, found on page 39 of 176. Billy
26 Khounthavong did not have probable cause to articulate and believe that AROGANT'S
27 GoPro camera would show him committing a felony.
28

Thus, pursuant to United States Supreme Court cases, California penal codes
statutes, and the California Commission on Peace Officer Standards and Training Manual

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1
2
3
4 in Chapter 2-Warrant Searches and Seizures, found on page 39 of 176.
5

6 Billy Khounthavong did not have probable cause to articulate and believe that
7 AROGANT'S GoPro camera would show him committing a felony based on the false and
8 perjured statements he typed on his bogus search warrant.
9

10
11 Thus, pursuant to United States Supreme Court cases, California penal codes
12 statutes, and the California Commission on Peace Officer Standards and Training manual
13 in Chapter 2-Warrant Searches and Seizures, found on page 39 of 176. Billy
14 Khounthavong did not have probable cause to articulate and believe that AROGANT'S
15 GoPro camera would show him committing a felony.
16

17
18 Thus pursuant to United States Supreme Court cases, California penal codes
19 statutes, and the California Commission on Peace Officer Standards and Training manual
20 in Chapter 2-Warrant Searches and Seizures, found on page 39 of 176. Billy
21 Khounthavong's bogus search warrant affidavit and illegal confiscation of AROGANT'S
22 GoPro camera were based upon nothing more than common rumor or report, and
23 suspicion
24

25
26
27 The California Commission on Peace Officer Standards and Training's Basic Course
28 Workbook Series provides:

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1
2 **Elements of probable cause to search**

3
4 To establish probable cause, peace officers must directly or circumstantially
5 show that certain required elements exist. The following table identifies the
6 three required elements of probable cause to search. To establish probable cause to
7 search, there must be a fair probability that...

8 **Rationale Examples**

9
10 a crime occurred. There must be at least a fair probability that a crime has occurred or, in
11 some cases, will occur. Person sold drugs to an undercover officer.

12
13 · A person purchased a large amount of chemicals that could be used for a clandestine lab
14

15
16 ***Id.* at 2-10 LD 16: Chapter 2-Warrant Searches and Seizures, found on page 39 of**
17 **176.**

18
19 Billy Khounthavong and Richard Lewis wantonly and recklessly violated their oath of
20 office pursuant to 11 CCR § 1013, Code of Ethics by keeping AROGANT in jail and
21 then authoring a bogus and fabricated search warrant affidavit while they both knew that
22 AROGANT'S GoPro camera did not show him committing a felony, and they knew after
23 the time of writing false statements in their illegal and unconstitutional police report that
24 they had zero probable cause to believe that there was any inculpatory evidence, direct
25 evidence, or circumstantial evidence to support their false statements that Hollywood's
26 GoPro camera would show him committing a felony. For upon which no reasonable
27 inferences could have been drawn that AROGANT'S GoPro camera would show him
28 making a criminal threat.

Based upon Billy Khounthavong and Richard Lewis' POST TRAINING OF

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

2-10 LD 16: Chapter 2-Warrant Searches and Seizures, found on page 39 of 176. They both knew that their actions violated their oath of office and Los Angeles County Sheriff's Department search warrant procedures and policies.

The California Commission on Peace Officer Standards and Training's Basic Course Workbook Series provides:

Probable Cause to Search, Continued

Elements of probable cause to search
(continued)

To establish probable cause to search, there must be a fair probability that...

Rationale Examples

evidence pertaining to the crime exists, and Officers must establish that evidence of a crime exists. This can be accomplished by direct evidence, circumstantial evidence, or by reasonable inference. Information from a victim that a gun was displayed during a robbery. Stolen property. Existence of items commonly used to commit or facilitate a crime (e.g., drug paraphernalia). the evidence is located at the place to be searched. Officers must establish that the evidence was taken to, or produced at, the place to be searched. This can be accomplished by direct evidence, circumstantial evidence, or by reasonable inference. A reliable source saw the evidence at the location. The person goes directly to a location after a crime has been committed.

· The location is one where a criminal might likely hide incriminating evidence.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

Id. at LD 16: Chapter 2-Warrant Searches and Seizures, found on page 40 of 176

Pursuant to L16 Chapter 2, page 40 of 176, *supra*, Billy Khounthavong, and Richard Lewis knew shortly after AROGANT was arrested that there was no direct or circumstantial evidence that AROGANT's GoPro camera would show him committing evidence. Khounthavong and Lewis believed the opposite, that AROGANT's GoPro camera would prove that he did not commit a crime. Proof of this is the fact that while LASD Fraud and Cyber Crimes Bureau's Southern California High-Tech Task Force's job description, job assignments, and job duties given to them by the State of California Department of Justice does not and did not at all authorize them under California state law to analyze, copy, review, extract, and manipulate video recordings from a GoPro video camera that was confiscated during a bogus criminal threats investigation. They illegally, unlawfully, and unconstitutionally did so on behalf of corrupt and rogue peace officers Billy Khounthavong, Richard Lewis, and the longstanding tainted and corrupt LASD Temple City police station. See below:

<https://oag.ca.gov/ecrime/httap>

- [Home](#)
- [About](#)
- [Media](#)
- [Careers](#)
- [Regulations](#)
- [Resources](#)
- [Programs](#)
- [Appointments](#)
- [Contact](#)

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

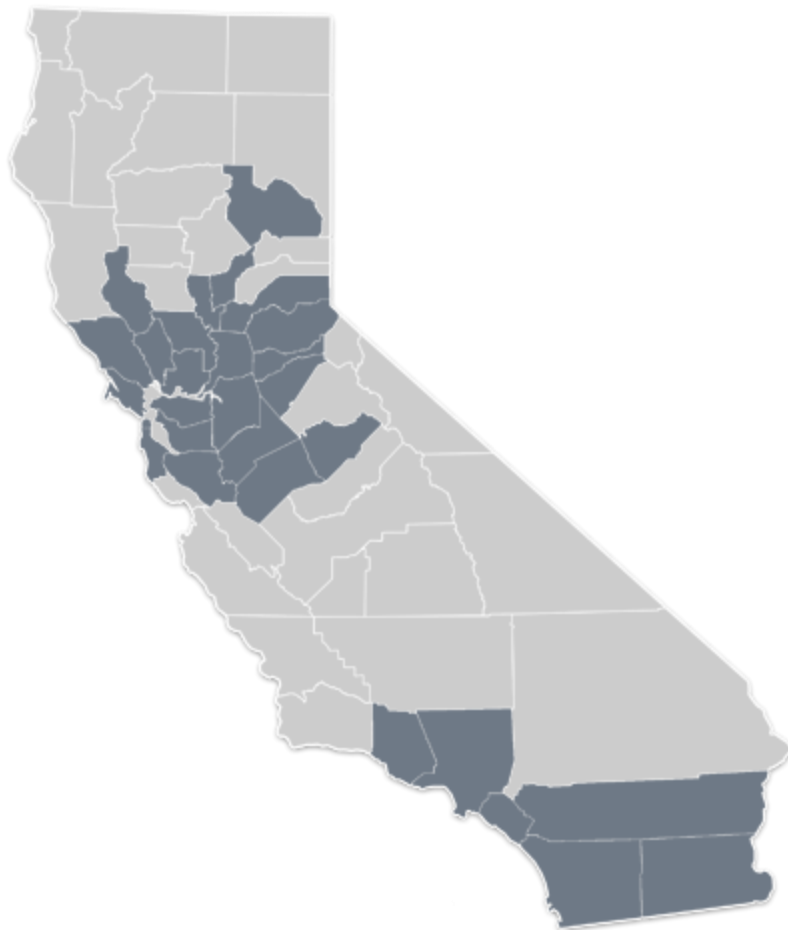
High Technology Theft Apprehension and Prosecution (HTTAP) Program

1. [Home](#)
2. [eCrime](#)
3. High Technology Theft Apprehension and Prosecution (HTTAP) P...

The California High Technology Crimes Task Force strategy was created in 1998 through Senate Bill 1734, to help combat computer-related crimes such as network intrusions, computer hacking, counterfeiting and piracy, theft of trade secrets, theft of high-tech related equipment, and telecommunications fraud.

This legislation established the High Technology Theft Apprehension and Prosecution (HTTAP) Program which is now managed through the California Emergency Management Agency (Cal EMA). The HTTAP Program includes five regional Task Forces covering 29 counties and encompassing a population of over 31 million. The program was expanded in 2001 to include an identity theft component.

The five regional Task Forces



1. [Northern California Computer Crimes Task Force \(NC3TF\)](#)
2. [Sacramento Valley Hi-Tech Crimes Task Force \(SVHTCTF\)](#)
3. [Rapid Enforcement Allied Computer Team \(REACT\)](#)
4. Southern California High Tech Task Force (SCHTTF)
5. [Computer and Technology Crime High-Tech Response Team \(CATCH\)](#)

Other Regional Task Forces

1. [Los Angeles Electronic Crimes Task Force \(LAECTF\)](#)

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

2. [San Francisco Electronic Crimes Task Force](#)

HTTAP Program Mission

The mission of the HTTAP Program is the investigation, apprehension, and prosecution of high technology crimes and to combat identity theft. High technology crimes (or cybercrimes) are generally defined as any type of illegal activity that makes use of the internet, a private or public network, or an in-house computer system.

The directed groups of attack are the following three categories: personal, property, or government. Following are the components of cybercrime:

- Malware and malicious code
- Extortion
- Denial-of-service attacks
- Counterfeiting and piracy
- Computer viruses
- Email extortion
- Cyber stalking
- Auction fraud
- Theft of intellectual property
- Reshipping
- Identity theft
- Phishing, pharming, spearing, and whaling
- Network intrusions (hacking)
- Cyber terrorism

The HTTAP Task Forces partner with the private industry to help companies prevent, detect, and respond to computer-related crimes. The Task Force's personnel are highly trained professionals who also draw upon the expertise of private industry, acad

INNOCENT DEFENDANT AROGANT HOLLYWOOD WILL REPEAT THAT AGAIN!

The mission of the HTTAP Program is the investigation, apprehension, and prosecution of high technology crimes and to combat identity theft. High technology crimes (or cybercrimes) are generally defined as any type of illegal activity that makes use of the internet, a private or public network, or an in-house computer system.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 The mission of the High Technology Theft Apprehension and Prosecution
2 (HTTAP) Program is not to copy, search, manipulate, and copy GOPRO video recordings
3 related to a criminal threats investigation. Further, the evidence shown on AROGANT'S
4 Instagram profile and YouTube account proves that Billy Khounthavong and Richard
5 Lewis' only purpose in sending AROGANT'S GOPRO camera to the Southern California
6 High Tech Task Force Response Team [SCHTTF] was so that they and LASD could
7 manipulate AROGANT'S GOPRO video recordings to frame AROGANT by making him
8 appear guilty. Just as Billy Khounthavong, Richard Lewis, County of Los Angeles
9 Sheriff's Department Temple City police station, and Brian Mark Rosenberg did at the
10 preliminary hearing by misleading the court by showing it an altered and edited GOPRO
11 video recording frame sequence of AROGANT shutting off his GoPro camera as he
12 reentered Jennifer Hutton-Heger's home. Lying Billy testified that he saw AROGANT
13 shutting off his GoPro camera, which resulted in a miscarriage of justice as AROGANT
14 was held to answer for a violent and serious felony offense that he never committed. Billy
15 Khounthavong and Richard Lewis did not have the video expertise and knowledge to
16 manipulate, separate, and edit AROGANT'S GoPro video recordings. Still, the Southern
17 California High Tech Task Force [SCHTTF] did. Peace officers working for SCHTTF
18 also willfully, recklessly, and wantonly violated California Government Code §
19 **6200**. And AROGANT will pursue efforts to decertify and criminally charge them all.

20 The California Commission on Peace Officer Standards and Training's Basic Course
21 Workbook Series provides:

22 **Probable Cause to Search, Continued**
23 **2-10 LD 16: Chapter 2 – Warrant Searches and Seizures**

24 **VERIFIED LEGAL BRIEF**

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 Related terms

2
3
4 To better understand probable cause as it relates to searches and seizures,
5 peace officers need to understand the following terms.
6

7 Reasonable inference is the act of drawing a conclusion from a fact; it is similar to
8 making a presumption (e.g., seeing smoke and inferring there is a fire).
9

10
11 Direct evidence is evidence that proves a fact directly, without an inference or
12 presumption (e.g., the sale of a controlled substance to an undercover officer).

