



**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		Favor	Cher I Arabalo	It is imperative that the BOS declares a state of emergency for Castaic/Hasley Hills/Val Verde residents for the Chiquita Canyon landfill disaster. The poisonous gases coming off the landfill are causing long term harm to the residents and our children. Children are having to sue to ask for help. This can no longer wait. What will it take to get you to act to help the children? This is environmental injustice. You did it for Porter Ranch but not our underserved community.
			edna monroy	My name is Edna Monroy, and I'm with SAJE, and I live in SD2. I would like to speak in support of Item #15 I want to thank Supervisor Hilda Solis for authoring this motion. I request the Board to support this motion that will create an opportunity for community to provide thoughtful solutions and respond to potential ideas as to what a fair solution to this ongoing issue of pets and housing. Too many pet owners for too many years have had to choose between putting a roof over their heads they can afford or keeping their pet. Pet ownership surrender has added to volume of animal lives lost and has added to the crisis in County animal shelters. For many folks Pets are Family and pet ownership has grown exponentially over the past few years due to the pandemic. There were pandemic era protections for folks but that does not help everyone. This motion is a step in the right direction to formally explore solutions, and I value the County's, namely Supervisor Solis', bravery in wanting to address this matter. Please keep LA County tenants and pets housed and protected.
			Elizabeth Jeffords	Declare a State of Emergency for Castaic/Hasley Hills Residents affected by the Chiquita Canyon Landfill toxic off-gassing. We are in peril. I have had to relocate myself and separate from my immediate family in hopes of undoing the physical and cognitive damage I have suffered from the toxic fumes and gasses. We are in need of immediate aid! Physical, financial and mental aid is critical. Our Basic human right to breathe quality air has been ripped away for over 2 years. Please do not wait another week to act! Demand the state of emergency for our community today. We are just as worthy as the affluent communities within La County and deserve immediate mortgage and relocation relief at bare minimum.



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			The following individuals submitted comments on agenda item:	
Public Comment		Oppose	Robert A Escareno	<p>Statement in Opposition to Los Angeles County Board of Supervisors Emergency Motion 71-A</p> <p>I write to express my strong opposition to Emergency Motion 71-A, which proposes to continue housing youth at Los Padrinos Juvenile Hall. This decision is a clear act of deliberate indifference to the well-being and safety of the youth confined in this facility.</p> <p>Los Padrinos Juvenile Hall has long been plagued by harmful conditions that jeopardize the physical and emotional safety of its residents. Despite repeated calls for reform and accountability, the persistent issues within this facility demonstrate a failure to provide the care, security, and rehabilitative environment required for our most vulnerable youth. By voting to keep Los Padrinos operational, the Board of Supervisors, specifically Supervisor Hilda Solis, disregards the overwhelming evidence of harm and danger posed by the conditions at this facility.</p> <p>Continuing to confine youth at Los Padrinos undermines the county's duty to act in their best interests. It reflects a lack of commitment to justice and a troubling willingness to perpetuate the cycle of harm inflicted on those who deserve support and rehabilitation, not neglect and endangerment.</p> <p>For these reasons, I urge the Board to oppose 71-A and take immediate steps toward closing Los Padrinos Juvenile Hall, prioritizing investments in community-based alternatives that truly uphold the safety, dignity, and potential of our youth.</p>
			Roshell H Amezcua	
			Zena Briggs	I am requesting that Supervisor Mitchell vote no on the following motion, ie agenda item 71-A and instead order the county to come up with a plan to safely depopulate Los Padrinos Juvenile Hall, until there is a permanent plan to have consistent, adequate staffing in place. If you simply relocate them the new facility will be overcrowded and thereby create the same problem that you are attempting to solve. It will be best to provide the safe environment that our young people deserve.



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			The following individuals submitted comments on agenda item:	
Public Comment		Other	AROGANT HOLLYWOOD	COUNTY OF LOS ANGELES PEACE OFFICERS HERNANDEZ (679557) AND HICKS (602228) HAVE BEEN TIMELY SERVED TO APPEAR AND TESTIFY AT CIVIL HARASSMENT RESTRAINING ORDER HEARING ON DECEMBER 20, 2024. LASD EAST PATROL AREA COMMANDER ALFRED M. REYES WAS EMAILED THE SITUATION AND A COPY OF THE SUBPOENAS AS WELL LASD EAST PATROL CHIEF DENNIS KNEER (dmkneer@lasd.org. IF EITHER PEACE OFFICER FAILS SHOW UP ALL EMAILED LASD, COUNTY COUNSEL ATTORNEYS, ETC. WILL BE SUED IN UNITED DISTRICT COURT FOR THE CENTRAL DISTRICT.
			AROGANT HOLLYWOOD	HAN, HORVATH, NATHAN HOCHMAN, SOLIS, AND MITCHELL. YOU KNOW THE DEAL! YOU NEED TO HURRY UP AND OVERTURN FRIVOLOUS SUPERIOR COURT CASE GA114055. YOU HAVE TAKEN AWAY A LOT OF MY FREEDOM AND LIBERTY FOR A VIOLENT AND SERIOUS FELONY I NEVER COMMITTED. ALSO, YOU NEED TO TURN OVER AND DISCLOSE A COPY OF PHONY AND BOGUS LASD-CREATED GOPRO VIDEO RECORDINGS GL010586 AND GL010587 THAT DEPICT AND DISPLAY AROGANT HOLLYWOOD SHUTTING OFF HIS GOPRO CAMERA WHILE WEARING DIFFERENT CLOTHING THAN HE ACTUALLY HAD ON FEBRUARY 21, 2023. UNITED STATES DISTRICT COURT CASE, AROGANT HOLLYWOOD v. jeffrey macomber, et al, 2:24-cv-03351 IS ATTACHED HERETO.
			Dan Talamantes	Deny Ecobat's permit
			Daniel Talamantes	See attached a resolution adopted by the Basset Unified School District asking DTSC to deny Ecobat's permit
			Deaan M Beattie	Please fight back against the State over reach into our quality of life. Address the needs of the people that want to stay but can leave. Support infrastructure that is needed now since the cow is already out of the barn. The county cannot push out the highest paying taxpayers by destroying their quality of life. Let the community member partner with to solve the social, economic, and housing issues. Build micro water storage in every neighborhood to irrigate public parks and medians. Enforce the 1954 overnight steet parking where ever possible.
			Eva Grenier	To Supervisor Horvath and the rest of the Board, My name is Eva Grenier and I am a former youth defense and dual-status attorney. I advocated for young people incarcerated in LA County's juvenile halls for almost 5 years. I am a resident of Mar Vista and I currently work with LGBTQ+ college students, as well as adults across the county suffering from mental health needs and housing instability. I am urging you to vote NO on 71-A. Proclaiming a Local Emergency Resulting from the Suitability Issues at Los Padrinos Juvenile Hall and instead, order the county to come up with a plan to safely depopulate Los



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			<p>Padrinos Juvenile Hall as soon as possible. Probation's lack of compliance with the MINIMUM standards of confinement under Title 15 is a chronic problem and not a new issue. Since 2021, all of Los Angeles County Juvenile Halls—Central, Barry J. Nidorf, and Los Padrinos Juvenile Hall ("LP")—have been in and out of compliance with the legally required minimum care necessary for youth confined in this county. In August 2024, the BSCC issued a notice of noncompliance indicating that LP was in violation of Section 1321 of Title 15 of the California Code of Regulations, which requires adequate staffing to supervise, protect, and provide services for young people under the Probation Department's "care". Understaffing at LP has led to unsafe conditions, including children enduring violence, racial divisions, visible injuries (such as facial bruising and broken bones), missed school or medical appointments, reduced or non-existent recreational or outdoor time, limited programming, inadequate safety checks, and inconsistent supervision. On October 11, 2024, the Probation Department submitted a Corrective Action Plan (CAP) to the BSCC to address its noncompliance, but the plan was inadequate, and the BSCC found Los Padrinos unsuitable for the confinement of youth. The Probation Department had until December 12, 2024, to resolve the issues of noncompliance; however, the limited action that the department took still did not meet minimum standards, and on December 12, 2024, the operation of the Los Padrinos Juvenile Hall became unlawful. It was entirely predictable that these long-term problems would once again result in closure of the facility.</p> <p>This motion and its attempt at circumventing the responsibility and accountability of this Board in overseeing Probation's operations and compliance with the law is appalling. It is your duty to keep young people in LA County safe and it was your duty a long time ago to address inadequate and dangerous conditions in LP, particularly as tied to the chronic understaffing and lack of safety. These are conditions that our most vulnerable young people, including victims of trauma, foster youth, youth with disabilities, LGBTQIA+ youth, and BIPOC youth, are enduring every day. Your proposed state of emergency to keep LP open and prevent youth housed there from being released is a fear-mongering strategy, rooted in racist narratives, and a far cry from a solution. The county needs a holistic and comprehensive long-term analysis of youth "care" under the justice system's supervision that includes adequate funding and support for community, family, and evidence-based solutions. Keeping youth detained in an unlawful facility deeply erodes community trust, the well-being of children, and any hope in efforts at reform by this Board.</p> <p>Vote NO on Item 71-A, order the County to comply with the BSCC immediately, and develop/implement a plan to depopulate LP as soon as possible.</p>
	First Last		<p>slumlord has abandoned the apartment building;</p> <p>1. criminal tenant. criminal tenant has removed their license plate. criminal tenant drives a 4dr sedan - grey color - in the parking garage. criminal has</p>

			<p>illegally modified their car so their car is very loud and wakes tenants up from sleeping on a DAILY BASIS for MONTHS. The law is California Vehicle Code - 27150-27159</p> <p>2. animal abuse/animal cruelty (alley side of the building) non-stop barking for hours, daily, for months</p> <p>3. graffiti on all sides of the building (its been there for MONTHS)</p> <p>4. door is blocked by trash so we can't use it (alley side of the building) (its been there for MONTHS)</p> <p>5. dog shit everywhere (inside and outside). (daily issue for MONTHS)</p> <p>6. slum apartment address is; 689 south berendo, los angeles, ca 90005</p> <p>7. slumlord is; fairgrovepm.com/</p>
		Item Total	13
Grand Total			13

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6. slum apartment address is;
689 south berendo, los angeles, ca 90005

7. slumlord is;
<https://fairgrovepm.com/>

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

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1 message evidence that was created on February 21, 2023.

2
3 3. This is an original 42 U.S.C. § 1983 constitutional civil rights complaint that seeks to
4 establish the reckless, wanton, willful, deliberate, malicious, and callous actions of Defendants
5 Jeffrey D. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher
6 Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres
7 Bonta, Peter Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Brian McGee, Ashley Albiento,
8 Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascon, Cheryl Lynn Kaylor,
9 Yingchun Chen, & DOES 1-10 recklessly violated Plaintiff Arogant Hollywood's United States
10 constitutional civil rights. Plaintiff Arogant Hollywood's original civil rights complaint seeks to
11 effect change through punitive damages by punishing Defendants Jeffrey D. Macomber, Jason
12 D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield,
13 Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Peter Halloran, Dennis
14 L. Beck Jr., Leah Tamu Wilson, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers,
15 Leo Ka Fong Lo, George Gascon, Cheryl Lynn Kaylor, Yingchun Chen, & DOES 1-10 for their
16 egregious conduct with the hope that the punishment is significant enough to prevent
17 Defendants from violating federal and state laws in the future that were so extreme that it
18 resulted in a Plaintiff Arogant Hollywood being falsely arrested, maliciously prosecuted for
19 nearly two years without any probable cause, being sent to prison based on fabricated and local
20 state government created evidence, and being wrongfully incarcerated for twenty of the past
21 twenty-five months (February 21, 2023 until October 17, 2023, December 12, 2023 until April
22 17, 2024, July 11, 2024 until August 30, 2024, September 5, 2024 until September 7, 2024, &
23 September 12, 2024 until September 18, 2024) that was wholly aided and abetted by reckless
24 under color of law fraud, deceit, wrongfully incarceration, and under color of law malicious
25 prosecution without probable cause. The reckless under color of law fraud and the reckless
26 under color of law deceit actions and illegal acts done by Defendants Cheryl Lynn

27
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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 Yingchun 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 "*people of the state of california v*
26 "*Arogant Hollywood*" matter was not comprised of mistakes on the periphery. It was not the

27
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1 consequence of episodic errors of judgment. Instead, it was systematic, pervasive, and
2 purposeful, with each illegal act aimed at affecting the administration of justice through the use
3 of a thoroughly reckless, willful, malicious, careless, wanton, callous and corrupt felony
4 criminal investigation designed to frame KING AROGANT through the use of peace officer
5 wholly fabricated testimony, disposal of KING AROGANT'S Samsung Galaxy S21 smart
6 mobile phone, the presentation of false and misleading LASD-created GoPro video recordings,
7 lying judicial officers, a phony and forged Superior Court of California, County of Los Angeles
8 search warrant, a phony and forged Superior Court of California, County of Los Angeles
9 probable cause determination (declaration), altered police 911 audio recordings, and the list goes
10 on and on. As the Defendants' reckless misconduct marched towards its payoff, both County of
11 Los Angeles Sheriff's Department peace officers and investigators and County of Los Angeles
12 criminal 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, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo,
23 George Gascon, Cheryl Lynn Kaylor, Yingchun 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

27
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1 **Pelican Bay State Prison, # 5 San Quentin Prison, & # 4 Folsom State Prison, respectfully**
2 **ranked in the top ten of United States' most dangerous and violent prisons).** After KING
3 AROGANT sent 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
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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 Yingchun Chen
3 was personally served a cease-and-desist letter on July 10, 2024, 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, Brian McGee, 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
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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, Yingchun Chen and Santa Clara County
10 Defendant Brian McGee who all in turned conspired with State of California employed
11 Defendants residing and working in Sacramento County to willfully, knowingly, recklessly,
12 maliciously, wantonly, and callously deprive Arogant Hollywood of his constitutional civil
13 rights while they were all recklessly bathed, clothed, draped, and covered in and under the color
14 of law.

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

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

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

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

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1 Defendants George Gascon, Cheryl Lynn Kaylor, Leo Ka Fong Lo, and Yingchun Chen
2 are all residents of the state of California.

3
4 15. Personal jurisdiction is proper against all Defendants because they are either domiciled in
5 California or have regularly transacted business in the state or are gainfully employed in
6 California.

7
8 16. This is an original constitutional civil rights action for general damages, compensatory
9 damages, punitive damages, special damages, injunctive relief, and declaratory relief under 42
10 U.S.C. § 1983 based upon under color of law willful, knowing, reckless, wanton, malicious,
11 careless, and callous violations of the Search and Seizure Clause of the Fourth Amendment of
12 the United States Constitution, and the Dure Process Clause of the Fourteenth Amendment of
13 the United States Constitution.

14
15 17. This is an original constitutional civil rights action for general damages, compensatory
16 damages, punitive damages, special damages, injunctive relief, and declaratory relief under 42
17 U.S.C. §§ 1985 & 1986 based upon under color of law willful, knowing, reckless, wanton,
18 malicious, careless, and callous violations of the Search and Seizure Clause of the Fourth
19 Amendment of the United States Constitution, and the Dure Process Clause of the Fourteenth
20 Amendment of the United States Constitution.

21
22
23 **VII. JURY TRIAL DEMAND AND CIVIL RIGHTS COMPLAINT OF AROGANT
24 HOLLYWOOD**

25 18. **PLAINTIFF AROGANT HOLLYWOOD** individually brings this original
26 constitutional civil rights action against Defendants Jeffrey D. Macomber. Jason D. Johnson,

27
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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
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1 Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer
2 Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Peter Halloran, Dennis L. Beck
3 Jr., Leah Tamu Wilson, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka
4 Fong Lo, George Gascon, Cheryl Lynn Kaylor, Yingchun Chen, & DOES 1-10. Plaintiff KING
5 AROGANT HEREBY ALLEGES AS SET FORTH BELOW:
6
7

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

10
11 19. To establish standings to maintain an action in federal district court, a plaintiff must
12 allege: (1) injury in fact, (2) causation----“a fairly traceable connection between the plaintiff’s
13 harm and the complained of conduct of the defendant”, and------(3) redressability -----
14 “a likelihood that the requested relief will redress the alleged injury.” See *Steel Co. v. Citizens*
15 *for a Better Environment*, 523 U.S. 83, 118 S.Ct. 1003, 140 L.Ed.2d 210 (1998); *Lujan v.*
16 *Defenders of Wildlife*, 504 U.S. 555, 112 S.Ct. 2130, 119 L.Ed.2d 351 (1992)
17

18 20. The Supreme Court has explained that “the irreducible constitutional minimum’ of
19 standing consists of three elements.” See *Spokeo Inc. v. Robins*, 578 U.S. 330, 136 S.Ct. 1540,
20 194 L.Ed.2d 635 (2016) (*quoting Lujan*, 504 U.S. at 560). A plaintiff “must have (1) suffered an
21 injury in fact, (2) that is fairly traceable to the challenged conduct of a defendant, and (3) that is
22 likely to be redressed by a favorable judicial decision.
23

24 21. Plaintiff Arogant Hollywood has alleged that Defendants willfully, knowingly,
25 recklessly, wantonly, carelessly, maliciously, and callously violated his constitutional civil
26 rights under color law. Plaintiff Arogant Hollywood has alleged that all Defendants’ willful,
27

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

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

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

24
25 24. Plaintiff hereby alleges that Defendants violated KING AROGANT's constitutional 4th &
26 14th Amendment rights by willfully, knowingly, wantonly, recklessly, maliciously, and

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1 callously committing under color of law fraud, under color of law fraud upon the court, and
2 under color of law deceit, and Plaintiff KING AROGANT has alleged numerous other federal
3 and state violations including but not limited to 42 U.S.C. §§ 1983, 1985, & 1986.
4

5 **IX. PARTIES**

6
7 25. Plaintiff **AROGANT HOLLYWOOD** (hereinafter “**KING AROGANT**” or
8 “**Plaintiff**”) is currently a homeless and transient resident of California and Los Angeles
9 County. At the time of the filing of this original constitutional civil rights complaint, Plaintiff
10 KING AROGANT was homeless in or around the cities of San Marino, Pasadena, South
11 Pasadena, and Arcadia. At all relevant times stated throughout this original federal civil rights
12 complaint, Plaintiff KING AROGANT was a part owner of real property located at 13732
13 Runnymede Street, Van Nuys, CA 91405, and only became homeless after being forced to leave
14 based on the under the color of law fraud and under color of law deceit done to him willfully,
15 knowingly, wantonly, recklessly, maliciously, and callously by Defendant Cheryl Lynn Kaylor.
16 At all relevant times stated throughout this original federal civil rights complaint, Plaintiff KING
17 AROGANT was an established residential tenant of real property located at 541 Bruin Drive,
18 Riverside, CA 92507, and only became homeless after being forced to leave based on the under
19 color of law fraud, and under color law deceit done to him willfully, knowingly, wantonly,
20 recklessly, maliciously, and callously by Defendant Yingchun Chen.
21

22 26. At all times relevant hereto and stated throughout this original constitutional civil rights
23 complaint, Plaintiff **KING HOLLYWOOD** was an individual over 18 years old, a resident of
24 the state of California, and a citizen of the United States of America.
25

26 27. Plaintiff **KING AROGANT** is a part owner of real property located at 13732
27

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1 Runnymede Street, Van Nuys, CA 91405 that was in peaceful possession of said real property
2 until Defendant Cheryl Lynn Kaylor's willful, knowing, reckless, careless, wanton, malicious,
3 and callus under color of fraud and under color of law deceit resulted in **KING AROGANT**
4 being forced to leave a home that he was peacefully in possession of prior to April 17, 2024.
5 Defendant Cheryl Lynn Kaylor used the assistance of CDCR peace officers to remove KING
6 AROGANT from his home recklessly.

7
8 28. Plaintiff **KING AROGANT** was an established residential tenant of real property located
9 at 541 Bruin Drive, Riverside, CA 92507, and he was in peaceful possession of said real
10 property until Defendant Yingchun Chen's willful, knowing, reckless, careless, wanton,
11 malicious, and callus under color of fraud and under color of law deceit resulted in **KING**
12 **AROGANT** being forced to leave a home that he was peacefully in possession of prior to April
13 17, 2024. Defendant Yingchun Chen used the assistance of CDCR peace officers to remove
14 KING AROGANT from his home recklessly.

15
16 29. Plaintiff **KING AROGANT** has an interest in this original constitutional civil rights
17 action through his residential tenancy of Defendant Yingchun Chen's property owned at 541
18 Bruin Drive, Riverside, CA 92507, his ownership of real property located at 13732 Runnymede
19 Street, Van Nuys, CA 91405, and through and by the reckless illegal acts and actions done to
20 KING AROGANT by all Defendants that was in direct violation of 42 U.S.C. § 1983, 42 U.S.C.
21 § 1985, 42 U.S.C. § 1986, U.S.C.A. CONST. AMEND IV & XIV.

22
23 30. Plaintiff **KING AROGANT** is a proper and appropriate party to this original
24 constitutional civil rights action through his residential tenancy at 541 Bruin Drive, Riverside,
25 CA 92507, through his real property ownership of a house located at 13732 Runnymede Street,
26 Van Nuys, CA 91405, and by and through all Defendants' reckless, wanton, malicious, callous,

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1 willful, and deliberate actions alleged herein and throughout this civil rights complaint that
2 interfered, invaded, infringed upon, and deprived **KING AROGANT** of his United States
3 constitutional civil rights pursuant to 42 U.S.C. § 1983, 42 U.S.C. § 1985, 42 U.S.C. § 1986, the
4 Search and Seizure Clause of the Fourth Amendment of the United States Constitution, the Due
5 Process Clause of the Fourteenth Amendment of the United States Constitution, and the
6 analogous provisions of California constitutional and statutory law. Plaintiff **KING AROGANT**
7 seeks compensatory damages, general damages, special damages, and punitive damages for the
8 individual Plaintiff **KING AROGANT** on his behalf and for himself only.

9
10 31. Defendant **JEFFREY A. MACOMBER** (hereinafter “**Macomber**”) is the governor-
11 appointed Secretary of the California Department of Corrections and Rehabilitation (hereinafter
12 “**CDCR**”) and all its many entities and subsidiaries. Defendant Jeffrey A. Macomber engaged in
13 the reckless and wanton conduct complained upon herein while working in the course and scope
14 of his employment with the California Department of Corrections and Rehabilitation. Defendant
15 Macomber is at this moment sued in his official capacity as the governor-appointed Secretary
16 and in his personal capacity as a citizen of the United States. Defendant Macomber acted under
17 the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with
18 callous indifference to **KING AROGANT**'s federally protected civil rights. Defendant
19 Macomber intentionally and recklessly violated **KING AROGANT**'s Fourteenth Amendment
20 Due Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure
21 Clause constitutional civil rights, and his California Constitution Article I, § 7 and California
22 Constitution Article I, § 26 civil rights. Defendant Macomber resides in Sacramento County.
23 Defendant Macomber is not entitled to any type, shape, or form of immunity.

24
25 32. Defendant **JASON D. JOHNSON** (hereinafter “**Johnson**” OR “**Uncle Tom**”) is the
26 governor-appointed Director of the California Department of Corrections and Rehabilitation's

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1 Division of Adult Parole Operations (**hereinafter after “DAPO”**) and all its many entities and
2 subsidiaries. Defendant Uncle Tom engaged in the reckless and wanton conduct complained
3 upon herein while working in the course and scope of his employment with the California
4 Department of Corrections and Rehabilitation. Defendant Uncle Tom is at this moment sued in
5 his official capacity as the governor-appointed Director of the California Department of
6 Corrections and Rehabilitation’s Division of Adult Parole Operations and in his personal
7 capacity as a citizen of the United States. Defendant Johnson 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 Uncle Tom 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 Uncle Tom resides in Sacramento County. Defendant Johnson is not
14 entitled to any type, shape or form of immunity.

15
16 33. Defendant **JENNIFER L. BARRETTO** (**hereinafter “Barretto”**) is the governor-
17 appointed Undersecretary of Administration of the California Department of Corrections and
18 Rehabilitation and all its many entities and subsidiaries. Defendant Barretto engaged in the
19 reckless and wanton conduct complained upon herein while working in the course and scope of
20 her employment with the California Department of Corrections and Rehabilitation. Defendant
21 Barretto is at this moment sued in her official capacity as the governor-appointed
22 Undersecretary of Administration of the California Department of Corrections and
23 Rehabilitation and in her personal capacity as a citizen of the United States. Defendant Barretto
24 acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and
25 deliberately with callous indifference to KING AROGANT's federally protected civil rights.
26 Defendant Barretto intentionally and recklessly violated KING AROGANT’s Fourteenth

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1 Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and
2 Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and
3 California Constitution Article I, § 26 civil rights. Defendant Barretto resides in Sacramento
4 County. Defendant Barretto is not entitled to any type, shape or form of immunity.

5
6 34. Defendant **TAMMATHA FOSS (hereinafter “Foss”)** is the governor-appointed
7 Undersecretary of Operations of the California Department of Corrections and Rehabilitation
8 and all its many entities and subsidiaries. Defendant Foss engaged in the reckless and wanton
9 conduct complained upon herein while working in the course and scope of her employment with
10 the California Department of Corrections and Rehabilitation. Defendant Foss is at this moment
11 sued in her official capacity as the governor-appointed Undersecretary of Operations of the
12 California Department of Corrections and Rehabilitation and in her personal capacity as a
13 citizen of the United States. Defendant Foss acted under the color of law willfully, recklessly,
14 maliciously, callously, carelessly, and deliberately with callous indifference to KING
15 AROGANT's federally protected civil rights. Defendant Foss intentionally and recklessly
16 violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil
17 rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his
18 California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights.
19 Defendant Foss resides in Sacramento County. Defendant Foss is not entitled to any type, shape,
20 or form of immunity.

21
22 35. Defendant **CHRISTOPHER CHAMBERS (hereinafter “Chambers”)** is the governor-
23 appointed Director of Correctional Policy Research and Internal Oversight of the California
24 Department of Corrections and Rehabilitation and all its many entities and subsidiaries.
25 Defendant Chambers engaged in the reckless and wanton conduct complained upon herein while
26 working in the course and scope of his employment with the California Department of

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1 Corrections and Rehabilitation. Defendant Chambers is at this moment sued in his official
2
3
4 capacity as the governor-appointed Director of Correctional Policy Research and Internal
5 Oversight of the California Department of Corrections and Rehabilitation and in his personal
6 capacity as a citizen of the United States. Defendant Chambers acted under the color of law
7 willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference
8 to KING AROGANT's federally protected civil rights. Defendant Chambers intentionally and
9 recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause
10 constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil
11 rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26
12 civil rights. Defendant Chambers resides in Sacramento County. Defendant Chambers is not
13 entitled to any type, shape, or form of immunity.

14
15 36. Defendant **RONALD BROOMFIELD (hereinafter "Broomfield")** is the governor-
16 appointed Director of Adult Institutions of the California Department of Corrections and
17 Rehabilitation and all its many entities and subsidiaries. Defendant Broomfield engaged in the
18 reckless and wanton conduct complained upon herein while working in the course and scope of
19 his employment with the California Department of Corrections and Rehabilitation. Defendant
20 Broomfield is at this moment sued in his official capacity as the governor-appointed Director of
21 Adult Institutions of the California Department of Corrections and Rehabilitation and in his
22 personal capacity as a citizen of the United States. Defendant Broomfield acted under the color
23 of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous
24 indifference to KING AROGANT's federally protected civil rights. Defendant Broomfield
25 intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process
26 Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause

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1 constitutional civil rights, and his California Constitution Article I, § 7 and California
2 Constitution Article I, § 26 civil rights. Defendant Broomfield resides in Sacramento County.
3 Defendant Broomfield is not entitled to any type, shape, or form of immunity.

4
5 37. Defendant **JENNIFER BENAVIDEZ (hereinafter “Benevidez”)** is the governor-
6 appointed Deputy Director of Facility Operation of the California Department of Corrections
7 and Rehabilitation’s Division of Adult Institutions and all its many entities and subsidiaries.
8 Defendant Benevidez engaged in the reckless and wanton conduct complained upon herein
9 while working in the course and scope of her employment with the California Department of
10 Corrections and Rehabilitation. Defendant Benevidez is at this moment sued in her official
11 capacity as the governor-appointed Deputy Director of Facility Operation of the California
12 Department of Corrections and Rehabilitation’s Division of Adult Institutions and in her
13 personal capacity as a citizen of the United States. Defendant Benevidez acted under the color of
14 law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous
15 indifference to KING AROGANT's federally protected civil rights. Defendant Benevidez
16 intentionally and recklessly violated KING AROGANT’s Fourteenth Amendment Due Process
17 Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause
18 constitutional civil rights, and his California Constitution Article I, § 7 and California
19 Constitution Article I, § 26 civil rights. Defendant Benevidez resides in Sacramento County.
20 Defendant Benavidez is not entitled to any type, shape or form of immunity.

21
22 38. Defendant **GAVIN CHRISTOPHER NEWSOM (hereinafter “Newsom”)** is an
23 American politician, and businessman serving since 2019 as the 40th governor of the state of
24 California all its many entities, agencies, and subsidiaries (CDCR, DAPO, State Bar of
25 California, California Department of Justice, and California Office of Attorney General.
26 Defendant Newsom engaged in the reckless and wanton conduct complained upon herein while

27 working in the course and scope of his employment with the state of California and as the 40th
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1 governor of California. Defendant Newsom is at this moment sued in his official capacity as the
2 governor of the state of California and all its many entities, agencies, and subsidiaries (CDCR,
3 DAPO, State Bar of California, California Department of Justice, and California Office of
4 Attorney General. and in his personal capacity as a citizen of the United States. Defendant
5 Newsom acted under the color of law willfully, recklessly, maliciously, callously, carelessly,
6 and deliberately with callous indifference to KING AROGANT's federally protected civil rights.
7 Defendant Newsom intentionally and recklessly violated KING AROGANT's Fourteenth
8 Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and
9 Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and
10 California Constitution Article I, § 26 civil rights. Defendant Newsom resides in Sacramento
11 County. Defendant Newsom is not entitled to any type, shape or form of immunity.

12
13 39. Defendant **ROBERT ANDRES BONTA (hereinafter "Bonta") (SBN # 202668)** is an
14 American lawyer and, politician serving since 2021 as the attorney general of the state of
15 California and as the chief attorney overseeing the California Department of Justice and all its
16 many entities, agencies, and subsidiaries (California Department of Justice, and California
17 Office of Attorney General). Defendant Bonta engaged in the reckless and wanton conduct
18 complained upon herein while working in the course and scope of his employment with the state
19 of California and as the attorney general of California. Defendant Bonta is at this moment sued
20 in his official capacity as as the attorney general of the state of California and as the chief
21 attorney overseeing the California Department of Justice and all its many entities, agencies, and
22 subsidiaries (California Department of Justice and California Office of Attorney General), and
23 in his personal capacity as a citizen of the United States. Defendant Bonta acted under the color
24 of law willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous
25 indifference to KING AROGANT's federally protected civil rights. Defendant Bonta
26 intentionally and recklessly violated KING AROGANT's Fourteenth Amendment Due Process

27
28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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.
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1 Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause
2 constitutional civil rights, and his California Constitution Article I, § 7 and California
3 Constitution Article I, § 26 civil rights. Defendant Bonta resides in Sacramento County.
4 Defendant Bonta is not entitled to any type, shape, or form of immunity.
5

6 40. Defendant **PETER DWIGHT HALLORAN (hereinafter “Halloran”)** (SBN # 184025)
7 is a Supervising Deputy Attorney General working from the California Department of Justice
8 and employed by the State of California. Defendant Halloran engaged in the reckless and
9 wanton conduct complained upon herein while working in the course and scope of his
10 employment with the state of California. Defendant Halloran is at this moment sued in his
11 official capacity as a Supervising Deputy Attorney General working from the California
12 Department of Justice and employed by the State of California, and in his personal capacity as a
13 citizen of the United States. Defendant Halloran acted under the color of law willfully,
14 recklessly, maliciously, callously, carelessly, and deliberately with callous indifference to KING
15 AROGANT's federally protected civil rights. Defendant Bonta intentionally and recklessly
16 violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil
17 rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his
18 California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights.
19 Defendant Halloran resides in Sacramento County. Defendant Halloran is not entitled to any
20 type, shape, or form of immunity.
21

22 41. Defendant **DENNIS L. BECK (hereinafter “Beck”)** (SBN # 179492) is a Supervising
23 Deputy Attorney General working from the California Department of Justice and employed by
24 the State of California. Defendant Beck engaged in the reckless and wanton conduct complained
25 upon herein while working in the course and scope of his employment with the state of
26 California. Defendant Beck is at this moment sued in his official capacity as a Supervising
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 JUDICIAL ABUSE OF PROCESS, 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 Deputy Attorney General working from the California Department of Justice and employed by
2 the State of California, and in his personal capacity as a citizen of the United States. Defendant
3 Beck acted under the color of law willfully, recklessly, maliciously, callously, carelessly, and
4 deliberately with callous indifference to KING AROGANT's federally protected civil rights.
5 Defendant Bonta intentionally and recklessly violated KING AROGANT's Fourteenth
6 Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and
7 Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and
8 California Constitution Article I, § 26 civil rights. Defendant Beck resides in Sacramento
9 County. Defendant Beck is not entitled to any type, shape or form of immunity.

10
11 42. Defendant **LEAH TAMU WILSON (hereinafter "Wilson") (SBN # 222790)** is an
12 American lawyer serving since 2021 as the State Bar Board of Trustees appointed Executive
13 Director of the State Bar of California and all its many entities, agencies, and subsidiaries.
14 Defendant Wilson engaged in the reckless and wanton conduct complained upon herein while
15 working in the course and scope of his employment with the state of California and as the State
16 Bar Board of Trustees appointed Executive Director of the State Bar of California and all its
17 many entities, agencies, and subsidiaries. . Defendant Wilson is at this moment sued in her
18 official capacity as the State Bar Board of Trustees appointed Executive Director of the State
19 Bar of California and all its many entities, agencies, and subsidiaries and in her personal
20 capacity as a citizen of the United States. Defendant Wilson acted under the color of law
21 willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference
22 to KING AROGANT's federally protected civil rights. Defendant Bonta intentionally and
23 recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause
24 constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil
25 rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26
26 civil rights. Defendant Wilson resides in Sacramento County. Defendant Wilson is not entitled

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28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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.
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1 to any type, shape, or form of immunity.

2
3 43. Defendant **BRIAN MCGEE (hereinafter “McGee”)**. Defendant McGee is a
4 fifty-something-year-old educated Caucasian businessman that is currently employed by the
5 publicly traded San Mateo, California-based GoPro Inc. (NASDAQ: GPRO) as its Executive
6 Vice President, Chief Operating Officer, and Chief Financial Officer. Defendant McGee
7 engaged in the reckless and wanton conduct complained upon herein while working in the
8 course and scope of his employment with the publicly traded San Mateo, California-based
9 GoPro Inc. (NASDAQ: GPRO) and all its many entities, agencies, and subsidiaries. Defendant
10 McGee is at this moment sued in his official capacity as an executive at publicly traded San
11 Mateo, California-based GoPro Inc. (NASDAQ: GPRO) and in his personal capacity as a citizen
12 of the United States. Defendant McGee acted under the color of law willfully, recklessly,
13 maliciously, callously, carelessly, and deliberately with callous indifference to KING
14 AROGANT's federally protected civil rights. Defendant McGee intentionally and recklessly
15 violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil
16 rights, his Fourth Amendment Search and Seizure Clause constitutional civil rights, and his
17 California Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights.
18 Defendant McGee resides in Santa Clara County.

19
20 44. Defendant **ASHLEY ALBIENTO (hereinafter “Albiento”)**. Defendant Albiento is a
21 forty-something-year-old Senior Manager of Business Operations & Strategy employed at the
22 publicly traded San Mateo, California-based GoPro Inc. (NASDAQ: GPRO). Defendant
23 Albiento engaged in the reckless and wanton conduct complained upon herein while working in
24 the course and scope of his employment with the publicly traded San Mateo, California-based
25 GoPro Inc. (NASDAQ: GPRO) and all its many entities, agencies, and subsidiaries. Defendant
26 Albiento is at this moment sued in his official capacity as a Senior Manager of Business

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 JUDICIAL ABUSE OF PROCESS, 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 Operations & Strategy employed at the publicly traded San Mateo, California-based GoPro Inc.
2 (NASDAQ: GPRO), and in her personal capacity as a citizen of the United States. Defendant
3 Albiento acted under the color of law willfully, recklessly, maliciously, callously, carelessly,
4 and deliberately with callous indifference to KING AROGANT's federally protected civil rights.
5 Defendant Albiento intentionally and recklessly violated KING AROGANT's Fourteenth
6 Amendment Due Process Clause constitutional civil rights, his Fourth Amendment Search and
7 Seizure Clause constitutional civil rights, and his California Constitution Article I, § 7 and
8 California Constitution Article I, § 26 civil rights. Defendant Albiento resides in Sacramento
9 County.

10
11 45. Defendant **BRYCE MILLER** (hereinafter "Miller"). Defendant Miller is a thirty-
12 something-year-old Professional Account Manager employed by the publicly traded Scottsdale,
13 Arizona-based Axon Enterprises, Inc. (NASDAQ: AXON). Defendant Miller engaged in the
14 reckless and wanton conduct complained upon herein while working in the course and scope of
15 his employment with the publicly traded Scottsdale, Arizona-based Axon Enterprises, Inc.
16 (NASDAQ: AXON) and all its many entities, agencies, and subsidiaries. Defendant Miller is at
17 this moment sued in his official capacity as a Professional Account Manager employed by the
18 publicly traded Scottsdale, Arizona-based Axon Enterprises, Inc. (NASDAQ: AXON) and in his
19 personal capacity as a citizen of the United States. Defendant Miller acted under the color of law
20 willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference
21 to KING AROGANT's federally protected civil rights. Defendant Miller intentionally and
22 recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause
23 constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil
24 rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26
25 civil rights. Defendant Miller resides in Sacramento County.

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 JUDICIAL ABUSE OF PROCESS, 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 46. Defendant **ELIZABETH BYERS** (hereinafter “**Byers**”). Defendant Byers is a forty-
2 something-year-old Professional Pubic Safety Software Account Executive employed by the
3 publicly traded Scottsdale, Arizona-based Axon Enterprises, Inc. (NASDAQ: AXON).
4 Defendant Byers engaged in the reckless and wanton conduct complained upon herein while
5 working in the course and scope of her employment with the publicly traded Scottsdale,
6 Arizona-based Axon Enterprises, Inc. (NASDAQ: AXON) and all its many entities, agencies,
7 and subsidiaries. Defendant Byers is at this moment sued in her official capacity as a
8 Professional Pubic Safety Software Account Executive employed by the publicly traded
9 Scottsdale, Arizona-based Axon Enterprises, Inc. (NASDAQ: AXON), and in her personal
10 capacity as a citizen of the United States. Defendant Byers acted under the color of law
11 willfully, recklessly, maliciously, callously, carelessly, and deliberately with callous indifference
12 to KING AROGANT's federally protected civil rights. Defendant Miller intentionally and
13 recklessly violated KING AROGANT's Fourteenth Amendment Due Process Clause
14 constitutional civil rights, his Fourth Amendment Search and Seizure Clause constitutional civil
15 rights, and his California Constitution Article I, § 7 and California Constitution Article I, § 26
16 civil rights. Defendant Byers resides in Sacramento County.

17
18 47. Defendant **LEO KA FONG LO** (hereinafter “**GoPro Manipulator**”) is an Asian-
19 American peace officer working from the California Department of Justice regulated and
20 the State of California funded County of Los Angeles Sheriff's Department's Fraud and Cyber
21 Crimes Bureau's Southern California High Tech Task Force and employed by the County of
22 Los Angeles as a sworn-in California state public safety officer/peace officer. Defendant GoPro
23 Manipulator engaged in the reckless and wanton conduct complained upon herein while working
24 in the course and scope of his employment with the County of Los Angeles. Defendant GoPro
25 Manipulator is at this moment sued in his official capacity as a peace officer working from the
26 California Department of Justice regulated and the State of California funded County of Los

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 JUDICIAL ABUSE OF PROCESS, 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 Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's Southern California High
2 Tech Task Force and employed by the County of Los Angeles as a sworn-in California state
3 public safety officer/peace officer and in his personal capacity as a citizen of the United States.
4 Defendant GoPro Manipulator acted under the color of law willfully, recklessly, maliciously,
5 callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally
6 protected civil rights. Defendant GoPro Manipulator intentionally and recklessly violated KING
7 AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth
8 Amendment Search and Seizure Clause constitutional civil rights, and his California
9 Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant
10 GoPro Manipulator resides in Los Angeles County. Defendant GoPro Manipulator is not entitled
11 to any type, shape, or form of immunity.

12
13 48. Defendant **GEORGE GASCÓN (hereinafter "Gascón") (SBN # 182345)** is an
14 American attorney and former police officer serving since December 7, 2020, as the 43rd district
15 attorney of the County of Los Angeles District Attorney's Office and all its many entities,
16 agencies, and subsidiaries (Alhambra Field Office, Cyber Crime Division, & Family Violence
17 Division). Defendant Gascón engaged in the reckless and wanton conduct complained upon
18 herein while working in the course and scope of his employment with the County of Los
19 Angeles and as its 43rd district attorney. Defendant Gascón is at this moment sued in his official
20 capacity as the 43rd district attorney of the County of Los Angeles District Attorney's Office and
21 all its many entities, agencies, and subsidiaries (Alhambra Field Office, Cyber Crime Division,
22 & Family Violence Division). and in his personal capacity as a citizen of the United States.
23 Defendant Gascón acted under the color of law willfully, recklessly, maliciously, callously,
24 carelessly, and deliberately with callous indifference to KING AROGANT's federally protected
25 civil rights. Defendant Gascón intentionally and recklessly violated KING AROGANT's
26 Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth Amendment

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DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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1 Search and Seizure Clause constitutional civil rights, and his California Constitution Article I, §
2 7 and California Constitution Article I, § 26 civil rights. Defendant Gascón resides in Los
3 Angeles County.

4
5 49. Defendant **CHERYL LYNN KAYLOR (hereinafter “Kaylor”)**. Defendant Kaylor is a
6 seventy-eight-year-old severely disabled and elderly Caucasian woman. Defendant Kaylor
7 engaged in the reckless and wanton conduct complained upon herein by conspiring with
8 numerous State of California Defendants to violate KING AROGANT’s constitutional civil
9 rights. Defendant Kaylor is, at this moment, sued in her personal capacity as a citizen of the
10 United States. Defendant Kaylor acted under the color of law willfully, recklessly, maliciously,
11 callously, carelessly, and deliberately with callous indifference to KING AROGANT's federally
12 protected civil rights. Defendant Kaylor intentionally and recklessly violated KING
13 AROGANT’s Fourteenth Amendment Due Process Clause constitutional civil rights, his Fourth
14 Amendment Search and Seizure Clause constitutional civil rights, and his California
15 Constitution Article I, § 7 and California Constitution Article I, § 26 civil rights. Defendant
16 Kaylor resides in Los Angeles County.

17
18 50. Defendant **YINGCHUN CHEN (hereinafter “Chen”)**. Defendant Chen is a fifty-
19 something-year-old Asian-American woman. Defendant Chen engaged in the reckless and
20 wanton conduct complained upon herein by conspiring with numerous State of California
21 Defendants to violate KING AROGANT’s constitutional civil rights. Defendant Chen is, at this
22 moment, sued in her personal capacity as a citizen of the United States. Defendant Chen acted
23 under the color of law willfully, recklessly, maliciously, callously, carelessly, and deliberately
24 with callous indifference to KING AROGANT's federally protected civil rights. Defendant
25 Chen intentionally and recklessly violated KING AROGANT’s Fourteenth Amendment Due
26 Process Clause constitutional civil rights, his Fourth Amendment Search and Seizure Clause

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28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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.
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1 constitutional civil rights, and his California Constitution Article I, § 7 and California
2 Constitution Article I, § 26 civil rights. Defendant Chen resides in Riverside County.

3
4 51. Plaintiff **KING AROGANT** is unaware of the true and proper names of Defendants
5 listed as DOES 1 through 10, inclusive, and therefore sues them by the fictitious preceding
6 names. The plaintiff will amend his original constitutional civil rights complaint by inserting the
7 proper names instead of said fictitious names, together with apt and proper charging words when
8 said actual names are ascertained. Plaintiff **KING AROGANT** is informed and believes and
9 thereon alleges that each of the Defendants designated herein as a DOE is responsible and liable
10 to Plaintiff in some manner for the events, happenings, and contention referred to in this original
11 constitutional civil rights complaint. All references herein to “Defendant: or “Defendants” shall
12 be deemed to include all DOE Defendants.

13
14 52. Plaintiff **KING AROGANT** is informed and believes and thereon alleges that each
15 Defendant, including DOES 1 through 10, was and is the agent, employee, servant, subsidiary,
16 partner, member, associate, co-conspirator, acquaintance, friend, ally, supporter, accessory,
17 amigo, comrade, backer, abettor, instigator sympathizer, confidant or representative of each
18 other Defendant, and that all of the things alleged to have been done in the course and scope of
19 said agency, employment, service, subsidiary, partnership, membership, association, private
20 citizen to local government relationship, or representative relationship and with the knowledge
21 and consent of their respective principals, employers, masters, parent corporations, partners,
22 members, associates, or representatives. Each Defendant has authorized, ratified,
23 acknowledged, consented, authorized, accepted, acquiesced, permitted, allowed, condoned,
24 excused, overlooked, pardoned, tolerated, and approved of all illegal acts, actions, conduct,
25 misconduct, misdeeds, transgressions, and omissions by each other Defendant. Plaintiff **KING**
26 **AROGANT** is informed and believes, and thereon alleges, that each of the fictitiously named

27
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1 Defendants is responsible in some manner for the occurrences alleged in this original civil rights
2 complaint and that Plaintiff KING AROGANT's compensatory damages,, punitive damages,
3 general damages, and special damages as alleged in this original constitutional civil rights
4 complaint, were proximately caused by those Defendants.

5
6 53. The allegations of this original constitutional civil rights complaint, based on information
7 and belief, will likely have evidentiary support after a reasonable opportunity for further
8 investigation and discovery. Such include issuing federal district court subpoenas duces tecum,
9 the taking of oral depositions, and Requests for Admission and Special Interrogatories, all of
10 which Plaintiff KING AROGANT intends to conduct after the Rule 26(f) conference.

11
12 **X. CONTINUING VIOLATIONS**

13
14 54. The wrongful acts and omissions giving rise to the Defendants' liability in this original
15 constitutional civil rights action commenced on February 21, 2023, and have been and are
16 "continuing" in nature as of the date of filing of this constitutional civil rights complaint on
17 October 30, 2024. Plaintiff KING ARIGANT, therefore, HEREBY reserves his right to amend
18 this original constitutional civil rights complaint (Into his FAC) as new and additional facts and
19 claims arise or become known to Plaintiff KING AROGANT.

20
21 **XI. FACTS**

22
23 **GENERAL ALLEGATIONS OF COMPLAINT IN SUPPORT OF PLAINTIFF**
24 **KING AROGANT'S CLAIMS FOR RELIEF, REQUESTED**
25 **RELIEF & DAMAGES**
26

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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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.
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1 **A. PHONY SEARCH WARRANT, FORGED PROBABLE CAUSE: A**
2 **HISTORY OF A CORRUPT AND SHODDY CRIMINAL CASE AND**
3 **INVESTIGATION**

4 55. On February 21, 2023, between 11 AM and 3:30 PM, KING AROGANT made numerous
5 telephone calls to the County of Los Angeles Office of Inspector General by dialing (213) 974-
6 6100, County of Los Angeles Sheriff's Department's Risk Management Bureau by dialing (323)
7 890-5400, and the County of Los Angeles District Attorney's Office-Alhambra Field Office by
8 dialing (626) 308-5302. When calling all the above-stated County of Los Angeles public
9 agencies, KING AROGANT complained and told numerous County of Los Angeles employees
10 and peace officers that he was innocent. KING AROGANT complained and told numerous
11 County of Angeles employees and peace officers that he was falsely accused and falsely
12 arrested. KING AROGANT complained and told numerous County of Angeles employees and
13 peace officers that he had audio recording evidence on his mobile phone that would prove that
14 he did not make a criminal threat to Jennifer Hutton-Heger (**hereinafter "Hutton"**).

15
16 56. KING AROGANT complained and told numerous County of Angeles employees and
17 peace officers that he had video recording evidence on his GoPro camera that would prove that
18 he never made a criminal threat to Hutton on February 21, 2023. The above-stated facts prove
19 that the County of Los Angeles employees and peace officers had secretly planned to FRAME
20 KING AROGANT for a violent and serious felony crime they knew he did not commit long
21 before the commencement of AROGANT's rigged felony preliminary hearing that commenced
22 on April 4, 2023. After the filing of this original constitutional civil rights complaint, KING
23 AROGANT will request that the United States Eastern District Court civil clerk's office issue a
24 subpoena duces tecum that would command Reston, Virginia Global Tel Link to turn over all
25 audio recorded telephone conversations and calls that KING AROGANT made while he was
26 falsely incarcerated at the County of Los Angeles Sheriff's Department's Temple City police

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1 station on February 21, 2023.

2
3 57. On February 21, 2023, between 1 PM and 4 PM, KING AROGANT yelled out over and
4 over again and even spoke to a male County of Los Angeles Sheriff's Department peace officer
5 lieutenant acting as the Temple City police station's watch commander. KING AROGANT
6 requested that this peace officer lieutenant bring KING AROGANT his mobile phone and
7 GoPro camera so he could provide law enforcement exculpatory evidence that would prove that
8 he never threatened to harm Jennifer Hutton-Heger on February 21, 2023, physically, and could
9 then be released after showing County of Los Angeles peace officers his exculpatory evidence.
10 At approximately 4 PM, apparently tired and frustrated with hearing KING AROGANT beg to
11 receive his exculpatory evidence on his mobile phone and GoPro camera. Rogue and RACIST
12 County of Los Angeles peace officer detective Sergeant Richard Lewis (acting peace officer
13 supervisor of Dirty cop Billy S. Khounthavong) snapped at KING AROGANT and told him
14 the following:

15 ***"Your phone and GoPro camera have been seized as evidence***
16 ***to be used against you."***
17

18 58. On February 21, 2023, at approximately 6 PM, rogue and dishonest County of Los
19 Angeles peace officer detective Billy S. Khounthavong (**hereinafter "Lying Billy"**) arrived at
20 KING AROGANT's County of Los Angeles Sheriff's Department (hereinafter "LASD")
21 Temple City police station detention holding cell to speak with KING AROGANT. KING
22 AROGANT then knowingly and intelligently waived his Miranda rights. When Lying Billy
23 asked KING AROGANT about what had occurred, KING AROGANT told Lying Billy that the
24 verbal argument and confrontation started over a UBER XL parking dispute outside of Hutton's
25 house. KING AROGANT further told Lying Billy that he had exculpatory video recording and
26 audio evidence on his mobile phone and GoPro camera that Jennifer Hutton Heger was lying
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 JUDICIAL ABUSE OF PROCESS, 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 and falsely accusing KING AROGANT of making a criminal threat to her on February 21,
2 2023. When KING AROGANT requested and asked Lying Billy if he could bring him his
3 mobile phone and GoPro camera, Lying Billy willfully, knowingly, recklessly, wantonly,
4 maliciously, carelessly, and callously lied to KING AROGANT by telling him that he could not
5 retrieve KING AROGANT's mobile phone and GoPro camera. When KING AROGANT asked
6 Lying Billy if he had seized his mobile phone and GoPro camera, Lying Billy willfully,
7 knowingly, recklessly, wantonly, maliciously, carelessly, and callously lied to KING
8 AROGANT by telling him that he had not seized KING AROGANT's mobile phone and GoPro
9 camera. Towards the end of KING AROGANT's police interview conducted and orchestrated
10 by Lying Billy. Lying, Billy asked KING AROGANT if there were any knives around where he
11 was standing in the kitchen, and AROGANT told Lying Billy that he did not remember seeing
12 any knives inside of Jennifer Hutton Heger's kitchen. Lying Billy's questions to KING
13 AROGANT, asking him if he had seen any knives in Hutton's kitchen, and asking KING
14 AROGANT if he had any access to knives while he was standing in Jennifer Hutton Heger's
15 kitchen on February 21, 2023, proves by clear and convincing evidence that LASD, Brian
16 MARK Rosenberg (SBN # 291501), George Gascón (SBN # 182345), and the office of George
17 Gascón willfully, knowingly, recklessly, wantonly, maliciously, carelessly, and callously made-
18 up and created their preliminary hearing case-in-chief that KING AROGANT was standing
19 inside of Jennifer Hutton Heger's kitchen and then turned around facing her while KING
20 AROGANT was brandishing a kitchen knife. This fact can be further proven true by the
21 fabricated lies and statements of both Jennifer Hutton Heger's original video recorded February
22 21, 2023 police interview and the police statements documented by County of Los Angeles
23 rogue peace officers Alex Contreras and Daniel Esqueda. In fact, Jennifer Hutton-Heger did not
24 accuse KING AROGANT of brandishing a knife in her kitchen until she had her body camera
25 recorded County of Los Angeles District Attorney's Office police interview with racist deputy
26 district attorney Brian MARK Rosenberg (SBN # 291501) and his co-conspirator Billy S.

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 JUDICIAL ABUSE OF PROCESS, 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 Khounthavong on or about March 9, 2023. This proved yet again that the County of Los
2 Angeles and Defendant George Gascón willfully, knowingly, recklessly, wantonly, maliciously,
3 carelessly, and callously conspired to violate KING AROGANT's constitutional civil rights by
4 framing him prior to the commencement of KING AROGANT's preliminary hearing
5 commencing on April 4, 2023.

6
7 59. On February 21, 2023, between 6:30 PM and 9:30 PM, rogue peace officer Billy S.
8 Khounthavong spent time illegally accessing, illegally copying, illegally downloading, and
9 illegally reviewing GoPro video recordings stored on KING AROGANT's GoPro camera that
10 were recorded on February 20, 2023, that were recorded prior to February 21, 2023, and that
11 were created on February 21, 2023. After reviewing several video recordings from February 21,
12 2023, Lying Billy realized that KING AROGANT had the entire verbal confrontation with
13 Jennifer Hutton-Heger recorded continuously. This is when rogue and charged in a criminal
14 federal district court dirty cop Billy S. Khounthavong came up with the idea to author and create
15 a bogus search warrant and then send KING AROGANT's continuous nearly fifteen-minute
16 GoPro video recording to the California Department of Justice regulated and funded County of
17 Los Angeles Sheriff's Office's Fraud and Cyber Crimes Bureau's Southern California High
18 Tech Task Force so corrupt and rogue peace officer detectives there could willfully, knowingly,
19 recklessly, carelessly, maliciously, wantonly, and callous alter, manipulate, edit, and taint KING
20 AROGANT's February 21, 2023, entirely exculpatory so they could all FRAME KING
21 AROGANT at his preliminary hearing for a very serious and violent felony they and Defendant
22 George Gascón all knew that KING AROGANT had never committed. Since February 21, 2023,
23 KING AROGANT stated to County of Los Angeles peace officers both over the telephone and
24 in person that he had exculpatory audio recording and text message evidence on his Samsung
25 Galaxy S21 Ultra mobile phone. Lying Billy either stole KING AROGANT's Samsung Galaxy
26 S21 Ultra mobile phone or disposed of his mobile phone. Billy Khounthavong recklessly

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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 JUDICIAL ABUSE OF PROCESS, 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 violated AROGANT's Fourth Amendment and Fourteenth Amendment constitutional civil
2 rights by deliberately disposing of KING AROGANT's mobile phone, which they all knew
3 contained an entirely exculpatory audio recording and text message evidence that KING
4 AROGANT could have used while acting in propria persona to exonerate himself. While KING
5 AROGANT's original February 21, 2023, GX010586 GoPro video recordings clearly depict and
6 display him with his mobile phone the entire time, and then placing it with the rest of his
7 personal property located inside of Jennifer Hutton Heger's home just prior to being recklessly
8 apprehended by rogue and dishonest County of Los Angeles peace officers Alex Contreras and
9 Daniel Esqueda, KING AROGANT never saw his Samsung Galaxy S21 Ultra mobile phone
10 again after February 21, 2023 at approximately 10:30 AM. Several weeks later, after KING
11 AROGANT was arrested, Lying Billy and other rogue County of Los Angeles peace officers
12 created a fabricated, false, phony, bogus, misleading, and fraudulent police report that stated that
13 they had searched diligently and thoroughly through all KING AROGANT's personal property
14 but did not locate or find his KING AROGANT's Samsung mobile phone. LIARS. All through
15 KING AROGANT'S original GoPro video recordings, he is seen with his mobile phone in his
16 hand! All through Defendant George Gascon, Defendant Lo, and LASD's manipulated GoPro
17 video recordings, KING AROGANT, is seen with his mobile phone in his hand! KING
18 AROGANT Samsung Galaxy S21 Ultra mobile phone was never lost or not transported to the
19 LASD Temple City police station on February 21, 2023. Lying Billy disposed of it because the
20 KING AROGANT's original GoPro video recordings watched by Lying Billy on February 21,
21 2023 alerted him to the facts that KING AROGANT's mobile phone contained on it exculpatory
22 audio recording and text message evidence that could have been used to exonerate KING
23 AROGANT. For example, in KING AROGANT's original, uninterrupted, and continuous
24 nearly seventeen-minute GoPro video recordings, KING AROGANT is visibly seen in this
25 video recordings checking the audio recording application on his recklessly disposed of by
26 Lying Bill Samsung S21 to make sure that it was recording the entire confrontation with

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 JUDICIAL ABUSE OF PROCESS, 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 Jennifer Hutton-Heger on the morning of February 21, 2023 In KING AROGANT's original,
2 uninterrupted, and continuous nearly seventeen-minute GoPro video recordings KING
3 AROGANT is visibly seen in this video recording sending two text messages to Jennifer Hutton
4 Heger on his recklessly disposed of by Lying Billy Samsung S21 that proved his state of mind
5 and his innocence. Lying Billy willfully, knowingly, recklessly, carelessly, maliciously,
6 wantonly, and callously made KING AROGANT's Samsung S21 Ultra mobile phone disappear
7 because it contained exculpatory evidence that would have exonerated KING AROGANT
8 easily. Given Billy S. Khounthavong's criminal indictment in the United States District Court
9 Central District Court of California for case number **13-3105M**. No one can believe anything he
10 says or does because Lying Billy is and was a very crooked and corrupt State of California
11 peace officer employed by the County of Los Angeles peace officer. In December 2013, Billy
12 Khounthavong and his brothers Johnny Khounthavong and Benny Khounthavong (both brothers
13 are peace officers) were all charged in the federal district court for the Central District Court of
14 California for recklessly falsifying federal mortgage loan documents. If Lying Billy
15 Khounthavong would willfully, knowingly, and recklessly falsify a federal loan document.
16 Surely Lying Billy would willfully, knowingly, recklessly, wantonly, maliciously, carelessly,
17 and callously falsify a police report and Superior Court of California, County of Los Angeles
18 search warrant affidavit, which is exactly what Lying Billy did in frivolous and unconstitutional
19 felony criminal case GA114055 on February 22, 2023.

20
21 60. At the rigged and unconstitutional preliminary hearing held on April 4, 2023, and April 5,
22 2023, rogue and corrupt peace officer Billy S. Khounthavong testified that he requested
23 Southern California High Tech Task Force peace officers download and retrieve
24 GoPro video recordings from KING AROGANT's GoPro camera that were recorded on
25 February 20, 2023, and February 21, 2023. Lying Billy's testimony proved that he illegally
26 accessed and retrieved KING AROGANT's GoPro video recordings prior to obtaining a search

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 warrant, and Lying Billy lied on his bogus supplemental police report that he had legally
2 obtained a search warrant from the Superior Court of California County of Los Angeles,
3 Pasadena Superior Court corrupt and racist criminal judicial officer Suzette Clover on February
4 22, 2023. Further, Lying Billy's testimony proved the foulness and extreme prejudice of
5 GA114055. Lying Billy's fabricated testimony proves the foulness and extreme prejudice of the
6 Superior Court of California, County of Los Angeles, Alhambra Superior Court case
7 GA114055. Lying Billy's phony and forged search warrant did not request to search KING
8 AROGANT's GoPro camera's video recordings that were recorded prior to February 21, 2023.
9 No Superior Court of California would have issued a search warrant allowing peace officers to
10 search a GoPro camera's video recordings recorded on February 20, 2023, when the criminal
11 threat was alleged to have occurred on February 21, 2023. KING AROGANT's GoPro video
12 recordings recorded on February 20, 2023, were entirely unrelated to both KING AROGANT's
13 arrest and false allegations and accusations recklessly and knowingly made by State of
14 California FAKE VICTIM government witness Jennifer Hutton-Heger. Even if Billy S.
15 Khounthavong's search warrant was valid (and it was not valid) it did not give him and other
16 LASD peace officers involved with the illegal criminal investigation legal authorization and
17 legal permission to review, access, copy, and otherwise seize KING AROGANT's GoPro video
18 recordings recorded on February 20, 2023 that were entirely unrelated to the make-believe
19 February 21, 2023 criminal threats arrest and incident that resulted in the false arrest of KING
20 AROGANT. Lying Billy, Defendant Lo, the County of Los Angeles Fraud and Cyber Crimes
21 Bureau's California Department of Justice funded and regulated Southern California High Tech
22 Task Force peace officers' illegal access, illegal search, illegal seizure, and illegal copy of
23 KING AROGANT's GoPro video recordings recorded on February 20, 2023, was far more of a
24 serious and scandalous United States Constitution Fourth Amendment Search and Seizure
25 Clause constitutional civil rights violation than Lying Billy's phony and bogus search warrant.
26 The only reason Lying Billy and his co-conspirator peace officers copied and searched 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 JUDICIAL ABUSE OF PROCESS, 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 February 20, 2023, video recordings was because they needed to find a GoPro
2 video recording of KING AROGANT shutting off his GoPro camera. Since Billy S.
3 Khounthavong and Southern California High Tech Task Force peace officers had reviewed
4 KING AROGANT's continuous GoPro video recording GX010586, they knew that there were
5 no GoPro video recordings of KING AROGANT shutting off his GoPro camera on February 21,
6 2023. A true AH HA moment for Defendants George Gascon and Leo Ka Fong Lo. This is why
7 in real GoPro video recordings GX010586, GX010587, GX010588, and GX010589 (all of
8 which were split up from original and continuous GoPro video recordings GX010586) and also
9 in police body camera video recordings depicting the February 21, 2023, incident KING
10 AROGANT is only seen on video wearing a long-sleeved coat and black pants, but in
11 Defendants George Gascon and Leo Ka Fong Lo's phony LASD-created GoPro video recording
12 GX010586 KING AROGANT is seen only on video wearing a tank top, shorts, and then he is
13 seen shutting off his GoPro camera with a bare right arm, proving further that KING
14 AROGANT had on a tank top in Defendants' phony and bogus LASD-
15 created GoPro video recording GX010586. In Defendants' phony and bogus LASD-created
16 GoPro video recording, GLO101587 is not seen standing in Jennifer Hutton Heger's mirror.



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, & NEGLIGENCE IIED

1 This particular video recording frame sequence was cut out and removed deliberately by LASD
2 Southern California High Tech Task Force peace officers who were employed to frame KING
3 AROGANT in furtherance of Defendant Lo, Defendant Gascon, LASD, and County of Los
4 Angeles' conspiracy to recklessly violate KING AROGANT's Fourth and Fourteenth
5 Amendment constitutional civil rights. In KING AROGANT's original, uninterrupted, and
6 continuous GoPro REAL video recording GX010586, KING AROGANT is seen standing in
7 Jennifer Hutton Heger's mirror with his reflection in the original GoPro video recording
8 depicting and displaying KING AROGANT wearing a long-sleeved coat, GoPro chest harness
9 with his GoPro camera attached, baggy pants, and KING AROGANT is depicted and displayed
10 having long dreadlocks hanging from his face and shoulders. This is why Defendant Geoge
11 Gascón's County of Los Angeles criminal prosecutors Brian MARK Rosenberg and Victor
12 Manuel Rodriguez, Billy S. Khounthavong, and Defendant Lo have done everything in their
13 power to keep phony LASD-created GoPro video recordings GX010586 and GX010587 out of
14 the hands of KING AROGANT, out of the hands of his two private investigators Carlos
15 Anthony Jackson, out of the hands of his private investigator Joel Wyenn, out of the hands of
16 lying and RACIST Superior Court of California audio recording and video recording expert
17 witness Thomas Leo Guzman-Sanchez, and out of the hands of criminal defense attorney Neil
18 Opdahl (SBN # 277596) [who was the court-appointed co-counsel in frivolous and
19 unconstitutional Superior Court of California, County of Los Angeles, Alhambra Superior Court
20 criminal case GA114055]. Disclosure would immediately end Defendant Gascón's false case
21 because, in phony LASD-created GoPro video recordings, GX010586 and GX010587, KING
22 AROGANT is not even wearing the same clothing he had on February 21, 2023. The reckless
23 actions of the above-stated Defendants to willfully, knowingly, recklessly, wantonly,
24 maliciously, carelessly, and callously present to the Superior Court of California, County of Los
25 Angeles, Alhambra Superior Court phony and bogus GoPro video recordings GX010586 and
26 GX010587 for the unlawful purpose of tricking, lying to, fooling, manipulating, and otherwise

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 JUDICIAL ABUSE OF PROCESS, 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 deceiving a criminal Superior Court that these phony LASD-created GoPro video recordings
2 were recorded by KING AROGANT on February 21, 2023, was reckless under color of law
3 fraud. The reckless actions of the above-stated Defendants to willfully, knowingly, recklessly,
4 wantonly, maliciously, carelessly, and callously present to the Superior Court of California,
5 County of Los Angeles, Alhambra Superior Court phony and bogus GoPro video recordings
6 GX010586 and GX010587 for the unlawful purpose of failing to tell, failing to inform,
7 concealing from, and otherwise deceiving a criminal Superior Court that these Defendants and
8 their co-conspirators were in possession of KING AROGANT's REAL GoPro video recordings
9 and knew that pursuant to California Evidence Code § 1522 they were committing under color
10 of law fraud by presenting phony LASD-created GoPro video recordings GX010586 and
11 GX010587 to the Alhambra Superior Court while the entire time KING AROGANT's original
12 GoPro video recordings were in the possession of Defendants Lo, Gascón, Victor Manuel
13 Rodriguez, Billy S. Khounthavong, Brian MARK Rosenberg, and many others, and they then
14 recklessly failed to present the original GoPro video recordings in the Superior willfully,
15 knowingly, recklessly, wantonly, maliciously, carelessly, and callously Court in support of their
16 false and fabricated case-in-chief. Further, Defendants Lo and Gascón willfully, knowingly,
17 recklessly, wantonly, maliciously, carelessly, and callously violated KING AROGANT's Fourth
18 Search and Seizure Amendment constitutional civil rights, and his Fourteenth Amendment Due
19 Process Clause constitutional civil rights by recklessly presenting to the Superior Court phony
20 LASD-created GoPro video recordings GX010586 and GX010587 while the original were in
21 Defendants' physical possession and while Defendants had no valid search warrant to had seized
22 KING AROGANT's original GoPro Heero 10 action camera in the first place.

23
24 61. Leo Ka Fong Lo, George Gascón, Billy S., Khounthavong, Brian MARK Rosenberg, and
25 Victor Manuel Rodriguez were able to willfully, knowingly, recklessly, wantonly, maliciously,
26 carelessly, and callously present to and in a criminal Superior Court of California courthouse

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 JUDICIAL ABUSE OF PROCESS, 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 phony, bogus, and misleading LASD-created GoPro video recordings GX010586 and
2 GX010587 on April 4, 2023, April 5, 2023, and February 2, 2024, without ever providing a
3 copy of each and every one of these phony LASD-created GoPro video recordings to KING
4 AROGANT or any member of KING AROGANT's criminal defense team between February
5 24, 2023, and October 26, 2024, despite KING AROGANT requesting in court, over the
6 telephone and through electronic mail over two dozen separate times that copies of phony and
7 bogus GoPro video recordings be turned over to KING AROGANT and his criminal defense
8 team because they had the back and support of in collusion and was part of conspiracy corrupt
9 and biased State of California judicial officer Michael Villalobos.

10
11 62. Leo Ka Fong Lo, George Gascón, Billy S., Khounthavong, Brian MARK Rosenberg, and
12 Victor Manuel Rodriguez were able to willfully, knowingly, recklessly, wantonly, maliciously,
13 carelessly, and callously present to and in a criminal Superior Court of California courthouse
14 phony, bogus, and misleading LASD-created GoPro video recordings GX010586 and
15 GX010587 on April 4, 2023, April 5, 2023, and February 2, 2024, without ever providing a
16 copy of each and every one of these phony LASD-created GoPro video recordings to KING
17 AROGANT or any member of KING AROGANT's criminal defense team between February
18 24, 2023, and October 26, 2024, despite KING AROGANT requesting through his court
19 motions and on the court record in open court over a dozen separate times that copies of phony
20 and bogus GoPro video recordings be turned over to KING AROGANT and his criminal
21 defense team because they had the backing and support of in collusion and part of conspiracy
22 corrupt and biased State of California judicial officer Michael Villalobos. Defendants Leo Ka
23 Fong Lo and George Gascón willfully, knowingly, recklessly, wantonly, maliciously, carelessly,
24 and callously violated KING AROGANT's constitutional United States Fourteenth Amendment
25 Due Process Clause civil rights, and the United States Constitution by them willfully,
26 knowingly, recklessly, wantonly, maliciously, carelessly, and callously presenting to and in a

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 JUDICIAL ABUSE OF PROCESS, 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 criminal Superior Court of California courtroom phony and bogus LASD GoPro video
2 recordings GX010586 and GLO010587 on April 4, 2023, April 5, 2023, and February 2, 2024,
3 without ever turning them over to KING AROGANT or any member of his criminal defense
4 team (*Carlos Anthony Jackson, Joel Wyenn, Thomas Guzman-Sanchez, and Neil Opdahl*
5 (*SBN # 277596*), phony GoPro video recordings in which Defendants Gascón and Lo knew that
6 KING AROGANT was not even seen wearing the same clothing that he had on February 21,
7 2023.

8
9 63. Defendant George Gascón has proven to be a racist and biased County of Los Angeles
10 district attorney, as he has in October 2024 filed a motion that requested that a Superior Court of
11 California criminal judicial officer resentence stone cold parental murders Erik Galen Menendez
12 and Joseph Lyle Menedez while he has during the same time period (November 28, 2023 to
13 October 26, 2024) willfully, knowingly, recklessly, wantonly, maliciously, carelessly, and
14 callously ignored and disregard newly discovered video recording evidence that was
15 electronically served upon him that proved by clear and convincing evidence that KING
16 AROGANT was innocent, but Gasón was also electronically served clear and convincing
17 evidence that proved his criminal prosecutors and LASD criminal investigators willfully,
18 knowingly, recklessly, wantonly, maliciously, carelessly, and callously framed KING
19 AROGANT by presenting to and in a criminal State of California courtroom phony LASD
20 GoPro video recordings GX010586 and GL01587, which were recklessly manipulated, edited,
21 created, and recreated from KING AROGANT's original continuous and uninterrupted original
22 GoPro video recording GX010586 by County of Los Angeles Sheriff's Office Fraud and Cyber
23 Crime Bureau's California Department of Justice funded and regulated Southern California
24 High Tech Task Force in which KING AROGANT depicted in the phony LASD-created GoPro
25 video recordings GX010586 and GX010587 wearing different clothing than he had on February
26 21, 2023. Pursuant to County of Los Angeles District Attorney Legal Policies and Procedures,
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 JUDICIAL ABUSE OF PROCESS, 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 County of Los Angeles District Attorney Discovery Compliance System Manual, County of Los
2 Angeles District Attorney Disclosure of Exculpatory and Impeachment Information, County of
3 Los Angeles District Attorney Special Directive 20-13 (CONVICTION INTEGRITY UNIT),
4 and State Bar of California Rules of Professional Conduct Rule 3.8 Special Responsibilities of a
5 Prosecutor (Rule Approved by the Supreme Court, Effective June 1, 2020) Defendant George
6 Gasón willfully, knowingly, recklessly, wantonly, maliciously, carelessly, and callously violated
7 KING AROGANT's United States Fourteenth Amendment Due Process Clause constitutional
8 civil rights by recklessly failing to aid and assist KING AROGANT with overturning his
9 wrongful conviction between November 28, 2023, and October 25, 2024, and by recklessly
10 failing to turn over and disclose impeaching LASD-created GoPro video recordings GX010586
11 and GX010587 between February 21, 2023 and October 26, 2023, which were while recklessly
12 admitted into the Superior Court of California, County of Los Angeles, Alhambra Superior
13 Court criminal courthouse, Department 1, they were never lodged with this criminal Superior
14 Court of California, and no such copy of phony LASD-created GoPro video recordings was ever
15 given to corrupt and biased judicial officer Michael Villalobos or his judicial assistant.
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64. Defendant George Gascón has proven to be a racist and biased County of Los Angeles district attorney, as he has in October 2024 filed a motion that requested that a Superior Court of California criminal judicial officer resentence stone cold parental murders Erik Galen Menendez and Joseph Lyle Menedez while he has during the same time period (November 28, 2023 to October 26, 2024) willfully, knowingly, recklessly, wantonly, maliciously, carelessly, and callously ignored and disregard newly discovered physical evidence that was electronically served upon him that proved by clear and convincing evidence that KING AROGANT was innocent, but Gasón was also electronically served clear and convincing evidence that proved his criminal prosecutors and LASD criminal investigators willfully, knowingly, recklessly, wantonly, maliciously, carelessly, and callously framed KING AROGANT by creating a phony and bogus search warrant affidavit that no Superior Court of California criminal courthouse has records of ever being filed, by recklessly presenting to a Superior Court of California criminal

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1 courtroom as evidence a phony, bogus, and forged Superior Court of California, and County of
2 Los Angeles outdated probable cause determination declaration that was used to illegal keep
3 KING AROGANT in criminal custody wrongfully, Pursuant to County of Los Angeles District
4 Attorney Legal Policies and Procedures, County of Los Angeles District Attorney Discovery
5 Compliance System Manual, County of Los Angeles District Attorney Disclosure of
6 Exculpatory and Impeachment Information, County of Los Angeles District Attorney Special
7 Directive 20-13 (CONVICTION INTEGRITY UNIT), and State Bar of California Rules of
8 Professional Conduct Rule 3.8 Special Responsibilities of a Prosecutor (Rule Approved by the
9 Supreme Court, Effective June 1, 2020) Defendant George Gascón willfully, knowingly,
10 recklessly, wantonly, maliciously, carelessly, and callously violated KING AROGANT's United
11 States Fourteenth Amendment Due Process Clause constitutional civil rights by recklessly
12 failing to aid and assist KING AROGANT with overturning his wrongful conviction between
13 November 28, 2023, and October 25, 2024, and by recklessly failing to launch as investigation
14 as to why his criminal prosecutors and LASD investigators created a phony and bogus search
15 warrant and a phony and bogus certificate of probable cause declaration, and then presented
16 them as evidence against KING AROGANT. The phony and bogus search warrant and bogus
17 probable cause declarations presented to and in the Superior Court of California, County of Los
18 Angeles Superior criminal courthouse against KING AROGANT recklessly violated California
19 Evidence Code § § 1400, 1401, and 1530, and Superior Court of California, County of Los
20 Angeles], Criminal Rule 8.17, Obtaining Court Files, because phony and bogus search warrant
21 and forged probable cause determination were not certified, attested, and authenticated by any
22 Superior Court of California criminal courthouse.

23
24 65. KING AROGANT's numerous requests and verbal statements over the telephone and in-
25 person on February 21, 2023, between 11 AM and 6 PM that he had audio recording, text
26 message, and video recording evidence on his Samsung Galaxy S21 Ultra mobile phone and

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1 GoPro camera prove by his factual innocence by clear and convincing evidence. Why would
2 KING AROGANT say he had evidence on his mobile phone and GoPro camera if he had
3 actually threatened to kill state of California FAKE VICTIM government witness Jennifer
4 Hutton Heger. Why would KING AROGANT request that evidence on his mobile phone and
5 GoPro camera be brought to him so he could show it to rogue, biased, and RACIST County of
6 Los Angeles peace officers if he had actually threatened to kill state of California FAKE
7 VICTIM government witness Jennifer Hutton Heger. IT MAKES NO SENSE!

8
9 66. KING AROGANT, on February 21, 2023, telling County of Los Angeles peace officers
10 and employees both employed by the County of Los Angeles Sheriff's Department and County
11 of Los Angeles Office of Inspector General to bring him his mobile phone and GoPro camera so
12 that he could show them audio recording, text message, and video recording evidence that he
13 had never threatened to physically harm lying Jennifer Hutton-Heger proved KING
14 AROGANT's factual innocence by clear and convincing evidence. Why would KING
15 AROGANT show County of Los Angeles peace officers evidence on his mobile phone and
16 GoPro camera if it would show him threatening, FAKE, AND LYING VICTIME Jennifer
17 Hutton-Heger? KING AROGANT telling County of Los Angeles District Attorney's Office
18 Alhambra Field Office employees, County of Los Angeles Temple City police station peace
19 officers, and County of Los Angeles Office of Inspector General employees that County of Los
20 Angeles Sheriff's Department peace officers were recklessly not giving him access to his
21 Samsung Galaxy S21 Ultra mobile phone and GoPro camera so that KING AROGANT could
22 show them entirely exculpatory evidence that was stored on both his Samsung Galaxy S21 Ultra
23 mobile phone and GoPro camera, proves KING AROGANT's factual innocence by clear and
24 convincing evidence in frivolous, illegal, fraudulent, unconstitutional, and bogus Superior Court
25 of California, County of Los Angeles, Alhambra Superior Court felony criminal case
26 GA114055.

27
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67. On or about March 1, 2023, at approximately 11 AM KING AROGANT called County of Los Angeles District Attorney's Office Chief Deputy District Attorney Sharon Lee Woo (SBN # 148139) by dialing Sharon Woo's direct business telephone number of (213) 257-2928. KING AROGANT spoke to Sharon Woo's legal secretary Leanne Flores, KING AROGANT told Leanne Flores he wanted to speak to Sharon Lee Woo. Leanne Flores told KING AROGANT that Sharon Woo was presently unavailable as she was engaged in a meeting. KING AROGANT then left a message with Leanne Flores requesting that she tell Sharon Woo that she should immediately dismiss frivolous case GA114055 because the Certificate of Probable Cause was fake and on it County of Los Angeles peace officer Aaron D. Contreras forged judicial officer Jana Seng's signature. Leanne Flores told KING AROGANT that she would deliver his message to Sharon Lee Woo. Of course, Aaron D. Contreras' probable cause determination declaration was a phony. Jana Seng, on February 21, 2023, was the Assistant Supervising Judge of the Superior Court of California, Criminal Division, Traffic for the County of Los Angeles Superior Court, and the site judicial officer of the Superior Court of California, County of Los Angeles, Metropolitan Courthouse.

68. On or about March 1, 2023, at approximately 2 PM, KING AROGANT called the County of Los Angeles District Attorney's Office Assistant District Attorney James William Garrison (SBN # 157070) (third in charge of County of Los Angeles DA office) by the dialing the telephone number listed on his State Bar of California attorney profile which was (213) 257-3198. After two to three rings, James Garrison, his direct business office telephone line. KING AROGANT told James Garrison that he should immediately dismiss the criminal threats case filed against him because the County of Los Angeles District Attorney's Office Superior Court probable cause determination was forged and fraudulent. James Garrison then replied to KING AROGANT by saying the following nearly verbatim: "*Hang on a second. What case are you talking about? What is the case number?*" KING AROGANT told James Garrison that the

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1 criminal charges recklessly filed against him should be dismissed because rogue and dishonest
2 County of Los Angeles peace officer Aaron D. Contreras forged the signature of Superior Court
3 of California judicial officer Jana Seng on the certificate of probable cause he submitted to the
4 County of Los Angeles District Attorney's Office. James Garrison responded by telling KING
5 AROGANT, he had to talk to the prosecutor assigned to his case. When KING AROGANT then
6 replied to James Garrison by verbally stating that he had a legal obligation to dismiss the
7 frivolous felony case based on the phony and forged probable cause submitted to the County of
8 Los Angeles District Attorney's office by rogue County of Los Angeles peace officer Aaron D.
9 Contreras recklessly. James Garrison responded to KING AROGANT's commanding and
10 precise verbal statements by recklessly ending their short telephone conversation by
11 disconnecting his telephone line without warning.