13 Circumstantial evidence is evidence that proves a fact indirectly, that is, personal
14 knowledge or observations from which deductions must be drawn by the jury or court
15 (e.g., partial six-pack of beer found on the car seat supports inference that someone in the
16 car has been drinking).
17

18
19 NOTE: Whether evidence is direct or circumstantial depends on the fact
20 to be proven.
21

22 **Id. at LD 16: Chapter 2-Warrant Searches and Seizures, found on page 41 of 176**

23
24
25 Billy Khounthavong and Richard Lewis knew they had zero reasonable inferences for
26 which they could have drawn conclusions from facts that AROGANT'S GoPro camera
27 would show him committing a felony. Thus, their actions were unlawful and willfully,
28 recklessly, and wantonly infringed upon AROGANT'S Fourth Amendment Search and
Seizure Clause constitutional rights and infringed upon AROGANT'S Fourteenth

Amendment Due Process Clause constitutional rights. *Supra, Henry v. United States* at 101

Billy Khounthavong and Richard Lewis' fabricated search affidavit not only recklessly, wantonly, and willfully violated AROGANT'S civil rights, but their actions also recklessly and wantonly violated LASD search warrant policies and procedures and based on their training in California Commission on Peace Officer Standards and Training, Basic Course Workbook Series Chapters 1 and 2, they knew that what they were doing in Hollywood's criminal threats investigation was wrong and illegal.

The California Commission on Peace Officer Standards and Training's Basic Course Workbook Series provides:

Execution of a Search Warrant

Introduction Even if sufficient probable cause has been established and a search warrant has been issued, evidence can still be excluded if the warrant itself is not executed within the law.

Securing an area pending issuance of a search warrant

Under very limited circumstances peace officers may secure a residence while in the process of obtaining a search warrant. In addition to probable cause to search, they also need exigencies, that is, a belief, based on the surrounding circumstances or information at hand, that the evidence will likely be destroyed or removed before a search warrant can be obtained. An area may be secured pending issuance of a search warrant if the

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 suspect has been arrested inside the location. An area may be secured pending issuance of
2 a search warrant if companions of the suspect may destroy items sought upon learning of
3 the arrest.
4

5
6 NOTE: Refusal of consent to enter, by itself, does not provide
7 justification to secure the premises pending issuance of a
8 search warrant.
9

10
11 **Id. at LD 16: Chapter 2-Warrant Searches and Seizures 2-12, found on page 43 of**
12 **176**
13

14 Billy Khounthavong and Richard Lewis' bogus search warrant was not executed
15 according to California penal code law because they both knew there was zero evidence
16 to support any probable cause that AROGANT'S GoPro camera would show him
17 committing a felony. Further, based upon their training in the POST manual and the real
18 GOPRO video recording witnessed by over one hundred or more County of Los Angeles
19 peace officers and attorneys receiving the video download on November 28, 2023, the
20 bogus search warrant was not supported by any probable cause whatsoever.
21
22

23
24 The California Commission on Peace Officer Standards and Training's Basic Course
25 Workbook Series provides:
26

27 **Execution of a Search Warrant, Continued**
28

LD 16: Chapter 2 – Warrant Searches and Seizures 2-13

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 Examples Undercover officers arranged to purchase a kilo of cocaine. The seller, after
2 showing a sample and seeing the money, drove to his supplier's residence a few miles
3 away, obtained the cocaine, returned to the officers, made the sale, and was arrested.
4 Other officers, who followed the seller and kept the supplier's residence under
5 surveillance, entered and secured the residence pending procurement of a search warrant.
6 A male suspect was working with a female suspect selling drugs from the woman's
7 residence. A few blocks from the woman's house, in public and in front of onlookers,
8 police stopped the male suspect and arrested him with drugs he had admittedly obtained
9 from his female partner. The officers had reason to believe that the female partner might
10 learn of the arrest or become suspicious when the male suspect did not return as
11 scheduled. The circumstances were sufficient to justify entering and securing the
12 residence while waiting for a search warrant.
13
14
15

16
17 ***Id.* at LD 16: Chapter 2-Warrant Searches and Seizures 2-13, found on page 44 of**
18 **176**
19

20 Based on the above POST manual examples, it should be clear that Billy
21 Khounthavong and Richard Lewis' false statements that AROGANT's GoPro camera
22 would show him committing a felony did not constitute grounds for the execution of a
23 search on AROGANT'S GoPro camera because based on the original GoPro video
24 recording uploaded to AROGANT'S Instagram channel they both had already reviewed
25 the GoPro without a search warrant prior to even saying in their fabricated police report
26 that they had obtained a search warrant. Based on this illegal search, before requesting a
27 search warrant, they both determined that AROGANT'S original GoPro video recording
28 would exonerate him, and this is when they decided to send AROGANT'S exculpatory

original video recording to County of Los Angeles Sheriff's Department Fraud and Cyber Crimes Bureau's Southern California High Tech Task Force [Which is jointly operated with Ventura County Sheriff's Office] to manipulate the videos and frame AROGANT by recklessly creating a video of AROGANT shutting off his GoPro camera by finding a previously recorded video frame sequence of AROGANT shutting off his GoPro camera before February 21, 2023, and then pasting this same previously recorded video frame sequence at the end of separated and altered GoPro video GL010586, which before LASD Southern California High Tech Task Force's reckless alteration, was one continuous GOPRO video recording. This evidence of reckless, willful, malicious, wanton, and callous fabrication and tampering of evidence is proven by clear and convincing evidence easily by two facts:

- (1) The People, Janis Eve Johnson, Brian MARK Rosenberg, Victor Manuel Rodriguez, and numerous other County of Los Angeles criminal prosecutors have recklessly violated AROGANT'S *Brady rights*, U.S.C.A. Const. Amend XIV Due Process constitutional rights, California constitutional rights County of Los Angeles District Attorney's Office Discovery Compliance System Manual, County of Los Angeles District Attorney's Office Legal Policies Manual: Chapter 14: Disclosure of Exculpatory and Impeachment Information, California Constitution, Article I, § 7, and California Penal Code § 1054 by intentionally and recklessly failing to turn over impeaching phony GoPro video recordings GL010586 and GL010587 between February 2023 and June 2024 (sixteen consecutive months), outright refusing to turn it over despite numerous requests in writing, in court motions, during telephone conversations, during facsimile transmissions, through electronic mailing, and recklessly showing and admitting phony impeaching LASD-created GOPRO video

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

recordings GL010586 and GL010587 into a State of California Criminal Superior Court on April 4, 2023, April 5, 2023, and February 2, 2023 without first providing AROGANT or his investigators with a copy before presenting phony impeaching video recordings to the State of California Alhambra Superior Court, while the original GoPro video recordings were in their possession and presented to a State of California Superior Court without any evidence that these phony GoPro video recordings GL010586 and GL010587 were ever copied from AROGANT's original GoPro video recordings kept in the possession of both Billy S. Kohunthavong and Los Angeles County Sheriff's Department Southern California High Tech Task Force, a direct violation of California Evidence Code § 1521, THE PEOPLE NEVER TURNED OVER PLAYABLE COPIES OF ORIGINAL GOPRO VIDEO RECORDINGS NOT EVEN TO LYING AND RACIST EXPERT WITNESS THOMAS LEO GUZMAN-SANCHEZ, who was hired to compare real GoPro video recordings to phony impeaching GOPRO video recordings played and presented to the Superior Court on April 4, 2023, April 5, 2023, and February 2, 2023.

- (2) The still images taken from AROGANT'S real GOPRO video recordings depicting him wearing a long sleeve coat and his GoPro camera and chest harness prove by clear and convincing evidence that the County of Los Angeles District Attorney's Office and Los Angeles County District Attorney's Office recklessly, willfully, maliciously, wantonly, and callously violated California Government Code § 6200 by tampering with evidence and presenting false evidence into a State of California Superior Court by showing it phony LASD-created GOPRO video recordings that depicted AROGANT shutting on his GOPRO camera while wearing dark-colored shorts and a tank top, and depicted AROGANT walking to Jennifer Hutton Heger's front door yet never been seen standing in her mirror.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

See here again:

https://www.instagram.com/reel/Cz0sb6auaos/?utm_source=ig_web_copy_link&igshid=MzRIODBiNWFIZA=
[≡](#)

The California Commission on Peace Officer Standards and Training's Basic Course Workbook Series provides:

Execution of a Search Warrant, Continued

LD 16: Chapter 2 – Warrant Searches and Seizures 2-15

Time limit for service Penal Code Section 1534 states that the search warrant shall be executed and returned within 10 days from issuance. The 10-day time limit means that peace officers have 10 days within which to execute the warrant, beginning with the day after the warrant is issued and running until midnight of the 10th day, with no exceptions for weekends or holidays.

NOTE: It is a felony for a peace officer to willfully disclose the existence of a search warrant, prior to its execution, for the purpose of preventing the search or seizure. (Penal Code Section 168) Failure to make a timely execution.

If the 10-day period has expired, peace officers must either:
obtain a new warrant resubmit the expired warrant so it may be reissued and revalidated

Failure to make a timely return

The return of the warrant means returning the warrant and a written inventory

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 of the property taken to the magistrate (PC 1537). The rule for return of the warrant is
2 slightly different than for execution. If the 10th day falls on a weekend or holiday, then
3 peace officers are entitled to postpone returning the warrant until the next business day.
4 A late return will not normally invalidate the warrant or result in suppression, particularly
5 if it happens unintentionally, unless the defendant can show prejudice.
6

7 8 Time of service

9 Normally, a search warrant may be served only between the hours of 7:00 a.m.
10 and 10:00 p.m.
11

12 ***Id.* at LD 16: Chapter 2-Warrant Searches and Seizures 2-15, found on page 46 of**
13 **176**
14

15
16 Billy Khounthavong never documented in his original fabricated supplemental
17 police report that he served a copy of his bogus search warrant upon AROGANT. Nor in
18 his numerous supplemental and follow-up police reports does he mention that he served a
19 copy of his bogus police report upon AROGANT. Yet on or about September 9, 2023, he
20 alleged on a forged search warrant return that he served a copy of his bogus search
21 warrant upon AROGANT on February 23, 2023. LIAR. AROGANT was being
22 transported from LASD Temple City to Alhambra Superior Court at 7:30 a.m. Pacific
23 Standard Time. AROGANT was not even in the building to be served, as Billy
24 Khounthavong falsely alleged. AROGANT was never served a copy of his bogus search
25 warrant. The fact that Billy S. Khounthavong attempted to file a search warrant return
26 seven months after the fact proves that it was never issued. More in-depth information
27 will be provided in a complaint about Billy Khounthavong regarding the search warrant
28 return in a separate email.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 AROGANT was prejudiced because he was never served a copy of the search
2 warrant, and this made it much harder for him to defend against the search warrant. Also,
3 since the search warrant was never served upon AROGANT when it could have been.
4 The execution of the alleged mysterious search warrant was void and invalidated. Once
5 again, Billy Khounthavong and Richard Lewis willfully, recklessly, and wantonly
6 violated their California Commission on Peace Officer Standards and Training search
7 warrant policies and procedures they learned while in training with POST. AROGANT
8 suffered prejudice because Billy Khounthavong and Richard Lewis forged a search
9 warrant return seven months later and intentional non-service of their bogus search
10 warrant recklessly and wantonly violated AROGANT'S Fourth Amendment Search and
11 Seizure Clause and Fourteenth Amendment Due Process Clause constitutional rights.
12
13
14

15 The California Commission on Peace Officer Standards and Training's Basic Course
16 Workbook Series provides:
17
18

19 **Execution of a Search Warrant, Continued**
20 **2-20 LD 16: Chapter 2 – Warrant Searches and Seizures**
21

22 Scope and specificity of a search warrant
23

24 During a search authorized by a search warrant, officers are limited by the
25 information specified in the search warrant. (This is known as the scope of the
26 search.)
27

28 Search warrants must include specific:

- statutory grounds for issuance
- identification of the area(s) or person(s) that may be searched
- identification of the item(s) to be seized

If an area is searched or an item is seized that is beyond the scope of the
warrant, the evidence may be excluded later at trial.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

Id. at LD 16: Chapter 2-Warrant Searches and Seizures 2-20, found on page 51 of 176

On page 1 of 6 of Billy Khounthavong and Richard Lewis' bogus search warrant the following is stated:

SEALING ORDER REQUESTED: _____YES X ____NO

THUS, IT IS EXTREMELY ODD THAT WHILE BILLY KHOUNTHAVONG AND RICHARD LEWIS'S BOGUS SEARCH WARRANT WAS NEVER SEALED BY THE PASADENA SUPERIOR COURT. THE PASADENA SUPERIOR COURT CAN NOT FIND AND HAS NO PHYSICAL AND/OR ELECTRONIC COURT RECORDS OF IT EVER BEING ISSUED AND APPROVED BY ANY PASADENA SUPERIOR COURT JUDICIAL OFFICER.

Near the end of page 1 of 6 of Billy Khounthavong and Richard Lewis' bogus search warrant the following is stated to be ordered by the Court:

FOR THE FOLLOWING PROPERTY:

All data and/or content that constitutes evidence and instrumentalities of criminal threats, February 21, 2023. ***Id.*** at page 1 of 6

At the rigged and unconstitutional preliminary hearing that commenced on April 4, 2023, and concluded on April 5, 2023, Billy Khounthavong violated POST training and policies, LASD policies and procedures, and of course California Government Code § **6200** by testifying falsely that AROGANT shut off his GoPro camera for seven minutes on February 21, 2023, after he had presented to the court tainted and manipulated GoPro video recordings based upon a bogus never issued search warrant.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 On April 5, 2023, Billy Khounthavong testified that he instructed the Los Angeles
2 County Sheriff's Department Southern California High Tech Task Force to download
3 GoPro video recordings for the past two days. Further, disgraced and dishonest Brian
4 Mark Rosenberg willfully, recklessly, maliciously, and wantonly violated California
5 Business and Professions Code § 6068, California Government Code § 6200, California
6 State Bar Rule 3.3, and California State Bar Rule 4.1 by allowing Billy Khounthavong to
7 testify falsely that AROGANT shut his GoPro camera off for seven minutes on February
8 21, 2023, while the original GoPro video recording of AROGANT doing nothing wrong
9 was in the physical possession of Brian Mark Rosenberg, Victor Manuel Rodriguez,
10 James Garrison, Ronald Geltz, Stephanie Pearl Mire and other emailed County of Los
11 Angeles criminal prosecutors the entire time!

12
13
14
15 At the preliminary hearing on April 5, 2023, Billy Khounthavong testified almost
16 verbatim to the following:

17 *"I sent the GOPRO to our High Tech bureau. Detectives there downloaded the data from the*
18 *GOPRO itself, and I received the data from them."*

19
20 At the preliminary hearing County of Los Angeles Sheriff's Department. Richard
21 Lewis and Billy Khounthavong admitted that they framed AROGANT by sending his
22 GoPro camera to a law enforcement bureau whose job duties did not include reviewing
23 video footage obtained in a criminal threats investigation.

24
25 At the preliminary hearing, LASD. Richard Lewis and Billy Khounthavong admitted
26 that they framed AROGANT by instructing LASD Fraud and Cyber Crimes' Southern
27 California High Tech Task Force rogue detectives to illegally search, access, and copy
28 AROGANT's GoPro camera video recordings recorded before February 21, 2023, while
SCHTT was a law enforcement bureau whose job duties did not include reviewing video

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 footage obtained in a criminal threats investigation. Billy Khounthavong and Richard
2 Lewis knew that their bogus search warrant did not authorize them to obtain access to
3 AROGANT'S GoPro video recordings recorded on February 20, 2023. Thus, Billy
4 Khounthavong, Richard Lewis, and LASD Fraud and Cyber Crimes Bureau's actions and
5 conduct of accessing, searching, copying, editing, and altering AROGANT'S GOPRO
6 video recordings recorded prior to February 21, 2023 willfully, recklessly, and wantonly
7 violated California Commission on Peace Officer Standards and Training procedures and
8 policies, AROGANT'S Fourth Amendment Search and Seizure constitutional rights, and
9 his Fourteenth Amendment Due Process Clause constitutional rights. Since Billy
10 Khounthavong, Richard Lewis, and LASD Fraud and Cyber Crimes Bureaus created a
11 GoPro video recording showing AROGANT shutting off his GoPro camera just before he
12 reentered Jennifer Hutton-Heger's home on the fateful and unfortunate morning of
13 February 21, 2023, and because their bogus video recording was knowingly false and
14 presented to a Superior Court, they all recklessly, maliciously, and wantonly violated
15 California Government Code § 6200 because their actions were knowingly false and
16 intentional, and the access of AROGANT'S GOPRO video recordings recorded prior to
17 February 21, 2023 was outside of the scope of Billy Khounthavong's bogus search
18 warrant. Id. at page 1
19
20
21
22

23
24 The California Commission on Peace Officer Standards and Training's Basic Course
25 Workbook Series provides:
26
27
28

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 **Execution of a Search Warrant, Continued**

2
3 **2-22 LD 16: Chapter 2 – Warrant Searches and Seizures**

4 Nexus rule

5
6 Under the nexus rule, officers may seize items not listed in the warrant when:

- 7
8 · the items are discovered while the officers are conducting a lawful search
9 for the listed evidence, and
10 · they have probable cause to believe the item is contraband, evidence of
11 criminal behavior, or would otherwise aid in the apprehension or
12 conviction of the criminal

13 Nexus means a reasonable connection or link between two or more items.

14 ***Id.* at LD 16: Chapter 2-Warrant Searches and Seizures 2-22, found on page 53 of**
15 **176**

16
17
18 **Execution of a Search Warrant, Continued**

19
20 LD 16: Chapter 2 – Warrant Searches and Seizures 2-23

21
22
23 Examples During a warrant search for narcotics, officers found a sawed-off shotgun in
24 the trunk of the suspect’s car. Although the weapon was not named in the
25 search warrant, it was seized by the officers as an illegal weapon.

26 While searching a suspect’s residence on a murder case, officers seized a pair
27 of shoes with a “waffle-like” pattern on the soles even though the shoes were
28 not described in the search warrant. The seizure of the shoes was legal
because one of the officers had personal knowledge that waffle-like shoeprints
were left at the scene of the crime by the suspect.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

***Id.* at LD 16: Chapter 2-Warrant Searches and Seizures 2-23, found on page 54 of 176**

Billy Khounthavong, Richard Lewis, and the County of Los Angeles Sheriff's Department Fraud and Cyber Crimes Bureau willfully, recklessly, maliciously, wantonly, and callously violated California Commission on Peace Officer Standards and Training policies and procedures and County of Angeles Sheriff's Department Policy Archival and Retrieval System, Manual of Policy and Procedures, Volume 2—Organization and Functions, Chapter 5 because they all had no probable cause to believe that AROGANT'S GOPRO video recordings recorded prior to February 21, 2023, contained on them evidence of criminal behavior.

Billy Khounthavong, Richard Lewis, and LASD Fraud and Cyber Crimes Bureau willfully violated California Commission on Peace Officer Standards and Training policies and procedures because they all had no probable cause to believe that AROGANT's GoPro video recordings recorded prior to February 21, 2023, contained on it evidence of criminal conduct that would have aided them with convicting AROGANT.

Chapter Synopsis

Learning need To search for and seize evidence legally, peace officers must know the rules and requirements for obtaining and executing a search warrant.

Probable cause and search warrants

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 [16.02.2]
2
3
4

5 Peace officers must establish probable cause that:

- 6 · a crime has been committed
7 · evidence of the crime exists
8 · the evidence sought is located at the place to be searched
9

10
11 Securing an area
12

13 [16.02.7]
14

15 Under very limited circumstances peace officers may secure a residence while
16 in the process of obtaining a search warrant. In addition to probable cause to
17 search, they also need exigencies, that is, a belief, based on the surrounding
18 circumstances or information at hand, that the evidence will likely be
19 destroyed or removed before a search warrant can be obtained.
20

21 Time
22 limitations
23

24 [16.02.8]
25

26 Penal Code Section 1534 states that the search warrant shall be executed and
27 returned within 10 days from issuance, beginning with the day after the
28 warrant is issued and running until midnight of the 10th day, with no
exceptions for weekends or holidays. A search warrant may be served only between the
hours of 7:00 a.m. and 10:00 p.m., unless designated for nighttime service by the
magistrate issuing the warrant.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 Billy Khounthavong and Richard Lewis knew that they had no probable cause to
2 continue to imprison AROGANT. After watching the original GoPro video recording,
3 they should have done the right thing and released AROGANT immediately. Instead, the
4 evil-minded and corrupt white and brown devils framed AROGANT by sending his
5 exculpatory GoPro videos to LASD Fraud and Cyber Crimes Bureau to be manipulated
6 and altered so they could convince the Alhambra Superior Court that AROGANT made a
7 criminal threat on February 21, 2023.
8
9

10
11 LASD Fraud and Cyber Crimes Bureau detectives had a duty to report to the Los
12 Angeles County District Attorney's office that AROGANT's original GoPro video
13 recordings did not show him committing a felony after they had of course, reviewed
14 AROGANT's original GL010586 GOPRO video recorded on February 21, 2023,
15 beginning at the exact approximately 9:59 a.m. and ending at approximately 10:14 a.m.
16 Instead LASD Fraud and Cyber Crimes Bureau detective peace officers intentionally
17 framed AROGANT by splitting up one original GoPro video recording into three other
18 video recordings, and then creating a GoPro video recording that depicted a false video
19 frame sequence of AROGANT shutting of his GoPro camera as he stood inside the house
20 of the now deceased Jeniifer Hutton-Heger. All LASD Fraud and Cyber Crimes Bureau
21 detectives that were associated with this shady and corrupt criminal threats investigation
22 were guilty of willfully, maliciously, recklessly, and wantonly violating California
23 Commission on Peace Officer Standards and Training policies and procedures and
24 California Government Code § 6200.
25
26
27
28

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

Warrantless Searches in General, Continued

LD 16: Chapter 3 – Warrantless Searches and Seizures 3-10

Establishing the basis for a warrantless search or seizure

In deciding whether a warrantless search or seizure was legal, courts will always consider the totality of the circumstances. However, peace officers must always have specific facts to demonstrate the search or seizure fell within one of the exceptions to the warrant requirement.

***Id.* at LD 16: Chapter 3-Warrantless Searches and Seizures 3-10, found on page 70 of 176**

BILLY KHOUNTHAVONG TESTIFIED AFTER THE PRELIMINARY HEARING THAT HE INSTRUCTED PEACE OFFICERS FROM LASD'S FRAUD AND CYBER CRIME BUREAU'S SOUTHERN CALIFORNIA HIGH TASK FORCE [A PARTNERSHIP TASK FORCE OPERATED WITH VENTURA SHERIFF'S OFFICE] TO DOWNLOAD GOPRO VIDEOS FOR FEBRUARY 20, 2023 TO FEBRUARY 21, 2023.

THREE THINGS STAND OUT HERE:

1. HOW DID BILLY KHOUNTHAVONG KNOW THAT GOPRO CAMERA CONTAINED VIDEOS PRIOR TO FEBRUARY 21, 2023? THE ONLY WAY THE CROOKED AND DISGRACED PEACE OFFICER BILLY KHOUNTHAVONG COULD HAVE KNOWN THOSE DETAILS IS IF HE

1 SEARCHED THE GOPRO CAMERA'S VIDEO RECORDINGS PRIOR TO
2 SENDING AROGANT'S GOPRO CAMERA TO LASD'S SOTHERN
3 CALIFORNIA HIGH TECH TASK FORCE.
4

- 5
- 6 2. THE WARRANTLESS SEARCH OF AROGANT'S GOPRO VIDEO
7 RECORDINGS PREVIOUSLY RECORDED ON FEBRUARY 20, 2023 WAS
8 ILLEGAL AND WAS NOT AUTHORIZED IN THE LOS ANGELES COUNTY
9 SHERIFF'S DEPARTMENT MAKE-BELIEVE NO ELECTRONIC COURT
10 RECORDS EXISTING BOGUS AND COUNTERFEIT SEARCH WARRANT.
11
- 12
- 13 3. THE ORIGINAL GOPRO VIDEO SENT TO ALL WHO ARE ON AROGANT'S
14 EMAIL LIST PROVES THAT THE ONLY REASON WHY BILLY
15 KHOUNTHAVONG AND LOS ANGELES COUNTY SHERIFF'S
16 DEPARTMENT ILLEGALLY SEARCHED, ACCESSED, AND
17 COPIED AROGANT'S GOPRO VIDEO RECORDINGS THAT WERE
18 RECORDED PRIOR TO FEBRUARY 21, 2023 WAS SO THAT THEY COULD
19 FIND A GOPRO VIDEO OF AROGANT SHUTTING OFF HIS GOPRO
20 CAMERA SO AND THEN USE THOSE SAME VIDEO RECORDINGS'
21 VIDEO FRAME IMAGE SEQUENCES TO COPY AND PASTE INTO A
22 VIDEO FRAME SEQUENCE OF AROGANT REENTERING THE HOME OF
23 LYING DECEASED CUNT JENNIFER HUTTON-HEGER, FOR THE SOLE
24 PURPOSE OF BRIAN MARK ROSENBERG AND BILLY KHOUNTHAVONG
25 FRAMING AROGANT AT THE PRELIMINARY HEARING BY
26 MISLEADING THE SUPERIOR COURT BY SHOWING IT A GOPRO VIDEO
27 RECORDING OF AROGANT SHUTTING OFF HIS GOPRO CAMERA. IN
28 THE FURTHERANCE OF LOS ANGELES COUNTY'S CONSPIRACY TO