12
13 69. From February 21, 2023, until April 1, 2024, the County of Los Angeles District
14 Attorney's Office's organization chart chain of command was:

- 15
- 16 1. George Gascón
- 17 2. Sharon Lee Woo
- 18 3. James William Garrison
- 19

20 See below the County of Los Angeles District Attorney's Functional Organization Chart,
21 updated on November 6, 2023. Not only was James Garrison the third in command of the
22 County of Los Angeles DA's office between February 21, 2023, and April 1, 2024, he was also
23 the criminal prosecutor in charge of and overseeing all operations of district attorney field
24 offices, including but not limited to Alhambra Field Office. Also attached to the Appendix of
25 Exhibits, Exhibit.

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27
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1 peace officer Aaron D. Contreras willfully, knowingly, recklessly, wantonly, maliciously,
2 carelessly, and callously forged and falsified the electronic signature of judicial officer Jana
3 Seng on an outdated, prohibited, and unusable Superior Court of California, County of Los
4 Angeles certificate of probable determination declaration.

5
6 72. On April 5, 2023, at approximately 3 PM, KING AROGANT called County of Los
7 Angeles District Attorney's Office criminal prosecutor James William Garrison (**SBN # 157070**)
8 by dialing the telephone listed on his State Bar of California attorney profile, which was (213)
9 257-3198. After only two to three rings, James Garrison answered his direct telephone line.
10 KING AROGANT told James Garrison that his state government witness Jennifer Hutton-Heger
11 had just testified falsely that she told rogue County of Los Angeles peace officer Aaron D.
12 Contreras that she saw KING AROGANT brandishing a knife, that she and rogue peace officers
13 Aaron Contreras and Daniel Esqueda did a reenactment of the make-believe knife incident, that
14 she, Contreras and Esqueda asked her several questions about the make-believe knife incident,
15 that rogue peace officers Aaron D. Contreras and Daniel Esqueda never recovered the knife.
16 KING AROGANT told James Garrison that based on Jennifer Hutton Heger's false testimony,
17 the felony criminal threats case should be dismissed. James Garrison told KING AROGANT
18 that if he thought something was wrong, he should talk to the judge. KING AROGANT then
19 replied to James Garrison by telling him that it was his responsibility to do something about his
20 DDA Brian Mark Rosenberg, allowing Jennifer Hutton-Heger to testify falsely. Just like the on
21 or about March 1, 2023, during this April 5, 2023, telephone conversation, James Garrison
22 disconnected his telephone line in the face of KING AROGANT without warning.

23
24 73. Pursuant to *Napue v. People of Illinois*, 360 U.S. 264, 79 S. Ct. 1173, 3 L.Ed 2d 1217
25 (1959) on April 5, 2023, Mark Rosenberg and James Garrison had a legal obligation to dismiss
26 frivolous felony case GA114055 because their star state government witness Jennifer Hutton-

27
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1 Heger testified to numerous false and material statements, some of which contradicted and
2 proved false during KING AROGANT's cross-examination of Billy S. Khounthavong. For
3 example, during his cross-examination testimony, rogue peace officer Lying Billy admitted that
4 there were no allegations in the February 21, 2023 County of Los Angeles Sheriff's Department
5 police report about any knife incident. Billy Khounthavong's testimony immediately proved that
6 Jennifer Hutton-Heger's testimony of"

7
8 1. She told rogue peace officers Aaron D. Contreras and Daniel Esqueda that KING
9 KING AROGANT was brandishing a knife in her kitchen.

10
11 2. Hutton-Heger, Aaron Contreras, and Daniel Esqueda did a reenactment of the knife
12 incident.

13
14 3. That rogue peace officers Aaron Contreras and Daniel Esqueda asked Hutton-Heger
15 several questions about the make-believe knife incident.

16
17 4. That rogue peace officers Aaron Contreras and Daniel Esqueda did not retrieve the knife
18 that they did a reenactment of.

19
20 5. That Hutton-Heger still has the knife that Aaron Contreras and Daniel Esqueda failed
21 to recover.

22
23 WAS ALL 100%, absolutely FALSE.

24
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1 "It is of no consequence that the falsehood bore upon the
2 witness' credibility, rather than directly upon defendant's
3 guilt. A lie is a lie, no matter what its subject, and, if it is
4 in any way relevant to the case, the district attorney has the
5 responsibility and duty to correct what he knows to be false and
6 elicit the truth...

7
8 *Napue v. People of Illinois*, 360 U.S. 264, 79 S. Ct. 1173, 3 L.Ed 2d 1217 (1959) at 360 US 269.

9 See now frivolous criminal case GA114055's preliminary hearing transcripts, Day 1 at pages
10 ____, attached hereto as Verified Appendix of Exhibits, Exhibit ____.

11 74. *Napue v. People of Illinois* placed a duty on Defendant Gascón and his deputy district
12 attorneys to immediately dismiss KING AROGANT's unconstitutional and falsified criminal
13 charges pursuant to California Business and Professions Code Section 6068, State Bar of
14 California Rules of Professional Conduct Rules 3.1, 3.2, and 3.8, and pursuant to County of Los
15 Angeles District Attorney's Office Legal Policies and Procedures. Defendant Gascón willfully,
16 knowingly, carelessly, wantonly, maliciously, and callously violated the United States
17 Constitution and KING AROGANT's United States Constitutional Fourteenth Amendment
18 constitutional civil rights by Gascón recklessly allowing Jennifer Hutton-Heger to testify falsely
19 that KING AROGANT was not only brandishing a knife in her home but that she also did a
20 reenactment with rogue County of Los Angeles peace officers Aaron D. Contreras and Daniel
21 Esqueda, who failed to recover the knife and then failing to correct false testimony that
22 Defendant Gascón and his criminal prosecutors knew was false after the rogue County of Los
23 Angeles peace officer Billy S. Khounthavong testified in the Superior Court of California
24 criminal courthouse located at 150 West Commonwealth Avenue, Alhambra, CA 91801 that
25 there was no statements or information in Aaron Contreras and Daniel Esqueda's police report
26 that Jennifer Hutton-Heger told them that KING AROGANT was brandishing a knife inside her

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1 home on February 21, 2023.

2
3 75. On December 2, 2002, California State Assembly introduced bill AB-49, an act to
4 amend Section 13848.6 of the Penal Code, relating to crime whose LEGISLATIVE
5 COUNSEL'S DIGEST provided:

6
7 AB 49, as introduced, Simitian. Crimes.

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

17 This bill would, expand the goals for law enforcement attention as identified by the
18 committee to include the apprehension and prosecution of individuals and groups
19 engaged in unlawful access, disruption, or destruction of public utilities or other state
20 infrastructure. This bill would also create the California Cyber Crimes Task Force which
21 would be comprised of each regional task force funded by the High Technology Theft
22 Apprehension and Prosecution Program. In addition, this bill would provide that the
23 committee would annually review the effectiveness of the California Cyber Crimes Task
24 Force.

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1 Vote: majority. Appropriation: no. Fiscal committee: yes.

2 State-mandated local program: no.

3
4 THE PEOPLE OF THE STATE OF CALIFORNIA DO ENACT AS FOLLOWS:

5
6 **SECTION 1. Section 13848.6 of the Penal Code is amended to read:**

7
8 13848.6. (a) The High Technology Crime Advisory Committee is
9 hereby established for the purpose of formulating a comprehensive
10 written strategy for addressing high technology crime throughout the
11 state and to advise the Office of Criminal Justice Planning on the
12 appropriate disbursement of funds to regional task forces.

13
14 (b) This strategy shall be designed to be implemented through
15 regional task forces. In formulating that strategy, the committee
16 shall identify various priorities for law enforcement attention,
17 including the following goals:

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

20
21 (A) Theft of computer components and other high technology
22 products.

23
24 B) Violations of Penal Code Sections 211, 350, 351a, 459, 496,
25 537e, 593d, and 593e.

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1 (C) Theft of telecommunications services and other violations of
2 Penal Code Sections 502.7 and 502.8.

3
4 (D) Counterfeiting of negotiable instruments and other valuable
5 items through the use of computer technology.

6
7 (E) Creation and distribution of counterfeit software and other
8 digital information, including the use of counterfeit trademarks to
9 misrepresent the origin of that software or digital information.

10
11 (2) To apprehend and prosecute individuals and groups engaged in
12 the unlawful access, destruction, or unauthorized entry into and use
13 of private, corporate, or government computers and networks,
14 including wireless and wireline communications networks and law
15 enforcement dispatch systems, and the theft, interception,
16 manipulation, destruction, and unauthorized disclosure of data stored
17 within those computers.

18
19 (3) To apprehend and prosecute individuals and groups engaged in
20 the theft of trade secrets.

21
22 (4) To investigate and prosecute high technology crime cases
23 requiring coordination and cooperation between regional task forces
24 and local, state, federal, and international law enforcement
25 agencies.

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1 (5) *To apprehend and prosecute individuals and groups engaged in*
2 *the unlawful access, disruption, or destruction of public utilities*
3 *or other state infrastructure.*

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

- 6 (1) A designee of the California District Attorneys Association.
7 (2) A designee of the California State Sheriffs Association.
8 (3) A designee of the California Police Chiefs Association.
9 (4) A designee of the Attorney General.
10 (5) A designee of the California Highway Patrol.
11 (6) A designee of the High-Tech Criminal Investigators Association.
12 (7) A designee of the Office of Criminal Justice Planning.
13 (8) A designee of the American Electronic Association to represent California computer
14 system manufacturers.
15 (9) A designee of the American Electronic Association to represent
16 California computer software producers.
17 (10) A designee of the California Cellular Carriers Association.
18 (11) A representative of the California Internet industry.
19 (12) A designee of the Semiconductor Equipment and Materials
20 International.
21 (13) A designee of the California Cable Television Association.
22 (14) A designee of the Motion Picture Association of America.
23 (15) A designee of either the California Telephone Association or
24 the California Association of Long Distance Companies. This position
25 shall rotate every other year between designees of the two
26 associations
27 (16) ~~A designee of the Science and Technology Agency, if~~
28 ~~Senate Bill 1136 is enacted, and, as enacted, creates the Science and~~
~~Technology Agency, otherwise, a designee of the Department of~~
~~Information Technology.~~
~~(17) A representative of the California banking~~
~~industry.~~

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1 (d) The Executive Director of the Office of Criminal Justice
2 Planning shall designate the Chair of the High Technology Crime
3 Advisory Committee from the appointed members.
4

5 (e) The advisory committee shall not be required to meet more than
6 12 times per year. The advisory committee may create subcommittees
7 of its own membership, and each subcommittee shall meet as often as
8 the subcommittee members find necessary. It is the intent of the
9 Legislature that all advisory committee members shall actively
10 participate in all advisory committee deliberations required by this
11 chapter.
12

13 Any member who, without advance notice to the executive director and without
14 designating an alternative representative, misses three scheduled meetings in any
15 calendar year for any reason other than severe temporary illness or injury (as determined
16 by the Executive Director of the Office of Criminal Justice Planning) shall
17 automatically be removed from the advisory committee. If a member wishes to send an
18 alternative representative in his or her place, advance written notification of this
19 substitution shall be presented to the executive director. This notification shall be
20 required for each meeting the appointed member elects not to attend.
21

22 Members of the advisory committee shall receive no compensation for their services,
23 but shall be reimbursed for travel and per diem expenses incurred as a result of attending
24 meetings sponsored by the Office of Criminal Justice Planning under this chapter.
25

26 (f) The executive director, in consultation with the High Technology Crime Advisory
27

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DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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NEGLIGENT HED**

1 Committee, shall develop specific guidelines and administrative procedures for the
2 selection of projects to be funded by the High Technology Theft Apprehension and
3 Prosecution Program, which guidelines shall include the following selection criteria:

4
5 (1) Each regional task force that seeks funds shall submit a
6 written application to the committee setting forth in detail the
7 proposed use of the funds.

8
9 (2) In order to qualify for the receipt of funds, each proposed
10 regional task force submitting an application shall provide written
11 evidence that the agency meets either of the following conditions:

12
13 (A) The regional task force devoted to the investigation and
14 prosecution of high technology-related crimes is comprised of local
15 law enforcement and prosecutors, and has been in existence for at
16 least one year prior to the application date.

17
18 (B) At least one member of the task force has at least three years
19 of experience in investigating or prosecuting cases of suspected
20 high technology crime.

21
22 (3) *Each regional task force shall be identified by a name*
23 *that is appropriate to the area that it serves.* In order to
24 qualify for funds, a regional task force shall be comprised of local
25 law enforcement and prosecutors from at least two counties. At the time
26 of funding, the proposed task force shall also have at least one investigator

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 JUDICIAL ABUSE OF PROCESS, 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 assigned to it from a state law enforcement agency.

2 Each task force shall be directed by a local steering committee
3 composed of representatives of participating agencies and members of
4 the local high technology industry.

5
6 (4) The California Cyber Crimes Task Force shall be comprised
7 of each regional task force developed pursuant to this subdivision.

8
9 (5) Additional criteria that shall be considered by the
10 advisory committee in awarding grant funds shall include, but not be
11 limited to, the following:

12
13 (A) The number of high technology crime cases filed in the prior
14 year.

15
16 (B) The number of high technology crime cases investigated in the
17 prior year.

18
19 (C) The number of victims involved in the cases filed.

20
21 (D) The total aggregate monetary loss suffered by the victims,
22 including individuals, associations, institutions, or corporations,
23 as a result of the high technology crime cases filed, and those under
24 active investigation by that task force.

25 ~~(5)~~

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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 JUDICIAL ABUSE OF PROCESS, 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 (6) Each regional task force that has been awarded funds
2 authorized under the High Technology Theft Apprehension and
3 Prosecution Program during the previous grant-funding cycle, upon
4 reapplication for funds to the committee in each successive year,
5 shall be required to submit a detailed accounting of funds received
6 and expended in the prior year in addition to any information
7 required by this section. The accounting shall include all of the
8 following information:

9
10 (A) The amount of funds received and expended.

11
12 (B) The use to which those funds were put, including payment of
13 salaries and expenses, purchase of equipment and supplies, and other
14 expenditures by type.

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

17
18 (g) The committee shall annually review the effectiveness of the
19 ~~regional task forces created~~ *the California*
20 *Cyber Crimes Task Force* in deterring, investigating, and
21 prosecuting high technology crimes and provide its findings in a
22 report to the Legislature and the Governor. This report shall be
23 based on information provided by the regional task forces in an
24 annual report to the committee which shall detail the following:

25 (1) Facts based upon, but not limited to, the following:
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 JUDICIAL ABUSE OF PROCESS, 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 (A) The number of high technology crime cases filed in the prior
2 year.

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

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

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

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

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

(A) The amount of funds received and expended.

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

(C) Any other relevant information requested.

15 See AB-49 (2002) below.

16 [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)
17 [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)

18
19 See AB-49 2002 California Senate Bill attached to **Verified Appendix of Exhibits,**
20 **Exhibit _____**

21 The evidence is clear here above that Defendants Lo and Gascón willfully, knowingly,
22 recklessly, wantonly, maliciously, carelessly, and callously violated the United States
23 Constitution and AROGANT's Fourth Amendment Search and Seizure Clause and Fourteenth A
24 mendment Due Process Clause by recklessly viewing, reviewing, copying, editing,
25 manipulating, and even investigating GoPro video recordings related to frivolous and
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

1 unconstitutional Superior Court of California criminal case GA114055 because Defendant Lo,
2 and all other involved County of Los Angeles Sheriff's Department Fraud and Cyber Crimes
3 Bureau's Southern California High Tech Task Force peace officers could legally touch KING
4 AROGANT's GoPro camera and review his GoPro video recordings because investigating
5 criminal threats investigations was not authorized by 2002's AB-49, and nor was it authorized
6 by California Penal Code § 13848.6. AB-49. Neither statute or bill authorized rogue County of
7 Los Angeles peace officers to waste and expend California state funds by investigating a
8 criminal threats investigation. Thus, it was foul play and proved the motives of Defendants
9 Gascón and Lo in such illegal police activity occurring between February 21, 2023, and March
10 28, 2023, only.

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

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

22
23 See now

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

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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 JUDICIAL ABUSE OF PROCESS, 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 See **Verified Appendix of Exhibits, Exhibit ____**. See also the first page of the County
2 of Los Angeles Sheriff's Department Headquarters Response to the Final Report of the
3 2010-11 Los Angeles County Civil Grand Jury, signed by former County of Los Angeles
4 Sheriff's Department peace officer Sheriff Leroy D. Baca.

5
6 The evidence is clear here above that Defendants Lo and Gascón willfully, knowingly,
7 recklessly, wantonly, maliciously, carelessly, and callously violated the United States
8 Constitution and AROGANT's Fourth Amendment Search and Seizure Clause and
9 Fourteenth Amendment Due Process Clause by recklessly viewing, reviewing, copying,
10 editing, manipulating, and even investigating GoPro video recordings related to frivolous
11 and unconstitutional Superior Court of California criminal case GA114055 because
12 Defendant Lo, and all other involved County of Los Angeles Sheriff's Department Fraud
13 and Cyber Crimes Bureau's Southern California High Tech Task Force peace officers
14 could legally touch KING AROGANT's GoPro camera and review his GoPro video
15 recordings because investigating criminal threats investigations was not authorized by
16 2002's AB-49, and nor was it authorized by California Penal Code § 13848.6. AB-49.
17 Neither statute or bill authorized rogue County of Los Angeles peace officers to waste
18 and expend California state funds by investigating a criminal threats investigation. Thus,
19 it was foul play and proved the motives of Defendants Gascón and Lo in such illegal
20 police activity occurring between February 21, 2023, and March 28, 2023, only.

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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**



County of Los Angeles
Sheriff's Department Headquarters
4700 Ramona Boulevard
Monterey Park, California 91754-2169



LEROY D. BACA, SHERIFF

August 19, 2011

The Honorable Board of Supervisors
County of Los Angeles
383 Kenneth Hahn Hall of Administration
Los Angeles, California 90012

Dear Members of the Civil Grand Jury:

**RESPONSE TO THE FINAL REPORT OF THE 2010-11
LOS ANGELES COUNTY CIVIL GRAND JURY**

Attached is the Los Angeles County Sheriff's Department's (Department) response to the 2010-11 Civil Grand Jury Report recommendations (Attachment A). The Civil Grand Jury's areas of interest specific to the Department included our participation in the E-Subpoena, High Tech Forensics and Cyber Security Crime Fighting in the Digital Age, Education Based Incarceration, The Six Pods of Module 172, and Jails Committee. Should you have questions regarding our response, please contact Division Director Victor Rampulla at (323) 526-5357.

Sincerely,

LEROY D. BACA
SHERIFF

A Tradition of Service

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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, & NEGLIGENCE IED

ATTACHMENT B

RESPONSE TO THE GRAND JURY FINAL REPORT

COUNTY OF LOS ANGELES – SHERIFF'S DEPARTMENT

SUBJECT: 2010-2011 GRAND JURY RECOMMENDATIONS FOR
HIGH TECH FORENSICS AND CYBER SECURITY
CRIME FIGHTING IN THE DIGITAL AGE

RECOMMENDATION NO. 2a

The Los Angeles County Sheriff's Department (LASD), along with other police agencies in Los Angeles County, shall establish a "High Tech Forensics Bureau" which will facilitate:

- Promotions and career opportunity for those who are trained and skilled in this area without leaving the discipline.
- Succession planning and transfer of high tech expertise, preserving the investment made in creating the expertise.

RESPONSE

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

- i. LASD acknowledges that it would be desirable to foster promotions and career advancement for those investigators currently assigned to the high tech task force. Maintaining experienced investigators in an ever changing technical world would enable the seamless transitioning of personnel promotions within the unit enabling the retention of trained personnel. Unfortunately court mandated processes require centralized testing to place personnel in coveted positions, and due to past and current promotional practices, significant changes in policy and civil service rules will have to occur in order to implement this recommendation.
- ii. On September 1, 2011, LASD will add three investigators to SCHTTF to augment the current number of nine investigators who handle forensic computer examinations and cyber investigations. The reason for the additional investigators is to train the new investigators and prepare them to replace pending retirements of currently assigned veteran investigators. It typically takes years to fully train cyber investigators and the three new investigators should make for a seamless transition when the retirements do occur.

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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 JUDICIAL ABUSE OF PROCESS, 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, HIED, & NEGLIGENT HIED

1 77. On February 21, 2023, KING AROGANT was falsely arrested by rogue and biased
2 LASD Temple City peace officers Aaron D. Contreras and Daniel Esqueda for making
3 criminal threats.

4
5 78. On February 21, 2023, shortly after arriving at Temple City adult detention center,
6 KING AROGANT told rogue detective peace officer Billy Khounthavong and his
7 superior peace officer sergeant Richard Lewis that if they brought him his mobile phone
8 and GoPro camera, he could present to them audio and video evidence that would prove
9 he did not make any criminal threats.

10
11 79. On February 22, 2023, rogue and corrupt LASD peace officer Billy Khounthavong
12 and his superior, Richard Lewis, willfully, knowingly, maliciously, wantonly, carelessly,
13 and callously conspired to violate KING AROGANT's constitutional civil rights by
14 disposing of his Samsung Galaxy S21 Ultra mobile phone, for which KING AROGANT
15 told them contained on them audio recordings and text messages that would exonerate
16 him.

17
18 80. On February 22, 2023, rogue peace officer Billy S. Khounthavong filed a bogus
19 police report alleging that a search warrant for KING AROGANT's GoPro camera was
20 issued by the dishonest, racist, and biased Superior Court of California, County of Los
21 Angeles, Pasadena Superior Court judicial officer Suzette Clover. The search warrant
22 was so bogus that KING AROGANT never received a certified copy of it despite
23 requesting it on numerous occasions before the Superior Court and prejudiced judicial
24 officer Michael Villalobos. The bogus warrant was alleged to have been electronically
25 filed, yet it did not have the words duplicate original written on it, and it did not have the
26 execution date and time written on it. KING AROGANT was never served the phony

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 JUDICIAL ABUSE OF PROCESS, 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 warrant, and he did not receive a copy of Lying Billy's bogus search warrant until March
2 2023. There were a few obvious signs that proved that Billy S. Khounthavong's search
3 warrant was a phony. (1) The phony search warrant had no search warrant number on it.
4 (2) The search warrant failed to show an electronic Superior Court of California court
5 clerk's stamp in the following format:

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

13
14 81. No search warrant return was ever filed with the Superior of California, County of
15 Los Angeles, Pasadena Superior Court, and attached to the phony search warrant that was
16 given to KING AROGANT inside Department 1 of the Superior Court of California,
17 County of Los Angeles, Alhambra Superior Court by rogue, biased, and RACIST deputy
18 district attorney Brian MARK Rosenberg (**SBN # 291501**) in late March 2023. See now
19 rogue peace officer Billy S. Khounthavong's phony search warrant attached to **Verified**
20 **Appendix of Exhibits, Exhibit _____**, and attached herein to this legal brief below.
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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

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LASD File # _____ SW NO. _____

SUPERIOR COURT OF CALIFORNIA
County of Los Angeles

SEARCH WARRANT



Detective Billy Khounthavong #662180 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]
 (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 8638 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. 06-11-18 10 Page 1 of 2

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 JUDICIAL ABUSE OF PROCESS, 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 82. Billy S. Khounthavong and Brian MARK Rosenberg's phony search warrant was
2 presented to Department 1, Superior Court of California, County of Los Angeles,
3 Alhambra Superior Court, while no mandatory LASC COUNTYWIDE WARRANT
4 SYSTEM INITIAL CASE FILING FORM (LASC CRIM 126, Revised in January 2020).
5 Without this mandatory form, LASC 126. Defendant George Gascón's frivolous and
6 unconstitutional criminal case should never have been filed. Defendants Gascón and Lo's
7 case should have never been filed, and these Defendants also illegally seized, copied,
8 altered, and searched KING AROGANT's GoPro camera and AROGANT's GoPro
9 camera video recordings stored on his GoPro camera's Micro SD card. **See Verified**
10 **Appendix of Exhibits, Exhibit ____**. Also, see LASC mandatory judicial form LASC
11 CRIM 126 attached hereto below.

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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

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**SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES
COUNTYWIDE WARRANT SYSTEM
INITIAL CASE FILING FORM**

Reserved for Clerk's File Stamp
CASE NUMBER

**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 CR#M 128 Rev. 01/20
For Mandatory Use

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 JUDICIAL ABUSE OF PROCESS, 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 83. 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 brothers,
4 Benny Khounthavong and Johnny Khounthavong, with making false statements and
5 reports to Flagstar Bank and Bank of America for the purpose of influencing these banks.
6 If Billy Khounthavong would be willing to falsify a federal loan document, surely he
7 would be willing to falsify a Superior Court of California, County of Los Angeles
8 criminal search warrant in which he knew he would have favor by the prejudiced and
9 biased judicial officers of the Northeast District of Superior Court of California, County
10 of Los Angeles.

11
12 **See Verified Appendix of Exhibits, Exhibit ____**. Also attached here below is a true and
13 correct copy of page one of Billy Khounthavong's federal district court criminal
14 complaint in case 13-3105M. Also, see a copy of Lying Billy's federal indictment below.

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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 JUDICIAL ABUSE OF PROCESS, 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, HED, & NEGLIGENT HED**

Case 2:13-cv-03105-DUTY Document 1 Filed 12/05/13 Page 1 of 22 Page ID #: 1

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. M-13-2394-RZ		FILED CLERK U.S. DISTRICT COURT DEC - 5 2013 CENTRAL DISTRICT OF CALIFORNIA BY _____ 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 <i>JS</i>	
	OFFICIAL TITLE Special Agent - FBI	
Sworn to before me and subscribed in my presence,		
SIGNATURE OF MAGISTRATE JUDGE Jay C. Gandhi		DATE December 5, 2013

See Federal Rules of Criminal Procedure 1 and 54
AUSA Margaret L. Carter *[Signature]* REC \$100,000 Secured Bond

①

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 JUDICIAL ABUSE OF PROCESS, 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

84. On February 21, 2023, County of Los Angeles rogue peace officer Aaron D. Contreras created a fraudulent and counterfeit Superior Court of California, County of Los Angeles probable cause determination declaration in which he stated that the Honorable Jana Seng approved his bogus PCD at approximately 1 PM, which was at a time she was on her lunch break. But it gets worse. While County of Los Angeles Sheriff's Department has its own system for entering PCDs and sending them to the court. There are no records of Aaron D. Contreras' bogus PCD. Also, the fact that Contreras alleged that his PCD was approved and that probable cause was found non-telephonically was a bald-faced lie. Probable cause is usually found at a preliminary hearing when it's non-telephonic. Additionally, a court reporter was required to transcribe Aaron D. Contreras' non-telephonic probable cause determination declaration. See California Penal Code Section 817, subdivizsion (g). Additionally, the County of Los Angeles Sheriff's Department and its rogue peace officer Aaron D. Contreras willfully, knowingly, recklessly, carelessly, maliciously, wantonly, and callously failed to file a certificate of service with Jana Seng's courtroom after rogue and lying peace officer Aaron D. Contreras falsely alleged that his bogus and forged arrest warrant was approved by judicial officer Jana Seng, as was mandatory by the California criminal statutes. See California Penal Code Section 817, subdivision (i). County of Los Angeles Sheriff's Department and rogue peace officer Aaron D. Contreras never filed a certificate of service because they knew that their probable cause determination declaration was shammed, bogus, counterfeit, false, forged, and fraudulent. See rogue peace officer Aaron D. Contreras's phony probable cause determination declaration attached hereto below and marked as Verified Appendix of Exhibits, Exhibit. See also a copy of Aaron D. Contreras's phony Superior Court of California, County of Los Angeles probable cause determination declaration below.

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 JUDICIAL ABUSE OF PROCESS, 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

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES			
PROBABLE CAUSE DETERMINATION (DECLARATION)			
Location Booked: TEM	Booking No.: 6555970	Arrest File No.: 921-02068-0588-339	
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): 472 PC	Misdemeanor <input type="checkbox"/>	Supplemental Holds/Warrants Charges:	
	Felony <input checked="" type="checkbox"/>		
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 hr 02/21/2023 1256 hr	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: I contacted the Victim, who stated she locked the garage door to her residence because she was so 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. He sustained fear for his life, believing the Suspect would grab a weapon from the garage to carry out the threat, the Victim called 9-1-1. The Victim positively identified the Suspect as the man that threatened to kill her. Based on the above, I arrested the Suspect for the indicated charge.			
<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 my 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 _____ (Signature) (Employee No.)		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)	
		(Block Stamp)	

FORM 064 Revised: 10/21/04

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 JUDICIAL ABUSE OF PROCESS, 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

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

Submit via email ONLY upon activation of the ePCD Contingency Plan

Further, the mandatory LASC CRIM 064 form states the following in the bottom left-hand corner of the mandatory form:

Submit via email ONLY upon activation of the ePCD Contingency Plan

Emailed to: emailed: email4PCD@lacourt.org

See **Verified Appendix of Exhibits, Exhibit _____**, and also attached herein below is a true and correct copy of mandatory LASC CRIM 064 mandatory judicial form for all submitted Superior Court of California, County of Los Angeles probable cause determinations.

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 JUDICIAL ABUSE OF PROCESS, 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

1 86. On February 21, 2023 Aaron D. Contreras, the County of Los Angeles Sheriff's
2 Department, in addition to violating KING AROGANT's Fourteenth Amendment Due
3 Process constitutional rights and his Article I, Section 13 constitutional rights, County of
4 Los Angeles peace officers involved with KING AROGANT's initial criminal
5 investigation knowingly, recklessly, willfully, maliciously, carelessly, wantonly, and
6 callously violated Los Angeles County Sheriff's Department electronic probable cause
7 declaration system by not completing the mandatory LASC CRIM 064 mandatory form
8 and emailing phony probable cause to: email4PCD@lacourt.org
9

10 87. Defendant George Gascon recklessly violated KING AROGANT's constitutional
11 Fourth Amendment Search and Seizure Clause civil rights by carelessly allowing rogue,
12 dishonest, and RACIST deputy district attorney Brian MARK Rosenberg to present as
13 evidence in a criminal Superior Court of California a phony, bogus, unverified,
14 uncertified, unattested, and unauthenticated Superior Court of California, County of Los
15 Angeles outdated LASC CRIM 064 form that as last revised on October 21, 2008, and
16 did not bear the seal of the Superior Court of California, in direct violation of Superior
17 Court of California County of Los Angeles local criminal rule 8-17, and California
18 Evidence Code §§ 1530, 1531, & 1532.

19 8.17 OBTAINING COURT FILES Any party seeking to introduce evidence of prior convictions, or
20 any other information contained within court files, in any proceeding must, prior to the
21 trial date, obtain certified copies only of the relevant documents from the Clerk's Office
22 where the file is located. A request for certified copies must be made a sufficient time
23 before trial so as not to delay the trial. The original files will not be sent to the trial
24 court unless the court orders so for good cause on written application. Failure to obtain the
25 documents in a timely fashion will not be good cause for a continuance. (Rule 8.17 new and
26

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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 JUDICIAL ABUSE OF PROCESS, 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 88. Aaron D. Contreras' misconduct, actions, transgressions, misdoings, and misdeeds
2 of willfully, knowingly, carelessly, maliciously, wantonly, and callously creating a phony
3 and bogus Superior Court of California, County of Los Angeles probable cause
4 determination declaration that was against the Superior Court of California, County of
5 Los Angeles' judicial policies and procedures, and Contreras' reckless actions were
6 against County of Los Angeles Sheriff's Department police policies and procedures,
7 proving by clear and convincing evidence that Superior Court of California, County of
8 Los Angeles, frivolous and unconstitutional criminal felony case **GA114055** was a foul-
9 played criminal case from the very beginning on February 21, 2023.

10
11 89. On or about February 23, 2023, rogue and dishonest peace officer detective lying
12 Billy Khounthavong willfully, knowingly, carelessly, maliciously, wantonly, wrongfully,
13 callously, and unnecessarily sent KING AROGANT'S GoPro Hero 10 action camera to
14 County of Los Angeles Sheriff's Department and Ventura County Sheriff's Office's joint
15 Fraud and Cyber Crimes Bureau's Southern California High Tech Task Force so they
16 could illegally manipulate his GoPro video recordings to make him look guilt of a crime
17 they all knew that KING AROGANT did not commit (***KING AROGANT is seen in***
18 ***Defendant George Gascón's phony LASD-created GoPro video recording GX010586***
19 ***shutting off his GoPro camera with a bare right arm while Gascón police video***
20 ***recordings show KING AROGANT wearing a long-sleeved coat***).

21
22 90. California Commission on Peace Officer Standards and Training Basic Course
23 The Workbook Series proves that Billy Khounthavong's Search Warrant is and was
24 bogus. It also proves that no County of Los Angeles peace officer had any probable cause
25 whatsoever to confiscate KING AROGANT's GoPro Camera and then request a search
26 warrant to search it. Thus, Billy Khounthavong, Brian Mark Rosenberg, and Richard

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 JUDICIAL ABUSE OF PROCESS, 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 Lewis must be immediately charged with willfully, knowingly, recklessly, and wantonly
2 violating California Government Code § 6200.

3
4 91. The California Commission on Peace Officer Standards and Training's Basic
5 Course Workbook Series proves that the County of Los Angeles Sheriff's Department
6 had no probable cause to request a search warrant. The legal document proves Billy
7 Khounthavong, Brian Mark Rosenberg, and Richard Lewis recklessly violated the
8 California Government Code § 6200 by bringing into a Superior Court of California
9 criminal courthouse and courtroom a bogus and counterfeit forged search warrant that
10 they all knew was never issued by any Pasadena Superior Court judicial officer. The legal
11 document proves that based on Billy Khounthavong and Richard Lewis' peace officer
12 standards training on search warrant policies and procedures, they knew that they were
13 willfully violating numerous California penal code statutes and Arogant Hollywood's
14 Fourth and Fourteenth Amendment constitutional rights by creating a phony search
15 warrant and then committing a federal crime by lying under oath in their falsified police
16 report that it was issued by a Pasadena Superior Court judicial officer, while of course,
17 Pasadena Superior Court has no records of ever receiving it!

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

20 Introduction to Warrant Searches, Continued
21 2-4 LD 16: Chapter 2 – Warrant Searches and Seizures
22 Benefits of obtaining a search warrant.
23

24 As a general rule, the courts have found searches and seizures to be reasonable and
25 therefore lawful when authorized by a valid warrant. The burden is on the defendant to
26

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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

1 prove the illegality of any search executed with a search warrant. Statutory grounds for a
2 search warrant Penal Code Section 1524 presents the statutory grounds for issuance of a
3 search warrant. When the property or thing... Penal Code Section was stolen or
4 embezzled. 1524(a)(1) was used as the means of committing a felony. 1524(a)(2)
5 is in the possession of any person with the intent to use it as a means of committing a
6 public offense, or in the possession of another to whom the item may have been delivered
7 for the purpose of concealing it or preventing its being discovered. 1524(a)(3) constitutes
8 evidence that tends to show a felony has been committed, or tends to show that a
9 particular person has committed a felony. 1524(a)(4) consists of evidence that tends to
10 show that sexual exploitation of a child (Penal Code 311.1), or the possession of matter
11 depicting sexual conduct of a person under the age of 18 years (Penal Code 311.11),
12 has occurred or is occurring.

13 1524(a)(5)

14
15 **See California Commission on Peace Officer Standards and Training, Basic**
16 **Course Workbook Series, Student Materials, Learning Domain 16, Search and**
17 **Seizure, Version 4.8, Revised in June 2017, Foreword by current post EXECUTIVE**
18 **DIRECTOR, MANUEL ALVAREZ, JR. at 2-4, LD 16: Chapter 2-Warrant**
19 **Searches and Seizures, found on page 35 of 176**

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

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

25
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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

1 Probable Cause to Search

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

5 Constitutional requirement of probable cause

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

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

12 **Probable cause to search**

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

23
24 **Id at LD 16: Chapter 2-Warrant Searches and Seizures, found on page 38 of 176**

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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 JUDICIAL ABUSE OF PROCESS, 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 93. On page 4 of his bogus search warrant allegedly created on February 22, 2023

2 Billy Khounthavong states the following:

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

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

9
10 Based on the above statement, there was zero probable cause for the issuance of any
11 search warrant. Just because KING AROGANT told Khounthavong that he had recorded
12 the confrontation with Jennifer Hutton-Heger did not mean that he was admitting that he
13 had done anything wrong, specifically making a criminal threat. Further, the original
14 GoPro video recording recorded on February 21, 2023, that County of Los Angeles peace
15 officers recklessly manipulated and tainted proves that Billy Khounthavong and Richard
16 Lewis knew that they did not have probable cause to request any search warrant be issued
17 to search KING AROGANT's GoPro camera. See the REAL GoPro video recording
18 GX010586 here:

19
20 <https://youtu.be/IHH9GbgJjsQ?si=IPLbYFDJ8pwjXoz>

21
22 94. On page 5 of 6 of Billy Khounthavong's February 22, 2023 bogus search warrant,
23 he stated the following:
24
25
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 JUDICIAL ABUSE OF PROCESS, 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 *It should be noted from prior law enforcement contacts with the suspect, the suspect*
2 *was well known to have the "GoPro" in his possession and made it a habit to have the*
3 *digital recorder recording.*
4

5 Oh really? What Khounthavong meant was that the County of Los Angeles Sheriff's
6 Department was well aware that KING AROGANT was recording because people
7 constantly accused him of committing crimes.
8

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

11 https://www.instagram.com/p/CQK0dL7H_aB/
12

13 See now a GoPro video recording based on a false criminal threats allegation made
14 by the white devil AROGANT was arguing within the video. The false arrest was made
15 by dirty and corrupt LASD Temple City peace officers yet again:
16

17 <https://www.instagram.com/p/CLS-Xx1HoAv/>
18

19 Here is yet another video of LASD Temple City PIGZ either harassing or arresting
20 AROGANT:

21 <https://www.instagram.com/p/CQKLE6RndAV/>
22

23
24 Thus, based on Billy Khounthavong's knowledge of KING AROGANT recording
25 himself not committing crimes, there was no probable cause for Billy Khounthavong's
26

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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 JUDICIAL ABUSE OF PROCESS, 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 bogus search warrant based on him telling the Court that KING AROGANT made it a
2 habit to record on his GoPro camera. Further, those statements alone did not constitute
3 probable cause for the issuance of a search warrant for KING AROGANT's GoPro
4 camera.

5
6 95. On page 6 of Billy Khounthavong's February 22, 2023 bogus search warrant, he
7 committed perjury, violated state and federal criminal statutes, and violated KING
8 AROGANT's civil rights by typing the following false information and statements:

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

14 **LIAR**

15
16 96. Based on Billy Khounthavong's illegal review of KING AROGANT's GoPro
17 camera video recordings before he had authored his bogus search warrant, he had already
18 reviewed all the videos recordings recorded on February 21, 2023, on KING
19 AROGANT's GoPro camera. Therefore, Billy Khounthavong knew that KING
20 AROGANT's GoPro camera's video recordings would not show KING AROGANT
21 making a criminal threat. Based on the actions of Billy Khounthavong, based on his false
22 statements made in his bogus search warrant affidavit, and based on the evidence shown
23 in the original nearly fifteen-minute video recording recorded on the early morning of
24 February 21, 2023, Billy knew that County of Los Angeles Sheriff's Department had zero
25 probable cause to search KING AROGANT's GoPro camera.
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 Therefore, Billy Khounthavong knew that KING AROGANT's GoPro camera's video
2 recordings would not show KING AROGANT making a criminal threat. Based on the
3 actions of Billy Khounthavong, based on his false statements made in his bogus search
4 warrant affidavit, and based on the evidence shown in the original nearly fifteen-minute
5 video recording recorded on the early morning of February 21, 2023, Billy knew that
6 County of Los Angeles Sheriff's Department had zero probable cause to believe that
7 KING AROGANT had made a criminal threat on February 21, 2023, and Khounthavong
8 and Richard Lewis should have released KING AROGANT, returned his Samsung
9 Galaxy S21 mobile phone, and returned KING AROGANT's GoPro camera. Instead, the
10 biased and racist County of Los Angeles Temple City police sub-station peace officers
11 illegally confiscated KING AROGANT'S GoPro camera and recklessly, wantonly,
12 knowingly, callously, and willfully sent it to the County of Los Angeles Sheriff's
13 Department's Fraud and Cyber Crimes Bureau's Southern California High Tech Task
14 Force so peace officers there could manipulate KING AROGANT's GoPro camera, and
15 Billy S. Khounthavong and Richard Lewis recklessly disposed of KING AROGANT's
16 mobile phone because they knew it contained on it exculpatory audio recordings and text
17 messages that would have exonerated KING AROGANT, in furtherance of Los Angeles
18 County's conspiracy to frame Hollywood for a violent and serious crime it knew he did
19 not commit.

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

23
24 **Probable cause to search vs. probable cause to arrest**

25
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 JUDICIAL ABUSE OF PROCESS, 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 Probable cause to search differs in content, but not in degree of certainty, from
2 probable cause to arrest.

3 Search Warrants Arrest Warrants

4 Peace officers must articulate probable cause that: a crime has been committed,
5 and evidence concerning the crime or the identity of the perpetrator is located at the place
6 to be searched. Peace officers must articulate probable cause that: a crime has been
7 committed, and the individual to be arrested committed that crime.
8

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

10
11 ***The point of the Fourth Amendment, which often is not grasped by zealous officers,
12 is not that it denies law enforcement the support of usual inferences which reasonable
13 men draw inferences which reasonable men draw from evidence. Its protection consists
14 in requiring that these inferences be drawn by a neutral and detached magistrate
15 instead of being judged by the officer engaged in the often competitive enterprise of
16 ferreting out crime.***

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

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

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

23
24 See also *Dunaway v. New York*, 442 U.S. 200, 99 S.Ct. 2248, 60 L.Ed.2d 824 (1979)
25 at 212 quoting *Henry v. United States*, *supra*, at 101
26

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28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
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DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

1 98. Lying Billy could not articulate probable cause that KING AROGANT'S GoPro
2 video recordings would show him committing a felony. The statements made by KING
3 AROGANT to Billy Khounthavong pointed to KING AROGANT'S innocence, not guilt.
4

5 99. Thus, pursuant to United States Supreme Court cases, California penal codes
6 statutes, and the California Commission on Peace Officer Standards and Training manual
7 in Chapter 2-Warrant Searches and Seizures, found on page 39 of 176. Billy
8 Khounthavong did not have probable cause to confiscate KING AROGANT'S GoPro
9 camera.
10

11 100. Thus, pursuant to United States Supreme Court cases, California Penal Code
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 KING
15 AROGANT'S GoPro camera would show him committing a felony.
16

17 101. Thus, pursuant to United States Supreme Court cases, California penal codes
18 statutes, and the California Commission on Peace Officer Standards and Training Manual
19 in Chapter 2-Warrant Searches and Seizures, found on page 39 of 176. Billy
20 Khounthavong did not have probable cause to articulate and believe that KING
21 AROGANT'S GoPro camera would show him committing a felony based on the false and
22 perjured statements he typed on his bogus search warrant.
23

24 102. Thus, pursuant to United States Supreme Court cases, California penal codes
25 statutes, and the California Commission on Peace Officer Standards and Training manual
26 in Chapter 2-Warrant Searches and Seizures, found on page 39 of 176. Billy
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
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AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, &
NEGLIGENT IIED**

1 Khounthavong did not have probable cause to articulate and believe that KING
2 AROGANT'S GoPro camera would show him committing a felony.

3
4 103. Thus, pursuant to United States Supreme Court cases, California penal codes
5 statutes, and the California Commission on Peace Officer Standards and Training manual
6 in Chapter 2-Warrant Searches and Seizures, found on page 39 of 176. Billy
7 Khounthavong's bogus search warrant affidavit and illegal confiscation of KING
8 AROGANT'S GoPro camera were based upon nothing more than common rumor or
9 report, and suspicion.

10
11 104. Billy Khounthavong and Richard Lewis wantonly and recklessly violated their
12 oath of office pursuant to 11 CCR § 1013, Code of Ethics by keeping KING AROGANT
13 in jail and then authoring a bogus and fabricated search warrant affidavit while they both
14 knew that KING AROGANT's GoPro camera did not show him committing a felony,
15 and they knew at the time of writing false statements in their illegal, falsified, and
16 unconstitutional police report that they had zero probable cause to believe that there was
17 any inculpatory evidence, direct evidence, or circumstantial evidence to support their
18 false statements that KING AROGANT's GoPro camera would show him committing a
19 felony. For upon which no reasonable inferences could have been drawn that KING
20 AROGANT'S GoPro camera would show him making a criminal threat.

21
22 105. Based upon Billy Khounthavong and Richard Lewis' POST TRAINING OF
23 2-10 LD 16: Chapter 2-Warrant Searches and Seizures, found on page 39 of 176. They
24 both knew that their actions violated their oath of office and Los Angeles County
25 Sheriff's Department search warrant procedures and policies.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 106. Billy Khounthavong and Richard Lewis wantonly and recklessly violated their
2 oath of office pursuant to 11 CCR § 1013, Code of Ethics by keeping KING AROGANT
3 in jail and then authoring a bogus and fabricated search warrant affidavit while they both
4 knew that KING AROGANT'S GoPro camera did not show him committing a felony,
5 and they knew after the time of writing false statements in their illegal and
6 unconstitutional police report that they had zero probable cause to believe that there was
7 any inculpatory evidence, direct evidence, or circumstantial evidence to support their
8 false statements that KING AROGANT's GoPro camera would show him committing a
9 felony. For upon which no reasonable inferences could have been drawn that KING
10 AROGANT'S GoPro camera would show him making a criminal threat. Based upon
11 Billy Khounthavong and Richard Lewis' POST TRAINING OF 2-10 LD 16: Chapter 2-
12 Warrant Searches and Seizures, found on page 39 of 176. They both knew that their
13 actions violated their oath of office and County of Los Angeles Sheriff's Department
14 search warrant procedures and policies.

15
16 107. Defendants Gascón and GoPro Manipulator willfully, knowingly, maliciously,
17 recklessly, wantonly, and callously violated the United States Constitution and KING
18 AROGANT's Fourth Amendment constitutional civil rights by seizing, searching,
19 copying, and taking possession of KING AROGANT's GoPro video recordings and
20 GoPro camera without having probable cause and without having a valid Superior Court
21 of California, County of Los Angeles search warrant. Further, Defendant Gascón
22 willfully, knowingly, maliciously, recklessly, wantonly, and callously violated the United
23 States Constitution and KING AROGANT's Fourth Amendment Search and Seizure
24 Clause constitutional civil rights by recklessly allowing his rogue, biased, and racist
25 deputy district attorney Brian MARK Rosenberg to recklessly present to as evidence in a
26 criminal Superior Court of California a phony, bogus, unverified, uncertified, unattested,

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

1 and unauthenticated Superior Court of California, County of Los Angeles search warrant
2 that did not bear the seal of the Superior Court of California, in direct violation of
3 Superior Court of California County of Los Angeles local criminal rule 8-17, and
4 California Evidence Code §§ 1530, 1531, & 1532.

5
6 108. Pursuant to L16 Chapter 2, page 40 of 176, *supra*, Billy Khounthavong, and
7 Richard Lewis knew shortly after KING AROGANT was arrested that there was no
8 direct or circumstantial evidence that KING AROGANT's GoPro camera would show
9 him committing evidence. Khounthavong and Lewis believed the opposite that KING
10 AROGANT's GoPro camera would prove that he did not commit a crime. Proof of this is
11 the fact that while County of Los Angeles Sheriff's Department's Fraud and Cyber
12 Crimes Bureau's Southern California High-Tech Task Force's job description, job
13 assignments, and job duties given to them by the State of California Department of
14 Justice does not and did not at all authorize them under California state law to analyze,
15 copy, review, extract, and manipulate video recordings from a GoPro video camera that
16 was confiscated during a bogus criminal threats investigation. County of Los Angeles
17 peace officers illegally, unlawfully, and unconstitutionally copied, searched, and took
18 possession of KING AROGANT's GoPro camera on behalf of corrupt and rogue peace
19 officers Billy Khounthavong, Richard Lewis, and the longstanding tainted and corrupt
20 County of Los Angeles Sheriff's Department Temple City police station. See below:
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22
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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 JUDICIAL ABUSE OF PROCESS, 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 <https://oag.ca.gov/ecrime/httap>

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11 **High Technology Theft Apprehension and**

12 **Prosecution (HTTAP) Program**

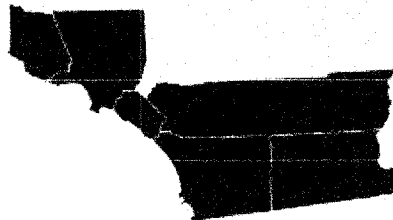
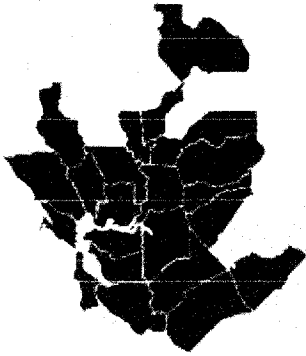
- 13 1. [Home](#)
- 14 2. [eCrime](#)
- 15 3. High Technology Theft Apprehension and Prosecution (HTTAP) P...

16 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.

17 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.

21 **The five regional Task Forces**

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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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. 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)

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Other Regional Task Forces

1. Los Angeles Electronic Crimes Task Force (LAECTF)
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, spearfishing, 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

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PLAINTIFF KING AROGANT 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.

109. The mission of the High Technology Theft Apprehension and Prosecution (HTTAP) Program is not to copy, search, manipulate, and copy GoPro video recordings related to a criminal threats investigation. Further, the evidence shown on KING AROGANT'S Instagram profile and YouTube account proves that Billy Khounthavong and Richard Lewis' only purpose in sending KING AROGANT'S GoPro camera to the Southern California High Tech Task Force Response Team [SCHTTF] was so that they and County of Los Sheriff's Department could manipulate KING AROGANT'S GoPro video recordings to frame KING AROGANT by making him appear guilty. Just as Billy Khounthavong, Richard Lewis, County of Los Angeles Sheriff's Department Temple City police station, and Brian MARK Rosenberg did at the preliminary hearing by misleading the court by showing it an altered and edited GoPro video recording frame sequence of KING AROGANT shutting off his GoPro camera as he reentered Jennifer Hutton-Heger's home. Lying Billy testified that he saw KING AROGANT shutting off his GoPro camera, which resulted in a miscarriage of justice as KING AROGANT was held to answer for a violent and serious felony offense that he never committed. Billy Khounthavong and Richard Lewis did not have the video expertise and knowledge to manipulate, separate, and edit KING AROGANT'S GoPro video recordings. Nevertheless, the Southern California High Tech Task Force [SCHTTF] did. Peace officers working for SCHTTF also willfully, knowingly, maliciously, recklessly, callously, and wantonly violated California Government Code § 6200. KING

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1 AROGANT will pursue efforts to decertify and criminally charge them all.

2
3 110. Rogue and dishonest County of Los Angeles peace officers Billy Khounthavong
4 and Richard Lewis knew they had zero reasonable inferences for which they could have
5 drawn conclusions from facts that KING AROGANT'S GoPro camera would show him
6 committing a felony. Thus, their actions were unlawful and willfully, recklessly, and
7 wantonly infringed upon KING AROGANT'S Fourth Amendment Search and Seizure
8 Clause constitutional rights and their illegal search and seizure infringed upon KING
9 AROGANT'S Fourteenth Amendment Due Process Clause constitutional
10 rights. *Supra, Henry v. United States* at 101, as their actions resulted in phony LASD-
11 created GoPro video recordings being presented and admitted as evidence to frame KING
12 AROGANT in a Superior Court of California criminal courthouse.

13
14 111. Rogue and dishonest County of Los Angeles peace officers Billy Khounthavong
15 and Richard Lewis' fabricated February 22, 2023 search affidavit not only recklessly,
16 wantonly, and willfully violated KING AROGANT'S constitutional civil rights, but their
17 actions also recklessly and wantonly violated County of Los Angeles Sheriff's
18 Department search warrant policies and procedures, and based on their training in
19 California Commission on Peace Officer Standards and Training, Basic Course
20 Workbook Series Chapters 1 and 2, Lying Billy and Richard Lewis knew that what they
21 were doing in KING AROGANT's shoddy and corrupt criminal threats investigation was
22 wrong, illegal, and unconstitutional.

23
24 112. Rogue and dishonest County of Los Angeles peace officers Billy Khounthavong
25 and Richard Lewis' bogus search warrant was not executed according to California Penal
26 Code §§ 1523-1541 because they both knew there was zero evidence to support any

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 probable cause that KING AROGANT's GoPro camera would show him
2 committing a felony. Further, based upon their training in the POST manual and the real
3 GoPro video recording witnessed by over one hundred or more County of Los Angeles
4 peace officers and attorneys receiving the video download on November 28, 2023, the
5 bogus search warrant was not supported by any probable cause whatsoever.

6
7 113. Billy Khounthavong and Richard Lewis' false statements that KING AROGANT's
8 GoPro camera would show him committing a felony did not constitute grounds for the
9 execution of a search on KING AROGANT'S GoPro camera because based on the
10 original GoPro video recording uploaded to KING AROGANT'S Instagram channel it is
11 very clear that they both had already reviewed KING AROGANT's GoPro camera
12 without a search warrant prior to ever saying in their fabricated police report that they
13 had obtained a search warrant. Based on this illegal search. Before rogue and dishonest
14 peace officers Billy Khounthavong and Richard Lewis requested a search warrant and
15 authored a phony search warrant affidavit, rogue peace officers Lying Billy and Richard
16 Lews had both determined that KING AROGANT'S original GoPro video recordings
17 would exonerate him, and that was when they decided to recklessly and willfully send
18 KINGAROGANT'S exculpatory original video recordings to County of Los Angeles
19 Sheriff's Department Fraud and Cyber Crimes Bureau's Southern California High Tech
20 Task Force [**Which is jointly operated with Ventura County Sheriff's Office**] to
21 manipulate the original GoPro video recordings and frame KING AROGANT by
22 recklessly creating a phony artificial intelligent GoPro video recording (GX010586) of
23 KING AROGANT shutting off his GoPro camera by finding a previously recorded video
24 frame sequence of KING AROGANT shutting off his GoPro camera before February 21,
25 2023, and then pasting this same previously recorded video frame sequence at the end of
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 JUDICIAL ABUSE OF PROCESS, 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 separated altered GoPro video GX010586, which, before the County of Los Angeles
2 Sheriff's Department Fraud and Cyber Crimes Bureau's Southern California High Tech
3 Task Force peace officers' willful, reckless, wanton, malicious, careless, and callous
4 alteration, was one continuous and uninterrupted nearly seventeen-minute GoPro video
5 recording. County of Los Angeles Sheriff's Department, Defendant George Gascón (SBN
6 # 182345), Defendant GoPro Manipulator, Brian MARK Rosenberg (SBN # 291501),
7 and Victor Manuel Rodriguez (SBN # 156150) evidence of reckless, willful, malicious,
8 wanton, and callous fabrication and tampering of evidence is proven by clear and
9 convincing evidence easily by two facts.

10
11 114. Janis Eve Johnson (SBN # 175280), Brian MARK Rosenberg (SBN # 291501),
12 Victor Manuel Rodriguez (SBN # 156150), and numerous other County of Los Angeles
13 criminal prosecutors have all willfully, recklessly, wantonly maliciously, carelessly, and
14 callously violated KING AROGANT'S *Brady rights*, U.S.C.A. Const. Amend XIV Due
15 Process Clause constitutional civil rights, California constitutional rights County of Los
16 Angeles District Attorney's Office Discovery Compliance System Manual, County of
17 Los Angeles District Attorney's Office Legal Policies Manual: Chapter 14: Disclosure of
18 Exculpatory and Impeachment Information, California Constitution, Article I, § 7, and
19 California Penal Code § 1054, and State Bar of California Rules of Professional Conduct
20 Rule 3.8 by intentionally and recklessly failing to turn over impeaching phony GoPro
21 video recordings GX010586 and GX010587 between February 24, 2023, and October 31,
22 2024 (twenty consecutive months) by outright refusing to turn these phony GoPro video
23 recordings over despite numerous requests in writing, in court motions, during telephone
24 conversations, during facsimile transmissions, through electronic mailing, and by
25 recklessly showing and admitting these phony impeaching LASD-created GoPro video
26 recordings GX010586 and GX010587 into a State of California Criminal Superior Court

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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1 on April 4, 2023, April 5, 2023, and February 2, 2024, without first providing KING
2 AROGANT or his investigators Carlos Anthony Jackson and Joel Wyenn and also court-
3 appointed co-counsel Neil Opdahl with a copy before presenting these phony impeaching
4 video recordings to the State of California Alhambra Superior Court while the original
5 GoPro video recordings were in Gascón and MARK Rosenberg's physical possession
6 and then were presented to a State of California Superior Court without any evidence that
7 these phony LASD-created GoPro videos recordings GX010586 and GX010587 were
8 ever copied from KING AROGANT's original GoPro video recordings that were kept in
9 the possession of both Billy S. Kohunthavong and Los Angeles County Sheriff's
10 Department Southern California High Tech Task Force, which was a direct violation of
11 California Evidence Code § 1522.

12
13 115. Defendant Leo Ka Fong Lo, Defendant George Gascón, Victor Manuel Rodriguez,
14 and Brian MARK Rosenberg NEVER TURNED OVER PLAYABLE COPIES OF
15 ORIGINAL GOPRO VIDEO RECORDINGS NOT EVEN TO LYING AND RACIST
16 EXPERT WITNESS THOMAS LEO GUZMAN-SANCHEZ, who was hired to compare
17 real GoPro video recordings to phony impeaching GoPro video recordings played and
18 presented at and into Superior Court of California, County of Los Angeles, Alhambra
19 Superior Court, Department 1 on April 4, 2023, April 5, 2023, and February 2, 2024.

20
21 116. Defendant Leo Ka Fong Lo, Defendant George Gascón, Victor Manuel Rodriguez,
22 and Brian MARK Rosenberg NEVER TURNED OVER PHONY AND IMPEACHING
23 GOPRO VIDEO RECORDINGS GX010586 AND GX010587 NOT EVEN TO LYING
24 AND RACIST EXPERT WITNESS THOMAS LEO GUZMAN-SANCHEZ, who was
25 hired to compare real GoPro video recordings to phony impeaching GoPro video
26 recordings played and presented at and into Superior Court of California, County of Los

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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NEGLIGENT IIED**

1 Angeles, Alhambra Superior Court, Department 1 on April 4, 2023, April 5, 2023, and
2 February 2, 2024.

3
4 117. The still images taken from KING AROGANT'S real GoPro video recordings
5 depicting him wearing a long-sleeved coat and his GoPro camera and chest harness,
6 prove by clear and convincing evidence that the County of Los Angeles Sheriff's
7 Department, County of Los Angeles District Attorney's Office, Defendant GoPro
8 Manipulator, Defendant George Gascón, Victor Manuel Rodriguez, Sheriff Robert Luna,
9 RACIST Brian MARK Rosenberg, and numerous other named and unnamed County of
10 Los Angeles employees recklessly, willfully, knowingly, carelessly, maliciously,
11 wantonly, and callously violated California Government Code § 6200 by tampering with
12 evidence and presenting false evidence into a criminal Superior Court of California
13 courthouse by showing it phony LASD-created GOPRO video recordings that falsely
14 depicted KING AROGANT shutting on his GoPro camera with a bare right arm while he
15 was wearing dark-colored shorts and a tank top (GX010586), and falsely depicted KING
16 AROGANT walking to Jennifer Hutton Heger's front door yet never been seen standing
17 in her mirror like what is shown and depicted in real GoPro video recordings
18 (GX010587)

19 See it here again:

20 <https://youtu.be/IHH9GbgJjsQ?si=iCiP6qHMt04aDeq3>

21
22
23 The California Commission on Peace Officer Standards and Training's Basic Course
24 Workbook Series provides:

25
26 Execution of a Search Warrant, Continued

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 JUDICIAL ABUSE OF PROCESS, 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 LD 16: Chapter 2 – Warrant Searches and Seizures 2-15

2
3 Time limit for service Penal Code Section 1534 states that the search warrant shall be
4 executed and returned within 10 days from issuance. The 10-day time limit means that
5 peace officers have 10 days within which to execute the warrant, beginning with the day
6 after the warrant is issued and running until midnight of the 10th day, with no exceptions
7 for weekends or holidays.

8
9 NOTE: It is a felony for a peace officer to willfully disclose the existence
10 of a search warrant, prior to its execution, for the purpose of preventing the search or
11 seizure. (Penal Code Section 168) Failure to make a timely execution.

12
13 If the 10-day period has expired, peace officers must either:
14 obtain a new warrant resubmit the expired warrant so it may be reissued and revalidated

15
16 Failure to make a timely return

17 The return of the warrant means returning the warrant and a written inventory
18 of the property taken to the magistrate (PC 1537). The rule for return of the warrant is
19 slightly different than for execution. If the 10th day falls on a weekend or holiday, then
20 peace officers are entitled to postpone returning the warrant until the next business day.
21 A late return will not normally invalidate the warrant or result in suppression, particularly
22 if it happens unintentionally, unless the defendant can show prejudice.

23
24 Time of service

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

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 ***Id.* at LD 16: Chapter 2-Warrant Searches and Seizures 2-15, found on page 46 of**
2 **176**

3
4 118. Rogue and dishonest County of Los Angeles peace officers Billy Khounthavong
5 and Richard Lewis never documented in their original County of Los Angeles fabricated
6 supplemental police report that they served a copy of their bogus search warrant upon
7 KING AROGANT. Nor in Lying Billy and Richard Lewis numerous supplemental and
8 follow-up police reports did they mention that they had served a copy of their bogus
9 search warrant upon KING AROGANT. Yet on or about September 9, 2023, Lying Billy
10 alleged on a forged search warrant return that he had served a copy of his bogus search
11 warrant upon KING AROGANT on February 23, 2023. LIAR. On February 23, 2023,
12 KING AROGANT was transported from County of Los Angeles Sheriff's Department
13 Temple City to Superior Court of California, County of Los Angeles, Alhambra Superior
14 Court at 7:30 AM Pacific Standard Time. KING AROGANT was not even in the
15 building to be served, as Billy Khounthavong falsely alleged on his phony and bogus
16 search warrant return that he attempted to file with the Pasadena Superior Court in
17 September 2023. KING AROGANT was never served a copy of Lying Billy and Richard
18 Lewis' bogus, phony, and counterfeit search warrant. The fact that Billy S.
19 Khounthavong attempted to file a search warrant return seven months after the fact
20 proves that it was never issued.

21 119. KING AROGANT was prejudiced by Defendant GoPro Manipulator and Defendant
22 Gascón because he was never served a copy of the search warrant, and this made it much
23 harder for him to defend against the bogus search warrant used to present phony LASD-
24 created GoPro video recordings GX010586 and GX010587. Also, since the search
25 warrant was never served upon KING AROGANT when it could have been. The
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 JUDICIAL ABUSE OF PROCESS, 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 execution of the alleged mysterious search warrant was void and invalidated. Billy
2 Khounthavong and Richard Lewis willfully, knowingly, carelessly, recklessly,
3 maliciously, and wantonly violated their California Commission on Peace Officer
4 Standards and Training search warrant policies and procedures they learned while in
5 training with POST. KING AROGANT's Fourth Amendment and Fourteenth
6 Amendment constitutional civil rights were violated by Defendants GoPro Manipulator
7 and Gascón because Billy Khounthavong and Richard Lewis attempted to return by
8 attempting to file in the Superior Court of California, County of Los Angeles, Pasadena
9 Superior Court a forged a search warrant return seven months later (**no search warrant
10 return was filed between February 22, 2023 and September 6, 2023**). Lying Billy,
11 Richard Lewis, Leo Ka Fong Lo, and George Gascón's intentional non-service of their
12 bogus search warrant recklessly and wantonly violated KING AROGANT'S Fourth
13 Amendment Search and Seizure Clause and Fourteenth Amendment Due Process Clause
14 constitutional rights.

15
16 **B. DEFENDANT GEORGE GASCON, DEFENDANT LEO KA FONG LO, &**
17 **NUMEROUS COUNTY OF LOS ANGELES EMPLOYEES AND**
18 **ATTORNEYS WORKED OVERTIME TO FRAME KING AROGANT IN**
19 **SUPERIOR COURT**

20
21 120. At the rigged and unconstitutional preliminary hearing that commenced on April 4,
22 2023, and concluded on April 5, 2023, Lying Billy Khounthavong violated POST
23 training and policies, County of Los Angeles policies and procedures, and of course
24 California Government Code § 6200 by testifying falsely that KING AROGANT shut off
25 his GoPro camera for seven minutes on February 21, 2023, after he had presented to the
26 court tainted and manipulated LASD-created GoPro video recordings GX010586 &

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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1 GX010587 based upon a bogus never issued search warrant.

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

15
16 122. At the preliminary hearing on April 5, 2023, Billy Khounthavong testified almost
17 verbatim to the following:

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

20 At the preliminary hearing County of Los Angeles Sheriff's Department peace officers
21 and Billy Khounthavong admitted that they framed KING 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
25 123. At the preliminary hearing on April 5, 2023, Lying County of Los Angeles peace
26 officer Billy Khounthavong admitted that he framed KING AROGANT by instructing

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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1 County of Los Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's
2 Southern California High Tech Task Force rogue peace officers to search illegally,
3 access and copy KING AROGANT's GoPro camera video recordings recorded before
4 February 21, 2023, while Southern California High Tech Task Force was a law
5 enforcement bureau whose job duties did not include reviewing video footage obtained in
6 a criminal threats investigation. Billy Khounthavong and Richard Lewis knew that their
7 bogus search warrant did not authorize them to obtain access to KING AROGANT'S
8 GoPro video recordings recorded on February 20, 2023. Thus, Billy Khounthavong,
9 Richard Lewis, Leo Ka Fong Lo, George Gascón, County of Los Angeles Sheriff's
10 Department Fraud and Cyber Crimes Bureau's Southern California High Tech Task
11 Force and numerous other County of Los Angeles employees' illegal acts, actions,
12 misconduct, misdeeds, and transgressions of accessing, searching, copying, editing, and
13 altering KING AROGANT'S GoPro video recordings recorded prior to February 21,
14 2023, willfully, knowingly, carelessly, recklessly, maliciously, callously, and wantonly
15 violated California Commission on Peace Officer Standards and Training procedures and
16 policies, the United States Constitution, and KING AROGANT'S Fourth Amendment
17 Search and Seizure constitutional civil rights, and his Fourteenth Amendment Due
18 Process Clause constitutional civil rights. Since Billy Khounthavong, Richard
19 Lewis, Richard Lewis, Leo Ka Fong Lo, George Gascón, County of Los Angeles
20 Sheriff's Department Fraud and Cyber Crimes Bureau's Southern California High Tech
21 Task Force, and numerous other County of Los Angeles employees created a GoPro
22 video recording showing KING AROGANT shutting off his GoPro camera just before he
23 reentered Jennifer Hutton-Heger's home on the fateful and unfortunate morning of
24 February 21, 2023, and because their bogus video recordings were knowingly false and
25 presented to a Superior Court of California, they all recklessly, maliciously, and wantonly
26 violated California Government Code § 6200 because their actions were knowingly false

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 JUDICIAL ABUSE OF PROCESS, 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 and intentional, and the access of KING AROGANT'S GOPRO video recordings
2 recorded prior to February 21, 2023 was outside of the scope of Billy Khounthavong's
3 bogus search warrant. *Id.* at page 1
4

5 124. Between February 21, 2023, and October 31, 2024, Defendants Leo Ka Fong Lo
6 and George Gascón willfully, knowingly, recklessly, wantonly, carelessly, maliciously, and
7 callously committed reckless under color of law FRAUD by recklessly mispresenting to, lying
8 to, falsely representing to, and fabricating lies and creating false evidence to a Superior Court of
9 California criminal courthouse that KING AROGANT shut off his GoPro camera between 9:59
10 AM and 10:06 AM on February 21, 2023, by them recklessly presenting to a Superior Court of
11 California, County of Los Angeles, Alhambra Superior Court felony criminal courtroom phony
12 LASD-created and manipulated unoriginal GoPro video recordings GX010586 and GX010587
13 that depict KING AROGANT shutting off his GoPro camera wearing different clothing than he
14 had on February 21, 2023, which was reckless under color of law FRAUD done by Defendants
15 Gascon and GoPro Manipulator by them using, by them doing, by them executing, by them
16 manipulating, by them employing, by them directing, and by them otherwise engaging in
17 illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, and
18 corruption so that Defendants Gascón and GoPro Manipulator could gain an unfair, unjust,
19 illegal, unlawful, and unconstitutional advantage over Plaintiff KING AROGANT.
20

21 125. Between February 21, 2023 and October 31, 2024, Defendants Leo Ka Fong Lo
22 and George Gascón willfully, knowingly, recklessly, wantonly, carelessly, maliciously, and
23 callously committed reckless under color of law FRAUD by tricking, fooling, manipulating,
24 deceiving, failing to tell, and failing to inform a Superior Court of California courthouse that
25 they were fabricating lies and creating evidence that KING AROGANT shut off his GoPro
26 camera between 9:59 AM and 10:06 AM on February 21, 2023, by them recklessly presenting to
27

28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
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1 a Superior Court of California, County of Los Angeles, Alhambra Superior Court felony
2 criminal courtroom phony LASD-created and manipulated unoriginal GoPro video recordings
3 GX010586 and GX010587 that depict KING AROGANT shutting off his GoPro camera
4 wearing different clothing than he had on February 21, 2023, which was reckless under color of
5 law FRAUD done by Defendants Gascon and GoPro Manipulator by them using, by them
6 doing, by them executing, by them manipulating, by them employing, by them directing, and by
7 them otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
8 conspiracies, concealment, and corruption so that Defendants Gascón and GoPro Manipulator
9 could gain an unfair, unjust, illegal, unlawful, and unconstitutional advantage over Plaintiff
10 KING AROGANT.

11
12 126. Between February 21, 2023, and October 31, 2024, Defendants Leo Ka Fong Lo
13 and George Gascón willfully, knowingly, recklessly, wantonly, carelessly, maliciously, and
14 callously committed reckless under color of law FRAUD by tricking, fooling, manipulating,
15 deceiving, failing to tell, and failing to inform a Superior Court of California courthouse that
16 they illegally seized, searched, copied, manipulated, edited, and accessed KING AROGANT's
17 original GoPro Hero 10 camera based on a phony, bogus, and never issued Superior Court of
18 California, County of Los Angeles search warrant, which was reckless under color of law
19 FRAUD done by Defendants Gascon and GoPro Manipulator by them using, by them doing, by
20 them executing, by them manipulating, by them employing, by them directing, and by them
21 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
22 conspiracies, concealment, and corruption so that Defendants Gascón and GoPro Manipulator
23 could gain an unfair, unjust, illegal, unlawful, and unconstitutional advantage over Plaintiff
24 KING AROGANT.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 127. Between February 21, 2023, and October 31, 2024, Defendants Leo Ka Fong Lo
2 and George Gascón willfully, knowingly, recklessly, wantonly, carelessly, maliciously, and
3 callously committed reckless under color of law fraud by tricking, fooling, manipulating,
4 deceiving, failing to tell, and failing to inform Carlos Anthony Jackson, Joel Wyenn, Thomas
5 Leo Sanchez, Neil Opdahl (SBN # 277596), and KING AROGANT that they were fabricating
6 lies and creating evidence that KING AROGANT shut off his GoPro camera between 9:59 AM
7 and 10:06 AM on February 21, 2023, and then recklessly presenting this false evidence into a
8 Superior Court of California, County of Los Angeles, Alhambra Superior Court felony criminal
9 courtroom in the electronic media format of Axon Enterprises Inc.'s evidence.com uploaded
10 phony LASD-created and manipulated unoriginal GoPro video recordings GX010586 and
11 GX010587 that depict KING AROGANT shutting off his GoPro camera wearing different
12 clothing than he had on February 21, 2023, which was recklessly done by Defendants Gascon
13 and GoPro Manipulator by them using, by them doing, by them executing, by them
14 manipulating, by them employing, by them directing, and by them otherwise engaging in
15 illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, and
16 corruption so that Defendants could gain an unfair, unjust, illegal, unlawful, and unconstitutional
17 advantage over Plaintiff KING AROGANT.

18
19 128. Between February 21, 2023, and October 31, 2024, Defendants Leo Ka Fong Lo
20 and George Gascón willfully, knowingly, recklessly, wantonly, carelessly, maliciously, and
21 callously committed reckless under color of law FRAUD by tricking, fooling, manipulating,
22 deceiving, failing to tell, and failing to inform a Superior Court of California courthouse that
23 they illegally seized, searched, copied, manipulated, edited, and accessed KING AROGANT's
24 original GoPro Hero 10 camera based on a phony, bogus, and never issued Superior Court of
25 California, County of Los Angeles search warrant, which was reckless under color of law
26 FRAUD done by Defendants Gascon and GoPro Manipulator by them using, by them doing, by

27
28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
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DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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1 them executing, by them manipulating, by them employing, by them directing, and by them
2 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
3 conspiracies, concealment, and corruption so that Defendants Gascón and GoPro Manipulator
4 could gain an unfair, unjust, illegal, unlawful, and unconstitutional advantage over Plaintiff
5 KING AROGANT.

6
7 129. Between February 21, 2023, and October 31, 2024, Defendants Leo Ka Fong Lo
8 and George Gascón willfully, knowingly, recklessly, wantonly, carelessly, maliciously, and
9 callously committed reckless under color of law fraud by tricking, fooling, manipulating,
10 deceiving, failing to tell, and failing to inform Carlos Anthony Jackson, Joel Wyenn, Thomas
11 Leo Sanchez, Neil Opdahl (SBN # 277596), and KING AROGANT that they were fabricating
12 lies and creating evidence that KING AROGANT shut off his GoPro camera between 9:59 AM
13 and 10:06 AM on February 21, 2023, and then recklessly presenting this false evidence into a
14 Superior Court of California, County of Los Angeles, Alhambra Superior Court felony criminal
15 courtroom in the electronic media format of Axon Enterprises Inc.'s evidence.com uploaded
16 phony LASD-created and manipulated unoriginal GoPro video recordings GX010586 and
17 GX010587 that depict KING AROGANT shutting off his GoPro camera wearing different
18 clothing than he had on February 21, 2023, which was recklessly done by Defendants Gascon
19 and GoPro Manipulator by them using, by them doing, by them executing, by them
20 manipulating, by them employing, by them directing, and by them otherwise engaging in
21 illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, and
22 corruption so that Defendants could gain an unfair, unjust, illegal, unlawful, and unconstitutional
23 advantage over Plaintiff KING AROGANT.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 130. Between February 21, 2023, and October 31, 2024, Defendants Leo Ka Fong Lo
2 and George Gascón willfully, knowingly, recklessly, wantonly, carelessly, maliciously, and
3 callously committed reckless under color of law fraud by concealing from and failing to disclose
4 to Carlos Anthony Jackson, Joel Wyenn, Thomas Leo Sanchez, Neil Opdahl (SBN # 277596),
5 and KING AROGANT fabricated and falsely created evidence in the form of phony LASD-
6 created GoPro video recordings GX010586 and GX010587 that falsely depicted and displayed
7 KING AROGANT shutting off his GoPro camera between 9:59 AM and 10:06 AM on February
8 21, 2023, and then recklessly presenting this false evidence into a Superior Court of California,
9 County of Los Angeles, Alhambra Superior Court felony criminal courtroom in the electronic
10 media format of Axon Enterprises Inc.'s evidence.com uploaded phony LASD-created and
11 manipulated unoriginal GoPro video recordings GX010586 and GX010587 without disclosing
12 phony GoPro video recordings that depict KING AROGANT shutting off his GoPro camera
13 wearing different clothing than he had on February 21, 2023, which was recklessly done by
14 Defendants Gascon and GoPro Manipulator by them using, by them doing, by them executing,
15 by them manipulating, by them employing, by them directing, and by them otherwise engaging
16 in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment,
17 and corruption so that Defendants could gain an unfair, unjust, illegal, unlawful, and
18 unconstitutional advantage over Plaintiff KING AROGANT.

19
20 131. Between February 21, 2023, and October 31, 2024, Defendant George Gascón
21 willfully, knowingly, recklessly, wantonly, carelessly, maliciously, and callously committed
22 reckless under color of law fraud by tricking, fooling, manipulating, deceiving, failing to tell,
23 and failing to inform a Superior Court of California courthouse that he had illegally detained and
24 falsely imprisoned KING AROGANT since February 21, 2023 based on a phony, bogus, and
25 never issued Superior Court of California, County of Los Angeles probable cause determination
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 JUDICIAL ABUSE OF PROCESS, 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 declaration, which was reckless under color of law FRAUD done by Defendant Gascon by him
2 using, by him doing, by him executing, by him manipulating, by him employing, by him
3 directing, and by him otherwise engaging in illusory and manipulated illegal acts of deceit,
4 deception, fraud, conspiracies, concealment, and corruption so that Defendant Gascón could
5 gain an unfair, unjust, illegal, unlawful, and unconstitutional advantage over Plaintiff KING
6 AROGANT.

7
8 132. Rogue and dishonest County of Los Angeles peace officers Billy Khounthavong
9 and Richard Lewis knew that they had no probable cause to continue to imprison KING
10 AROGANT on February 21, 2023, after watching the original GoPro video recording;
11 they should have done the right thing and released KING AROGANT immediately.
12 Instead, the evil-minded and corrupt Caucasian and brown devils framed KING
13 AROGANT by willfully, knowingly, recklessly, maliciously, wantonly, and callously
14 sending his exculpatory GoPro camera and exculpatory GoPro video recordings to
15 County of Los Angeles Sheriff's Department Fraud and Cyber Crimes Bureau's Southern
16 California High Tech Task Force to be manipulated and altered so they could convince a
17 Superior Court of California, County of Los Angeles, Alhambra Superior Court criminal
18 courtroom that KING AROGANT made a criminal threat on February 21, 2023.

19
20 133. County of Los Angeles Sheriff's Department Fraud and Cyber Crimes Bureau's
21 Southern California High Tech Task Force peace officer detectives had a duty to report to
22 the Los Angeles County District Attorney's office that KING AROGANT's original
23 GoPro video recordings did not show him committing a felony after they had of course,
24 reviewed KING AROGANT's original uninterrupted and continuous nearly seventeen-
25 minute GoPro video recording GX010586 that was recorded on February 21, 2023,
26 beginning at the exact approximately 9:59 a.m. and ending at approximately 10:16 a.m.

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 JUDICIAL ABUSE OF PROCESS, 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 Instead Southern California High Tech Task Force peace officer detectives intentionally
2 framed KING AROGANT by splitting up one original GoPro video recording into six
3 other video recordings (GL10586, GX010587, GX010588, GX010589, GX010590, &
4 GL010591), and then creating a GoPro video recording (manipulated GX010586) that
5 depicted a false video frame sequence of KING AROGANT shutting of his GoPro
6 camera as he stood inside the house of the now deceased Jennifer Hutton-Heger. All
7 involved County of Los Angeles Sheriff's Department Fraud and Cyber Crimes Bureau
8 detectives that were associated with this shady and corrupt criminal threats investigation
9 were guilty of willfully, knowingly, carelessly, maliciously, recklessly, and wantonly
10 violating California Commission on Peace Officer Standards and Training policies and
11 procedures and California Government Code § 6200.

12
13 134. Between February 23, 2023 and October 31, 2024, rogue and dishonest County of
14 Los Angeles District Attorney's Office criminal prosecutors George Gascón and Brian
15 Mark Rosenberg willfully, knowingly, recklessly, wantonly, maliciously, and callously
16 violated California Business and Professions Code § 6068, State Bar of California,
17 California Rules of Professional Conduct Rules (Revised 2023), Rules 1.2.1 Advising or
18 Assisting the Violation of Law, Rule 3.1 Meritorious Claims and Contentions, Rule 3.3
19 Candor Toward the Tribunal, Rule 3.4 Fairness to Opposing Party and Counsel, and Rule
20 3.8 Special Responsibilities of a Prosecutor by recklessly failing to turn over impeaching
21 phony GoPro video recordings GX010586 and GX010587, which was reckless under color
22 of law FRAUD done by Defendant Gascon and his criminal prosecutor Brian MARK Rosenberg
23 by them using, by them doing, by them executing, by them manipulating, by them employing,
24 by them directing, and by them otherwise engaging in illusory and manipulated illegal acts of
25 deceit, deception, fraud, conspiracies, concealment, and corruption so that Defendant Gascón
26 and Brian could gain an unfair, unjust, illegal, unlawful, and unconstitutional advantage over

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 JUDICIAL ABUSE OF PROCESS, 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, HIED, & NEGLIGENT HIED**

1 Plaintiff KING AROGANT.

2
3 135. At the preliminary hearing on April 4, 2023, and April 5, 2023, dishonest deputy
4 district attorney Brian Mark Rosenberg and Defendant Gascón willfully, knowingly,
5 carelessly, wantonly, recklessly, and callously violated California Evidence Code Section
6 1522, subdivision (b) by presenting to a criminal Superior Court of California as evidence
7 unoriginal, tainted, tampered with, edited, modified, and altered LASD-created GoPro
8 video recordings.