1 FRAME HOLLYWOOD FOR A SERIOUS AND VIOLENT CRIME IT KNEW
2 THAT HOLLYWOOD DID NOT COMMIT.
3

4
5
6 **BRIAN MARK ROSENBERG RECKLESSLY AND WANTONLY VIOLATED**
7 **AROGANT HOLLYWOOD'S FOURTH AMENDMENT SEARCH AND**
8 **SEIZURE CLAUSE CONSTITUTIONAL RIGHTS.**

9 **BRIAN MARK ROSENBERG RECKLESSLY AND WANTONLY VIOLATED**
10 **AROGANT HOLLYWOOD'S FOURTEENTH AMENDMENT DUE PROCESS**
11 **CLAUSE CONSTITUTIONAL RIGHTS.**

12 **BRIAN MARK ROSENBERG RECKLESSLY AND WANTONLY**
13 **VIOLATED CALIFORNIA GOVERNMENT CODE SECTION 6200 AND HE**
14 **MUST BE CRIMINALLY CHARGED!**

15
16 **BRIAN MARK ROSENBERG WILLFULLY, MALICIOUSLY, RECKLESSLY,**
17 **AND WANTONLY VIOLATED CALIFORNIA BUSINESS & PROFESSIONS**
18 **CODE § 6068 by knowingly and intentionally presenting to the Court false evidence**
19 **in the form of a manipulated and altered GOPRO video recordings GL010586 and**
20 **GL010587.**

21 **BRIAN MARK ROSENBERG WILLFULLY, MALICIOUSLY, RECKLESSLY,**
22 **AND WANTONLY VIOLATED STATE BAR OF CALIFORNIA RULE 3.3,**
23 **CANDOR TOWARD TRIBUNAL BY DOING MANY THINGS IN THIS**
24 **FRIVOLOUS CASE, INCLUDING BUT NOT LIMITED TO knowingly and**
25 **intentionally presenting to the Alhambra Superior Court false evidence in the form**
26 **of a manipulated and altered GOPRO video recording.**

27 **BRIAN MARK ROSENBERG WILLFULLY, MALICIOUSLY, RECKLESSLY, AND**
28 **WANTONLY VIOLATED STATE BAR OF CALIFORNIA RULE 4.1, TRUTHFULNESS IN**
STATEMENTS TO OTHERS BY DOING MANY THINGS IN THIS FRIVOLOUS CASE,
INCLUDING BUT NOT LIMITED TO knowingly and intentionally turning over false
electronic, physical, and audio criminal discovery to case GA114055 court-
appointed co-counsel NEIL E. OPDAHL LOPEZ [STATE BAR # 277596].

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

BILLY KHOUNTHAVONG RECKLESSLY AND WANTONLY VIOLATED AROGANT HOLLYWOOD'S FOURTH AMENDMENT SEARCH AND SEIZURE CLAUSE CONSTITUTIONAL RIGHTS.

BILLY KHOUNTHAVONG RECKLESSLY AND WANTONLY VIOLATED AROGANT HOLLYWOOD'S FOURTEENTH AMENDMENT DUE PROCESS CLAUSE CONSTITUTIONAL RIGHTS.

BILLY KHOUNTHAVONG RECKLESSLY AND WANTONLY VIOLATED CALIFORNIA GOVERNMENT CODE SECTION 6200 AND HE MUST BE CRIMINALLY CHARGED!

RICHARD LEWIS RECKLESSLY AND WANTONLY VIOLATED AROGANT HOLLYWOOD'S FOURTH AMENDMENT SEARCH AND SEIZURE CLAUSE CONSTITUTIONAL RIGHTS.

RICHARD LEWIS RECKLESSLY AND WANTONLY VIOLATED AROGANT HOLLYWOOD'S FOURTEENTH AMENDMENT DUE PROCESS CLAUSE CONSTITUTIONAL RIGHTS.

RICHARD LEWIS RECKLESSLY AND WANTONLY VIOLATED CALIFORNIA GOVERNMENT CODE SECTION 6200 AND HE MUST BE CRIMINALLY CHARGED!

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT FRAUD AND CYBER CRIMES BUREAU'S SOUTHERN CALIFORNIA HIGH TECH TASK FORCE PEACE OFFICERS RECKLESSLY AND WANTONLY VIOLATED AROGANT HOLLYWOOD'S FOURTH AMENDMENT SEARCH AND SEIZURE CLAUSE CONSTITUTIONAL RIGHTS.

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT FRAUD AND CYBER CRIMES BUREAU'S SOUTHERN CALIFORNIA HIGH TECH TASK FORCE PEACE OFFICERS RECKLESSLY AND WANTONLY VIOLATED AROGANT HOLLYWOOD'S FOURTEENTH AMENDMENT DUE PROCESS CLAUSE CONSTITUTIONAL RIGHTS.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1
2 **LASD FRAUD AND CYBER CRIMES BUREAU'S SOUTHERN CALIFORNIA**
3 **HIGH TECH TASK FORCE PEACE OFFICERS RECKLESSLY AND**
4 **WANTONLY VIOLATED CALIFORNIA GOVERNMENT CODE SECTION**
5 **6200, AND THEY MUST BE CRIMINALLY CHARGED!**
6

7 On or about March 28, 2023, rogue and dishonest County of Los Angeles District
8 Attorney's Office criminal prosecutor Brian Mark Rosenberg willfully, recklessly,
9 wantonly, maliciously, and callously violated California Business and Professions Code
10 § 6068, State Bar of California, California Rules of Professional Conduct Rules (Revised
11 2023), Rules 1.2.1 Advising or Assisting the Violation of Law, Rule 3.1 Meritorious
12 Claims and Contentions, Rule 3.3 Candor Toward the Tribunal, Rule 3.4 Fairness to
13 Opposing Party and Counsel, and Rule 3.8 Special Responsibilities of a Prosecutor by
14 recklessly failing to turn over impeaching phony GoPro video recordings GL010586 and
15 GL010587
16

17 At the preliminary hearing on April 4, 2023, and April 5, 2023, dishonest deputy
18 district attorney Brian Mark Rosenberg willfully, wantonly, and recklessly violated
19 California Evidence Code Section 1522, subdivision (b) by presenting to the court as
20 evidence unoriginal, tainted, tampered with, edited, modified, and altered GOPRO video
21 recordings.
22

23
24 At the preliminary hearing on April 5, 2023, Brian Mark Rosenberg assisted Billy
25 Khounthavong in testifying falsely that AROGANT shut off his GOPRO for seven
26 minutes during the make-believe knife and criminal threats separate incidents. While
27 Billy Khounthavong was on the stand, racist, biased, and dishonest criminal prosecutor
28 Brian Mark Rosenberg played an edited and altered GOPRO video recording that
depicted and showed AROGANT shutting off his GoPro camera while he was inside the
home of now-deceased fake victim Jennifer Hutton-Heger. This particular altered video

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 recording (GL010586) was never turned over to AROGANT. This particular altered
2 video recording (GL010586) was never turned over to AROGANT'S co-counsel Neil
3 Opdahl-Lopez. This particular altered video recording (GL010586) was never turned
4 over to AROGANT'S private investigators, Carlos Jackson and then Joel Wynn, at any
5 time. In general, Brian Mark Rosenberg, James Garrison, Sharon Lee Woo, George
6 Gascon, Victor Manuel Rodriguez, and Ronald Geltz all recklessly violated
7 AROGANT'S United States Due Process Clause Fourteenth Amendment constitutional
8 rights by recklessly failing to turn over a copy of the original
9 GoPro video recordings to AROGANT and also turn over a copy of altered GOPRO
10 video recordings that falsely showed and displayed AROGANT shutting off his GOPRO
11 camera (GL010586), and a separate GOPRO video recording (GL010587) that falsely
12 showed AROGANT walking to Hutton's front door while never being shown standing in
13 front of her mirror as AROGANT was seen doing so numerous times throughout the real
14 GOPRO video recordings.
15
16
17
18

19 At the preliminary hearing, the County of Los Angeles Sheriff's Department,
20 County of Los Angeles District Attorney's Office Brian Mark Rosenberg, and rogue
21 peace officer Billy Khounthavong further framed him AROGANT by lying about the
22 length of Jennifer Hutton's first 911 call length, and also lying that her first call ended at
23 10:07 a.m. and her second call commenced between 10:09 a.m. and 10:10 a.m. LIARS!
24 The People's own CAD report shows that Hutton's second 911 call commenced at 10:08
25 a.m., and even the prejudiced judicial officer Michael Villalobos did not dispute during
26 trial with AROGANT'S argument and presentation of exculpatory evidence that showed
27 that Hutton's first call ended at approximately 10:07 a.m. and 50 seconds. Thus, the time
28 gap between the end of Hutton's first 911 call and the beginning of her second 911 call
was approximately 30 seconds.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1
2
3 At the preliminary hearing on April 4, 2023, and April 5, 2023, in furtherance of
4 the County of Los Angeles' conspiracy to frame AROGANT for a violent crime that he
5 never committed. Brian Mark Rosenberg, County of Los Angeles District Attorney's
6 Office, County of Los Angeles Sheriff's Department, and Billy Khounthavong presented
7 to the State of California Alhambra Superior Court reckless broken up and altered
8 GOPRO video recordings GL010586, GLO10587, GL010588, and GL010589. The
9 county of Los Angeles Sheriff's Department's Southern California High Tech Task Force
10 illegally did this according to their job duties and descriptions. NONE OF THEM HAD
11 ANY BUSINESS TOUCHING AND ALTERING AROGANT'S ENTIRELY
12 EXCULPATORY GOPRO VIDEO RECORDINGS!
13

14 On or about April 17, 2023 during his felony information arraignment
15

16 On October 17, 2023, AROGANT filed a Motion to Compel the County of Los
17 Angeles District Attorney's Office and Brian Mark Rosenberg (hereinafter "MARK or
18 MARK Rosenberg") to turn over and disclose an electronic copy of the phony and bogus
19 GOPRO video recording GL010586 that falsely portrayed AROGANT shutting off his
20 GOPRO. Similar to many motions filed by AROGANT in the Alhambra Superior Court
21 regarding the County of Los Angeles District Attorney's Office turning over both
22 exculpatory original GOPRO video recordings and impeaching phony County of Los
23 Angeles Sheriff's Department phony LASD-created GOPRO video recordings
24 GLO010586 and GL010587 prejudice the State of California judicial officer Michael
25 Villalobos either never heard AROGANT'S motion to appeal by holding a hearing or (b)
26 he recklessly denied it on the Superior Court record while refusing to hold a hearing on
27 the motion to compel.
28

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 In early October 2023, AROGANT filed a motion directly with State of California
2 Pasadena Superior Court prejudiced judicial officer Suzette Clover requesting that she
3 provide him with a certified copy of Billy Khounthavong's phony and FORGED search
4 warrant pursuant to California Evidence Code section 1530. Prejudiced, biased and
5 RACIST State of California judicial officer Suzette Clover recklessly, wantonly,
6 willfully, maliciously, and callously violated AROGANT's United States Fourteenth
7 Amendment constitutional rights and California Constitution Article I, § 7 constitutional
8 rights by denying AROGANT's motion by recklessly failing to provide AROGANT with
9 a certified copy of rogue Peace Officer's Billy Khounthavong's alleged electronically
10 filed February 22, 2023 search warrant, and RACIST Judicial Officer Suzette Clover
11 LIED that she issued Billy Khounthavong's phony search warrant, and she lied that it
12 was done electronically.
13
14
15

16 Suzette's Clover October 2023 ruling that she issued rogue peace officer Billy
17 Khounthavong's phony search warrant can be proven false based on the fact that the
18 **FORGED SEARCH WARRANT** was missing the following PASADENA SUPERIOR
19 COURT electronically stamped information that would PROVE it was REAL:
20
21