9
10 136. At the preliminary hearing on April 5, 2023, Brian Mark Rosenberg and Defendant
11 Gascón assisted Lying Billy Khounthavong in testifying falsely that KING AROGANT
12 shut off his GoPro camera for seven consecutive minutes during the make-believe knife
13 and make-believe criminal threats separate incidents. While Billy Khounthavong was on
14 the stand, racist, biased, and dishonest criminal prosecutor Brian Mark Rosenberg played
15 edited and altered GoPro video recording GX010586 that depicted and showed KING
16 AROGANT shutting off his GoPro camera while he was inside the home of now-
17 deceased fake victim Jennifer Hutton-Heger. This particular altered video recording
18 (GX010586) was never turned over to KING AROGANT. This particular altered video
19 recording (GX010586) was never turned over to KING AROGANT'S co-counsel Neil
20 Opdahl (SBN # 277596). This particular altered video recording (GX010586) was never
21 turned over to KING AROGANT'S private investigators, Carlos Jackson and then Joel
22 Wynn, at any time. In general, Brian Mark Rosenberg, James Garrison, Sharon Lee Woo,
23 George Gascon, Victor Manuel Rodriguez, and Ronald Geltz all recklessly violated
24 KING AROGANT'S United States Due Process Clause Fourteenth Amendment
25 constitutional civil rights by recklessly failing to turn over a copy of the original
26 GoPro video recordings to KING AROGANT and also they violated 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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IED**

1 AROGANT's constitutional Fourteenth Amendment civil rights by recklessly failing to
2 turn over a copy of altered GoPro video recordings that falsely showed and displayed
3 AROGANT shutting off his GoPro camera (GX010586), and a separate phony LASD-
4 created GoPro video recording (GX010587) that falsely showed AROGANT walking to
5 Hutton's front door while never being shown standing in front of her mirror as KING
6 AROGANT was seen doing so numerous times throughout the real GOPRO video
7 recordings. Defendant George Gascon and Defendant GoPro Manipulator willfully,
8 knowingly, recklessly, wantonly, maliciously, and callously violated KING
9 AROGANT's United States Fourteenth Amendment Due Process Clause constitutional
10 civil rights by recklessly failing to lodge phony LASD-created GoPro video recordings
11 GX010586 and GX010587 with the Superior Court of California, County of Los Angeles,
12 Alhambra Superior Court, Department 1 after MARK Rosenberg had recklessly
13 presented these impeaching and misleading video recordings at KING AROGANT's
14 rigged and unconstitutional court hearings on April 4, 2023, April 5, 2023, and February
15 2, 2024 in direct violation of California Rules of Court, Rule 2.1040, subdivision (b).

16
17 137. At the preliminary hearing, the County of Los Angeles Sheriff's Department,
18 County of Los Angeles District Attorney's Office Brian Mark Rosenberg, George Gascon
19 and rogue peace officer Billy Khounthavong further framed KING AROGANT by lying
20 about the length of Jennifer Hutton's first 911 call length, by lying that her first call ended
21 at 10:07 a.m. and that her second call commenced between 10:09 a.m. and 10:10 a.m.
22 LIARS! Defendant Gascon's own CAD report shows that Hutton's second 911 call
23 commenced at 10:08 a.m., and even the prejudiced judicial officer Michael Villalobos did
24 not dispute this fact during trial with KING AROGANT'S argument and presentation of
25 exculpatory evidence that showed that Hutton's first call ended at approximately 10:07
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 JUDICIAL ABUSE OF PROCESS, 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 a.m. and 50 seconds. Thus, the time gap between the end of Hutton's first 911 call and the
2 beginning of her second 911 call was approximately 30 seconds. Defendant Gascón was
3 wholly responsible for his criminal prosecutors and peace officer investigators willfully,
4 knowingly, recklessly, maliciously, wantonly, and callously presenting to a criminal
5 Superior Court of California fabricated and false trial court testimony that Hutton-
6 Heger's first 911 audio recording commenced at 10:03 AM and ended at 10:07 AM, and
7 that Hutton-Heger's second 911 audio recording commenced between 10:09 AM and
8 10:10 AM.

9
10 138. Defendant George Gascón willfully, knowingly, recklessly, wantonly, carelessly,
11 maliciously, and callously committed reckless under color of law fraud by tricking, fooling,
12 manipulating, deceiving, failing to tell, and failing to inform a Superior Court of California
13 courthouse that Jennifer Hutton-Heger's first 911 audio recordings began at 10:01 AM and
14 ended at 10:07 AM and 51 seconds, and failing to tell the same Superior Court of California
15 courthouse that Hutton-Heger's second 911 audio recording commenced at 10:08 AM., which
16 was reckless under color of law FRAUD done by Defendant Gascon and his criminal prosecutor
17 Brian MARK Rosenberg by them using, by them doing, by them executing, by them
18 manipulating, by them employing, by them directing, and by them otherwise engaging in
19 illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, and
20 corruption so that Defendant Gascón and MARK Rosenberg could gain an unfair, unjust, illegal,
21 unlawful, and unconstitutional advantage over

22
23 139. At the preliminary hearing on April 4, 2023, and April 5, 2023, in furtherance of
24 Los Angeles County's conspiracy to frame KING AROGANT for a violent and serious
25 felony crime it and George Gasón knew that he never committed. Brian MARK
26 Rosenberg, George Gascón, County of Los Angeles District Attorney's Office, County 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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 Los Angeles Sheriff's Department, and Billy Khounthavong presented to Superior Court
2 of California, County of Los Angeles, Alhambra Superior Court, Department 1 recklessly
3 broken up and altered LASD-created and manipulated GoPro video recordings
4 GX010586, GLO10587, GX010588, GX010589, and GX010590. The County of Los
5 Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's Southern California
6 High Tech Task Force illegally accessed, copied, searched, and manipulated KING
7 AROGANT's original GoPro video recordings according to their job duties and
8 descriptions. **NONE OF THE INVOLVED SOUTHERN CALIFORNIA HIGH
9 TECH TASK FORCE PEACE OFFICERS HAD ANY BUSINESS TOUCHING
10 AND ALTERING KING AROGANT'S ENTIRELY EXCULPATORY GOPRO
11 VIDEO RECORDINGS!**

12
13 140. In September 2023, KING AROGANT filed a Motion to Compel the County of
14 Los Angeles District Attorney's Office, George Gascón, and Brian MARK Rosenberg to
15 turn over and disclose an electronic copy of phony and bogus GoPro video recording
16 GX010586 that falsely portrayed KING AROGANT shutting off his GoPro camera.
17 Similar to many motions filed by KING AROGANT in the Alhambra Superior Court
18 regarding Defendant George Gascón's office recklessly failing to turn over and disclose
19 both exculpatory original GOPRO video recordings and impeaching phony County of
20 Los Angeles Sheriff's Department phony LASD-created GOPRO video recordings
21 GLO010586 and GX010587, prejudice Superior Court of California judicial officer
22 Michael Villalobos either never heard KING AROGANT'S motion to compel by holding
23 a hearing or (b) Villalobos recklessly denied it on the Superior Court record while
24 refusing to hold a hearing on the motion to compel.

25
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 JUDICIAL ABUSE OF PROCESS, 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**

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

14
15 142. Suzette's Clover October 2023 ruling in which she lied and fabricated a Superior
16 Court of California minute order that stated that she issued rogue County of Los Angeles
17 peace officer Billy Khounthavong's phony search warrant on February 22, 2024, can be
18 proven false based on the fact that the **FORGED SEARCH WARRANT** was missing
19 the following Superior Court of California, County of Los Angeles, Pasadena Superior
20 Court electronically stamped information that would PROVE it was REAL:

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

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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 143. Additionally, pursuant to the Trial Court Records Manual Revised 2020, Judicial
2 Council of California, on page 115 of 143, page 132 of 143, and 21 of 143, the rogue
3 Peace Officer Billy Khounthavong and Suzette Clover's search warrant is clearly proven
4 to be counterfeit and was never issued since the Superior Court of California, County of
5 Los Angeles, Pasadena Superior Court has no record of it existing while Pasadena
6 Superior Court was required pursuant to California Government Code Section 68152 to
7 retain a copy of it at the Pasadena Superior Court until 2033. Further, on page 132 of 143
8 in the Trial Court Records Manual Revised 2020, the Judicial Council of California states
9 that pursuant to California Penal Code Section 1534, the Pasadena Superior Court was
10 required to make Billy Khounthavong and Suzette Clover's counterfeit and make-believe
11 search warrant open to the public. Pasadena Superior Court has no electronic or physical
12 paper copy records of rouge Billy Khounthavong and RACIST Suzette Clover's PHONY
13 search warrant because it was never filed in the Pasadena Superior Court and it does not
14 exist. Further, no minute order was created on February 22, 2023, stating that Suzette
15 Clover had issued Lying Billy Khounthavong's search warrant. See now a true and
16 correct copy of the **Judicial Commission of California Trial Court Record Manual**
17 **(Revised June 4, 2024)** attached hereto as Verified Appendix of Exhibits, Exhibit

18 _____
19
20 144. After several months of being wrongfully incarcerated because Defendant Gascón and
21 Defendant GoPro Manipulator had willfully, knowingly, recklessly, wantonly, maliciously, and
22 callously failed to turn over KING AROGANT's real GoPro video recordings and also phony
23 GoPro video recordings GX010586 and GX010587. Combined with Defendant George Gascón
24 and his numerous criminal prosecutors involved (MARK Rosenberg and Victor Manuel
25 Rodriguez to name just two of many) had recklessly failed to turn over to KING AROGANT
26 and his racist and lying expert witness Thomas Leo Guzman-Sanchez a stand-alone copy 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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 Jennifer Hutton-Heger Hutton's first 911 audio recordings so that its exact time stamps could be
2 examined so that KING AROGANT could prove that Hutton-Heger's first 911 audio recording
3 commenced at 10:01 AM and ended at 10:07 AM and 51 seconds, just as County of Los
4 Angeles Sheriff's Department Temple City police station CAD reports had stated it did.
5 Combined with Defendant George Gascón and his numerous criminal prosecutors involved
6 (MARK Rosenberg and Victor Manuel Rodriguez, to name just two of many) had recklessly
7 failed to turn over to KING AROGANT and his racist and lying expert witness Thomas Leo
8 Guzman-Sanchez a stand-alone copy of Jennifer Hutton-Heger Hutton's second 911 audio
9 recordings so that its exact time stamps could be examined so that KING AROGANT could
10 prove that Hutton-Heger's second 911 audio recording commenced at 10:08 AM, just as County
11 of Los Angeles Sheriff's Department Temple City police station CAD reports had stated it did.
12 On October 17, 2023, KING AROGANT threw in the towel during the first day of his criminal
13 felony trial and pleaded no contest to one count of making a criminal threat to Jennifer Hutton-
14 Heger on February 21, 2023. KING AROGANT was placed on formal probation. Additionally,
15 as part of his plea bargain, his original GoPro Hero 10 camera and its original SanDisk 256
16 gigabyte micro SD card were returned to him.

17
18 145. Between February 24, 2023, and October 31, 2024, Defendant Gascón and his criminal
19 prosecutors did everything in their power to conceal, hide, and fail to disclose to KING
20 AROGANT a stand-alone copy of Jennifer Hutton-Heger's first 911 audio recording and a
21 stand-alone copy of Jennifer Hutton-Heger's second 911 audio recording because they knew that
22 releasing this exculpatory evidence would prove that the gap between the end of Hutton-Heger's
23 first 911 audio recording and the start of her second 911 call was approximately 30 seconds to 1
24 minute only, and thus, it would have been impossible for a knife confrontation, knife
25 brandishing, and separate criminal threats incident to all had occurred between the time Hutton-
26 Heger first 911 call ended and her second 911 call began as Hutton falsely testified all occurred

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 JUDICIAL ABUSE OF PROCESS, 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**

1 on the early morning of February 21, 2023. Defendant Gascón and his co-conspirators, such
2 as Brian MARK Rosenberg willfully, knowingly, recklessly, wantonly, maliciously, and
3 callously violated KING AROGANT's Fourteenth Amendment Due Process Clause
4 constitutional civil rights by recklessly failing to turn over stand-alone copies of Hutton's first
5 and second 911 audio recordings. Defendant Gascón and his co-conspirators, such as Brian
6 MARK Rosenberg, willfully, knowingly, recklessly, wantonly, maliciously, and callously
7 violated KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil
8 rights by recklessly allowing rogue and dishonest County of Los Angeles peace officer Billy S.
9 Khounthavong to testify falsely that Jennifer Hutton-Heger's first 911 call commenced at 10:03
10 AM and ended at 10:07 AM. Defendant Gascón and his co-conspirators, such as Brian MARK
11 Rosenberg, willfully, knowingly, recklessly, wantonly, maliciously, and callously violated
12 KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights by
13 recklessly allowing rogue and dishonest County of Los Angeles peace officer Billy S.
14 Khounthavong to testify falsely that Jennifer Hutton-Heger's second 911 call commenced
15 between 10:09 AM and 10:10 AM.

16
17 146. Between February 24, 2023, and October 31, 2024, Defendant Gascón and his criminal
18 prosecutors committed reckless under color of law DECEIT by tricking, fooling, manipulating,
19 deceiving, failing to tell, concealing from, and failing to inform a Superior Court of California
20 courthouse that Jennifer Hutton-Heger's first 911 audio recording commenced at 10:01 AM and
21 ended at nearly 10:08 AM, which was reckless under color of law FRAUD done by Defendant
22 Gascon and his criminal prosecutor Brian MARK Rosenberg by them using, by them doing, by
23 them executing, by them manipulating, by them employing, by them directing, and by them
24 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
25 conspiracies, concealment, and corruption so that Defendant Gascón and Brian could gain an
26 unfair, unjust, illegal, unlawful, and unconstitutional advantage over Plaintiff 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 JUDICIAL ABUSE OF PROCESS, 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.
2

3 147. Between February 24, 2023, and October 31, 2024, Defendant Gascón and his criminal
4 prosecutors committed reckless under color of law DECEIT by tricking, fooling, manipulating,
5 deceiving, failing to tell, concealing from, and failing to inform a Superior Court of California
6 courthouse that Jennifer Hutton-Heger's second 911 audio recording commenced at 10:08 AM
7 and seconds, which was reckless under color of law FRAUD done by Defendant Gascon and his
8 criminal prosecutor Brian MARK Rosenberg by them using, by them doing, by them executing,
9 by them manipulating, by them employing, by them directing, and by them otherwise engaging
10 in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment,
11 and corruption so that Defendant Gascón and Brian could gain an unfair, unjust, illegal,
12 unlawful, and unconstitutional advantage over Plaintiff KING AROGANT.
13

14 148. Between February 24, 2023, and October 31, 2024, Defendant Gascón and his criminal
15 prosecutors committed reckless under color of law FRAUD by fabricating testimony, lying to,
16 misleading, and otherwise deceiving a Superior Court of California courthouse so that it would
17 foolishly believe that Jennifer Hutton-Heger's first 911 audio recording commenced at 10:03
18 AM and ended at nearly 10:07 AM, which was reckless under color of law FRAUD done by
19 Defendant Gascon and his criminal prosecutor Brian MARK Rosenberg by them using, by them
20 doing, by them executing, by them manipulating, by them employing, by them directing, and by
21 them otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
22 conspiracies, concealment, and corruption so that Defendant Gascón and Brian could gain an
23 unfair, unjust, illegal, unlawful, and unconstitutional advantage over Plaintiff KING
24 AROGANT.
25
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 JUDICIAL ABUSE OF PROCESS, 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**

1 149. Between February 24, 2023, and October 31, 2024, Defendant Gascón and his criminal
2 prosecutors committed reckless under color of law FRAUD by fabricating testimony, lying to,
3 misleading, and otherwise deceiving a Superior Court of California courthouse so that it would
4 foolishly believe that Jennifer Hutton-Heger's second 911 audio recording commenced between
5 10:09 AM and 10:10 AM, which was reckless under color of law FRAUD done by Defendant
6 Gascon and his criminal prosecutor Brian MARK Rosenberg by them using, by them doing, by
7 them executing, by them manipulating, by them employing, by them directing, and by them
8 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
9 conspiracies, concealment, and corruption so that Defendant Gascón and Brian could gain an
10 unfair, unjust, illegal, unlawful, and unconstitutional advantage over Plaintiff KING
11 AROGANT.

12
13 150. On the first day of KING AROGANT's criminal bench trial, which commenced on
14 October 17, 2023, Defendant Gascón and his criminal prosecutors committed reckless under
15 color of law FRAUD by creating a phony County of Los Angeles Sheriff's Department Temple
16 City police station transcript of Hutton-Heger's second 911 call that falsely stated that her
17 second 911 audio recording commenced at approximately 10:09 AM and 50 seconds, which was
18 reckless under color of law FRAUD done by Defendant Gascón for the unlawful purpose of
19 tricking, fooling, lying to, fabricating evidence, and otherwise deceiving a Superior Court of
20 California criminal courthouse so that it would foolishly believe that Jennifer Hutton-Heger's
21 second 911 audio recording commenced at approximately 10:10 A.M. Defendant Gascón trial
22 court second 911 call audio recording transcript was so phony and shoddy that it appeared to
23 have been created on Microsoft Word, which was reckless under color of law FRAUD done by
24 Defendant Gascon and his criminal prosecutor Brian MARK Rosenberg by them using, by them
25 doing, by them executing, by them manipulating, by them employing, by them directing, and by
26 them otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,

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 JUDICIAL ABUSE OF PROCESS, 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 conspiracies, concealment, and corruption so that Defendant Gascón and Brian could gain an
2 unfair, unjust, illegal, unlawful, and unconstitutional advantage over Plaintiff KING
3 AROGANT.

4
5 151. On the first day of KING AROGANT's criminal bench trial, which commenced on
6 October 17, 2023, Defendant Gascón and his criminal prosecutors committed reckless under
7 color of law DECEIT by creating a phony County of Los Angeles Sheriff's Department Temple
8 City police station transcript of Hutton-Heger's second 911 call that falsely stated that her
9 second 911 audio recording commenced at approximately 10:09 AM and 50 seconds, which was
10 reckless under color of law DECEIT done by Defendant Gascón for the unlawful purpose of
11 tricking, fooling, lying to, fabricating evidence, and otherwise deceiving a Superior Court of
12 California criminal courthouse so that it would foolishly believe that Jennifer Hutton-Heger's
13 second 911 audio recording commenced at approximately 10:10 A.M. Defendant Gascón trial
14 court second 911 call audio recording transcript was so phony and shoddy that it appeared to
15 have been created on Microsoft Word, which was reckless under color of law FRAUD done by
16 Defendant Gascon and his criminal prosecutor Brian MARK Rosenberg by them using, by them
17 doing, by them executing, by them manipulating, by them employing, by them directing, and by
18 them otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
19 conspiracies, concealment, and corruption so that Defendant Gascón and Brian could gain an
20 unfair, unjust, illegal, unlawful, and unconstitutional advantage over Plaintiff KING
21 AROGANT.

22
23 152. On the first day of KING AROGANT's criminal bench trial, which commenced on
24 October 17, 2023, Defendant Gascón and his criminal prosecutors committed reckless under
25 color of law DECEIT by creating a phony County of Los Angeles Sheriff's Department Temple
26 City police station transcript of Hutton-Heger's second 911 call that falsely stated that her

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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 second 911 audio recording commenced at approximately 10:09 AM and 50 seconds, which was
2 reckless under color of law DECEIT done by Defendant Gascón for the unlawful purpose of
3 tricking, fooling, lying to, fabricating evidence, concealing from, and otherwise deceiving a
4 Superior Court of California criminal courthouse from knowing the truth that Jennifer Hutton-
5 Heger's second 911 audio recording commenced at 10:08 AM as was stated on County of Los
6 Angeles Sheriff's Department's Temple City police station CAD report. Defendant Gascón's
7 trial court second 911 call audio recording transcript was so phony and shoddy that it appeared
8 to have been created on Microsoft Word, which was reckless under color of law FRAUD done
9 by Defendant Gascon and his criminal prosecutor Brian MARK Rosenberg by them using, by
10 them doing, by them executing, by them manipulating, by them employing, by them directing,
11 and by them otherwise engaging in illusory and manipulated illegal acts of deceit, deception,
12 fraud, conspiracies, concealment, and corruption so that Defendant Gascón and Brian could gain
13 an unfair, unjust, illegal, unlawful, and unconstitutional advantage over Plaintiff KING
14 AROGANT.

15
16 153. As was stated previously in paragraphs 143-150 between February 24, 2023, and October
17 31, 2024, Defendant Gascón and his co-conspirators committed reckless under color of law
18 fraud and reckless under color of law deceit regarding 911 audio recordings evidence in
19 frivolous and unconstitutional Superior Court of California, County of Los Angeles, Pasadena
20 Superior Court case GA114055. Defendant Gascón and his co-conspirators (including but not
21 limited to Brian MARK Rosenberg and Victor Manuel Rodriguez) knew that they were
22 committing under color fraud, reckless under color of law deceit, and recklessly violated KING
23 AROGANT's constitutional Fourteenth Amendment constitutional civil rights because they had
24 all reviewed a County of Los Angeles Sheriff's Department Temple City deputy worksheet in
25 which rogue peace officer Daniel Esqueda documented that Jennifer Hutton Heger's second 911
26 call was dispatched at 10:08 AM.

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 JUDICIAL ABUSE OF PROCESS, 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**

1 154. As was stated previously in paragraphs 143-150 between February 24, 2023, and October
2 31, 2024 Defendant Gascón and his co-conspirators committed reckless under color of law fraud
3 and reckless under color of law deceit regarding 911 audio recordings evidence in frivolous and
4 unconstitutional Superior Court of California, County of Los Angeles, Pasadena Superior Court
5 case GA114055. Defendant Gascón and his co-conspirators (including but not limited to Brian
6 MARK Rosenberg and Victor Manuel Rodriguez) knew that they were committing under color
7 fraud, under color of law deceit, and recklessly violating KING AROGANT's constitutional
8 Fourteenth Amendment constitutional civil rights because they had all reviewed a County of Los
9 Angeles Sheriff's Department Temple City deputy worksheet in which rogue peace officer
10 Aaron D. Contreras documented that Jennifer Hutton Heger's second 911 call was dispatched at
11 10:08 AM.

12
13 155. As was stated previously in paragraphs 143-150 between February 24, 2023, and October
14 31, 2024, Defendant Gascón and his co-conspirators committed reckless under color of law
15 fraud and reckless under color of law deceit regarding 911 audio recordings evidence in
16 frivolous and unconstitutional Superior Court of California, County of Los Angeles, Pasadena
17 Superior Court case GA114055. Defendant Gascón and his co-conspirators (including but not
18 limited to Brian MARK Rosenberg and Victor Manuel Rodriguez) knew that they were
19 committing under color fraud, under color of law deceit, and recklessly violating KING
20 AROGANT's constitutional Fourteenth Amendment constitutional civil rights because they had
21 all reviewed a County of Los Angeles Sheriff's Department Temple City CAD summary that
22 clearly showed and stated that Jennifer Hutton-Heger's first 911 call commenced at 10:01 AM,
23 that she was placed on hold at approximately 10:05 AM, and that her first 911 call ended just
24 prior to 10:08 AM.

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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 156. As was stated previously in paragraphs 143-150 between February 24, 2023, and October
2 31, 2024, Defendant Gascón and his co-conspirators committed reckless under color of law
3 fraud and reckless under color of law deceit regarding 911 audio recordings evidence in
4 frivolous and unconstitutional Superior Court of California, County of Los Angeles, Pasadena
5 Superior Court case GA114055. Defendant Gascón and his co-conspirators (including but not
6 limited to Brian MARK Rosenberg and Victor Manuel Rodriguez) knew that they were
7 committing under color fraud, under color of law deceit, and recklessly violating KING
8 AROGANT's constitutional Fourteenth Amendment constitutional civil rights because they had
9 all reviewed a County of Los Angeles Sheriff's Department Temple City CAD summary that
10 clearly showed and stated that Jennifer Hutton-Heger's second 911 call was commenced at
11 10:08 AM and dispatched to her home at 10:08 AM.

12
13 **See now County of Los Angeles Sheriff's Department Temple City CAD report summary**
14 **for February 21, 2023, Deputy Worksheet for rogue peace officer Aaron D. Contreras, and**
15 **Deputy Worksheet for rogue peace officer Daniel Esqueda Verified Appendix of Exhibits,**
16 **Exhibit _____**

17
18 **C. DEFENDANTS GEORGE GASCÓN, GAVIN CHRISTOPHER NEWSOM,**
19 **ROBERT ANDRES BONTA, PETER DWIGHT HALLORAN, DENNIS L.**
20 **BECK JR., & LEAH TAMU WILSON RECEIVED FAIR NOTICE THAT**
21 **THEY WERE ALL WILLFULLY, KNOWINGLY, RECKLESSLY,**
22 **WANTONLY, CARELESSLY, AND CALLOUSLY VIOLATED AROGANT**
23 **HOLLYWOOD'S FOURTEENTH AMENDMENT CONSTITUTIONAL**
24 **CIVIL RIGHTS**

25 157. On November 28, 2023, at 4:02 AM, Defendants Gavin Christopher Newsom
26 (gavin.newsom@gov.ca.gov), Leah Tamu Wilson (leah.wilson50@yahoo.com)

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 JUDICIAL ABUSE OF PROCESS, 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 leaht.wilson@calbar.ca.gov) Robert Andres Bonta (robert.bonta@doj.ca.gov), Peter
2 Dwight Halloran (peter.halloran@doj.ca.gov), Dennis L. Beck Jr.
3 (dennis.beck@doj.ca.gov), over one hundred County of Los Angeles criminal prosecutors
4 and State Bar licensed attorneys, and DOES 1-10 all received an email containing
5 detailed facts and allegations that described how County of Los Angeles deputy district
6 attorney Brian MARK Roseberg, rogue peace officer Billy D. Khounthavong, and
7 County of Los Angeles willfully, knowingly, recklessly, carelessly, wantonly, maliciously,
8 and callously framed KING AROGANT by recklessly presenting to a Superior Court of
9 California criminal courtroom phony and bogus LASD-created GoPro video recordings that
10 depicted and displayed KING AROGANT shutting off his GoPro camera inside of the now
11 deceased FAKE VICTIM Jennifer Hutton-Heger's home on February 21, 2023. Near the end of
12 his detailed email KING AROGANT typed the following:

13
14 **AT THE BOTTOM OF THIS EMAIL IS AN ATTACHMENT FOR THE**
15 **ORIGINAL MP4 VIDEO FILE AND IT CAN BE EASILY DOWNLOADED TO**
16 **ANYONE EMAILED HEREIN**

17
18 Attached to the end of KING AROGANT's electronic mail was a Google Gmail virus-
19 scanned electronic copy of KING AROGANT's nearly fifteen-minute REAL GoPro
20 video recording that did not depict and display him doing any of the following:

- 21 1. Banging, kicking, and otherwise touching Jennifer Hutton-Heger's doors inside her
22 home.
- 23 2. Making a criminal threat.
- 24 3. Brandishing a knife.
- 25 4. Interacting or engaging with Hutton inside of her home in-person
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

5. Jennifer Hutton-Heger is not seen at all on camera in the long video recording while KING AROGANT is inside of her home.

The nearly fifteen-minute GoPro video recording titled **REAL VIDEO FOR 2-21-2023.mp4** was attached to KING AROGANT's electronic mail as a blue highlighted hyper-linked file in MP4 video recording format that was playable on any Personal Computer laptop, Macintosh laptop ("Macbook"), Android-powered mobile device, or Apple I-Phone. See now KING AROGANT's November 28, 2023 email to Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 attached hereto as Exhibit ____ of KING AROGANT's Verified Appendix of Exhibits. All emailed California Department of Justice Defendants, Leah Tamu Wilson, and Governor Newsom received FAIR NOTICE that the County of Los Angeles recklessly framed KING AROGANT for a serious and violent felony they all knew with one hundred percent certainty that KING AROGANT never committed. Yet, as of October 31, 2024, all emailed California Department of Justice Defendants, Leah Tamu Wilson, and Governor Gavin Newsom have all willfully, knowingly, recklessly, carelessly, wantonly, maliciously, and callously with under color of law deliberate indifference to the federally protected constitutional civil rights of KING AROGANT, recklessly failed to do any of the following for nearly twelve consecutive months after they all were given FAIR NOTICE, and after they all received FAIR NOTICE:

1. Respond to KING AROGANT's November 28, 2023 email.
2. Request that County of Los Angeles turn over and disclose to them all sixteen GoPro video recordings recklessly presented at KING AROGANT's preliminary hearing, and especially phony GoPro video recordings GX010586 and GX010587 that depicted and displayed KING AROGANT shutting off his GoPro camera.

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 JUDICIAL ABUSE OF PROCESS, 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 3. Request that County of Los Angeles District Attorney's Office turn over and disclose
2 to California Department of Justice all April 4, 2023 and all April 5, 2023 preliminary
3 hearing transcripts.

4 4. Launch an investigation into all KING AROGANT's November 28, 2023 emailed
5 Allegations and accusations that claimed County of Los Angeles District Attorney's
6 Office recklessly falsified evidence inside a criminal Superior Court of California, which
7 was in direct violation of California Government Code § 6200

8 158. On information and belief, Defendants Gavin Christopher Newsom, Leah Tamu
9 Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-
10 10 between November 28, 2023, and October 31, 2024 willfully, knowingly, maliciously,
11 wantonly, carelessly, and callously had a meeting of minds with Defendant George
12 Gascón and other named and unnamed County of Los Angeles District Attorney's Office
13 employees and attorneys to violate KING AROGANT's constitutional civil rights by
14 doing all the aforementioned and by staying silent while condoning, tolerating,
15 acquiescing, consenting to, overlooking, permitting, and otherwise continuing to allow
16 County of Los Angeles criminal prosecutors to recklessly frame KING AROGANT for a
17 serious and violent crime he did not commit by tainting, tampering with, altering,
18 fabricating, and otherwise manipulating his exculpatory GoPro video recordings
19 evidence. Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres
20 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 all
21 willfully, knowingly, carelessly, wantonly, maliciously, and callously violated the United
22 States Constitution and KING AROGANT's United States Fourteenth Amendment Due
23 Process Clause constitutional civils, and they all committed under color of law fraud and
24 deceit by recklessly hiding from Superior Court of California, County of Los Angeles,
25 Alhambra Superior Court, Department 1 the fact that they had been electronically served
26 a copy of a nearly fifteen-minute GoPro video recording that proved KING AROGANT's

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 JUDICIAL ABUSE OF PROCESS, 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 factual innocence by clear and convincing evidence and that based on KING
2 AROGANT's newly discovered video recording evidence served upon them, they all had
3 (with the exception of Defendant Newsom) a prosecutorial duty and obligation to aid and
4 assist KING AROGANT with immediately overturning his wrongful felony conviction
5 pursuant to the **State Bar of California, Rule 3.8, Special Responsibilities of a**
6 **Prosecutor**. Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight
7 Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 all willfully, knowingly,
8 carelessly, wantonly, maliciously, and callously violated **State Bar of California, Rule**
9 **3.8, Special Responsibilities of a Prosecutor** by being served electronically video
10 recording evidence that proved KING AROGANT's factual innocence by clear and
11 convincing evidence, and then recklessly ignoring that electronically served exculpatory
12 evidence by neglecting their legal duty and legal obligation as criminal prosecutors to aid
13 and assist KING AROGANT with overturning his wrongful conviction, in direct
14 violation of Rule 3.8.

15
16 Rule 3.8 provides:

17 **(f) When a prosecutor knows* of new, credible and material**
18 **evidence creating a reasonable* likelihood that a convicted**
19 **defendant did not commit an offense of which the defendant was**
20 **convicted, the prosecutor shall: (1) promptly disclose that**
21 **evidence to an appropriate court or authority, and (2) if the**
22 **conviction was obtained in the prosecutor's jurisdiction, (i)**
23 **promptly disclose that evidence to the defendant unless a court**
24 **authorizes delay, and (ii) undertake further investigation, or**
25 **make reasonable* efforts to cause an investigation, to determine**
26 **whether the defendant was convicted of an offense that the**
27 **defendant did not commit. (g) When a prosecutor knows* of clear**
28 **and convincing evidence establishing that a defendant in the**
prosecutor's jurisdiction was convicted of an offense that the
defendant did not commit, the prosecutor shall seek to remedy
the conviction.

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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RULE 3.8 COMMENT PROVIDES:

Comment [1] A prosecutor has the responsibility of a minister of justice and not simply that of an advocate. This responsibility carries with it specific obligations to see that the defendant is accorded procedural justice, that guilt is decided upon the basis of sufficient evidence, and that special precautions are taken to prevent and to rectify the conviction of innocent persons.* This rule is intended to achieve those results. All lawyers in government service remain bound by rules 3.1 and 3.4.

Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10's willful, knowing, careless, wanton, malicious, and callous illegal acts, actions, misconduct, misdoings, misdeeds, and transgressions of recklessly ignoring KING AROGANT's very serious November 28, 2023 electronic mail, and recklessly failing to aid and assist KING AROGANT with overturning his wrongful conviction based upon the newly discovered evidence served upon them that proved KING AROGANT's factual innocence by clear and convincing evidence disqualifies Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 from any shape, type, or form of judicial, electoral or prosecutorial immunity.

159. Defendants Leah Tamu Wilson, Gavin Christopher Newsom, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10's willful, knowing, reckless, wanton, malicious, and callous illegal acts, actions, misconduct, misdoings, misdeeds, and transgressions in since November 28, 2023, recklessly allowing County of Los Angeles criminal prosecutors and dishonest peace officers to willfully and recklessly violate California Government Code § 6200, proves by clear and convincing evidence that they all received FAIR NOTICE and disqualifies them from any shape, form, or type of electoral, judicial, or prosecutorial immunity.

160. On November 28, 2023 racist and celebrity helping Defendant George Gascón

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1 (ggascon@da.lacounty.gov) was electronically served the same detailed electronic mail and
2 nearly fifteen-minute REAL GoPro video recording in which he did not see or eye-witness
3 KING AROGANT do any of the following:

- 4 1. Banging, kicking, and otherwise touching Jennifer Hutton-Heger's doors inside her
5 home.
- 6 2. Making a criminal threat.
- 7 3. Brandishing a knife.
- 8 4. Interacting or engaging with Hutton inside of her home in-person
- 9 5. Jennifer Hutton-Heger is not seen at all on camera in the long video recording
10 while KING AROGANT is inside of her home.

11
12 The nearly fifteen-minute GoPro video recording titled **REAL VIDEO FOR 2-21-**
13 **2023.mp4** was attached to KING AROGANT's electronic mail as a blue highlighted
14 hyper-linked file in MP4 video recording format that was playable on any Personal
15 Computer laptop, Macintosh laptop ("Macbook"), Android-powered mobile device, or
16 Apple I-Phone. See now KING AROGANT's November 28, 2023 email to George
17 Gascón attached hereto as Exhibit ____ of KING AROGANT's Verified Appendix of
18 Exhibits. Defendant George Gascón and the Office of George Gascón received FAIR
19 NOTICE that his County of Los Angeles criminal prosecutors, including but not limited
20 to *Brian MARK Rosenberg (SBN # 291501)*, *Victor Manuel Rodriguez (SBN #*
21 *156150)*, *James William Garrison (SBN # 157070)*, *Stephanie Pearl Mire (SBN #*
22 *158918)*, *Ronald Milliard Geltz (SBN # 126699)*, and *Sharon Lee Woo (SBN # 148139)*
23 *(all of which were electronically served nearly fifteen-minute REAL GoPro video*
24 *recording on November 28, 2023, with the exception of MARK)* recklessly framed
25 KING AROGANT for a serious and violent felony they all knew with one hundred
26 percent certainty that KING AROGANT never committed. Yet, as of October 31, 2024,

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 JUDICIAL ABUSE OF PROCESS, 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 George Gascón and the Office of George Gascón have all willfully, knowingly,
2 recklessly, carelessly, wantonly, maliciously, and callously with under color of law
3 deliberate indifference to the federally protected constitutional civil rights of KING
4 AROGANT, recklessly failed to do any of the following for nearly twelve consecutive
5 months after they all were given FAIR NOTICE, and after they all received FAIR
6 NOTICE:

- 7 1. Respond to KING AROGANT's November 28, 2023 email.
- 8 2. Request that County of Los Angeles criminal prosecutors involved with frivolous criminal
9 case GA114055 turn over and disclose to them all sixteen GoPro video recordings
10 recklessly presented at the preliminary hearing held on April 4, 2023 and April 5, 2023,
11 and especially phony LASD-created GoPro video recordings GLO10586 and GLO10587
12 that depicted and displayed KING AROGANT shutting off his GoPro camera with a bare
13 right arm.
- 14 3. Immediately request that County of Los Angeles rogue, racist, biased, and dishonest
15 criminal prosecutors Brian MARK Rosenberg and Victor Manuel Rodriguez's recklessly
16 falsified evidence presented inside of the Superior Court of California, County of Los
17 Angeles, Alhambra Superior Court, Department 1 on April 4, 2023 and April 5, 2023
18 be immediately turned over and disclosed to George Gascón and the Office of George
19 Gascón.
- 20 4. Launch an investigation into all KING AROGANT's November 28, 2023 emailed
21 allegations and accusations that claimed County of Los Angeles District Attorney's
22 Office criminal prosecutors and investigators recklessly falsified evidence inside of a
23 Superior Court of California Superior Court criminal courtroom.
- 24 5. Request that Victor Manuel Rodriguez and MARK Rosenberg immediately turn over and
25 disclose impeaching and phony LASD-created GoPro video recordings GX010586 and
26 GX010587.
- 27 6. Request that rogue, racist, biased, and dishonest involved County of Los Angeles
28 criminal prosecutors immediately turn over and disclose copies of impeaching phony
29 LASD-created GoPro video recordings GX010586 and GX010587 in compliance with
30 County of Los Angeles District Attorney's Office's Legal Policies and Procedures,
31 Chapter 14.

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

- 1 7. Request that Victor Manuel Rodriguez and MARK Rosenberg immediately turn over and
2 disclose all sixteen GoPro video recordings announced, presented, and admitted into
3 Superior Court of California, County of Los Angeles, Alhambra Superior Court,
4 Department 1 on April 4, 2023 and April 5, 2023, and testified to by rogue peace officer
5 Lying Billy Khounthavong on April 5, 2023.
- 6 8. Request that Victor Manuel Rodriguez and MARK Rosenberg immediately turn over and
7 Disclose a Hardcopy of a Detailed CAD report showing the exact time each of Jennifer
8 Hutton-Heger's first and second 911 audio recordings commenced and ended

9 161. On information and belief Defendant George Gascón and his Office February 24,
10 2023, and October 31, 2024, willfully, knowingly, recklessly, wantonly, carelessly,
11 maliciously, and callously had a meeting of minds with with Leah Tamu Wilson, Gavin
12 Christopher Newsom, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr.,
13 George Gascón, and DOES 1-10; rogue and biased County of Los Angeles criminal
14 prosecutors Brian Mark Rosenberg and Victor Manuel Rodriguez; named and unnamed
15 County of Los Angeles peace officers, criminal investigators, employees and attorneys to
16 conspire to recklessly violate the United States Constitution and KING AROGANT's
17 federally protected Fourth and Fourteenth Amendment constitutional civil rights by
18 allowing County of Los Angeles criminal prosecutors, criminal investigators and peace
19 officers to recklessly frame KING AROGANT by tainting, tampering with, altering,
20 fabricating, and otherwise manipulating his exculpatory GoPro video recordings
21 evidence, and by recklessly failing to disclose and turn over all the previously stated
22 exculpatory and impeaching criminal evidence in frivolous case GA114055.

23 162. From February 24, 2023, until October 31, 2024, and continuing on to this present
24 day. Defendant George Gascón and his District Attorney's Office have received
25 numerous telephone calls, court motions, facsimiles, and emails that he and his office
26 turn over and disclose the following impeaching and exculpatory evidence pursuant to

27 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,**
28 **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 JUDICIAL ABUSE OF PROCESS, 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.
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1 California Penal Code § 1054, et seq, County of Los Angeles District Attorney's Office
2 Legal Policies and Procedures (especially Chapter 14, Disclosure of Exculpatory and
3 Impeachment Information), Brady v. Maryland, and the Fourteenth Amendment Due
4 Process Clause of the United States Constitution:
5

- 6 1. Certified court-stamped copy of phony and bogus County of Los Angeles Sheriff's
7 Department doctored, phony, and forged probable cause declaration.
- 8 2. Certified court-stamped copies of rogue peace officer Billy S. Khounthavong's fabricated
9 and forged search warrant.
- 10 3. Copies of impeaching and phony LASD-created GoPro video recordings GX010586
11 and GX010587 that were used as tools to frame KING AROGANT by these impeaching
12 video recordings falsely showing KING AROGANT shutting off his GoPro camera while
13 wearing different clothing than he had on February 21, 2023.
- 14 4. Copies of all sixteen GoPro video recordings played or presented at the preliminary
15 hearing conducted on April 4, 2023, and April 5, 2023.
- 16 5. A detailed County of Los Angeles Sheriff's Department Temple City police station CAD
17 Report that showed the exact time Jennifer Hutton-Heger's first 911 call commenced and
18 and the exact time it concluded.
- 19 6. A detailed County of Los Angeles Sheriff's Department Temple City police station CAD
20 Report that showed the exact time Jennifer Hutton-Heger's second 911 call commenced
21 and the exact time it concluded.
- 22 7. Superior Court of California electronic court records that showed the exact date and time
23 Lying Billy Khounthavong's fabricated and forged search warrant was filed and issued by
24 Lying judicial officer Suzette Clover.
- 25 8. Superior Court of California electronic court records that showed the exact date and time
26 Superior of California judicial officer Jana Seng issued lying and rogue peace officer Aaron
27 D. Contreras' phony and bogus probable cause determination by finding probable cause
28 while there was no court reporter present.

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 JUDICIAL ABUSE OF PROCESS, 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 9. Provide co-counsel Neil Opdahl (SBN # 277596), Carlos Anthony Jackson, Thomas Leo
2 Guzman-Sanchez, and Joel Wyenn with immediate access to all audio and video
3 recording evidence uploaded by County of Los Angeles peace officers and criminal
4 prosecutors to Axon Enterprise, Inc.'s evidence.com
- 5 10. Provide co-counsel Neil Opdahl (SBN # 277596), Carlos Anthony Jackson, Thomas Leo
6 Guzman-Sanchez, Joel Wyenn, and KING AROGANT with a replica copy of all GoPro
7 video recordings stored on the 256 gigabyte SanDisk Micro SD card found inside of the
8 original GoPro camera that was illegally seized by County of Los Angeles peace officers
9 on February 21, 2023.

10 163. While the County of Los Angeles District Attorney's Office's Legal Policies and
11 Procedures, Chapter 14 mandated and required Defendant George Gascón to turn over
12 and disclose all the above-stated impeaching and exculpatory evidence to KING
13 AROGANT. Defendant Gascón willfully, knowingly, wantonly, maliciously, carelessly
14 and callously violated the United States Constitution and KING AROGANT's Fourteenth
15 Amendment Due Process Clause constitutional civil rights and put the interest of
16 protecting his deputy district attorney Brian MARK Rosenberg from going to prison for
17 recklessly violating California Government Code § 6200 above and ahead the interest of
18 administering justice by proving KING AROGANT with the multiple times requested
19 impeaching and exculpatory evidence he needed to exonerate himself. THIS WAS A
20 VERY FALSE CRIMINAL CASE. Between February 21, 2023, and October 31, 2024,
21 the only inculpatory evidence Defendant Gascón and his co-conspirators County of Los
22 Angeles criminal prosecutors and peace officers had admitted in a criminal Superior
23 Court of California courtroom was the ridiculously fabricated trial court testimony of
24 lying FAKE VICTIM Jennifer Hutton-Heger. Defendant George Gascón and his co-
25 conspirators two 911 audio recordings, police bodycam video recordings, and original
26 GoPro video recordings were exculpatory evidence. See now County of Los Angeles
27 District Attorney's Office Legal Policies Manual, Chapter 14, attached as Verified

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 JUDICIAL ABUSE OF PROCESS, 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**

1 Appendix of Exhibits, Exhibit _____ Not only did Defendant George Gascón and his
2 co-conspirators' illegal acts, actions, misconduct, misdoings, misdeeds, and
3 transgressions of willfully, knowingly, recklessly, wantonly, maliciously, and callously
4 allowing his County of Los Angeles criminal prosecutors to recklessly allowing
5 witnesses to testify falsely, to recklessly fail to turn over and disclose exculpatory 911
6 audio recordings and exculpatory GoPro video recordings, to recklessly fail to turn over
7 certified copies of phony and forged search warrant and probable cause affidavits, to
8 recklessly, and to recklessly fail to turn over and disclose copies of impeaching GoPro
9 video recordings that depict and display KING AROGANT shutting off his GoPro
10 camera while wearing different clothing than he had on February 21, 2023; not only
11 violated County of Los Angeles District Attorney's Office legal policies and procedures,
12 California Penal Code § 1054, the United States Constitution, and numerous State Bar of
13 California Rules of Professional Conduct, but Defendant Gascón and his co conspirators'
14 illegal acts, actions, misconduct, misdoings, misdeeds, and transgressions also recklessly
15 violated American Bar Association, Model Rules of Professional Conduct, Advocate,
16 Rules 3.3 and 3.4.

17 American Bar Association, Model Rules of Professional Conduct, Advocate, Rule 3.3 provides:

18 (a) A lawyer shall not knowingly:

19 (1) make a false statement of fact or law to a tribunal or fail to correct a false statement of material
20 fact or law previously made to the tribunal by the lawyer;

21 (2) fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer
22 to be directly adverse to the position of the client and not disclosed by opposing counsel; or

23 (3) offer evidence that the lawyer knows to be false. If a lawyer, the lawyer's client, or a witness
24 called by the lawyer, has offered material evidence and the lawyer comes to know of its falsity, the
25 lawyer shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal.
26 A lawyer may refuse to offer evidence, other than the testimony of a defendant in a criminal matter,
that the lawyer reasonably believes is false.

27 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,**
28 **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 JUDICIAL ABUSE OF PROCESS, 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.
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1 (b) A lawyer who represents a client in an adjudicative proceeding and who knows that a person
2 intends to engage, is engaging or has engaged in criminal or fraudulent conduct related to the
3 proceeding shall take reasonable remedial measures, including, if necessary, disclosure to the
4 tribunal.

5 (c) The duties stated in paragraphs (a) and (b) continue to the conclusion of the proceeding, and
6 apply even if compliance requires disclosure of information otherwise protected by Rule 1.6.

7 (d) In an ex parte proceeding, a lawyer shall inform the tribunal of all material facts known to the
8 lawyer that will enable the tribunal to make an informed decision, whether or not the facts are
9 adverse.

American Bar Association, Model Rules of Professional Conduct, Advocate, Rule 3.4

10 A lawyer shall not:

11 (a) unlawfully obstruct another party's access to evidence or unlawfully alter, destroy or conceal a
12 document or other material having potential evidentiary value. A lawyer shall not counsel or assist
13 another person to do any such act;

14 (b) falsify evidence, counsel or assist a witness to testify falsely, or offer an inducement to a witness
15 that is prohibited by law;

16 (c) knowingly disobey an obligation under the rules of a tribunal except for an open refusal based
17 on an assertion that no valid obligation exists;

18 (d) in pretrial procedure, make a frivolous discovery request or fail to make reasonably diligent
19 effort to comply with a legally proper discovery request by an opposing party;

20 (e) in trial, allude to any matter that the lawyer does not reasonably believe is relevant or that will
21 not be supported by admissible evidence, assert personal knowledge of facts in issue except when
22 testifying as a witness, or state a personal opinion as to the justness of a cause, the credibility of a
23 witness, the culpability of a civil litigant or the guilt or innocence of an accused; or

24 (f) request a person other than a client to refrain from voluntarily giving relevant information to
25 another party unless:

26 (1) the person is a relative or an employee or other agent of a client; and

27 (2) the lawyer reasonably believes that the person's interests will not be adversely affected by
28 refraining from giving such information.

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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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NEGLIGENT IIED

1 164. Defendant George Gascón and his co-conspirator County of Los Angeles criminal
2 prosecutors are not entitled to any type, shape, or form of immunity because they all have
3 willfully, knowingly, carelessly, recklessly, wantonly, maliciously, and callously violated
4 American Bar Association, Model Rules of Professional Conduct, Rules 3.3 and 3.4 by
5 recklessly doing all the following between February 24, 2023 and October 31, 2024 in
6 frivolous and unconstitutional Superior Court of California criminal felony case
7 GA114055:

- 8 1. Willfully, knowingly, recklessly, careless, maliciously, wantonly, and callously failing
9 to turn over and disclose a copy of phony LASD-created GoPro video recordings
10 GX010586 and GX010587 that depicted and displayed KING AROGANT shutting
11 off
12 his GoPro camera while wearing different clothing than he had on February 21, 2023.
- 13 2. Willfully, knowingly, recklessly, maliciously, wantonly, and callously failing to turn
14 over and disclose a copy of KING AROGANT's GoPro camera's 256 gigabytes
15 Micro SD card that had on it all original GoPro video recordings recorded by KING
16 AROGANT on February 21, 2023.
- 17 3. Willfully, knowingly, recklessly, carelessly, maliciously, wantonly, and callously
18 failing to turn over stand-alone copies of Jennifer Hutton-Heger's first 911 call.
- 19 4. Willfully, knowingly, recklessly, carelessly, maliciously, wantonly, and callously
20 failing to turn over stand-alone copies of Jennifer Hutton-Heger's second 911 call.
- 21 5. Willfully, knowingly, recklessly, carelessly, maliciously, wantonly, and
22 callously allowing rogue peace officer Billy S. Khounthavong to testify falsely by
23 fabricating 911 audio recording call evidence.
- 24 6. Willfully, knowingly, recklessly, carelessly, maliciously, wantonly, and callously
25 allowing FAKE VICTIM Jennifer Hutton-Heger to testify falsely that she told
26 peace officers Aaron Contreras and Daniel Esqueda that KING AROGANT was
27 brandishing a knife in her home, that they did a reenactment of the knife confront-
28 ation, and that Hutton-Heger still had the knife; all while George Gascón and his

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 JUDICIAL ABUSE OF PROCESS, 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 County of Los Angeles criminal prosecutors knew that there was nothing in the
2 police report about a knife.

- 3
- 4 7. Willfully, knowingly, recklessly, carelessly, maliciously, wantonly, and callously
5 presenting and admitting into the Superior Court of California, County of Los
6 Angeles, Alhambra Superior Court, Department 1 phony LASD-created GoPro
7 video recordings GX010586 and GX010587 on April 4, 2023, April 5, 2023, and
8 February 2, 2024, and then recklessly failing to lodge GoPro video recordings with
9 Department 1, pursuant to California Rules of Court, Rule 2.1040
- 10 8. Willfully, knowingly, recklessly, carelessly, maliciously, wantonly, and callously
11 presenting false evidence and admitting false evidence into a Superior Court of
12 California criminal courthouse in the form of uncertified, unauthenticated,
13 unverified and unattested photocopies of Billy Khounthavon's never-issued search
14 warrant.
- 15 9. Willfully, knowingly, recklessly, carelessly, maliciously, wantonly, and callously
16 allowing rogue and dishonest County of Los Angeles criminal prosecutor Brian
17 MARK Rosenberg to after George Gascón had been electronically served a copy
18 of nearly fifteen-minute original GoPro video recording recklessly present and
19 admit phony LASD-created GoPro video recordings GX010586 and GX010587
20 into Superior Court of California, County of Los Angeles, Alhambra Superior
21 Court, Department 1, on February 2, 2024, depicted and displayed KING
22 AROGANT shutting off his GoPro camera while wearing different clothing than
23 he had on February 21, 2023.
- 24 10. Willfully, knowingly, recklessly, carelessly, maliciously, wantonly, and callously
25 presenting false evidence and admitting false evidence into a Superior Court of
26 California criminal courthouse in the form of uncertified, unauthenticated,
27 unverified and unattested photocopies of Aaron D. Contreras' phony and forged
28 probable cause determination.
11. Willfully, knowingly, recklessly, carelessly, maliciously, wantonly, and callously
failing to turn over detailed County of Los Angeles Sheriff's Department Temple
City CAD report that stated the exact time that FAKE VICTIM Jennifer Hutton-
Heger's first 911 audio recording commenced and the exact time it ended.

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1
2 12. Willfully, knowingly, recklessly, carelessly, maliciously, wantonly, and callously
3 \ failing to and refusing to provide co-counsel Neil Opdahl (SBN # 277596), Carlos
4 Anthony Jackson, Thomas Leo Guzman-Sanchez, Joel Wyenn, and KING AROGANT
5 with a replica copy of all GoPro video recordings stored on the 256 gigabyte SanDisk
6 Micro SD card that was found inside of the original GoPro camera that was illegally
7 seized by County of Los Angeles peace officers on February 21, 2023.

8 13. Willfully, knowingly, recklessly, carelessly, maliciously, wantonly, and callously
9 \ failing to and refusing to provide co-counsel Neil Opdahl (SBN # 277596), Carlos
10 Anthony Jackson, Thomas Leo Guzman-Sanchez, and Joel Wyenn, with immediate
11 access to all audio and video recording evidence uploaded by County of Los Angeles
12 peace officers and criminal prosecutors to Axon Enterprise, Inc.'s evidence.com

13 165. On December 3, 2023, at 5:56 AM KING AROGNAT sent an email to Defendants
14 Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight
15 Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 that included in the body
16 of the email detailed facts that Billy Khounthavong forged a search warrant document
17 and lied in his search warrant that KING AROGANT's GoPro camera would show him
18 committing a felony, and lying in his supplemental police report that his phony and bogus
19 search warrant was issued by a judicial officer presiding in the Pasadena Superior Court.
20 Included in his email in the body of the email were photographs and images of every
21 page of Billy S. Khounthavong's phony and bogus search warrant. Just like Defendants
22 Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight
23 Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10's actions, misconduct,
24 misdeeds, misdoings, and transgressions done willfully, knowingly, carelessly,
25 recklessly, maliciously, and callously to cause harm to KING AROGANT by ignoring his
26 November 28, 2023 email served upon the previously named Defendants. Defendants
27 Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight
28 Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10's actions, misconduct,

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 JUDICIAL ABUSE OF PROCESS, 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 misdeeds, misdoings, and transgressions of willfully, knowingly, carelessly, recklessly,
2 maliciously and callously to cause harm to KING AROGANT by ignoring his December
3 3, 2023 email, did cause substantial harm to KING AROGANT, and more than
4 Defendants' ignorance of KING AROGANT's November 28, 2023 email. The context,
5 detailed facts, and images of all six pages of rogue peace officer Lying Billy S.
6 Khounthavong's phony and bogus search warrant included in the body of KING
7 AROGANT's December 2, 2023, email prove by clear and convincing evidence that
8 Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter
9 Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 received FAIR
10 NOTICE on December 2, 2023, that rogue peace officer Billy Khounthavong fabricated
11 lies on a search warrant by stating on the search warrant that KING AROGNAT's GoPro
12 camera would show him making a criminal threat, and fabricating his supplemental
13 police report that his phony search warrant was issued by Superior of California, County
14 of Los Angeles, Pasadena Superior Court on February 22, 2023. Further, KING
15 AROGANT was held to answer not because his GoPro camera video recordings show
16 him making a criminal threat. KING AROGANT was rather held because FAKE
17 VICTIM Jennifer Hutton-Heger testified falsely that KING AROGANT threatened to kill
18 her, and KING AROGANT was held to answer because Defendant George Gascón and
19 his co-conspirators employed by the County of Los Angeles District Attorney's Office
20 willfully, knowingly, carelessly, recklessly, maliciously, and callously presented to the
21 Superior Court of California, County of Los Angeles, Alhambra Superior Court,
22 Department an entirely fabricated case-in-chief that KING AROGANT shut off his
23 GoPro camera between 10:06 AM to 10:13 AM, threatened to kill Hutton-Heger, and
24 then after threatening to kill her and brandishing a knife in her kitchen turns his GoPro
25 camera back on and starts recording a new GoPro video recording. Roge and dishonest
26 County of Los Angeles peace officer Billy S. Khounthavong's original sworn affidavit

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 JUDICIAL ABUSE OF PROCESS, 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 statements that KING AROGANT's GoPro camera would show him committing a felony
2 by making a criminal threat to Jennifer Hutton-Heger on February 21, 2023, proves by
3 that County of Los Angeles Sheriff's Department and County of Los Angeles District
4 Attorney's Office made-up fabricated case-in-chief and wholly created their preliminary
5 hearing's case-in-chief that KING AROGANT shut off his GoPro camera between 10:06
6 AM and 10:13 AM , and that during that time-frame threatened to kill Jennifer Hutton-
7 Heger. Because unlike Billy Khounthavong's fabricated statements on his search warrant
8 affidavit that KING AROGANT's GoPro camera would show him committing a felony
9 by making a criminal threat to Jennifer Hutton'Heger on February 21, 2023. None of the
10 County of Los Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's
11 Southern California High Tech Task Force and County of Los Angeles District
12 Attorney's Office's presented GoPro video recordings recklessly played at the
13 preliminary hearing on April 4, 2023 and April 5, 2023 showed KING AROGANT doing
14 anything but exercising his United States Constitutional First Amendment rights to his
15 freedom of speech. Moreover, Defendant Gascón knew that Brian MARK Rosenberg
16 had willfully, knowingly, carelessly, recklessly, maliciously, and callously violated
17 California Evidence Code § 1522 by recklessly presenting to the Superior Court of
18 California, County of Los Angeles, Alhambra Superior Court, Department 1 manipulated
19 copies of KING AROGANT's original GoPro video recordings that were stored on his
20 camera's 256 gigabytes SanDisk Micro SD card. Pursuant to Section 1522 Defendant
21 George Gascón, Brian MARK Rosenberg, and his County of Los Angeles District
22 Attorney's office co-conspirators were prohibited from presenting phony LASD-created
23 GoPro video recordings GLO10586 and GX010587 because the original GoPro video
24 recordings had been in Gascón and his co-conspirators' possession since County of Los
25 Angeles Sheriff's Department and Lying Billy Khounthavong confiscated and illegally
26 seized KING AROGANT's GoPro camera and its 256 gigabytes SanDisk Micro SD card.

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 JUDICIAL ABUSE OF PROCESS, 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 Lastly, rogue County of Los Angeles peace officer Billy S. Khounthavong never stated
2 as alleged in his in his fabricated search warrant affidavit that KING AROGANT's
3 GoPro camera show him shutting it off between 10:06 AM and 10:13 AM. The absence
4 of the above statements further proves by clear and convincing evidence that Brian
5 MARK Rosenberg, County of Los Angeles Sheriff's Department, George Gascón, and
6 County of Los Angeles District Attorney's Office willfully, knowingly, carelessly,
7 recklessly, maliciously, and callously fabricated their preliminary hearing case-in-chief
8 that KING AROGANT shut off his GoPro camera between 10:06 AM and 10:13 AM in
9 furtherance of Gascon and his co-conspirators secret meeting, secret plan, and conspiracy
10 to recklessly frame KING AROGANT for a serious and violent felony they knew he
11 never committed. The absence of the above statements further proves by clear and
12 convincing evidence that Brian MARK Rosenberg, County of Los Angeles Sheriff's
13 Department, George Gascón, and County of Los Angeles District Attorney's Office
14 willfully, knowingly, carelessly, recklessly, maliciously, and callously created and made-
15 up their preliminary hearing case-in-chief that KING AROGANT shut off his GoPro
16 camera between 10:06 AM and 10:13 AM in furtherance of Gascon and his co-
17 conspirators secret meeting, secret plan, and conspiracy to recklessly frame KING
18 AROGANT for a serious and violent felony they knew he never committed.

19
20 166. On April 4, 2023, April 5, 2023, and finally on February 2, 2024, Defendant
21 George Gascón, Brian MARK Rosenberg, and all of his other County of Los Angeles
22 criminal prosecutor co-conspirators willfully, knowingly, carelessly, recklessly,
23 maliciously, and callously supported their preliminary hearing case-in-chief by recklessly
24 presenting and admitting into the Superior Court of California, County of Los Angeles,
25 Alhambra Superior Court, Department 1 falsified, fabricated, and manipulated LASD-
26 created GoPro video recordings GX010586 and GX010587 that depicted and displayed

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 JUDICIAL ABUSE OF PROCESS, 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 KING AROGANT shutting of his GoPro camera on while wearing different clothing than
2 he had on February 21, 2023. See now KING AROGANT's December 2, 2023 email sent
3 to Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta,
4 Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 attached as
5 Verified Appendix of Exhibits, Exhibit _____. Moreover, while in Billy Khounthavong's
6 falsified supplemental police report, he stated that his phony and bogus search warrant.
7 The probable cause warrant and search warrant procedures of and in Superior Court of
8 California, County of Los Angeles criminal courthouses prove by clear and convincing
9 evidence that lying, racist, and biased Superior Court of California judicial officer Suzette
10 Clover never issued Billy Khounthavong's phony, bogus, and judicially forged search
11 warrant on February 21, 2023. Suzette Clover should be locked-up in a federal detention
12 center and then federal prison for creating a fabricated minute order in early October
13 2023 stating that she did issue Lying Billy Khounthavong's phony, bogus, and judicially
14 forged search warrant that does not even bear the Superior Court of California seal! In a
15 Superior Court of California, County of Los Angeles criminal courthouse, a probable
16 cause warrant, arrest warrant, or search warrant cannot be issued without the requesting
17 peace officer first completing first completing Superior Court of California, County of
18 Los Angeles, Countywide Warrant System Initial Case Filing Form, LASC CRIM 126
19 Revised January 2020, For Mandatory Use. At the top of this mandatory criminal court
20 form it states the following:

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

23 **Search Warrant Number _____**
24

25
26 At the bottom left side of the Countywide Warrant System Initial Case Filing form the

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 JUDICIAL ABUSE OF PROCESS, 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, HED, & NEGLIGENT HED**

1 following black-lettered text is printed:
2
3

4 **LASC CRIM 126 Rev., 01/20**
5 **For Mandatory Use**
6

7 167. In frivolous and unconstitutional Superior Court of California, County of Los
8 Angeles, Alhambra Superior Court case GA114055 mandatory criminal form CRIM 126
9 does not exist for Billy Khounthavong's phony, bogus, and judicially forged search
10 warrant.

11 168. In frivolous and unconstitutional Superior Court of California, County of Los
12 Angeles, Alhambra Superior Court case GA114055 mandatory criminal form CRIM 126
13 does not exist for Aaron D. Contreras' phony, bogus, and judicially forged probable
14 cause determination.
15

16 169. Additionally, no where written or printed on Lying Billy Khounthavong's search
17 warrant is a search warrant number. Similarly, Superior Court of California, County of
18 Los Angeles, Pasadena Superior Court has no records of a search warrant number for
19 Billy Khounthavong's phone search warrant. In early October 2023 when racist, biased,
20 lying, and corrupt created her fabricated and fraud upon the court minute order she did
21 not reference any search warrant number. Billy Khounthavong did not reference any
22 search warrant number in his fabricated and falsified supplemental police report. When
23 rogue County of Los Angeles peace officer Lying Billy Khounthavong falsified his
24 bogus and phony search warrant return seven months later the Pasadena Superior Court
25 received the document but refused to file it with the Superior Court of California, County
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 JUDICIAL ABUSE OF PROCESS, 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 of Los Angeles, Pasadena Superior Court for all the following reasons:

- 2
- 3 1. Rogue peace officer Billy Khounthavong's phony, bogus, and judicially forged
- 4 search warrant was required to be returned in ten days pursuant to California
- 5 Penal Code § 1534.
- 6 2. The Pasadena Superior Court criminal clerk accepting Billy Khounthavong's
- 7 forged search warrant return could not find any records of Billy Khounthavong's
- 8 phony and bogus search warrant ever being filed and issued by the Pasadena
- 9 Superior Court.
- 10 3. The forged and bogus search warrant and search warrant return submitted to
- 11 Pasadena Superior Court in September 2023 had no search warrant number
- 12 written on them, nor did the Pasadena Superior Court have any court records of a
- 13 search warrant number or a February 22, 2023, minute order stating that Lying
- 14 Billy Khounthavong's was granted by racist Suzette Clover.
- 15 4. The Pasadena Superior Court criminal clerk accepting Billy Khounthavong's forged
- 16 search warrant return found no court records that showed that the mandatory
- 17 Superior Court of California, County of Los Angeles, Countywide Warrant System
- 18 Initial Case Filing Form had been completed and filed with the Pasadena Superior
- 19 Court in frivolous criminal case GA114055.

20 See now Lying Billy Khounthavong's Superior Court of California, County of Los

21 Angeles, Pasadena Superior Court bogus, phony, and judicially forged search warrant

22 return attached as Verified Appendix of Exhibits, Exhibit _____.

23 170. The absence of a search warrant being filed, the absence of search warrant number

24 combined with the absence of a filed Superior Court of California, County of Los

25 Angeles, Countywide Warrant System, Initial Case Filing Form, CRIM 126 (for

26 Mandatory Use), proves by clear and convincing evidence that Lying Billy

27 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,**

28 **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 JUDICIAL ABUSE OF PROCESS, 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 Khounthavong's phony, bogus, no search warrant number, and judicially forged search
2 warrant was never issued and never filed in the Superior Court of California, County of
3 Los Angeles, Pasadena Superior Court in February 2023, and thus, Defendant George
4 Gascón, County of Los Angeles Sheriff's Department peace officers willfully, recklessly,
5 carelessly, maliciously, wantonly, and callously violated KING AROGANT's United
6 States Fourth Amendment Search and Seizure Clause constitutional civil rights by
7 recklessly and maliciously confiscating and searching KING AROGANT's GoPro
8 camera and GoPro camera's SanDisk 256 gigabytes Micro SD card without any shape,
9 form, type of PROBABLE CAUSE. Including but not limited to Lying Billy
10 Khounthavong, Leo Kong Fa Lo, Richard Lewis, and Defendant GoPro Manipulator's
11 Supervisor, Sergeant Flores.

12
13 171. Since at least February 20, 2023, the policy and procedures of all Superior Court of
14 California criminal courthouses and courtrooms require that after the search warrant
15 request form is completed along with the peace officer's declaration, a judicial minute
16 order is created stating and documenting the judicial officer's actions taken on the search
17 warrant request. Dishonest and corrupt State of California judicial officer Suzette Clover
18 Could not have issued and approved rogue peace officer Billy Khounthavong's phony,
19 bogus, and judicially forged search warrant without first creating a minute order court
20 record documenting and stating what action the court took on Billy Khounthavong's
21 search warrant request. This is true whether the peace officer's search warrant request
22 was submitted to a Superior Court manually in person or submitted electronically by a
23 peace officer from a computer. The peace officer's method of submission of his or her's
24 search warrant request to a Superior Court of California does not alter or change a
25 Superior Court of California's obligation, duty, and requirement to create a minute order
26 and court record of what action the judicial officer took on the peace officer's search

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 JUDICIAL ABUSE OF PROCESS, 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 warrant or arrest warrant request. Additionally, in all Superior Court of California,
2 County of Los Angeles criminal courthouses a judicial officer cannot consider and take
3 action on a search warrant request until he or she has received all the following from the
4 peace officer requesting a search warrant or arrest warrant:

5 1. A completed and signed Countywide Warrant System, Initial Case Filing Form,
6 CRIM 126

7
8 2. A declaration of peace officer requesting search warrant or

9
10 172. In the frivolous Superior Court of California, County of Los Angeles, Alhambra
11 Superior Court case GA115055. Located nowhere inside the criminal case file is there a
12 minute order from February 2023 documenting and stating what action lying Superior
13 Court of California judicial officer Suzette Clover took on Billy Khounthavong's search
14 warrant request on February 22, 2023.

15
16 173. The absence of a Suzette Clover minute order and filed LASC CRIM 126 form
17 proves by clear and convincing evidence that LYING, RACIST, prejudiced, biased, and
18 covering-for-a-cop judicial officer Suzette Clover never took any action on Billy
19 Khounthavong's February 22, 2023 search warrant request because both Pasadena
20 Superior Court and Alhambra Superior Court have no court records that Suzette Clover
21 never took any action on Billy Khounthavong's February 22, 2023 search warrant request
22 because both Pasadena Superior Court and Alhambra Superior Court have no court
23 records that Suzette Clover's courtroom created a minute order in February 2023
24 regarding what action she took on Billy Khounthavong's search warrant request.

25
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 JUDICIAL ABUSE OF PROCESS, 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**

1 174. On information and belief Defendants Gavin Christopher Newsom, Leah Tamu
2 Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George
3 Gascón, and DOES 1-10, that were emailed on December 2, 2023, knew with 100%
4 certainty that Billy S. Khounthavong February 22, 2023 search warrant was bogus and
5 phony because it did not have a search warrant number on it.

6
7 175. On information and belief emailed Defendants Gavin Christopher Newsom, Leah
8 Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George
9 Gascón, and DOES 1-10 knew with 100% certainty after reading and reviewing KING
10 AROGANT's December 2, 2023 email that Billy Khounthavong's search warrant was
11 bogus, phony, and judicially forged because it did not have a search warrant number on it
12 and because it was not accompanied by the mandator Countywide Warrant System Initial
13 Filing Form.

14
15 176. Arbitrarily clothed and covered with the color of law Defendants Gavin
16 Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran,
17 Dennis L. Beck Jr., George Gascón, and DOES 1-10 foolishly and stupidly thought that
18 they would get away scot-free with willfully, carelessly, maliciously, recklessly,
19 wantonly, and callously ignoring KING AROGANT's very serious November 28, 2023
20 and December 2, 2023 emails.

21
22 177. Plaintiff KING AROGANT hereby restates, realleges, reiterates, reincorporates,
23 and incorporates by reference the previous paragraphs 1=176.

24
25 178. On December 11, 2023, KING AROGANT sent an email to Defendants Gavin
26 Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran,

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 Dennis L. Beck Jr., George Gascón, and DOES 1-10 that included in the body of the
2 email detailed facts that California state regulated and funded County of Los Angeles
3 Sheriff's Department's Fraud and Cyber Crime Bureau's Southern California High Tech
4 Task Force peace officers had no a legal authority and no legal authorization to put their
5 dirty and tainted hands on KING AROGANT's GoPro camera because nothing in their
6 peace officer job duties or job descriptions gave them legal authorization to investigate a
7 criminal threats investigation. KING AROGANT electronic mail served upon Defendants
8 subject line read:

9
10 AROGANT HOLLYWOOD v. state of california, united states, county
11 of los angeles, city of south pasadena, city of arcadia, et al [SECOND
12 EMAIL] PHONY SEARCH WARRANT THAT WAS USED TO FRAME
13 AROGANT HOLLYWOOD FOR VIOLATING CALIFORNIA PENAL CODE
14 SECTION 422(a) [BILLY KHOUNTHAVONG MAKES DEREK CHAUVIN
15 LOOK LIKE A SAINT!] [NO CAP @@] [OFFICIAL COMPLAINT
16 AGAINST BILLY KHOUNTHAVONG AND BRIAN MARK ROSENBERG
17 FOR PRESENTING THE COURT AND MALICIOUSLY PROSECUTING
18 AROGANT HOLLYWOOD BASED ON A COUNTERFEIT AND MAKE
19 BELIEVE CRIMINAL SEARCH WARRANT. [OFFICIAL COMPLAINT,
20 EMAIL 2, PART 2 ONLY] NO CAP @@]

21
22 KING AROGANT stated in his detailed email that it was foul play for rogue peace
23 officer Billy Khounthavong to send KING AROGANT's GoPro camera to County of Los
24 Angeles Sheriff's Department's Fraud and Cyber Crime Bureau's Southern California
25 High Tech Task Force peace officers because they were not authorized by law to
26 investigate criminal threats allegations and accusations. And thus, KING AROGANT's

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 JUDICIAL ABUSE OF PROCESS, 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 entirely exculpatory GoPro camera was illegally sent to Southern California High Tech
2 Task Force peace officers so that they could all commit the crime of willfully, knowingly,
3 careless, recklessly, maliciously, and callously violating California Government Code §
4 6200 by recklessly and deliberately creating phony LASD-created GoPro video
5 recordings GX010586 and GX010587, and then recklessly presenting and admitting these
6 very same phony and bogus LASD-created GoPro video recordings in the Superior Court
7 of California, County of Los Angeles, Alhambra Superior Court that depicted and
8 displayed KING AROGANT wearing a shorts and shutting his GoPro camera with a bare
9 right arm while KING AROGANT's REAL GoPro video recordings, LASD peace officer
10 bodycams, and Jennifer Hutton-Heger's first 911 call prove by clear and convincing
11 evidence that KING AROGANT was wearing baggy long pants and a long-sleeved coat
12 on February 21, 2023. The context, detailed facts, and attached documents such as the
13 Judicial Council of California's Trial Court Records Manual (Revised on June 4, 2024),
14 proves by clear and convincing evidence that Defendants Gavin Christopher Newsom,
15 Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr.,
16 George Gascón, and DOES 1-10 all received FAIR NOTICE on December 11, 2023 that
17 County of Los Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's
18 Southern California High Tech Task Force peace officers were illegally in possession of
19 KING AROGANT's GoPro camera, and also Defendants received FAIR NOTICE that
20 while these Southern California High Tech Task Force and Defendant Leo Ka Fong Lo
21 were in illegally in possession of KING AROGANT's GoPro camera and original video
22 recordings stored on KING AROGANT's GoPro camera these rogue peace officers and
23 Defendant Leo Ka Fong Lo willfully, knowingly, recklessly, maliciously, wantonly, and
24 callously created phony and bogus GoPro video recordings GLO10586 and GX010587
25 that were both recklessly presented and admitted inside a criminal Superior Court to
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 JUDICIAL ABUSE OF PROCESS, 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 frame KING AROGANT for a serious and violent felony crime that they all knew that
2 KING AROGANT had never committed. See now KING AROGANT's December 11,
3 2023 email attached as Exhibit _____ of Verified Appendix of Exhibits, that was sent
4 to Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta,
5 Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10.

6
7 179. Emailed Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert
8 Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-
9 10 all received FAIR NOTICE that County of Los Angeles Sheriff's Department's Fraud
10 and Cyber Crime Bureau's Southern California High Tech Task Force peace officers and
11 Defendant Leo Ka Fong Lo recklessly framed KING AROGANT for a serious and
12 violent felony they all knew he never committed by these peace officers willfully,
13 recklessly, carelessly, maliciously, and callously creating phony and bogus GoPro video
14 recordings GX010586 and GX010587, and then recklessly presenting and admitting these
15 phony LASD-created GoPro video recordings inside Superior Court of California,
16 County of Los Angeles, Alhambra Superior Court, Department 1. Yet, as of October 31,
17 2024 Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter
18 Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 have all willfully,
19 carelessly, recklessly, maliciously, wantonly, and callously with under color of law
20 deliberate indifference to the federally protected civil rights of KING AROGANT,
21 recklessly failed to do any of the following for nearly twelve consecutive months after
22 they had all been given FAIR NOTICE, and received FAIR NOTICE:

- 23 1. Respond to KING AROGANT's December 11, 2023 email.
24
25
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 2. Request that County of Los Angeles Sheriff's Department Fraud and Cyber Crimes
2 Bureau's Southern California High Tech Task Force and Leo Ka Fong Lo
3 immediately turn over and disclose copies of phony and bogus LASD-created GoPro
4 video recordings GX010586 and GX010587 that were recklessly admitted and
5 presented at the rigged preliminary hearing conducted on April 4, 2023, and April 5,
6 2023.
- 7 3. Launch an investigation into all KING AROGANT's December 11, 2023 emailed
8 allegations and accusations that claimed County of Los Angeles Sheriff's Department
9 specialized peace officers willfully, recklessly, carelessly, maliciously, wantonly, and
10 callously created phony GoPro video recordings GX010586 and GX010586 while KING
11 AROGANT's GoPro camera was illegally in their possession and then recklessly
12 presented and admitted phony GoPro video recordings GX010586 and GX010587 to
13 recklessly frame KING AROGANT for a serious and violent felony crime they all knew
14 he never committed.

15 180. On information and belief Defendants Gavin Christopher Newsom, Leah Tamu
16 Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-
17 10 between November 28, 2023, and October 31, 2023, all willfully, carelessly,
18 recklessly, maliciously, wantonly, and callously had a meeting of minds among
19 themselves and each other, and with Defendant George Gascón and other named and
20 unnamed County of Los Angeles District Attorney's Office employees, attorneys, and
21 criminal prosecutors to willfully, recklessly, carelessly, maliciously, wantonly, and
22 callously violate KING AROGANT's Fourth and Fourteenth Amendment United States
23 constitutional civil rights, and all previously named Defendants did conspire to recklessly
24 violate KING AROGANT's federally protected constitutional civil rights by doing all the
25 aforementioned and by staying silent while Defendants were condoning, tolerating,
26 acquiescing, consenting to, overlooking, permitting, and otherwise continuing to allow
27 County of Los Angeles criminal prosecutors to frame KING AROGANT by tainting,
28 tampering with, altering, fabricating, and otherwise manipulating KING AROGANT's
exculpatory GoPro video recordings GX010586 and GX010587, and then recklessly
presenting and admitting them into Superior Court of California, County of Los Angeles,

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 Alhambra Superior Court, Department 1 to frame KING AROGANT for a serious and
2 violent felony that all emailed Defendants knew with 100% certainty that KING
3 AROGANT never committed.

4
5 181. Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres
6 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10's
7 willful, knowing, reckless, wanton, malicious, and callous illegal acts, actions,
8 misconduct, misdeeds, misdoings, and transgressions of since November 28, 2023
9 recklessly violating California Government Code § 6200, proves by clear and convincing
10 evidence that they all were given FAIR NOTICE and received FAIR NOTICE, and thus,
11 disqualified all the above-stated Defendants from obtaining any shape, form, or type of
12 judicial, electoral, or prosecutorial immunity.

13
14 182. Plaintiff KING AROGANT hereby restates, realleges, reiterates, reincorporates,
15 and incorporates by reference all previous paragraphs 1-181.

16
17 183. On January 15, 2024, KING AROGANT forwarded the same November 23, 2023
18 email that contained detailed facts and allegations that rogue County of Los Angeles
19 prosecutors Brian MARK Rosenberg and Victor Manuel Rodriguez and County of Los
20 Angeles willfully, recklessly, carelessly, wantonly, maliciously, and callously violated
21 KING AROGANT's constitutional civil rights by recklessly presenting and admitting
22 into Superior Court of California, County of Los Angeles, Alhambra Superior Court,
23 Department 1 phony and bogus LASD-created GoPro video recordings GX010586 and
24 GX010587 that depicted and displayed KING AROGANT shutting off his GoPro camera
25 inside of the now deceased FAKE VICTIM Jennifer Hutton-Heger's home on February
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 JUDICIAL ABUSE OF PROCESS, 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 21, 2023 wearing different clothing than he had on February 21, 2023. See KING
2 AROGANT's January 15, 2024 email that was sent to Defendants Gavin Christopher
3 Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L.
4 Beck Jr., George Gascón, and DOES 1-10 attached as Exhibit ___ of KING
5 AROGANT's Verified Appendix of Exhibits. All emailed Defendants were given FAIR
6 NOTICE and received FAIR NOTICE that County of Los Angeles criminal prosecutors,
7 County of Los Angeles District Attorney's Office, County of Los Angeles Sheriff's
8 Department, and County of Los Angeles had recklessly frame KING AROGANT for a
9 serious and violent felony they all knew KING AROGANT never committed. Yet as of
10 October 31, 2024, Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert
11 Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-
12 10 have all willfully, recklessly, carelessly, maliciously, wantonly, and callously with
13 under color of law deliberate indifference to the federally protected civil rights of KING
14 AROGANT recklessly failed to do any of the following for nearly twelve consecutive
15 months after the above-stated Defendants were given FAIR NOTICE and received FAIR
16 NOTICE:

- 17 1. Respond to KING AROGANT's November 28, 2023 email.
- 18 2. Request that County of Los Angeles criminal prosecutors involved with frivolous criminal
19 case GA114055 turn over and disclose to them all sixteen GoPro video recordings
20 recklessly presented at the preliminary hearing held on April 4, 2023 and April 5, 2023,
21 and especially phony LASD-created GoPro video recordings GLO10586 and GLO10587
22 that depicted and displayed KING AROGANT shutting off his GoPro camera with a bare
23 right arm.
- 24 3. Immediately request that County of Los Angeles rogue, racist, biased, and dishonest
25 criminal prosecutors Brian MARK Rosenberg and Victor Manuel Rodriguez's recklessly
26 falsified evidence presented inside of the Superior Court of California, County of Los
27 Angeles, Alhambra Superior Court, Department 1 on April 4, 2023 and April 5, 2023
28 be immediately turned over and disclosed to George Gascón, the Office of George
Gascón, and the office of Attorney General Robert Bonta.

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 4. Launch an investigation into all KING AROGANT's November 28, 2023 emailed
2 allegations and accusations that claimed County of Los Angeles District Attorney's
3 Office criminal prosecutors and investigators recklessly falsified evidence inside of a
4 Superior Court of California Superior Court criminal courtroom.
- 5 5. Request that Victor Manuel Rodriguez and MARK Rosenberg immediately turn over and
6 disclose impeaching and phony LASD-created GoPro video recordings GX010586 and
7 GX010587.
- 8 6. Request that rogue, racist, biased, and dishonest involved County of Los Angeles
9 criminal prosecutors immediately turn over and disclose copies of impeaching phony
10 LASD-created GoPro video recordings GX010586 and GX010587 in compliance with
11 County of Los Angeles District Attorney's Office's Legal Policies and Procedures,
12 Chapter 14.
- 13 7. Request that Victor Manuel Rodriguez and MARK Rosenberg immediately turn over and
14 disclose all sixteen GoPro video recordings announced, presented, and admitted into
15 Superior Court of California, County of Los Angeles, Alhambra Superior Court,
16 Department 1 on April 4, 2023 and April 5, 2023, and testified to by rogue peace officer
17 Lying Billy Khounthavong on April 5, 2023.
- 18 8. Request that Victor Manuel Rodriguez and MARK Rosenberg immediately turn over and
19 Disclose a Hardcopy of a Detailed CAD report showing the exact time each of Jennifer
20 Hutton-Heger's first and second 911 audio recordings commenced and ended.

17 184. On information and belief, Defendants Gavin Christopher Newsom, Leah Tamu
18 Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-
19 10 between November 28, 2023, and October 31, 2024, have all had a meeting of minds
20 amongst each other and Defendant George Gascón and other named and unnamed
21 County of Los Angeles criminal prosecutors, employees, peace officers, and investigators
22 to recklessly violate the United States Constitution, and KING AROGANT's Fourth and
23 Fourteenth Amendment constitutional civil rights, and all named Defendants above and
24 herein did conspire amongst each other to violate KING AROGANT's federally
25 protected constitutional rights by doing all the aforementioned, and by staying silent
26 while condoning, tolerating, consenting to, overlooking, permitting, and otherwise

27 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,**
28 **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 JUDICIAL ABUSE OF PROCESS, 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 continuing to allow County of Los Angeles criminal prosecutors, employees, peace
2 officers, and investigators to frame KING AROGANT by tainting, tampering with,
3 altering, fabricating, and otherwise manipulating his exculpatory GoPro video recordings
4 evidence.

5
6 185. Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres
7 Bonta, George Gascón, Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-10 all
8 willfully, recklessly, maliciously, wantonly, and callously violated the United States
9 Constitution, KING AROGANT'S Fourth Amendment Search and Seizure Clause
10 constitutional civil rights by recklessly ignoring his emails served upon them on
11 November 28, 2023, December 2, 2023, December 11, 2023, and January 15, 2024, and
12 by recklessly failing to launch an investigation that would have aided and assisted KING
13 AROGANT with overturning his wrongful, illegal, and unconstitutional felony
14 conviction.

15
16 186. Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres
17 Bonta, George Gascón, Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-10 all
18 committed reckless under color of law FRAUD by their, through their, and when their
19 illegal acts, actions, misconduct, misdeeds, and transgressions of them all hiding from,
20 concealing from, failing to disclose, failing to inform, and otherwise tell Superior Court
21 of California, County of Los Angeles, Alhambra Superior Court, Department 1 that on
22 November 28, 2023, and January 15, 2024, that they were all served a nearly fifteen-
23 minute GoPro video recording that proved by clear and convincing evidence that KING
24 AROGANT did not make a criminal threat to Jennifer Hutton-Heger on February 21,
25 2023, and was factually innocent, emails that were electronically served upon Defendants
26 Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, George Gascón,

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

1 Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-10 on November 28, 2023 and
2 January 15, 2024. And Defendants Gavin Christopher Newsom, Leah Tamu Wilson,
3 Robert Andres Bonta, George Gascón, Peter Dwight Halloran, Dennis L. Beck Jr., and
4 DOES 1-10 willfully, recklessly, maliciously, carelessly, and callously violated the
5 United States Constitution and KING AROGANT's Fourteenth Amendment Due Process
6 Clause constitutional civil rights by them recklessly hiding from, concealing from, failing
7 to disclose, failing to tell, and otherwise inform the Superior Court of California, County
8 of Los Angeles, Alhambra Superior Court, Department 1 that they had a legal duty and
9 legal obligation to assist and aid KING AROGANT with overturning his wrongful,
10 illegal, and unconstitutional criminal felony case pursuant to State Bar of California
11 Rules 3.3 Candor Toward Tribunal, 3.4 Fairness to Opposing Party and Counsel, and 3.8
12 Special Responsibilities of a Prosecutor, California Business and Professions Code §
13 6068, and American Bar Association, Model Rules of Professional Conduct, Rules 3.1
14 Meritorious Claims and Contentions, 3.3 Candor toward the Tribunal, Rule 3.4 Fairness
15 to Opposing Party and Counsel, and Rule 3.8 Special Responsibilities of a Prosecutor.
16 Which was reckless under color of law FRAUD by defendants doing, by them using, by
17 them employing, and otherwise engaging in illusionary and manipulated illegal acts of
18 concealment, deceit, conspiracies, and corruption to gain an unfair, unlawful,
19 unconstitutional, and unjust advantage over KING AROGANT.

20
21 187. On December 18, 2023, in response to KING AROGANT's email to County of
22 Los Angeles Sheriff's Department sheriff Robert Luna (emailed at rluna@lasd.org), the
23 department's Risk Management Bureau responded to KING AROGANT's email that
24 Billy Khounthavong forged a bogus search warrant by refusing to turn over a copy of it.
25 In fact, LASD's response was even signed by Shawnee N. Hinchman, a captain. See now
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 LASD Risk Management Bureau's response to KING AROGANT's claims that Billy
2 Khounthavong judicially forged a bogus search warrant in late February 2023, attached
3 as Exhibit ____, of KING AROGANT's Verified Appendix of Exhibits, and also attached
4 hereto below.

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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, & NEGLIGENCE IED**

OFFICE OF THE SHERIFF



COUNTY OF LOS ANGELES

HALL OF JUSTICE

ROBERT G. LUNA, SHERIFF

December 12, 2023

Arogant Hollywood
1308 East Colorado Boulevard
Pasadena, California 91106
aroganthollywoodgenius@gmail.com

Dear Mr. Hollywood:

PUBLIC RECORDS ACT REQUEST - #23-2531MI

This letter is in response to your request for records under the California Public Records Act dated and received by the Los Angeles County Sheriff's Department (LASD), Public Records Act Unit on November 29, 2023.

In your request you are seeking the following:

1. A copy of any and electronic mail documents that LASD and Billy Khounthavong created while submitting alleged electronic search warrant to racist and prejudice Judge Suzette Clover, who presides over Pasadena Superior Court, Department F.
2. Any and all LASD Temple City Police file records of Billy Khounthavong's make believe search warrant that was alleged to had been issued on February 22, 2023, at 12:11 PM.
3. Any and all Superior Court of California, Pasadena Superior Court paper form records of Billy Khounthavong's bogus search warrant that were physically mailed to LASD from the Pasadena Superior Court after issuance of Khounthavong's search warrant.
4. Any and all Superior Court of California, Pasadena Superior Court, electronic records of Billy Khounthavong's bogus search warrant that were electronically sent to LASD from the Pasadena Superior Court after issuance or Khounthavong's search warrant.
5. A copy of any and all LASD Temple City paper form search warrant affidavits that were submitted to the Pasadena Superior Court between February 20, 2023, and February 23, 2023.
6. A copy of any and all LASD Temple City electronic form search warrant affidavits that were submitted to the Pasadena Superior Court between February 20, 2023, and February 21, 2023.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

A Tradition of Service
— Since 1850 —

Arogant Hollywood
PRA #23-2631MI

-2-

December 12, 2023

Response to No. 1: LASD is unable to provide records responsive to your request. The records sought constitute investigatory files, which are exempt from disclosure under Government Code sections 7923.600-7923.625 and 7922.000.

Response to Nos. 2 and 6: LASD is unable to provide you with search warrant information as these documents are prohibited from disclosure under Government Code sections 7923.600-7923.625 and 7927.705 as well as Evidence Code section 1040. Warrants are exempt due to privilege as these records are used exclusively by authorized law enforcement personnel via the California Justice Information System. Unauthorized disclosure is punishable under Penal Code section 502 et seq.

Under California Penal Code section 1534, executed search warrants are judicial records and may be obtained directly from the court. In an effort to assist you, you may choose to contact the court where the warrant was issued. For the Los Angeles County Superior Court contact them directly or visit their website at <http://www.lacourt.org/> for more details.

Response to Nos. 3 and 4: Please note, LASD is not the proper entity through which you should seek the information you wish to obtain. In an effort to assist you; however, you may elect to contact the court directly since courts are the custodian of such records. For the Los Angeles County Superior Court, contact them directly or visit their website at <http://www.lacourt.org/> for more details.

Response to No. 6: Under Penal Code section 1534, executed search warrants ("documents and records of the court relating to the warrant," including the requested affidavit and statement of probable cause) are judicial records and may be obtained directly from the court. In an effort to assist you; however, you may choose to contact the court where the warrant was issued. For the Los Angeles County Superior Court, contact them directly or visit their website at <http://www.lacourt.org/> for more details.

Also, please note that under the California Public Records Act, the Public Records Act (PRA) Unit does not release "certified" copies of records.

If you have any questions, please contact the Public Records Act Unit via email at DiscoveryUnitPRArequests@lasd.org or phone at (323) 890-5050.

Sincerely,

ROBERT G. LUNA, SHERIFF



1 188. Sent from his blacklawgenius@gmail.com email address and his
2 blacklawcrusader@gmail.com email address on February 28, 2024. KING AROGANT
3 sent an email to Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert
4 Andres Bonta, George Gascón, Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-
5 10 in which the email subject line read:

6 **POST-CONVICTION DEMAND FOR THE PEOPLE AND LASD TO TURN**
7 **OVER AND DISCLOSE PHONY LASD-CREATED GOPRO VIDEO**
8 **RECORDINGS GX010586 AND GX010587 (AROGANT HOLLYWOOD,**
9 **et al v. ricardo garcia, et al)**

10
11 In the body of KING AROGANT's February 28, 2024, detailed email, he alleged that
12 County of Los Angeles District Attorney's Office deputy district attorney Brian MARK
13 Rosenberg recklessly played phony LASD-created GoPro video recording GX010586
14 that depicted and displayed KING AROGANT shutting off his GoPro camera while
15 wearing a tank top and dark shorts. KING AROGANT stated in his email to Defendants
16 Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, George Gascón,
17 Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-10 that while phony LASD-
18 created GoPro video recording GX010586 depicted and displayed KING AROGANT
19 shutting off his GoPro camera with a bare and naked right arm, FAKE VICTIM Jennifer
20 Hutton-Heger can be heard in her first 911 audio recording telling the dispatcher that
21 KING AROGANT was wearing baggy pants and long-sleeved shirt. KING AROGANT
22 next pointed out in his February 28, 2024 email that in County of Los Angeles Sheriff's
23 Department Temple City police bodycam recordings, he is seen wearing a long-sleeved
24 shirt. Lastly, KING AROGANT told all emailed Defendants in his email to them that in
25 the phony LASD-created GoPro video recording GX010586 no sound can be heard
26 coming from the bogus GoPro video recordings whatsoever, yet in KING AROGANT's

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 JUDICIAL ABUSE OF PROCESS, 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 REAL GoPro video recordings sound could be heard. Near the end of his February 28,
2 2024 email to Defendants Defendants Gavin Christopher Newsom, Leah Tamu Wilson,
3 Robert Andres Bonta, George Gascón, Peter Dwight Halloran, Dennis L. Beck Jr., and
4 DOES 1-10 KING AROGANT demanded that they all turn over copies of phony LASD-
5 created GoPro video recordings GX010586 and GX010587 by him typing the following
6 to Defendants:

8 **IV. END OF EMAIL DEMANDING DISCOVERY**

9
10 INNOCENT and WRONGFULLY-CONVICTED CRIMINAL DEFENDANT
11 AROGANT HOLLYWOOD HEREBY DEMANDS that County of Los Angeles and Los
12 Angeles Sherriff's Department, Fraud and Cyber Crimes Bureau Southern California Hi-
13 Tech Taskforce (a joint law enforcement agency with Ventura County Sherriff's Office)
14 turn over and fully disclose an electronic copy of phony LASD-created GOPRO video
15 recordings GX010586 and GX010587 in fully-playable MP4 format:

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

18 The LASD Fraud and Cyber Crimes Bureau is located at MOUT

19 LASD Fraud and Cyber Crimes Bureau
20 11515 Colima Rd., Building A
Whittier, CA 90604

21 Additionally, the People and all emailed County of Los Angeles-employed criminal
22 prosecutors have a statutory and constitutional duty and obligation to immediately turn
23 over and disclose electronic copies of phony LASD-created GOPRO video recordings
24 GX010586 and GX010587 which depict and display inside Jennifer Hutton-Heger's
25 home with different clothing than he had on on February 21, 2023 by doing the
26 following:

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

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 JUDICIAL ABUSE OF PROCESS, 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 Neil Opdahl-Lopez, Esq.
2 Major, USMCR
3 (SBN: 277596)
4 473 Carnegie Drive, #200
5 San Bernardino, CA 92408

6 _____ 2. By uploading LASD-created GOPRO video recordings GL0108586 and
7 GX010587 onto evidence.com and then emailing criminal defense attorney access to
8 download impeaching criminal law evidence on evidence.com

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

10 626-429-6578
11 attorney@neilopdahl.com

12 Over the past 10 months, INNOCENT criminal defendant AROGANT
13 HOLLYWOOD has requested by emailing and telephoning business offices of James
14 William Garrison (igarrison@da.lacounty.gov, (213) 257-3198); Sharon Lee Woo
15 (swoo@da.lacounty.gov, (213) 257-2928); Victor Manuel Rodriguez
16 (vrodriguez@da.lacounty.gov, (626) 308-5400); Ronald Millard Galtz
17 (rgaltz@da.lacounty.gov, (213) 257-2185); and George Gascon
18 (ggascon@da.lacounty.gov, (213) 974-3512)) requesting that these County of Los
19 Angeles criminal prosecutors turn over and disclose original GOPRO video recordings
20 (now in the physical possession of AROGANT HOLLYWOOD) and impeaching
21 GOPRO video recordings GX010586 and GX010587 (never disclosed by the People and
22 MARK Rosenberg, yet requested in April, 2023 and October, 2023 criminal court
23 pleadings), yet these previously-named criminal prosecutors have all willfully, recklessly,
24 wantonly, maliciously, and callously failed to turn over and disclose original GOPRO
25 video recordings and phony LASD-created GOPRO video recordings GX010586 and
26 GX010587. Accordingly, this electronically-served DEMAND for discovery will be
27 formatted on pleading paper and filed with Alhambra Superior Court.

28 **YOU HAVE ALL BEEN HEREBY FOREWARNED.**

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 RACIST and BIASED Deputy District Attorney MARK Rosenberg willfully,
2 recklessly, wantonly, maliciously, and callously failed and refused to turn over an
3 electronic copy of manipulated and phony LASD-created GOPRO video recordings
4 GX010586 and GX010587 between March 28, 2023 and February 2, 2024. Accordingly,
5 pursuant to Los Angeles District Attorney Office's policies, practices and procedures
6 regarding disclosure to the Defense regarding video and audio evidence, the People have
7 a constitutional and statutory duty to immediately upload an electronic copy of phony
8 LASD-created GOPRO video recordings GX010586 and GX010587 (currently being
9 electronically stored on the hard drive of Brian MARK Rosenberg's laptop computer)
10 to evidence.com.

11
12 The People and emailed criminal prosecutors have until April 4, 2024 to comply
13 with this emailed discovery demand upon being served by FAX, electronic mail, and by
14 personal service of a California Process Server.

15
16 **I declare under penalty of perjury under the laws and Constitution of California
17 and United States that every word, sentence, paragraph, and page of this Criminal
18 Law legal document is true and correct.**

19
20 **Date: February 28, 2024**

21
22 As shown above, near the end of his detailed and long email to the above-stated
23 Defendants, KING AROGANT signed his email under the penalty of perjury.

24
25 189. As of October 31, 2024, Defendants Gavin Christopher Newsom, Leah Tamu
26 Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George
27 Gascón, and DOES 1-10 have all willfully, recklessly, carelessly, maliciously, wantonly,
28 and callously with under color of law deliberate indifference to the federally protected
civil rights of KING AROGANT recklessly failed to do any of the following for nearly
twelve consecutive months after the above-stated Defendants were given FAIR NOTICE
and received FAIR NOTICE:

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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. Respond to KING AROGANT's November 28, 2023 email.
2. Request that County of Los Angeles criminal prosecutors involved with frivolous criminal case GA114055 turn over and disclose to them all sixteen GoPro video recordings recklessly presented at the preliminary hearing held on April 4, 2023 and April 5, 2023, and especially phony LASD-created GoPro video recordings GLO10586 and GLO10587 that depicted and displayed KING AROGANT shutting off his GoPro camera with a bare right arm.
3. Immediately request that County of Los Angeles rogue, racist, biased, and dishonest criminal prosecutors Brian MARK Rosenberg and Victor Manuel Rodriguez's recklessly falsified evidence presented inside of the Superior Court of California, County of Los Angeles, Alhambra Superior Court, Department 1 on April 4, 2023 and April 5, 2023 be immediately turned over and disclosed to George Gascón, the Office of George Gascón, and the office of Attorney General Robert Bonta.
4. Launch an investigation into all KING AROGANT's November 28, 2023 emailed allegations and accusations that claimed County of Los Angeles District Attorney's Office criminal prosecutors and investigators recklessly falsified evidence inside of a Superior Court of California Superior Court criminal courtroom.
5. Request that Victor Manuel Rodriguez and MARK Rosenberg immediately turn over and disclose impeaching and phony LASD-created GoPro video recordings GX010586 and GX010587.
6. Request that rogue, racist, biased, and dishonest involved County of Los Angeles criminal prosecutors immediately turn over and disclose copies of impeaching phony LASD-created GoPro video recordings GX010586 and GX010587 in compliance with County of Los Angeles District Attorney's Office's Legal Policies and Procedures, Chapter 14.
7. Request that Victor Manuel Rodriguez and MARK Rosenberg immediately turn over and disclose all sixteen GoPro video recordings announced, presented, and admitted into Superior Court of California, County of Los Angeles, Alhambra Superior Court, Department 1 on April 4, 2023 and April 5, 2023, and testified to by rogue peace officer Lying Billy Khounthavong on April 5, 2023.
8. Request that Victor Manuel Rodriguez and MARK Rosenberg immediately turn over and Disclose a Hardcopy of a Detailed CAD report showing the exact time each of Jennifer Hutton-Heger's first and second 911 audio recordings commenced and ended.

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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

1 190. On information and belief, Defendants Gavin Christopher Newsom, Leah Tamu
2 Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-
3 10 between November 28, 2023, and October 31, 2024, have all had a meeting of minds
4 amongst each other and Defendant George Gascón and other named and unnamed
5 County of Los Angeles criminal prosecutors, employees, peace officers, and investigators
6 to recklessly violate the United States Constitution, and KING AROGANT's Fourth and
7 Fourteenth Amendment constitutional civil rights, and all named Defendants above and
8 herein did conspire amongst each other to violate KING AROGANT's federally
9 protected constitutional rights by doing all the aforementioned, and by staying silent
10 while condoning, tolerating, consenting to, overlooking, permitting, and otherwise
11 continuing to allow County of Los Angeles criminal prosecutors, employees, peace
12 officers, and investigators to frame KING AROGANT by tainting, tampering with,
13 altering, fabricating, and otherwise manipulating his exculpatory GoPro video recordings
14 evidence. See now KING AROGANT's February 28, 2024, email sent to Defendants
15 Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight
16 Halloran, Dennis L. Beck Jr., and DOES 1-10 attached as Exhibit _____ of KING
17 AROGANT's Verified Appendix of Exhibits.

18
19 191. Defendant George Gascón and Defendant GoPro Manipulator were both required
20 by law to turn over and disclose copies of phony LASD video recordings GX010586 and
21 GX010587 after being electronically served on February 28, 2024. After being
22 electronically served on February 28, 2024 Defendants Leah Tamu Wilson, Robert
23 Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-
24 10 were all required to aid and assist KING AROGANT with overturning his wrongful
25 felony conviction pursuant to State Bar of California Rules 3.3 Candor Toward Tribunal,
26 3.4 Fairness to Opposing Party and Counsel, and 3.8 Special Responsibilities of a

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 JUDICIAL ABUSE OF PROCESS, 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 Prosecutor, California Business and Professions Code § 6068, and American Bar
2 Association, Model Rules of Professional Conduct, Rules 3.1 Meritorious Claims and
3 Contentions, 3.3 Candor toward the Tribunal, Rule 3.4 Fairness to Opposing Party and
4 Counsel, and Rule 3.8 Special Responsibilities of a Prosecutor. Pursuant to State Bar of
5 California Rules 3.3 Candor Toward Tribunal, 3.4 Fairness to Opposing Party and
6 Counsel, and 3.8 Special Responsibilities of a Prosecutor, California Business and
7 Professions Code § 6068, and American Bar Association, Model Rules of Professional
8 Conduct, Rules 3.1 Meritorious Claims and Contentions, 3.3 Candor toward the Tribunal,
9 Rule 3.4 Fairness to Opposing Party and Counsel, and Rule 3.8 Special Responsibilities
10 of a Prosecutor Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight
11 Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 were all legally obligated
12 to aid and assist KING AROGANT with exonerating himself, clearing his good name,
13 and allowing him to move on. Defendants Leah Tamu Wilson, Robert Andres Bonta,
14 Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 between
15 November 28, 2023 and October 31, 2023, willfully, recklessly, maliciously, carelessly,
16 wantonly, and callously did nothing to aid and assist KING AROGANT with overturning
17 his wrongful, RACIST, BIASED, and unconstitutional felony criminal conviction and all
18 Defendants named herein continued to witness an innocent African-American and Black
19 man they all knew with 100% certainty was innocent be sent to a dangerous and
20 disturbingly violent California State Prison days later for a serious and violent felony
21 crime (after February 28, 2024 emailed being served) they all knew KING AROGANT
22 never committed. The willful, reckless, careless, malicious, wanton, and callous illegal
23 acts, actions, misconduct, misdoings, misdeeds, and transgressions of and in Defendants
24 recklessly ignoring KING AROGANT's emails served upon them all on November 28,
25 2023, December 2, 2023, December 11, 2023, January 15, 2024, and February 28. 2024
26 not only proves they all had deprived minds with complete disregard to the well-being

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 JUDICIAL ABUSE OF PROCESS, 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 , decency, peace of mind, liberty, and mental health of a human being. Defendants Gavin
2 Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran,
3 Dennis L. Beck Jr., George Gascón, and DOES 1-10's recklessly illegal acts, actions,
4 misconduct, misdeeds, misdoings, and transgressions of ignoring KING AROGANT's
5 emails served upon them all on November 28, 2023, December 2, 2023, December 11,
6 2023, January 15, 2024, and February 28. 2024 proves by clear and convincing evidence
7 that they are not entitled to any shape, form, or type of judicial, electoral, or prosecutorial
8 immunity.

9
10 192. Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres
11 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 all
12 willfully, knowingly, recklessly, wantonly, carelessly, maliciously, and wantonly violated
13 the United States Constitution and KING AROGANT's United States Fourteenth
14 Amendment Due Process Clause constitutional rights by recklessly ignoring KING
15 AROGANT's emails served upon them on November 28, 2023, December 2, 2023,
16 December 11, 2023, January 15, 2024, and February 28. 2024.

17
18 193. Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres
19 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 by
20 failing to intervene, failing to launch an investigation, and by recklessly ignoring KING
21 AROGANT's very serious and important emails served upon them all on November 28,
22 2023, December 2, 2023, December 11, 2023, January 15, 2024, and February 28. 2024.

23 194. Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran,
24 Dennis L. Beck Jr., George Gascón, and DOES 1-10 committed under color of law
25 reckless NEGLIGENCE TO LEGAL DUTY AND LEGAL OBLIGATION TO AID AND
26 ASSIST WITH OVERTURNING WRONGFUL FELONY CONVICTION by them all

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 willfully, knowingly, recklessly, wantonly, maliciously, and callously ignoring KING
2 AROGANT's November 28, 2023 email (Count 1), ignoring KING AROGANT's
3 December 2, 2023 email (Count 2), ignoring KING AROGANT's December 11, 2023
4 email (Count 3), ignoring KING AROGANT's January 15, 2024 email (Count 4), and
5 ignoring his February 28, 2024 email (Count 5).

6
7 194. Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres
8 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10
9 committed reckless under color of law DECEIT by them doing, by them using, and by
10 them engaging in illusionary and illegal acts, actions, misconduct, misdeeds, misdoings,
11 and transgressions of willfully, knowingly, maliciously, wantonly, carelessly, and
12 callously concealing from, hiding from, failing to disclose, failing to inform, and
13 otherwise tell Superior Court of California, County of Los Angeles, Alhambra Superior
14 Court, Department 1 that on November 28, 2023 and January 15, 2024 they were all
15 electronically served a nearly fifteen-minute REAL GoPro video recording that proved
16 KING AROGANT's factual innocence by clear and convincing evidence that he did not
17 commit any crime whatsoever on February 21, 2023 (Counts 1-2).

18
19 195. Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres
20 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10
21 committed reckless under color of law DECEIT by them doing, by them using, and by
22 them engaging in illusionary and illegal acts, actions, misconduct, misdeeds, misdoings,
23 and transgressions of willfully, knowingly, maliciously, wantonly, carelessly, and
24 callously concealing from, hiding from, failing to disclose, failing to inform, and
25 otherwise tell Superior Court of California, County of Los Angeles, Alhambra Superior
26 Court, Department 1 that based on November 28, 2023, and January 15, 2024, on being

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 JUDICIAL ABUSE OF PROCESS, 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**

1 served a nearly fifteen-minute GoPro video recording that proved KING AROGANT's
2 factual innocence by clear and convincing evidence; KING AROGANT's October 17,
3 2023, unlawful and unconstitutional felony conviction was no longer valid.

4
5 196. On information and belief, Defendants Gavin Christopher Newsom, Leah Tamu
6 Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-
7 10 between November 28, 2023, and October 31, 2024 willfully, knowingly, maliciously,
8 wantonly, carelessly, and callously had a meeting of minds with Defendant George
9 Gascón and other named and unnamed County of Los Angeles District Attorney's Office
10 employees and attorneys to violate KING AROGANT's constitutional civil rights by
11 doing all the aforementioned and by staying silent while condoning, tolerating,
12 acquiescing, consenting to, overlooking, permitting, and otherwise continuing to allow
13 County of Los Angeles criminal prosecutors to recklessly frame KING AROGANT for a
14 serious and violent crime he did not commit by tainting, tampering with, altering,
15 fabricating, and otherwise manipulating his exculpatory GoPro video recordings
16 evidence. Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres
17 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 all
18 willfully, knowingly, carelessly, wantonly, maliciously, and callously violated the United
19 States Constitution and KING AROGANT's United States Fourteenth Amendment Due
20 Process Clause constitutional civils, and they all committed under color of law fraud and
21 deceit by recklessly hiding from Superior Court of California, County of Los Angeles,
22 Alhambra Superior Court, Department 1 the fact that they had been electronically served
23 a copy of a nearly fifteen-minute GoPro video recording that proved KING AROGANT's
24 factual innocence by clear and convincing evidence and that based on KING
25 AROGANT's newly discovered video recording evidence served upon them, they all had
26 (with the exception of Defendant Newsom) a prosecutorial duty and obligation to aid 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 JUDICIAL ABUSE OF PROCESS, 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 assist KING AROGANT with immediately overturning his wrongful felony conviction
2 pursuant to the **State Bar of California, Rule 3.8, Special Responsibilities of a**
3 **Prosecutor**. Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight
4 Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 all willfully, knowingly,
5 carelessly, wantonly, maliciously, and callously violated **State Bar of California, Rule**
6 **3.8, Special Responsibilities of a Prosecutor** by being served electronically video
7 recording evidence that proved KING AROGANT's factual innocence by clear and
8 convincing evidence, and then recklessly ignoring that electronically served exculpatory
9 evidence by neglecting their legal duty and legal obligation as criminal prosecutors to aid
10 and assist KING AROGANT with overturning his wrongful conviction, in direct
11 violation of State Bar of California, Rule 3.8.

12
13 **D. DEFENDANTS JEFFREY A MACOMBER, JASON D. JOHNSON,**
14 **JENNIFER BARRETTO, TAMMATHA FOSS, CHRISTOPHER**
15 **CHAMBERS, RONALD BROOMFIELD, JENNIFER BENAVIDEZ, GAVIN**
16 **CHRISTOPHER NEWSOM, ROBERT ANDRES BONTA, PETER**
17 **DWIGHT HALLORAN, DENNIS L. BECK JR., LEAH TAMU WILSON, &**
18 **GEORGE GASCÓN ALL RECEIVED FAIR NOTICE AND WERE ALL**
19 **GIVEN FAIR NOTICE THAT COUNTY OF LOS ANGELES CRIMINAL**
20 **PROSECUTORS AND LYING STATE GOVERNMENT WITNESSES**
21 **SENT KING AROGANT TO CALIFORNIA STATE PRISON BY**
22 **RECKLESSLY VIOLATING KING AROGANT'S CONSTITUTIONAL**
23 **CIVIL RIGHTS PURSUANT TO CALIFORNIA PENAL CODE § 745,**
24 **HENRY NAPUE V. ILLINOIS AND THE DUE PROCESS CLAUSE OF THE**
25 **FOURTEENTH AMENDMENT OF UNITED STATES CONSTITUTION.**

26
27
28 197. Plaintiff KING AROGANT hereby restates, realleges, reiterates, reincorporates,
and incorporates by reference all previous paragraphs 1-196.

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 JUDICIAL ABUSE OF PROCESS, 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

1 198. October 17, 2023 prejudiced, biased, and in collusion Superior Court of California
2 judicial officer Michael Villalobos accepted a *nolo contendere* from KING AROGANT
3 for making a criminal threat to FAKE VICTIM Jennifer Hutton-Heger on February 21,
4 2023 and placed KING AROGANT formally on felony probation.

5
6 199. On or about October 22, 2023, KING AROGANT contacted Superior Court of
7 California County of Los Angeles LYING and RACIST video recording and audio
8 recording expert court-appointed witness Thomas Guzman-Sanchez (**hereinafter**
9 **“LYING AND RACIST SANCHEZ”**) on the telephone by dialing his mobile phone
10 number of (818) 399-1255. After the second or third ring RACIST SANCHEZ picked-up
11 KING AROGANT’s telephone call to him by answering his mobile phone number of
12 (818) 399-1255. On the very short telephone call (call lasted just over one minute) KING
13 AROGANT told RACIST SANCHEZ that he was going to sue him for not doing his job
14 by failing to properly examine County of Los Angeles District Attorney’s Office GoPro
15 video recordings given to him by rogue and very dishonest County of Los Angeles
16 deputy district attorney Brian MARK Rosenberg in August 2023. KING AROGANT told
17 RACIST SANCHEZ on their recorded telephone call that he felt that RACIST Sanchez
18 had spit in his face by not helping him because he had the Superior Court award
19 RACIST SANCHEZ 40 hours (in total, KING AROGANT filed two motions resulting in
20 RACIST SANCHEZ receiving approximately 60 hours billed at approximately \$ 250.00
21 per hour). RACIST SANCHEZ responded to KING AROGANT’s verbal statements as
22 laying and mocking KING AROGANT. Below and referenced herein is a true and correct
23 copy of KING AROGANT and RACIST SANCHEZ’s late October 2023 telephone
24 conversation:

25
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 JUDICIAL ABUSE OF PROCESS, 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**

TRANSCRIPT IN SUPPORT OF SECRETARY RECALLING SENTENCE

1
2
3 **INT. OCTOBER 22, 2023 AT 2:14 P.M.**

4 **AROGANT HOLLYWOOD: Can you hear me? Hello?**

5 **RACIST SANCHEZ: Why are you calling?**

6
7 **AROGANT HOLLYWOOD: Ah, just to show you. I'm a video expert.**
8 **So I I got the original videos. And**
9 **their falsified. They have dates of 11**
10 **o'clock, and and twelve o'clock. And you**
11 **know you couldn't figure this out. But so**
12 **as I. I got my computer out. I was able to**
13 **crack your case in about five seconds.**
14 **The videos are falsified. How was I able to**
15 **make videos at 11 o'clock. When I was in**
16 **handcuffs at what ten, ten fifteen? Right?**
17 **We all know this incident was over way**
18 **before 11 o'clock. (inaudible).**

19 **RACIST SANCHEZ: Why are you. Why are you explaining this**
20 **to me? This is, this is your case?**

21 **AROGANT HOLLYWOOD: Because. It is. But you're the re. You**
22 **didn't help man. I got you a lot of hours**
23 **and you really spit in my face and I'm**
24 **going to sue you. All right. I'm just letting**
25 **you know. The lawsuit is going to come a**
26 **lot sooner than you think. So,**

27 **RACIST SANCHEZ: SINISTER AND EVIL GRINNING**
28 **LAUGH**

AROGANT HOLLYWOOD: So, I have a lawyer. (inaudible)

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, & NEGLIGENCE IIED

1 **RACIST SANCHEZ:** **So, okay understand. Understand.**

2 **AROGANT HOLLYWOOD:** **Listen, I'm well known for suing people.**
3 **You didn't help me.**

4 **RACIST SANCHEZ:** **That that is a threat. Listen, that's a threat**
5 **and now I'm going to report you.**

6
7 **AROGANT HOLLYWOOD:** **It's not a threat its a promise mother**
8 **fucker. You're on a recorded line.**

9 **RACIST SANCHEZ:** **And now, I'm going...**

10 **AROGANT HOLLYWOOD:** **Go ahead mother fucker You wanna make**
11 **something up.**

12
13 **RACIST SANCHEZ:** **And now (SINISTER AND EVIL LAUGH) I'm**
14 **going to report you.**

15 **AROGANT HOLLYWOOD:** **You're a on recorded line. You're on a**
16 **recorded line. You wanna make something**
17 **up go ahead. Fuck that.**

18
19 200. On or about November 27, 2023, RACIST SANCHEZ sent a two-page declaration
20 to rogue and dishonest County of Los Angeles criminal prosecutor Victor Manuel
21 Rodrguez (SBN # 156150), who is the head deputy district attorney in charge of County
22 of Los Angeles District Attorney's Office Alhambra filed office. In perjurious declaration
23 RACIST SANCHEZ lied that KING AROGANT had said that he "*was going to fuck*
24 *him up.*"

25
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 JUDICIAL ABUSE OF PROCESS, 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**

1 201. On or about November 28, 2023, rogue County of Los Angeles criminal prosecutor
2 Victor Manuel Rodriguez filed a motion to revoke KING AROGANT's felony probation.
3 The motion for revocation was so frivolous that it did not allege that any of the following
4 had occurred:

- 5 1. That KING AROGNAT was arrested and that there was an arrest report.
- 6 2. That there was a crime report.
- 7 3. That criminal charges had been filed.
- 8 4. That criminal charges had been declined to be filed

9
10 On the frivolous revocation, Victor Manuel Rodriguez stated that KING AROGANT
11 violated his felony probation by engaging in criminal code of violation of California
12 Penal Code §§ 646.9 and 422. In support of his frivolous motion to revoke KING
13 AROGANT's felony probation, rogue County of Los Angeles criminal prosecutor Victor
14 Manuel Rodrguez attached as an exhibit RACIST SANCHEZ's declaration in which he
15 accused KING AROGANT of making a criminal threat to him over the telephone in late
16 October 2023. Since none of the mandatory boxes for felony probation revocation were
17 checked by Victor Manuel Rodriguez on his bogus felony probation revocation.
18 Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L.
19 Beck Jr., George Gascón, & DOES 1-10 all committed reckless under color of law, and
20 reckless under color of law United States Constitution Fourteenth Amendment Due
21 Process Clause constitutional civil rights violations because after they were emailed
22 numerous times regarding overturning KING AROGANT's fraudulent felony conviction
23 and failed to aid and assist him with overturning his wrongful felony conviction they are
24 wholly responsible for rogue County of Los Angeles criminal prosecutor Victor Manuel
25 Rodriguez's illegal acts, actions, misconduct, misdoings, misdeeds, and transgressions of
26 recklessly filing a frivolous felony probation revocation against KING AROGANT

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 JUDICIAL ABUSE OF PROCESS, 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 without probable cause whatsoever.
2

3 202. In late November 2023, RACIST SANCHEZ willfully, recklessly, carelessly,
4 wantonly, and callously violated California Government Code § 6200 by fabricating lies
5 that during a recorded telephone conversation KING AROGANT told him that he was
6 going to fuck him up, and then after KING AROGANT threatened to physical harm him
7 he then told KING AROGANT that he would report him. See now a copy of lying state
8 government witness Thomas Leo Guzman-Sanchez's declaration and Victor Ridriguez's
9 motion to revoke KING AROGANT's felony probation attached as Verified Appendix of
10 Exhibits, Exhibit _____. The evidence before this United States District Court proves by
11 clear and convincing evidence that Defendants Leah Tamu Wilson, Robert Andres Bonta,
12 Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, & DOES 1-10 recklessly
13 violated KING AROGANT's Fourteenth Amendment constitutional civil rights just by
14 rogue County ofo Los Angeles criminal prosecutor Victor Manuel Rodriguez ever filing
15 his frivolous and unconstitutional motion for felony probation revocation against KING
16 AROGANT without probable cause whatsoever.
17

18 203. On December 11, 2023, KING AROGANT appeared in the Superior Court of
19 California, County of Los Angeles, Alhambra Superior Court, Department 1, with the
20 prejudiced, biased, and in collusion judicial officer Michael Villalobos presiding. KING
21 AROGANT told the Superior Court of California, County of Los Angeles, Alhambra
22 Superior Court, Department 1 that he had with him the original GoPro video recordings
23 that would prove he was innocent. While most Superior Court of California criminal
24 judicial officers would have been very interested in reviewing such exculpatory evidence
25 immediately before remanding an innocent human being, in collusion, judicial officer
26 Michael Villalobos waved KING AROGANT off. The original GoPro video
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 JUDICIAL ABUSE OF PROCESS, 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 recording GX010586 (recklessly split up by Southern California High Tech Task force
2 rogue peace officers into GX010586, GX010587, GX010588, GX010589, & GL01090)
3 did not and did not show KING AROGANT committing any crime whatsoever. The
4 original GoPro video recording GX010586 (recklessly split up by Southern California
5 High Tech Task force rogue peace officers into GX010586, GX010587, GX010588,
6 GX010589, & GL01090) did not and did not show KING AROGANT shutting off his
7 GoPro camera. See now a true and correct copy of KING AROGANT's original GoPro
8 video recordings that were returned to him October 17, 2023 that were recklessly split up
9 and manipulated by County of Los Angeles Sheriff's Department's Fraud and Cyber
10 Crimes Bureau's Southern California High Tech Task Force rogue and dishonest peace
11 officers.

12
13 204. On December 11, 2023 KING AROGANT told the Superior Court of California,
14 County of Los Angeles, Alhambra Superior Court, Department 1 that he had evidence on
15 his I-Phone that he never threatened RACIST SANCHEZ and requested to the Superior
16 Court to allow him to transfer this exculpatory evidence off his phone and onto his
17 Dropbox cloud so he could access at his felony probation revocation hearing. Michael
18 Villalobos on the Superior Court recorded directed and ordered County of Los Angeles
19 Sheriff's Department peace officers assisting with KING AROGANT's remand to give
20 KING AROGANT his mobile phone and allow him to transfer files on it while he was in
21 Alhambra Superior Court lock-up. County of Los Angeles peace officers assisting the
22 Superior Court with KING AROGANT's remand recklessly violated KING AROGANT
23 United States Fourteenth Amendment Due Process Clause constitutional civil rights by
24 after KING AROGANT was remanded recklessly refusing to permit KING AROGANT
25 to transfer evidence he would need to access in court when RACIST SANCHEZ would
26 testify against KING AROGANT. In collusion Superior of California judicial officer

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 JUDICIAL ABUSE OF PROCESS, 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 Michael Villalobos remanded KING AROGANT into custody and ordered County of Los
2 Angeles Sheriff's Department to bring him back to Superior Court on December 28, 2023
3 at 8:30 AM, which resulted in KING AROGANT being wrongfully incarcerated and
4 missing spending Christmas with his fiancée and woman since September 19, 2012
5 Alison Helen Fairchild.

6
7 205. On December 28, 2023 previously emailed and previously legally warned Leah
8 Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George
9 Gascón, Gavin Christopher Newsom, & DOES 1-10 were all responsible for the actions
10 of County of Los Angeles rogue and dishonest criminal prosecutor Cindy Juhyun Park
11 (SBN # 271933), and Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter
12 Dwight Halloran, Dennis L. Beck Jr., George Gascón, Gavin Christopher Newsom, &
13 DOES 1-10 are all guilty of under color FRAUD, under color DECEIT, and under color
14 of law DUE PROCESS violations after lying County of Los Angeles criminal prosecutor
15 Ciny Park fabricated lies to, misrepresented to, and otherwise deceived Superior Court of
16 California, County of Los Angeles, Alhambra Superior Court, Department 1 by willfully,
17 knowingly, carelessly, maliciously, wantonly, and callously telling it that there were
18 more than one victim that would testify at KING AROGANT's felony probation
19 revocation hearing. Cindy Park further deceived KING AROGANT and Department 1 by
20 her fabricating lies and telling the Superior Court that a continuance was necessary
21 because she had compact discs of evidence to turn over to KING AROGANT. Cindy
22 Park further committed under color of law fraud and deceit when she took her Academy
23 award nominated performance to the next level by presenting to Department 1 compact
24 discs and then fabricating lies that the Superior Court should continue KING
25 AROGANT;s felony probation hearing and appoint a private investigator so KING
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 JUDICIAL ABUSE OF PROCESS, 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 could review the evidence that Cincy Park had allocated to her compact
2 discs. The policy of the County of Los Angeles District Attorney's Office during the year
3 2023 was to turn over all its discovery by that evidence being uploaded on evidence.com
4 and the criminal defendant's attorneys and investigators being given access to download
5 and review all evidence in the case on evidence.com. Defendants Leah Tamu Wilson,
6 Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, Gavin
7 Christopher Newsom, & DOES 1-10 and Cindy Park all committed under color of law
8 fraud and under color law deceit by deceiving Superior Court of California, County of
9 Los Angeles, Alhambra Superior Court, Department 1 so that it would foolishly believe
10 that she had prepared evidence on some blank and unlabeled that should probably
11 purchased on Amazon.com because her County of Los Angeles District Attorney's Office
12 Alhambra Field Office has not kept any compact discs there for several years since most
13 desktops, Macbooks, and windows personal computews that were made and
14 manufactured in the past eight hears do not have blu ray or CD drives. Cindy Park knew
15 this and she also knew that any private investigator hired by the Superior Court would not
16 have a personal computer or Macbook laptop that contained a compact disc drive. Based
17 on Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis
18 L. Beck Jr., George Gascón, Gavin Christopher Newsom, & DOES 1-10; Cindy Park and
19 in collusion judicial officer Michael Villalobos committed under color of FRAUD and
20 also under color of law violations of KING AROGANT's Fourteenth Amendment
21 constitutional civil rights by recklessly continuing KING AROGANT's felony probation
22 revocation hearing to January 12, 2024. KING AROGANT missed spending Christman
23 and the New Year's Eve holiday celebration with his fiancée Alison Helen Fairchild only
24 because Defendants had failed to aid and assist with overturning KING AROGANT's
25 wrongful felony conviction after they were all emailed in November 2023 and December
26 2023.

27 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,**
28 **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 JUDICIAL ABUSE OF PROCESS, 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

1 206. On January 12, 2024 at approximately 9:30 AM KING AROGANT's frivolous and under
2 color of law felony probation revocation commenced. On direct examination RACIST
3 SANCHEZ committed reckless under color of law FRAUD, reckless under color of law
4 DECEIT, and reckless under color of law Fourteenth Amendment Due Process Clause
5 constitutional violations by recklessly fabricating lies that KING AROGANT made a criminal
6 threat to him in late October 2023, and by concealing from, hiding from, and failing to disclose
7 to the Superior Court of California, County of Los Angeles, Alhambra Superior Court that
8 during RACIST SANCHEZ and KING AROGANT's single telephone call in October 2023
9 KING AROGANT did not make any verbal threats to physically harm him. Which was reckless
10 under color of FRAUD, reckless under color of law DECEIT, and reckless under color of law
11 Fourteenth Amendment Due Process Clause constitutional violations done by Cindy Park, and
12 Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L.
13 Beck Jr., George Gascón, Gavin Christopher Newsom, & DOES 1-10 for the unlawful
14 purposes of tricking, fooling, manipulating, lying to, and otherwise deceiving a criminal
15 Superior Court of California courtroom so that it would foolishly believe that KING
16 AROGANT made a criminal threat to RACIST SANCHEZ. Which was reckless under
17 color of law FRAUD, reckless under color of law DECEIT, and reckless under color of
18 law and reckless under color of law Fourteenth Amendment Due Process Clause constitutional
19 violations done by Cindy Park, and Defendants Leah Tamu Wilson, Robert Andres Bonta,
20 Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, Gavin Christopher Newsom,
21 & DOES 1-10 by them using, by doing, by them employing, and by them otherwise
22 engaging in illusionary and manipulated illegal acts of deceit, deception, conspiracies,
23 concealment, fraud and corruption so that they could gain unfair, unjust, illegal, unlawful,
24 and unconstitutional advantage over KING AROGANT.

25
26 207. On January 12, 2024 KING AROGANT, acting in propria persona, asked RACIST

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 JUDICIAL ABUSE OF PROCESS, 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**

1 SANCHEZ why he didn't he call the police or file a police report, he replied that he reported
2 KING AROGANT to the Superior Court.

3
4 208. On January 12, 2024 in collusion Superior Court of California judicial officer Michael
5 Villalobos found probable cause to believe that KING AROGANT violated his felony probation
6 and terminated it. Michael Villalobos set KING AROGANT's sentencing for February 2, 2024.

7
8 209. On February 2, 2024 in collusion and prejudiced Superior Court of California judicial
9 officer Michael Villalobos sentenced KING AROGANT to two years to be served in a
10 California State prison. In his biased court ruling judicial officer Michael Villalobos told KING
11 AROGANT that he needed mental health help for making criminal threats (Villalobos basically
12 said in ruling that KING AROGANT is guilty of making criminal threats to lying witnesses
13 Thomas Leo Guzman-Sanchez and Jennifer Hutton-Heger). In his ruling Villalobos told KING
14 AROGANT that after he was released from state prison he would be placed on felony parole
15 supervision.

16
17 210. Between November 27, 2023 and February 2, 2024, and throughout the time period of
18 their frivolous felony probation revocation Defendants Leah Tamu Wilson, Robert Andres
19 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, Gavin Christopher
20 Newsom, & DOES 1-10's illegal and unconstitutional felony probation revocation
21 proceedings and procedures all willfully, knowingly, carelessly, wantonly, maliciously,
22 and callous violated California Penal Code § 745, et seq, *Napue v. Illinois*, State Bar of
23 California Rules 3.3 Candor Toward Tribunal, 3.4 Fairness to Opposing Party and
24 Counsel, and 3.8 Special Responsibilities of a Prosecutor, California Business and
25 Professions Code § 6068, and American Bar Association, Model Rules of Professional
26 Conduct, Rules 3.1 Meritorious Claims and Contentions, 3.3 Candor toward the Tribunal,

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 JUDICIAL ABUSE OF PROCESS, 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.
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NEGLIGENT IIED**

1 Rule 3.4 Fairness to Opposing Party and Counsel, and Rule 3.8 Special Responsibilities
2 of a Prosecutor, and County of Los Angeles District Attorney's Office Legal Policies and
3 Procedures.

4
5 211. On April 17, 2024 KING AROGANT was released from State of California North
6 Kern State Prison, and then he immediately returned to home he partly owns located at
7 13732 Runnymede Street, Van Nuys, CA 91405.

8
9 212. On or about April 20, 2024 KING AROGANT played the on or about October 22,
10 2023 audio recording call between RACIST SANCHEZ and KING AROGANT for
11 Defendant Cheryl Lynn Kaylor. Defendant Kaylor told KING AROGANT that she did
12 not hear him make any criminal threats on the audio recording, and she stated the
13 following verbatim "***I am very sorry that you had to go to prison for doing nothing***
14 ***wrong.***" Defendant Cheryl Lynn Kaylor's acknowledgment and opinion that KING
15 AROGANT was wrongfully sent to state prison prove by clear and convincing evidence
16 that she is a proper Defendant before this United States district court.

17
18 213. On April 24, 2024 KING AROGANT played the on or about October 22, 2023 audio
19 recording call between RACIST SANCHEZ and KING AROGANT for State of
20 California felony parole supervision peace officer Fernando Sanchez while he was
21 conducting a felony parole supervision home visit for KING AROGANT. CDCR peace
22 officer Fernando Cortez observed and commented to KING AROGANT that he did not
23 hear him make any criminal threats to Thomas Guzman' Sanchez. When KING
24 AROGANT requested that Cortez speak to his supervisor about terminating his felony
25 parole, Cortez replied "***we only deal with your parole, termination is up the courts.***"
26 The playing of KING AROGANT and RACIST SANCHEZ's audio recording call occurred

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 JUDICIAL ABUSE OF PROCESS, 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 during a felony parole supervision home visit peace officer Fernando Cortez conducted at 13732
2 Runnymede Street, Van Nuys, CA 91405.

3
4 214. Plaintiff KING AROGANT hereby restates, realleges, reiterates, reincorporates, and
5 incorporates by reference previous paragraphs 1-213 of this original civil rights complaint.

6
7 215. On Saturday, June 8, 2024, at 8:58 AM, Defendants Gavin Christopher Newsom
8 (gavin.newsom@gov.ca.gov), Leah Tamu Wilson (leah.wilson50@yahoo.com
9 leaht.wilson@calbar.ca.gov) Robert Andres Bonta (robert.bonta@doj.ca.gov, Peter
10 Dwight Halloran (peter.halloran@doj.ca.gov), Dennis L. Beck Jr.
11 (dennis.beck@doj.ca.gov), Jennifer Benavidez (jennifer.benavidez@cdcr.ca.gov), George
12 Gascón (ggascon@da.lacounty.gov), Jeffrey A. Macomber
13 (jeff.macomber@cdcr.ca.gov), Jason D. Johnson (jason.johnson@cdcr.ca.gov), Jennifer
14 Barretto (jennifer.barretto@cdcr.ca.gov), Ronald Broomfield
15 (ron.broomfield@cdcr.ca.gov), Tammatha Foss (tammy.foss@cdcr.ca.gov), Christopher
16 Chambers (chris.chambers@cdcr.ca.gov), over one hundred County of Los Angeles criminal
17 prosecutors and State Bar licensed attorneys, and DOES 1-10 all received an email
18 containing detailed facts and allegations that described how County of Los Angeles
19 deputy district attorney Brian MARK Roseberg, rogue peace officer Billy D.
20 Khounthavong, and County of Los Angeles willfully, knowingly, recklessly, carelessly,
21 wantonly, maliciously, and callously framed KING AROGANT by recklessly presenting to a
22 Superior Court of California criminal courtroom phony and bogus LASD-created GoPro video
23 recordings that depicted and displayed KING AROGANT shutting off his GoPro camera inside
24 of the now deceased FAKE VICTIM Jennifer Hutton-Heger's home on February 21, 2023. Near
25 the end of his detailed email KING AROGANT typed the following:

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 JUDICIAL ABUSE OF PROCESS, 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.
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NEGLIGENT IIED**

1 **AT THE BOTTOM OF THIS EMAIL IS AN ATTACHMENT FOR THE**
2 **ORIGINAL MP4 VIDEO FILE AND IT CAN BE EASILY DOWNLOADED TO**
3 **ANYONE EMAILED HEREIN**

4
5 Attached to the end of KING AROGANT's electronic mail was a Google Gmail virus-
6 scanned electronic copy of KING AROGANT's nearly fifteen-minute REAL GoPro
7 video recording that did not depict and display him doing any of the following:

- 8
9 1. Banging, kicking, and otherwise touching Jennifer Hutton-Heger's doors inside her
10 home.
- 11 2. Making a criminal threat.
- 12 3. Brandishing a knife.
- 13 4. Interacting or engaging with Hutton inside of her home in-person
- 14 5. Jennifer Hutton-Heger is not seen at all on camera in the long video recording
15 while KING AROGANT is inside of her home.
- 16

17
18 The nearly fifteen-minute GoPro video recording titled **REAL VIDEO FOR 2-21-**
19 **2023.mp4** was attached to KING AROGANT's electronic mail as a blue highlighted
20 hyper-linked file in MP4 video recording format that was playable on any Personal
21 Computer laptop, Macintosh laptop ("Macbook"), Android-powered mobile device, or
22 Apple I-Phone. See now KING AROGANT's June 8, 2024 email to Defendants Gavin
23 Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran,
24 Dennis L. Beck Jr., George Gascón, Jeffrey A. Macomber , Jason D. Johnson, Jennifer
25 Barretto, Tammatha Foss, Christopher Chambers, Jennifer Benavidez Ronald Broomfield, &
26 DOES 1-10 attached hereto as Exhibit ____ of KING AROGANT's Verified Appendix
27 of Exhibits.

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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 All emailed Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres
2 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, Jeffrey A.
3 Macomber , Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers,
4 Jennifer Benavidez Ronald Broomfield, & DOES 1-10 received FAIR NOTICE that the
5 County of Los Angeles recklessly framed KING AROGANT for a serious and violent
6 felony they all knew with one hundred percent certainty that KING AROGANT never
7 committed. Yet, as of October 31, 2024, all emailed Defendants Gavin Christopher
8 Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L.
9 Beck Jr., George Gascón, Jeffrey A. Macomber , Jason D. Johnson, Jennifer Barretto,
10 Tammatha Foss, Christopher Chambers, Jennifer Benavidez, Ronald Broomfield, & DOES
11 1-10 have all willfully, knowingly, recklessly, carelessly, wantonly, maliciously, and
12 callously with under color of law deliberate indifference to the federally protected
13 constitutional civil rights of KING AROGANT, recklessly failed to do any of the
14 following for nearly four consecutive months after they all were given FAIR NOTICE,
15 and after they all received FAIR NOTICE:

- 16 1. Respond to KING AROGANT's June 8, 2024 email.
- 17
18 2. Request that County of Los Angeles turn over and disclose to them all sixteen GoPro
19 video recordings recklessly presented at KING AROGANT's preliminary hearing, and
20 especially phony GoPro video recordings GX010586 and GX010587 that depicted and
21 displayed KING AROGANT shutting off his GoPro camera.
- 22 3. Request that County of Los Angeles District Attorney's Office turn over and disclose
23 to California Department of Justice all April 4, 2023 and all April 5, 2023 preliminary
24 hearing transcripts.
- 25 4. Launch an investigation into all KING AROGANT's November 28, 2023 emailed
26 Allegations and accusations that claimed County of Los Angeles District Attorney's
27 Office recklessly falsified evidence inside a criminal Superior Court of California, which
28 was in direct violation of California Government Code § 6200

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 JUDICIAL ABUSE OF PROCESS, 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**

5. Immediately terminate KING AROGANT State of California felony parole supervision.

216. Near the end of his detailed June 8, 2024 email sent to Defendants KING AROGANT not only gave Defendants FAIR NOTICE, but KING AROGANT also cried out for help from Eastern District CDCR Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Ronald Broomfield, Jennifer Benavidez Tammatha Foss, Christopher Chambers, & DOES 1-10 to immediately terminate KING AROGANT's felony parole which they all had the power to do. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Ronald Broomfield, Jennifer Benavidez Tammatha Foss, Christopher Chambers, & DOES 1-10 all committed reckless under color of FRAUD, reckless under color of law DECEIT, and reckless under color of law Fourteenth Amendment Due Process Clause constitutional violations by recklessly failing to help KING AROGANT by immediately terminating his unconstitutional and unlawful felony parole supervision, and also by Defendants concealing from, hiding, failing to disclose, and failing to otherwise inform Superior Court of California, County of Los Angeles, Alhambra Superior Court, Department 1 that they were electronically served a nearly fifteen-minute GoPro video recordings that proved KING AROGANT's factual innocence by clear and convincing evidence. The end of KING AROGANT's June 8, 2024 email read:

**BASED ON THE OVERWHELMING EVIDENCE
PRESENTED IN THIS EMAIL REGARDING MY INNOCENCE
AND ALSO PROOF THAT THE PEOPLE AND LASD
FRAMED ME FOR A SERIOUS FELONY CRIME I NEVER
COMMITTED. AROGANT HOLLYWOOD HEREBY
RESPECTFULLY REQUESTS THAT THE SECRETARY OF
THE CALIFORNIA DEPARTMENT OF CORRECTIONS AND
REHABILITATION IMMEDIATELY TERMINATE MY**

**satory 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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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NEGLIGENT IIED**

1
2
3 **UNLAWFUL AND CLEARLY ILLEGAL PAROLE**
4 **SUPERVISION.**
5

6 217. On information and belief, Defendants Gavin Christopher Newsom, Leah Tamu
7 Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Jeffrey A.
8 Macomber , Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers,
9 Jennifer Benavidez, Ronald Broomfield, & DOES 1-10 between June 8, 2024, and
10 October 31, 2024, willfully, knowingly, maliciously, wantonly, carelessly, and callously
11 had a meeting of minds with Defendant George Gascón and other named and unnamed
12 County of Los Angeles District Attorney's Office employees and attorneys to violate
13 KING AROGANT's constitutional civil rights by doing all the aforementioned and by
14 staying silent while condoning, tolerating, acquiescing, consenting to, overlooking,
15 permitting, and otherwise continuing to allow County of Los Angeles criminal
16 prosecutors to recklessly frame KING AROGANT for a serious and violent crime he did
17 not commit by tainting, tampering with, altering, fabricating, and otherwise manipulating
18 his exculpatory GoPro video recordings evidence. Defendants Gavin Christopher
19 Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L.
20 Beck Jr., George Gascón, Jeffrey A. Macomber , Jason D. Johnson, Jennifer Barretto,
21 Tammatha Foss, Christopher Chambers, Jennifer Benavidez, Ronald Broomfield, & DOES
22 1-10 all willfully, knowingly, carelessly, wantonly, maliciously, and callously violated
23 the United States Constitution and KING AROGANT's United States Fourteenth
24 Amendment Due Process Clause constitutional civils, and they all committed under color
25 of law fraud and deceit by recklessly hiding from Superior Court of California, County of
26 Los Angeles, Alhambra Superior Court, Department 1 the fact that they had been

27 electronically served a copy of a nearly fifteen-minute GoPro video recording that proved
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 JUDICIAL ABUSE OF PROCESS, 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
2 KING AROGANT's factual innocence by clear and convincing evidence and based on
3 KING AROGANT's newly discovered video recording evidence served upon them.
4 Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L.
5 Beck Jr., George Gascón, & DOES 1-10 all had a prosecutorial duty and obligation to aid
6 and assist KING AROGANT with immediately overturning his wrongful felony
7 conviction pursuant to the **State Bar of California, Rule 3.8, Special Responsibilities of**
8 **a Prosecutor**. Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight
9 Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 all willfully, knowingly,
10 carelessly, wantonly, maliciously, and callously violated **State Bar of California, Rule**
11 **3.8, Special Responsibilities of a Prosecutor** by being served electronically video
12 recording evidence that proved KING AROGANT's factual innocence by clear and
13 convincing evidence, and then recklessly ignoring that electronically served exculpatory
14 evidence by neglecting their legal duty and legal obligation as criminal prosecutors to aid
15 and assist KING AROGANT with overturning his wrongful conviction, in direct
16 violation of Rule 3.8.

17
18 218. Defendants Jeffrey A. Macomber , Jason D. Johnson, Jennifer Barretto, Tammatha
19 Foss, Christopher Chambers, Jennifer Benavidez, Ronald Broomfield, & DOES 1-10 all
20 willfully, knowingly, carelessly, wantonly, maliciously, and callously violated the United
21 States Constitution and KING AROGANT's United States Fourteenth Amendment Due
22 Process Clause constitutional civils, and they all committed under color of law fraud and
23 deceit, and under color of law neglect to their legal obligation and legal duty to aid and
24 assist with immediately terminating KING AROGANT's unlawful and unconstitutional
25 felony parole supervision by recklessly hiding from Superior Court of California, County
26 of Los Angeles, Alhambra Superior Court, Department 1 the fact that they had been

27 **electronically served a copy of a nearly fifteen-minute GoPro video recording that proved**
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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
2 KING AROGANT's factual innocence is supported by clear and convincing evidence,
3 including newly discovered video recording evidence served upon them, and thus,
4 Defendants Jeffrey A. Macomber , Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
5 Christopher Chambers, Jennifer Benavidez, Ronald Broomfield, & DOES 1-10 were all
6 legally obligated pursuant to California Penal Code § 1170, subdivision (d) to file papers
7 in the Superior Court of California, County of Los Angeles Alhambra Superior Court
8 immediately, requesting and recommending that KING AROGANT's felony parole
9 supervision be terminated immediately.

10
11 219. Attached as electronic mail attachments at the end of KING AROGANT's June 8, 2024
12 email were portable document file versions of rogue County of Los Angeles peace officers'
13 judicially forged probable cause determination and search warrant, and also two images taken
14 from KING AROGANT's REAL GOPRO video recordings.

15
16 220. The in-all capitalization subject line read:

17
18 **people v. AROGANT HOLLYWOOD (GA114055) & UPCOMING FIRST**
19 **CIVIL RIGHTS COMPLAINT TITLED AROGANT HOLLYWOOD v. judy**
20 **whitehurst, et al [DEMAND PEOPLE AND LASD IMMEDIATELY TURN**
21 **OVER PHONY LASD GOPRO VIDEO RECORDINGS GLO10586 &**
22 **GLO10587 [I GOT A LOT OF DIFFERENT EMAILS, YOU CRIMINALS**
23 **CANNOT BLOCK ME!]**

24
25 221. On Saturday, June 8, 2024, at 11:28 AM, Defendants Gavin Christopher Newsom
26 (gavin.newsom@gov.ca.gov), Leah Tamu Wilson (leah.wilson50@yahoo.com)

27 leah.wilson@calbar.ca.gov) Robert Andres Bonta (robert.bonta@doj.ca.gov, Peter
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 Dwight Halloran (peter.halloran@doj.ca.gov), Dennis L. Beck Jr.
2 (dennis.beck@doj.ca.gov), Jennifer Benavidez (jennifer.benavidez@ceder.ca.gov), George
3 Gascón (ggascon@da.lacounty.gov), Jeffrey A. Macomber
4 (jeff.macomber@ceder.ca.gov), Jason D. Johnson (jason.johnson@ceder.ca.gov), Jennifer
5 Barretto (jennifer.barretto@ceder.ca.gov), Ronald Broomfield
6 (ron.broomfield@ceder.ca.gov), Tammatha Foss (tanmy.foss@ceder.ca.gov), Christopher
7 Chambers (chris.chambers@ceder.ca.gov), over one hundred County of Los Angeles criminal
8 prosecutors and State Bar licensed attorneys, and DOES 1-10 all received an email
9 containing detailed facts and allegations that described how County of Los Angeles
10 deputy district attorney **Cindy Juhyun Park (SBN # 271933)**, Thomas Leo Guzman-
11 Sanchez and County of Los Angeles willfully, knowingly, recklessly, carelessly, wantonly,
12 maliciously, and callously framed KING AROGANT by recklessly presenting to a Superior
13 Court of California criminal courtroom phony and bogus fabricated oral testimony evidence that
14 KING AROGANT made a criminal threat to Thomas Leo Guzman-Sanchez in late October
15 2023. Near the beginning of his detailed email, KING AROGANT typed the following:

16
17 **In direct violation of California Penal Code Section 745 the People**
18 **and Sanchez presented to the Superior Court false testimony on**
19 **January 12, 2024 that AROGANT had made a criminal threat to**
20 **Sanchez by during their only telephone call in October 23, 2023**
21 **AROGANT stated "he would fuck him up", and to which Sanchez**
22 **told AROGANT that that was a threat and he would report him."**

23 **THE ACTUAL TRANSCRIPT OF THE TELEPHONE CONVERSATION**
24 **PROVES THAT AROGANT DID NOT THREATEN SANCHEZ, PROVES**
25 **THAT SANCHEZ TESTIFIED FALSELY AND RECKLESSLY AND HE**
26 **VIOLATED CALIFORNIA GOVERNMENT CODE SECTION 6200; AND**
27 **IT PROVES THAT THE PEOPLE, VICTOR MANUEL RODRIGUEZ (SBN**
28 **# 156150), AND CINDY JUHYUN PARK (SBN # 271933) SOUGHT A**

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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED

1 **RACIST SENTENCING CONVICTION OF AROGANT HOLLYWOOD**
2 **AFTER THEY HAD NO POLICE REPORT, NO ARREST REPORT, NO**
3 **CHARGES EVER FILED, AND STALE ALLEGATIONS OVER ONE**
4 **MONTH OLD IN WHICH SANCHEZ STATED HE WOULD REPORT**
5 **AROGANT. IMPORTANT NOTE. THE BELOW ORIGINAL AUDIO**
6 **RECORDING WAS PLAYED LIVE FOR ROGUE AND BIASED PEACE**
7 **OFFICER FERNANDO ALVAREZ DURING A HOME VISIT IN MAY**
8 **2024.**

9 Near the end of his detailed email, KING AROGANT typed the following

10 **THE PEOPLE AND THE EMAILED COUNTY OF LOS**
11 **ANGELES CRIMINAL PROSECUTORS AND COUNTY**
12 **COUNSEL MEMBERS NOT ONLY SOUGHT A**
13 **RACIST CONVICTION BUT THEY DID SOUGHT A**
14 **RACIST AND WRONGFUL SENTENCING AND**
15 **RIGGED FELONY PROBATION REVOCATION THAT**
16 **ENDED UP GETTING AROGANT HOLLYWOOD**
17 **WRONGFULLY SENT TO A CALIFORNIA STATE**
18 **PRISON AND THEN PLACED ON THREE YEARS OF**
19 **PAROLE SUPERVISION FOR A CRIME HE DID NOT**
20 **COMMIT, AND FOR CONDUCT HE DID NOT**
21 **ENGAGE IN WITH FAKE VICTIMS JENNIFER**
22 **HUTTON-HEGER AND THOMAS LEO GUZMAN-**
23 **SANCHEZ.**

24
25
26
27
28
U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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 **MOREOVER, SANCHEZ'S SINISTER AND RACIST LAUGH**
2 **THROUGHOUT HIS TELEPHONE CONVERSATION THAT HE WAS**
3 **GOING TO REPORT AROGANT AND THEN HIM COMING TO COURT**
4 **LYING ON THE STAND, PROVE HE NOT ONLY LIED, BUT HE CAME**
5 **UP WITH A PLAN TO LIE AND GET AROGANT SENT BACK TO**
6 **PRISON. JUST ALONE WITH THE EVIDENCE IN THIS EMAIL AND**
7 **THE MATCHING TRANSCRIPTS OF GUZMAN-SANCHEZ THERE IS**
8 **ENOUGH EVIDENCE TO OVERTURN AROGANT'S CONVICTION**
9 **BASED ON SANCHEZ'S INTENTIONAL FALSE TESTIMONY ALONE!**

9 222. All emailed Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert
10 Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, Jeffrey A.
11 Macomber , Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers,
12 Jennifer Benavidez Ronald Broomfield, & DOES 1-10 received FAIR NOTICE that the
13 County of Los Angeles and its criminal prosecutors (**specifically Cindy Park but not all**
14 **limited to her**) framed KING AROGANT on January 12, 2024 by allowing state
15 government witness Thomas Leo Guzman-Sanchez to recklessly testify falsely that
16 KING AROGANT made a criminal threat to him in late October 2023. Yet, as of October
17 31, 2024, all emailed Defendants Gavin Christopher Newsom, Leah Tamu Wilson,
18 Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, Jeffrey
19 A. Macomber , Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers,
20 Jennifer Benavidez, Ronald Broomfield, & DOES 1-10 have all willfully, knowingly,
21 recklessly, carelessly, wantonly, maliciously, and callously with under color of law
22 deliberate indifference to the federally protected constitutional civil rights of KING
23 AROGANT, recklessly failed to do any of the following for nearly four consecutive
24 months after they all were given FAIR NOTICE, and after they all received FAIR
25 NOTICE:
26

27 Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
28 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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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. Respond to KING AROGANT's June 8, 2024 email.
2. Launch an investigation into all KING AROGANT's June 8, 2023 emailed allegations and accusations that claimed the County of Los Angeles District Attorney's Office recklessly falsified evidence inside a criminal Superior Court of California, which was in direct violation of California Government Code § 6200
3. Immediately terminate KING AROGANT's State of California felony parole supervision.

223. CDCR Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, & DOES 1-10 to immediately terminate KING AROGANT's felony parole, which they all had the power to do. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, & DOES 1-10 all committed reckless under color of FRAUD, reckless under color of law DECEIT, and reckless under color of law Fourteenth Amendment Due Process Clause constitutional violations by recklessly failing to help KING AROGANT by immediately terminating his unconstitutional and unlawful felony parole supervision, and also by Defendants concealing from, hiding, failing to disclose, and failing to otherwise inform Superior Court of California, County of Los Angeles, Alhambra Superior Court, Department 1 that they were all electronically served a short 911 audio recording that proved by clear and convincing evidence that the following had occurred:

- 1, California State Government Witness Thomas Leo Guzman-Sanchez willfully, knowingly, carelessly, maliciously, wantonly, and callously violated California Government Code § 6200
2. County of Los Angeles criminal prosecutors recklessly allowed RACIST SANCHEZ to testify falsely that KING AROGANT threatened to physically harm him in late October 2023.

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 JUDICIAL ABUSE OF PROCESS, 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 3. KING AROGANT was wrongfully sent to California state prison based on
2 RACIST SANCHEZ's false testimony that KING AROGANT made a criminal
3 threat.
4

5 224. On information and belief, Defendants Gavin Christopher Newsom, Leah Tamu
6 Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Jeffrey A.
7 Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers,
8 Jennifer Benavidez, Ronald Broomfield, & DOES 1-10 between June 8, 2024, and
9 October 31, 2024, willfully, knowingly, maliciously, wantonly, carelessly, and callously
10 had a meeting of minds with Defendant George Gascón and other named and unnamed
11 County of Los Angeles District Attorney's Office employees and attorneys to violate
12 KING AROGANT's constitutional civil rights by doing all the aforementioned and by
13 staying silent while condoning, tolerating, acquiescing, consenting to, overlooking,
14 permitting, and otherwise continuing to allow County of Los Angeles criminal
15 prosecutors to recklessly frame KING AROGANT by County of Los Angeles and its
16 criminal prosecutors (**specifically Cindy Park but not all limited to her**) recklessly
17 allowing state government witness Thomas Leo Guzman-Sanchez to knowingly and
18 maliciously testify falsely that KING AROGANT made a criminal threat to him in late
19 October 2023. Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert
20 Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, Jeffrey A.
21 Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers,
22 Jennifer Benavidez, Ronald Broomfield, & DOES 1-10 all willfully, knowingly,
23 carelessly, wantonly, maliciously, and callously violated the United States Constitution
24 and KING AROGANT's United States Fourteenth Amendment Due Process Clause
25 constitutional civil rights, and they all committed reckless under color of law FRAUD
26 and reckless under color of law DECEIT by recklessly hiding from Superior 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 JUDICIAL ABUSE OF PROCESS, 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 California, County of Los Angeles, Alhambra Superior Court, Department 1, the fact that
2 they had been electronically served a short 911 audio recording that proved by clear and
3 convincing evidence KING AROGANT's factual innocence. Defendants Leah Tamu
4 Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George
5 Gascón, & DOES 1-10 all had a prosecutorial duty and obligation to aid and assist KING
6 AROGANT with immediately overturning his wrongful felony conviction pursuant to the
7 **State Bar of California, Rule 3.8, Special Responsibilities of a Prosecutor.**

8 Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L.
9 Beck Jr., George Gascón, and DOES 1-10 all willfully, knowingly, carelessly, wantonly,
10 maliciously, and callously violated **State Bar of California, Rule 3.8, Special**
11 **Responsibilities of a Prosecutor** by being served electronically a short 911 audio
12 recording that proved by clear and convincing evidence KING AROGANT's factual
13 innocence, and then recklessly ignoring that electronically served exculpatory evidence
14 by neglecting their legal duty and legal obligation as criminal prosecutors to aid and
15 assist KING AROGANT with overturning his wrongful conviction, in direct violation of
16 State Bar of California Rule 3.8 and American Bar Association, Rule 3.8.

17
18 225. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha
19 Foss, Christopher Chambers, Jennifer Benavidez, Ronald Broomfield, & DOES 1-10 all
20 willfully, knowingly, carelessly, wantonly, maliciously, and callously violated the United
21 States Constitution and KING AROGANT's United States Fourteenth Amendment Due
22 Process Clause constitutional civil rights, and they all committed reckless under color of
23 law FRAUD, reckless under color of law DECEIT, and under color of law NEGLECT to
24 their legal obligation and legal duty to aid and assist with immediately terminating KING
25 AROGANT's unlawful and unconstitutional felony parole supervision by recklessly
26 hiding from Superior Court of California, County of Los Angeles, Alhambra Superior

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 Court, Department 1 the fact that they had been electronically a short 911 audio recording
2 that proved by clear and convincing evidence KING AROGANT's factual innocence, and
3 thus Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha
4 Foss, Christopher Chambers, Jennifer Benavidez, Ronald Broomfield, & DOES 1-10 were
5 all legally obligated pursuant to California Penal Code § 1170, subdivision (d) to file
6 papers in the Superior Court of California, County of Los Angeles Alhambra Superior
7 Court immediately, requesting and recommending that KING AROGANT's felony
8 parole supervision be terminated immediately.

9
10 226. Attached as electronic mail attachments at the end of KING AROGANT's June 8,
11 2024 email was a Gmail Scanned Windows Waveform Audio File Format (wav) audio
12 recording titled PROOF OF RACIST EXPERT TESTIMONY.wav. See now a true and
13 correct of KING AROGANT's June 8, 2024 email regarding fabricated testimony of
14 California State government witness RACIST SANCHEZ attached as Exhibit ___ of
15 KING AROGANT's Verified Appendix of Exhibits.

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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 **E. DEFENDANTS GAVIN CHRISTOPHER NEWSOM, ROBERT ANDRES**
2 **BONTA, PETER DWIGHT HALLORAN, DENNIS L. BECK JR., LEAH**
3 **TAMU WILSON, & GEORGE GASCÓN ALL RECEIVED FAIR NOTICE**
4 **AND WERE ALL GIVEN FAIR NOTICE THAT COUNTY OF LOS**
5 **ANGELES CRIMINAL PROSECUTORS AND LYING STATE**
6 **GOVERNMENT WITNESSES SENT KING AROGANT TO CALIFORNIA**
7 **STATE PRISON BY RECKLESSLY VIOLATING KING AROGANT'S**
8 **CONSTITUTIONAL CIVIL RIGHTS PURSUANT TO CALIFORNIA**
9 **PENAL CODE § 745, HENRY NAPUE V. ILLINOIS AND THE DUE**
10 **PROCESS CLAUSE OF THE FOURTEENTH AMENDMENT OF UNITED**
11 **STATES CONSTITUTION AND THEIR FAILURE TO AID AND ASSIST**
12 **KING AROGANT WITH OVERTURNING HIS RACIST, BIASED,**
13 **UNCONSTITUTIONAL AND ILLEGAL FELONY CONVICTION**
14 **BETWEEN NOVEMBER 28, 2023, AND JANUARY 31, 2024, RESULTED**
15 **IN COUNTY OF LOS ANGELES, CRIMINAL PROSECUTOR**
16 **RECKLESSLY FRAMING KING AROGANT ON FEBRUARY 2, 2024,**
17 **USING PHONY AND BOGUS LASD-CREATED GOPRO VIDEO**
18 **RECORDINGS GLO10586 & GLO10587 & RECKLESSLY FABRICATED**
19 **AND FALSE SUPERIOR COURT ORAL TESTIMONY OF BRIAN MARK**
20 **ROSENBERG,**

21 227. Plaintiff KING AROGANT hereby restates, realleges, reiterates, reincorporates,
22 and incorporates by reference previous paragraphs 1-226 of this original civil rights
23 complaint.

24 228. On January 15, 2024, KING AROGANT forwarded the same November 23, 2023
25 email that contained detailed facts and allegations that rogue County of Los Angeles
26 prosecutors Brian MARK Rosenberg and Victor Manuel Rodriguez and County of Los
27 Angeles willfully, knowingly, recklessly, carelessly, wantonly, maliciously, and callously
28 violated KING AROGANT's constitutional civil rights by recklessly presenting and
admitting into Superior Court of California, County of Los Angeles, Alhambra Superior

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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

1 Court, Department 1 phony and bogus LASD-created GoPro video recordings GX010586
2 and GX010587 that depicted and displayed KING AROGANT shutting off his GoPro
3 camera inside of the now deceased FAKE VICTIM Jennifer Hutton Heger's home on
4 February 21, 2023, wearing different clothing than he had on February 21, 2023. See
5 KING AROGANT's January 15, 2024, email that was sent to Defendants Gavin
6 Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran,
7 Dennis L. Beck Jr., George Gascón, and DOES 1-10 attached as Exhibit ___ of KING
8 AROGANT's Verified Appendix of Exhibits. All emailed Defendants were given FAIR
9 NOTICE and received FAIR NOTICE that County of Los Angeles criminal prosecutors,
10 County of Los Angeles District Attorney's Office, County of Los Angeles Sheriff's
11 Department, and County of Los Angeles had recklessly framed KING AROGANT for a
12 serious and violent felony they all knew KING AROGANT never committed. Yet as of
13 October 31, 2024, Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert
14 Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-
15 10 have all willfully, recklessly, carelessly, maliciously, wantonly, and callously with
16 under color of law deliberate indifference to the federally protected civil rights of KING
17 AROGANT recklessly failed to do any of the following for nearly nine consecutive
18 months after the above-stated Defendants were given FAIR NOTICE and received FAIR
19 NOTICE:

- 20 1. Respond to KING AROGANT's January 15, 2024 email.
- 21 2. Request that County of Los Angeles criminal prosecutors involved with frivolous criminal
22 case GA114055 turn over and disclose to them all sixteen GoPro video recordings
23 recklessly presented at the preliminary hearing held on April 4, 2023, and April 5, 2023,
24 and especially phony LASD-created GoPro video recordings GLO10586 and GLO10587
25 that depicted and displayed KING AROGANT shutting off his GoPro camera with a bare
26 right arm.

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 JUDICIAL ABUSE OF PROCESS, 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 3. Immediately request that County of Los Angeles rogue, racist, biased, and dishonest
2 criminal prosecutors Brian MARK Rosenberg and Victor Manuel Rodriguez's recklessly
3 falsified evidence presented inside of the Superior Court of California, County of Los
4 Angeles, Alhambra Superior Court, Department 1 on April 4, 2023, and April 5, 2023
be immediately turned over and disclosed to George Gascón, the Office of George
Gascón, and the office of Attorney General Robert Bonta.
- 5 4. Launch an investigation into all KING AROGANT's January 15, 2024 emailed
6 allegations and accusations that claimed County of Los Angeles District Attorney's
7 Office criminal prosecutors and investigators recklessly falsified evidence inside of a
Superior Court of California Superior Court criminal courtroom.
- 8 5. Request that Victor Manuel Rodriguez and MARK Rosenberg immediately turn over and
9 disclose impeaching and phony LASD-created GoPro video recordings GX010586 and
GX010587.
- 10 6. Request that rogue, racist, biased, and dishonest involved County of Los Angeles
11 criminal prosecutors immediately turn over and disclose copies of impeaching phony
12 LASD-created GoPro video recordings GX010586 and GX010587 in compliance with
13 County of Los Angeles District Attorney's Office's Legal Policies and Procedures,
Chapter 14.
- 14 7. Request that Victor Manuel Rodriguez and MARK Rosenberg immediately turn over and
15 disclose all sixteen GoPro video recordings announced, presented, and admitted into
16 Superior Court of California, County of Los Angeles, Alhambra Superior Court,
17 Department 1 on April 4, 2023 and April 5, 2023, and testified to by rogue peace officer
Lying Billy Khounthavong on April 5, 2023.
- 18 8. Request that Victor Manuel Rodriguez and MARK Rosenberg immediately turn over and
19 Disclose a Hardcopy of a Detailed CAD report showing the exact time each of Jennifer
20 Hutton-Heger's first and second 911 audio recordings commenced and ended.