22 **Electronically FILED by**
23 **Superior Court of California,**
24 **County of Los Angeles**
25 **02/22/2023 _____ PM**
26 **David W. Slayton,**
27 **Executive Officer/Clerk of Court**
28 **CLERK NAME HERE, Deputy Clerk**

Additionally, pursuant to the Trial Court Records Manual Revised 2020, Judicial
Council of California, on page 115 of 143, page 132 of 143, and 21 of 143, the rogue

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 Peace Officer Billy Khounthavong and Suzette Clover's search warrant is clearly proven
2 to be counterfeit and was never issued since the Pasadena Superior Court has no record of
3 it existing while State of California Pasadena Superior Court was required pursuant to
4 California Government Code Section 68152 to retain a copy of it at the Pasadena
5 Superior Court until 2033. Further, on page 132 of 143 in the Trial Court Records
6 Manual Revised 2020, the Judicial Council of California states that pursuant to California
7 Penal Code Section 1534, the Pasadena Superior Court was required to make Billy
8 Khounthavong and Suzette Clover's counterfeit and make-believe search warrant open to
9 the public. Pasadena Superior Court has no electronic or physical paper copy records of
10 rouge Billy Khounthavong and RACIST Suzette Clover's PHONY search warrant
11 because it was never filed in the Pasadena Superior Court and it does not exist.
12
13
14

15 On November 28, 2023 AROGANT emailed an MP4 formatted electronic copy of
16 the uninterrupted and continuous 14-minute REAL GoPro video recording that proved
17 his factual innocence by clear and convincing evidence to Ned Harlan
18 (ned.harlan@doj.ca.gov, Nishdeep Singh (nishdeep.singh@doj.ca.gov
19 nishdeep.singh@doj.ca.gov), Robert Bonta (robert.bonta@doj.ca.gov),
20 OPSCchiefsOffice@doj.ca.gov, Peter Halloran (peter.halloran@doj.ca.gov) , Alisha
21 Carlile (alisha.carlile@doj.ca.gov), Vincent Bonotto (vincent.bonotto@doj.ca.gov),
22 Glenn Prudent (glenn.prudent@doj.ca.gov), Daniel Olivas (daniel.olivas@doj.ca.gov),
23 Giam Nguyen (giam.nguyen@doj.ca.gov), Chad Stegman (chad.stegman@doj.ca.gov),
24 Stephen Lew (stephen.lew@doj.ca.gov), Christopher Findley
25 (christopher.findley@doj.ca.gov), Darrell Warren Spence (darrell.spence@doj.ca.gov),
26 and many other State of California employed law enforcement attorneys. The real
27 GOPRO video recording was also electronically served upon George Gascon
28 (ggascon@da.lacounty.gov), Sharon Lee Woo (swoo@da.lacounty.gov), James William

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 Garrison (jgarrison@da.lacounty.gov), Stephanie Pearl Mire (smire@da.lacounty.gov),
2 Victor Manuel Rodriguez (vrodriguez@da.lacounty.gov), Ronald Millard Geltz
3 (rgeltz@da.lacounty.gov), Needra Jenkins (njenkins@counsel.lacounty.gov), Nicole
4 Davis Tinkham (ndavis-tinkham@counsel.lacounty.gov), Judy Welch Whitehurst
5 (jwhitehurst@counsel.lacounty.gov) and over seventy-five other County of Los Angeles
6 employed criminal prosecutors and members of the Los Angeles County Office of
7 Counsel. The real 14-minute GoPro video recording was also emailed to RACIST and
8 LYING State of California Los Angeles Superior Court expert witness Thomas Leo
9 Guzman-Sanchez. (tgsvrimumuzic@dancemaster.com, r@danmaster.com, and
10 godaddy@dancemaster.com. As of June 14, 2024, all above emailed State of California
11 and County of Los Angeles criminal and civil attorneys have willfully, recklessly,
12 wantonly, maliciously, and callously with under color of law callous indifference to the
13 federally protected constitutional civil rights of AROGANT HOLLYWOOD recklessly
14 failed to intervene based on Brian Mark Rosenberg's actions, and misconduct of framing
15 AROGANT for a serious crime he did not commit by manipulating, altering and
16 tampering with AROGANT'S entirely exculpatory GOPRO video recording evidence.
17
18
19
20

21
22 As of June 14, 2024, all above emailed State of California and County of Los
23 Angeles criminal and civil attorneys have willfully, recklessly, wantonly, maliciously,
24 and callously with under color of law callous indifference to the federally protected
25 constitutional civil rights of AROGANT HOLLYWOOD recklessly respond to
26 AROGANT'S email by electronic mail, facsimile, physical mail, or telephone based on
27 Brian Mark Rosenberg's actions, and misconduct of framing AROGANT for a serious
28 crime he did not commit by manipulating, altering and tampering with AROGANT'S
entirely exculpatory GOPRO video recording evidence, in furtherance of all emailed
Defendants conspiring with County of Los Angeles District Attorney's Office and

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

County of Los Angeles Sheriff's Department to recklessly violate AROGANT'S constitutional civil rights.

On November 28, 2023, in addition to AROGANT emailing the real GOPRO video recording to the above-stated criminal prosecutors and state of California attorneys, these same criminal prosecutors and state attorneys also received a web address link that redirected them to AROGANT's Instagram account, where they could view the real video recording that was previously uploaded to his Instagram account.

SEE BELOW THE INSTAGRAM VIDEO LINKS TO THE ORIGINAL FEBRUARY 21, 2023, GOPRO VIDEO RECORDINGS ATTACHED HERETO.

https://www.instagram.com/reel/Czs0EpgOsSm/?utm_source=ig_web_copy_link&igshid=MzRlODBiNWFlZA==

https://www.instagram.com/reel/Cz0sb6auaos/?utm_source=ig_web_copy_link&igshid=MzRlODBiNWFlZA==

On December 28, 2023, Hollywood filed a motion to withdraw his No Contest guilty plea.

On January 12, 2024, Hollywood filed a second motion to withdraw his No Contest guilty plea and he withdrew his No Contest guilty plea motion filed on December 28, 2023 in the illegal and frivolous, violent and serious felony case GA114055.

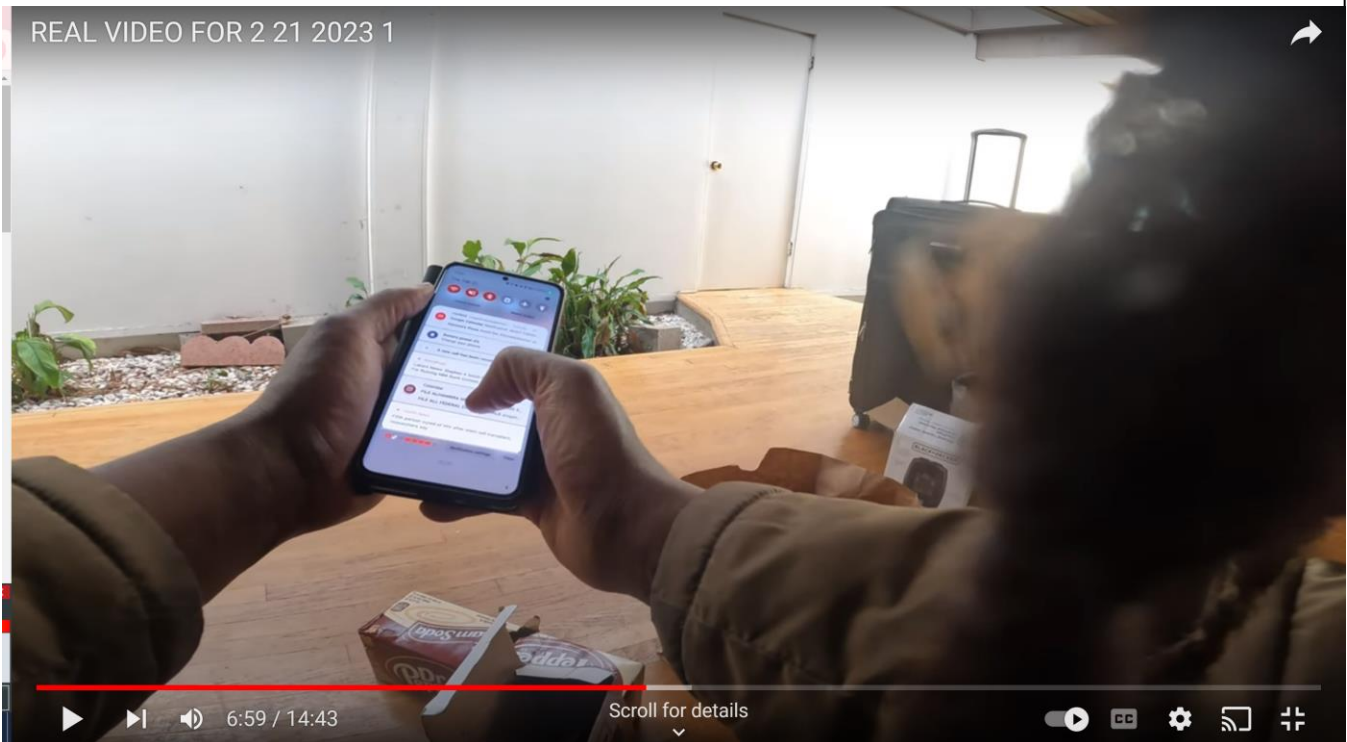
On February 2, 2024, the People and RACIST Deputy District Attorney Brian Mark Rosenberg admitted and presented a GOPRO video recording that depicted and portrayed Arogant Hollywood shutting off his GOPRO camera using a bare and naked

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 right arm. In the People's LASD Peace Officers' body camera video recordings,
2 Hollywood is seen wearing a long-sleeved jacket. During Jennifer Hutton-Heger's first
3 911 call, she described Arogant Hollywood's clothing as baggy pants and long-sleeved
4 shirt. Thus, People's phony GOPRO video recording GL010586 which depicts and
5 displays Hollywood wearing a tank-top and also different pants proves by clear and
6 convincing evidence that the People's GOPRO video recording is phony and was NOT
7 created by Arogant Hollywood on February 21, 2023. In original GOPRO video
8 recording, there is sound. In People's Artificial Intelligence-powered video recording,
9 there is no sound. See now Verified Appendix of Exhibits, Exhibit 1, and also shown
10 here:



Images taken from AROGANT's real video recorded on February 23, 2023 show him wearing a long sleeved coat not a tank top as is shown in People and LASD'S phony

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 video recordings manipulated to frame AROGANT for a serious felony that all emailed
2 County of Los Angeles peace officers and attorneys knew that AROGANT never
3 committed.

4
5 On February 2, 2024, the Superior Court held an evidentiary hearing on
6 Hollywood's motion to withdraw his No Contest plea.

7
8 On February 2, 2024, Deputy District Attorney MARK Rosenberg both testified
9 and presented the manipulated, altered, bogus and phony GOPRO video recording
10 GL010586 created by the Los Angeles County Sherriff's Department (hereinafter
11 "LASD").

12 The bogus video displayed and depicted Hollywood shutting off his GOPRO
13 camera. The bogus video featured an artificial intelligence-powered Arogant Hollywood
14 repeatedly touching his GOPRO camera multiple times before finally stopping the
15 recording.

16 The evidence clearly shows that the GOPRO video GL010586 is a phony for the
17 following reasons:

- 18
- 19 1. In People's phony LASD-created GL010586, Hollywood is seen shutting off
20 his GOPRO camera while his entire right arm can be seen to be bare and naked,
21 without clothing. In People's phony GL010586, Hollywood is clearly seen
22 wearing a dark-colored tank top.
 - 23 2. In the original GL010586 video recording, Hollywood is never seen shutting off
24 his GOPRO camera. In the original GL010586 video recording, Hollywood is
25 seen to be wearing a long-sleeved shirt.

26 On February 2, 2024 rogue, racist, biased, and prejudiced presented false testimony
27 while showing an altered GOPRO video recording and asking AROGANT:
28 How did you get over to that door on the other side?

GREAT QUESTION MARK! THE ANSWER IS YOU SHOULD BE IN JAIL!