21 229. On January 12, 2024, KING AROGANT filed a motion to withdraw his guilty plea
22 in the Superior Court of California, County of Los Angeles, Alhambra Superior Court,
23 Department 1 (LASC CASE GA114055), and requested for an evidentiary hearing to be
24 commenced so that his original GoPro video recordings could be played before the
25 Superior Court in hopes of exonerating himself.
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 JUDICIAL ABUSE OF PROCESS, 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**

1 230. On February 2, 2024, rogue, racist, biased, dishonest, prejudiced, and corrupt
2 County of Los Angeles deputy district attorney Brian MARK Rosenberg (SBN # 291501)
3 testified before the Superior Court of California, County of Los Angeles, Alhambra
4 Superior Court while working in collusion with RACIST AND BIASED deputy district
5 attorney Victor Manuel Rodriguez (SBN # 156150), who then simultaneously showed the
6 Superior Court phony LASD-created GoPro video recordings GX010586 and GX010587,
7 both of which, since the date of frivolous criminal case GA114055 being initiated on
8 February 23, 2023. have recklessly, willfully, wantonly, maliciously, and callously never
9 been turned over to co-counsel Neil Opdahl-Lopez (SBN # 277596), private investigator
10 Carlos Anthony Jackson, private investigator Joel Simeone Wyenn, and/or RACIST
11 expert witness Thomas Leo Guzman-Sanchez. At the hearing, Brian MARK Rosenberg
12 told the Superior Court while sworn under oath that phony LASD-created GoPro video
13 recording GX010586 showed KING AROGANT shutting off his GoPro camera. At the
14 hearing, Brian MARK Rosenberg (SBN # 291501) asked KING AROGANT a question
15 on cross-examination: “How did you get to that door right there?”, this question was
16 asked during the playing of phony GoPro video recording GX010587, which falsely
17 showed KING AROGANT walking to the front door of Hutton’s home, never stopping to
18 stand and look at himself in her mirror, and then standing in front of her front door while
19 it was open. The real reason for MARK Rosenberg’s testimony was so that he, Victor
20 Manuel Rodriguez, could extinguish the declaration of Neil Opdahl (SBN # 277596) in
21 which Opdahl declared under the penalty of perjury that the real GoPro video recordings
22 reviewed by him did not show KING AROGANT committing any crime or shutting off
23 his GoPro camera at any time. Thus, pursuant to California State Bar Rules of
24 Professional Conduct Rule 3.8–Special Responsibilities of a Prosecutor. Defendants
25 Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight
26 Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 all had a duty 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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 responsibility to remedy KING AROGANT's wrongful, racist, biased, unconstitutional,
2 unlawful, prejudiced, and illegal criminal felony conviction and overturn it themselves.

3
4 231. At the hearing on February 2, 2024, George Gascón, Victor Manuel Rodriguez,
5 and Brian MARK Rosenberg were able to convince prejudiced judicial officer Michael
6 Villalobos that their manipulated, bogus, and phony LASD-created GoPro video
7 recordings GX010586 and GX010587 were authentic and that KING AROGANT's real
8 GoPro video recordings were spliced and manipulated by KING AROGANT himself
9 after his GoPro camera was returned to him in Superior Court of California, County of
10 Los Angeles, Alhambra Superior Court on October 17, 2023.

11
12 232. All emailed County of Los Angeles and State of California criminal attorneys'
13 reckless failure to abide by State Bar of California Rule 3.8 and American Bar
14 Association Model Rules of Professional Conduct Rule 3.8 proves by clear and
15 convincing evidence that each of the Defendants sued herein in the Eastern District of
16 California, and whom will be later sued in the Northern District of California, were
17 correctly and rightfully sued.

18
19 **233. In Neil Opdahl's declaration, he clearly stated the following:**

20
21 I, Neil Opdahl-Lopez, declare as follows:

- 22
23 1. I am the attorney of record on this case, as co-counsel/standby counsel, along with
24 Mr. Arogant Hollywood in Pro Per.

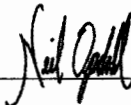
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28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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
- 2 2. After viewing, the uninterrupted and unbroken GoPro video footage, of 21
- 3 February 2023, as worn on the chest of Arogant Hollywood, it is clear that
- 4 from the beginning of the video, through the arrival of law enforcement, that there
- 5 is little to no interactions between the alleged victim, and the defendant in
- 6 question.
- 7
- 8 3. Mr. Hollywood never shut off the GoPro, once he began recording, in the front
- 9 yard of the victim. The MP4 video footage continues as one linear piece of footage
- 10 without intervention, from the alleged victim interacting with the Uber drive in the
- 11 front yard, until law enforcement arrives.
- 12
- 13 4. Mr. Hollywood never actually physically confronts the alleged victim in the
- 14 living room.
- 15
- 16 5. The alleged victim is never seen in any of the footage once inside the
- 17 home.
- 18
- 19 6. The alleged victim is only ever seen in the front yard, at the initial video,
- 20 and only calls 911 after telling Mr. Hollywood that she would be doing so.
- 21
- 22 7. Mr. Hollywood *never* brandishes a knife.
- 23
- 24 8. Mr. Hollywood *never* kicks, punches, or bangs on any doors, or other
- 25 portions of the home once he walks back inside to safeguard his personal
- 26 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 JUDICIAL ABUSE OF PROCESS, 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 9. Moreover, Mr. Hollywood never verbalizes any criminal threat to the
2 alleged victim.

3
4 10. Near the end of the 14:43 minute video, an unknown officer shuts off the
5 GoPro camera, as Mr. Hollywood stood handcuffed.

6
7 By:  _____

8
9 Neil Opdahl-Lopez

10 Date: 12 January 2023

11
12 See now a true and correct copy of Neil Opdahl-Lopez's declaration for January 12,
13 2024, which was incorrectly dated by him for January 12, 2023, attached as Exhibit
14 _____ of KING AROGANT's Verified Appendix of Exhibits, and also see Neil
15 Opdahl-Lopez's declaration below:
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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IED**

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Neil Opdahl, SBN: 277596
Major, USMCR
473 East Carnegie Drive, #200
San Bernardino CA 92408
Telephone 626.429.6578
Facsimile: 888.298.7284
Email: attorney@neilopdahl.com

Co-Counsel for Arogant Hollywood

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
THE COUNTY OF LOS ANGELES**

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

vs.

AROGANT HOLLYWOOD

Defendant.

CASE NO. GA114055

DECLARATION OF NEIL OPDAHL-LOPEZ
IN SUPPORT OF EVIDENTIARY HEARING

I, Neil Opdahl-Lopez, declare as follows:

1. I am the attorney of record on this case, as co-counsel/standby counsel, along with Mr. Arogant Hollywood in Pro Per.
2. After viewing, the uninterrupted and unbroken GoPro video footage, of 21 February 2023, as worn on the chest of Arogant Hollywood, it is clear that from the beginning of the video, through the arrival of law enforcement, that there is little to no interactions between the alleged victim, and the defendant in question.

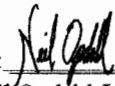
DECLARATION OF NEIL OPDAHL

DECLARATION OF NEIL OPDAHL-LOPEZ, 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, HED, & NEGLIGENT HED

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3. Mr. Hollywood never shut off the GoPro, once he began recording, in the front yard of the victim. The MP4 video footage continues as one linear piece of footage without intervention, from the alleged victim interacting with the Uber drive in the front yard, until law enforcement arrives.
4. Mr. Hollywood never actually physically confronts the alleged victim in the living room.
5. The alleged victim is never seen in any of the footage once inside the home.
6. The alleged victim is only ever seen in the front yard, at the initial video, and only calls 911 after telling Mr. Hollywood that she would be doing so.
7. Mr. Hollywood *never* brandishes a knife.
8. Mr. Hollywood *never* kicks, punches, or bangs on any doors, or other portions of the home once he walks back inside to safeguard his personal property.
9. Moreover, Mr. Hollywood never verbalizes any criminal threat to the alleged victim.
10. Near the end of the 14:43 minute video, an unknown officer shuts off the GoPro camera, as Mr. Hollywood stood handcuffed.

By: 
Neil Opdahl-Lopez
Date: 12 January 2023

DECLARATION OF NEIL OPDAHL

AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENCE IIED

1 234. Defendant George Gascón willfully, knowingly, recklessly, wantonly, maliciously,
2 and callously allowed rogue County of Los Angeles criminal prosecutors Victor Manuel
3 Rodriguez and Brian MARK Rosenberg to not only testify falsely but also present and
4 admit into Superior Court of California, County of Los Angeles, Alhambra Superior
5 Court, Department 1 phony and bogus LASD-created GoPro video recordings GX010586
6 and GX010587 a third time (phony video recordings were also presented and admitted as
7 false evidence on April 4, 2024 and April 5, 2024). It was a very brazen act for Defendant
8 George Gascón and his rogue County of Los Angeles criminal prosecutors Brian MARK
9 Rosenberg and Victor Manuel Rodriguez to present phony and bogus LASD-created
10 GoPro video recordings GX010586 and GX010587 after criminal defense attorney Neil
11 Opdahl had stated in his declaration that after reviewing KING AROGANT's original
12 GoPro video recording of the February 21, 2023, fake criminal threats incident, he came
13 to a legal conclusion that no crime had occurred on February 21, 2023 (Id. at ¶ 3).

14 Defendant Gascón willfully, knowingly, recklessly, wantonly, maliciously, and callously
15 violated the United States Constitution, and KING AROGANT's Fourteenth Amendment
16 Due Process Clause constitutional rights, and Gascón recklessly violated State Bar of
17 California, Rules of Professional Conduct, Rule 3.8 and American Bar Association's
18 Model Rules of Professional Conduct, Rule 3.8.

19
20 235. On April 5, 2023, RACIST Brian Mark Rosenberg recklessly allowed rogue and
21 dishonest County of Los Angeles peace officer Billy S. Khounthavong to testify falsely to
22 the following:

- 23
24 1. That GoPro video recording GX010586 began at 9:59 AM and ended at 10:06
25 AM (7 minutes in length)

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 JUDICIAL ABUSE OF PROCESS, 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 2. That GoPro video recording GX010587 began at 10:13 AM and ended at 10:15 AM (two
2 minutes in length)
- 3
- 4 3. That GoPro video GX010588 began at approximately 10:13 AM and ended at 10:18 AM
5 (five minutes in length)
- 6
- 7 4. That there was no GoPro video recordings recorded by KING AROGANT between
8 9:59 A M and 10:06 AM
- 9
- 10 5. That KING AROGANT shut off his GoPro camera between 10:06 AM and 10:13 AM,
11 threatened to kill FAKE VICTIM Jennifer Hutton-Heger, and then shut it back on at
12 10:13 AM, and this was the explanation as to why GX010586 ended at 10:07 AM and
13 GX010587 began at 10:13 AM
- 14

15 **LIARS! IT DOES NOT MAKE ANY SENSE!**

16

17 236. Even prior to receiving his GoPro camera back KING AROGANT had already cracked
18 Defendant George Gascón false case. KING AROGANT told the Superior Court of California,
19 County of Los Angeles, Alhambra Superior Court, Department 1 that if the People's three
20 GoPro video recordings totaled 14 minutes, it would have been impossible for KING
21 AROGANT's GoPro camera to have been shut off for six consecutive minutes between 9:59
22 AM and 10:06 AM since Hutton Heger's first 911 call began at approximately 10:01 AM and
23 her second call ended at approximately 10:13 AM, combining the People's 911 audio recordings
24 total time with the People's total time of GoPro video recordings (**GX010586 + 7, GX010587 +**
25 **2, GLO10588 +5 =14 MINUTES**), proves that **KING AROGANT was recording**
26 **continuously even prior to FAKE VICTIM Hutton-Heger ever dialing 911. Under**

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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 **Defendant George Gascón, Brian MARK Rosenberg, and Victor Manuel Rodriguez's legal**
2 **theory of the frivolous, serious, and violent felony case there should only be 8 minutes of**
3 **GoPro recordings total time since KING AROGANT shut off his GoPro camera from 9:59**
4 **AM and 10:06 AM. The fact that there is 14 minutes of total GoPro video recordings and**
5 **Hutton-Heger was on the telephone with 911 from 10:01 AM until all the way up until**
6 **when police arriving at approximately 10:13 A M proves that George Gascón' criminal**
7 **case is false, and it was impossible for KING AROGANT to have shut off his GoPro**
8 **camera for even one minute based on the total time of the three manipulated GoPro video**
9 **recordings presented to the Superior Court of California, County of Los Angeles,**
10 **Alhambra Superior Court, Department 1 on April 4, 2023, April 5, 2023, and February 2,**
11 **2024, which all George Gascón, Brian MARK Rosenberg, and Victor Manuel Rodriguez's**
12 **GoPro video recordings totaling 14 minutes.**

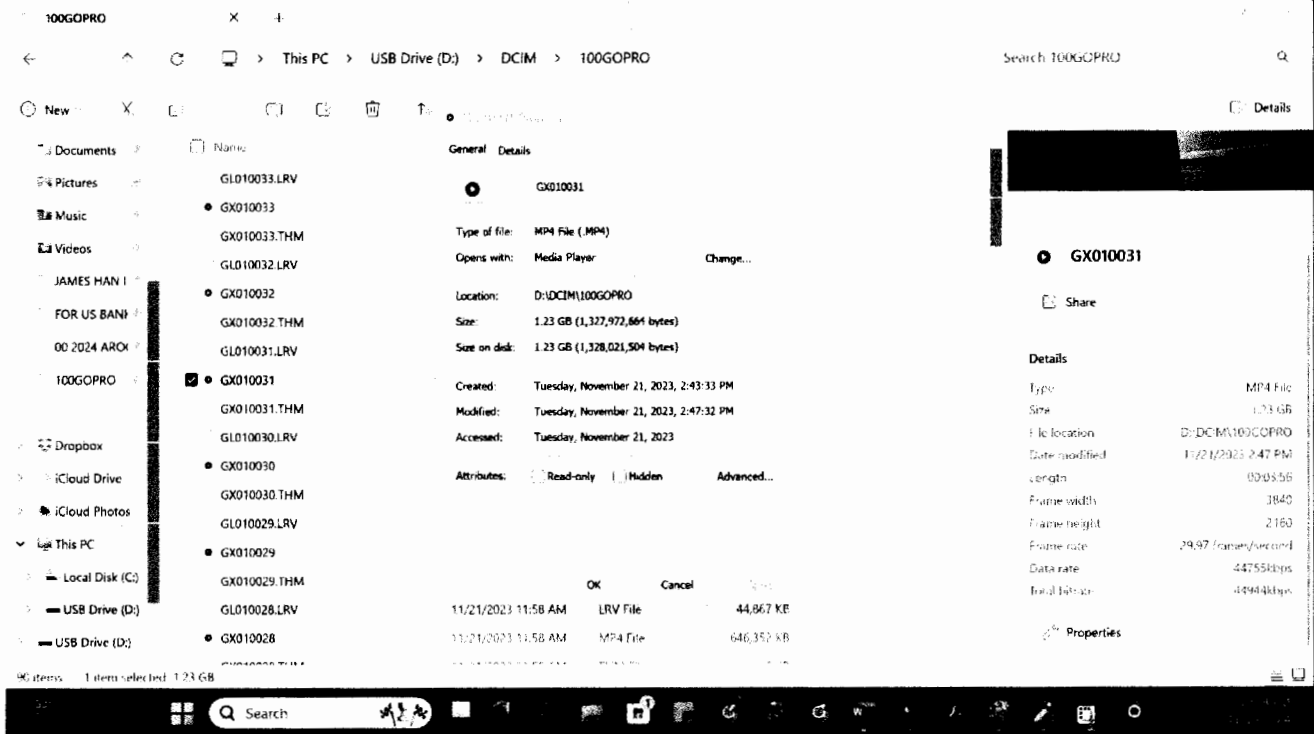
13
14 237. In late October 2023, after being released from custody and receiving his GoPro camera
15 and its 256 GB micro SD card back, he could easily tell that has original GoPro video recording
16 of the incident, GX010586, was manipulated and altered by County of Los Angeles Sheriff's
17 Department's Fraud and Cyber Crimes Bureau's Southern California High Tech Task Force
18 peace officers between February 22, 2023, and March 31, 2023. When comparing the metadata
19 of any of KING AROGANT's original GoPro video recordings to George Gascón phony GoPro
20 video recordings, it is easy to see that George Gascón, Victor Manuel Rodriguez, and Brian
21 MARK Rosenberg's GoPro video recordings were clearly manipulated and altered. The
22 metadata for KING AROGANT's original GoPro video recording GX010031 reads as follows:

23
24 Created: Tuesday, November 21, 2023, 2:43:33 PM

25 Modified: Tuesday, November 21, 2023, 2:47:32 PM

26 Accessed: Tuesday, November 21, 2023

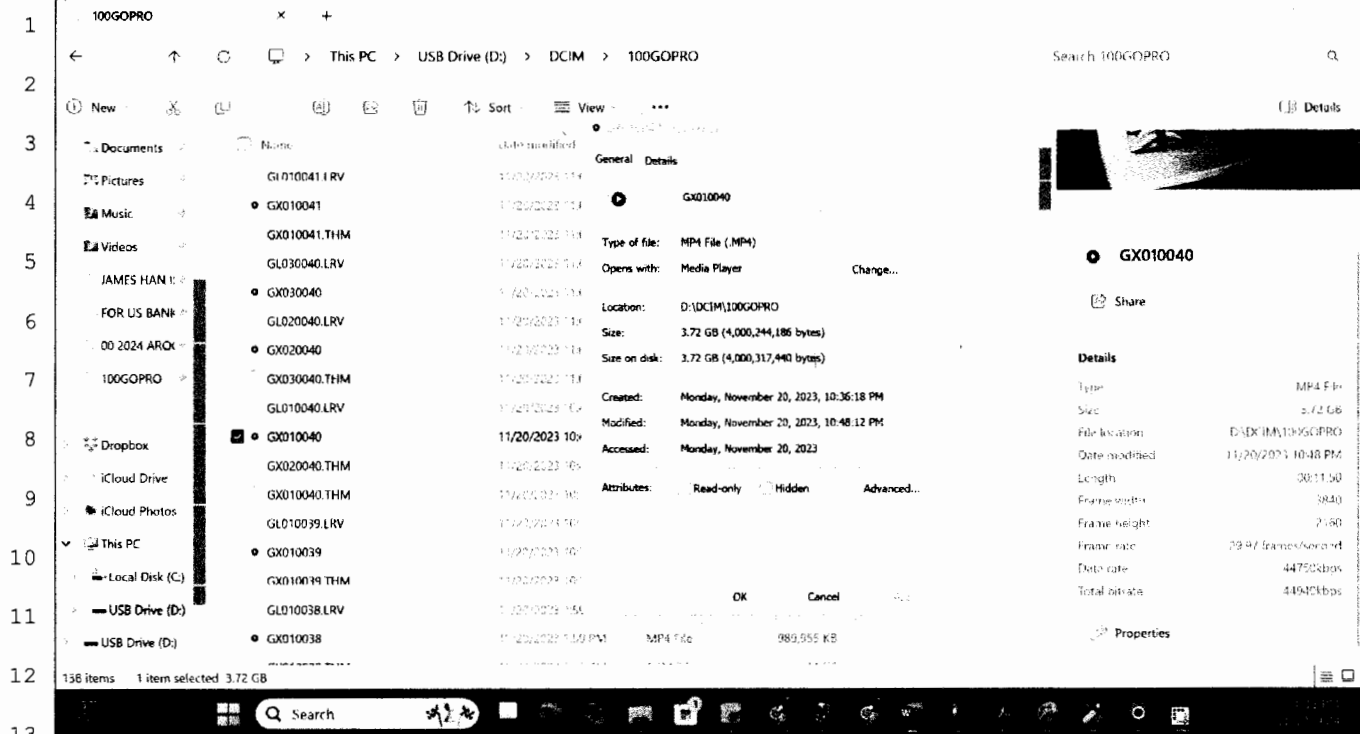
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28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42
U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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**



The metadata for KING AROGANT’s original GoPro video recording GX010040 reads as follows:

Created: Tuesday, November 20, 2023, 10:36:18 PM
 Modified: Tuesday, November 20, 2023, 10:48:12 PM
 Accessed: Tuesday, November 20, 2023

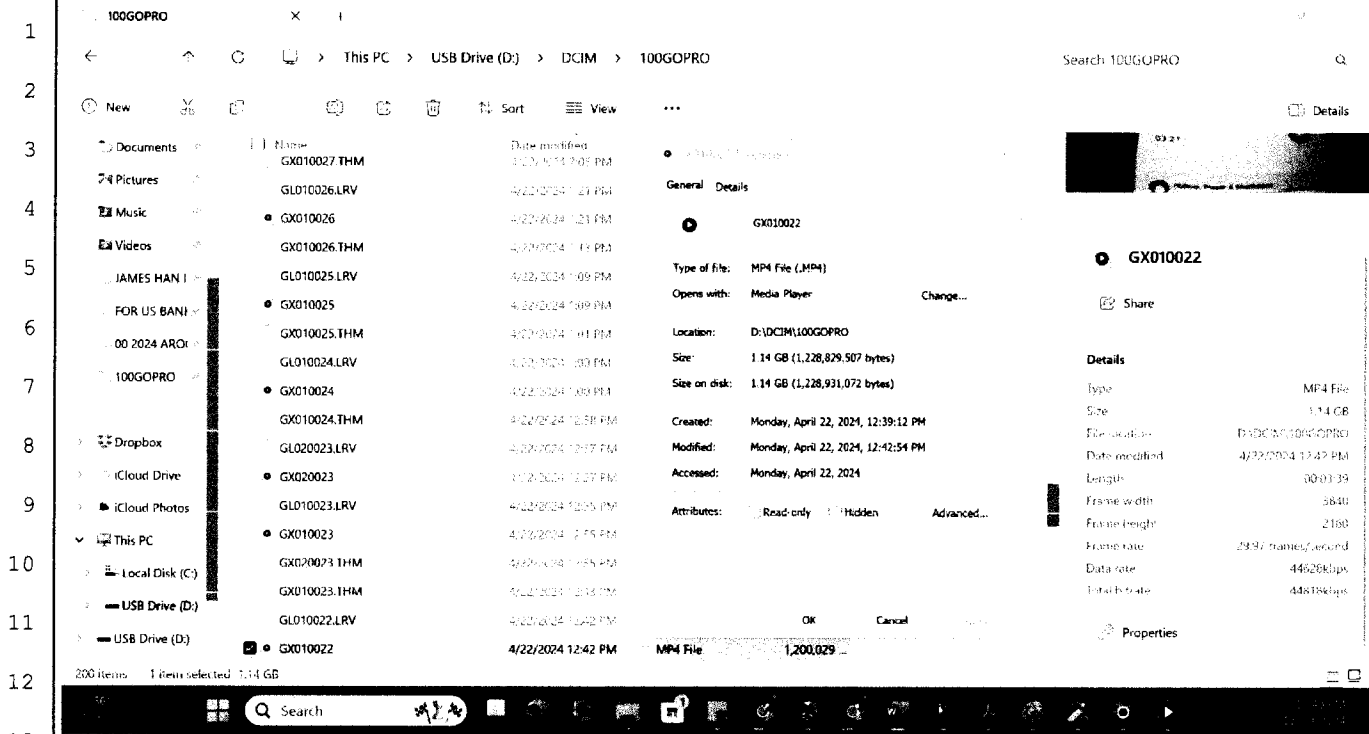
Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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



The metadata for KING AROGANT’s original GoPro video recording GX010031 reads as follows:

Created: Monday, April 22, 2024, 12:39:12 PM
 Modified: Tuesday, April 22, 2024, 12:42:54 PM
 Accessed: Tuesday, April 22, 2024

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 JUDICIAL ABUSE OF PROCESS, 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



238. KING AROGANT did not need a video recording expert to prove that George Gascón, Victor Manuel Rodriguez, and Brian MARK Rosenberg’s GoPro video recordings were tainted, manipulated, altered, edited, and tampered with, which was done for the unlawful purposes of these dishonest criminal prosecutors committing reckless under color of law FRAUD by tricking, fooling, manipulating, fabricating, and otherwise deceiving a criminal Superior Court of California so that it would believe that KING AROGANT was guilty of a hideous and violent crime. George Gascón, Victor Manuel Rodriguez, and Brian MARK Rosenberg all recklessly framed KING AROGANT for and also knew with 100% certainty he never committed on February 21, 2023. Unlike the previous examples of metadata of KING AROGANT’s original GoPro video recordings GX010031, GX010040, and GX010022. George Gascón, Victor Manuel Rodriguez, and Brian MARK Rosenberg’s phony and bogus LASD-created video

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 JUDICIAL ABUSE OF PROCESS, 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
2 recordings do not show metadata that they were accessed on February 21, 2023, which proves a
3 few things:

- 4
- 5 1. The phony LASD-created GoPro video recordings were not recorded and recreated by
6 KING AROGANT.
 - 7
 - 8 2. KING AROGANT's original GoPro video recording GX010586 was recklessly split up
9 and manipulated by County of Los Angeles peace officers into GX010586, GX010587,
10 GX010588, GX010589, and GX010590.
- 11

12 239. It does not matter what the original GoPro video recording is; the metadata for an
13 unmanipulated and original GoPro video recording will always show that it was last accessed on
14 the same exact day it was recorded unless that GoPro video recording was altered, edited, or
15 manipulated.

16

17 The metadata for George Gascón, Victor Manuel Rodriguez, and Brian MARK Rosenberg's
18 phony and bogus LASD-created GoPro video recording GX010586 reads as follows:

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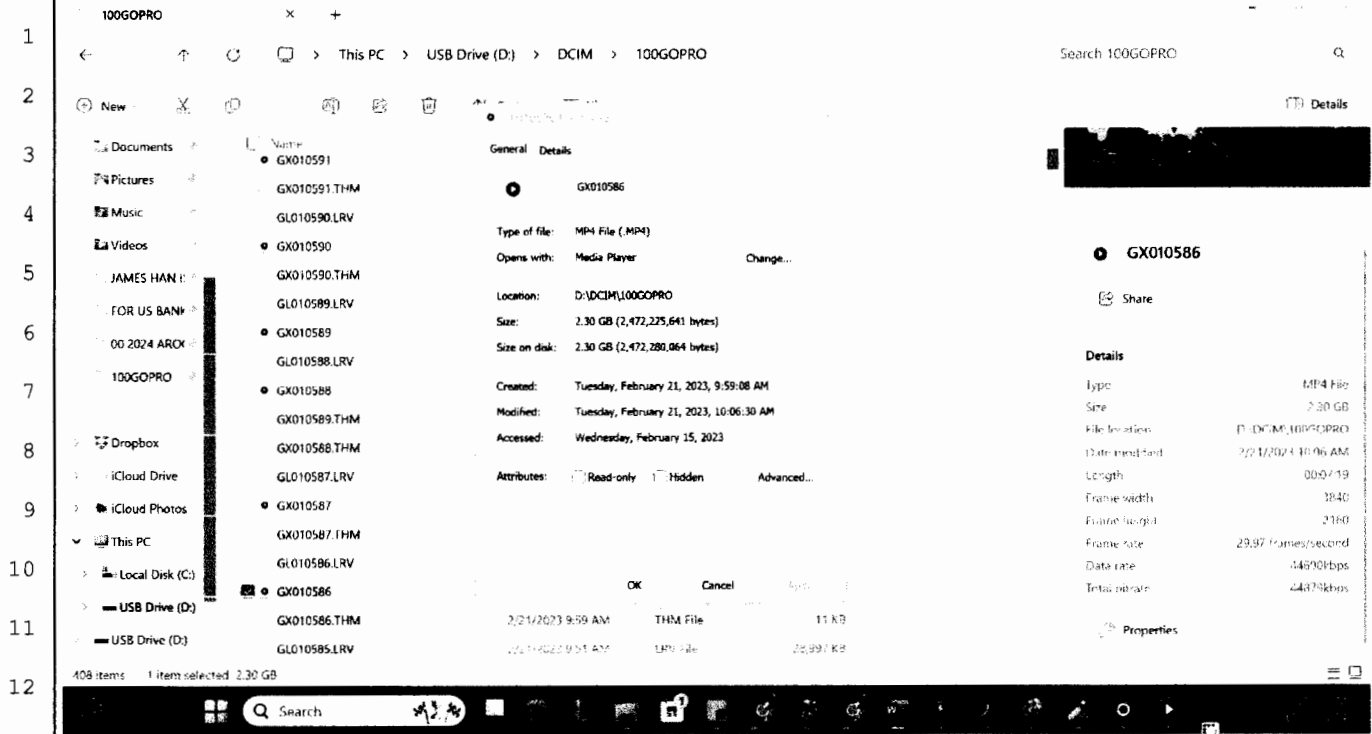
20 Created: Tuesday, February 21, 2023, 9:59:08 AM

21 Modified: Tuesday, February 21, 2023, 10:06:30 AM

22 Accessed: Wednesday, February 15, 2023

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25
26

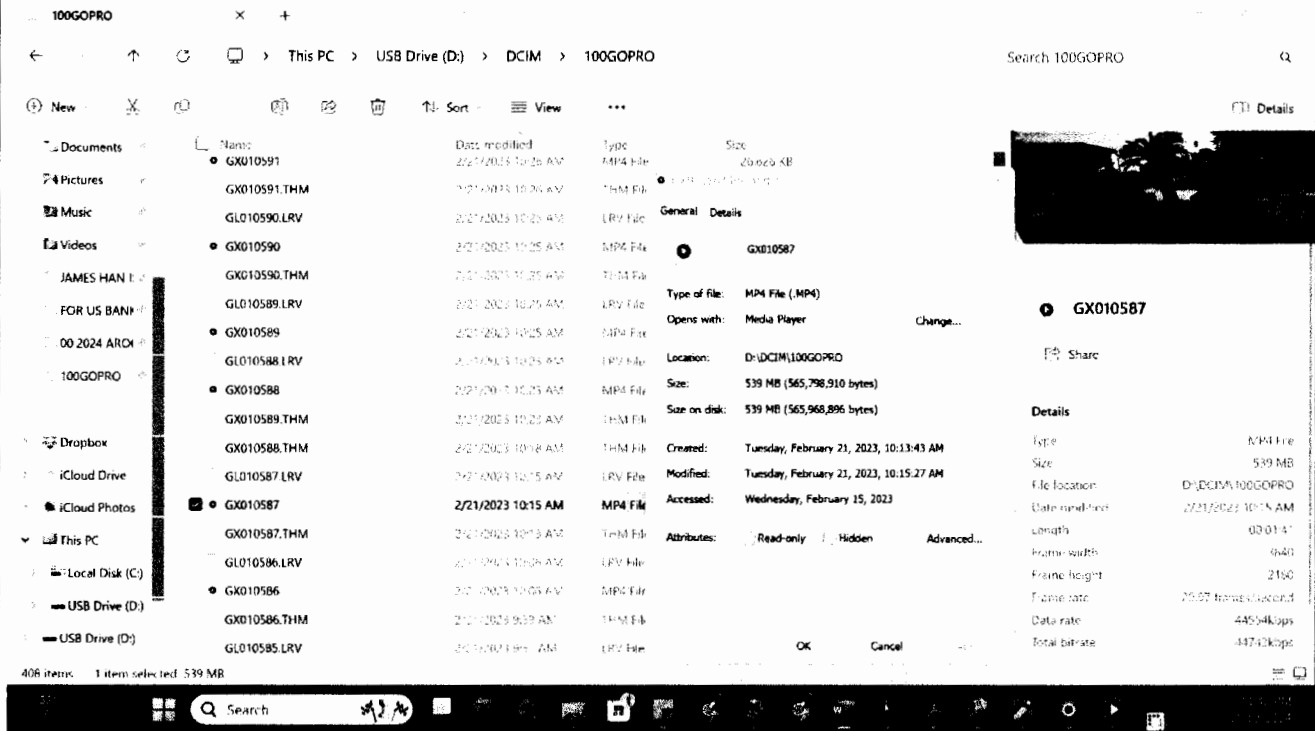
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28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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**



The metadata for George Gascón, Victor Manuel Rodriguez, and Brian MARK Rosenberg’s phony and bogus LASD-created GoPro video recording GX010587 reads as follows:

Created: Tuesday, February 21, 2023, 10:13:43 AM
 Modified: Tuesday, February 21, 2023, 10:15:27 AM
 Accessed: Wednesday, February 15, 2023

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, HIED, & NEGLIGENT HIED



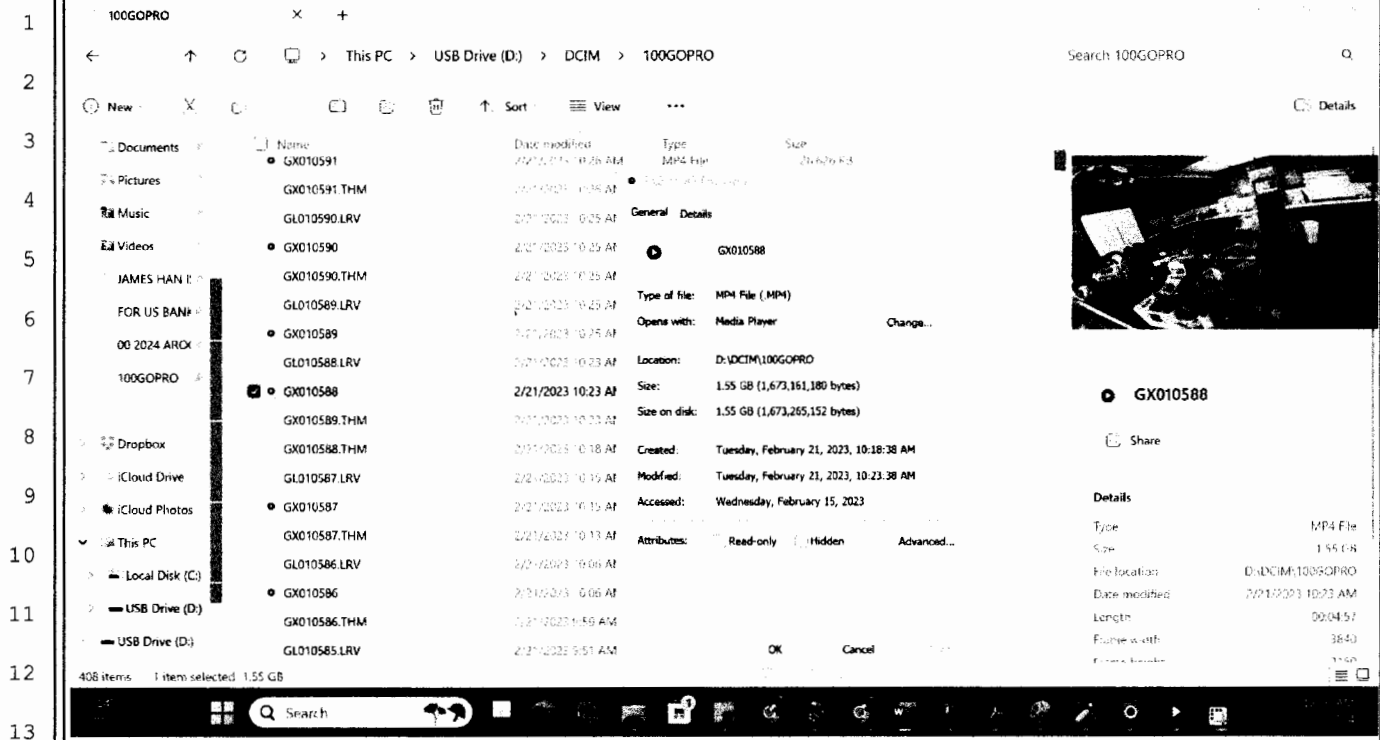
The metadata for George Gascón, Victor Manuel Rodriguez, and Brian MARK Rosenberg’s phony and bogus LASD-created GoPro video recording GX010588 reads as follows:

Created: Tuesday, February 21, 2023, 10:13:43 AM

Modified: Tuesday, February 21, 2023, 10:15:27 AM

Accessed: Tuesday, February 15, 2023

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 JUDICIAL ABUSE OF PROCESS, 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



The metadata for George Gascón, Victor Manuel Rodriguez, and Brian MARK Rosenberg’s phony and bogus LASD-created GoPro video recording GX010589 reads as follows:

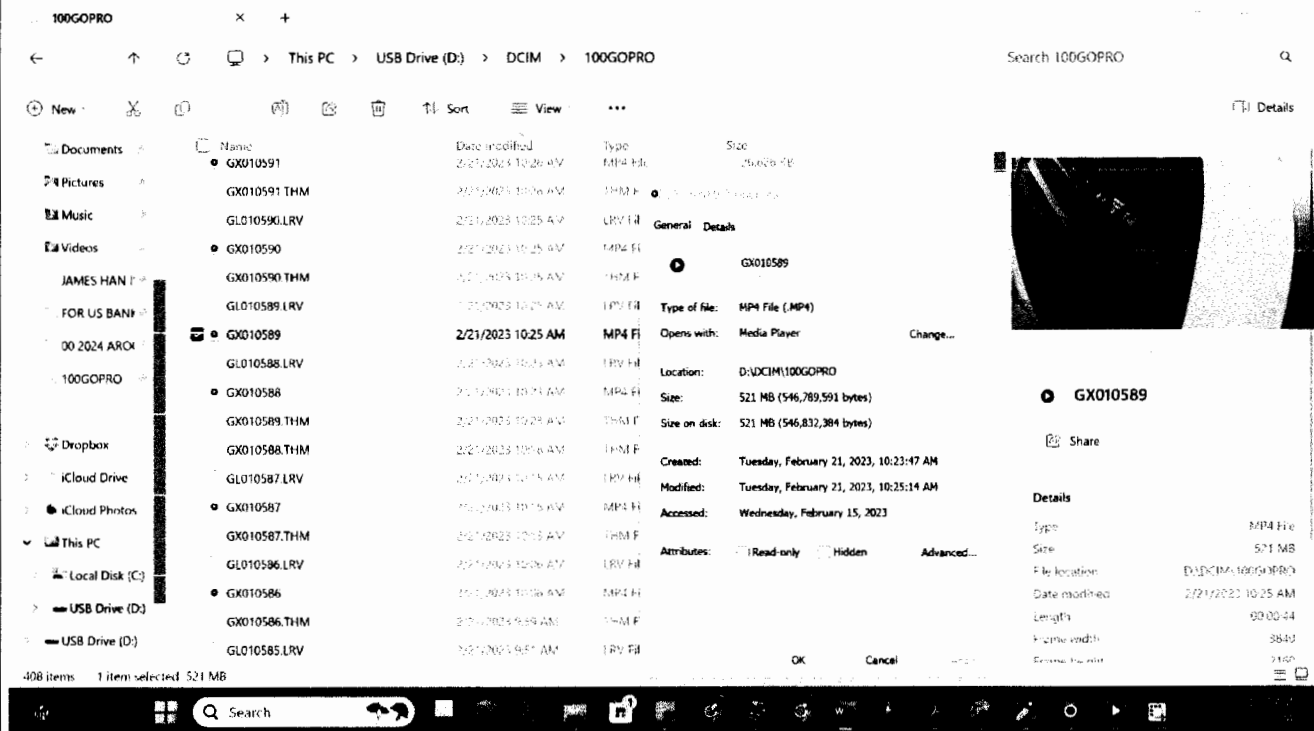
Created: Tuesday, February 21, 2023, 10:23:47 AM

Modified: Tuesday, February 21, 2023, 10:25:14 AM

Accessed: Tuesday, February 15, 2023

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 JUDICIAL ABUSE OF PROCESS, 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

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240. The above metadata evidence for George Gascón, Victor Manuel Rodriguez, and Brian MARK Rosenberg’s phony and bogus LASD-created GoPro video recordings GX010586, GX010587, and GX010588 proves by clear and convincing evidence that KING AROGANT never recorded phony and bogus LASD-created GoPro video recordings GX010586, GX010587, and GX010588 as was falsely testified to by rogue County of Los Angeles peace officer Billy S. Khounthavong on April 5, 2023, in furtherance of County of Los Angeles’s conspiracy to frame KING AROGANT for a violent and serious felony he never committed. When you combine the clear and convincing falsified video recording metadata evidence with George Gascón’s phony and judicially forged probable cause determination, phony and judicially forged search warrant affidavit, disposal of KING AROGANT’s Samsung Galaxy S21 Ultra that contained on it exculpatory text message, and audio recording evidence, fabricated,

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 JUDICIAL ABUSE OF PROCESS, 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 tainted and manipulated 911 audio recordings oral testimony, testimony of LYING FAKE
2 VICTIM Jennifer Hutton'Heger regarding a make-believe knife incident she never reported to
3 911 dispatch or dishonest County of Los Angeles peace officers Aaron D. Contreras and Daniel
4 Esqueda on February 21, 2023, and of course Superior Court of California presentation and
5 admittance of phony LASD-created GoPro video recording GX010586 which contained in it
6 phony and LASD-created and manufactured video frame sequences that depict and display
7 KING AROGANT shutting off his GoPro camera while wearing different clothing than he
8 actually had on February 21, 2023, for which this phony video recording was never turned over
9 to any member of KING AROGANT's legal team between February 23, 2023, and October 31,
10 2024, and was never lodged with the Superior Court of California, County of Los Angeles,
11 Alhambra Superior Court, Department 1 despite it being presented and admitted against KING
12 AROGANT on April 4, 2023, April 5, 2023, and February 2, 2024; PROVES TO ANY
13 UNITED STATES DISTRICT JUDGE REVIEWING THIS CIVIL RIGHTS COMPLAINT.
14 people of the state of california v. ARROGANT HOLLYWOOD, LASC CASE NO.
15 GA114055, is one of the most corrupt, false, baseless, frivolous, and bogus felony criminal
16 cases ever filed in the history of not just the California criminal justice system, but it is also one
17 of the most corrupt felony criminal cases ever filed anywhere in the United States of America.
18 George Gascon, Victor Manuel Rodriguez, and Brian MARK Roseberg's frivolous felony
19 criminal case MAKES NO SENSE BECAUSE:

- 21 1. KING AROGANT is not wearing same clothing he had on February 21, 2023, when he is
22 being seen in phony and bogus LASD-created video recording GL010586.
- 23
24 2. Metadata for George Gascón, Victor Manuel Rodriguez, and Brian MARK Rosenberg's
25 recklessly showing a February 15, 2023, accessed date, which was six days prior to
26 KING AROGANT' false arrest.

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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 JUDICIAL ABUSE OF PROCESS, 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 3. FAKE VICTIM Jennifer Hutton-Heger fabricated lies under oath regarding a detailed
2 knife incident never documented in the police report.
3
- 4 4. Fake probable cause determination intentionally completed on outdated form, and alleged
5 by rogue County of Los Angeles peace officer Aaron D. Contreras to have been approved
6 non telephonically without the required court reporter present.
7
- 8 5. Phony and bogus search warrant in which there was no search warrant number, no return
9 until seven months later, no records of ever being filed at Pasadena Superior Court, no
10 mandatory Countywide Warrant System form completed, and no minute order created for
11 February 22, 2023, judicially forged search warrant.
12
- 13 6. False testimony that FAKE VICTIM Jennifer Hutton-Heger's first 911 called began at
14 10:03 AM and ended at 10:07 A.M., while County of Los Angeles Sheriff's Department
15 Temple City police CAD report proves Hutton-Heger's first 911 call commenced at 10:01
16 AM
17
- 18 7. False testimony that FAKE VICTIM Jennifer Hutton-Heger's second 911 called began
19 at 10:09 AM to 10:10 AM, while County of Los Angeles Sheriff's Department Temple
20 City police CAD report, deputy worksheet of Aaron D. Contreras, and deputy worksheet
21 of Daniel Esqueda all prove that Hutton-Heger's second 911 call commenced at 10:08
22 AM
23

24 241. Pursuant to the horrible allegations and facts made against Defendants Gavin
25 Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran,
26 Dennis L. Beck Jr., George Gascón, and DOES 1-10 in paragraphs 227-241 none of these

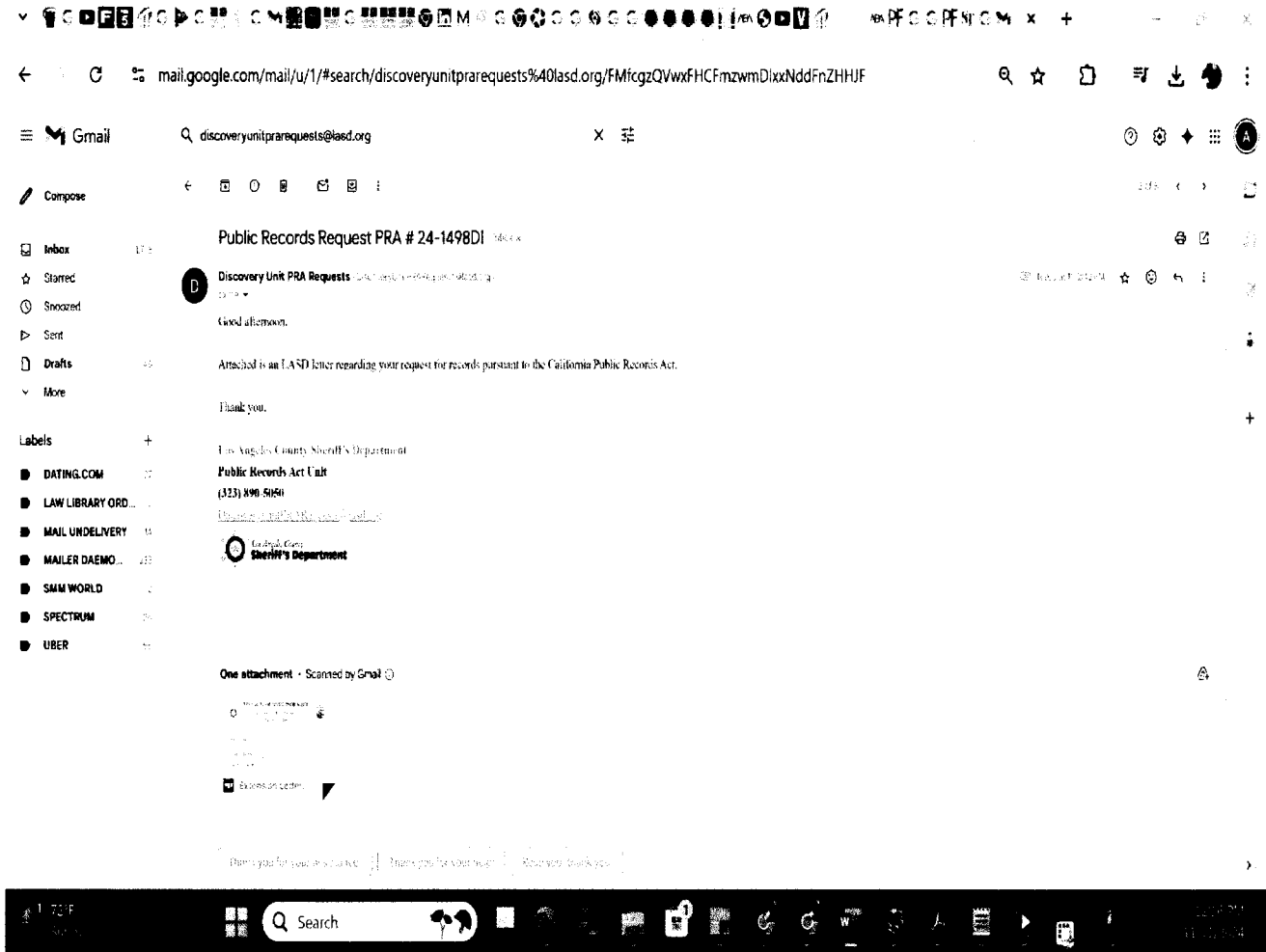
27
28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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 above-stated, named, and accused Defendants are entitled to any type, shape, or form of
2 judicial, electoral, or prosecutorial immunity, and based on allegations of paragraphs 1-
3 240, Defendant Leo Ka Fong Lo is not entitled to any type, shape, or form of peace
4 officer immunity.

5
6 242. Not only did Defendant George Gascón and his rogue County of Los Angeles criminal
7 prosecutors Victor Manuel Rodriguez and Brian MARK Rosenberg recklessly refuse to turn
8 over phony and bogus LASD-created GoPro video recordings GX010586 and GX010587 after
9 being asked, requested, and demanded to do so on numerous occasions. But also County of Los
10 Angeles Sheriff's Department, County of Los Angeles Sheriff's Department Sheriff Robert
11 Luna and his Risk Management Bureau recklessly failed to turn over phony GoPro video
12 recordings GX010586 and GX010587, also sought to conceal the phony and bogus LASD-
13 created GoPro video recordings in furtherance of Los Angeles County's conspiracy to continue
14 frame KING AROGANT for a humiliating, embarrassing, horrible, serious, and violent crime it
15 knew with 100% certainty that KING AROGANT never committed.

16
17 243. On June 10, 2024, KING AROGANT contacted the County of Los Angeles Sheriff's
18 Department's Discovery Unit by dialing the unit at (323) 890-5050 and requested over the
19 telephone that it turn over and provide KING AROGANT with a copy of the phony and bogus
20 LASD-created GoPro video recordings GL010586 and GL010587. See now LASD's Discovery
21 Unit's email to KING AROGANT acknowledging his telephonic request attached as Exhibit ____
22 of KING AROGANT's Verified Appendix of Exhibits, and also below.

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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 JUDICIAL ABUSE OF PROCESS, 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**



244. On June 11, 2024, County of Los Angeles Sheriff's Department peace officer captain Julia M. Valdes responded to KING AROGANT's June 2024 demand that County of Los Angeles Sheriff's Department immediately turn over and disclose phony GoPro video recordings GL010586 and GL010587. While rogue DDA Brian MARK Rosenberg had incorrectly stated and announced KING AROGANT's manipulated GoPro video recordings as GL010586, GL010587, and GL010588 on KING AROGANT's 256 gigabyte micro SD card the video recordings are called GX010586 and GX010587. Captain Valdes requested additional

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 JUDICIAL ABUSE OF PROCESS, 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 time for the Office of Sheriff Robert Luna to review KING AROGANT's public records
2 request. See now a true and correct copy of Office of the Sheriff's response to KING
3 AROGANT's public records request attached as Exhibit _____ of KING AROGANT's
4 Verified Appendix of Exhibits, and also see a copy of it below.

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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IED**

OFFICE OF THE SHERIFF



COUNTY OF LOS ANGELES

HALL OF JUSTICE



ROBERT G. LUNA, SHERIFF

June 11, 2024

Arogant Hollywood
aroganthollywoodgenious@gmail.com

Dear Mr. Hollywood:

PUBLIC RECORDS ACT REQUEST #24-1498DI

This letter is in response to your request for records under the California Public Records Act (CPRA) dated and received by the Los Angeles County Sheriff's Department (LASD), Public Records Act Unit on June 10, 2024.

In your request, you are seeking the following:

...Requesting GO PRO videos related to arrest on 2/21/23, booking #6665970. On 02/23/23, the videos were turned over to the LASD Fraud and Cyber Crimes Bureau Southern California High Tech Task Force. Videos should be in possession with LASD Det. Leo K. Lo. Requesting all 16 videos related to the incident, specifically GLO10586 which shows him turning off the Go Pro , and GLO10587 where it shows his reflection in the mirror.

Although the Sheriff's Department is obligated to respond within 10 days of receipt of the request, this time limit is subject to an extension of up to fourteen (14) days under the following circumstances as defined in Government Code § 7922.535(a).

The need to search for, and collect, the requested records from field facilities or other establishments that are separate from the office processing the request, and the need to appropriately examine potentially voluminous amounts of records.

Currently, the Los Angeles County Sheriff's Department is receiving an exceptionally large volume of PRA requests and is currently experiencing an extended delay in processing them. Upon completion, we will advise you, if any, as to the availability of the responsive records.

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

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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 JUDICIAL ABUSE OF PROCESS, 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, HED, & NEGLIGENT HED

Arogant Hollywood
PRA #24-1498DI

-2-

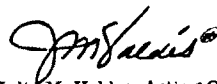
June 11, 2024

Please note that we may redact or withhold records if there are any exempt matters impacting the privacy rights of individuals (California Constitution, article I, §1, and Government Code §§ 7927.706 and 7922.000). Other exempt matters will include those protected by the attorney-client, official information, and deliberative process privileges, pending litigation exemption, personnel exemption, or other matters otherwise protected from disclosure by law or where the particular facts and circumstances warrant nondisclosure of the information (Government Code §§ 7927.200, 7927.700, 7927.705, and 7922.000).

If you have any questions, please contact the Public Records Act Unit via email at DiscoveryUnitPRArequests@lasd.org or phone at (323) 890-5050.

Sincerely,

ROBERT G. LUNA, SHERIFF



Julia M. Valdes, Acting Captain
Risk Management Bureau

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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 245. On June 27, 2024 County of Los Angeles peace officer captain Julia M. Valdes and her
2 sheriff Robert G. Luna willfully, knowingly, recklessly, maliciously, wantonly, and callously
3 violated KING AROGANT's United States Fourteenth Amendment constitutional civil rights by
4 recklessly failing to disclose and turn over copies of phony and bogus LASD-created GoPro
5 video recordings to KING AROGANT. In her frivolous rejection letter County of Los Angeles
6 peace officer captain Julia M. Valdes cited *Williams v. Superior Court*, 5 Cal.4th 337 (1993) as
7 her department's good cause for refusing to disclose and turn over phony and bogus GoPro
8 video recordings GL010586 and GL010587. But *Williams v. Superior Court* only further proves
9 that County of Los Angeles Sheriff's Department and its sheriff Robert Luna had a legal duty
10 and legal obligation to turn over and disclose copies of phony and bogus LASD-created GoPro
11 video recordings GL010586 and GL010597. In *Williams* the Supreme Court stated:

12
13 *Congress wished to require courts "to loo[k] to the reasons' for allowing [the] withholding of*
14 *investigatory files before making their decisions." (Ibid.) The six new criteria achieved this*
15 *goal by providing that no record was exempt unless its disclosure would "interfere with*
16 *enforcement proceedings" (5 U.S.C. § 552 (b) (7) (A)) or trigger one of the other criteria (id.,*
17 *§ 552 (b))7) (B) (F)).*

18 *Id.* at 360

19
20 *In short, the FOIA's exemption for law enforcement investigatory records often does*
21 *terminate when the investigation terminates.*

22 *Id.* at 360

23
24 *Public policy does not demand that stale records be kept secret when their disclosure can*
25 *harm no one, and the public god would seem to require a procedure by which a court may*
26 *declare that the exemption has expired.*

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 246. In frivolous Superior Court of California, County of Los Angeles, Alhambra Superior
2 Court felony criminal case GA114055 FAKE victim Jennifer Hutton-Heger has been deceased
3 since June 10, 2024. Releasing a copy of phony and bogus LASD-created GoPro video
4 recordings GL010586 and GL010587 would not have endangered the safety of Jennifer Hutton-
5 Heger because she is deceased. County of Los Angeles Sheriff's Department and its sheriff
6 Robert Luna's disclosure of phony and bogus GoPro video recordings GL010586 and
7 GL010587 would not have endangered the successful completion of Billy S. Khounthavong and
8 Defendant Leo Ka Fong Lo's SHODDY & SHADY criminal investigation because on October
9 17, 2023, KING AROGANT was convicted, and those phony LASD-created GoPro video
10 recordings were played, presented and admitted in Superior Court of California, County of Los
11 Angeles, Alhambra Superior Court, Department 1 on April 4, 2023, April 5, 2023, and February
12 2, 2024. The reckless failure of Sheriff Robert Luna to refuse to disclose and turn over to KING
13 AROGANT phony and bogus LASD-created GoPro video recordings GL010586 and GL010587
14 had nothing to do with California state law exemptions pursuant to California Government Code
15 § 6254, subdivision (f) because the playing, presenting, and admittance of phony LASD-created
16 GoPro video recordings GL010586 and GL010587 in a criminal Superior Court of California
17 criminal courthouse on April 4, 2023, April 5, 2023, and February 2, 2024 proved by clear and
18 convincing evidence that these video recordings have nothing to do with the analysis or
19 conclusions of the Southern California High Tech Task Force peace officers' illegal searching,
20 illegal copying, illegal manipulating, and illegal altering of KING AROGANT's GoPro video
21 recordings, as was proven earlier in this civil rights complaint based on the original GoPro video
22 recordings returned to KING AROGANT that were all recorded on February 21, 2023 having
23 metadata showing that the last access date was February 15, 2023, and the criminal investigation
24 was proven to be over at preliminary hearing when Lying Billy Khounthavong infamously
25 falsely testified to the following:

26
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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 JUDICIAL ABUSE OF PROCESS, 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**

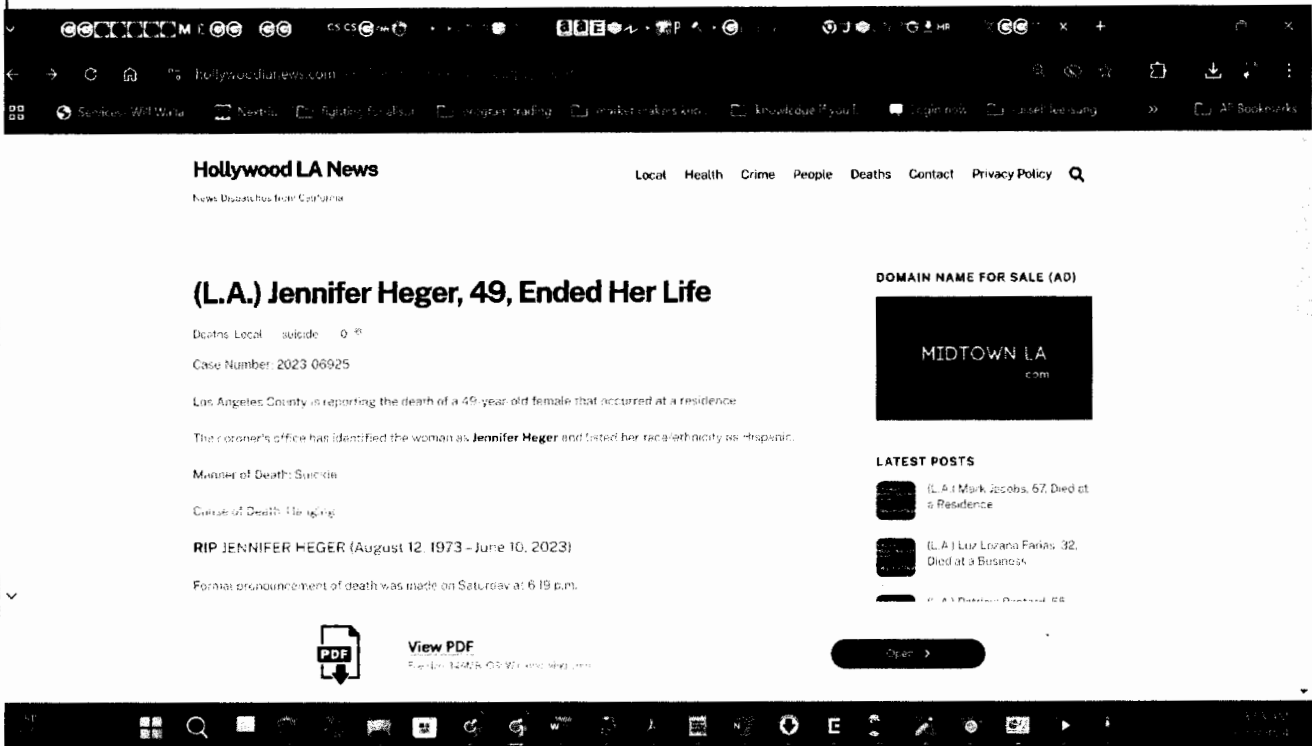
1 MARK Rosenberg: And the videos that you retrieved, how did you get those?

2
3 Billy Khounthavong: I submitted the GOPRO to our high-tech bureau and
4 detectives from that bureau downloaded the data from the
5 GoPro itself, and I retrieved data from them.
6

7
8 The only reason County of Los Angeles Sheriff's Department, Robert Luna, and Captain Julia
9 Valdes willfully, recklessly, maliciously, knowingly, wantonly, and callously refused to turn
10 over and disclose copies of phony GoPro video recordings GL010586 and GL010587 was so
11 that they could conceal the video recordings for the unlawful purpose of shielding the County of
12 Los Angeles from civil liability, and protect Billy S. Khounthavong, Richard Lewis, Leo Ka
13 Fong Lo, and all other involved peace officers from going to federal prison for them all
14 willfully, knowingly, recklessly, wantonly, maliciously, carelessly, and callously violating 18
15 U.S.C. §§ 241 and 242. There is clear and convincing evidence already that the metadata of
16 KING AROGANT's video recordings proves he did not record phony GoPro video recordings
17 GL010586 and GL010587 even though Lying testified on April 5, 2023, that both of these
18 phony video recordings were retrieved from KING AROGANT's GoPro camera. Further, KING
19 AROGANT is not even wearing the same clothing in phony LASD-created GoPro video
20 recordings that he had on as shown by County of Los Angeles Sheriff's Department bodycam
21 video recordings, Jennifer Hutton-Heger's first 911 call, and KING AROGANT's original but
22 altered GoPro video recordings found on his GoPro camera after he was released on October 17,
23 2023. County of Los Angeles and sheriff Robert Luna's disclosure of phony LASD-created
24 GoPro video recordings GL01586 and GL010587 would prove by clear and convincing
25 evidence that multiple bureaus and divisions within the County of Los Angeles Sheriff's
26 Department did a lot of hard work over several days so that they could all be successful at
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 JUDICIAL ABUSE OF PROCESS, 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 FRAMING KING AROGANT for a serious and violent felony crime, they all knew he never
2 committed, which would substantially increase the civil liability for the County of Los Angeles
3 and greatly increase the possibility and probability that KING AROGANT would awarded
4 punitive damages if any of his many to be filed civil rights complaints across Northern, Central,
5 and Eastern United States district courts went to trial. See now a true and correct copy
6 Hollywood LA News article reporting the untimely demise of Jennifer Hutton-Heger on June
7 10, 2023, attached as Exhibit _____ of KING AROGANT's Verified Appendix of Exhibits,
8 and also below.



25 See now a true and correct copy County of Los Angeles Sheriff's Department, peace officer
26 captain Julie M. Valdes, and Sheriff Robert Luna's recklessly frivolous rejection letter attached

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 JUDICIAL ABUSE OF PROCESS, 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 as Exhibit _____ of KING AROGANT's Verified Appendix of Exhibits, and also below.
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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 JUDICIAL ABUSE OF PROCESS, 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**



OFFICE OF THE SHERIFF

COUNTY OF LOS ANGELES

HALE OF JUSTICE

ROBERT G. LUNA, SHERIFF



June 27, 2024

Arogant Hollywood
aroganhollywoodgenious@gmail.com

Dear Mr. Hollywood:

PUBLIC RECORDS ACT REQUEST #24-1498DI

This letter is in response to your request for records under the California Public Records Act (CPRA) dated and received by the Los Angeles County Sheriff's Department (LASD), Public Records Act Unit on June 10, 2024.

In your request, you are seeking the following:

...Requesting GO PRO videos related to arrest on 2/21/23, booking #8555970. On 02/23/23, the videos were turned over to the LASD Fraud and Cyber Crimes Bureau Southern California High Tech Task Force. Videos should be in possession with LASD Det. Leo K. Lo. Requesting all 16 videos related to the incident, specifically GLO10586 which shows him turning off the Go Pro , and GLO10587 where it shows his reflection in the mirror.

On June 11, 2024, we extended our time to respond to request under Government Code section 7922.535 subdivision (b), by an additional fourteen (14) days due to the existence of unusual circumstances. The unusual circumstances include the need to search for, collect, and appropriately review potentially responsive records. We indicated we would provide you with an update by July 5, 2024.

Response: The records sought constitute investigatory files, which are exempt from disclosure, based on, but not limited to the following authorities: the California Constitution, article I, section 1; and Government Code sections 7923.600-7923.625 and 7922.000. *Williams v. Superior Court*, 5 Cal.4th 337, 361-362 (1993) (once a record is created for investigatory purposes, it remains exempt and does not terminate with the conclusion of the investigation).

211 WEST TEMPLE STREET, LOS ANGELES, CALIFORNIA 90012

A Tradition of Service
— Since 1850 —

Arogant Hollywood
PRA #24-1498DI

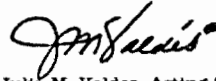
-2-

June 27, 2024

If you have any questions, please contact the Public Records Act Unit via email at DiscoveryUnitPRArequests@lasd.org or phone at (323) 890-5050.

Sincerely,

ROBERT G. LUNA, SHERIFF



Julia M. Valdes, Acting Captain
Risk Management Bureau

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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED

1 247. On July 7, 2023, KING AROGANT was in Superior Court of California, County
2 of Los Angeles, Alhambra Superior Court, Department 1, with the biased, racist, and
3 prejudiced Michael Villalobos presiding. At this Superior Court hearing, KING
4 AROGANT filed a California Penal Code § 1054.1 motion requesting that Defendant
5 George Gascón and his rogue County of Los Angeles criminal prosecutors Brian MARK
6 Rosenberg and Victor Manuel Rodriguez turn over and disclose a copy of phony LASD-
7 created GoPro video recordings GL010586 and GL010587 that depicted and displayed
8 KING AROGANT shutting off his GoPro camera. In collusion, Superior Court of
9 California judicial officer Michael Villalobos failed to hold a hearing on KING
10 AROGANT's motion, nor did he order Brian MARK Rosenberg to turn over phony
11 LASD-created GoPro video recordings GL010586 and GL010587 that depicted and
12 displayed KING AROGANT shutting off his GoPro camera with his bare right arm
13 inside of FAKE VICTIM Jennifer Hutton-Heger's home while he was wearing a tank top
14 and dark shorts.

15
16 248. On or about September 6, 2023, KING AROGANT requested that Michael
17 Villalobos sign a drafted ORDER created by KING AROGANT that would ORDER
18 Defendant George Gascón and his rogue County of Los Angeles criminal prosecutors
19 Brian MARK Rosenberg and Victor Manuel Rodriguez to immediately provide KING
20 AROGANT with a copy of all sixteen GoPro video recordings that were willfully,
21 knowingly, carelessly, recklessly, wantonly, maliciously, and callously played, presented,
22 testified to, and displayed at the preliminary hearing on April 4, 2023, and April 5, 2023,
23 specifically the phony GoPro video recordings GLO10586 and GL010587 showing
24 KING AROGANT meeting the UBER XL driver outside of Hutton's home (GL010587)
25 and shutting off his GoPro camera (GL010586). Prejudice Michael Villalobos outright
26 refused to sign KING AROGANT's nearly fourteen-page ORDER that would compel

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 JUDICIAL ABUSE OF PROCESS, 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 Defendant George Gascón and his rogue criminal prosecutors Brian MARK Rosenberg
2 and Victor Manuel Rodriguez to turn over all sixteen GoPro video recordings that were
3 testified to, shown to the Superior Court and admitted into evidence at the rigged
4 preliminary hearing on April 4, 2023, and April 5, 2023, specifically phony LASD-
5 created GoPro video recordings GL010586 and GL010587 which depicted and displayed
6 AROGANT shutting off his GoPro camera (GL010586) and also showed fake video
7 frame sequences of exactly when he got up out of his seat to stand at the door outside and
8 meet the UBER XL driver (GL010587). Instead of granting the COURT ORDER, that
9 would have compelled George Gascón and his rogue and dishonest criminal prosecutors
10 Brian MARK Rosenberg and Victor Manuel Rodriguez to turn over phony GoPro video
11 recordings depicting and displaying AROGANT shutting off his GoPro camera
12 (GL010586). Sneakingly without KING AROGANT present in Superior Court.
13 Prejudiced and biased Michael Villalobos, working in collusion with George Gascón and
14 Brian MARK Rosenberg, made a court order for Gascon and MARK Rosenberg to turn
15 over a copy of original GoPro video recordings on a USB flash drive to KING
16 AROGANT's private investigator Joel Simeone Wyenn. Yet, Michael Villalobos's court
17 order intentionally did not order George Gascón and his rogue criminal prosecutors Brian
18 MARK Rosenberg and Victor Manuel Rodriguez to turn over phony LASD-created
19 GoPro video recordings GL010586 and GL010587 because Villalobos knew that those
20 video recordings proved that the state government and County of Los Angeles recklessly,
21 wantonly, maliciously, callously, and willfully falsified video recording evidence in
22 frivolous criminal case GA114055. Michael Villalobos, Brian MARK Rosenberg, Victor
23 Manuel Rodriguez, Sharon Lee Woo, James William Garrison, Stephanie Pearl Mire, and
24 many others' actions and misconduct of not turning over all requested GoPro video
25 recordings recklessly violated KING AROGANT's Fourteenth Amendment Due Process
26 Clause constitutional rights and KING AROGANT's Article I, Section 7 California

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 JUDICIAL ABUSE OF PROCESS, 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 rights. Michael Villalobos's reckless failure to order George Gascón and
2 Brian MARK Rosenberg to turn over exceedingly impeaching video recording evidence
3 before September 6, 2023, and also after September 6, 2023, is the sole reason why Brian
4 MARK Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James William
5 Garrison, Stephanie Pearl Mire, and many others' were able to recklessly, maliciously,
6 wantonly, callously, and willfully present to a criminal State of California Superior Court
7 phony LASD-created GoPro video recordings GL010586 and GL010587 that falsely
8 depicted KING AROGANT shutting off his GoPro camera, meeting with an UBER
9 driver, and walking to the front door of Hutton's home and looking outside, false and
10 manipulated video recording evidence that was used for the sole purpose of incarcerating
11 KING AROGANT beyond February 2, 2024, without legal justification and probable
12 cause, to the Superior Court on February 2, 2024.

13
14 249. On or about October 5, 2023, KING AROGANT filed a nearly thirty-page verified
15 motion to compel requesting that the Superior Court order Defendant George Gascón and
16 his co-conspirators Brian MARK Rosenberg, Victor Manuel Rodriguez, Sharon Lee
17 Woo, James William Garrison, and Stephanie Pearl Mire to turn over and disclose a copy
18 of phony GoPro video recordings that depicted KING AROGANT getting up out of his
19 seat to meet UBER XL driver and that showed KING AROGANT shutting off his GoPro
20 camera while being inside of Jennifer Hutton Heger's home. The Superior Court, Michael
21 Villalobos, Brian MARK Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James
22 William Garrison, and Stephanie Pearl Mire recklessly, willfully, wantonly, maliciously,
23 and callously violated KING AROGANT's United States Fourteenth Amendment
24 constitutional rights and California constitutional rights by opposing KING AROGANT's
25 motion to compel, and allowing in collusion judicial officer Michael Villalobos to
26 recklessly deny KING AROGANT's motion to compel just before the commencement 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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 KING AROGANT's criminal bench trial without holding a hearing at all and by refusing
2 to ORDER Defendant George Gascón and his County of Los Angeles criminal
3 prosecutors to turn over and disclose a copy of phony GoPro video recordings showing
4 KING AROGANT meeting UBER XL driver (GL010587) and that depicted and
5 displayed KING AROGANT shutting off his GoPro camera (GL010586).

6
7 250. In early October 2023, KING AROGANT filed a motion directly with Superior
8 Court of California, County of Los Angeles, Pasadena Superior Court prejudiced judicial
9 officer Suzette Clover requesting that she provide him with a certified copy of Billy
10 Khounthavong's phony and FORGED search warrant pursuant to California Evidence
11 Code section 1530. Prejudiced, biased and RACIST State of California judicial officer
12 Suzette Clover recklessly, wantonly, willfully, maliciously, and callously violated KING
13 AROGANT's United States Fourteenth Amendment constitutional rights and California
14 Constitution Article I, § 7 constitutional rights by denying AROGANT's motion by
15 recklessly failing to provide KING AROGANT with a certified copy of rogue County of
16 Los Angeles peace officer's Billy Khounthavong's alleged electronically filed February
17 22, 2023 search warrant, and RACIST AND BIASED judicial officer Suzette Clover
18 LIED that she issued Billy Khounthavong's phony search warrant, and she lied that it
19 was done electronically.

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

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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 **Electronically FILED by**
2 **Superior Court of California,**
3 **County of Los Angeles**
4 **02/22/2023 _____ PM**
5 **David W. Slayton,**
6 **Executive Officer/Clerk of Court**
7 **CLERK NAME HERE, Deputy Clerk**

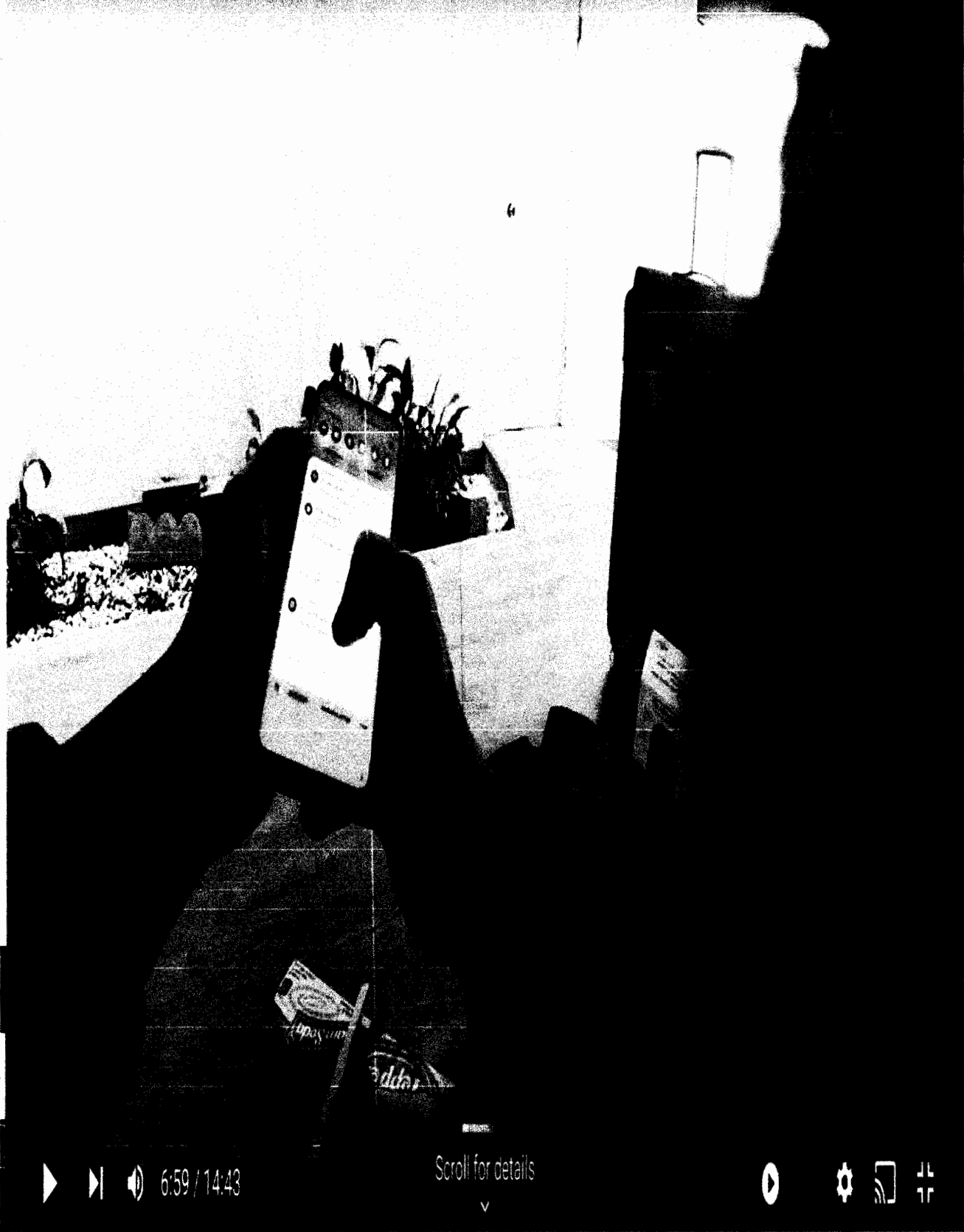
8 Additionally, pursuant to the Trial Court Records Manual Revised 2020, Judicial
9 Council of California, on page 115 of 143, page 132 of 143, and 21 of 143, rogue County
10 of Los Angeles peace officer Billy Khounthavong and Suzette Clover's search warrant
11 was clearly proven to be counterfeit and was never issued since the Pasadena Superior
12 Court has no record of it existing while State of California Pasadena Superior Court was
13 required pursuant to **California Government Code Section 68152** to retain a copy of it
14 at the Pasadena Superior Court until 2033. Further, on page 132 of 143 in the Trial Court
15 Records Manual Revised 2020, the Judicial Council of California states that pursuant to
16 California Penal Code Section 1534, the Pasadena Superior Court was required to make
17 Billy Khounthavong and Suzette Clover's counterfeit and make-believe search warrant
18 open to the public. Pasadena Superior Court has no electronic or physical paper copy
19 records of rouge Billy Khounthavong and RACIST Suzette Clover's PHONY search
20 warrant because it was never filed in the Pasadena Superior Court and it does not exist.
21 The Pasadena Superior Court also has no court records for February 22, 2023, of Suzette
22 Clover issuing a minute order stating and documenting what action she took on Billy
23 Khounthavon's search warrant. And lastly, Pasadena Superior Court has no records of
24 Billy Khounthavong ever filing the mandatory Countywide Warrant System Initial Case
25 Filing Form, form CRIM 126.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 252. On February 2, 2024, George Gascón, Brian MARK Rosenberg, Victor Manuel
2 Rodriguez, Sharon Lee Woo, James William Garrison, and Stephanie Pearl Mire
3 recklessly played, admitted, and presented a phony LASD-created GoPro video recording
4 that depicted and portrayed KING AROGANT shutting off his GoPro camera using a
5 bare and naked right arm (GL010586). In the County of Los Angeles Sheriff's
6 Department's body camera video recordings, KING AROGANT was seen wearing a
7 long-sleeved jacket. During Jennifer Hutton-Heger's first 911 call, she described KING
8 AROGANT's clothing as baggy pants and a long-sleeved shirt. Thus, George Gascón,
9 Brian MARK Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James William
10 Garrison, and Stephanie Pearl Mire's phony GoPro video recording GL010586 which
11 depicts and displays KING AROGANT wearing a tank-top and also different pants,
12 proves by clear and convincing evidence that George Gascón, Brian MARK Rosenberg,
13 Victor Manuel Rodriguez, Sharon Lee Woo, James William Garrison, and Stephanie
14 Pearl Mire's GoPro video recordings GL010586 and GL010587 are phonies and
15 counterfeits and were NOT created by KING AROGANT on February 21, 2023. In
16 KING AROGANT's original but manipulated by County video recording, there is sound.
17 In George Gascón, Brian MARK Rosenberg, Victor Manuel Rodriguez, Sharon Lee
18 Woo, James William Garrison, and Stephanie Pearl Mire's Artificial Intelligence-
19 powered video recording, there is no sound. See now a true and correct of a video
20 recording frame sequence created from KING AROGANT's REAL GoPro video
21 recording proving that he was wearing a long-sleeved coat on February 21, 2023, Exhibit
22 _____ of KING AROGANT's Verified Appendix of Exhibits, and below.

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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 JUDICIAL ABUSE OF PROCESS, 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 REAL VIDEO FOR 2 21 2023 1



1 253. Images taken from KING AROGANT's real video recorded on February 21, 2023,
2 show him wearing a long-sleeved coat, not a tank top, as was shown in George Gascón,
3 Brian MARK Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James William
4 Garrison, and Stephanie Pearl Mire's phony and bogus LASD-created video recording
5 GL010586, which were manipulated by Defendant George Gascón and his co-
6 conspirators to frame KING AROGANT for a serious and violent felony that all emailed
7 County of Los Angeles peace officers and attorneys knew KING AROGANT never
8 committed.

9
10 254. On February 2, 2024, Superior Court of California, County of Los Angeles,
11 Alhambra Superior Court, Department 1 held an evidentiary hearing on KING
12 AROGANT's motion to withdraw his nolo contendere felony plea that he entered in
13 Department 1 on October 17, 2023. KING AROGANT had previously filed a motion to
14 withdraw his no-contest plea, and concurrently, he filed a request for an evidentiary
15 hearing so that his REAL GoPro video recordings could be presented and admitted at
16 the court hearing by KING AROGANT.

17
18 255. On February 2, 2024, County of Los Angeles Deputy District Attorney MARK
19 Rosenberg both testified and presented the manipulated, altered, bogus, and phony GoPro
20 video recording GL010586 created by the Los Angeles County Sheriff's Department.
21 The bogus video displayed and depicted KING AROGANT shutting off his GoPro
22 camera. The bogus and phony LASD-created GoPro video recording GL010586 featured
23 an artificial intelligence-powered KING AROGANT repeatedly touching his GoPro
24 camera multiple times before finally stopping the recording with his bare and naked right
25 arm.

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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

1 The evidence clearly shows that the LASD-created GoPro video GL010586 is a
2 phony for the following reasons:

- 3
4 1. In George Gascón's phony LASD-created GL010586, KING AROGANT
5 is seen shutting off his GoPro camera while his entire right arm can be
6 seen to be bare and naked, without clothing on his arms. In George
7 Gascón's phony and bogus LASD-created GL010586, KING AROGANT
8 is clearly seen wearing a dark-colored tank top and shorts.
- 9
10 2. In the original GoPro GL010586 video recording, KING AROGANT is
11 never seen shutting off his GoPro camera. In the original GoPro
12 GL010586 video recording, KING AROGANT is seen to be wearing a
13 long-sleeved shirt and baggy pants. In fact, not even KING AROGANT's
14 hairstyle is the same. In phony and bogus LASD-created GoPro video
15 recording GL010586 KING AROGANT has his hair free flowing with no
16 hair ties keeping his hair in a ponytail. In George Gascón's phony and
17 bogus LASD-created GoPro video recording GL010586 KING
18 AROGANT is depicted and portrayed in the video recording with his hair
19 in a ponytail.

20 256. On February 2, 2024, rogue, racist, biased, and prejudiced County of Los Angeles
21 criminal prosecutors Brian MARK Rosenberg, Victor Manuel Rodriguez, and George
22 Gascón willfully, knowingly, recklessly, maliciously, wantonly, and callously presented,
23 played and admitted false oral testimony while showing altered LASD-created GoPro
24 video recording and asking KING AROGANT:

25 MARK ROSENBERG: *How did you get over to that door on the other side?*

26
27 ***GREAT QUESTION MARK! THE ANSWER IS YOU SHOULD BE IN JAIL!***

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 JUDICIAL ABUSE OF PROCESS, 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**

1 257. Because the phony GoPro video recording GL010586 that George Gascón and
2 MARK Rosenberg showed the Superior Court of California, County of Los Angeles,
3 Alhambra Superior Court on February 2, 2024, showed KING AROGANT walking near
4 the front door of Jennifer Hutton-Heger. What it did not show was KING AROGANT
5 standing in Hutton's mirror wearing a long-sleeved coat and his GoPro camera.
6 PROVING THAT GEORGE GASCÓN, VICTOR MANUEL RODRIGUEZ, AND
7 BRIAN MARK ROSENBERG'S DOCTORED AND SPLICED GOPRO VIDEO
8 RECORDINGS presented falsely to the Superior Court of California, County of Los
9 Angeles, Alhambra Superior Court on April 4, 2023, April 5, 2023, and February 2, 2024
10 ARE PHONIES! In George Gascón, Brian MARK Rosenberg, Victor Manuel Rodriguez,
11 Sharon Lee Woo, James William Garrison, and Stephanie Pearl Mire's LASD created
12 phony GoPro video recording GL010586 KING AROGANT is seen walking around a
13 dark house wearing a tank top. In KING AROGANT's REAL GoPro video recording
14 GL010587 KING AROGANT is seen standing in Hutton's mirror wearing only his
15 GoPro camera and a long-sleeved shirt, and the background of the original video
16 recording GL010586 shows plenty of natural like coming into Jennifer Hutton-Heger's
17 home, unlike George Gascón, Brian MARK Rosenberg, and Victor Manuel Rodriguez's
18 phony GoPro video recordings GL010586 and GL010587. At 8 minutes and 33 seconds
19 into KING AROGANT's combined original GoPro video recording, he is only seen
20 wearing non-ponytailed dreadlocks that are free flowing and hanging over his shoulders,
21 a GoPro camera strapped to his chest area, and a dark tan colored long-sleeved coat. See
22 now a true and correct image 1 taken from KING AROGANT's combined original
23 GoPro video recordings at 8 minutes and 33 seconds of 14 minutes and 43 seconds video
24 recording attached as Exhibit _____ of KING AROGANT's Verified Appendix of
25 Exhibits, and below.

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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 JUDICIAL ABUSE OF PROCESS, 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, HED, & NEGLIGENT HED**

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2 MARK Rosenberg showed the Superior Court of California, County of Los Angeles,
3 Alhambra Superior Court on February 2, 2024, showed KING AROGANT walking near
4 the front door of Jennifer Hutton-Heger. What it did not show was KING AROGANT
5 standing in Hutton's mirror wearing a long-sleeved coat and his GoPro camera.
6 PROVING THAT GEORGE GASCÓN, VICTOR MANUEL RODRIGUEZ, AND
7 BRIAN MARK ROSENBERG'S DOCTORED AND SPLICED GOPRO VIDEO
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13 dark house wearing a tank top. In KING AROGANT's REAL GoPro video recording
14 GL010587 KING AROGANT is seen standing in Hutton's mirror wearing only his
15 GoPro camera and a long-sleeved shirt, and the background of the original video
16 recording GL010586 shows plenty of natural like coming into Jennifer Hutton-Heger's
17 home, unlike George Gascón, Brian MARK Rosenberg, and Victor Manuel Rodriguez's
18 phony GoPro video recordings GL010586 and GL010587. At 8 minutes and 33 seconds
19 into KING AROGANT's combined original GoPro video recording, he is only seen
20 wearing non-ponytailed dreadlocks that are free flowing and hanging over his shoulders,
21 a GoPro camera strapped to his chest area, and a dark tan colored long-sleeved coat. See
22 now a true and correct image 1 taken from KING AROGANT's combined original
23 GoPro video recordings at 8 minutes and 33 seconds of 14 minutes and 43 seconds video
24 recording attached as Exhibit _____ of KING AROGANT's Verified Appendix of
25 Exhibits, and below.

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**



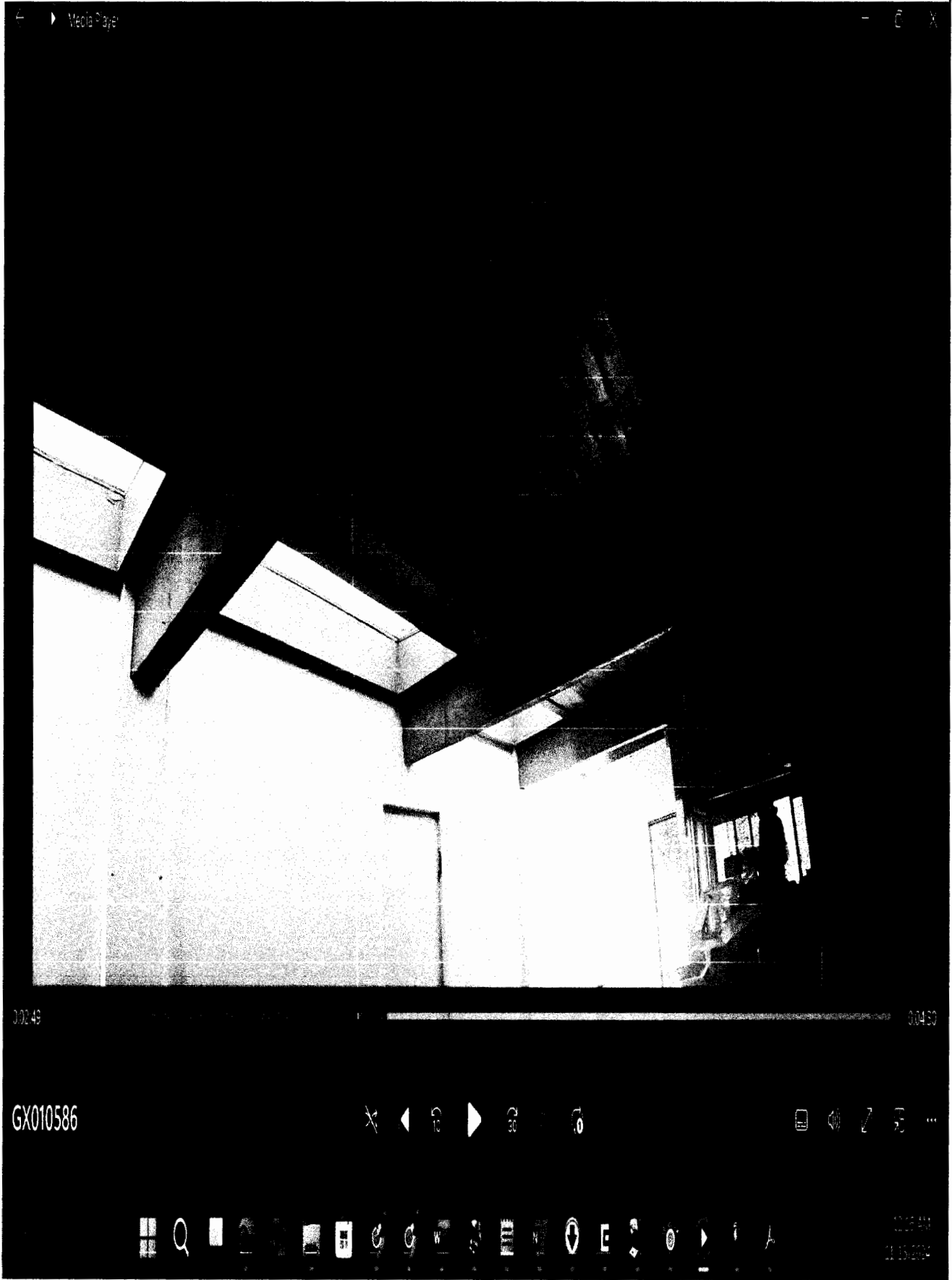
14 258. At KING AROGANT's evidentiary hearing Brian MARK Rosenberg, George Gascón,
15 and Victor Manuel Rodriguez willfully, knowingly, recklessly, maliciously, wantonly,
16 carelessly, and callously offered and presented to the Superior Court of California, County of
17 Los Angeles, Alhambra Superior Court, Department 1 oral false testimony by Brian MARK
18 Rosenberg with Victor Manuel Rodriguez serving as the criminal prosecutor asking MARK
19 Rosenberg questions on direct examination. MARK Rosenberg testified that KING
20 AROGANT's combined GoPro video recordings were spliced and manipulated. MARK
21 Rosenberg also testified the following: *"It shows him shutting it off."* George Gascón, Brian
22 MARK Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James William
23 Garrison, and Stephanie Pearl Mire are all full of so much CRAP they will need a whole
24 roll of toilet paper. Just like the combined GoPro video recordings images that were
25 electronically served upon numerous Defendants sued herein showed KING AROGANT
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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 JUDICIAL ABUSE OF PROCESS, 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 inside Hutton Heger's home wearing free-flowing dreadlocks hanging to his shoulder, a GoPro
2 camera strapped to his chest, and a long-sleeved coat. In KING AROGANT's original GoPro
3 video recording GL010586 (meticulously split up from GX010586 into GX010586, GX010587,
4 GL010588, GL10589, & GL10590) it depicts and displays him wearing a long-sleeved coat, free
5 flowing dreadlocks hanging to his shoulders, GoPro camera strapped to his chest, and a dark tan
6 colored long-sleeved coat. See now a true and correct image 1 taken from KING
7 AROGANT's original GoPro video recordings at 2 minutes and 49 seconds of 7 minutes
8 and 19 seconds video recording attached as Exhibit _____ of KING AROGANT's
9 Verified Appendix of Exhibits, and below.

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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 JUDICIAL ABUSE OF PROCESS, 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**

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1 259. At ten minutes into KING AROGANT's combined real GoPro video recording
2 KING AROGANT can again be seen standing in front of Hutton's mirror. The GoPro
3 video recording again shows KING AROGANT wearing a long-sleeved coat and his
4 GoPro camera, proving that his video recording was one continuous video broken up and
5 manipulated by County of Los Angeles peace officers. KING AROGANT is seen again
6 standing in front of Hutton's mirror at 10:18 seconds into the video recording.

7 See now a true and correct image 1 taken from KING AROGANT's original combined
8 GoPro video recordings (meticulously split up from GX010586 into GX010586, GX010587,
9 GL010588, GL10589, & GL10590) at 10 minutes and 18 seconds of 14 minutes and 43
10 seconds video recording attached as Exhibit _____ of KING AROGANT's Verified
11 Appendix of Exhibits, and below.

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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 JUDICIAL ABUSE OF PROCESS, 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**

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AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, & NEGLIGENT IIED

1 260. But there is even more concrete evidence that George Gascón, Brian MARK
2 Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James William Garrison,
3 Stephanie Pearl Mire, and DOES 1-10's phony and bogus LASD-created GoPro video
4 recordings GL010586 and GL010587 were never filmed and created by KING
5 AROGANT on February 21, 2023. At the preliminary hearing on April 4, 2023, and
6 April 5, 2023, George Gascón, Brian MARK Rosenberg, and Victor Manuel Rodriguez
7 all willfully, knowingly, recklessly, maliciously, wantonly, carelessly, and callously presented
8 and admitted false testimony to the Superior Court of California, County of Los Angeles,
9 Alhambra Superior Court, Department 1 on April 4, 2023 and April 5, 2023 that GoPro video
10 recording GL010586 was 7 minutes and 19 seconds. Even while KING AROGANT was on the
11 stand Brian MARK Rosenberg again confirmed that the People's GoPro video recording
12 GL10586 was 7 minutes and 19 seconds. The original split-up GX010586 GoPro video
13 recording found on KING AROGANT's GoPro camera also ends at 7 minutes and 19 seconds.
14 This particular GoPro video recording found on KING AROGANT's GoPro camera does not
15 show him shutting it off, it is not dark inside Jennifer Hutton's home, and KING AROGANT is
16 not seen shutting off his GoPro camera with a bare and naked right arm. GX010586 exonerates
17 KING AROGANT because while the same length as George Gascón, Brian MARK
18 Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James William Garrison,
19 Stephanie Pearl Mire, and DOES 1-10's phony and bogus LASD-created GoPro video
20 recording GL010586 none of the false video recording sequences recklessly shown by
21 George Gascón, Brian MARK Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo,
22 James William Garrison, Stephanie Pearl Mire, and DOES 1-10 on April 4, 2023, April
23 5, 2023, and February 2, 2024, show KING AROGANT doing any of the following:

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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

- 1 1. Wearing a tank top and dark shorts.
- 2 2. Having hair in a ponytail.
- 3 3. Walking around a dark home
- 4 4. Touching his GoPro camera multiple times
- 5 5. Walking out of Jennifer Hutton Heger's home as he is shutting off his GoPro
- 6 camera.\
- 7 6. KING AROGANT shutting off his GoPro camera between 7 minutes and
- 8 7 minutes and 19 seconds of GoPro video recording GX010586

9

10 See now a true and correct image 1 taken from KING AROGANT's original GoPro video

11 recording GX010586 (meticulously split up from GX010586 into GX010586, GX010587,

12 GL010588, GL10589, & GL10590) at 7 minutes and 19 seconds of 7 minutes and 19

13 seconds video recording attached as Exhibit _____ of KING AROGANT's Verified

14 Appendix of Exhibits, and below.

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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 JUDICIAL ABUSE OF PROCESS, 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**



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 JUDICIAL ABUSE OF PROCESS, 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

261. The real GoPro video recording GX010587 (meticulously split up from GX010586 into GX010586, GX010587, GL010588, GL10589, & GL10590) also shows at 1 minute and 13 seconds into the 1 minute and 41 seconds also shows KING AROGANT wearing a GoPro camera strap, long dreadlocks hanging from his shoulder, and a long-sleeved coat! George Gascón, Brian MARK Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James William Garrison, Stephanie Pearl Mire, and DOES 1-10's phony and bogus LASD-created GL010587 meticulously cuts out any video frame sequences of KING AROGANT standing in Jennifer Hutton-Heger's mirror on February 21, 2023. George Gascón, Brian MARK Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James William Garrison, Stephanie Pearl Mire, and DOES 1-10 willfully, knowingly, maliciously, carelessly, wantonly, recklessly, and callously cut the video frame sequence of KING AROGANT standing in Hutton's mirror out of phony and bogus LASD-created GoPro video recording GL010587 so that they could conceal from and hide from KING AROGANT and Superior Court of California, County of Los Angeles, Alhambra Superior Court the truth that on February 21, 2023 KING AROGANT was not wearing the tank top and dark shorts, and on February 21, 2023 KING AROGANT was not inside Jennifer Hutton-Heger's home shutting off his GoPro camera with a bare and naked right arm. See now a true and correct image 1 taken from KING AROGANT's original GoPro video recording GL010587 at 1 minute and 13 seconds of 1 minute and 41 seconds video recording attached as Exhibit _____ of KING AROGANT's Verified Appendix of Exhibits, and below.

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 JUDICIAL ABUSE OF PROCESS, 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



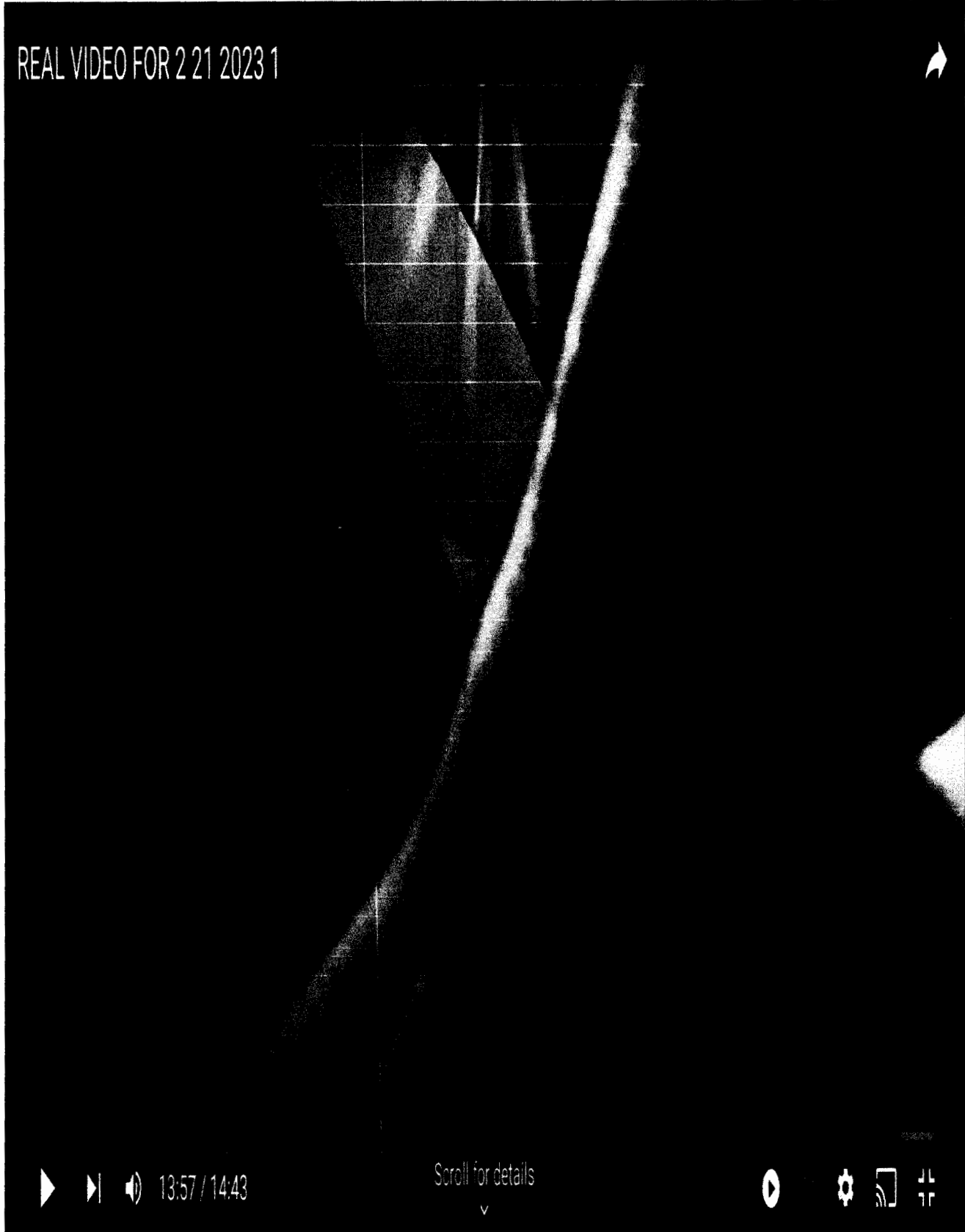
Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, Violation 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

1 262. On February 2, 2024, KING AROGANT showed the Superior Court of California,
2 County of Los Angeles, Alhambra Superior Court, Department 1 his original 14 minute
3 and 43 seconds combined GoPro video recording (meticulously split up from GX010586
4 into GX010586, GX010587, GL010588, GL10589, & GL10590) that showed and portrayed a
5 reflection of KING AROGANT again wearing a long-sleeved coat. It would have been
6 impossible for KING AROGANT to have been wearing a long-sleeved coat and tank top
7 on the same date and time shown in George Gascón, Brian MARK Rosenberg, Victor
8 Manuel Rodriguez, Sharon Lee Woo, James William Garrison, Stephanie Pearl Mire, and
9 DOES 1-10's phony and bogus LASD-created GL1010586 and GL010587 on February 21,
10 2023, because the reflection of KING AROGANT in both the manipulated GoPro video
11 recordings and the original GoPro video recordings show KING AROGANT at a County of Los
12 Angeles Sheriff's Department police vehicle wearing a long-sleeved coat, and having a GoPro
13 camera strapped to his chest, and KING AROGANT is seen on camera wearing this same long-
14 sleeved coat in County of Los Angeles Sheriff's Department police body camera video
15 recordings recorded on February 21, 2023. See now a true and correct image 1 taken from
16 KING AROGANT's original combined GoPro video recording (meticulously split up from
17 GX010586 into GX010586, GX010587, GL010588, GL10589, & GL10590) at 13 minutes and
18 57 seconds of 14 minutes and 43 seconds video recording attached as Exhibit _____ of
19 KING AROGANT's Verified Appendix of Exhibits, and below.

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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 JUDICIAL ABUSE OF PROCESS, 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**

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REAL VIDEO FOR 2 21 2023 1



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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, & NEGLIGENCE IIED

1 263. Paragraphs 227-262 of this original constitutional civil rights complaint prove by clear
2 and convincing evidence that Defendants George Gascón and DOES 1-10 willfully,
3 knowingly, carelessly, wantonly, maliciously, recklessly, and callously committed
4 reckless under color of law FRAUD, reckless under color of law Due Process Clause
5 constitutional violations, reckless under color of neglect to duty to aid and assist KING
6 AROGANT with overturning his wrongful conviction, and reckless under color of law
7 DECEIT by between February 21, 2023, and October 31, 2024, recklessly lying to,
8 concealing from, hiding from, failing to disclose, failing to tell, and otherwise deceiving
9 KING AROGANT and the Superior Court of California, County of Los Angeles,
10 Alhambra Superior Court to believe that the crime of felony criminal threats occurred on
11 February 21, 2023, by them all, and each of them, recklessly using numerous pieces and
12 articles of falsified, tainted, tampered with, illegally created, altered, edited, and
13 fabricated oral, audio recording, physical paper form, and video recording evidence so
14 that Defendants George Gascón and DOES 1-10 could gain an unfair, unjust, unlawful,
15 illegal, and wrongful advantage over KING AROGANT, and so that Defendants could
16 gain a wrongful and illegal felony conviction against KING AROGANT, which was all
17 done for the unlawful purpose of recklessly violating the United States Constitution and
18 recklessly violating KING AROGANT's Fourth and Fourteenth Amendment
19 constitutional civil rights.

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21 264. Paragraphs 227-262 of this original constitutional civil rights complaint prove by clear
22 and convincing evidence that Defendants Gavin Christopher Newsom, Leah Tamu Wilson,
23 Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-10
24 willfully, knowingly, carelessly, wantonly, maliciously, recklessly, and callously
25 committed reckless under color of law FRAUD, reckless reckless under color of law Due
26

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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 JUDICIAL ABUSE OF PROCESS, 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 Process Clause constitutional violations, reckless under color of neglect to duty to aid and
2 assist KING AROGANT with overturning his wrongful conviction, and reckless under
3 color of law DECEIT by between November 28, 2023, and October 31, 2024, recklessly
4 concealing from, hiding from, failing to disclose, failing to tell, and otherwise deceiving
5 KING AROGANT and the Superior Court of California, County of Los Angeles,
6 Alhambra Superior Court to continue to believe that the crime of felony criminal threats
7 occurred on February 21, 2023, by them all, and each of them, recklessly committing
8 under color of neglect to duty to aid and assist KING AROGANT with overturning his
9 wrongful conviction after they were all electronically served on numerous occasions clear
10 and convincing video recording evidence that no crime occurred on February 21, 2023,
11 and were all electronically served clear and convincing audio recording evidence that
12 KING AROGANT was wrongfully sentenced to California state prison on February 2,
13 2024, which was all done for the unlawful purpose of recklessly violating the United
14 States Constitution and recklessly violating KING AROGANT's Fourteenth Amendment
15 Due Process Clause constitutional civil rights.

16
17 265. Paragraphs 227-262 of this original constitutional civil rights complaint prove by clear
18 and convincing evidence that Defendants Jeffrey D. Macomber. Jason D. Johnson, Jennifer
19 Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, and
20 DOES 1-10 willfully, knowingly, carelessly, wantonly, maliciously, recklessly, and
21 callously committed reckless under color of law FRAUD, reckless under color of law
22 DECEIT, reckless under color of law Due Process Clause constitutional violations,
23 reckless under color of neglect to duty to aid and assist KING AROGANT with
24 overturning his wrongful conviction by them between June 8, 2024, and October 31,
25 2024, recklessly concealing from, hiding from, failing to disclose, failing to tell, and
26 otherwise deceiving KING AROGANT and the Superior Court of California, County 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 JUDICIAL ABUSE OF PROCESS, 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**

1 Los Angeles, Alhambra Superior Court to continue to believe that the crime of felony
2 criminal threats occurred on February 21, 2023, by them all, and each of them, recklessly
3 committing under color of neglect to duty to aid and assist KING AROGANT with
4 overturning his wrongful conviction after they were all electronically served on numerous
5 occasions clear and convincing video recording evidence that no crime occurred on
6 February 21, 2023, and were all electronically served clear and convincing audio
7 recording evidence that KING AROGANT was wrongfully sentenced to California state
8 prison on February 2, 2024, which was all done for the unlawful purpose of recklessly
9 violating the United States Constitution and recklessly violating KING AROGANT's
10 Fourteenth Amendment Due Process Clause constitutional civil rights.

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13 **F. DEFENDANTS GEORGE GASCÓN & DOES 1-10 CONTINUED TO**
14 **WILLFULLY, RECKLESSLY, KNOWINGLY, MALICIOUSLY, WANTONLY,**
15 **CARELESSLY AND CALLOUSLY CONTINUED TO VIOLATE KING**
16 **AROGANT's FOURTEENTH AMENDMENT DUE PROCESS CLAUSE**
17 **CONSTITUTIONAL RIGHTS PURSUANT TO *UNITED STATES V. BAGLEY***
18 **AND *BRADY V. MARYLAND* AFTER FEBRUARY 2, 2024**

19
20 266. Plaintiff KING AROGANT hereby restates, realleges, reiterates, reincorporates,
21 and incorporates by reference previous paragraphs 1-265 of this original civil rights
22 complaint.

23
24 267. On or about February 5, 2024, KING AROGANT left a voicemail requesting that
25 Alhambra Deputy in charge Victor Manuel Rodriguez (SBN # 156150) provide to co-
26 counsel Neil Opdahl-Lopez (SBN # 277596) a copy of George Gascón, Brian MARK

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 JUDICIAL ABUSE OF PROCESS, 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**

1 Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James William Garrison,
2 Stephanie Pearl Mire, and DOES 1-10's phony and bogus LASD-created GL1010586 and
3 GL010587 that were played, presented, and admitted at the evidentiary hearing on
4 February 2, 2024.

5
6 268. On or about February 6, 2024, KING AROGANT left a voicemail requesting that
7 Alhambra Deputy District Attorney Cindy Juhuyun Park (SBN # 271933) provide to co-
8 counsel Neil Opdahl-Lopez (SBN # 277596) a copy of George Gascón, Brian MARK
9 Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James William Garrison,
10 Stephanie Pearl Mire, and DOES 1-10's phony and bogus LASD-created GL1010586 and
11 GL010587 that were played, presented and admitted at the evidentiary hearing of
12 February 2, 2024.

13
14 269. On or about February 7, 2024, co-counsel Neil Opdahl-Lopez emailed rogue and
15 dishonest County of Los Angeles Deputy District Attorney Brian MARK Rosenberg
16 requesting that he provide him with a copy of George Gascón, Brian MARK Rosenberg,
17 Victor Manuel Rodriguez, Sharon Lee Woo, James William Garrison, Stephanie Pearl
18 Mire, and DOES 1-10's phony and bogus LASD-created GL1010586 and GL010587 that
19 were played, presented and admitted at the evidentiary hearing of February 2, 2024.
20 MARK Rosenberg replied back to Neil Opdahl-Lopez that he was no longer handling the
21 case. This is true, but it is also true that Brian MARK Rosenberg is the only Deputy
22 District Attorney in the County of Los Angeles who had and still has a copy of George
23 Gascón, Brian MARK Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James
24 William Garrison, Stephanie Pearl Mire, and DOES 1-10's phony and bogus LASD-created
25 GoPro video recordings GL1010586 and GL010587 that were played, presented and
26 admitted at the evidentiary hearing of February 2, 2024 that were being electronically

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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 JUDICIAL ABUSE OF PROCESS, 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 stored on his laptop computer.

2
3 270. On February 16, 2024, KING AROGANT contacted the Office of new Los
4 Angeles County District Attorney Office Family Violence Division Deputy in Charge
5 Janice Eve Johnson (SBN # 175280) by dialing 213-257-2185 using a 3-way conference
6 call made by his fiancée and lady of past twelve years Alison Helen Fairchild. KING
7 AROGANT left a message with Janis Eve Johnson's legal secretary Estra Malda and
8 requested that Janis Johnson contact co-counsel Neil Opdahl-Lopez at 626-429-6578
9 about providing him with a copy of George Gascón, Brian MARK Rosenberg, Victor
10 Manuel Rodriguez, Sharon Lee Woo, James William Garrison, Stephanie Pearl Mire, and
11 DOES 1-10's phony and bogus LASD-created GoPro video recordings GL1010586 and
12 GL010587 that were played, presented and admitted at the evidentiary hearing of
13 February 2, 2024

14
15 271. On or about February 16, 2024, KING AROGANT called County of Los Angeles
16 District Attorney's Office's Alhambra Deputy in Charge Victor Manuel Rodriguez by
17 dialing (626)308-5302 and requesting to be transferred to his voicemail. KING
18 AROGANT left a voicemail for Victor Manuel Rodriguez requesting that he provide co-
19 counsel Neil Opdahl-Lopez with a copy of George Gascón, Brian MARK Rosenberg,
20 Victor Manuel Rodriguez, Sharon Lee Woo, James William Garrison, Stephanie Pearl
21 Mire, and DOES 1-10's phony and bogus LASD-created GoPro video recordings GL1010586
22 and GL010587 that were played, presented and admitted at the evidentiary hearing of
23 February 2, 2024, that depict, display, and portray KING AROGANT shutting off his
24 GoPro camera while he was standing inside Jennifer Hutton Heger's home on February
25 21, 2023. Also on February 16, 2024, KING AROGANT spoke to corrupt criminal
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 prosecutor Diana Maria Teran after the offices of Sharon Lee Woo transferred KING
2 AROGANT's call to her. KING AROGANT demanded that Diana Teran turn over and
3 disclose a copy of George Gascón, Brian MARK Rosenberg, Victor Manuel Rodriguez,
4 Sharon Lee Woo, James William Garrison, Stephanie Pearl Mire, and DOES 1-10's
5 phony and bogus LASD-created GoPro video recordings GL1010586 and GL010587 that were
6 played, presented and admitted at the evidentiary hearing of February 2, 2024, that
7 depict, display, and portray KING AROGANT shutting off his GoPro camera while he
8 was standing inside Jennifer Hutton Heger's home on February 21, 2023

9
10 272. Between February 5, 2024, and February 23, 2024, both KING AROGANT and
11 co-counsel Neil Opdahl-Lopez requested and demanded by both email and telephone that
12 George Gascón, Brian MARK Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo,
13 James William Garrison, Stephanie Pearl Mire, and DOES 1-10 turn over copies of their
14 phony and bogus LASD-created GoPro recordings GL01586 and GL01587 that were
15 recklessly shown, presented, and admitted into the Superior Court of California, County
16 of Los Angeles, Alhambra Superior Court on April 4th, 2023, April 5th, 2023, and
17 February 2, 2024. Yet, as of November 13, 2024, George Gascón, Brian MARK
18 Rosenberg, Victor Manuel Rodriguez, Sharon Lee Woo, James William Garrison,
19 Stephanie Pearl Mire, and DOES 1-10 have all willfully, knowingly, recklessly,
20 carelessly, wantonly, maliciously, and callously failed to do so from February 23, 2023
21 until November 14, 2024 and continuing on the this very day of filing of this civil rights
22 complaint in late November 2024.

23
24 273. On February 28, 2024 KING AROGANT sent an email to Defendant George Gascon
25 (ggascon@da.lacounty.gov), Cindy J. Park (cpark@da.lacounty.gov), Victor Manuel Rodriguez
26 (vrodriquez@da.lacounty.gov), Sharon Lee Woo (swoo@da.lacounty.gov), James William

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 JUDICIAL ABUSE OF PROCESS, 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 Garrison (ggarrison@da.lacounty.gov), Stephanie Pearl Mire (smire@da.lacounty.gov), Ronald
2 Millard Geltz (rgeltz@da.lacounty.gov), Arisa Mattson (amattson@da.lacounty.gov), Diana
3 Maria Teran (SBN # 138936) (dteran@da.lacounty.gov) (charged with 11 felony counts by
4 Defendant Robert Andres Bonta in April 2024), Ricardo Daniel Garcia (County of Los Angeles
5 Public Defendant, SBN # 178111), and over seventy-five other County of Los Angeles
6 employed California State Bar licensed attorneys. In his detailed email KING AROGANT
7 requested that George Gascón, Brian MARK Rosenberg, Victor Manuel Rodriguez,
8 Sharon Lee Woo, James William Garrison, Stephanie Pearl Mire, and DOES 1-10 turn
9 over copies of their phony and bogus LASD-created GoPro recordings GL01586 and
10 GL01587 that were recklessly shown, presented, and admitted into the Superior Court of
11 California, County of Los Angeles, Alhambra Superior Court on April 4th, 2023, April
12 5th, 2023, and February 2, 2024. As of November 15, 2024, Defendant George Gascón
13 has willfully, knowingly, recklessly, carelessly, wantonly, maliciously, and callously
14 failed to respond to KING AROGANT's email that was sent to him Defendant Gascón on
15 February 28, 2024. See now a true and correct copy of KING AROGANT's February 28,
16 2024 email attached as Exhibit _____ of KING AROGANT's Verified Appendix of
17 Exhibits, and also see a true and correct image of part of the first page of KING
18 AROGANT's February 28, 2024 email below.

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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

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POST-CONVICTION DEMAND FOR THE PEOPLE AND LASD TO TURN OVER AND DISCLOSE PHONY LASD-CREATED GOPRO VIDEO RECORDINGS
GL010586 AND GL010587 (AROGANT HOLLYWOOD, et al v. ricardo garcia, et al)

Arogant Hollywood (blackoliveoil@gmail.com) Feb 1, 2024, 9:57 AM

Arogant Hollywood (blackoliveoil@gmail.com)

AROGANT HOLLYWOOD, Esq
Greatest Self-Represented Litigant in
Civil and Criminal Law History
3-0 on Charged Felony Cases Maliciously Prosecuted
Spirit of Esquire

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mrawit@pubdef.lacounty.gov
jackson@lasuperior.org

SUPERIOR
NORTHEA

people of the state of california,) Case No. GA114055
Prosecutor,) Arogant Hollywood's Emailed Request
) for Discovery for FELONY AND
) BOGUS LASD-CREATED GOPRO
) VIDEO RECORDS GL010586 AND
) GL010587
)
AROGANT HOLLYWOOD,) Date of Hearing: February 1, 2024

8:17 AM
12/15/2024

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF 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, HIED, & NEGLIGENT HIED**

1 274. On or about March 5, 2024 (just a few days after KING AROGANT had arrived at
2 North Kern State Prison, acting on behalf of electronically served Defendant George
3 Gascón, Line Operations Acting Assistant District Attorney Ronald Millard Geltz (SBN #
4 126699), and Branch and Area Operations Region II Acting Director (a position
5 previously held by Ronald Geltz, whom this director oversees Alhambra Field Office)
6 Arisa Mattson (SBN # 195578). County of Los Angeles District Attorney's Office's
7 Family Violence Division head deputy Janis Eve Johnson (SBN # 175280) personally served
8 KING AROGANT a letter that stated that all GoPro video recordings had been previously
9 turned over and that if KING AROGANT continued to contact the Alhambra Superior Court and
10 her Family Violence Division, he would be criminally prosecuted for violating bogus and
11 frivolous restraining order granted by RACIST State of California judicial officer Timothy
12 Martella that prohibited KING AROGANT from indirectly contacting rogue and dishonest
13 County of Los Angeles criminal prosecutor Brian MARK Rosenberg.

14
15 275. The only motivation behind Brian MARK Rosenberg's restraining order against KING
16 AROGANT was to prevent him from emailing him and calling his office requesting that he
17 turned over numerous pieces and articles of both exculpatory and impeaching evidence;
18 including phony and bogus LASD-created GoPro video recordings GL010586 and GL010587.
19 Brian MARK Rosenberg's granted civil harassment restraining order was so frivolous that it
20 requested relief based solely on evidence that KING AROGANT sent an email to MARK
21 Rosenberg in mid-November 2023 stating that he should go to federal prison for willfully,
22 recklessly, maliciously, and wantonly violating California Government Code § 6200.

23
24 276. On April 17, 2024, KING AROGANT was released from the California Department of
25 Corrections and Rehabilitation North Kern State Prison and was ordered to report to his
26 Pomona, California, felony parole supervision office within 48 hours of his release.

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 JUDICIAL ABUSE OF PROCESS, 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**

1 277. On April 19, 2024, KING AROGANT contacted the Superior Court of California,
2 County of Los Angeles, court-appointed private investigator Joel Wyenn and requested that he
3 turn over and provide KING AROGANT with a copy of all audio recording and video recording
4 evidence that he was given by Brian MARK Rosenberg. Joel Wyenn willfully, knowingly,
5 recklessly, maliciously, carelessly, and callously refused to give KING AROGANT any
6 evidence from frivolous felony case GA114055 by telling KING AROGANT that he had given
7 all evidence he
8 received back to Brian MARK Rosenberg.

9
10 278. On May 6, 2024, KING AROGANT placed a recorded telephone call to during the time
11 third-in-command Assistant District Attorney James William Garrison (SBN # 157070) at 9:45
12 AM by dialing (213) 257-3198, which was the business office telephone number provided for
13 the public by James Garrison on his State Bar of California attorney profile located on the
14 world-web here:

15 <https://apps.calbar.ca.gov/attorney/Licensee/Detail/157070>

16
17 James William Garrison did not answer the telephone so KING AROGANT left him the
18 following voicemail message:

19
20
21
22
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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

1 KING AROGANT:

2 *I am not in jail anymore, you racist white devil. Listen*
3 *mister James William Garrison. You know that video is*
4 *fake. In your video, I'm wearing, and, you're on a recorded*
5 *line, this is gonna get played for the court. In your video I'm*
6 *wearing a tank top. In the real video. I have a long-sleeved*
7 *shirt on. When she asked 911 what I was wearing. She*
8 *confirmed I had a long-sleeved shirt on. In the real video, I*
9 *have a long-sleeved shirt on. In the police videos I have a*
10 *long-sleeved shirt on. Therefore your video is false. There is*
11 *no way I changed my clothes. Allright. You need to turn over*
12 *that phony video. Under United States v. Bagley. Okay, And*
13 *United States v. Augurs. Supreme Court cases. As well as*
14 *California Penal Code Section 1054.1. And don't forget for*
15 *the racial justice motion racial justice motion. California*
16 *Penal Code Section 745. For the upcoming racial justice*
17 *motion and for the appeal. You need to turn over that video.*

18 279. On May 6, 2024, KING AROGANT placed a recorded telephone call to during the time
19 second-in-command Deputy District Attorney Sharon Lee Woo (SBN # 148139) at 9:50 AM by
20 dialing (213) 257-2928, which was the business office telephone number provided for the public
21 by Sharon Lee Woo on his State Bar of California attorney profile located on the world-web
22 here:

23 <https://apps.calbar.ca.gov/attorney/Licensee/Detail/148139>

24 Sharon Lee Woo did not answer the telephone so KING AROGANT left her a voicemail
25 demanding that she turn over phony and bogus LASD-created GoPro video recordings. KING
26 AROGANT told Sharon Lee Woo that the People's GoPro video recordings he was wearing a
27 tank top. KING AROGANT told Sharon Woo that she never turned over phony GoPro video
28 recordings to expert witness Thomas Leo Guzman-Sanchez. KING AROGANT told Sharon
Woo that he was seen in police video recordings wearing a long-sleeved shirt. 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 JUDICIAL ABUSE OF PROCESS, 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 told Sharon Woo that FAKE victim Jennifer Hutton-Heger told 911 dispatcher that
2 KING AROGANT was wearing a long-sleeved. KING AROGANT told Sharon Lee Woo that
3 under *Brady v. Maryland* and *United States v. Bagley* those phony GoPro video recordings could
4 be used to impeach the false testimony of Billy S. Khounthavong that those phony GoPro
5 videos GL0105086 and GL010587 came from his GoPro camera. KING AROGANT told
6 Sharon Lee Woo she needs to turn over a copy of phony GoPro video recordings for his
7 upcoming racial justice motion under California Penal Code § 745 and his motion under
8 California Penal Code § 1473. KING AROGANT told Sharon Lee Woo that her failure to turn
9 over phony GoPro video recordings will result in litigation to being filed against her in federal
10 district court.

11
12 280. On May 6, 2024, KING AROGANT placed a recorded telephone call to during the time
13 County of Los Angeles District Attorney's Office Family Violence Division deputy in charge
14 Janis Eve Johnson (SBN # 175280) at 10:05 AM by dialing (213) 257-2185. KING AROGANT
15 left a detailed voicemail for Janis Johnson to turn over phony and bogus LASD-created GoPro
16 video recordings GL010586 and GL010587.

17
18 281. On June 10, 2024, KING AROGANT contacted the County of Los Angeles District
19 Attorney's Office Public Integrity Division by dialing (213) 974-3888. KING AROGANT
20 complained to Public Integrity Division and complained that Janis Johnson, George Gascón
21 had failed to turn over and disclose a copy of phony GoPro video recording showing him
22 wearing different clothing on then he had on February 21, 2023. Further, KING AROGANT
23 complained to a Public Integrity Division employee that Defendant Gascón's criminal
24 prosecutor Brian MARK Rosenberg, willfully, knowingly, recklessly, carelessly, wantonly,
25 maliciously, and callously failed to turn over phony GoPro video recordings to RACIST expert
26 witness Thomas Leo Guzman-Sanchez who KING AROGANT got hours to examine the phony

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 JUDICIAL ABUSE OF PROCESS, 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**

1 GoPro video recordings and compare them to the real GoPro video recordings. KING
2 AROGANT told Public Integrity Division that Brian MARK Rosenberg willfully, knowingly,
3 recklessly, carelessly, wantonly, maliciously, and callously went back into court when KING
4 AROGANT had obtained the real GoPro video recordings and again brought the phony GoPro
5 video recordings and again never turns over the phony GoPro video recording. KING
6 AROGANT told the Public Integrity Division that it was a phony video because in the video he
7 was wearing a tank top, and in the real GoPro video recording KING AROGANT was wearing a
8 coat. KING AROGANT told Public Integrity Division employee he was speaking to that he
9 wanted to file a complaint against Brian MARK Rosenberg. KING AROGANT also complained
10 that MARK Rosenberg had obtained a frivolous restraining order so that KING AROGANT
11 could not contact him and request phony GoPro video recordings. As of November 17, 2024,
12 Defendant Gascón and his office have all willfully, knowingly, recklessly, carelessly, wantonly,
13 maliciously, and callously failed to discipline Brian MARK Rosenberg for his illegal actions in
14 frivolous Superior Court of California felony case GA114055.

15
16 282. On June 10, 2024, KING AROGANT placed a recorded telephone call to County of Los
17 Angeles District Attorney's Office Alhambra Field Office and requested to speak to Alhambra
18 Field Office head deputy district attorney Victor Manuel Rodriguez (SBN # 156150) at 8:50
19 AM by dialing (626) 308-5302. The recorded call conversation between KING AROGANT and
20 Victor Manuel Rodriguez's secretary Cristina, and then between KING AROGANT and Victor
21 Manuel Rodriguez went like this as transcribed by KING AROGANT:

22
23 CHRISTINA: This is Christina.

24
25 KING AROGANT: Christina you an attorney?
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 JUDICIAL ABUSE OF PROCESS, 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 CHRISTINA: No, no, this Christina, I'm the secretary. How can I help you?

2
3 KING AROGANT: Oh, oh you the secretary for Victor?

4
5 CHRISTINA: I'm sorry?

6
7 KING AROGANT: You're the secretary for Victor?

8
9 CHRISTINA: Ah, his secretary V is out today. I am the backup. [REDACTED] What
10 can I do for you?

11
12 KING AROGANT: All rights, so look. Ah, I was calling because Rosenberg, and
13 Victor to turn over these Goro videos. So there's some GoPro
14 videos and they never turned over these GoPro videos. And I
15 know Janet Johnson's trying to say in her papers that they turned
16 over the videos, but I just reviewed the emails with the
17 Investigator, and there was only an order for them to turn over
18 the real videos, even though I asked the judge to have them turn
19 over the phony videos, they were never turned over. And so
20 there's a policy I'm I'm going to get it for you. There's a policy the
21 DA policy uh discovery compliance system manual. Okay. It was
22 revised in 2022. This required Rosenberg to turn over the videos,
23 and also, there's another uh legal legal policies manual, chapter
24 14, that requires them to turn over the video. So like even if you
25 their saying these, you guys turn over the videos, before, what is
26 the big deal about turning over the video again? Like I never
27 received the video. The investigators never received the video.

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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IED**

1
2 The expert witness who was hired, you know, to to compare the
3 real video to the phony video, he also never received a video. So
4 there is no evidence that anybody received the video. They need to
5 turn over the video.

6
7 CHRISTINA: So, is this on a pending case, or is this on a case that's already been
8 completed?

9
10 KING AROGANT: Yeah, I mean. Well you can call it completed. I don't call it
11 completed. I've already been convicted, but I'm moving to
12 overturn. I'm I'm filing a motion to demand the people to turn over
13 this video and I also filing a racial justice motion. So I am I sent an
14 email to the DA over the weekend that shows that I shouldn't have
15 been sent to prison and that already under 745; this case could be
16 overturned because the the expert witness lied on the stand and
17 said I threatened him. But I just sent you guys the auto recording
18 and and transcript that shows on that call I never threatened him.
19 The call that he testified to and he said that he was going to report
20 me that was sent to the DA that shows I never threatened. So,
21 already, we have a racial justice motion just on that. ^[P]_[SEP]But I want
22 the phony videos. I have a right to have those videos in the video.
23 I'm wearing a tank top, but I sent you guys steal images from the
24 real video that shows me wearing a coat.

25
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, & NEGLIGENCE IED**

1 CRISTINA: So I mean, basically, you just want the videos, and that's all that
2 you're calling for?

3
4 KING AROGANT: That's all. I want the phony videos, GL010586.

5
6 CRISTINA: What's the phony video? What's the phony video? What do you
7 mean by phony?

8
9 KING AROGANT: It's phony. In the video that he showed to the court I'm wearing a
10 tank top. On the day of the alleged crime I had a coat on. [REDACTED] The
11 lady even told 911 that I had a long-sleeve shirt on. And I sent you
12 guys an email that shows a reflection in the real videos.

13
14 CHRISTINA: Okay, Arogant, you need to calm down because I'm just a
15 secretary. I'm receiving the message and you your anger is
16 towards the wrong person and this is why nobody wants to help
17 you because you get very aggressive you know and I'm the only
18 one that was willing to talk to you out of all the secretaries
19 here, okay and I'm trying to be cool with you and I'm trying to get
20 you what you need, but you need to calm down because no one's
21 going to help you with that attitude. Okay.

22
23 KING AROGANT I'm not doing anything wrong.
24
25
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, & NEGLIGENCE IED**

1 CHRISTINA: I'm not saying you're doing anything wrong but you're coming at
2 me kind of aggressive. See what I'm saying? And I don't want to
3 end this call so basically I will, Victor's not here. I will send him
4 a message and let him know that you want the phony videos.

5
6 KING AROGANT: Yeah, GL010586 and GL010587

7
8 CHRISTINA: Hold on. Say that again so I can read it write it down. GO?

9
10 KING AROGANT: Capital G and then L and then zero one zero five eight six and
11 GL zero one zero five eight seven five eight seven Okay.

12
13 CHRISTINA: And what is a good callback number for you?

14
15 KING AROGANT: Three two three two four zero two four zero yeah zero six four
16 three zero six point three okay

17
18 CHRISTINA: Okay, you know what, Victor just came in. Let me transfer you
19 over. Give me one second okay.

20
21 KING AROGANT: He won't talk to me. Just take a message for me please.

22
23 CHRISTINA: No, I'm a transfer you. Give me one second, okay?

24
25 KING AROGANT: He won't talk to. I know Victor.

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 JUDICIAL ABUSE OF PROCESS, 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, HIED, & NEGLIGENT HIED**

1 CHRISTINA: He just came and told me to transfer the call.

2
3 KING AROGANT: Okay.

4
5 CHRISTINA: Okay, one second.

6
7 VICTOR MANUEL RODRIGUEZ: Good morning.

8
9 KING AROGANT: What's your name?

10
11 VICTOR MANUEL RODRIGUEZ: Victor Rodriguez.

12
13 KING AROGANT: Yeah, so there's uh the the phony videos that
14 were shown at the prelim and on uh February
15 2nd, those videos and never been turned over
16 to me.

17
18 VICTOR MANUEL RODRIGUEZ: You gave us a copy of the video and we
19 introduced that video into evidence and it in
20 the uh the clerk sent it to the, ah, exhibits clerk

21
22 KING AROGANT: No, no I'm not talking about that video. I'm
23 talking about the one LASD created. The
24 video you showed to the judge on February 2,
25 2024 I'm wearing a tank top. Have you seen
26 that video again? I'm wearing a tank top.

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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IED**

1 VICTOR MANUEL RODRIGUEZ:

I don't know but you're going to have to go court for whatever it is that you want.

2
3
4 KING AROGANT:

No, under the LA County policy manual. Right here. The discovery compliance system manual for DA's office. You are required to turn it over. You are also required to turn it over under 1054. You never turned that video over sir.

5
6
7
8
9
10
11 VICTOR MANUEL RODRIGUEZ:

You're going to have to go to court, you have to file motion because everything has been turned over to you.

12
13
14
15 KING AROGANT:

No, you never turned over the video. Who did you turn it over to?

16
17
18 VICTOR MANUEL RODRIGUEZ:

I'm not going to sit here and argue with you.

19
20
21 KING AROGANT:

You showed the judge over and over you never gave it to me. You never even gave it to the expert witness. The expert witness even put it in his declaration that he never received that phony video.

22
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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IED**

1 KING AROGANT

Okay, you never turned it over.
And under Chapter 14 of the Legal
Policies of the DA's Office.
Disclosure of exculpatory and
impeaching evidence you're
supposed to turn it over.

2
3
4
5
6
7
8
9 VICTOR MANUEL RODRIGUEZ:

That that evidence doesn't exist
only incriminating evidence so if
you have something else you
should go to court.

10
11
12
13
14 KING AROGANT:

There's no incriminating. You're
incriminating me with a phony
video. I'm not even wearing the
same clothes.

15
16
17
18
19 VICTOR MANUEL RODRIGUEZ:

The judge made a determination.

20
21 KING AROGANT:

I don't care what the judge did. I
have right to have that video for
my appeal. I have a right to have
that video for my racial justice
motion. You know my racial
justice motion?

22
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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 VICTOR MANUEL RODRIGUEZ:

We're not giving anything else to
2 you, sir. You're have to go to court
3 to get whatever it is that you seek
4 and we'll

5
6 KING AROGANT:

You're going to give me that video. I
7 don't care if I have to go to federal court,
8 and you guys are going to go to jail
9 when I get it. And I know you're going to
10 try to destroy it. I'm going to get that
11 video. I'm going to get that video and
12 I'm going to press you every day until I
13 get that video I'm making a complaint
14 downtown. I'm making complaint
15 downtown for Rosenberg so let's see
16 what happens when a complaint goes to
17 Rosenberg if I don't get that video.
18 You guys got email you know you have
19 that video. You just don't want to give it
20 to me because you know you falsified
21 evidence. I'm not even wearing the same
22 clothes.

23
24 VICTOR MANUEL RODRIGUEZ:

Sir, you should stop calling here.

25
26
27
28 **Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
KING AROGANT: & 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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, FIDELITY, &
NEGLIGENT HED**

1 KING AROGANT:

In that video why am I wearing a tank top? In that video why am I wearing a tank top?

2
3
4
5 VICTOR MANUEL RODRIGUEZ:

I am not going to argue about any video with you.

6
7
8 KING AROGANT:

Why don't you answer the question. Why am I wearing a tank top in your phony video? Why am I wearing a tank top in your phony video? The answer is it wasn't recorded on the 21st sir. Did you see the images I sent you? I have a coat on in the real video. You're in trouble. I have a coat on in the real video. But you are saying my videos are fake and yours are real right? Why am I not wearing the same clothes huh? Why am I wearing coat in the real video? Why in your video I got a tank top on? Why in your video you can see my whole body.

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22
23 VICTOR MANUEL RODRIGUEZ:

I'm I'm gonna hang up on you sir. I'm going to hang up on you because you're just yelling and we're getting nowhere. I've told you we're not turning anything

24
25
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, & NEGLIGENCE IED**

1 VICTOR MANUAL RODRIGUEZ:

else over to you. Everything's been
2 turned over. You had a 1054.

3
4 KING AROGANT:

You never turned that video over..
5 Who did you turn it over to? Who did
6 you turn it over to? Why don't you
7 answer the question? You can't
8 answer the question. Who did you
9 turn the video over to? Both of my
10 private investigators never got that
11 video.

12
13 VICTOR MANUEL RODRIGUEZ;

You know, Mr. Rosenberg handles
14 this case. You know I only handle
15 the post never received that video.

16
17 KING AROGANT

Okay, both of the private
18 investigators never received that
19 video. The expert witness never
20 received that video. So again, who
21 did you turn it over?

22
23 VICTOR MANUEL RODRIGUEZ:

You are going to need to go to
24 court. You are going to need to file
25 a motion.

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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 KING AROGANT:

I am going to court. I am going to
2 court.

3
4 VICTOR MANUEL RODRIGUEZ:

Okay, great. Well, all right.
5 We'll deal with it in court.

6
7 KING AROGANT:

Before I get there I'm going to
8 make sure it is clear that I
9 already asked you for the video
10 and I told you under the DA
11 policy. The legal policy manual
12 you are supposed to turn over
13 that video. And I'm gonna make
14 a complaint against Rosenberg
15 in downtown LA. The
16 investigators are going to call
17 me back And I guarantee you
18 I'm going to get that video
19 before we go to court.

20
21
22 VICTOR MANUEL RODRIGUEZ:

You know you shouldn't come here.
23 What? You can you want to say you
24 want to send an investigator, that's
25 fine, but you better not show up here
26 to my office.

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, HED, & NEGLIGENT HED**

1 KING AROGANT:

What?

2
3 VICTOR MANUEL RODRIGUEZ:

You wanna send your investigator,
that's fine. But you better not show
up here to my office

4
5
6
7 KING AROGANT:

I will show up to your office. What
are you going to do? Have me
arrested for your fake restraining
order that should have never been
issued? ^[P]_[SEP] I'm slapping that this
month. Your restraining order isn
getting slapped. Yeah, I got six
months to file my default. I'm
slapping that this shit this month..
All right? That restraining order has
no merit.

8
9
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14
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16
17
18
19 VICTOR MANUEL RODRIGUEZ:

You better not come around here
and threaten or harass anyone.

20
21
22 KING AROGANT:

Man, you threaten me.

23
24 VICTOR MANUEL RODRIGUEZ:

No, I'm just telling you not to
come around.

25
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, FIDELITY, & NEGLIGENT FIDELITY**

1 KING AROGANT:

You're a racist bro. You're a racist.
You're a racist. You got something
against me because I'm Black. Cause
you know I did not break no law.
You've seen all the real videos. You've
seen the phony videos. You guys are
going to go to jail at the end of the day.
You're the criminal in this case.

10 VICTOR MANUEL RODRIGUEZ:

All right. All right, okay. All right
okay. I'm going to hang up. That's the
end of this call, bye.

15 283. On October 14, 2024 at approximately 10:04 AM, KING AROGANT placed a recorded
16 telephone call to County of Los Angeles District Attorney's Office Alhambra Field Office and
17 requested to speak to Alhambra Field Office head deputy district attorney Victor Manuel
18 Rodriguez (SBN # 156150) at 8:50 AM by dialing (626) 308-5302 and requesting to be
19 transferred to Victor Rodriguez. On the recorded telephone conversation KING AROGANT
20 again requested that Victor Manuel Rodriguez turn over and disclose to him a copy of phony
21 and bogus LASD-created GoPro video recordings GL010586 and GL010587. Victor Rodriguez
22 told KING AROGANT that the phony GoPro video recordings GL010586 and GL010587 were
23 admitted into evidence and given to the Superior Court of California, County of Los Angeles,
24 Alhambra Superior Court exhibit evidence clerk. Again, Victor Manuel Rodriguez refused to
25 turn over and disclose a copy of the phony LASD GoPro video recordings GL010586 and
26 GL010587 to KING AROGANT. The October 14, 2024 recorded telephone conversation

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 JUDICIAL ABUSE OF PROCESS, 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 between KING AROGANT and rogue County of Los Angeles criminal prosecutor Victor
2 Manuel Rodriguez went exactly like the following:

3
4
5 KING AROGANT:

So let's talk about the audio recording
with the expert witness. Did you
review the audio recording?

6
7
8
9 VICTOR MANUEL RODRIGUEZ:

Sir, I'm not I'm not gonna talk about
the specifics of the the case.

10
11
12 KING AROGANT:

I'm asking you if you reviewed the
audio recording that I sent you.

13
14
15 VICTOR MANUEL RODRIGUEZ:

We have no, I'm not gonna be talking.
You're probably. You don't have
permission to record me. That would
be a crime right now.

16
17
18
19
20 KING AROGANT:

Okay, well, then charge me, because
this this call is always gonna be
recording.

21
22
23
24 VICTOR MANUEL RODRIGUEZ:

Okay. Well, like I said.

25
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, HED, & NEGLIGENCE HED**

1 KING AROGANT:

You sitting up here and saying I'm calling up here threatening people, of course I'm gonna record. You accuse me of threatening how many employees?

2
3
4
5
6
7 VICTOR MANUEL RODRIGUEZ:

Calling my office, making threats

8
9
10 KING AROGANT:

I'm not making no threats. You're getting sued. Gascón is getting sued before the election, my word. My word. So this is the final time I'm calling you to tell you that you need to cease and desist from violating my rights. You need to turn over that GoPro video, and under rule 3.8, you need to overturn my conviction because you got an audio recording that I didn't threaten the expert. Did you not get an audio recording that shows...I'm heard not threatening the expert?

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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, FIDELITY, & NEGLIGENT FIDELITY**

1 KING AROGANT:

You sitting up here and saying I'm
2 calling up here threatening people,
3 of course I'm gonna record. You
4 accuse me of threatening how many
5 employees?

6
7 VICTOR MANUEL RODRIGUEZ:

Calling my office, making threats

8
9
10 KING AROGANT:

I'm not making no threats. You're
11 getting sued. Gascón is getting sued
12 before the election, my word. My
13 word. So this is the final time I'm
14 calling you to tell you that you need
15 to cease and desist from violating
16 my rights. You need to turn over
17 that GoPro video, and under rule
18 3.8, you need to overturn my
19 conviction because you got an
20 audio recording that I didn't
21 threaten the expert. Did you not
22 get an audio recording that
23 shows...I'm heard not threatening
24 the expert?

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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, & NEGLIGENCE IIED**

1 VICTOR MANUEL RODRIGUEZ:

I'm not gonna...

2
3 KING AROGANT:

All right, well, argue that in federal court, but a cease and desist letter is getting served on you. A cease and desist letter get served on.

4
5
6
7
8 VICTOR MANUEL RODRIGUEZ

All right.

9
10 KING AROGANT:

Okay.

11
12 VICTOR MANUEL RODRIGUEZ:

Okay, bye.

13
14
15 284. Paragraphs 266-284 of this original civil rights complaint prove by clear and convincing
16 evidence that Defendant George Gascón and DOES 1-10 willfully, knowingly, carelessly,
17 recklessly, maliciously, wantonly, and callously committed under color law FRAUD, under
18 color of law DECEIT, under color NEGLECT TO DUTY AID AND ASSIST KING
19 AROGANTwith overturning his wrongful conviction, under color Due Process Clause
20 constitutional violations, and reckless violations of the United States Constitution. Defendant
21 George Gascón, the office of George Gascón, his County of Los Angeles criminal prosecutors
22 involved with frivolous Superior Court of California case GA114055, and DOES 1-10's illegal
23 acts, actions, misconduct, misdoings, misdeeds, and transgressions alleged in paragraphs 266-
24 283, disqualify Defendant George Gascón and DOES 1-10 from obtaining any type, shape, or
25 form of judicial, electoral, or prosecutorial immunity in this original civil rights action.
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 **G. DEFENDANT CHERYL LYNN KAYLOR COMMITTED RECKLESS UNDER**
2 **OF LAW FRAUD, RECKLESS UNDER COLOR OF LAW DECEIT AND**
3 **CONSPIRED WITH CDCR PEACE OFFICERS AND DEFENDANTS TO**
4 **VIOLATE KING AROGANT'S FOURTEENTH AMENDMENT**
5 **CONSTITUTIONAL CIVIL RIGHTS.**

6
7 285. Plaintiff KING AROGANT hereby restates, realleges, reiterates, reincorporates,
8 and incorporates by reference previous paragraphs 1-284 of this original civil rights
9 complaint.

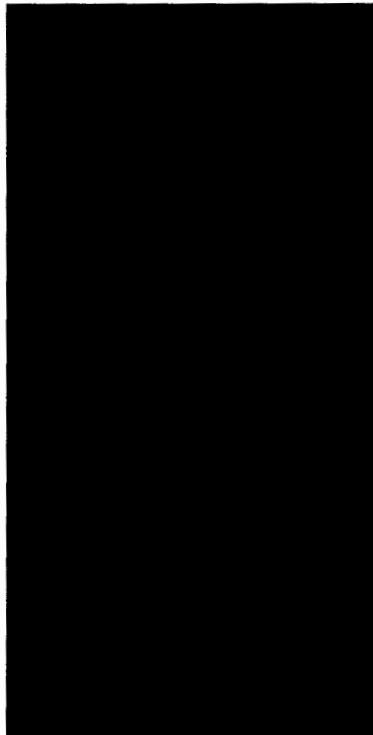
10
11 286. KING AROGANT has been in a loving and happy polyamorous and open relationship
12 with his fiancée Alison Helen Fairchild (**hereinafter "Fairchild"**) since September 19, 2012.
13 KING AROGANT and Fairchild have been engaged to be married since February 14, 2014.
14 Through California common law, Alison Helen Fairchild became KING AROGANT's
15 common-law wife on September 20, 2019.

16
17 287. KING AROGANT met Defendant Cheryl Lynn Kaylor (**hereinafter "Kaylor"**) in
18 November 2017 because he was a passenger in her care with his then girlfriend Habiba White
19 also riding in the front passenger seat of Kaylor's vehicle. Habiba White paid Kaylor to drive for
20 her and pick up her young children from school and then drop them off at their home. Shortly
21 thereafter KING AROGANT began paying Kaylor to drive him places such as to his bank,
22 Superior Court locations, federal court buildings, to serve legal papers on natural persons and
23 corporations, and to various post office locations.

24
25 288. Between late October 2019 and December 2022 KING AROGANT and Kaylor had a
26 very close romantic and sexual relationship. KING AROGANT and Kaylor's physical

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, & NEGLIGENCE IED**

1 relationship because so close that Kaylor would often rent cars and U-Haul trucks for KING
2 AROGANT, pay for him to stay at hotels, rent storage units for KING AROGANT, and give
3 him access to her UBER accounts. See below a screenshot of KING AROGANT's access to
4 Kaylor's UBER account. See below also a screenshot of the settlement agreement of an
5 unlawful detainer filed by Public Storage Inc. for a self-storage unit Kaylor put in her name so
6 KING AROGANT could occupy it.



1 LEWIS BRISBOTH BISGAARD & SMITH LLP
 2 10000 W. 10th Street, Suite 2000
 3 F-Mail: (626) 296-0000, info@lbbis.com
 4 631 West 39th Street, Suite 4000
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 7 Facsimile: 213.250.7990

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Attorneys for Plaintiff
 PUBLIC STORAGE

SUPERIOR COURT OF THE STATE OF CALIFORNIA
 COUNTY OF SAN BERNARDINO, FONTANA DISTRICT

PUBLIC STORAGE, CASE NO. UJMN1906416
 Plaintiff,

vs. STIPULATION RE: SETTLEMENT AND
 TEMPORARY STAY OF ENFORCEMENT

CHERYL KAYLOR, an individual, Department: F2
 Defendant. Trial Date: None Set

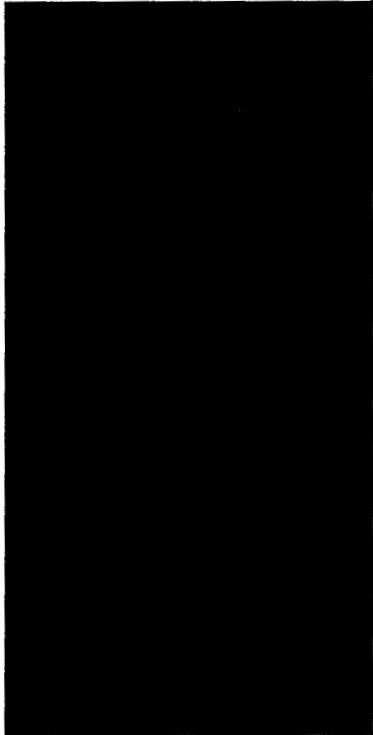
1. Upon full execution of this stipulation by the parties, any enforcement proceedings are deemed stayed through and until December 1, 2019.

2. Defendant will remove or cause to be removed all of her items out of her storage unit located at Public Storage, 5518 Arrow Hwy, Montclair, California, Storage Space #279 ("the Space") on or before close of business, December 1, 2019 (hereinafter "the Move-out").

3. Defendant may engage and contract with any reputable moving company of defendant's choice to accomplish the Move-out. Plaintiff will play no role in the retention or selection of said moving company. Upon submission of an invoice from the moving company, if any, selected and retained by defendant, plaintiff shall promptly pay up to a maximum of 1,000.00, the actual cost of the move-out to the moving company.

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STIPULATION RE: SETTLEMENT AND TEMPORARY STAY OF ENFORCEMENT



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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

2:25 [signal icons]

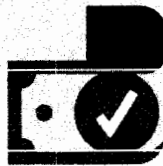
[location icon] [wifi icon] [cellular icon] 8% [battery icon]

←
Receipt

Receipt including tip

February 21, 2024

**Thanks for
tipping,
Cheryl**



Total \$28.37

As a result of expenses associated with California's commercial auto insurance requirements, the Booking Fee has increased.

Trip fare \$10.07

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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

2:26 [signal strength] •

[location] [wifi] [cellular] 9% [battery]

Cheryl Kaylor



★ 5.0 Verified



Help



Wallet



Activity

Try Uber One free

Unlock 6% Uber Cash on rides and more



Safety checkup

Learn ways to make rides safer



Privacy checkup

Take an interactive tour of your privacy settings



Estimated CO₂ saved

🌿 582 g



Family and teens

Teen and adult accounts



Home



Services



Activity



Account

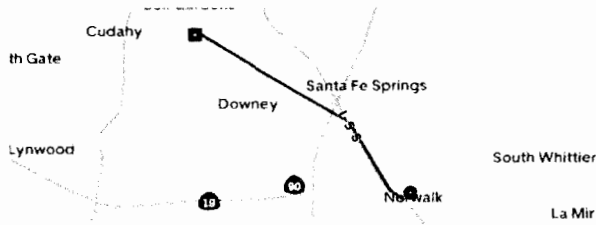


Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, Violation 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

2:25 [signal icons]

[location icon] [wifi icon] [cellular icon] [battery icon] 8%

← Ride details



Uber Green ride with Jiayuan

Feb 21 5:19PM

\$24.67

[receipt icon] Receipt

● 12720 Norwalk Blvd, Norwalk, CA 90650-3169, US 5:32 PM

■ 6850 Florence Ave, Bell Gardens, CA 90201-4946, US 6:02 PM

[tip icon] \$3.70 tip added

[star icon] Rated 5 [star icon]

View what your driver sees

[lock icon] After your ride, driver can't see your pickup or dropoff address details



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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED

1 289. Between December 2019 and September 2022, KING AROGANT stayed at Kaylor's
2 home 2 to 3 days a week. As KING AROGANT had a very volatile U.S. equities and derivatives
3 day trading career. Cheryl Lynn Kaylor would often loan KING AROGANT money for short
4 periods of time while KING AROGANT's trading portfolio was in the red. Then, when KING
5 AROGANT had a big trading day or a big trading week, he would pay Kaylor back double what
6 she had originally loaned KING AROGANT. Between December 2019 and September 2022,
7 Defendant Kaylor would pick KING AROGANT up in her car and bring him to her house.

8
9 290. In early March 2020 Kaylor was forced to quit her full time UBER driving job amid the
10 unexpected and unpredicted COVID-19 outbreak and pandemic.. Prior to quitting her full time
11 UBER driving job Kaylor earned approximately \$ 800.00 per week. During all of March 2020
12 KING AROGANT was earning a lot of money suddenly as he intelligently bet against U.S.
13 stock indices and individual stocks by purchasing long put contracts on SPY, QQQ, TSLA,
14 GOOG, and other stocks and exchange traded funds. For example, in just three trading days in
15 early March 2020 KING AROGANT made over \$ 10,000 by holding and then selling Standard
16 and Poor 500 E-Mini long put futures options. The sudden and unprecedented spread of
17 coronavirus disease caused absolute terror in the stock market as airlines, hotels, casinos, and
18 restaurant stocks plummeted and took the rest of the U.S. equity markets along for the ride.
19 Struggling to pay her bills and mortgage in March 2020 Kaylor reached out to KING
20 AROGANT for financial assistance and help in mid-March 2020. KING AROGANT agreed to
21 help Kaylor by giving her \$ 10,000 upfront, and then continuing to make monthly payments
22 every month between \$ 725.00 and \$ 800.00 depending on his ability to pay on the following
23 written and verbal agreement:

24
25
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 JUDICIAL ABUSE OF PROCESS, 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 1. Cheryl Lynn Kaylor would sign a written agreement giving KING AROGANT 30% of
2 homeownership at the real property located at 13732 Runnymede Street, Van Nuys,
3 CA 91405.
- 4
- 5 2. At the time of Cheryl Lynn Kaylor's next mortgage refinance she would put down
6 Arogant Hollywood a signor and written witness of refinance.
- 7
- 8 3. All monthly payments towards the mortgage would be considered monthly rental
9 payments if Arogant Hollywood was physically lived at 13732 Runnymede Street,
10 Van Nuys, CA 91405.
- 11

12 291. The legal and written agreement was signed by Arogant Hollywood and Cheryl Lynn
13 Kaylor. KING AROGANT had suggested that he send Kaylor \$ 10,000 by Paypal so that they
14 could both keep official records of the large monetary payment. Kaylor told KING AROGANT
15 that she did not want IRS to track her down and have to pay taxes on the large \$ 10,000
16 payment. Kaylor told KING AROGANT to pay her \$ 5,000 in cash and the other \$ 5,000 in
17 Bitcoin. KING AROGANT complied with Kaylor's request by giving her \$ 5,000 in cash and
18 then by sending the remaining \$ 5,000 payment from his Binance cryptocurrency account to
19 Kaylor's mobile phone Bitcoin digital wallet address.

20

21 292. From April 2020 until he stopped making monthly payments to Kaylor in mid-June 2024
22 after she used CDCR peace officers to lock KING AROGANT out of his home, KING
23 AROGANT stayed consistent in making monthly payments except when he was incarcerated.
24 While KING AROGANT was incarcerated, his common-law wife and fiancée Alison Helen
25 Fairchild, made reduced payments of \$ 600.00 a month.

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 JUDICIAL ABUSE OF PROCESS, 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**

1 293. Due to working in the Pasadena area and having ongoing criminal cases pending in both
2 Pasadena and Alhambra Superior Courts. KING AROGANT did not begin living in his partially
3 owned home until late October 2023, but KING AROGANT also spent a lot of time in 2022 and
4 2023 every week at his fiancée Alison Helen Fairchild's apartment.

5
6 294. During the fall of 2022, Kaylor refinanced her home, and KING AROGANT signed on
7 her mortgage refinance.

8
9 295. Between November 2019 and December 2022 Kaylor developed hatred, envy, and
10 jealousy towards Alison Helen Fairchild. When Kaylor and KING AROGANT's romantic and
11 sexual relationship ended Kaylor blamed the reason for it ending on Fairchild.

12
13 296. From October 2022 until KING AROGANT was arrested on December 11, 2023 Kaylor
14 and KING AROGANT got along great while living together at 13732 Runnymede Street, Van
15 Nuys, Ca 91405.

16
17 297. After KING AROGANT was released from prison on April 17, 2024 up until April 29,
18 2024 KING AROGANT and Kaylor got along great while living together. On or about April 30,
19 2024 Fairchild moved into KING AROGANT's home located at 13732 Runnymede Street, Van
20 Nuys, CA 91405. While Kaylor gave Fairchild permission to live with her because KING
21 AROGANT was part owner of the home located at 13732 Runnymede Street, Van Nuys, CA
22 91405, she hated living with Fairchild. Kaylor's ongoing and continuous hatred and bitterness
23 towards Fairchild (while Fairchild had always been nice and friendly towards Kaylor) proves by
24 clear and convincing evidence that she fully blames Fairchild for ending her relationship with
25 KING AROGANT.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 298. In late April 2024 or in very early May 2024, when KING AROGANT injured his back
2 and could barely walk, he requested that Kaylor drive to Home Depot and make house keys for
3 Fairchild. While Kaylor complied with KING AROGANT's request, she did not want Fairchild
4 to have keys to enter her home at any time.

5
6 299. As KING AROGANT and Kaylor's friendship started to deteriorate in early May
7 2024. Kaylor sided with her male contractor friend who showed up to her house one day
8 in mid May 2024 and began harassing KING AROGANT by accusing KING
9 AROGANT of pulling a knife on Kaylor, and by making fighting word statements that
10 KING AROGANT was taking it up his ass in prison. At first KING AROGANT
11 approached this 50's years-old Caucasian man, but Kaylor's next door neighbor
12 intervened and helped KING AROGANT stay calm. KING AROGANT then
13 immediately thereafter contacted 911 dispatch and requested that City of Los Angeles
14 peace officers respond to his house. After city of Los Angeles peace officers responded
15 they detained KING AROGANT, placed him in a marked police vehicle, and searched
16 his bedroom and living room. After releasing KING AORGANT from their marked
17 marked vehicle KING AROGANT saw Kaylor talking to city of Los Angeles peace
18 officers as he was walking back inside and returning inside his home. From that moment
19 on KING AROGANT viewed Kaylor as an enemy, and thus, not just their relationship
20 had ended but now KING AROGANT and Kaylor's remaining platonic relationship was
21 completed dissolved as well.

22
23 300. From the date of the incident on or about May 6, 2024 until around May 18, 2024 KING
24 AROGANT did not communicate with or contact Kaylor in person, by email, by United States
25 Postal Service, or by telephone

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 JUDICIAL ABUSE OF PROCESS, 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**

1 301. On May 18, 2024 Kaylor became very angry and aggressive when KING AROGANT
2 moved window panes and boxes from the hallway to allow Fairchild's access to the home's
3 bathroom. KING AROGANT called city of Los Angeles police department on May 18, 2024 at
4 approximately 9 AM. After city of Los Angeles peace officers arrived they sided with KING
5 AROGANT and told Kaylor that he had a right to move items that were blocking Fairchild's
6 path and access because she needed to get to the bathroom. Kaylor continued to be
7 argumentative and adamant that these responding city of Los Angeles peace officers allow her to
8 have a bunch of windows and boxes blocking Fairchild access to the house's only bathroom
9 with the exception of the bathroom located inside of Kaylor's master bedroom. Displaying clear
10 signs of dementia and mental health illness, Kaylor argued with the city of Los Angeles peace
11 officers for nearly twenty minutes and went nowhere. Kaylor did not care that Fairchild had
12 already injured herself by running into window panes blocking her path in the hallway leading
13 to the bathroom because Kaylor hates Alison Helen Fairchild. City of Los Angeles peace
14 officers told Kaylor over and over again for approximately twenty consecutive minutes that her
15 issue with KING AROGANT moving items in the hallway was a civil matter, and further, they
16 continuously told Kaylor that KING AROGANT had a right to move items from the hallway
17 that were blocking Fairchild's physical access. Responding city of Los Angeles peace officers
18 departed the house located at 13732 Runnymede Street, Van Nuys, CA 91405, without even
19 providing Kaylor with an incident number. After city of Los Angeles peace officers departed the
20 home both KING AROGANT and Fairchild told Kaylor that she was going to get sued.

21
22 302. On June 4, 2024 Fairchild filed an original civil complaint against Kaylor in the United
23 States District Court for the Northern District of California. Shortly thereafter, on or about June
24 5, 2024, KING AROGANT overheard Kaylor speak to a County of Los Angeles Adult
25 Protective Services male social worker by secretly standing outside Kaylor's master bedroom
26 located at 13732 Runnymede Street, Van Nuys, CA 91405. While standing outside of Kaylor's

27
28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
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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 master bedroom KING AROGANT overheard Defendant Cheryl Lynn Kaylor tell the following
2 outlandish and fabricated verbal statements to the County of Los Angeles Adult Protective
3 Services social worker she was speaking to on the telephone from her master bedroom:
4

- 5 1. That Aroant Hollywood had raped her in the past.
- 6 2. That Arogant Hollywood struck her with a closed fist and open hand in the past.
- 7 3. That Arogant Hollywood was verbally and emotionally abusive to her in the past.
- 8 4. That Arogant Hollywood had threatened to kill Cheryl Lynn Kaylor in the past.
- 9 5. That Arogant Hollywood stole money from her.
- 10 6. That Arogant Hollywood blocked her access to food in her house from her kitchen
11 cabinets, refrigerator, and freezer.
- 12 7. That Arogant Hollywood was committing acts of FRAUD to take Cheryl Lynn Kaylor's
13 house away from her by extorting through the courts and by extorting Kaylor through
14 the courts and the filing of lawsuits.
- 15 8. That Arogant Hollywood had stalked and followed Cheryl Lynn Kaylor in the past.
- 16 9. That Arogant Hollywood had harassed Cheryl Lynn Kaylor in the past.
- 17 10. That Arogant Hollywood often yelled and screamed profanities, vulgarities, and
18 obscenities to Cheryl Lynn Kaylor both over the telephone and in person.
- 19 11. That Arogant Hollywood made numerous criminal threats in the past that he
20 would kill members of Kaylor's family.

21
22
23 303. Cheryl Lynn Kaylor committed recklessly under color of law fraud and reckless under
24 color of law deceit by misrepresenting, lying to, fabricating lies that KING AROGANT had
25 committed domestic violence and elder abuse against Kaylor and otherwise deceiving County of
26 Los Angeles Adult Protective Services social workers and employees, which was done by
27 Defendant Kaylor for the unlawful purposes of illegally gaining possession of

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
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AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IED, &
NEGLIGENT IED**

1
2 KING AROGANT's real property without KING AROGANT being afforded and opportuned
3 Due Process by Defendant Kaylor recklessly using unfair, unjust, illegal, unlawful, and
4 unconstitutional under color of law fraud to gain an unfair advantage over KING AROGANT.
5

6 304. On information and belief Defendant Cheryl Lynn Kaylor told the following to Pomona
7 Field Officer and Division of Adult Parole Supervision headquarters CDCR peace officers over
8 the telephone, in person, and by electronic mail between May 28, 2024 and June 15, 2024 only:
9

- 10 1. That Arogant Hollywood had raped her in the past.
- 11 2. That Arogant Hollywood struck her with a closed fist and open hand in the past.
- 12 3. That Arogant Hollywood was verbally and emotionally abusive to her in the past.
- 13 4. That Arogant Hollywood had threatened to kill Cheryl Lynn Kaylor in the past.
- 14 5. That Arogant Hollywood stole money from her.
- 15 6. That Arogant Hollywood blocked her access to food in her house from her kitchen
16 cabinets, refrigerator, and freezer.
- 17 7. That Arogant Hollywood was committing acts of FRAUD to take Cheryl Lynn Kaylor's
18 house away from her by extorting through the courts and by extorting Kaylor through
19 the courts and the filing of lawsuits.
- 20 8. That Arogant Hollywood had stalked and followed Cheryl Lynn Kaylor in the past.
- 21 9. That Arogant Hollywood had harassed Cheryl Lynn Kaylor in the past.
- 22 10. That Arogant Hollywood often yelled and screamed profanities, vulgarities, and
23 obscenities to Cheryl Lynn Kaylor both over the telephone and in person.
- 24 11. That Arogant Hollywood made numerous criminal threats in the past that he
25 would kill members of Kaylor's family.
26

27 305. Defendant Cheryl Lynn Kaylor committed reckless under color of FRAUD by
28 Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
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AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, &
NEGLIGENT IIED

1
2 misrepresenting to, lying to, fabricating lies, and otherwise deceiving CDCR peace
3 officers to believe that KING AROGANT had committed acts of violence and elder
4 abuse to Kaylor so that they would foolishly assist with her planned and conspired under
5 color of law self-help eviction of KING AROGANT, which was done by Kaylor for the
6 unlawful purpose of gaining possession of KING AROGANT's real property and 30%
7 homeownership of real property located at 13732 Runnymede Street, Van Nuys, CA
8 91405 using unfair, unjust, unlawful, unconstitutional fraud methods.