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 Because while the phony GOPRO video recording that MARK showed the
2 Superior Court on February 2, 2024 showed Arogant Hollywood walking near the front
3 door of Jennifer Hutton-Herger. What it did not show was AROGANT standing in
4 Hutton's mirror wearing a long sleeve coat and his GOPRO camera. PROVING THAT
5 PEOPLE'S DOCTORED AND SPLICED GOPRO VIDEO RECORDINGS presented
6 falsely to the Superior Court on April 4, 2023, April 5, 2023, and February 2, 2024 ARE
7 PHONIES! In People's LASD created phony GOPRO VIDEO RECORDINGS
8 AROGANT is seen walking around a dark house wearing a tank top. In the real GOPRO
9 video recording AROGANT is seen standing in Hutton's mirror wearing his GOPRO
10 camera and a long sleeved shirt, and the background shows plenty of natural light unlike
11 People's phony GOPRO video recordings. This occurs at 8 minutes and 33 seconds into
12 AROGANT's real GOPRO video recording GLO10586.
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28



VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

At ten minutes into GOPRO video recording GLO10587 AROGANT can again be seen standing in front of Hutton's mirror. The GOPRO video recording again shows AROGANT wearing a long sleeved coat and his GOPRO camera, proving that his video recording was one continuous video broken up and manipulated by County of Los Angeles peace officers. AROGANT is seen again standing in front of Hutton's mirror at 10:18 second into the video recording. See now Verified Appendix of Exhibits, Exhibit 2.



On February 2, 2024 AROGANT showed the Superior Court his original GOPRO video recording that showed an a reflection of AROGANT again wearing a long sleeve coat. It would have been impossible for AROGANT to had been wearing a long sleeved coat and tank top on the same date and same time! See now Verified Appendix of Exhibits, Exhibit 3, attached herein:

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055



On or about February 5, 2024, Arogant Hollywood left a voicemail requesting that Alhambra Deputy In Charge Victor Manuel Rodriguez provide to co-counsel Neil Opdahl-Lopez a copy of People's phony GOPRO video recordings GL010586 and GL010587 that was played, presented and admitted at the evidentiary hearing of February 2, 2024.

On or about February 6, 2024, Arogant Hollywood left a voicemail requesting that Alhambra Deputy District Attorney Cindi Park provide to co-counsel Neil Opdahl-Lopez a copy of People's phony GOPRO video recordings GL010586 and GL010587 that were played, presented and admitted at the evidentiary hearing of February 2, 2024.

On or about February 7, 2024, co-counsel Neil Opdahl-Lopez emailed Deputy District Attorney Brian MARK Rosenberg requesting that he provide him with a copy of LASD-created GOPRO video recording GL010586 showing Hollywood shutting off his GOPRO camera and was admitted as false evidence on February 2, 2024. MARK Rosenberg replied back that he was no longer handling the case. This is true, but it is

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 also true that Brian MARK Rosenberg is the only Deputy District Attorney in the County
2 of Los Angeles that has phony LASD-created GOPRO video recordings GL010586 and
3 GL010587 electronically stored on his lap-top computer. Not even Alhambra Deputy In
4 Charge Victor Manuel Rodriguez has access to the phony GOPRO video recordings
5 GL010586 and GL010587.

6 On February 16, 2024, Arogant Hollywood contacted the Office of new Los
7 Angeles County District Attorney Office Family Violence Division Deputy in Charge
8 Janice Johnson by dialing 213-257-2185 using a 3-way conference call made by Alison
9 Fairchild. Hollywood left a message with Ms. Johnson's legal secretary Estra Malda and
10 requested that Ms. Johnson contact co-counsel Neil Opdahl-Lopez at 626-429-6578 about
11 providing him with a copy of altered GOPRO video recordings played by People on
12 February 2, 2024.

13 On or about February 16, 2024, Arogant Hollywood called Alhambra Deputy in
14 Charge Victor Manuel Rodriguez by dialing 626-308-5302 and requesting to be
15 transferred to his voicemail. Hollywood left a voicemail for Victory Rodriguez
16 requesting he provide co-counsel Neil Opdahl-Lopez with a copy of altered LASD-
17 created GOPRO video recording GL010586 that shows Hollywood shutting off his
18 GOPRO camera and was played at the court evidentiary hearing on February 2, 2024.

19 Between February 5, 2024 and February 23, 2024 both Hollywood and co counsel/
20 Neil Opdahl- Lopez requested and demanded by both email and telephone that people
21 turn over copies of phony GOPRO recordings GL01586 and GL01587 that was shown,
22 presented, and admitted into the superior court on April 4th, 2023, April 5th, 2023,
23 February 2nd, 2024. Yet, the people have still willfully, recklessly, wantingly,
24 maliciously, and callously failed to do so.

25 The people of Brian MARK Rosenberg willfully, recklessly, wantonly, maliciously
26 and callously failed to provide Arogant Hollywood, co-counsel Neil Opdahl-Lopez,
27 Private Investigators Joel Wyenn and Carlos A. Jackson and RACIST and lying court-
28 appointed expert witness Thomas Juzman-Sanchez, disclose and turn over an electronic
copy of phony LASD-created GOPRO video recordings GL010586 and GL010587.
None of the previously-named Hollywood criminal defense members should have ever
had to request phony GOPRO video recording evidence from MARK Rosenberg because
pursuant to Los Angeles County District Attorney Offices' Policies, Practices and

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

Procedures any and all audio and video evidence is required to be uploaded and made immediately available to the criminal defense members to download on evidence.com.

On January 30, 2024, the Los Angeles County Sheriff's Department released its Police Archival and Retrieval System Manual, better known as the "PARS Public"). Manual of Policy and Procedures (MPP), Volume 2-Organization and Functions, Chapter 5-Detective Division, policy 2-05/030.00-Fraud & Cyber Crimes Bureau provides:

This Bureau is comprised of specialized details responsible for investigating complex cases involving the criminal exploitation of commerce, finance and/or technology by means of false representation or intentional deception for unlawful monetary gain.

On January 30, 2024, the Los Angeles County Sheriff's Department released its Police Archival and Retrieval System Manual, better known as the "PARS Public"). Manual of Policy and Procedures (MPP), Volume 2-Organization and Functions, Chapter 5-Detective Division, policy 2-05/030.10-Fraud Detail provides:

This detail investigates complex cases that involve a deliberate deception or deceitful pretenses practiced to secure unlawful monetary gain. These cases generally involve the manipulation of records or documents, a high-dollar loss, and/or multiple victims. Cases investigated by this detail include the following:

- buncos;
- consumer frauds;
- grand theft embezzlements;
- theft of real property (real estate);
- theft by false pretense;
- theft by trick or device;
- planned insolvency (bust-out);
- elder financial abuse or fraud;
- theft of trade secrets; and

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

- pyramid or ponzi schemes.

Responsibilities of this detail include the following:

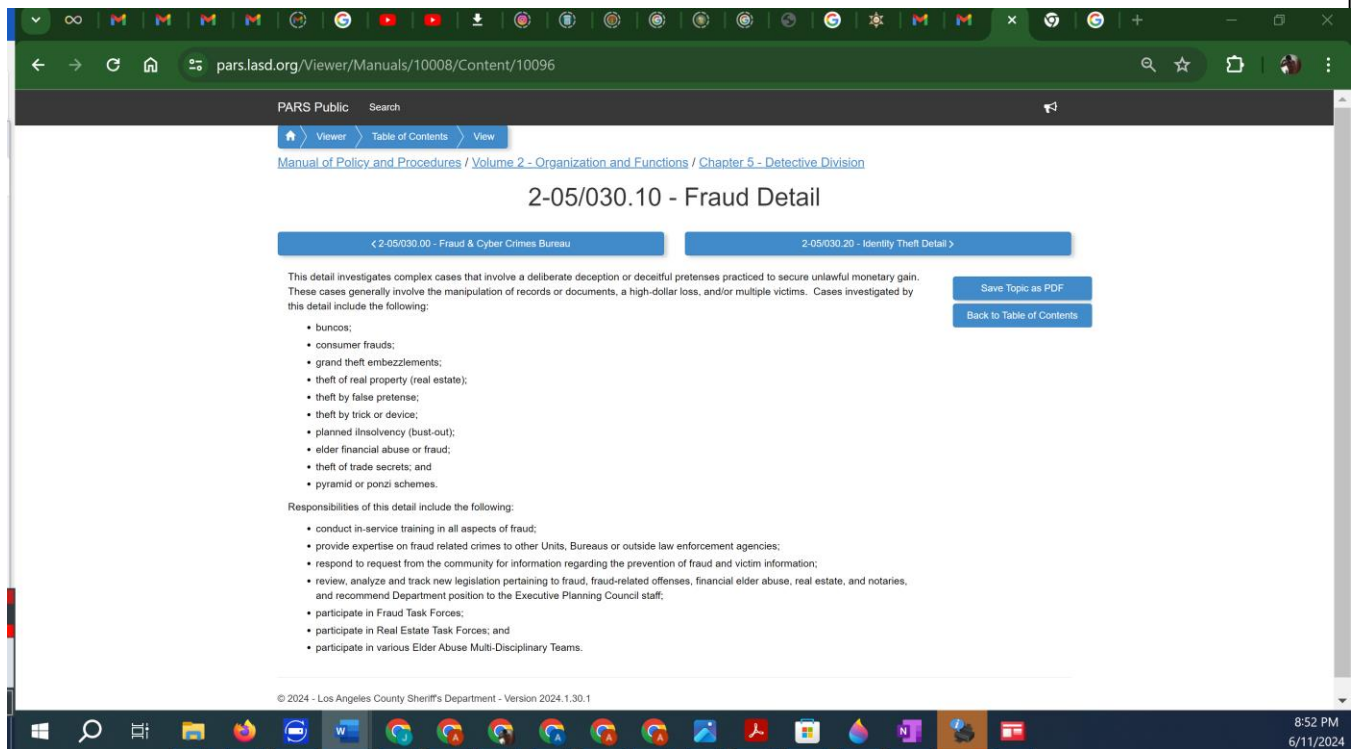
- conduct in-service training in all aspects of fraud;
- provide expertise on fraud related crimes to other Units, Bureaus or outside law enforcement agencies;
- respond to request from the community for information regarding the prevention of fraud and victim information;
- review, analyze and track new legislation pertaining to fraud, fraud-related offenses, financial elder abuse, real estate, and notaries, and recommend Department position to the Executive Planning Council staff;
- participate in Fraud Task Forces;
- participate in Real Estate Task Forces; and
- participate in various Elder Abuse Multi-Disciplinary Teams.

See now Verified Appendix of Exhibits, Exhibit. See also Los Angeles County Sheriff's Department PARS Public Manual of Policy and Procedures (MPP), Volume 2-Organization and Functions, Chapter 5-Detective Division, policy 2-05/030.10-Fraud Detail herein below:

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055



III. LEGAL ARGUMENT

Under 1054.1, the Prosecuting Attorney shall disclose to the Defendant or his or her attorney all evidence in his possession or in the possession of its law enforcement agencies working to prosecute Hollywood. See *In re Littlefield*, 5 Cal.4th 122 129 (1993).

The People and Brian MARK Rosenberg had a *Brady* duty to disclose and turn over phony LASD-created GOPRO video recordings GL010586 and GL0101587 because these videos could and would have been used to impeach false testimony of LYING Billy Khounthavong that phony GOPRO video recordings GL010586 and GL0101587 were retrieved and downloaded from Arrogant Hollywood's GOPRO camera. See *People v. Little*, 59 Cal.4th 426, 433 (1997).

Throughout this case the people of Mark Rosenberg have been in full control. Hollywood has never had an opportunity to present his evidence and he has never had an

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 opportunity to examine people's phony GOPRO video recordings GL017586 in the
2 superior court.

3
4 The People and MARK Rosenberg's Constitutional duty that required them to
5 disclose impeaching evidence to Hollywood was independent from their statutory duty to
6 provide discover under Section 1054.1. See *Izazaga v. Superior Court*, 54 Cal.3d 356 at
7 p. 378 (1991).

8 Evidence that is material under *Brady* must be disclosed to the Defense,
9 notwithstanding any failure of the Defense to enforce its statutory right to discovery. See
10 *People v. Jordan*, 108 Cal.App.4th 349, 359 (2003).

11 *Brady* imposed the duty on MARK Rosenberg and the People to disclose phony
12 GOPRO video recordings voluntarily without Hollywood requesting videos and these
13 phony LASD-created video recordings should have been uploaded to evidence.com back
14 in March 2023.

15 On page 9 of Hollywood's Motion to Compel filed on October 17, 2023, he
16 requested that the Superior Court order the following:

17
18 2. All 16 GOPRO video recordings admitted at the preliminary hearing including
19 GOPRO video of Hollywood shutting off his GOPRO camera provided to Defendant in
20 playable MP4 format.