9
10 306. Defendant Cheryl Lynn Kaylor committed reckless under color of DECEIT by
11 hiding from, concealing from, failing to inform, failing to disclose, and otherwise
12 deceiving CDCR peace officers that KING AROGANT called the police on Kaylor and
13 her male friend twice during the month of May 2024, that in early June 2024 KING
14 AROGANT's fiancée Fairchild sued her, so that they would foolishly assist with her
15 planned and conspired under color of law self-help eviction of KING AROGANT, which
16 was done by Kaylor for the unlawful purpose of gaining possession of KING
17 AROGANT's real property and 30% homeownership of real property located at 13732
18 Runnymede Street, Van Nuys, CA 91405 using unfair, unjust, unlawful, unconstitutional
19 fraud and deceit methods.

20
21 307. The evidence before this United States District Court proves by clear and
22 convincing evidence that Defendant Cheryl Lynn Kaylor had a meeting of minds and
23 more than one secretly planned meeting with CDCR peace officers where they met
24 secretly planned and agreed to not only self-help evict KING AROGANT but to also
25 remove KING AROGANT's fiancée Alison Helen Fairchild and recklessly have KING
26 AROGANT charged, arrested, falsely imprisoned, and wrongfully incarcerated.

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 JUDICIAL ABUSE OF PROCESS, 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, HED, & NEGLIGENT HED**

1
2 308. Defendant Cheryl Lynn Kaylor's May 2024 and June 2024 willful, knowing,
3 wanton, malicious, careless, reckless, and callous illegal acts and illegal actions of
4 conspiring with CDCR peace officers to recklessly violate KING AROGANT's
5 constitutional civil rights led to her being GUILTY herein of all the following under color
6 of law illegal acts:

- 7
8 1. The self-help eviction of Arogant Hollywood.
9 2. The self-help eviction of Alison Helen Fairchild.
10 3. Unconstitutional violations of Alison Helen Fairchild's Fourteenth Amendment
11 civil rights.
12 4. False arrest and false imprisonment of Arogant Hollywood beginning on July 11, 2024.
13 5. Fabricated lies and reports to CDCR peace officers that resulted in KING AROGANT
14 receiving a 130-day jail sentence for contacting Defendant Cheryl Lynn Kaylor.

15
16 309. Herein, Kaylor has not been and is not being sued for KING AROGANT's false arrest
17 and conviction. In this original constitutional civil rights Kaylor is only being sued for using
18 under color of law FRAUD and under color of law DECEIT to self-help evict KING
19 AROGANT from real property he owns located at 13732 Runnymede Street, Van Nuys, CA
20 91405.

21
22 310. On June 14, 2024, KING AROGANT was ordered to report to the CDCR adult parole
23 supervision office located at 971 Corporate Center Drive, Pomona, CA 91768. Upon arriving
24 KING AROGANT's was served a special adult parole supervision condition that required him
25 to immediately vacate his partially owned home located at 13732 Runnymede Street, Van Nuys,
26 CA 91405. The illegal and unconstitutional special parole conditions were wholly derived and

27 created based upon Defendant Cheryl Lynn Kaylor's reckless under color of law FRAUD and
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 JUDICIAL ABUSE OF PROCESS, 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
2 her reckless under color of law DECEIT in which she willfully, knowingly, carelessly,
3 wantonly, maliciously, recklessly, and callously made the following outlandish and outrageous
4 allegations that KING AROGANT had engaged in a course of criminal conduct with her in the
5 past:

- 6
- 7 1. That Arogant Hollywood had raped her in the past.
- 8 2. That Arogant Hollywood struck her with a closed fist and open hand in the past.
- 9 3. That Arogant Hollywood was verbally and emotionally abusive to her in the past.
- 10 4. That Arogant Hollywood had threatened to kill Cheryl Lynn Kaylor in the past.
- 11 5. That Arogant Hollywood stole money from her.
- 12 6. That Arogant Hollywood blocked her access to food in her house from her kitchen
13 cabinets, refrigerator, and freezer.
- 14 7. That Arogant Hollywood was committing acts of FRAUD to take Cheryl Lynn Kaylor's
15 house away from her by extorting through the courts and by extorting Kaylor through
16 the courts and the filing of lawsuits.
- 17 8. That Arogant Hollywood had stalked and followed Cheryl Lynn Kaylor in the past.
- 18 9. That Arogant Hollywood had harassed Cheryl Lynn Kaylor in the past.
- 19 10. That Arogant Hollywood often yelled and screamed profanities, vulgarities, and
20 obscenities to Cheryl Lynn Kaylor both over the telephone and in person.
- 21 11. That Arogant Hollywood made numerous criminal threats in the past that he
22 would kill members of Kaylor's family.

23
24 311. On June 14, 2024, KING AROGANT vacated and moved out of his partially owned
25 home located at 13732 Runnymede Street, Van Nuys, CA 91405, because three CDCR peace
26 officers (Jesse Ochoa and Tiffany Johnson) told KING AROGANT that if he did not vacate him

27 house in Van Nuys, he would be physically arrested and have his adult parole supervision
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 JUDICIAL ABUSE OF PROCESS, 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, &
NEGLIGENCE IIED**

1
2 revoked.

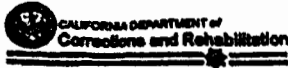
3
4 312. On June 15, 2024 even though Alison Helen Fairchild became a tenant before she even
5 had received her house keys. Defendant Kaylor once again showed and proved her hatred for
6 Alison Helen Fairchild when she called the city of Los Angeles police and requested that its
7 peace officers physically arrest Fairchild for trespassing at 13732 Runnymede Street, Van Nuys,
8 CA 91405. On June 15, 2024 Kaylor told Fairchild through city of Los Angeles peace officers
9 that Fairchild had twelve hours to vacate Kaylor's house or she would sign a private person's
10 arrest form and have Fairchild arrested for trespassing. This is to be alleged in a separate civil
11 rights complaint against Kaylor, as she committed reckless under color law FRAUD and
12 reckless under color law DECEIT by lying to city of Los Angeles peace officers that she never
13 gave Fairchild permission to live at her home, by failing to disclose to peace officers that
14 Fairchild's fiancé KING AROGANT was an owner of her house, failing to disclose that Kaylor
15 gave Fairchild permission to live with her, and by failing to disclose that in early May 2024 she
16 went to Home Depot and had keys made for Fairchild.

17
18 313. Because of Defendant Kaylor's reckless under color of FRAUD and reckless under color
19 of law DECEIT on June 15, 2024 city of Los Angeles peace officers told Fairchild that they
20 would return to 13732 Runnymede Street, Van Nuys, CA 91405, after 12 hours to physically
21 arrest Fairchild if she had not by that deadline vacated Kaylor's house. See now Exhibit ____ of
22 KING AROGANT's Verified Appendix of Exhibits that proves Kaylor conspired with CDCR
23 peace officers to willfully, knowingly, wantonly, maliciously, carelessly, recklessly, and
24 callously violate the United States Constitution and KING AROGANT's constitutional
25 civil rights, below and attached herein.

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 JUDICIAL ABUSE OF PROCESS, 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**

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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED



NOTICE AND CONDITIONS OF PAROLE

YOU ARE BEING RELEASED TO PAROLE SUPERVISION, EFFECTIVE: 06/17/2024, FOR A MAXIMUM PERIOD OF: Duration
YOU ARE SUBJECT TO THE FOLLOWING TERMS AND CONDITIONS OF RELEASE FROM PRISON:
 If you violate any of the conditions of your parole or violate any law, you may be subject to arrest and/or incarceration in a county jail or returned to state prison, pursuant to Penal Code (PC) Section 3000.1, or PC Section 3000, subdivision (b), paragraph (4), regardless of whether new charges are filed.
 You shall waive extradition to the State of California from any state or territory of the United States, or the District of Columbia. You shall not contest any effort to return you to the State of California.
 You, your residence, and any property under your control are subject to search or seizure by a probation officer, an agent or officer of the California Department of Corrections and Rehabilitation, or any other peace officer, at any time of the day or night, with or without a search warrant, with or without cause.
 If another jurisdiction has lodged a detainer against you, you may be released to the custody of that jurisdiction. Should you be released from their custody prior to the expiration of your California parole, or should the detainer not be exercised, you are to immediately contact the nearest office of the Department of Corrections and Rehabilitation, Division of Adult Parole Operations, for instructions on reporting to a parole agent.
 The procedure for obtaining a Certificate of Rehabilitation is documented in PC Sections 4852.01-4852.21.

CONDITIONS OF PAROLE

1. **SPECIAL CONDITIONS:** Special conditions of parole may be mandated by law or may be imposed at the discretion of your agent. Special conditions of parole that forbid conduct which is not itself criminal, must reasonably relate to a crime for which you were convicted, or must be reasonably related to deterring future criminality. You are subject to the following special conditions of parole:
SEE CDCR FORM: SPECIAL CONDITIONS OF PAROLE

I ACKNOWLEDGE MY SPECIAL CONDITIONS OF PAROLE:	SIGNATURE OF UNIT SUPERVISOR	DATE SIGNED
	J. Uchoa	06/14/2024

Inmate/Parolee Initials:

- RELEASE, REPORTING, RESIDENCE AND TRAVEL:** Unless other arrangements are approved in writing, you shall report to your parole agent on the first working day following your release. The name, address, and telephone number of the parole agent responsible for your parole supervision shall be documented on the CDCR Form 611 (Rev. 08, 2013) Release Program Study, which is incorporated by reference as part of this Notice. You shall inform your supervising parole agent of your residence, employment, education, and/or training. Any change or anticipated change to your residence shall be reported to your parole agent in advance. You shall inform your parole agent within 72 hours of any change to your employment location, employer, or termination of employment.
- PAROLE AGENT INSTRUCTIONS AND TRAVEL:** You shall comply with all of the instructions from your parole agent. You shall not travel more than 50 miles from your residence without the prior approval of your parole agent. You shall not be absent from your county of residence for a period of more than 48 hours. You shall not leave the State of California without prior written approval of your parole agent.
- CRIMINAL CONDUCT:** You shall not engage in conduct prohibited by law (state, federal, county, or municipal). You shall immediately inform your parole agent if you are arrested for any felony or misdemeanor crime. Be advised, your conduct, if prohibited by law, may result in parole revocation with or without a criminal conviction.
- WEAPONS:** You shall not own, use, have access to, or have under your control: (a) any type of firearm, instrument, or device which a reasonable person would believe to be capable of being used as a firearm, or any ammunition which could be used in a firearm; (b) any weapon as defined in state or federal statutes, or any instrument or device which a reasonable person would believe to be capable of being used as a weapon; (c) any knife with a blade longer than two inches, except kitchen knives which must be kept only in the kitchen of your residence, and knives related to your employment, which may be used and carried only in connection with your employment; or (d) a crossbow of any kind.
- THIS DOCUMENT SERVES AS YOUR NOTICE AND CONDITIONS OF PAROLE.** You have the right to grieve the special conditions of your parole. Special conditions imposed by the Division of Adult Parole Operations may be grieved pursuant to California Code of Regulations (CCR), Title 15, Sections 3480-3486.

I have read or have had read to me and understand the conditions of parole as they apply to me.

CDC NUMBER	INMATE/PAROLEE NAME	INMATE/PAROLEE SIGNATURE	DATE SIGNED
BX1748	HOLLYWOOD, ARROGANT		

THIS SECTION TO BE COMPLETED BY CDCR STAFF ONLY

Does the inmate/parolee have a qualifying disability requiring effective communication? _____

If yes, cite the source document and/or observations: _____

What type of accommodation assistance was provided to achieve effective communication to the best of the inmate's/parolee's ability? _____

STAFF NAME (Print or Type)	STAFF SIGNATURE	DATE SIGNED

CDCR FORM PPST120 - Notice and Conditions of Parole
 Rev 07/21

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 JUDICIAL ABUSE OF PROCESS, 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



SPECIAL CONDITIONS OF PAROLE

PAROLEE NAME: HOLLYWOOD, ARROGANT

CDC NUMBER: BX1748

DATE: 06/14/2024

You shall comply with all of the following special conditions while you are on parole. Any exceptions must be approved in writing by the Unit Supervisor.

COURT IMPOSED	REASON
<input checked="" type="checkbox"/> 001. You shall abide by any court-imposed Special Conditions of Parole.	08

TREATMENT	REASON
<input checked="" type="checkbox"/> 006. You shall participate in a mental health treatment program as directed by your parole agent.	07

VICTIM(S)	REASON
<input checked="" type="checkbox"/> 014. You shall not contact or attempt to contact your crime victims or Los Angeles County Court Cases GA114055, 21PD001479, or their immediate families. "No contact" means no contact in any form, whether direct or indirect, personally, by telephone, in writing, electronic media, computer, or through another person, etc. and includes unnecessarily traveling past, or loitering near where you know or should reasonably know your victim(s) frequents, resides, is employed, or attends classes.	04
<input checked="" type="checkbox"/> 015. You shall not threaten, stalk, abuse, harass, or commit further violent acts against the victim(s).	04
<input checked="" type="checkbox"/> 016. You shall not possess any of your victims Los Angeles County Court Cases GA114055, 21PD001479 personal effects (e.g., pictures, letters, etc.). You shall not possess or view certain materials related to or part of your identified behaviors that lead to your criminal history for your crime (e.g., stories, images related to your crime or similar crimes, images which depict individuals similar to your victims).	04

COURT-ORDERED OR CDCR-MANDATED PROGRAMS	REASON
<input checked="" type="checkbox"/> 044. You shall enroll in and successfully complete an Anger Management Program. Enrollment shall occur within 30 days from the date of release or 30 days from the signature of these conditions.	04

OTHER	REASON
<input checked="" type="checkbox"/> 065. If your residential status becomes transient, you shall report to the parole office every Tuesday at 1200 hours.	08
<input checked="" type="checkbox"/> 066. You shall abide by any Restraining orders provided by the court.	08
<input checked="" type="checkbox"/> 067. You shall not contact or attempt to contact Cristhofer Cecenus, Humangood Affordable Housing, and any employees of Humangood Affordable Housing. "No contact" means no contact in any form, whether direct or indirect, personally, by telephone, in writing, electronic media, computer, or through another person, etc. and includes unnecessarily traveling past, or loitering	08

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 JUDICIAL ABUSE OF PROCESS, 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

	near where you know or should reasonably know your victim(s) frequents, resides, is employed, or attends classes.	
068.	You shall not threaten, stalk, abuse, harass, or commit further violent acts against Humangood Affordable Housing, and Cristofer Cecenus.	08
069.	Other information: You shall not possess any of Cristhofer Cecenus, Humangood Affordable Housing, and any employees of Humangood Affordable Housing personal effects (e.g., pictures, letters, etc.). You shall not possess or view certain materials related to or part of your identified behaviors that lead to your criminal history for your crime (e.g., stories, images related to your crime or similar crimes, images which depict individuals similar to Cristhofer Cecenus, Humangood Affordable Housing, and any employees of Humangood Affordable Housing.	08
	You shall not contact or attempt to contact Spencer Fane LLP employee's B. Madison, J. Bielat, J. Moeller, S. Wheeling, M. Exceen, C. Godfrey, M. Jackson, J. Johnson, J. Pearson, L. Austin, H. Davis, K. McCay, E. McCay, M. Aying, L. Greathouse, H. Lee, S. Breeding, J. Zambrano, N. Natesky, C. Alston, K. Sapulo, J. Dooley, H. Simvoulakis - Panos, P. Whalen, G. Sotelo, C. Robertson, S. Shapiro, S. Shah, E. Stephenson, S. Makino, J. Vander Weele . "No contact" means no contact in any form, whether direct or indirect, personally, by telephone, in writing, electronic media, computer, or through another person, etc. and includes unnecessarily traveling past, or loitering near where you know or should reasonably know your victim(s) frequents, resides, is employed, or attends classes. When needing to contact Spencer Fane LLP you shall contact : Ms. Theresa Becerra and Mr. Ernesto J. Prado.	08
071.	You shall not threaten, stalk, abuse, harass, or commit further violent acts against Spencer Fane LLP employee's B. Madison, J. Bielat, J. Moeller, S. Wheeling, M. Exceen, C. Godfrey, M. Jackson, J. Johnson, J. Pearson, L. Austin, H. Davis, K. McCay, E. McCay, M. Aying, L. Greathouse, H. Lee, S. Breeding, J. Zambrano, N. Natesky, C. Alston, K. Sapulo, J. Dooley, H. Simvoulakis - Panos, P. Whalen, G. Sotelo, C. Robertson, S. Shapiro, S. Shah, E. Stephenson, S. Makino, J. Vander Weele.	08
072.	You shall not possess any of Spencer Fane LLP employee's B. Madison, J. Bielat, J. Moeller, S. Wheeling, M. Exceen, C. Godfrey, M. Jackson, J. Johnson, J. Pearson, L. Austin, H. Davis, K. McCay, E. McCay, M. Aying, L. Greathouse, H. Lee, S. Breeding, J. Zambrano, N. Natesky, C. Alston, K. Sapulo, J. Dooley, H. Simvoulakis - Panos, P. Whalen, G. Sotelo, C. Robertson, S. Shapiro, S. Shah, E. Stephenson, S. Makino, J. Vander Weele personal effects (e.g., pictures, letters, etc.). You shall not possess or view certain materials related to or part of your identified behaviors that lead to your criminal history for your crime (e.g., stories, images related to your crime or similar crimes, images which depict individuals similar to your victim[s]).	08
073.	You shall not contact or attempt to contact Cheryl Lynn Kaylor or their immediate families. "No contact" means no contact in any form whether direct or indirect, personally, by telephone, in writing, electronic media, computer, or through another person, etc. and includes unnecessarily traveling past, or loitering near where you know or should reasonably know your victim(s) frequents, resides, is employed, or attends classes.	14

REASONS FOR SPECIAL CONDITIONS OF PAROLE


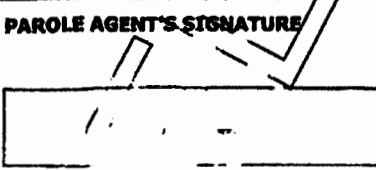

Special conditions can be imposed if there is a nexus or the conditions reasonably related to the subject's commitment offense, criminal conduct, and/or future criminality. A special condition that bars lawful activity is valid only if the prohibited conduct either:

1. Has a relationship to the crime of which the offender was convicted.
2. Is reasonably related to deter future criminality.

Conditions may regulate conduct that is not in itself criminal, but rather reasonably related to future criminality by regulating or prohibiting non-criminal conduct.

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 JUDICIAL ABUSE OF PROCESS, 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

REASON CODES	DESCRIPTION
04	04. Based on the nature of the commitment offense(s), a nexus exists between the behavior displayed during the course of committing their prior crime(s) and the behavior that is being restricted by imposing this condition. The nature of the committed offense is described as: Violent.
07	07. Behavioral Health Reintegration pursuant to Penal Code 3002, Division of Adult Parole Operations policy, and/or a documented history of psychiatric/psychological illness and/or related symptoms.
08	08. Based on behavior displayed by offenders convicted of similar crimes, or displaying similar criminal behavior, imposition of this condition may regulate conduct that is not in itself criminal, but rather reasonably related to future criminality.
14	14. BPH, DAPO, or court-imposed special condition(s): Letter received from Owner Chery Lynn Kaylor

PAROLEE'S NAME (LAST, FIRST, M.I.) HOLLYWOOD, ARROGANT	PAROLEE'S SIGNATURE 	CDC NUMBER BX1748	DATE SIGNED
PAROLE AGENT'S NAME	PAROLE AGENT'S SIGNATURE 	BADGE NO.	DATE SIGNED
UNIT SUPERVISOR'S NAME J. Ochoa	UNIT SUPERVISOR'S SIGNATURE 	BADGE NO. 5639	DATE SIGNED 06/14/2024

CDCR SOMS PPST121 - Special Conditions of Parole
Rev 07/21



U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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

1 314. On June 17, 2024, CDCR Assistant Unit Supervisor Jesse Ochoa received a text message
2 from Cheryl Kaylor advising that KING AROGANT was at his partially owned residence on
3 June 16, 2024. See now CDCR's parole violation report attached as Exhibit _____ of KING
4 AROGANT's Verified Appendix of Exhibits, and also below.
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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

STATE OF CALIFORNIA
 PAROLE VIOLATION REPORT
 CDCR 1676 (REV. 04/23)

DEPARTMENT OF CORRECTIONS AND REHABILITATION
 DIVISION OF ADULT PAROLE OPERATIONS
 Page 3 of 7

ATTACHMENT 2
 PVDTS #: 1154855

CDCR	PAROLEE NAME (LAST, FIRST, MI)	PAROLE UNIT	REGION	AGENT OF RECORD
BX1748	HOLLYWOOD, ARROGANT	SAN GAB VAL 1	S	CORTEZ, FERNANDO

of Corrections and Rehabilitation (CDCR) 1515 Special Conditions of Parole (SCOP). Hollywood is in violation of condition #073 which states: You shall not contact or attempt to contact Cheryl Lynn Kaylor or their immediate families. "No contact" means no contact in any form, whether direct or indirect, personally, by telephone, in writing, electronic media, computer, or through another person, etc. and includes unnecessarily travelling past, or loitering near where you know or should reasonably know your victim(s) frequents, resides, is employed, or attends classes.

On 06/17/2024, Assistant Unit Supervisor (AUS) J. Ochoa received a text message from Cheryl Kaylor advising that Hollywood was at her residence on 06/16/24. However, Hollywood left the residence prior to the Police arriving. AUS J. Ochoa called Kaylor advised her she might want to change the locks on her residence. Cheryl Kaylor, further stated, Hollywood moved out of the residence on Friday 06/14/2024.

06/17/2024, Agent Cortez made several attempts to contact Hollywood by calling him on his cellphone (323-240-0643). The results were negative Hollywood's cellphone went straight to voicemail. Agent Cortez was unable to leave voice messages due to his voicemail box not being set up. Agent Cortez left a text message that stated, " You shall report to the San Gabriel Valley Parole Office located at 971 Corporate Center Drive, Pomona, California 91768. Hollywood was to report on 06/18/2024 at 0800 hours. Agent Cortez attempted to contact Hollywood by calling his girlfriend Allison Fairchild's cellphone Allison answered the phone and stated, " I'm not with Hollywood at the moment." Agent Cortez left a message for Hollywood to report to the San Gabriel Valley Parole Office located at 971 Corporate Center Drive, Pomona, California 91768 on 06/18/2024 at 0800 hours. Allison stated, " I will let him know."

On 06/18/2024, Agent Cortez exhausted all efforts in locating Hollywood and submitted a CR301 warrant and order request to the Los Angeles County Superior Court for his arrest.

On 06/18/2024, the Honorable Judicial Officer Jeffrey S. Cohen-Laurie signed and issued Los Angeles County Warrant # 24CAPH02364.

On 06/20/2024, Agent Cortez received an email from Cheryl Kaylor which stated, " On 06/19/2024, Arrogant knocked on my bedroom window then went to my front door and shoved a bunch of papers through the mail slot. He was here from about 1220 pm to 1223 pm. He captured on camera that his key didn't work. Arrogant stated, "You have been served. I'm also serving your family Chapman. You're on camera. Call the police. I'll be gone by the time they get here. If you do anything with my property, you'll be sued. You have no right to lock me out." None of the paperwork had the name Chapman on it. He left another full copy of the original suit (identical to the one I received from the process server) and the following additional docs." Cheryl also provided a photo of Hollywood at the residence.

On 07/11/2024, Hollywood was arrested by the Riverside Police Department for Los Angeles

DISTRIBUTION: COPY TO PAROLE AUTHORITY COPY TO DISTRICT ATTORNEY COPY TO DEFENSE ATTORNEY COPY RETAINED IN FIELD FILE

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 JUDICIAL ABUSE OF PROCESS, 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, HIED, & NEGLIGENT HIED

1 315. Here and above Kaylor is reporting KING AROGANT for simply returning to his home
2 owned real property to retrieve his property so he did not lose his freedom for refusing to leave
3 his own home located at 13732 Runnymede Street, CA 91405!

4
5 316. State of California, Department of Corrections and Rehabilitation, Division of Adult
6 Parole Operations, peace officer Fernando Cortez documented the following on page 3 of 7 of
7 his parole violation report of KING AROGANT:

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9 On 06/20/2024, Agent Cortez received an email from Cheryl Lynn Kaylor which stated:

10
11 ***“ On 6/19/2024, Arogant knocked on my bedroom window then went to my front door***
12 ***and shoved papers through the mail slot. He was here from about 1220 pm to 1223 pm.***
13 ***He captured on camera that his key didn’t work. Arrogant stated, “You have been***
14 ***served. I’m also serving your family Chapman. You’re on camera. Call the police. I’ll***
15 ***be gone by the time they get here. If you do anything with my property, you’ll be sued.***
16 ***You have no right to lock me out.” None of the paperwork had the name Chapman on***
17 ***it. He left another full copy of the original suit (identical to the one I received from the***
18 ***process server) and the following additional docs.” Cheryl also provided a photo of***
19 ***Hollywood at the residence.”***

20
21 See now CDCR parole report completed by California peace officer Fernando Cortez in June
22 2024, attached as Exhibit ___ of KING AROGANT’s Verified Appendix of Exhibits, and also
23 below.

24
25
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 JUDICIAL ABUSE OF PROCESS, 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**

STATE OF CALIFORNIA
 PAROLE VIOLATION REPORT
 CDCR 1678 (REV. 04/22)

DEPARTMENT OF CORRECTIONS AND REHABILITATION
 DIVISION OF ADULT PAROLE OPERATIONS
 Page 3 of 7

ATTACHMENT 2
 PVDTS #: 1154855

CDC #	PAROLEE NAME (LAST, FIRST, MI)	PAROLE UNIT	REGION	AGENT OF RECORD
8X1748	HOLLYWOOD, ARROGANT	SAN GAB VAL 1	S	CORTEZ, FERNANDO

of Corrections and Rehabilitation (CDCR) 1515 Special Conditions of Parole (SCOP). Hollywood is in violation of condition #073 which states: You shall not contact or attempt to contact Cheryl Lynn Kaylor or their immediate families. "No contact" means no contact in any form, whether direct or indirect, personally, by telephone, in writing, electronic media, computer, or through another person, etc. and includes unnecessarily travelling past, or loitering near where you know or should reasonably know your victim(s) frequents, resides, is employed, or attends classes.

On 06/17/2024, Assistant Unit Supervisor (AUS) J. Ochoa received a text message from Cheryl Kaylor advising that Hollywood was at her residence on 06/16/24. However, Hollywood left the residence prior to the Police arriving. AUS J. Ochoa called Kaylor advised her she might want to change the locks on her residence. Cheryl Kaylor, further stated, Hollywood moved out of the residence on Friday 06/14/2024.

06/17/2024, Agent Cortez made several attempts to contact Hollywood by calling him on his cellphone (323-240-0643). The results were negative Hollywood's cellphone went straight to voicemail. Agent Cortez was unable to leave voice messages due to his voicemail box not being set up. Agent Cortez left a text message that stated, "You shall report to the San Gabriel Valley Parole Office located at 971 Corporate Center Drive, Pomona, California 91768. Hollywood was to report on 06/18/2024 at 0800 hours. Agent Cortez attempted to contact Hollywood by calling his girlfriend Alison Fairchild's cellphone Alison answered the phone and stated, "I'm not with Hollywood at the moment." Agent Cortez left a message for Hollywood to report to the San Gabriel Valley Parole Office located at 971 Corporate Center Drive, Pomona, California 91768 on 06/18/2024 at 0800 hours. Alison stated, "I will let him know."

On 06/18/2024, Agent Cortez exhausted all efforts in locating Hollywood and submitted a CR301 warrant and order request to the Los Angeles County Superior Court for his arrest.

On 06/18/2024, the Honorable Judicial Officer Jeffrey S. Cohen-Laurie signed and issued Los Angeles County Warrant # 24LAPH03364.

On 06/20/2024, Agent Cortez received an email from Cheryl Kaylor which stated, "On 06/19/2024, Arrogant knocked on my bedroom window then went to my front door and shoved a bunch of papers through the mail slot. He was here from about 1220 pm to 1223 pm. He captured on camera that his key didn't work. Arrogant stated, "You have been served. I'm also serving your family Chapman. You're on camera. Call the police. I'll be gone by the time they get here. If you do anything with my property, you'll be sued. You have no right to lock me out." None of the paperwork had the name Chapman on it. He left another full copy of the original suit (identical to the one I received from the process server) and the following additional docs." Cheryl also provided a photo of Hollywood at the residence.

On 07/11/2024, Hollywood was arrested by the Riverside Police Department for Los Angeles

DISTRIBUTION: COPY TO PAROLE AUTHORITY COPY TO DISTRICT ATTORNEY COPY TO DEFENSE ATTORNEY COPY RETAINED IN FIELD FILE

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

1 317. Pursuant to Federal Rules of Evidence, Rule 201, this United States District Court should
2 take judicial notice of the provided pages of CDCR's parole violation report and also CDCR's
3 special conditions imposed upon KING AROGANT by CDCR in June 2024.

4
5 318. Here and above Kaylor is reporting to get KING AROGANT in trouble for serving legal
6 documents upon her. CDCR's parole violation report makes it easy to see that Kaylor is guilty
7 of conspiring with CDCR peace officers Jesse Ochoa and Tiffany Johnson, and also CDCR
8 Defendants Jeffrey D. Macomber. Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
9 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, and DOES 1-10 to willfully,
10 knowingly, wantonly, maliciously, wantonly, carelessly, and callously violate KING
11 AROGANT's constitutional civil rights.

12
13 319. Here and above Kaylor is reporting to get KING AROGANT in trouble for serving legal
14 documents upon her. CDCR's parole violation report makes it easy to see that Kaylor is guilty
15 of conspiring with CDCR peace officers Jesse Ochoa and Tiffany Johnson, and also CDCR
16 Defendants Jeffrey D. Macomber. Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
17 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, and DOES 1-10 to willfully,
18 knowingly, wantonly, maliciously, wantonly, carelessly, and callously commit reckless under
19 color of law fraud, and Defendant Kaylor is thus guilty of reckless under color of law FRAUD.

20
21 320. Here and above Kaylor is reporting to get KING AROGANT in trouble for serving legal
22 documents upon her. CDCR's parole violation report makes it easy to see that Kaylor is guilty
23 of conspiring with CDCR peace officers Jesse Ochoa and Tiffany Johnson, and also CDCR
24 Defendants Jeffrey D. Macomber. Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
25 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, and DOES 1-10 to willfully,
26 knowingly, wantonly, maliciously, wantonly, carelessly, and callously commit reckless under

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 JUDICIAL ABUSE OF PROCESS, 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 color of law DECEIT, and Defendant Kaylor is thus guilty of reckless under color of law
2 DECEIT.

3
4 321. Here and above Kaylor is reporting to get KING AROGANT in trouble for serving legal
5 documents upon her. CDCR's parole violation report makes it easy to see that Kaylor is guilty
6 of conspiring with CDCR peace officers Jesse Ochoa and Tiffany Johnson, and also CDCR
7 Defendants Jeffrey D. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
8 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, and DOES 1-10 to willfully,
9 knowingly, wantonly, maliciously, wantonly, carelessly, and callously commit reckless under
10 color of law SELF-HELP EVICTION, and Defendant Kaylor is thus guilty of reckless under
11 color of law SELF-HELP EVICTION.

12
13 322. Throughout KING AROGANT and Cheryl Lynn Kaylor's entire relationship and
14 friendship from November 2017 until everything ceased in early May 2024. Kaylor had never
15 called the police on KING AROGANT, never applied for a restraining order against KING
16 AROGANT, and never accused KING AROGANT of doing anything wrong, never accused
17 KING AROGANT of doing anything illegal to her, and Kaylor had never accused KING
18 AROGANT of ever engaging in a criminal or unlawful course of conduct with her. This proves
19 by clear and convincing that all of Kaylor's outrageous, outlandish, and very serious allegations
20 made against KING AROGANT, and then recklessly told to County of Los Angeles Adult
21 Protective Services employees and CDCR peace officers between late May 2024 and mid-June
22 2024, were absolutely 100% FALSE.

23
24 323. On or about April 20, 2024, KING AROGANT played the on or about October 22,
25 2023, audio recording call between RACIST SANCHEZ and KING AROGANT for
26 Defendant Cheryl Lynn Kaylor. Defendant Kaylor told KING AROGANT that she did

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 not hear him make any criminal threats on the audio recording, and she stated the
2 following verbatim ***“I am very sorry that you had to go to prison for doing nothing***
3 ***wrong.***” Defendant Cheryl Lynn Kaylor’s acknowledgment and opinion that KING
4 AROGANT was wrongfully sent to state prison proves by clear and convincing evidence
5 that she is a proper Defendant before this United States district court.

6
7 324. On or about April 20, 2024, Defendant Kaylor heard RACIST and LYING expert witness
8 Thomas Leo Guzman-Sanchez say the following to KING AROGANT on an October 2023
9 recorded call: “That’s a threat and now I’m going to report you.” Kaylor, therefore, knew that
10 KING AROGANT was wrongfully sent to prison and wrongfully placed on felony parole
11 supervision. Yet, Defendant Cheryl Lynn Kaylor recklessly took advantage of KING
12 AROGANT ‘s wrongful felony prison sentence by conspiring with CDCR peace officers and
13 CDCR employees sued herein who were responsible for KING AROGANT’s illegal and
14 unconstitutional felony parole supervision to willfully, knowingly, carelessly, wantonly,
15 maliciously, recklessly, and callously violated the United States Constitution and KING
16 AROGANT’s United States Fourteenth Amendment Due Process Clause constitutional civil
17 rights.

18
19 325. In mid to late May 2024 in furtherance to Kaylor and CDCR’s conspiracy to willfully,
20 knowingly, maliciously, wantonly, carelessly, and callously violate and interfere with KING
21 AROGANT’s United States Fourteenth Amendment Due Process Clause constitutional civil
22 rights after a female CDCR peace officer drive to Kaylor’s home and had a secret meeting with
23 Kaylor. At this secret meeting outside of the knowledge and presence of KING AROGANT,
24 Kaylor told this female CDCR peace officer that she was in the process of evicting KING
25 AROGANT. At the time of KING AROGANT’s forced vacate on June 14, 2024 KING
26 AROGANT had never been served any type of 30 or 60 day notice to vacate his partially

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 JUDICIAL ABUSE OF PROCESS, 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

1 owned home located at 13732 Runnymede Street, Van Nuys, CA 91405, nor were there any
2 eviction papers filed against KING AROGANT. Thus, Kaylor committed reckless under color
3 of law FRAUD by lying to, misrepresenting to, misleading, and fabricating lies so CDCR peace
4 officers and Defendants CDCR peace officers Jesse Ochoa and Tiffany Johnson, and also CDCR
5 Defendants Jeffrey D. Macomber. Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
6 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, and DOES 1-10 would
7 foolishly and recklessly aid and assist with Kaylor's secretly planned and conspired under color
8 of self-help eviction of KING AROGANT's 30% owned house. Kaylor's reckless under color of
9 law FRAUD was done for the unlawful purposes of violating the United States Constitution,
10 KING AROGANT's United States Fourteenth Amendment Due Process Clause constitutional
11 civil rights, and illegally dispossessing KING AROGANT by using illusory and manipulated
12 illegal acts of conspiracies, concealment, deceit, deception, fraud, and corruption to gain an
13 unfair, unjust, unconstitutional, illegal, and unlawful advantage over KING AROGANT.
14 Moreover, Kaylor's secret meeting with the CDCR Van Nuys female peace officer proves by
15 clear and convincing that she misrepresented to, lied to, and fabricated lies to CDCR peace
16 officers and County of Los Angeles Adult Protective Services social workers in late May 2024
17 and early June 2024 that KING AROGANT had:

- 18
- 19 1. That Aroant Hollywood had raped her in the past.
- 20 2. That Arogant Hollywood struck her with a closed fist and open hand in the past.
- 21 3. That Arogant Hollywood was verbally and emotionally abusive to her in the past.
- 22 4. That Arogant Hollywood had threatened to kill Cheryl Lynn Kaylor in the past.
- 23 5. That Arogant Hollywood stole money from her.
- 24 6. That Arogant Hollywood blocked her access to food in her house from her kitchen
25 cabinets, refrigerator, and freezer.
- 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 JUDICIAL ABUSE OF PROCESS, 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 7. That Arogant Hollywood was committing acts of FRAUD to take Cheryl Lynn Kaylor's
2 house away from her by extorting through the courts and by extorting Kaylor through
3 the courts and the filing of lawsuits.

4 8. That Arogant Hollywood had stalked and followed Cheryl Lynn Kaylor in the past.

5 9. That Arogant Hollywood had harassed Cheryl Lynn Kaylor in the past.

6 10. That Arogant Hollywood often yelled and screamed profanities, vulgarities, and
7 obscenities to Cheryl Lynn Kaylor both over the telephone and in person.

8 11. That Arogant Hollywood made numerous criminal threats in the past that he
9 would kill members of Kaylor's family.

10
11 Which was reckless under color of law FRAUD done by Kaylor for the unlawful purpose of
12 tricking, fooling, manipulating, and deceiving CDCR peace officers to aid and assist with her
13 secretly planned and conspired under color of law SELF-HELP EVICTION; which was done by
14 Defendant Kaylor using, employing, manipulating, and otherwise engaging in illusory and
15 manipulated illegal acts of conspiracies, deception, concealment, deceit, fraud, and corruption to
16 unlawful gain KING AROGANT's 30% owned real property by illegal dispossessing him
17 without due process of law. While during Kaylor's secret meeting with Van Nuys, California
18 female CDCR peace officer in mid or late May 2024, Kaylor did not accuse KING AROGANT
19 of any unlawful or illegal conduct with her. Kaylor just simply stated that she was in the process
20 of evicting KING AROGANT (which was a BOLD FACE LIE). Just one and two weeks later,
21 all occurring after Kaylor had met secretly with a Van Nuys female CDCR peace officer in May
22 2024, Kaylor was all of a sudden making outlandish, ridiculous, outrageous, serious, and violent
23 criminal allegations against KING AROGANT, and these ridiculous criminal allegations Kaylor
24 told to a male County of Los Angeles Adult Protective Services social worker so that they
25 would foolishly aid and assist with Kaylor's under color of law illegal dispossession of KING
26 AROGANT's partially owned real property located at 13732 Runnymede Street, Van Nuys,

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 JUDICIAL ABUSE OF PROCESS, 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 CA 91405.

2
3 326. KING AROGANT's CDCR special conditions of his illegal and unconstitutional felony
4 parole supervision state the following:

5
6 **BPH, DAPO, or court-imposed special condition (s):**

7 **Letter received from Owner Cheryl Lynn Kaylor.**

8
9 See now KING AROGANT's special CDCR parole conditions imposed entirely based upon ghe
10 willful, knowing, careless, wanton, malicious, reckless, and callous under color of law FRAUD
11 and DECEIT by Defendant Kaylor attached as Exhibit ____ of KING AROGANT's Verified
12 Appendix of Exhibits, and also below:

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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 JUDICIAL ABUSE OF PROCESS, 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, HED, & NEGLIGENT HED**

REASON CODE	DESCRIPTION
04	04. Based on the nature of the commitment offense(s), a nexus exists between the behavior displayed during the course of committing their prior crime(s) and the behavior that is being restricted by imposing this condition. The nature of the committed offense is described as: Violent.
07	07. Behavioral Health Reintegration pursuant to Penal Code 3002, Division of Adult Parole Operations policy, and/or a documented history of psychiatric/psychological illness and/or related symptoms.
08	08. Based on behavior displayed by offenders convicted of similar crimes, or displaying similar criminal behavior, imposition of this condition may regulate conduct that is not in itself criminal, but rather reasonably related to future criminality.
14	14. SPH, DAPO, or court-imposed special condition(s): Letter received from Owner Cheryl Lynn Kaylor

PAROLEE'S NAME (LAST, FIRST, M.I.) HOLLYWOOD, AROGANT	PAROLEE'S SIGNATURE 	CDC NUMBER BX1748	DATE SIGNED
PAROLE AGENT'S NAME	PAROLE AGENT'S SIGNATURE 	BADGE NO.	DATE SIGNED
UNIT SUPERVISOR'S NAME J. Ochoa	UNIT SUPERVISOR'S SIGNATURE 	BADGE NO. 5639	DATE SIGNED 06/14/2024

CDCA FORM #92121 - Special Conditions of Parole
Rev 07/21

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 JUDICIAL ABUSE OF PROCESS, 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

1 327. CDCR peace officer parole supervisor has told KING AROGANT that he could not
2 release a copy of Kaylor's victim letter to CDCR based upon the seriousness of the criminal
3 allegations she is making in her letter against KING AROGANT. On information and belief
4 Defendant Cheryl Lynn Kaylor committed willful, knowing, reckless, wanton, malicious,
5 careless, and callous under color law FRAUD and under color of law DECEIT by alleging all
6 the following outlandish, outrageous, and ridiculous criminal allegations against KING
7 AROGANT in her undisclosed and in secrecy sent June 2024 victim letter to CDCR:

- 8
- 9 1. That Aroant Hollywood had raped her in the past.
- 10 2. That Arogant Hollywood struck her with a closed fist and open hand in the past.
- 11 3. That Arogant Hollywood was verbally and emotionally abusive to her in the past.
- 12 4. That Arogant Hollywood had threatened to kill Cheryl Lynn Kaylor in the past.
- 13 5. That Arogant Hollywood stole money from her.
- 14 6. That Arogant Hollywood blocked her access to food in her house from her kitchen
15 cabinets, refrigerator, and freezer.
- 16 7. That Arogant Hollywood was committing acts of FRAUD to take Cheryl Lynn Kaylor's
17 house away from her by extorting through the courts and by extorting Kaylor through
18 the courts and the filing of lawsuits.
- 19 8. That Arogant Hollywood had stalked and followed Cheryl Lynn Kaylor in the past.
- 20 9. That Arogant Hollywood had harassed Cheryl Lynn Kaylor in the past.
- 21 10. That Arogant Hollywood often yelled and screamed profanities, vulgarities, and
22 obscenities to Cheryl Lynn Kaylor both over the telephone and in person.
- 23 11. That Arogant Hollywood made numerous criminal threats in the past that he
24 would kill members of Kaylor's family.
- 25
- 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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 328. On information and belief Defendant Cheryl Lynn Kaylor willfully, knowingly,
2 recklessly, maliciously, wantonly, and carelessly conspired with CDCR peace officers
3 Jesse Ochoa, unnamed Van Nuys female peace officer, Tiffany Johnson, Jeffrey D.
4 Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers,
5 Ronald Broomfield, Jennifer Benavidez, and DOES 1-10 to recklessly violate the United States
6 Constitution, and recklessly interfere with and violate KING AROGANT's Fourteenth
7 Amendment Due Process Clause constitutional civil rights.

8
9 329. Cheryl Lynn Kaylor knew that she was committing reckless under color of LAW
10 FRAUD and reckless under color of law DECEIT by willfully, knowingly, wantonly,
11 maliciously, recklessly, and callously making the above stated outlandish, ridiculous, and
12 outrageous criminal and elder abuse allegations against KING AROGANT because:

- 13
- 14 1. Kaylor had never filed for a elder abuse or civil harassment restraining order against
15 Arogant Hollywood.
- 16 2. Prior to May 2024 Kaylor had never alleged that KING AROGANT had engaged in any
17 wrongdoing, criminal course of conduct, or elder abuse with and/or against Kaylor.
- 18 3. KING AROGANT contacted the police twice based on the harassing actions of Kaylor
19 and her male friend.
- 20 4. Kaylor's phony and bogus CDCR victim letter was created and submitted only after
21 Alison Helen Fairchild had sued her in 3:24-cv-03362.
- 22 5. Cheryl Lynn Kaylor willfully, knowingly, maliciously, wantonly, carelessly, and
23 callously concealed from, failed to disclose, hid from, and otherwise deceived CDCR
24 employees and peace officers by recklessly failing to tell and inform them that KING
25 AROGANT owned 30% of the real property located at 13732 Runnymede Street, Van
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 JUDICIAL ABUSE OF PROCESS, 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**

1 Nuys, CA 91405, and recklessly failing to disclose to CDCR employees and peace
2 peace officers that KING AROGANT was a signor on her mortgage.

3
4 330. In May 2024, Defendant Cheryl Lynn Kaylor knew that she was willfully, knowingly,
5 carelessly, wantonly, maliciously, and callously fabricating lies by telling a CDCR Van Nuys
6 female peace officer that she was in the process of evicting KING AROGANT while she knew
7 this was a lie as she had not at all started the process by providing KING AROGANT with a 30
8 or 60 day notice to vacate, and Kaylor knew she could not evict KING AROGANT because he
9 owned 30% of the real property located at 13732 Runnymede Street, Van Nuys, CA 91405 and
10 was also a written signor on Kaylor's mortgage.

11
12 **H. AXON ENTERPRISE, INC. DEFENDANTS BRYCE MILLER & ELIZABETH**
13 **BYERS COMMITTED RECKLESS UNDER COLOR OF LAW DECEIT,**
14 **RECEIVED FAIR NOTICE THAT THEY WERE BOTH RECKLESSLY**
15 **VIOLATING KING AROGANT'S CONSTITUTIONAL CIVIL RIGHTS, AND**
16 **AXON DEFENDANTS CONSPIRED WITH ALL EMAILED DEFENDANTS TO**
17 **RECKLESSLY VIOLATE KING AROGANT'S FOURTH & FOURTEENTH**
18 **AMENDMENT CONSTITUTIONAL CIVIL RIGHTS.**

19
20 331. Plaintiff KING AROGANT hereby restates, realleges, reiterates, reincorporates,
21 and incorporates by reference previous paragraphs 1-330 of this original civil rights
22 complaint.

23
24 332. On June 21, 2024, Defendant Elizabeth Byers (ebyers@axon.com) and Defendant Bryce
25 Miller (bmiller@axon.com) received an email from KING AROGANT that stated the following:
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 JUDICIAL ABUSE OF PROCESS, 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 MY NAME IS AROGANT HOLLYWOOD
2 MY BIRTHPLACE IS SEATTLE
3 MY DATE OF BIRTH IS 12/09/1978
4 MY SOCIAL SECURITY NUMBER IS 533-92-3047
5 MY CALIFORNIA STATE PAROLE AND CORRECTIONS NUMBER IS BX1748
6 THE FRIVOLOUS CRIMINAL CASE IS GA114055
7 THE SUPERIOR COURT IS AND WAS: STATE OF CALIFORNIA, LOS ANGELES COUNTY
8 SUPERIOR COURT, ALHAMBRA COURTHOUSE
9 THE AGENCY THAT FALSELY ARRESTED ME WAS THE COUNTY OF LOS ANGELES
10 SHERIFF'S DEPARTMENT, TEMPLE CITY POLICE STATION
11 THE LAW ENFORCEMENT AGENCY THAT FRAMED ME AND MALICIOUSLY
12 PROSECUTED ME WAS THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S
13 OFFICE.
14 THE LAW ENFORCEMENT ATTORNEYS INVOLVED WITH FRAMING ME AND
15 CONSPIRING TO VIOLATE MY CIVIL RIGHTS WERE BRIAN MARK ROSENBERG, VICTOR
16 MANUEL RODRIGUEZ, SHARON LEE WOO, GEORGE GASCON, RONALD MILLIARD
17 GELTZ, JANICE EVE JOHNSON, STEPHANIE PEARL MIRE, ROBERT BONTA, CINDY
18 PARK AND TOO MANY MORE TO NAME HERE.

19 THE LAW ENFORCEMENT PEACE OFFICERS AND ATTORNEYS MOST RESPONSIBLE
20 WITH TESTIFYING FALSELY IN SUPERIOR COURT AND PRESENTING FALSE
21 EVIDENCE THAT WAS TRANSFERRED ON, UPLOADED TO, DOWNLOADED FROM, A
22 SHARED ON AXON'S EVIDENCE.COM WERE BRIAN MARK ROSENBERG, VICTOR
23 MANUEL RODRIGUEZ, JANICE EVE JOHNSON, STEPHANIE PEAR MORE, CINDY PARK,
24 SHERIFF ROBERT LUNA, BILLY S. KHOUNTHAVONG, SERGEANT FLOREZ, JUAREZ,
25 THOMAS LEO GUZMAN-SANCHEZ, JOEL SIMEONE WYENN, AND LEO KA FONG LO.

26 THE ABOVE NAMED LAW ENFORCEMENT PEACE OFFICERS AND ATTORNEYS WERE
27 ALL RESPONSIBLE WITH WILLFULLY, RECKLESSLY, WANTONLY, MALICIOUSLY, AND
28 CALLOUSLY WITHHOLDING EXCULPATORY EVIDENCE, TAMPERING WITH
EXCULPATORY EVIDENCE, MANIPULATING EXCULPATORY EVIDENCE, PRESENTING
FALSE EVIDENCE TO A SUPERIOR COURT ON APRIL 4, 2023, APRIL 5, 2023, AND
FEBRUARY 2, 2024, AND CREATING FALSE EVIDENCE, ALL OF WHICH RESULTED IN
AROGANT HOLLYWOOD'S BEING INCARCERATED FOR NEARLY TEN MONTHS FOR A
VIOLENT AND SERIOUS FELONY HE NEVER COMMITTED.

THE ABOVE-NAMED LAW ENFORCEMENT AGENCIES' PEACE OFFICERS AND
ATTORNEYS USED AXON'S EVIDENCE.COM TO PRESENT FALSE EVIDENCE TO A
STATE OF CALIFORNIA, SUPERIOR COURT, SHARE FALSE EVIDENCE AND WITHHOLD
EXCULPATORY EVIDENCE, AND TO STORE FALSE EVIDENCE CREATED BY LOS
ANGELES COUNTY SHERIFF'S DEPARTMENT'S FRAUD AND CYBER CRIMES BUREAU
SOUTHERN CALIFORNIA HIGH TECH TASK

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 JUDICIAL ABUSE OF PROCESS, 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, HIED, & NEGLIGENT HIED

333. KING AROGANT's June 21, 2024 email to Defendant Elizabeth Byers, Defendant Bryce Miller, Axon Enterprise Inc., and DOES 1-10 gave them FAIR NOTICE that County of Los Angeles Sheriff's Department peace officers and County of Los Angeles District Attorney's Office rogue and dishonest prosecutors had willfully, knowingly, carelessly, wantonly, maliciously, and callously uploaded phony and bogus LASD-created GoPro video recordings GL010586 and GL010587 to Axon Enterprise's evidence.com for the unlawful purposes of FRAMING KING AROGANT and recklessly presenting false evidence to a criminal Superior Court of California.

334. In his detained email, KING AROGANT demanded that Axon employees and other emailed Axon employees do the following:

AXON MUST IMMEDIATELY TURN OVER ALL AUDIO AND VIDEO RECORDING EVIDENCE (INCLUDING 911 TAPES AND LASD BODYCAM FOOTAGE) THAT WAS UPLOADED, DOWNLOADED, SHARED, AND STORED BY COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE AND COUNTY OF LOS ANGELES SHERIFF'S DEPARTMENT ATTORNEYS, PEACE OFFICERS AND/OR CIVILIAN EMPLOYEES.

AXON INC.'S FAILURE TO IMMEDIATELY TURN OVER ALL AUDIO AND VIDEO RECORDINGS EVIDENCE UPLOADED, DOWNLOADED, SHARED, AND STORED BY COUNTY OF LOS ANGELES SHERIFF'S DEPARTMENT AND COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S OFFICE WILL RESULT IN IMMEDIATE CIVIL RIGHTS COMPLAINTS BEING LAUNCHED AGAINST DEBRA M. GARNREITER IN UNITED STATES CENTRAL DISTRICT OF CALIFORNIA COURTHOUSES.

335. As of November 20, 2024, Defendant Elizabeth Byers, Defendant Bryce Miller, Axon Enterprise Inc., and DOES 1-10 have all willfully, knowingly, recklessly, wantonly, maliciously, and callously failed to respond to and ignored KING AROGANT's June 21, 2024 email.

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 JUDICIAL ABUSE OF PROCESS, 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

1 336. As of November 20, 2024, Defendant Elizabeth Byers, Defendant Bryce Miller, Axon
2 Enterprise Inc., and DOES 1-10 have willfully, knowingly, recklessly, wantonly, maliciously,
3 and callously failed to turn over and disclose copies of phony and bogus LASD-created GoPro
4 video recordings GL010586 and GL010587 that were recklessly uploaded to Axon Enterprise
5 Inc.'s evidence.com by rogue and dishonest County of Los Angeles Sheriff's Department's
6 Fraud and Cyber Crimes Bureau's Southern California High Tech Task Force peace officers
7 between February 22, 2023, and March 31, 2023.

8
9 337. As of November 20, 2024, Defendant Elizabeth Byers, Defendant Bryce Miller, Axon
10 Enterprise Inc., and DOES 1-10 have all willfully, knowingly, recklessly, wantonly, carelessly,
11 maliciously, and callously violated KING AROGANT's United States Fourteenth Amendment
12 Due Process Clause constitutional civil rights under color of law by failing to turn over and
13 disclose copies of phony and bogus LASD-created GoPro video recordings GL010586 and
14 GL010587 that were recklessly uploaded to Axon Enterprise Inc.'s evidence.com by rogue and
15 dishonest County of Los Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's
16 Southern California High Tech Task Force peace officers between February 22, 2023, and
17 March 31, 2023.

18
19 338. As of November 20, 2024, Defendant Elizabeth Byers, Defendant Bryce Miller, Axon
20 Enterprise Inc., and DOES 1-10 have all willfully, knowingly, recklessly, wantonly,
21 maliciously, carelessly, and callously committed reckless under color of law DECEIT by
22 concealing from, hiding from, failing to disclose, failing to tell, and failing to otherwise inform
23 the Superior Court of California, County of Los Angeles, Alhambra Superior Court that they
24 were all in possession of or had immediate access to digital and/or electronic copies of phony
25 and bogus LASD-created GoPro video recordings GL010586 and GL010587 that were
26 recklessly uploaded to Axon Enterprise Inc.'s evidence.com by rogue and dishonest County 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 JUDICIAL ABUSE OF PROCESS, 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 Los Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's Southern California
2 High Tech Task Force peace officers between February 22, 2023, and March 31, 2023.

3
4 339. Between June 21, 2024, and July 7, 2024, Defendants Elizabeth Byers, Bryce Miller,
5 Axon Enterprise Inc., and DOES 1-10 have all willfully, knowingly, recklessly, wantonly,
6 maliciously, and callously committed reckless under color of law DECEIT by concealing from,
7 hiding from, failing to disclose, failing to tell, and failing to otherwise inform the Superior Court
8 of California, County of Los Angeles, Alhambra Superior Court that they were all in possession
9 of or had immediate access to digital and/or electronic copies of phony and bogus LASD-created
10 GoPro video recordings GL010586 and GL010587 that were recklessly uploaded to Axon
11 Enterprise Inc.'s evidence.com by rogue and dishonest County of Los Angeles Sheriff's
12 Department's Fraud and Cyber Crimes Bureau's Southern California High Tech Task Force
13 peace officers between February 22, 2023, and March 31, 2023 which led to the July 11, 2024 to
14 August 30, 2024 wrongful and illegal County of Los Angeles jail incarceration of KING
15 AROGANT. Had Defendants Elizabeth Byers, Bryce Miller, Axon Enterprise Inc., and DOES
16 1-10 provided KING AROGANT with copies of phony and bogus LASD-created GoPro video
17 recordings GL010586 and GL010587 immediately and promptly after they were requested to do
18 so, KING AROGANT's wrongful and illegal July 11, 2024 until August 30, 2024 County of
19 Los Angeles jail incarceration would have never occurred.

20
21 340. Thus, Defendants Elizabeth Byers, Bryce Miller, Axon Enterprise Inc., and DOES 1-
22 10's reckless under color of law DECEIT by concealing from, hiding from, failing to disclose,
23 failing to tell, and failing to otherwise inform the Superior Court of California, County of Los
24 Angeles, Alhambra Superior Court that they were all in possession of or had immediate access
25 to digital and/or electronic copies of phony and bogus LASD-created GoPro video recordings
26 GL010586 and GL010587 that were recklessly uploaded to Axon Enterprise Inc.'s

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 JUDICIAL ABUSE OF PROCESS, 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, HIED, & NEGLIGENT HIED**

1 evidence.com by rogue and dishonest County of Los Angeles Sheriff's Department's Fraud and
2 Cyber Crimes Bureau's Southern California High Tech Task Force peace officers between
3 February 22, 2023, and March 31, 2023, which led to the July 11, 2024, to August 30, 2024
4 wrongful and illegal County of Los Angeles jail incarceration of KING AROGANT, which
5 made them wholly responsible for KING AROGANT's liberty being taken away for fifty-one
6 (51) consecutive days because KING AROGANT's July 11, 2024, to August 30, 2024, wrongful
7 incarceration would have never occurred if Defendants Elizabeth Byers, Bryce Miller, Axon
8 Enterprise Inc., and DOES 1-10 had of promptly turned over and disclosed copies of phony and
9 bogus LASD-created GoPro video recordings GL010586 and GL010587 that were recklessly
10 uploaded to Axon Enterprise Inc.'s evidence.com by rogue and dishonest County of Los
11 Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's Southern California High
12 Tech Task Force peace officers between February 22, 2023, and March 31, 2023

13
14 341. Had Defendant Elizabeth Byers, Defendant Bryce Miller, Axon Enterprise Inc., and
15 DOES 1-10 provided KING AROGANT with copies of phony and bogus LASD-created GoPro
16 video recordings GL010586 and GL010587 immediately and promptly after they were requested
17 to do so, KING AROGANT's wrongful and illegal July 11, 2024 until August 30, 2024 County
18 of Los Angeles jail incarceration would have never occurred, and thus, they are all wholly
19 responsible and liable for KING AROGANT's liberty being deprived from him for fifty-one
20 (51) consecutive days, and due to Defendant Elizabeth Byers, Defendant Bryce Miller, Axon
21 Enterprise Inc., and DOES 1-10 close government nexus with Defendants George Gascón and
22 Leo Ka Fong Lo that transformed them all into private state actors, Defendants acted under color
23 of law and recklessly violated KING AROGANT' constitutional civil rights pursuant to 42
24 U.S.C. § 1983.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 342. On information and belief Defendant Elizabeth Byers, Defendant Bryce Miller, Axon
2 Enterprise Inc., and DOES 1-10 conspired with Defendants s Jeffrey D. Macomber. Jason D.
3 Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield,
4 Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Peter Halloran, Dennis
5 L. Beck Jr., Leah Tamu Wilson, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George
6 Gascon, Cheryl Lynn Kaylor, Yingchun Chen, & DOES 1-10 to recklessly violate KING
7 AROGANT's United States Fourth and Fourteenth Amendment constitutional civil rights.

8
9 343. On June 27, 2024, Defendant Elizabeth Byers (ebyers@axon.com) and Defendant Bryce
10 Miller (bmiller@axon.com) received an email from KING AROGANT that stated the following:

11
12 MY NAME IS AROGANT HOLLYWOOD
13 MY BIRTHPLACE IS SEATTLE
14 MY DATE OF BIRTH IS 12/09/1978
15 MY SOCIAL SECURITY NUMBER IS 533-92-3047
16 MY CALIFORNIA STATE PAROLE AND CORRECTIONS NUMBER IS BX1748
17 THE FRIVOLOUS CRIMINAL CASE IS GA114055
18 THE SUPERIOR COURT IS AND WAS: STATE OF CALIFORNIA, LOS ANGELES COUNTY
19 SUPERIOR COURT, ALHAMBRA COURTHOUSE
20 THE AGENCY THAT FALSELY ARRESTED ME WAS THE COUNTY OF LOS ANGELES
21 SHERIFF'S DEPARTMENT, TEMPLE CITY POLICE STATION
22 THE LAW ENFORCEMENT AGENCY THAT FRAMED ME AND MALICIOUSLY
23 PROSECUTED ME WAS THE COUNTY OF LOS ANGELES DISTRICT ATTORNEY'S
24 OFFICE.
25 THE LAW ENFORCEMENT ATTORNEYS INVOLVED WITH FRAMING ME AND
26 CONSPIRING TO VIOLATE MY CIVIL RIGHTS WERE BRIAN MARK ROSENBERG, VICTOR
27 MANUEL RODRIGUEZ, SHARON LEE WOO, GEORGE GASCON, RONALD MILLIARD
28 GELTZ, JANICE EVE JOHNSON, STEPHANIE PEARL MIRE, ROBERT BONTA, CINDY
29 PARK AND TOO MANY MORE TO NAME HERE.

30 THE LAW ENFORCEMENT PEACE OFFICERS AND ATTORNEYS MOST RESPONSIBLE
31 WITH TESTIFYING FALSELY IN SUPERIOR COURT AND PRESENTING FALSE
32 EVIDENCE THAT WAS TRANSFERRED ON, UPLOADED TO, DOWNLOADED FROM, A
33 SHARED ON AXON'S [EVIDENCE.COM](https://evidence.com) WERE BRIAN MARK ROSENBERG, VICTOR
34 MANUEL RODRIGUEZ, JANICE EVE JOHNSON, STEPHANIE PEAR MORE, CINDY PARK,
35 SHERIFF ROBERT LUNA, BILLY S. KHOUNTHAVONG, SERGEANT FLOREZ, JUAREZ,
36 THOMAS LEO GUZMAN-SANCHEZ, JOEL SIMEONE WYENN, AND LEO KA FONG LO.

37 Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42
38 U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
39 DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
40 AMEND. XIV, CALIFORNIA TORTS FRAUD, NEGLIGENCE, NEGLIGENCE PER SE, GENERAL NEGLIGENCE, IIED, &
41 NEGLIGENCE IIED

1 THE ABOVE NAMED LAW ENFORCEMENT PEACE OFFICERS AND ATTORNEYS WERE
2 ALL RESPONSIBLE WITH WILLFULLY, RECKLESSLY, WANTONLY, MALICIOUSLY, AND
3 CALLOUSLY WITHHOLDING EXCULPATORY EVIDENCE, TAMPERING WITH
4 EXCULPATORY EVIDENCE, MANIPULATING EXCULPATORY EVIDENCE, PRESENTING
5 FALSE EVIDENCE TO A SUPERIOR COURT ON APRIL 4, 2023, APRIL 5, 2023, AND
6 FEBRUARY 2, 2024, AND CREATING FALSE EVIDENCE, ALL OF WHICH RESULTED IN

7 AROGANT HOLLYWOOD'S BEING INCARCERATED FOR NEARLY TEN MONTHS FOR A
8 VIOLENT AND SERIOUS FELONY HE NEVER COMMITTED.

9 THE ABOVE-NAMED LAW ENFORCEMENT AGENCIES' PEACE OFFICERS AND
10 ATTORNEYS USED AXON'S EVIDENCE.COM TO PRESENT FALSE EVIDENCE TO A
11 STATE OF CALIFORNIA, SUPERIOR COURT, SHARE FALSE EVIDENCE AND WITHHOLD
12 EXCULPATORY EVIDENCE, AND TO STORE FALSE EVIDENCE CREATED BY LOS
13 ANGELES COUNTY SHERIFF'S DEPARTMENT'S FRAUD AND CYBER CRIMES BUREAU
14 SOUTHERN CALIFORNIA HIGH TECH TASK

15 344. KING AROGANT's June 27, 2024 email to \gave them FAIR NOTICE that County of
16 Los Angeles Sheriff's Department peace officers and County of Los Angeles District Attorney's
17 Office rogue and dishonest prosecutors had willfully, knowingly, carelessly, wantonly,
18 maliciously, and callously uploaded phony and bogus LASD-created GoPro video recordings
19 GL010586 and GL010587 to Axon Enterprise's evidence.com for the unlawful purposes of
20 FRAMING KING AROGANT and recklessly presenting false evidence to a criminal Superior
21 Court of California.

22 345. In his detained email, KING AROGANT demanded that Defendant Elizabeth Byers,
23 Defendant Bryce Miller, Axon Enterprise Inc., and DOES 1-10 and other emailed Axon
24 Enterprise Inc. employees do the following:

25 AXON MUST IMMEDIATELY TURN OVER ALL AUDIO AND VIDEO RECORDING
26 EVIDENCE (INCLUDING 911 TAPES AND LASD BODYCAM FOOTAGE) THAT WAS
27 UPLOADED, DOWNLOADED, SHARED, AND STORED BY COUNTY OF LOS ANGELES
28 DISTRICT ATTORNEY'S OFFICE AND COUNTY OF LOS ANGELES SHERIFF'S
DEPARTMENT ATTORNEYS, PEACE OFFICERS AND/OR CIVILIAN EMPLOYEES.

U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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 AXON INC.'S FAILURE TO IMMEDIATELY TURN OVER ALL AUDIO AND VIDEO
2 RECORDINGS EVIDENCE UPLOADED, DOWNLOADED, SHARED, AND STORED BY
3 COUNTY OF LOS ANGELES SHERIFF'S DEPARTMENT AND COUNTY OF LOS ANGELES
4 DISTRICT ATTORNEY'S OFFICE WILL RESULT IN IMMEDIATE CIVIL RIGHTS
5 COMPLAINTS BEING LAUNCHED AGAINST DEBRA M. GARNREITER IN UNITED STATES
6 CENTRAL DISTRICT OF CALIFORNIA COURTHOUSES.

7 346. As of November 20, 2024, Defendant Elizabeth Byers, Defendant Bryce Miller, Axon
8 Enterprise Inc., and DOES 1-10 have all willfully, knowingly, recklessly, wantonly,
9 maliciously, and callously failed to respond to and ignored KING AROGANT's June 27, 2024
10 email.

11 347. As of November 20, 2024, Defendant Elizabeth Byers, Defendant Bryce Miller, Axon
12 Enterprise Inc., and DOES 1-10 have willfully, knowingly, recklessly, wantonly, maliciously,
13 and callously failed to turn over and disclose copies of phony and bogus LASD-created GoPro
14 video recordings GL010586 and GL010587 that were recklessly uploaded to Axon Enterprise
15 Inc.'s evidence.com by rogue and dishonest County of Los Angeles Sheriff's Department's
16 Fraud and Cyber Crimes Bureau's Southern California High Tech Task Force peace officers
17 between February 22, 2023, and March 31, 2023.

18 348. As of November 20, 2024, Defendant Elizabeth Byers, Defendant Bryce Miller, Axon
19 Enterprise Inc., and DOES 1-10 have all willfully, knowingly, recklessly, wantonly,
20 maliciously, and callously violated KING AROGANT's United States Fourteenth Amendment
21 Due Process Clause constitutional civil rights under color of law by failing to turn over and
22 disclose copies of phony and bogus LASD-created GoPro video recordings GL010586 and
23 GL010587 that were recklessly uploaded to Axon Enterprise Inc.'s evidence.com by rogue and
24 dishonest County of Los Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's
25 Southern California High Tech Task Force peace officers between February 22, 2023, and
26 March 31, 2023.

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 JUDICIAL ABUSE OF PROCESS, 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**

1 349. As of November 20, 2024, Defendant Elizabeth Byers, Defendant Bryce Miller, Axon
2 Enterprise Inc., and DOES 1-10 have all willfully, knowingly, recklessly, wantonly,
3 maliciously, and callously committed reckless under color of law DECEIT by concealing from,
4 hiding from, failing to disclose, failing to tell, and failing to otherwise inform the Superior Court
5 of California, County of Los Angeles, Alhambra Superior Court that they were all in possession
6 of or had immediate access to digital and/or electronic copies of phony and bogus LASD-created
7 GoPro video recordings GL010586 and GL010587 that were recklessly uploaded to Axon
8 Enterprise Inc.'s evidence.com by rogue and dishonest County of Los Angeles Sheriff's
9 Department's Fraud and Cyber Crimes Bureau's Southern California High Tech Task Force
10 peace officers between February 22, 2023, and March 31, 2023.

11
12 350. Between June 27, 2024, and July 7, 2024, Defendant Elizabeth Byers, Defendant Bryce
13 Miller, Axon Enterprise Inc., and DOES 1-10 have all willfully, knowingly, recklessly,
14 wantonly, maliciously, and callously committed reckless under color of law DECEIT by
15 concealing from, hiding from, failing to disclose, failing to tell, and failing to otherwise inform
16 the Superior Court of California, County of Los Angeles, Alhambra Superior Court that they
17 were all in possession of or had immediate access to digital and/or electronic copies of phony
18 and bogus LASD-created GoPro video recordings GL010586 and GL010587 that were
19 recklessly uploaded to Axon Enterprise Inc.'s evidence.com by rogue and dishonest County of
20 Los Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's Southern California
21 High Tech Task Force peace officers between February 22, 2023, and March 31, 2023 which led
22 to the July 11, 2024 to August 30, 2024 wrongful and illegal County of Los Angeles jail
23 incarceration of KING AROGANT. Had Defendants Elizabeth Byers, Bryce Miller, Axon
24 Enterprise Inc., and DOES 1-10 provided KING AROGANT with copies of phony and bogus
25 LASD-created GoPro video recordings GL010586 and GL010587 immediately and promptly
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 JUDICIAL ABUSE OF PROCESS, 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 after they were requested to do so, KING AROGANT's wrongful and illegal July 11, 2024, until
2 August 30, 2024, County of Los Angeles jail incarceration would have never occurred.

3
4 351. Thus, Defendant Elizabeth Byers, Defendant Bryce Miller, Axon Enterprise Inc., and
5 DOES 1-10's reckless under color of law DECEIT by concealing from, hiding from, failing to
6 disclose, failing to tell, and failing to otherwise inform the Superior Court of California, County
7 of Los Angeles, Alhambra Superior Court that they were all in possession of or had immediate
8 access to digital and/or electronic copies of phony and bogus LASD-created GoPro video
9 recordings GL010586 and GL010587 that were recklessly uploaded to Axon Enterprise Inc.'s
10 evidence.com by rogue and dishonest County of Los Angeles Sheriff's Department's Fraud and
11 Cyber Crimes Bureau's Southern California High Tech Task Force peace officers between
12 February 22, 2023, and March 31, 2023, which led to July 11, 2024, to August 30, 2024
13 wrongful and illegal County of Los Angeles jail incarceration of KING AROGANT made them
14 wholly responsible for KING AROGANT's liberty being taken away for fifty-one (51)
15 consecutive days because KING AROGANT's July 11, 2024, to August 30, 2024, wrongful
16 incarceration would have never occurred if Defendants Elizabeth Byers, Bryce Miller, Axon
17 Enterprise Inc., and DOES 1-10 had of promptly turned over and disclosed copies of phony and
18 bogus LASD-created GoPro video recordings GL010586 and GL010587 that were recklessly
19 uploaded to Axon Enterprise Inc.'s evidence.com by rogue and dishonest County of Los
20 Angeles Sheriff's Department's Fraud and Cyber Crimes Bureau's Southern California High
21 Tech Task Force peace officers between February 22, 2023, and March 31, 2023

22
23 352. Had Defendant Elizabeth Byers, Defendant Bryce Miller, Axon Enterprise Inc., and
24 DOES 1-10 provided KING AROGANT with copies of phony and bogus LASD-created GoPro
25 video recordings GL010586 and GL010587 immediately and promptly after they were requested
26 to do so, KING AROGANT's wrongful and illegal July 11, 2024 until August 30, 2024 County

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 JUDICIAL ABUSE OF PROCESS, 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 of Los Angeles jail incarceration would have never occurred, and thus, they are all wholly
2 responsible and liable for KING AROGANT's liberty being deprived from him for fifty-one
3 (51) consecutive days, and due to Defendant Elizabeth Byers, Defendant Bryce Miller, Axon
4 Enterprise Inc., and DOES 1-10 close government nexus with Defendants George Gascón and
5 Leo Ka Fong Lo that transformed them all into private state actors, Defendants acted under color
6 of law and recklessly violated KING AROGANT' constitutional civil rights pursuant to 42
7 U.S.C. § 1983.

8
9 353. On information and belief Elizabeth Byers, Bryce Miller, and DOES 1-10 conspired with
10 Defendants Jeffrey D. Macomber. Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
11 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
12 Robert Andres Bonta, Peter Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Bryce Miller,
13 Elizabeth Byers, Leo Ka Fong Lo, George Gascon, Cheryl Lynn Kaylor, Yingchun Chen, &
14 DOES 1-10 to recklessly violate KING AROGANT's United States Fourth and Fourteenth
15 Amendment constitutional civil rights.

16
17
18 **H. GOPRO, INC. DEFENDANTS BRIAN MCGEE & ASHLEY ALBIENTO**
19 **COMMITTED RECKLESS UNDER COLOR OF LAW DECEIT, RECKLESS**
20 **UNDER COLOR OF LAW FRAUD, RECKLESS UNDER COLOR OF LAW**
21 **FRAUD UPON THE COURT; RECEIVED FAIR NOTICE THAT THEY WERE**
22 **BOTH RECKLESSLY VIOLATING KING AROGANT'S CONSTITUTIONAL**
23 **CIVIL RIGHTS AND GOPRO DEFENDANTS CONSPIRED WITH ALL**
24 **EMAILED DEFENDANTS TO RECKLESSLY VIOLATE KING AROGANT'S**
25 **FOURTH & FOURTEENTH AMENDMENT CONSTITUTIONAL CIVIL**
26 **RIGHTS.**

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 JUDICIAL ABUSE OF PROCESS, 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, HED, & NEGLIGENT HED**

1 354. Plaintiff KING AROGANT hereby restates, realleges, reiterates, reincorporates,
2 and incorporates by reference previous paragraphs 1-353 of this original civil rights
3 complaint.

4
5 355. On May 24, 2023, KING AROGANT requested in writing that in collusion and
6 prejudiced Superior Court of California judicial officer Michael Villalobos issue a criminal
7 personal appearance subpoena for the personal appearance of a GoPro expert witness to testify
8 regarding George Gascón, Victor Manuel Rodriguez, Brian MARK Rosenberg, James William
9 Garrison, Stephanie Pearl Mire, Ronald Millard Geltz, Sharon Lee Woo, Diana Maria Teran,
10 Arisa Mattson, and DOES 1-10's phony and bogus LASD-created GoPro video recordings
11 GL010586 and GL010587. KING AROGANT's motion was handwritten and titled:

12 ***Criminal Subpoena Ordering the Appearance of GoPro Inc. to Provide Expert Testimony***
13 ***Regarding GoPro Timestamp and GoPro Studio Video Software***

14
15 See now a true and correct copy of KING AROGANT's GoPro subpoena filed with the Superior
16 Court of California, County of Los Angeles, Alhambra Superior Court attached as Exhibit
17 _____ of KING AROGANT'S Verified Appendix of Exhibits, and also below.

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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 JUDICIAL ABUSE OF PROCESS, 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**

FILED
Superior Court of California
County of Los Angeles

MAY 24 2023

David W. Staylor, Executive Officer/Clerk of Court

By: A. Maciel, Deputy

2 copies to Δ
today

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7. SUPERIOR COURT OF CALIFORNIA
8. NORTHEAST DISTRICT, COUNTY OF LOS ANGELES
9. ALHAMBRA SUPERIOR COURT

11. people of the state of California,
Plaintiff,

v.
16. AROGANT HOLLYWOOD,
Defendant,

Case No. GA114055
Criminal Subpoena
Ordering the Appearance
of GOPRO Inc. to
Provide Expert Testim-
ony Regarding GOPRO
Timestamp and GOPRO
Studio Video Software
Date: ~~June~~ JULY 7th 2023
Dept. 1, Honorable Villalobos

24. TO: GOPRO INC.
25. 330 NORTH BRAND BLVD
26. SUITE 700
27. GLENDALE, CA

28. YOU ARE HEREBY ORDERED to appear at Defendant

CRIMINAL SUBPOENA FOR GOPRO INC.

1 -
[UNDER COLOR OF STATUTE ABUSE OF PROCESS], VIOLATION OF CIVIL RIGHTS [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, & NEGLIGENCE IED

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4 Alhambra Superior Court
5 150 West Commonwealth Avenue
6 Alhambra, CA 91801
7 Department 2, Honorable Michael Villalobos
8 at 8:30 a.m. on ~~June~~ ^{JULY} 7th 2022

9 IT IS FURTHER ORDERED that LASD Civil
10 Management Bureau accept Defendant's handwritten
11 criminal subpoena and serve it upon GOPRO INC. at
12 its California Registered Agent for Service of Process
13 at the physical business address of:

14
15 GOPRO INC.
16 330 NORTH BRAND BLVD
17 SUITE 700
18 GLENDALE, CA 91203

19 IT IS FURTHER ORDERED that LASD Civil Management
20 Bureau serve this handwritten criminal subpoena
21 upon expert criminal witness GOPRO INC. at no
22 cost to Arrogant Hollywood, and on behalf of

23
24 CRIMINAL SUBPOENA FOR GOPRO INC.

25
26
27 - 3 -

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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

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Defendant, LASD's service of this handwritten criminal subpoena shall be paid for by Los Angeles County funds set aside for propria persona (pro-per) criminal defendants.

~~IT IS FURTHER ORDERED that Alhambra Superior Court Administrator Lisa Jackson be authorized to ^{MV}fax or ^{MV}email a copy of this criminal subpoena to ^{MV}LASD Civil Management Bureau.~~

GOPRO INC.'s failure to comply with this criminal subpoena will result in criminal sanctions being imposed against it.

IT IS SO ORDERED
DATE: 5/24/23



Michael Villalobos
Honorable Michael Villalobos
JUDGE MICHAEL VILLALOBOS

CRIMINAL SUBPOENA FOR GOPRO

- 4 -

U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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, HED, & NEGLIGENT HED

1 Michael Villalobos granted the request and subpoena was issued for Brian McGee.

2
3 356. In May 2023, KING AROGANT's fiancée Alison Helen Fairchild personally served a
4 copy of KING AROGANT's criminal subpoena, and then again in June 2023, GoPro was
5 personally served a copy of KING AROGANT's criminal subpoena at 3025 Clearview Way,
6 San Mateo, CA 94402, which is the worldwide headquarters for public traded company GoPro
7 Inc.

8
9 357. In late June 2023, Superior Court of California, County of Los Angeles court-appointed
10 private investigator Carlos Anthony Jackson personally served GoPro Inc. a copy of KING
11 AROGANT's criminal subpoena at its registered agent address of 330 N. Brand Blvd, Suite 700,
12 Glendale, CA 91203.

13
14 358. Between late May 2023 and July 7, 2023, Defendant Brian McGee, GoPro Inc., and
15 DOES 1-10 committed reckless under color of FRAUD, reckless under color of law FRAUD
16 UPON THE COURT, reckless under color of law DECEIT, and reckless under color of law Due
17 Process Clause violations by willfully, knowingly, recklessly, carelessly, wantonly, maliciously,
18 and callously hiring law firm Bartko Zankel Bunzel Miller, rogue associate attorney Josiah
19 Richard Jenkins (SBN # 332418), and rogue attorney An Nguyen Ruda (SBN # 215453) to
20 quash the criminal subpoenas that was served upon GoPro Inc. while Defendant Brian McGee
21 knew that he could have commanded an appropriate GoPro Inc. employee to had testified to oral
22 testimony regarding George Gascón's phony and bogus LASD-created GoPro video recordings
23 GL010586 and GL010587 that would have instantaneously exonerated KING AROGANT. It is
24 important to note herein that rogue and dishonest attorney An Nguyen Ruda since 2020 has been
25 the Co-Managing Partner and Chief Executive Officer of Bartko Zankel Bunzel Miller.