21 Numerous United States Supreme Court full courts have ruled that the People and
22 MARK Rosenberg must turn over and disclose GOPRO video recording of Hollywood
23 shutting his GOPRO camera while wearing a tank-top that exposes bare right arm which
24 was played, presented and admitted as false evidence against Hollywood on April 4,
25 2023, April 5, 2023, and February 2, 2024.

26 **We hold that suppression by the Prosecution of evidence favorable to an**
27 **Accused upon request violated due process where the evidence is material to either**
28 **guilt or innocence irrespective of the good faith or bad faith of the Prosecution.**

Brady v. Maryland, 373 U.S. 83, 83 S.Ct. 1194, 10, L.Ed.2d 275 (1965).

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 The most important question in this unconstitutional and frivolous case now is if
2 Hollywood did “it” as MARK Rosenberg told the Superior Court on July 7, 2023 then
3 why are Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James William
4 Garrison, Ronald Millard Gertz, Cindy Park, George Gascom, Stephanie Pearl Mire,
5 Janice Johnson, Darci Purvis, LASD, Los Angeles County District Attorney’s Office and
6 County of Los Angeles working tirelessly to frame Hollywood by presenting and
7 admitting into criminal Superior Court a phony GOPRO video recording showing camera
8 angles that were impossible for Hollywood to have recorded while his GOPRO camera
9 was mounted on his chest and while he was also wearing different clothing than he had
10 on February 21, 2023; as heard and seen on People’s 911 audio recording and police
11 body cam videos.

12 The People’s phony GOPRO video recording GL010586 (which was never turned
13 over to the Defense) could have been used to impeach false testimony by Billy
14 Khounthavong that this phony GOPRO video recording was never recorded by
15 Hollywood and he testified to falsely on April 5, 2023. See

16 The People in Rosenberg had a bravely duty to disclose and turn over phony
17 GOPRO video recordings LASD created GL010586 and GL01587. Those videos could
18 and would can be used to impeach false testimony that phony GOPRO video recording
19 were retrieved from Hollywood’s GOPRO camera. *People v. Little, supra*, 59 Cal.App.4
20 426, 433 (1997).

21 After its *Brady* decision, United States Supreme Court full courts have ruled that
22 the People and Mark Rosenberg must turn over and disclose GOPRO video recordings of
23 Hollywood shutting off his GOPRO camera while wearing a tank top that exposes his
24 bare and naked right arm which was played, presented, and admitted as false evidence
25 against Hollywood on February 4, 2023, April 5, 2023 and February 22, 2024.

26 **If evidence highly probable is in his file, it should be presumed to**
27 **recognize to its significance if he overlooked it.**

28 *United States v. Agurs*, 427 U.S. 97, 112, 96 S.Ct. 2392, 49 L.Ed.2d 342
(1976).

Nearly a decade after its decision in ruling in *Agurs*, the Supreme Court took the
Brady doctrine further by ruling that criminal prosecutors had an obligation to disclose

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 impeaching evidence to a criminal defendant even if the defendant never requested the
2 favorable evidence.

3
4 **The Strickland formulation of the Agurs test for materiality sufficiently**
5 **flexible to cover the “no request”, “general request”, and “specific**
6 **request” case of prosecutorial failure to disclose the evidence favorable**
7 **to the Accused. The evidence is material only if there is a reasonable**
8 **probability that, had the evidence been disclosed to the Defense, the**
9 **result of the proceeding would have been different.**

10 *United States v. Bagley*, 473 U.S. 667, 682, 105, S.Ct. 3375, 77 L.Ed.2d. 481
11 (1985).

12 *Bagley* was very similar to the frivolous and unconstitutional case at bar because
13 the government’s reckless failure to disclose material and favorable evidence that could
14 have been used to impeach testimony of government witnesses resulted in a miscarriage
15 of justice.

16 The obligation of MARK Rosenberg and the People to disclose favorable,
17 impeaching evidence under *Brady* includes their phony GOPRO video recordings
18 evidence that should have been used to impeach the false testimony of Billy
19 Khounthavong that phony GOPRO video recording GL010586 showing Hollywood
20 shutting off his GOPRO camera while wearing different clothing was retrieved and
21 downloaded from Hollywood’s original GOPRO camera. See now, *Strickler v. Greene*,
22 527 U.S. 263, 280-281, 119 S.Ct. 1936, 144 L.Ed.2d 286 (1999); *United States v. Bagly*,
23 *supra*, 473 U.S. 667, 105 S.Ct. 3375, at 682.

24 MARK Rosenberg: and the videos that you retrieved,
25 how did you get those?

26 Billy Khounthavong: I submitted the GOPRO to our
27 hi-tech bureau and detectives from that bureau down-
28 loaded the data from the GOPRO itself, and I retrieved
it from them.

1 See now People's Preliminary Transcript of Proceedings, Day 2, April 5, 2023 at
2 page 23.

3
4 It is highly unlikely that lying Billy Khounthavong retrieved a phony video of
5 Hollywood shutting off his GOPRO camera while he was wearing clothing different from
6 that shown in the original GOPRO video.

7 Hollywood's allegation that LASD hi-tech bureau copied and pasted video frame
8 sequences from his GOPRO video recordings recorded before February 21, 2023 and
9 then pasted those previously recorded video recordings video frame sequences to the very
10 end of GL010586 was confirmed after the People and MARK Rosenberg presented and
11 admitted a phony LASD-created GL010586 video recording that displayed and showed
12 Hollywood wearing different clothing than he had on on February 21, 2023.

13 Over a decade later after its ruling in *Bagly*, the United States Supreme Court
14 continued ruling that the government must disclose evidence favorable to Defendant.

15 **A reasonable probability of a different result is one in which the**
16 **suppressed evidence undermines confidence of the trial.**

17
18 *Kyles v. Whitley*, 514 U.S. 419, 434, 115, S.Ct. 1555, 131, L.Ed.2d 490
19 (1995).

20
21 The People and MARK Rosenberg's willful, malicious, wanton, reckless and
22 callous failure to disclose and turn over electronic copies of phony of GOPRO recordings
23 GL010586 and GL010587 that were presented and admitted into the Superior Court on
24 April 4, 2023, April 5, 2023, April 2, 2024 violated Hollywood's due process clause
25 United States' Fourteenth Amendment constitutional rights and the suppression of this
26 impeaching evidence undermined the confidence of the bench trial and preliminary
hearing in the frivolous and unconstitutional case GA114055.

27 On April 4, 2023, April 5, 2023, and February 2, 2024, biased Judicial Officer
28 Michael Villalobos watched and observed a GOPRO video that depicted Arogant
Hollywood shutting off his GOPRO camera inside Jennifer Hutton-Heger's home using a
bare and naked right arm.

Merriam-Webster's Dictionary of Law definition of impeachment evidence is: .

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

evidence that may be used to impeach a witness because it tends to harm the witness' credibility.

The reason why the People's phony LASD-created GOPRO video recording GL010586 shows Hollywood wearing different clothing than he was wearing on February 21, 2023 is because rouge and RACIST Southern California Hi-Tech Task Force Peace Officers cannot find any GOPRO video recordings of Hollywood shutting his GOPRO camera off on February 21, 2023. Thus, the cat is now out of the BAG.

Hollywood could have impeached Billy Khounthavong by simply playing the phony video recording while Khounthavong was under cross-examination by asking him why was Hollywood seen in phony LASD-created GOPRO video recording wearing different clothing than he had on on February 21, 2023. MARK Rosenberg thought about this as well and it is the reason why he violated his oath of office as a Court Officer by never turning over phony LASD-created GOPRO video recordings GL010586 and GL010587 to any member of Hollywood's defense team, including co-counsel Neil Opdahl-Lopez, court-appointed private investigators Carlos A. Jackson and Joel Wyenn, LYING and RACIST expert witness Thomas Guzman-Sanchez between March 2023 and February 2, 2024, nearly a year.

A Brady claim has three elements: "[1.] The evidence at issue must be favorable to the Accused either because it is exculpatory or because it is impeaching. [2.] That evidence must have been suppressed by the State, either willfully or inadvertently, and [3.] Prejudice must have ensued."

Banks v. Driefke, 540 U.S. 668, 691, 124 S.Ct. 1256, 157, L.Ed.2d 1166 (2004).

In the frivolous case at bar, the three elements of *Brady* have been met. The People's phony GOPRO video recordings GL010586 and GL010587 are favorable to Hollywood because they are impeaching. The People and MARK Rosenberg have willfully, recklessly, wantonly, maliciously, and callously suppressed phony GOPRO video recordings GL010586 and GL010587, and Hollywood has suffered prejudice by

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

being held to answer and convicted because of the People's willful, reckless, malicious, and callous suppression of this favorable, impeaching evidence.

Brady v. Maryland, 373 U.S. 83, 83 S.Ct. 1194, 10, L.Ed.2d. 275 (1965) this court held that the government violated the Constitution's Due Process Clause "if it withholds evidence favorable to the Defense and material to the Defendant's guilt or punishment."

Smith v. Cain, 565 U.S. 73, 132 S.Ct. 627 (2012)

In the unconstitutional and frivolous case GA114055, the People and MARK Rosenberg have recklessly, willfully, wantonly, maliciously and callously violated Hollywood's Fourteenth Amendment Due Process Clause United States constitutional rights by withholding material impeaching evidence that is and was extremely favorable to Hollywood in the form of phony LASD-created GOPRO video recordings that display and show Hollywood filmed in camera angles that were impossible for him to have recorded while his GOPRO camera was mounted on his chest, and in the form of phony LASD-created GOPRO video recordings showing and displaying Hollywood inside Jennifer Hutton-Heger's home when wearing different clothing that he had on on February 21, 2023.

Brady imposed a duty on MARK Rosenberg and the People to disclose phony LASD-created GOPRO video recordings voluntarily without Hollywood requesting phony video recordings, and these impeaching evidence video recordings should have been uploaded to evidence.com by Brian MARK Rosenberg, LASD, and the People back in March, 2023. Biased Judicial Officer Michael Villalobos and the Superior Court abused their discretion and exceeded their jurisdiction by working in concerted collusion to RAILROAD Hollywood by recklessly, willfully, wantonly, maliciously and callously allowing the People and MARK Rosenberg to callously and recklessly present and admit into a criminal Superior Court phony LASD-created GOPRO video recordings that depict and display Hollywood shutting off his GOPRO camera while being filmed and recorded in impossible camera angles while wearing different clothing than what People's own evidence proved and showed Hollywood had on February 21, 2023. It was extremely

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 unfair for biased Judicial Officer Michael Villalobos to willfully, recklessly, wantonly,
2 maliciously and callously allow the People to present and admit a phony LASD-created
3 GOPRO video recording on April 4, 2023, April 5, 2023, and February 2, 2024, to allow
4 a Peace Officer to testify that this phony LASD-created video recording was retrieved
5 and downloaded from Hollywood's GOPRO camera, while recklessly and callously
6 never ORDERING or requesting People to turn over and disclose a copy of impeaching
7 evidence so Hollywood could have examined phony video recording and used the
8 impeaching video recording evidence to impeach and discredit false testimony by Billy
9 Khounthavong that phony LASD-created video recording GL010586 was retrieved and
downloaded from Hollywood's GOPRO camera.

10 This Court must grant immediate release to the railroaded and prejudiced
11 Hollywood by ORDERING that phony LASD-created video recordings GL010586 and
12 GL010587 which were both presented and admitted as false evidence on April 4, 2023,
13 April 5, 2023, and February 2, 2024 be turned over and disclosed to innocent and
14 wrongfully incarcerated Arogant Hollywood immediately.

15 Pursuant to *Brady v. Maryland*, 373 U.S. 83, 83 S.Ct. 1194, 10, L.Ed.2d 275
16 (1965); *United States v. Agurs*, 427 U.S. 97, 112, 96 S.Ct. 2392, 49 L.Ed.2d 342 (1976);
17 *United States v. Bagley*, 473 U.S. 667, 682, 105, S.Ct. 3375, 77 L.Ed.2d. 481 (1985);
18 *People v. Little*, 59 Cal.4th 426, 433 (1997); *Izazaga v. Superior Court*, 54 Cal.3d 356 at
19 p. 378 (1991); *People v. Jordan*, 108 Cal.App.4th 349, 359 (2003); and California Penal
20 Code Section 1054 *et seq*, the Superior Court and biased Judicial Officer Michael
21 Villalobos were required to, had a judicial duty to, and an obligation under the Fourteenth
22 Amendment of the United States Constitution to ORDER and COMPEL the People and
23 MARK Rosenberg to immediately turn over and disclose an electronic copy of People's
24 LASD-created video recordings that could and would have been used to impeach the
25 false testimony of State Government witness Billy Khounthavong that the phony GOPRO
26 video recording GL010586 that depicted and displayed Hollywood shutting off his
27 GOPRO camera wearing different clothing was retrieved and downloaded from
28 Hollywood's GOPRO camera.

The People and MARK Rosenberg

The California Penal Code and *Brady v. Maryland* imposes a statutory duty for the
People to turn over and disclose impeaching evidence to Hollywood independent from

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 their statutory duty to provide discovery under California Penal Code Section 1054.1. See
2 *Izazaga v. Superior Court, Supra*, 54 Cal.3d 356 (1991) at p. 378.

3
4 This Court must order the People to provide Hollywood and co-counsel Neil
5 Opdahl-Lopez with a copy of LASD-created GOPRO recordings GL010586 and
6 GL010587 that were presented and admitted by the People on April 4, 2023, April 5,
7 2023, and February 2, 2024 as false evidence. This Court must order the People to
8 disclose and turn over the above-cited IMPEACHING video recordings pursuant to
9 *Brady v. Maryland, supra*, 373 U.S. 83, 83 S.Ct. 1194, 10, L.Ed.2d 275 (1965) and
10 *United States v. Bagley*, 473 U.S. 667, 682, 105, S.Ct. 3375, 77 L.Ed.2d. 481 (1985).

11 As a result of an act in furtherance of a conspiracy prohibited under any part of
12 section 1985, including clause 1 of section 1985. See 42 U.S.C. section 1985 (clause iii).

13 On January 9, 2024 and January 16, 2024, numerous deputy executive PUBLIC
14 PRETENDERS were emailed a REAL 14-minute GOPRO video recording and yet they
15 all failed to do anything to assist Hollywood by reporting Los Angeles District Attorney
16 Office's willful, reckless, wanton, malicious, and callous injustice of Arogant Hollywood
17 to Alhambra Superior Court. Accordingly, all emailed deputy PUBLIC PRETENDERS
18 and the PUBLIC PRETENDER will be sued in Federal District Court.

19 20 21 **IV. END OF EMAIL DEMANDING DISCOVERY**

22
23
24 INNOCENT and WRONGFULLY-CONVICTED CRIMINAL DEFENDANT
25 AROGANT HOLLYWOOD HEREBY DEMANDS that County of Los Angeles and Los
26 Angeles Sheriff's Department, Fraud and Cyber Crimes Bureau Southern California Hi-
27 Tech Taskforce (a joint law enforcement agency with Ventura County Sheriff's Office)
28 turn over and fully disclose an electronic copy of phony LASD-created GOPRO video
recordings GL010586 and GL010587 in fully-playable MP4 format:

1. All GOPRO video recordings given to LASD Peace Officer Billy
Khounthavong on March 20, 2023.

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1
2 The LASD Fraud and Cyber Crimes Bureau is located at

3
4 LASD Fraud and Cyber Crimes Bureau
5 11515 Colima Rd., Building A
6 Whittier, CA 90604

7 Additionally, the People and all emailed County of Los Angeles-employed
8 criminal prosecutors have a statutory and constitutional duty and obligation to
9 immediately turn over and disclose electronic copies of phony LASD-created GOPRO
10 video recordings GL010586 and GL010587 which depict and display inside Jennifer
11 Hutton-Heger's home with different clothing than he had on on February 21, 2023 by
12 doing the following:

13 1. By mailing a USB thumb flash drive containing impeaching GOPRO video
14 recording evidence to:

15 Neil Opdahl-Lopez, Esq.
16 Major, USMCR
17 (SBN: 277596)
18 473 Carnegie Drive, #200
19 San Bernardino, CA 92408

20 2. By uploading LASD-created GOPRO video recordings GL0108586 and
21 GL010587 onto evidence.com and then emailing criminal defense attorney access to
22 download impeaching criminal law evidence on evidence.com

23 Co-counsel Neil Opdahl-Lopez can be reached by text, mobile phone at:

24
25 626-429-6578
26 attorney@neilopdahl.com
27

28 Over the past 10 months, INNOCENT criminal defendant AROGANT
HOLLYWOOD has requested by emailing and telephoning business offices of James
William Garrison (jgarrison@da.lacounty.gov, (213) 257-3198); Sharon Lee Woo
(swoo@da.lacounty.gov, (213) 257-2928); Victor Manuel Rodriguez
(vrodriguez@da.lacounty.gov, (626) 308-5400); Ronald Millard Galtz

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

(rgaltz@da.lacounty.gov, (213) 257-2185); and George Gascon (ggascon@da.lacounty.gov, (213) 974-3512)) requesting that these County of Los Angeles criminal prosecutors turn over and disclose original GOPRO video recordings (now in the physical possession of AROGANT HOLLYWOOD) and impeaching GOPRO video recordings GL010586 and GL010587 (never disclosed by the People and MARK Rosenberg, yet requested in April, 2023 and October, 2023 criminal court pleadings), yet these previously-named criminal prosecutors have all willfully, recklessly, wantonly, maliciously, and callously failed to turn over and disclose original GOPRO video recordings and phony LASD-created GOPRO video recordings GL010586 and GL010587. Accordingly, this electronically-served DEMAND for discovery will be formatted on pleading paper and filed with Alhambra Superior Court.

YOU HAVE ALL BEEN HEREBY FOREWARNED.

RACIST and BIASED Deputy District Attorney MARK Rosenberg willfully, recklessly, wantonly, maliciously, and callously failed and refused to turn over an electronic copy of manipulated and phony LASD-created GOPRO video recordings GL010586 and GL010587 between March 28, 2023 and February 2, 2024. Accordingly, pursuant to Los Angeles District Attorney Office's policies, practices and procedures regarding disclosure to the Defense regarding video and audio evidence, the People have a constitutional and statutory duty to immediately upload an electronic copy of phony LASD-created GOPRO video recordings GL010586 and GL010587 (currently being electronically stored on the hard drive of Brian MARK Rosenberg's laptop computer) to evidence.com.

The People and emailed criminal prosecutors have until April 4, 2024 to comply with this emailed discovery demand upon being served by FAX, electronic mail, and by personal service of a California Process Server.

I declare under penalty of perjury under the laws and Constitution of California and United States that every word, sentence, paragraph, and page of this Criminal Law legal document is true and correct.

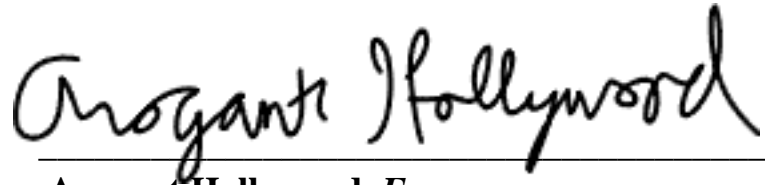
Date: February 28, 2024

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

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



Arogant Hollywood, Esq
Defendant-In-Propria-Persona

VERIFIED LEGAL BRIEF

Arogant Hollywood
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: aroganthollywoodgenius@gmail.com
Phone: 626.755.6442

Case No. GA114055

1 **VERIFICATION OF DEFENDANT AROGANT HOLLYWOOD**

2
3 United States of America
4 State of California
5 City of Los Angeles, California, within the County of Los Angeles

6 **I, AROGANT HOLLYWOOD**, being duly sworn, say:

7 I, AROGANT HOLLYWOOD, am a defendant in the frivolous and unconstitutional case
8 GA114055.

9 I have carefully and thoroughly read and examined the following:

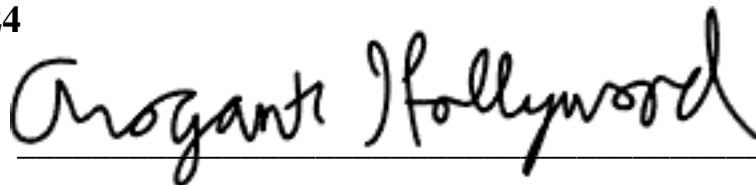
- 10
11 1. Wrongfully Incarcerated Defendant AROGANT HOLLYWOOD's EMAIL
12 DEMAND FOR DISCOVERY.

13
14 and I know the contents thereof. The facts stated therein are true and within my
15 personal knowledge, except as to those matters which are therein alleged on information
16 and belief, and as to those matters, I believe them also to be true.

17 If I were called upon to testify, I could and would testify competently as to the
18 matters stated herein and therein.

19 **I declare under penalty of perjury under the laws and constitution of California and**
20 **the United States that every word, sentence, paragraph, and page of this Civil Law**
21 **Verification of Defendant's Verified Demand for Jury Trial pursuant to the Seventh**
22 **Amendment of the United States Constitution.**

23
24 **Date: February 28, 2024**

25 

26 _____
27 **AROGANT HOLLYWOOD, Defendant in Lawsuit**

PROOF OF SERVICE

I, AROGANT HOLLYWOOD, DECLARE AS FOLLOWS:

1. I am over the age of 18 years old and a party to the frivolous and unconstitutional case GA114055.

2. If I were called upon to testify, I would and could competently testify to the TRUTH, THE WHOLD TRUTH, and nothing but the TRUTH.

3. On February 28, 2024, I served a copy of my Email Demand for Discovery by email and FAX to:

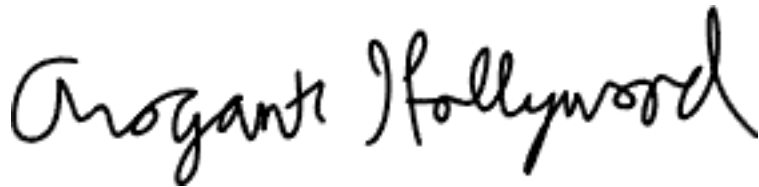
Victor Manuel Rodriguez
vrodriguez@da.lacounty.gov

and

Cindy Park
cpark@da.lacounty.gov
FAX: 1-626-281-4724

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

Date: February 28, 2024



AROGANT HOLLYWOOD, Defendant in Lawsuit

PROOF OF SERVICE BY AROGANT HOLLYWOOD

Hello,

My name is Carly Morris. I am a constituent of Supervisor Hanh, and a volunteer at the Carson Animal Shelter in Supervisor Mithcell's District.

I want to say I greatly appreciate the attention the Board has given to the animal overpopulation and crisis we are experiencing in Los Angeles County, and the plan that has been proposed by Supervisor Barger which focuses on both collaboration and a sustainable path forward.

In order to further this effort, I would like to propose an animal services commission which would serve in an advisory capacity to both the Board of Supervisors and Department of Animal Services staff.

Thank you for taking the time to read this.

October 28, 2024

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 West Temple Street
Hearing Room 381
Los Angeles, CA 90012

Mail to:
Los Angeles County Public Works
Waterworks Division
900 South Fremont Avenue
Alhambra, California 91803

Attention: Public Hearing on October 29, 2024, 9:30 AM
Subject: Protest of Pass-Through Adjustments Los Angeles County Waterworks Districts

Honorable Los Angeles County Supervisors,

I am writing to formally express my strong opposition to the proposed 10.1% rate increase for both Service Charges and Quantity Charges for the No. 36 Waterworks District. As a resident / customer, This increase is unjustified, especially considering our district will be paying the highest increase in the Santa Clarita Valley.

Twenty one years ago an agreement was struck with the Plamer Development to share in the cost of a well located near the intersection of Del Vale rd. and Hasley Canyon rd. This well was paid for by the residents through sire charges and the Palmer Development Co. Now I here we are not receiving water from that well. After repeated requests why we are no longer getting water from a well paid for by the customers of Dist. 36 id now asking for a 10.1 increase in water rates even though we are paying the highest rates in the SCV area. The District 36 supplies water to two areas of A22 or agricultural areas. The Castaic CSD set aside these areas for the purpose of small farms and ranches, lot are not less than 2 acers or average per development. Both farming and ranching require water for livestock, orchards and crops require water above residential developments.

In conclusion, the proposed rate is unjustified and will again make water in the district prohibitively expensive. I respectfully request that the No. 36 Waterworks District reconsider this rate increase and explore other solutions that will not unfairly burden Hasley Canyon and Val Verde residents. I look forward to your response and hope the board takes the concerns of its residents into account before making a final decision.

Thank you for your attention to this important matter. Sincerely,

Lloyd Carder

Address:
30530 Remington Rd.
Castaic CA 91384
6616002134