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 JUDICIAL ABUSE OF PROCESS, 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**

1 359. Acting under color of law and recklessly working in collusion with corrupt and biased
2 Superior Court of California judicial officer Michael Villalobos. In July 2023 Josiah Richard
3 Jenkins (SBN # 332418), and rogue attorney An Nguyen Ruda (SBN # 215453) willfully,
4 knowingly, recklessly, carelessly, wantonly, maliciously, and callously had a secret telephone
5 meeting with Michael Villalobos where they had a meeting of minds that they would all
6 recklessly violate KING AROGANT's constitutional Fourth and Fourteenth Amendment
7 constitutional civil rights. The legal documents that were secretly given to Michael Villalobos
8 by Josiah Richard Jenkins (SBN # 332418), and rogue attorney An Nguyen Ruda (SBN #
9 215453) were deliberately never filed with the Superior Court of California, County of Los
10 Angeles, Alhambra Superior Court criminal clerk's office nor Department 1. Further, the secret
11 telephone meeting was done outside the presence of KING AROGANT, and KING AROGANT
12 did not have knowledge and/or find out about the secret meeting until November 22, 2024.
13 Lastly, the legal court documents pleadings that was secretly sent to corrupt judicial officer
14 Michael Villalobos were not only recklessly never filed with the State of California, County of
15 Los Angeles, Alhambra Superior Court, the legal pleadings secretly submitted to corrupt judicial
16 officer Michael Villalobos were also never served upon KING AROGANT prior to the the
17 secret telephonic meeting between Michael Villalobos and rogue attorney Josiah Richard
18 Jenkins (SBN # 332418), rogue attorney An Nguyen Ruda (SBN # 215453), and corrupt law
19 firm Bartko Zankel Bunzel Miller. A true and correct copy of Bartko Zankel Bunzel Miller's
20 legal pleadings that objected to KING AROGANT's GoPro Inc. criminal subpoenas is attached
21 as Exhibit ____ of KING AROGANT's Verified Appendix of Exhibits and also below.

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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 JUDICIAL ABUSE OF PROCESS, 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**

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1 AN NGUYEN RUDA (SBN 215453)
aruda@bzbm.com
2 JOSIAH R. JENKINS (SBN 332418)
jjenkins@bzbm.com
3 BARTKO ZANKEL BUNZEL & MILLER
A Professional Law Corporation
4 11845 W. Olympic Blvd., Suite 845
Los Angeles, CA 90064
5 Telephone: (310) 907-5988
6 Facsimile: (310) 229-9804
7
8 Attorneys for GOPRO, INC.

8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF LOS ANGELES, NORTHEAST DISTRICT

11 THE PEOPLE, of the State of California,
12
13 v.
14 AROGANT HOLLYWOOD,
15 Defendant.

Case No. GA114055

**GOPRO, INC.'S OBJECTIONS TO
SUBPOENA ORDERING APPEARANCE
OF GOPRO, INC. TO PROVIDE EXPERT
TESTIMONY REGARDING GOPRO
TIMESTAMP AND GOPRO STUDIO
VIDEO SOFTWARE**

18 GoPro, Inc. raises the following Objections to the Subpoena Ordering Appearance of
19 GoPro, Inc. to Provide Expert Testimony Regarding GoPro Timestamp and GoPro Studio Video
20 Software ("the Subpoena"), which was issued on or about May 24, 2023 and any prior subpoenas
21 issued in this action.

22 The Subpoena – and all other previously issued subpoenas seeking to compel the testimony
23 of GoPro, Inc. in this action – are facially improper.

24 First, the subpoenas are plainly improper under the Penal Code because they do not include
25 the required "written notice on the subpoena that the witness may be entitled to receive fees and
26 mileage."(Cal. Pen. Code, § 1329.1).

27 ///

28 ///

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GOPRO, INC.'S OBJECTIONS TO SUBPOENA ORDERING APPEARANCE OF GOPRO, INC. TO PROVIDE
EXPERT TESTIMONY REGARDING GOPRO TIMESTAMP AND GOPRO STUDIO VIDEO SOFTWARE

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 JUDICIAL ABUSE OF PROCESS, 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

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1 Second, GoPro, Inc. objects on the basis that it is not an appropriate party for an
2 appearance subpoena. The Penal Code discusses testifying witnesses in terms that are logically
3 applied to natural persons, rather than corporations. The Penal Code section regarding the
4 compelled attendance of witnesses makes clear that the persons who can be compelled to testify
5 are natural persons. (*See e.g.* Cal. Pen. Code §§ 1330 [referring to “his or her place of residence,”
6 “his or her counsel,” and “his or her attendance.”]; 1331 [referencing “his nonattendance”];
7 1332(c) [“his or her failure”]; *see also* Cal. Pen. Code, § 136(2) [defining “Witness” as a “natural
8 person”].) The Penal Code section on compelled attendance of witnesses mentions entities only in
9 connection with the production of “books, papers, documents, or records” by custodians of
10 records. (Cal. Pen. Code § 1326(b).) From the structure of the relevant provisions, it is plain that
11 appearance subpoenas may be issued only to natural persons, not corporations.

12 Even if GoPro, Inc., writ large, could be required to testify, the subpoena is objectionable
13 because it is overly vague and does not provide reasonable notice which natural person should
14 attend the court proceedings. (*Monteleone v. Southern California Vending Corp.* (1968) 264
15 Cal.App.2d 798, 806 [noting that corporations act only through natural persons].) The subject
16 matter set out in the Subpoena is overly vague, with ambiguous questions about “a GOPRO video
17 recording,” without any necessary further detail concerning the device used, form of recording, or
18 other information that could be used to discern the proper attendee. Further, the subject matter at
19 issue calls, on its face, for speculation. (*See* Subpoena, 2:13-15.)

20 Compounding these problems, in the caption, the subpoena calls for “expert testimony.”
21 The Evidence Code sets out standards for the appointment of experts, whether by the parties or by
22 the Court. (*See* Cal. Evid. Code §§ 720-723, 730-733.) The call for an expert witness is
23 objectionable because it places an undue burden on GoPro, Inc. to qualify an expert under the
24 Evidence Code. (*See* Cal. Evid. Code § 720.) If the defendant wishes to appoint an expert, then he
25 should do so in accordance with the relevant statutes, rather than shifting the burden to a third
26 party to do the same.

27 ///
28 ///

2
GOPRO, INC.'S OBJECTIONS TO SUBPOENA ORDERING APPEARANCE OF GOPRO, INC. TO PROVIDE
EXPERT TESTIMONY REGARDING GOPRO TIMESTAMP AND GOPRO STUDIO VIDEO SOFTWARE

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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 JUDICIAL ABUSE OF PROCESS, 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

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For these aforementioned reasons, GoPro, Inc. objects to the subpoena in its entirety.

DATED: July 7, 2023

Respectfully submitted,

By: 

An Nguyen Ruda
Josiah R. Jenkins
Attorneys for GoPro, Inc.

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 JUDICIAL ABUSE OF PROCESS, 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

1 360. Josiah Richard Jenkins (SBN # 332418), rogue attorney An Nguyen Ruda (SBN #
2 215453), corrupt law firm Bartko Zankel Bunzel Miller GoPro Inc., Defendant Brian McGee,
3 and DOES 1-10's secretly meeting supplied never filed court document is so frivolous and
4 unconstitutional it did not even include a proof of service!

5
6 361. On August 21, 2023, KING AROGANT was back in Superior Court of California,
7 County of Los Angeles, Alhambra Superior Court, Department 1. While in Superior Court
8 KING AROGANT had a County of Los Angeles bailiff peace officer hand a copy of his
9 handwritten subpoenas to corrupt, biased, and prejudiced judicial officer Michael Villalobos.
10 KING AROGANT submitted handwritten subpoenas requesting that Defendant Brian McGee
11 and GoPro Chief Executive Officer and founder Nicholas Woodman be ordered to appear to
12 testify regarding George Gascón, Victor Manuel Rodriguez, Brian MARK Rosenberg, James
13 William Garrison, Stephanie Pearl Mire, Ronald Millard Geltz, Sharon Lee Woo, Diana Maria
14 Teran, Arisa Mattson, and DOES 1-10's phony and bogus GoPro video recordings GL010586
15 and GL010587. Superior Court of California corrupt and biased judicial officer Michael
16 Villalobos denied KING AROGANT's request to subpoena Defendant Brian McGee and GoPro
17 Inc. Chief Executive Officer Nicholas Woodman based upon the conspiracy between Michael
18 Villalobos and rogue attorney Josiah Richard Jenkins (SBN # 332418), rogue attorney An
19 Nguyen Ruda (SBN # 215453), Defendant Brian McGee, GoPro Inc., Nicholas Woodman,
20 corrupt law firm Bartko Zankel Bunzel Miller and DOES 1-10 to willfully, knowingly,
21 recklessly, carelessly, wantonly, maliciously, and callously violate the United States
22 Constitution and KING AROGANT's United States Fourteenth Amendment Due Process
23 Clause constitutional civil rights in which they all had a meeting of minds at their secretly held
24 telephonic meeting that they would recklessly violate KING AROGANT's Fourteenth
25 Amendment Due Process Clause constitutional civil rights.

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 JUDICIAL ABUSE OF PROCESS, 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, HED, & NEGLIGENT HED**

1 362. On September 6, 2023, KING AROGANT was back in Superior Court to file and have a
2 hearing on his motion titled:

3
4 **INNOCENT CRIMINAL DEFENDANT AROGANT HOLLYWOOD'S MOTION TO**
5 **APPROVE SUBPOENAS AND COMPEL TRIAL COURT ATTENDANCE OF GOPRO**
6 **INC. EXECUTIVES NICHOLAS WOODMAN, NICK WOODMAN, BRIAN MCGEE,**
7 **AND STEVEN BAUMER PURSUANT TO CALIFORNIA EVIDENCE CODE SECTION**
8 **140, 210, 250, 350, 622, 720, AND 730, AND DUE PROCESS CLAUSE OF THE**
9 **FOURTEENTH AMENDMENT**

10
11 KING AROGANT argued in his motion to compel GoPro Inc. executives Nicholas Woodman
12 and Brian McGee were most qualified to testify that George Gascón, Victor Manuel Rodriguez,
13 Brian MARK Rosenberg, James William Garrison, Stephanie Pearl Mire, Ronald Millard Geltz,
14 Sharon Lee Woo, Diana Maria Teran, Arisa Mattson, and DOES 1-10's phony and bogus GoPro
15 video recordings GL010586 and GL010587 were not recorded by KING AROGANT on
16 February 21, 2023. Superior Court of California corrupt and biased judicial officer Michael
17 Villalobos denied KING AROGANT's motion to compel Defendant Brian McGee and GoPro
18 Inc. Chief Executive Officer Nicholas Woodman to testify based upon the conspiracy between
19 Michael Villalobos and rogue attorney Josiah Richard Jenkins (SBN # 332418), rogue attorney
20 An Nguyen Ruda (SBN # 215453), Defendant Brian McGee, GoPro Inc., Nicholas Woodman,
21 corrupt law firm Bartko Zankel Bunzel Miller and DOES 1-10 to willfully, knowingly,
22 recklessly, carelessly, wantonly, maliciously, and callously violate the United States
23 Constitution and KING AROGANT's United States Fourteenth Amendment Due Process
24 Clause constitutional civil rights in which they all had a meeting of minds at their secretly held
25 telephonic meeting that they would recklessly violate KING AROGANT's Fourteenth
26 Amendment Due Process Clause constitutional civil rights. In KING AROGANT's motion to

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 JUDICIAL ABUSE OF PROCESS, 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 compel the court attendance of GoPro Inc. executives Brian McGee and Nicholas Woodman
2 KING AROGANT wrote the work GoPro at least sixty times through the nearly 30-page
3 motion, proving by clear and convincing evidence that KING AROGANT's motion to compel
4 was recklessly denied by the prejudiced, biased, and working in collusion with Defendant Brian
5 McGee, GoPro Inc., Nicholas Woodman, corrupt law firm Bartko Zankel Bunzel Miller and
6 DOES 1-10, Superior Court of California judicial officer Michael Villalobos.

7
8 363. Defendant Brian McGee, Josiah Richard Jenkins (SBN # 332418), rogue attorney An
9 Nguyen Ruda (SBN # 215453), Defendant Brian McGee, GoPro Inc., Nicholas Woodman,
10 corrupt law firm Bartko Zankel Bunzel Miller, and DOES 1-10 all willfully, knowingly,
11 recklessly, carelessly, wantonly, maliciously, and callously committed under color of FRAUD
12 by misrepresenting to, lying to, misleading, fabricating lies, and otherwise deceiving a criminal
13 Superior Court of California courtroom by submitting to it unfiled legal pleadings created for the
14 unlawful purpose of recklessly violating the United States Constitution, KING AROGANT's
15 Fourteenth Amendment constitutional civil rights, and to gain an unfair advantage over KING
16 AROGANT.

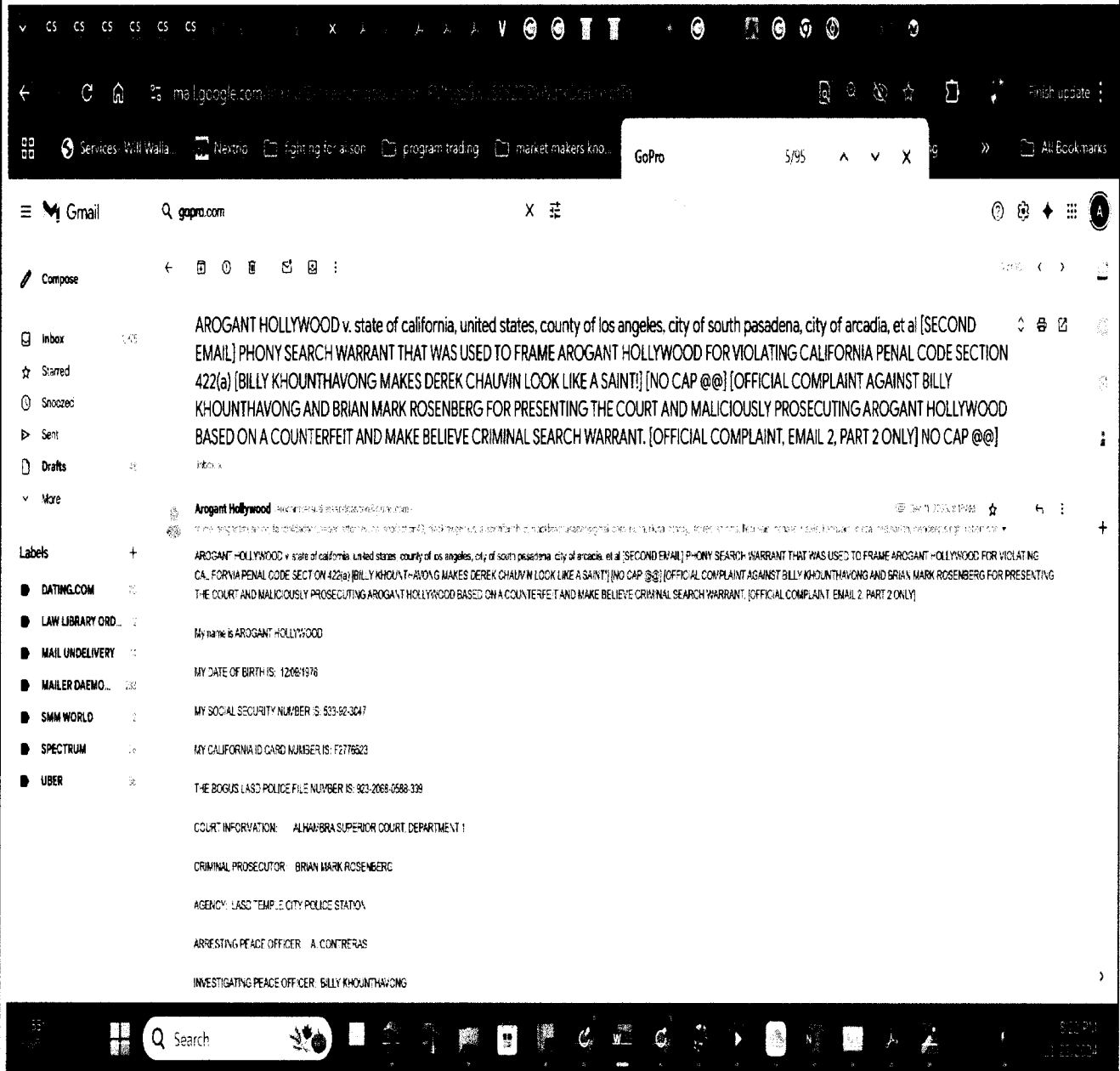
17
18 364. Defendant Brian McGee, Josiah Richard Jenkins (SBN # 332418), rogue attorney An
19 Nguyen Ruda (SBN # 215453), Defendant Brian McGee, GoPro Inc., Nicholas Woodman,
20 corrupt law firm Bartko Zankel Bunzel Miller, and DOES 1-10 all willfully, knowingly,
21 recklessly, carelessly, wantonly, maliciously, and callously committed under color of DECEIT
22 by concealing from, hiding from, failing to disclose, failing to tell, and otherwise failing to
23 inform a criminal Superior Court of California courtroom that they had valuable information
24 that they could had testified to that would had exonerated KING AROGANT and proved that
25 that George Gascón, Victor Manuel Rodriguez, Brian MARK Rosenberg, James William
26 Garrison, Stephanie Pearl Mire, Ronald Millard Geltz, Sharon Lee Woo, Diana Maria Teran,

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 JUDICIAL ABUSE OF PROCESS, 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 Arisa Mattson, and DOES 1-10 and DOES 1-10's phony and bogus LASD-created GoPro video
2 recordings GL010586 and GL010587 were not recorded and created by KING AROGANT on
3 February 21, 2023. Which was reckless under color of DECEIT done by Defendant Brian
4 McGee, Josiah Richard Jenkins (SBN # 332418), rogue attorney An Nguyen Ruda (SBN #
5 215453), Defendant Brian McGee, GoPro Inc., Nicholas Woodman, corrupt law firm Bartko
6 Zankel Bunzel Miller, and DOES 1-10 by them doing, by them using, by them concealing, by
7 them manipulating, by them employing, and by them otherwise engaging in illusory and
8 manipulated illegal acts of deceit, deception, concealment, conspiracies, fraud, and corruption so
9 that they could all gain an unfair, unjust, illegal, unlawful, and unconstitutional advantage over
10 KING AROGANT.

11
12 365. On December 11, 2023, KING AROGANT sent an email to Defendant Brian McGee
13 (brianmcgee@gopro.com) giving him FAIR NOTICE that County of Los Angeles criminal
14 prosecutors and peace officers had framed KING AROGANT by manipulating KING
15 AROGANT's GoPro video recordings. In KING AROGANT's detailed email sent to Defendant
16 Brian McGee, he wrote the trademarked word: "GoPro" ninety-five times. See now a true and
17 correct copy of the first page of KING AROGANT's December 11, 2023 email sent to
18 Defendant Brian McGee attached as Exhibit _____ of KING AROGANT's Verified Appendix
19 of Exhibits, and also below.

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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 JUDICIAL ABUSE OF PROCESS, 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**

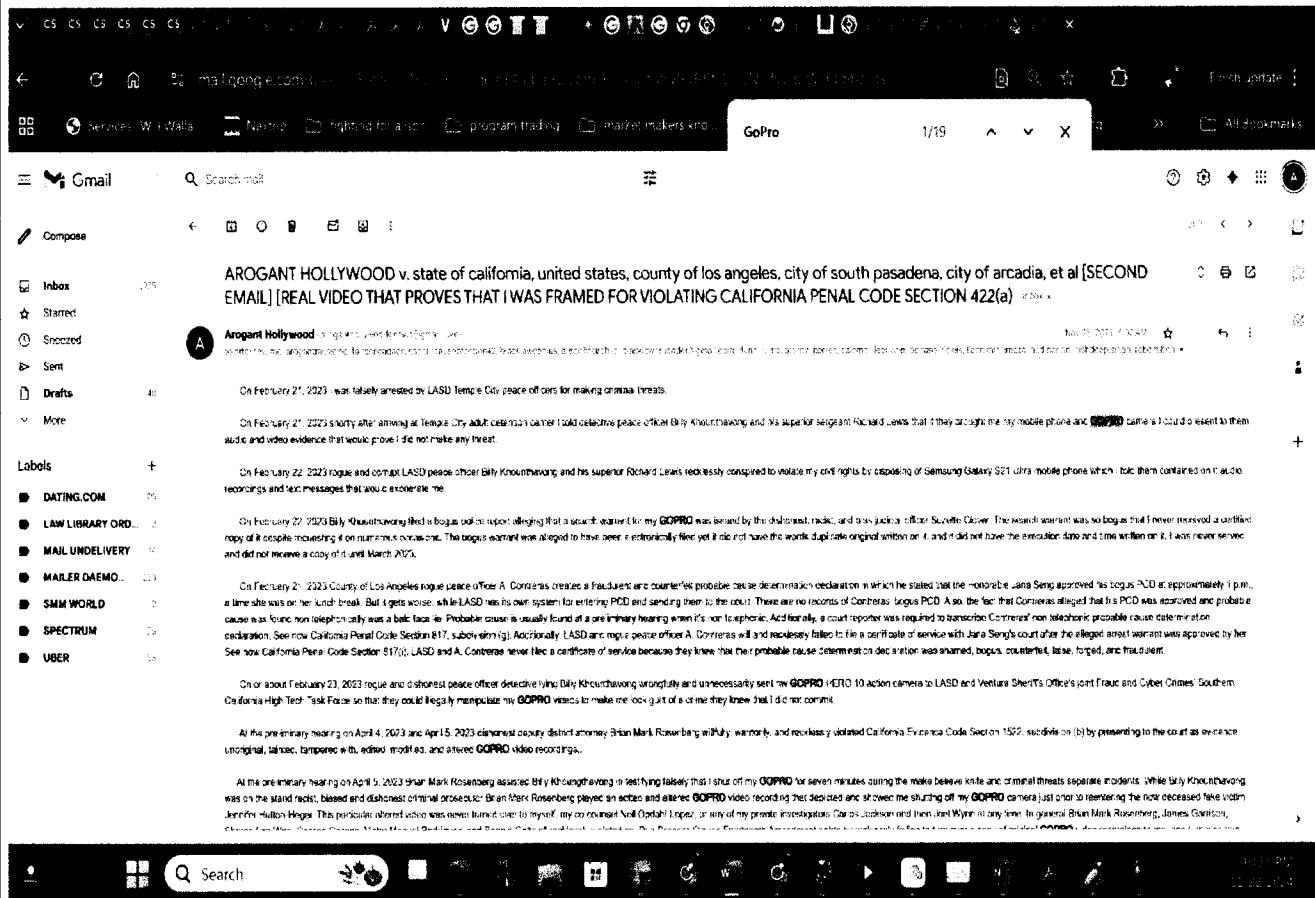


Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, Violation 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
2
3 366. On June 13, 2024, KING AROGANT forwarded his same December 11, 2023 email to
4 Defendant Brian McGee (brianmcgee@gopro.com) and Defendant Ashely Albiento
5 (aalbiento@gopro.com) (Senior Manager of Business Operations and Strategy at GoPro Inc.)
6 giving them FAIR NOTICE that County of Los Angeles criminal prosecutors and peace officers
7 had framed KING AROGANT by manipulating KING AROGANT's GoPro video recordings.
8 In KING AROGANT's detailed email sent to Defendant Brian McGee and Defendant Ashley
9 Albiento, he wrote the trademarked word: "GoPro" ninety-five times.

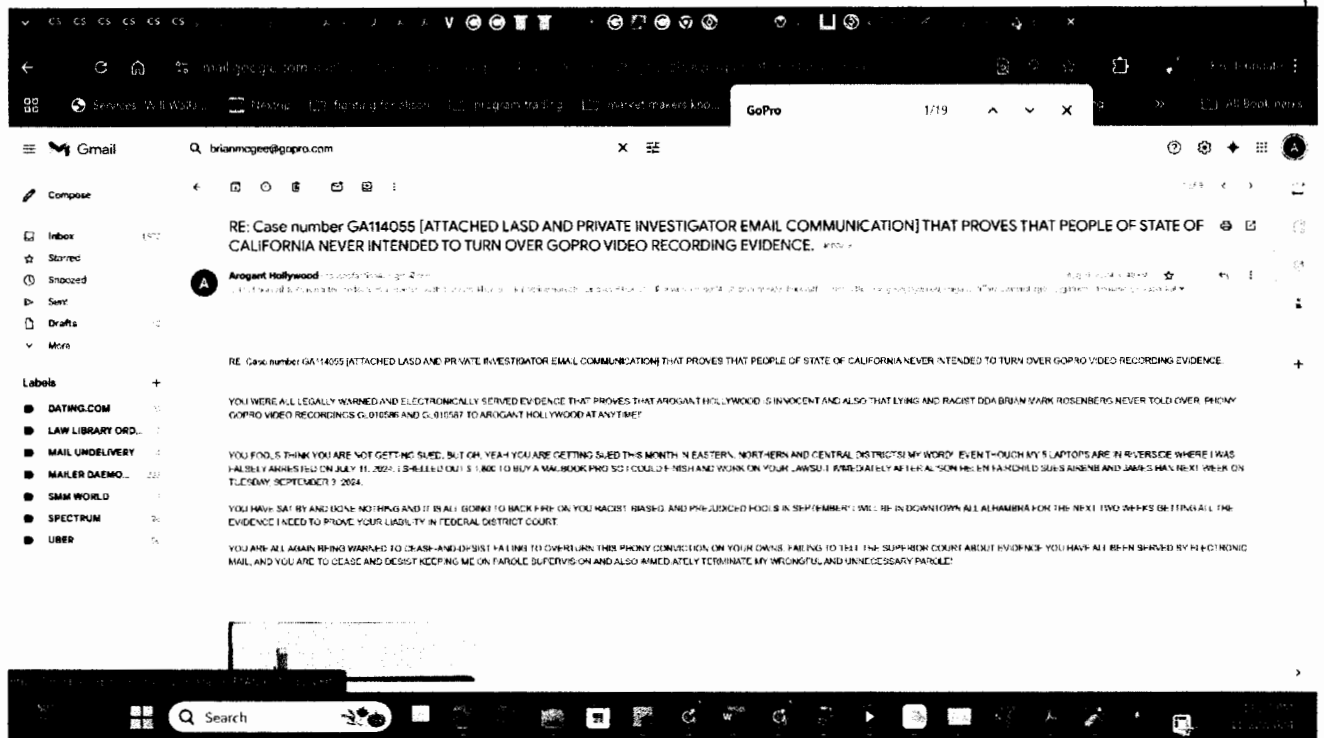
10
11 367. On June 14, 2024, KING AROGANT forwarded his original November 28, 2023 email
12 that detailed how County of Los Angeles criminal prosecutors tainted and manipulated his
13 original GoPro video recordings to Defendant Brian McGee (brianmcgee@gopro.com) and
14 Defendant Ashely Albiento (aalbiento@gopro.com) (Senior Manager of Business Operations
15 and Strategy at GoPro Inc.) giving them FAIR NOTICE that County of Los Angeles criminal
16 prosecutors and peace officers had framed KING AROGANT by manipulating KING
17 AROGANT's GoPro video recordings. In KING AROGANT's detailed email sent to Defendant
18 Brian McGee and Defendant Ashley Albiento, he wrote the trademarked word: "GoPro"
19 nineteen times. See now a true and correct copy of the first page of KING AROGANT's
20 forwarded November 28, 2023 email sent to Defendant Brian McGee and Defendant Ashley
21 Albiento attached as Exhibit _____ of KING AROGANT's Verified Appendix of Exhibits, and
22 also below.

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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IED**



368. On August 31, 2024, KING AROGANT sent an email to Defendant Brian McGee (brianmcgee@gopro.com) and Defendant Ashely Albiento (aalbiento@gopro.com) (Senior Manager of Business Operations and Strategy at GoPro Inc.) giving them FAIR NOTICE that County of Los Angeles criminal prosecutors and peace officers had framed KING AROGANT by manipulating KING AROGANT's GoPro video recordings. In KING AROGANT's detailed email sent to Defendant Brian McGee and Defendant Ashley Albiento, he wrote the trademarked word: "GoPro" nineteen times. See now a true and correct copy of the first page of KING AROGANT's forwarded November 28, 2023, email sent to Defendant Brian McGee and 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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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

Defendant Ashley Albiento is attached as Exhibit _____ of KING AROGANT's Verified Appendix of Exhibits, and also below.



369. Between May 2023 and November 23, 2024 Defendant Brian McGee, Josiah Richard Jenkins (SBN # 332418), rogue attorney An Nguyen Ruda (SBN # 215453), GoPro Inc., Nicholas Woodman, corrupt law firm Bartko Zankel Bunzel Miller, and DOES 1-10 all willfully, knowingly, recklessly, carelessly, wantonly, maliciously, and callously violated the United States Constitution and KING AROGANT's Fourteenth Amendment Due Process

Clause constitutional civil rights because they all knew that GoPro Inc. executives Brian 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 JUDICIAL ABUSE OF PROCESS, 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
2 McGee and Nicholas Woodman could have testified to the following facts that would have
3 instantaneously exonerated KING AROGANT and also proved George Gascón, Victor Manuel
4 Rodriguez, Brian MARK Rosenberg, James William Garrison, Stephanie Pearl Mire, Ronald
5 Millard Geltz, Sharon Lee Woo, Diana Maria Teran, Arisa Mattson, and DOES 1-10's phony
6 and bogus GoPro video recordings GL010586 and GL010587 were not created by KING
7 AROGANT on February 21, 2023:

- 8
- 9 1. If GoPro video recordings GL010586, GL010587, and GL010588 all totaled
10 fourteen minutes, it would have been impossible for KING AROGANT's GoPro camera
11 to have been shut off for seven consecutive minutes between 9:59 AM and 10:06 AM.
12
 - 13 2. If the GoPro camera was mounted on KING AROGANT's chest it would have been
14 impossible for KING AROGANT to have recorded the back himself as seen in
15 Defendant George Gascón's phony and bogus LASD-created GoPro video recording
16 GL010586.
17
 - 18 3. That GoPro video recordings GL010586, GL010587, and GL010588 were one continuous
19 GoPro video recording that was split up recklessly by County of Los Angeles peace
20 officers.
21
 - 22 4. Based on February 15, 2023, access date of manipulated GoPro video recordings
23 GL010586, GL010587, and GL010588 it would have been impossible for KING
24 AROGANT to have recorded phony GoPro video recordings on February 21, 2023.
25
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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
2 5. GoPro videos cannot be created and recorded without sound. In Gascón's phony LASD
3 GoPro video recording GL010586 that was played recklessly by rogue and dishonest
4 County of Los Angeles criminal prosecutor Brian MARK Rosenberg on April 4, 2023,
5 April 5, 2023, and February 2, 2024.

6
7 370. As of November 23, 2024, Defendant Brian McGee has willfully, knowingly, recklessly,
8 wantonly, maliciously, and callously failed to respond to and ignored KING AROGANT's
9 December 11, 2023 email.

10
11 371. As of November 23, 2024, Defendant Brian McGee has willfully, knowingly, recklessly,
12 wantonly, maliciously, and callously failed to respond to and ignored KING AROGANT's June
13 13, 2024, June 14, 2024, and August 31, 2024, emails.

14
15 372. As of November 23, 2024, Defendant Brian McGee has willfully, knowingly, recklessly,
16 wantonly, maliciously, and callously failed to respond to and ignored KING AROGANT's June
17 13, 2024, June 14, 2024, and August 31, 2024 emails.

18
19 373. As of November 23, 2024, Defendant Brian McGee has willfully, knowingly, recklessly,
20 wantonly, maliciously, and callously failed to respond to and ignored KING AROGANT's June
21 13, 2024, June 14, 2024, and August 31, 2024 emails.

22
23 374. As of November 23, 2024, Defendant Ashley Albiento has willfully, knowingly,
24 recklessly, wantonly, maliciously, and callously failed to respond to and ignored KING
25 AROGANT's June 13, 2024, June 14, 2024, and August 31, 2024 emails.

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 JUDICIAL ABUSE OF PROCESS, 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
2 375. Since May 2023 and continuing to the very day of this civil rights complaint, Defendant
3 Brian McGee, Defendant Ashley Albiento, Josiah Richard Jenkins (SBN # 332418), rogue
4 attorney An Nguyen Ruda (SBN # 215453), GoPro Inc., Nicholas Woodman, corrupt law firm
5 Bartko Zankel Bunzel Miller, and DOES 1-10 have all willfully, knowingly, recklessly,
6 wantonly, maliciously, and callously committed reckless under color of law DECEIT by
7 concealing from, hiding from, failing to disclose, failing to tell, and failing to otherwise inform
8 the Superior Court of California, County of Los Angeles, Alhambra Superior Court that they
9 had information and offer criminal trial court testimony that would prove that George Gascón,
10 Victor Manuel Rodriguez, Brian MARK Rosenberg, James William Garrison, Stephanie Pearl
11 Mire, Ronald Millard Geltz, Sharon Lee Woo, Diana Maria Teran, Arisa Mattson, and DOES 1-
12 10's phony and bogus GoPro video recordings GL010586 and GL010587 were not created by
13 KING AROGANT on February 21, 2023.

14
15 376. Since May 2023 and continuing to the very day of this civil rights complaint, Defendant
16 Brian McGee, Defendant Ashley Albiento, Josiah Richard Jenkins (SBN # 332418), rogue
17 attorney An Nguyen Ruda (SBN # 215453), GoPro Inc., Nicholas Woodman, corrupt law firm
18 Bartko Zankel Bunzel Miller, and DOES 1-10 have all willfully, knowingly, recklessly,
19 wantonly, maliciously, and callously committed reckless under color of law FRAUD by using
20 unfiled and unserved criminal legal pleadings and documents to misrepresent to, lie to, trick
21 fool, manipulate, and otherwise deceive the Superior Court of California, County of Los
22 Angeles, Alhambra Superior Court so that it would believe that GoPro Inc., Nicholas Woodman,
23 and Brian McGee did not have important information and could not offer criminal trial court
24 testimony that would prove that George Gascón, Victor Manuel Rodriguez, Brian MARK
25 Rosenberg, James William Garrison, Stephanie Pearl Mire, Ronald Millard Geltz, Sharon Lee
26 Woo, Diana Maria Teran, Arisa Mattson, and DOES 1-10's phony and bogus GoPro video

27 recordings GL010586 and GL010587 were not created by KING AROGANT on February 21,
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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
2 2023.

3
4 377. Since May 2024 and continuing to the very day of this civil rights complaint, Defendant
5 Brian McGee, Defendant Ashley Albiento, Josiah Richard Jenkins (SBN # 332418), rogue
6 attorney An Nguyen Ruda (SBN # 215453), GoPro Inc., Nicholas Woodman, corrupt law firm
7 Bartko Zankel Bunzel Miller, and DOES 1-10 have all willfully, carelessly, knowingly,
8 recklessly, wantonly, maliciously, and callously committed reckless under color of law DUE
9 PROCESS CLAUSE violations by conspiring with a corrupt Superior Court of California
10 judicial officer and willfully, carelessly, knowingly, recklessly, wantonly, maliciously, and
11 callously failing to and refusing provide important information and offer criminal trial court
12 testimony that would prove that George Gascón, Victor Manuel Rodriguez, Brian MARK
13 Rosenberg, James William Garrison, Stephanie Pearl Mire, Ronald Millard Geltz, Sharon Lee
14 Woo, Diana Maria Teran, Arisa Mattson, and DOES 1-10's phony and bogus GoPro video
15 recordings GL010586 and GL010587 were not created by KING AROGANT on February 21,
16 2023.

17
18 378. On information and belief Defendant Brian McGee, Defendant Ashley Albiento, Josiah
19 Richard Jenkins (SBN # 332418), rogue attorney An Nguyen Ruda (SBN # 215453), GoPro
20 Inc., Nicholas Woodman, corrupt law firm Bartko Zankel Bunzel Miller, and DOES 1-10
21 conspired with Defendants Jeffrey D. Macomber. Jason D. Johnson, Jennifer Barretto,
22 Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin
23 Christopher Newsom, Robert Andres Bonta, Peter Halloran, Dennis L. Beck Jr., Leah Tamu
24 Wilson, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascon, , & DOES 1-10 to
25 recklessly violate KING AROGANT's United States Fourth and Fourteenth Amendment
26 constitutional civil rights.

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 JUDICIAL ABUSE OF PROCESS, 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
2 **I. DEFENDANT YINGCHUN CHEN COMMITTED RECKLESS UNDER**
3 **OF LAW FRAUD, RECKLESS UNDER COLOR OF LAW DECEIT AND**
4 **CONSPIRED WITH CDCR PEACE OFFICERS, CITY OF RIVERSIDE PEACE**
5 **OFFICERS AND OTHER DEFENDANTS TO VIOLATE KING AROGANT'S**
6 **FOURTEENTH AMENDMENT CONSTITUTIONAL CIVIL RIGHTS.**
7

8 379. Plaintiff KING AROGANT hereby restates, realleges, reiterates, reincorporates,
9 and incorporates by reference previous paragraphs 1-378 of this original civil rights
10 complaint.
11

12 380. No man in this country is so high that he is above the law. No officer of the law may set
13 that law at defiance of impunity. All of the officers of the government from the highest to the
14 lowest, are creatures of the law, and are bound to obey it. *United States v. Lee*, 106 U.S. 196, 1
15 S. Ct. 240, 27 L.Ed. 171 (1882) at 220
16

17 381. Defendant Yingchun Chen violated state and federal laws by committing reckless *under*
18 *color of law fraud, deceit, fraud upon the court, and reckless under color of law Due Process*
19 *Clause violations* even after they were all timely and previously served a cease-and-desist letter
20 and opt of arbitration notice.
21

22 382. On July 7, 2024, Plaintiff KING AROGANT booked a master bedroom available on
23 Airbnb Inc.'s hosting website, Airbnb.com. The total amount paid was approximately \$ 700.00.
24 The address of the Airbnb listing was 541 Bruin Drive, Riverside, CA 92507. The Airbnb host
25 was stated on the 541 Bruin Drive Airbnb listing as Yingchun Chen, and the co-host was listed
26 as James.
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 JUDICIAL ABUSE OF PROCESS, 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**

1
2 383. On July 8, 2024, KING AROGANT began moving into the 541 Bruin Drive master
3 bedroom after he and Fairchild were forced to check out an Extended Stay America hotel
4 located at 1710 Orange Tree Lane (see federal district court case **2:24-cv-01907** filed in the
5 Eastern District of California on July 11, 2024.

6
7 384. After two trips of moving in on July 8, 2024, KING AROGANT brought Fairchild with
8 him on his third trip. Since the master bedroom was located on the second story of the home.
9 KING AROGANT first carried Fairchild up nearly twenty stairsteps. KING AROGANT then
10 thoroughly cleaned the wheels of Fairchild's wheelchair so dirt from the wheels being outside
11 would not damage the home's new carpet. As soon as Defendant Han's wife Yingchun Chen
12 saw the wheelchair, she begin yelling: ***"Why did you bring that wheelchair in my home?
13 That's needed for the crippled lady. Your crippled lady must leave because this Airbnb listing
14 does not provide handicap access"***. Since Yingchun's English was poor, she used Google
15 Translate speaker so KING AROGANT could clearly hear what she said. KING AROGANT
16 could clearly hear what she said. AROGANT replied by using Google Translate to tell
17 Yingchun Chen the following on his iPhone 14 Pro Max: ***"Under federal law Airbnb must
18 provide ADA accommodations at all their listings. You are discriminating against me and my
19 fiancée Alison, and we will report you to Airbnb."***

20
21 385. On July 9, 2024, KING AROGANT filed a complaint on behalf of himself and Fairchild
22 with Airbnb by telephone, warning them that he and Fairchild would take legal action against
23 Airbnb Inc. if it continued to allow Yingchun Chen and James Han to recklessly violate their
24 constitutional civil rights by discriminating against them.

25
26 386. On July 9, 2024, KING AROGANT used his VISA ban debit card 4985 0311 7466 8034

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 JUDICIAL ABUSE OF PROCESS, 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
2 to book a reservation to continue to stay at 541 Bruin Drive, Riverside, CA 92507, from July 14,
3 2024, until July 21, 2024. In retaliation for KING AROGANT and Fairchild making a complaint
4 against them, James Han and his wife Yingchun Chen recklessly declined KING AROGANT's
5 Airbnb reservation.

6
7 387. On July 10, 2024, KING AROGANT used his VISA ban debit card 4985 0311 7466
8 8034 to book a reservation to continue to stay at 541 Bruin Drive, Riverside, CA 92507, from
9 July 14, 2024, until July 21, 2024. In retaliation for KING AROGANT and Fairchild making a
10 complaint against them, James Han and his wife Yingchun Chen recklessly declined KING
11 AROGANT's Airbnb reservation.

12
13 388. Fed up with Yingchun Chen and James Han willfully, knowingly, careless, recklessly,
14 wantonly, maliciously, and callously canceling his and Fairchild's July 10, 2024 reservation.
15 KING AROGANT told Han in person that he would pay him \$ 1,200 a month to stay in the
16 home's master bedroom until he had regained possession of his partially owned home located at
17 13732 Runnymede Street, Van Nuys, CA 91405. KING AROGANT's monthly rental payment
18 offer was based on KING AROGANT speaking to a young Chinese lady visiting the home, who
19 told KING AROGANT that Han offered to rent a bedroom to her for \$ 900.00 per month. Thus,
20 KING AROGANT's offer of \$ 1,200 a month for occupancy of the master bedroom was a fair
21 price for rent. Han declined to rent to KING AROGANT and Fairchild. Han's actions,
22 misdoings, misdeeds, misconduct, and transgressions of recklessly refusing to rent to KING
23 AROGANT and Fairchild willfully, recklessly, wantonly, maliciously, and callously violated
24 the California Fair Housing Act and the separately enacted Fair Housing Act (42 U.S.C. § 3601,
25 *et seq*) because KING AROGANT and Fairchild are disabled, because KING AROGANT is
26 African-American, and because the young Chinese girl Han agreed to rent to was the same race

27 as Han and non-handicapped. Han is clearly guilty of willful, wanton, reckless, malicious, and
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 callous violation of California state and federal housing discrimination. As a licensed real estate
2 agent for Coldwell Banker in Victorville, California, he knew his actions were illegal and
3 unconstitutional.

4
5 389. Fed up with Yingchun Chen, Airbnb's executives, and James Han's reckless, willful,
6 wanton, malicious, and callous racial bias, racial discrimination, disability bias, and disability
7 discrimination on July 10, 2024, KING AROGANT personally served James Han and his wife
8 Yingchun Chen with a Cease-and-Desist Letter that commanded them to immediately cease and
9 desist violating KING AROGANT and Fairchild's constitutional civil rights. See now the
10 Cease-and-Desist Letter attached as Exhibit ____ of KING AROGANT's Verified Appendix of
11 Exhibits.

12
13 390. Fed up with Yingchun Chen, Airbnb's executives, and James Han's reckless, willful,
14 wanton, malicious, knowing, careless, and callous racial bias, racial discrimination, disability
15 bias, and disability discrimination on July 10, 2024, KING AROGANT personally served James
16 Han and his wife Yingchun Chen with an opt-out arbitration legal document that was over
17 fifteen pages and included case law citations.

18
19 391. On July 10, 2024, KING AROGANT emailed a copy of his and Fairchild's Cease-and-
20 Desist Letter and opt-out arbitration to James Han's work email addresses of
21 jameshan@kungfutea.com and jameshan@kfteausa.com

22
23 392. On July 10, 2024, AROGANT served Defendant James Han a physical copy of his and
24 Fairchild's Cease-and-Desist Letter and Opt-Out Arbitration by mailing said legal documents by
25 United States Postal Service Priority Mail with Certified Mail and Return Receipt. James Han's
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 JUDICIAL ABUSE OF PROCESS, 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 Cease-and-Desist Letter and Opt-Out Arbitration mailing was properly addressed to:

2 **James Han**
3 **541 Bruin Drive**
4 **Riverside, CA 92507**

5
6 393. Paragraphs 379-392 prove by clear and convincing evidence that Defendant Yingchun
7 Chen received FAIR NOTICE prior to her July 11, 2024, misconduct that she would be held
8 legally liable and accountable for willfully, knowingly, carelessly, recklessly, wantonly,
9 maliciously, and callously violating KING AROGANT's constitutional civil rights.

10
11 394. On July 10, 2024, at approximately 4 PM and just one hour after being personally served
12 a cease and desist letter, Defendant Yingchun Chen recklessly contacted the city of Riverside
13 police and requested that KING AROGANT and his fiancée Alison Helen Fairchild be
14 physically removed from her home for trespassing. The responding city of Riverside peace
15 officers sided with Fairchild who they spoke with thoroughly. Prior to city of Riverside peace
16 officers departing, they told Yingchun Chen that KING AROGANT and Fairchild were tenants
17 and that she would have to go through the judicial eviction process to remove them from her
18 home located at 541 Bruin Drive, Riverside, CA 92507.

19
20 395. In the early morning of July 11, 2024, KING AROGANT filed a telephonic complaint
21 with the city of Riverside business license department against James Han and Yingchun Chen
22 that they had recklessly violated city of Riverside municipal code laws by fabricating lies and
23 falsifying information on their frivolous and invalid city of Riverside, California business
24 license that incorporated airplane parts corporation SZ Venture Air (created in 1994) was a
25 short-term rental business, a lessor of residential buildings and dwellings, and an operator of
26 residential hotels. Since Defendant Yingchun Chen's husband James (Jimmy) Han is a licensed

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 JUDICIAL ABUSE OF PROCESS, 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 real estate salesperson for Coldwell Banker (CalRE # 02222105), Yingchun Chen and James
2 (Jimmy) Han knowingly falsified real estate property information on their city of Riverside
3 business license with full competency and knowledge of what they were doing, and knowing
4 what they were doing was a form of real estate fraud.

5
6 396. On July 11, 2024, at approximately 3:20 PM Defendant Yingchun Chen recklessly
7 retaliated against KING AROGANT for filing complaints with Airbnb and city of Riverside by
8 call city of Riverside 911 emergency dispatch and telling 911 operators that KING AROGANT
9 had physically pushed her. Upon arriving KING AROGANT showed city of Riverside peace
10 officers a GoPro video recording of the incident that did not show KING AROGANT physically
11 pushing Yingchun Chen. After city of Riverside peace officer Andrew Liss told Yingchun Chen
12 that KING AROGANT's GoPro camera video recording did not show him physically assaulting
13 her. Yingchun Chen then replied by telling peace officer Andrew Liss that the reason why KING
14 AROGANT's GoPro video recording did not show him physically pushing her was because
15 KING AROGANT had pushed her before he started his GoPro camera, hmmm sounds a lot of
16 frivolous criminal Superior Court of California case GA114055.

17
18 397. James (Jimmy) Han and Defendant Yingchun Chen, at approximately 3:40 PM, told the
19 city of Riverside peace officers Andrew Liss and Anthony Lizarraga that they wanted KING
20 AROGANT and Fairchild trespassed and removed from the master bedroom because they were
21 operating and managing a licensed Airbnb short-term rental at 541 Bruin Drive, Riverside, CA
22 92507. James (Jimmy) Han and Defendant Yingchun Chen told city of Riverside peace officers
23 that Airbnb had cancelled KING AROGANT and Fairchild's reservation. Yingchun Chen and
24 her real estate husband, James (Jimmy) Han, told City of Riverside peace officers Andrew Liss
25 and Anthony Lizarraga that since Airbnb had canceled KING AROGANT and Fairchild's
26 Airbnb reservation, they were now trespassing because they were both required to vacate

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

1 Defendant Yingchun Chen and James (Jimmy) Han's master bedroom immediately. Airbnb
2 could not legally cancel KING AROGANT and Fairchild's Airbnb reservations and remove
3 them from their master bedroom based on a faulty and invalid city of Riverside business license.

4
5 398. On July 11, 2024, at approximately 2:15 PM KING AROGANT and Fairchild told the
6 city of Riverside peace officers Andrew Liss and Anthony Lizarraga that Yingchun Chen and
7 James Han were running an illegal Airbnb listing based on them having a faulty and falsified
8 business license that stated that SZ Air Venture Inc. was running a short-term rental business
9 located at 541 Bruin Drive, Riverside, CA 92507. KING AROGANT and Fairchild showed city
10 of Riverside peace officers Andrew Liss and Anthony Lizarraga certified California Secretary of
11 State records that proved the Air in SZ Air Venture Inc. did not stand for Airbnb. KING
12 AROGANT and Fairchild showed the city of Riverside peace officers Andrew Liss and
13 Anthony Lizarraga certified California Secretary of State records that proved SZ Air Venture
14 Inc. was an airplane parts company, not a short-term rental business. KING AROGANT and
15 Fairchild also told the city of Riverside peace officers in addition to the faulty and falsified
16 unlicensed city of Riverside short-term rental Airbnb listing that pursuant to California Civil
17 Code § 1946.5, they could not be removed from their master bedroom except by way of a
18 judicial eviction proceeding. KING AROGANT and Fairchild showed city of Riverside peace
19 officers Andrew Liss and Anthony Lizarraga printed pages from the County of Orange,
20 California Sheriff's Department (There is an Orange County also in North Carolina and Florida)
21 website that stated if there were two lodgers in a room, those lodgers could only be removed by
22 an eviction proceeding.

23
24 399. On July 11, 2024, at approximately 3 PM, city of Riverside peace officers Andrew Liss
25 and Anthony Lizarraga willfully, carelessly, knowingly, recklessly, wantonly, maliciously, and
26 callously falsely arrested KING AROGANT for violation of California Penal Code § 242 based

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 JUDICIAL ABUSE OF PROCESS, 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 on Yingchun Chen's fabricated police statements that KING AROGANT pushed her. Yingchun
2 Chen is a liar, and a liar never tells the same story twice. This fact is true as Yingchun Chen told
3 the police that KING AROGANT pushed her before the GoPro video recording began. But this
4 new story was only told to law enforcement after KING AROGANT had presented his GoPro
5 video recording to city of Riverside peace officers on July 11, 2024.

6
7 400. On July 11, 2024, at approximately 3:15 PM, city of Riverside peace officer Andrew Liss
8 placed KING AROGANT in his marked police vehicle. After securing KING AROGANT in his
9 police vehicle, he immediately returned to 541 Bruin Drive, Riverside, CA 92507, to speak
10 further with James (Jimmy) Han and Defendant Yingchun Chen. City of Riverside, California,
11 peace officer Andrew Liss told James (Jimmy) Han and Yingchun Chen that he could not
12 legally trespass and remove KING AROGANT and Fairchild because they were legally in
13 possession of their master bedroom. City of Riverside peace officer Andrew Liss declined and
14 refused to trespass and remove Fairchild even though both James (Jimmy) Han and Yingchun
15 Chen were willing and anxious to sign a private citizen's arrest for Fairchild allegedly violating
16 California Penal Code § 602 by refusing to leave James (Jimmy) Han and Yingchun Chen's
17 illegally operated and unlicensed Airbnb listing.

18
19 401. On July 11, 2024, city of Riverside peace officer Andrew Liss told James (Jimmy) Han
20 and Defendant Yingchun Chen that the dispute over who has possession of the master bedroom
21 was a civil matter and that they must go through the Superior Court and obtain a judicial
22 eviction court order to remove Fairchild and KING AROGANT from their master bedroom. On
23 July 11, 2024, city of Riverside peace officer Andrew Liss declined and refused to execute a
24 private person's arrest of KING AROGANT and Alison Helen Fairchild for trespassing at the
25 request of James (Jimmy) Han and Defendant Yingchun Chen.

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 JUDICIAL ABUSE OF PROCESS, 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**

1 402. On July 11, 2024, city of Riverside peace officers Andrew Liss and Anthony Lizarraga
2 refused to trespass and remove KING AROGANT and Fairchild from their master bedroom for
3 the following reasons:

- 4
- 5 1. KING AROGANT and Fairchild had shown city of Riverside peace officers Liss and
6 Lizarraga that James (Jimmy) Han (CalRE # 02222105) and Defendant Yingchun Chen
7 had a faulty, shady, bogus, and phony city of Riverside short-term business license.
8
 - 9 2. KING AROGANT and Fairchild had shown city of Riverside peace officers Liss and
10 Lizarraga certified California Secretary of State records that proved that SZ Air Venture
11 Inc. was an airplane parts company, not a short-term rental business, that SZ Air Venture
12 was incorporated nearly ten years prior to James (Jimmy) Han and Yingchun
13 Chen ever purchasing the home in which they were using to conduct their illegal Airbnb
14 short-term rental business, which proved that James (Jimmy) Han and Yingchun Chen
15 fabricated lies and falsified their city of Riverside business license application and were
16 illegally operating an Airbnb listing within the city of Riverside, California.
17
 - 18 3. KING AROGANT and Fairchild had shown city of Riverside peace officers Liss and
19 Lizarraga printed pages from the County of Orange, California Sheriff's Department that
20 stated the lodgers could only be removed by eviction.
21

22 403. On July 11, 2024 Defendant Yingchun Chen committed reckless under color of law
23 FRAUD by her and through illegal acts, actions, misconduct, misdeeds, misdoings, and
24 transgressions of willfully, knowingly, carelessly, wantonly, maliciously, recklessly, and
25 callously mispresenting to, lying to, manipulating, tricking, and fabricating lies that KING
26 AROGANT pushed her. Which was reckless under color of law FRAUD done by Defendant
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 JUDICIAL ABUSE OF PROCESS, 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**

1 Yingchun Chen for the unlawful purpose of recklessly violating the United States Constitution
2 and recklessly violating KING AROGANT's Fourteenth Amendment and Fourth Amendment
3 constitutional civil rights by getting KING AROGANT arrested based on perjurious fabricated
4 lies that KING AROGANT pushed her, and by recklessly interfering with KING AROGANT's
5 Fourteenth Amendment Due Process Clause constitutional civil rights by interfering with and
6 dispossessing him of real property located at 541 Bruin Drive, Riverside, CA 92501. Which all
7 done illegally by Defendant Yingchun Chen by her doing, by using, by her manipulating, by her
8 employing, and by her otherwise engaging in illusory and manipulated illegal acts of deceit,
9 deception, concealment, fraud, and corruption so that she could gain an unfair, unjust, illegal,
10 unlawful and unconstitutional advantage over KING AROGANT.

11
12 404. On July 11, 2024 Defendant Yingchun Chen committed reckless under color of law
13 DECEIT by her and through illegal acts, actions, misconduct, misdeeds, misdoings, and
14 transgressions of willfully, knowingly, carelessly, wantonly, maliciously, recklessly, and
15 callously concealing from, hiding from, failing to tell, failing to disclose, and failing to
16 otherwise tell city of Riverside police department peace officers and 911 dispatch employees
17 that the reason why she had called 911 and the reason why she wanted KING AROGANT
18 arrested was so that she could illegally remove KING AROGANT from a master bedroom he
19 was in legal possession of as was told to Yingchun Chen by a city of Riverside peace officer just
20 one day prior (on July 10, 2024), and not because KING AROGANT pushed her. Which was
21 reckless under color of law DECEIT done by Defendant Yingchun Chen for the unlawful
22 purpose of recklessly violating the United States Constitution and recklessly violating KING
23 AROGANT's Fourteenth Amendment and Fourth Amendment constitutional civil rights by
24 getting KING AROGANT arrested based on perjurious fabricated lies that KING AROGANT
25 pushed her, and by recklessly interfering with KING AROGANT's Fourteenth Amendment Due
26 Process Clause constitutional civil rights by interfering with and dispossessing him of real

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 JUDICIAL ABUSE OF PROCESS, 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**

1 property located at 541 Bruin Drive, Riverside, CA 92501. Which all done illegally by
2 Defendant Yingchun Chen by her doing, by using, by her manipulating, by her employing, and
3 by her otherwise engaging in illusory and manipulated illegal acts of deceit, deception,
4 concealment, fraud, and corruption so that she could gain an unfair, unjust, illegal, unlawful and
5 unconstitutional advantage over KING AROGANT.

6
7 405. On Monday, July 15, 2024, County of Riverside District Attorney's Office declined to
8 criminally charge KING AROGANT for allegedly battering, lying, and racist Defendant
9 Yingchun Chen for violation of California Penal Code § 242.

10
11 406. On information and belief between July 11, 2024 and August 5, 2024 through secretive
12 electronic mail communication and telephone conversations, Defendant Yingchun Chen
13 conspired with CDCR peace officer Jesse Ochoa, CDCR peace officer Tiffany Johnson, CDCR
14 peace officer Fernando Cortez, city of Riverside peace officer Andrew Liss; and Defendants
15 Jeffrey D. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher
16 Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres
17 Bonta, Peter Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, and DOES 1-10 to recklessly
18 violate KINGA AROGANT's Fourth and Fourteenth Amendment constitutional civil rights.

19
20 407. Due to the Superior Court of California, County of Los Angeles system being hacked
21 CDCR peace officer did not complete and send his CDCR parole violation report to the Bauchet
22 Superior Court until on or about July 30, 2024. In his detailed parole violation report, he stated
23 the following:

24
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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 JUDICIAL ABUSE OF PROCESS, 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 property located at 541 Bruin Drive, Riverside, CA 92501. Which all done illegally by
2 Defendant Yingchun Chen by her doing, by using, by her manipulating, by her employing, and
3 by her otherwise engaging in illusory and manipulated illegal acts of deceit, deception,
4 concealment, fraud, and corruption so that she could gain an unfair, unjust, illegal, unlawful and
5 unconstitutional advantage over KING AROGANT.

6
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8 criminally charge KING AROGANT for allegedly battering, lying, and racist Defendant
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17 Bonta, Peter Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, and DOES 1-10 to recklessly
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21 CDCR peace officer did not complete and send his CDCR parole violation report to the Bauchet
22 Superior Court until on or about July 30, 2024. In his detailed parole violation report, he stated
23 the following:

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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 JUDICIAL ABUSE OF PROCESS, 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 ***On 07/11/2024, Hollywood was arrested by the Riverside Police Department for Los***
2 ***Angeles County Warrant # 24CAPH03364, and Penal Code 242-Assault and Battery.***
3 ***Hollywood remains in custody at the Riverside Jail under booking # 2024298876***
4

5 See a true and correct copy of page three of CDCR peace officer Fernando Cortez's parole
6 violation report attached as Exhibit _____ of KING AROGANT's Verified Appendix of Exhibits
7 and also below.

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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

STATE OF CALIFORNIA
PAROLE VIOLATION DECISION MAKING INSTRUMENT
 CDCR 1500 (REV. 04/22)

DEPARTMENT OF CORRECTIONS AND REHABILITATION
 DIVISION OF ADULT PAROLE OPERATIONS
 Page 3 of 7

PVDTS#: 1154855 RETURN TO PRISON PROCEEDING REQUIRED: Y X N PC3000.1: Y X N PC3000 (b)(4): Y X N
 CDC # PAROLEE NAME (LAST, FIRST, MI) PAROLE UNIT REGION DATE OF DISCOVERY
 BX1748 HOLLYWOOD, ARROGANT SAN GAB VAL 1 S 06/18/2024

results were negative. Hollywood's cellphone went straight to voicemail. Agent Cortez was unable to leave voice messages due to his voicemail box not being set up. Agent Cortez left a text message that stated, "You shall report to the San Gabriel Valley Parole Office located at 971 Corporate Center Drive, Pomona, California 91768. Hollywood was to report on 06/18/2024 at 0800 hours. Agent Cortez attempted to contact Hollywood by calling his girlfriend Alison Fairchild's cellphone (626-755-6442). Alison answered the phone and stated, "I'm not with Hollywood at the moment." Agent Cortez left a message for Hollywood to report to the San Gabriel Valley Parole Office located at 971 Corporate Center Drive, Pomona, California 91768 on 06/18/2024 at 0800 hours. Alison stated, "I will let him know."

On 06/18/2024, Agent Cortez exhausted all efforts in locating Hollywood and submitted a CR301 warrant and order request to the Los Angeles County Superior Court for his arrest.

On 06/18/2024, the Honorable Judicial Officer Jeffrey S. Cohen-Laurie signed and issued Los Angeles County Warrant # 24CAPH03364.

On 06/20/2024, Agent Cortez received an email from Cheryl Kaylor which stated, "On 06/19/2024, Arrogant knocked on my bedroom window then went to my front door and shoved a bunch of papers through the mail slot. He was here from about 1220 pm to 1223 pm. He captured on camera that his key didn't work. Arrogant stated, "You have been served. I'm also serving your family Chapman. You're on camera. Call the police. I'll be gone by the time they get here. If you do anything with my property, you'll be sued. You have no right to lock me out." None of the paperwork had the name Chapman on it. He left another full copy of the original suit (identical to the one I received from the process server) and the following additional docs." Cheryl also provided a photo of Hollywood at the residence.

On 07/11/2024, Hollywood was arrested by the Riverside Police Department for Los Angeles County Warrant # 24CAPH03364, and Penal Code 242 - Assault and Battery. Hollywood remains in custody at the Riverside County Jail under booking# 202429887.

C VIOLATION :
 3 Battery (without serious injury)

D CIRCUMSTANCES OF CHARGE:
 On 06/14/2024, Parolee Hollywood reviewed and refused to sign his California Department of Corrections and Rehabilitation (CDCR) 1515 Notice of Conditions Parole. Hollywood is in violation of condition #4. CRIMINAL CONDUCT: You shall not engage in conduct prohibited by law (state, federal, county, or municipal). You shall immediately inform your parole agent if you are arrested for any felony or misdemeanor crime. Be advised, your conduct, if prohibited by law, may result in parole revocation with or without a criminal conviction.

On 07/11/2024, at approximately 1600 hours, Riverside Police Department, Police Officer A. Liss #1969 responded to a radio call for " Battery on person at 541 Bruin Drive, Riverside, California 92507."

Upon his arrival Officer Liss contacted the Victim who stated, Hollywood, Arrogant rents her residence located at 541 Bruin Drive, Riverside, California 92507. Hollywood has been staying at the residence for approximately 6 days. Hollywood recently extended his stay at the Air Bed and Breakfast (Airbnb). However, today she received a notification that he canceled the new reservation. The Victim went home, thinking Hollywood would be gone from the residence. However, when she went home, she went upstairs and saw he was still in his room. The Victim began asked Hollywood why he was still in the residence if he had canceled the stay? Hollywood quickly walked toward the Victim, began yelling, and pushed her with both hands.

Officer Liss contacted Hollywood who stated, he did not push the Victim. Hollywood showed Officer Liss a video on a camera that he had been wearing on his body. While Officer Liss reviews the video, the video shows the Victim arguing with Hollywood. However, the video did not cover the beginning of the argument and was activated after the argument had already started. During the video, the Victim asks Hollywood why he pushed her. Hollywood stated, I did not push you. Hollywood insisted nothing else happened and he did not push her.

Officer Liss spoke to the Victim a second time. The Victim stated, Hollywood pushed her and then shortly after, turned on the video camera. The Victim further stated, she did not desire prosecution but wants the incident documented so she can get a restraining order and or eviction notice at a later date.

On 07/11/2024, Hollywood was arrested by the Riverside Police Department for Penal Code 242 - Battery. Hollywood remains in custody at the Riverside County Jail under booking# 202429887.

DISTRIBUTION: COPY TO PAROLE AUTHORITY COPY TO DISTRICT ATTORNEY COPY TO DEFENSE ATTORNEY COPY RETAINED IN FIELD FILE

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 JUDICIAL ABUSE OF PROCESS, 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

1 408. KING AROGANT's parole violation for violating California Penal Code § 242 resulted
2 in him being wrongfully incarcerated from July 11, 2024, until his release on August 30, 2024.
3 KING AROGANT's July 11, 2024, to August 30, 2024, wrongful incarceration was wholly
4 caused by reckless under color of law FRAUD and reckless under color of law DECEIT by
5 Defendants Cheryl Lynn Kaylor and Yingchun Chen lying to, misrepresenting to, misleading,
6 and fabricating lies to State of California peace officers and city of Riverside peace officers so
7 that they could both gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage
8 over KING AROGANT.

9
10 409. While Defendant Cheryl Lynn Kaylor is not herein sued for causing KING AROGANT's
11 wrongful July 11, 2024, until August 30, 2024, incarceration. Defendant Yingchun Chen is
12 hereby sued herein and throughout this civil rights complaint for wholly being the cause of
13 KING AROGANT being wrongful incarcerated for fifty-one to fifty-two consecutive days while
14 she was acting under color of law and while she was conspiring with CDCR peace officer Jesse
15 Ochoa, CDCR peace officer Tiffany Johnson, CDCR peace officer Fernando Cortez, city of
16 Riverside peace officer Andrew Liss; and Defendants Jeffrey D. Macomber. Jason D. Johnson,
17 Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer
18 Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Peter Halloran, Dennis L. Beck
19 Jr., Leah Tamu Wilson, and DOES 1-10.

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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 JUDICIAL ABUSE OF PROCESS, 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**

XII. PLAINTIFF AROGANT HOLLYWOOD'S REQUESTED FEDERAL CLAIMS FOR RELIEF AND STATE CAUSES OF ACTION REQUEST FOR RELIEF AGAINST PRIVATE ACTORS CHERYL LYNN KAYLOR AND YINGCHUN CHEN

FIRST FEDERAL CAUSE OF ACTION

Willful, Reckless, Wanton, Maliciously, Careless, Wanton, and Callous Violation of 42 U.S.C. § 1983, Under Color of Law Due Process Clause Constitutional Violations, Right to Due Process of Law, Fourteenth Amendment; California Constitution, Article I, §§ 7 & 26 Against Defendants George Gascón, Leo Ka Fong Lo & DOES 1-10 (Count 1-8)

410. Plaintiff Arogant Hollywood hereby restates, reincorporates, and realleges paragraphs 1-409 of this original constitutional civil rights complaint herein.

411. At all relevant times stated throughout this original constitutional civil rights complaint, Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 all acted under color of law by conspiring to recklessly violate KING AROGANT's United States Fourteenth Amendment Due Process Clause constitutional rights and California Constitution Article I, §§ 7 & 26 rights, and then actually knowingly, carelessly, recklessly, wantonly, maliciously, willfully, and callously violating KING AROGANT's Fourteenth Amendment Due Process Clause constitutional rights and California Constitution Article I, §§ 7 & 26 rights under color of law pursuant to 42 U.S.C. § 1983.

412. At all times stated herein and throughout paragraphs 1-409 of this original constitutional

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, HED, & NEGLIGENT HED

1 civil rights complaint Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 recklessly
2 violated the United States Constitution, and KING AROGANT's Fourteenth Amendment
3 constitutional civil rights while they were gainfully employed and were acting under
4 unconstitutional policies, practices, procedures, and traditions by local California municipal
5 corporation County of Los Angeles while they were all bathed, clothed, covered, and draped
6 under and in the color of law.

7
8 413. Pursuant to Defendants George Gascón and DOES 1-10's willful, knowing, careless,
9 reckless, wanton, malicious, willful, and callous violations of California Business and
10 Professions Code § 6068, State Rules of Professional Conduct Rules 3.1, 3.2, and 3.8, County of
11 Los Angeles District Attorney's Office Legal Policies and Procedures, and American Bar
12 Association Model Rules of Professional Conduct Rules 3.1, 3.2, 3.3, 3.4, 3.7, and 3.8 as alleged
13 in paragraphs 1-409 of this original civil rights complaint they are not entitled to any shape,
14 form, or type of judicial, electoral, or prosecutorial immunity.

15
16 414. The United States Constitution Amendment XIV, Section 1 provides:
17 All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are
18 citizens of the United States and of the state wherein they reside. No state shall make or enforce any
19 law which shall abridge the privileges and immunities of citizens of the United States, nor shall any
20 state deprive any person of life, liberty, or property, without due process of law, nor deny any
21 person within jurisdiction the equal protection of the laws.

22
23 415. Allegations of facts constituting a deprivation under color of state authority of a right
24 guaranteed by the Fourteenth Amendment satisfies to that extent the requirement of Rev Stat 1979
25 (42 USC 1983), giving a right of action against a person who under color of state law, custom, or
26 usage, subjects another to the deprivation of any rights, privileges, or immunities secured by the

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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NEGLIGENT IIED**

1 Federal Constitution.

2
3 416. The Reconstruction Civil Rights Acts, enacted during the 1800s and 1870s, provide the
4 right to bring an action in federal court for violations of federal civil rights by state or local
5 officials, by private persons acting in concert with the state, or, in more limited situations, by
6 private parties acting alone. The most important of these statutes is Section 1983. Section 1983
7 creates no substantive rights. Rather, it creates a vehicle for enforcing existing federal rights.

8
9 417. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
10 transgressions of Defendants George Gascón and DOES 1-10 willfully, knowingly, carelessly,
11 recklessly, wantonly, maliciously, and callously condoning and allowing rogue County of Los
12 Angeles peace officer Billy S. Khounthavong to testify falsely that phony and bogus LASD-
13 created GoPro video recordings GL010586 and GL010587 were downloaded from KING
14 AROGANT's GoPro camera violated the United States Constitution and violated KING
15 AROGANT's United States Fourteenth Amendment Due Process Clause constitutional civil
16 rights. **(Count 1)**

17
18 418. Which was reckless under color of law **Due Process Clause violation (Count 1)** done by
19 Defendants George Gascón and DOES 1-10 by them using, by them doing, by them executing,
20 by them directing, by them employing, by them manipulating, and otherwise engaging in
21 illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment,
22 fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage
23 over KING AROGANT.

24
25 419. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
26 transgressions of Defendants George Gascón and DOES 1-10 willfully, knowingly, carelessly,

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 recklessly, wantonly, maliciously, and callously condoning and allowing rogue County of Los
2 Angeles peace officer Billy S. Khounthavong to testify falsely that Jennifer Hutton-Heger's first
3 911 call commenced at 10:03 AM and ended at 10:107 AM, and Jennifer Hutton Heger's
4 second 911 call began at 10:09 AM to 10:10 AM violated the United States Constitution and
5 violated KING AROGANT's United States Fourteenth Amendment Due Process Clause
6 constitutional civil rights. **(Count 2)**

7
8 420. Which was reckless under color of law **Due Process Clause violation (Count 2)** done by
9 Defendants George Gascón and DOES 1-10 by them using, by them doing, by them executing,
10 by them directing, by them employing, by them manipulating, and otherwise engaging in
11 illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment,
12 fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage
13 over KING AROGANT.

14
15 421. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
16 transgressions of Defendants George Gascón and DOES 1-10 willfully, knowingly, carelessly,
17 recklessly, wantonly, maliciously, and callously condoning, allowing, and failing to correct the
18 perjurious and false testimony of LYING State Government witness Jennifer Hutton-Heger
19 told rogue County of Los Angeles peace officers Daniel Esqueda and Aaron D. Contreras on
20 February 21, 2023, that KING AROGANT was brandishing a knife and that these same peace
21 officers failed to recover the knife, violated the United States Constitution and violated KING
22 AROGANT's United States Fourteenth Amendment Due Process Clause constitutional civil
23 rights. **(Count 3)**

24
25 422. Which was reckless under color of law **Due Process Clause violation (Count 3)** done by
26 Defendants George Gascón and DOES 1-10 by them using, by them doing, by them executing,

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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 JUDICIAL ABUSE OF PROCESS, 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 by them directing, by them employing, by them manipulating, and otherwise engaging in
2 illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment,
3 fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage
4 over KING AROGANT.

5
6 423. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
7 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 willfully,
8 knowingly, carelessly, recklessly, wantonly, maliciously, and callously failing to turn over
9 copies of KING AROGANT's original GoPro video recordings from February 23, 2023, until
10 October 17, 2023 violated the United States Constitution and violated KING AROGANT's
11 United States Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 4)**

12
13 424. Which was reckless under color of law **Due Process Clause violation (Count 4)** done by
14 Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them doing, by
15 them executing, by them directing, by them employing, by them manipulating, and otherwise
16 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
17 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
18 unconstitutional advantage over KING AROGANT.

19
20 425. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
21 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 willfully,
22 knowingly, carelessly, recklessly, wantonly, maliciously, and callously presenting, playing, and
23 admitting into to a criminal Superior Court of California courthouse on April 4, 2023, April 5,
24 2023, and February 2, 2024 phony and bogus LASD-created GoPro video recordings GL010586
25 and GL010587, which depict and display KING AROGANT wearing different clothing than he
26 had on February 21, 2023, violated the United States Constitution and violated 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 JUDICIAL ABUSE OF PROCESS, 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.
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NEGLIGENT IED**

1 AROGANT's United States Fourteenth Amendment Due Process Clause constitutional civil
2 rights. **(Count 5)**

3
4 426. Which was reckless under color of law **Due Process Clause violation (Count 5)** done by
5 Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them doing, by
6 them executing, by them directing, by them employing, by them manipulating, and otherwise
7 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
8 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
9 unconstitutional advantage over KING AROGANT.

10
11 427. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
12 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 willfully,
13 knowingly, carelessly, recklessly, wantonly, maliciously, and callously from April 19, 2023
14 until November 23, 2024 refusing to and deliberately failing to turn over and disclose
15 digital/electronic copies of impeaching phony and bogus LASD-created GoPro video recordings
16 GL010586 and GL010587, violated the United States Constitution and violated KING
17 AROGANT's United States Fourteenth Amendment Due Process Clause constitutional civil
18 rights pursuant to *United States v. Bagley* 667, 105 S. Ct. 3375, 87 L.Ed.2d 481 (1985) **(Count**
19 **6)**

20
21 428. Which was reckless under color of law **Due Process Clause violation (Count 6)** done by
22 Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them doing, by
23 them executing, by them directing, by them employing, by them manipulating, and otherwise
24 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
25 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
26 unconstitutional advantage over KING AROGANT.

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 JUDICIAL ABUSE OF PROCESS, 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**

1 429. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
2 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 willfully,
3 knowingly, carelessly, recklessly, wantonly, maliciously, and callously between February 22,
4 2023 and March 31, 2023, tainting, tampering with, altering and manipulating KING
5 AROGANT's continuous and uninterrupted original GoPro video recording GX010586 by
6 splitting it up into LASD-created GX010586, GX010587, GX010588, and GX010589 as proven
7 by the February 15, 2023 access date on the phony GoPro video recordings, violated the United
8 States Constitution and violated KING AROGANT's United States Fourteenth Amendment Due
9 Process Clause constitutional civil rights. **(Count 7)**

10
11 430. Which was reckless under color of law **Due Process Clause violation (Count 7)** done by
12 Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them doing, by
13 them executing, by them directing, by them employing, by them manipulating, and otherwise
14 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
15 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
16 unconstitutional advantage over KING AROGANT.

17
18 431. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
19 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 willfully,
20 knowingly, carelessly, recklessly, wantonly, maliciously, and callously between February 22,
21 2023 and March 31, 2023, creating phony and bogus GoPro video recordings GL010586 and
22 GL010587 that depicted and displayed KING AROGANT shutting off his GoPro camera while
23 wearing different clothing than he had on February 21, 2023, violated the United States
24 Constitution and violated KING AROGANT's United States Fourteenth Amendment Due
25 Process Clause constitutional civil rights. **(Count 8)**

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 JUDICIAL ABUSE OF PROCESS, 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**

1 432. Which was reckless under color of law **Due Process Clause violation (Count 8)** done by
2 Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them doing, by
3 them executing, by them directing, by them employing, by them manipulating, and otherwise
4 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
5 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
6 unconstitutional advantage over KING AROGANT.

7
8 433. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
9 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 alleged
10 throughout this civil rights complaint in paragraphs 1-409 and alleged herein in Due Process
11 Clause constitutional violations Counts 1-8, were all recklessly under color of illegal acts and
12 violations of the United States Constitution done by Defendants George Gascón, Leo Ka Fong
13 Lo, and DOES 1-10 while they were all employed by the County of Los Angeles criminal
14 prosecutors and peace officers, and while they were all fully bathed, clothed, covered and
15 draped in and under color of law.

16
17 434. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
18 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 alleged
19 throughout this civil rights complaint in paragraphs 1-409 and alleged herein in Due Process
20 Clause constitutional violations Count 1-8, were all recklessly under color of law illegal acts and
21 violations of the United States Constitution done by Defendants George Gascón, Leo Ka Fong
22 Lo, and DOES 1-10 while they were all employed by the County of Los Angeles criminal
23 prosecutors and peace officers, and while they were all fully bathed, clothed, covered and
24 draped in and under color of law.

25
26 435. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, 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 JUDICIAL ABUSE OF PROCESS, 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 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 alleged
2 throughout this civil rights complaint in paragraphs 1-409 and alleged herein in Due Process
3 Clause constitutional violations Count 1-8 were all recklessly under color of law illegal acts and
4 violations of the United States Constitution done by Defendants George Gascón, Leo Ka Fong
5 Lo, and DOES 1-10 using their under color of law enforcement policy and acting pursuant to
6 illegal and unconstitutional customs, policies, practices, procedures, and traditions of the
7 regularly sued in federal district court County of Los Angeles.

8
9 436. Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10's reckless under color
10 of law illegal acts alleged throughout this civil rights complaint in paragraphs 1-409 and alleged
11 herein in Due Process Clause constitutional violations Count 1-8 were a reckless violation of the
12 United States Constitution, a reckless violation of KING AROGANT's United States Fourteenth
13 Amendment Due Process Clause constitutional civil rights, and a violation of federal law.

14
15 437. As a further direct, foreseeable, and proximate result of said wrongful reckless, wanton,
16 malicious, willful, and callous acts by Defendants George Gascón, Leo Ka Fong Lo, and DOES
17 1-10's. Plaintiff KING AROGANT has incurred attorney's fees in an amount to be determined,
18 for which Plaintiff claims a sum to be established according to proof.

19
20 438. As alleged herein, Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10's were
21 guilty of oppression and fraud, and Plaintiff KING AROGANT should recover, in addition to
22 actual damages, exemplary and punitive damages to make an example of and to punish
23 Defendants in an amount according to proof.

24
25 439. As a direct and proximate result of the negligence, recklessness, gross negligence,
26 willfulness, and wantonness as aforesaid by Defendants George Gascón, Leo Ka Fong Lo, and

27
28 **Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages,
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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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.
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NEGLIGENT IIED**

1 DOES 1-10, Plaintiff KING AROGANT sustained injuries and damages, including, without
2 limitation, embarrassment, humiliation, anxiety, depression, a complete disruption of life,
3 physical pain and suffering, emotional pain and suffering, deprivation of liberty and freedom,
4 insomnia, chest pain, inconvenience, heart palpitations, frustration, and mental anguish.

5
6 440. Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 are liable to Plaintiff
7 KING AROGANT for actual and punitive damages given their negligence, recklessness, gross
8 negligence, criminal indifference to civil obligations, and wantonness.

9
10 441. **WHEREFORE**, Plaintiff Arogant Hollywood demands judgment against Defendants
11 George Gascón, Leo Ka Fong Lo, and DOES 1-10 on the first federal claim for relief of Plaintiff
12 Arogant Hollywood's original civil rights complaint in the amount that will justly compensate
13 Plaintiff for his compensatory, general, and special damages, together with costs and attorney's
14 fees in this action.

15
16 **SECOND FEDERAL CAUSE OF ACTION**

17 **Willful, Reckless, Wanton, Maliciously, Careless, Wanton, and Callous**
18 **Violation of 42 U.S.C. § 1983, Under Color of Law Search and Seizure Clause**
19 **Constitutional Violations, Unreasonable Search and Seizure, Fourth**
20 **Amendment; California Constitution, Article I, §§ 7 & 26 Against Defendants**
21 **George Gascón, Leo Ka Fong Lo & DOES 1-10**

22 **(Count 1-5)**

23
24 442. Plaintiff Arogant Hollywood hereby restates, reincorporates, and realleges paragraphs 1-
25 441 of this original constitutional civil rights complaint herein.

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

1 443. At all relevant times stated throughout this original constitutional civil rights complaint,
2 Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 all acted under color of law by
3 conspiring to recklessly violate KING AROGANT's United States Fourth Amendment Due
4 Search and Seizure Clause constitutional rights and California Constitution Article I, §§ 7 & 26
5 rights, and then actually knowingly, carelessly, recklessly, wantonly, maliciously, willfully, and
6 callously violating KING AROGANT's Fourth Amendment Search and Seizure Clause
7 constitutional rights and California Constitution Article I, §§ 7 & 26 rights under color of law
8 pursuant to 42 U.S.C. § 1983.

9
10 444. At all times stated herein and throughout paragraphs 1-409 of this original constitutional
11 civil rights complaint Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 recklessly
12 violated the United States Constitution and KING AROGANT's Fourth Amendment
13 constitutional civil rights while they were gainfully employed and were acting under
14 unconstitutional policies, practices, procedures, and traditions by local California municipal
15 corporation County of Los Angeles while they were all bathed, clothed, covered, and draped
16 under and in the color of law.

17
18 445. Pursuant to Defendants George Gascón and DOES 1-10's willful, knowing, careless,
19 reckless, wanton, malicious, willful, and callous violations of California Business and
20 Professions Code § 6068, State Rules of Professional Conduct Rules 3.1, 3.2, and 3.8, County of
21 Los Angeles District Attorney's Office Legal Policies and Procedures, and American Bar
22 Association Model Rules of Professional Conduct Rules 3.1, 3.2, 3.3, 3.4, 3.7, and 3.8 as alleged
23 in paragraphs 1-409 of this original civil rights complaint they are not entitled to any shape,
24 form, or type of judicial, electoral, or prosecutorial immunity.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 446. The United States Constitution Amendment XIV, Section 1 provides:

2 All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are
3 citizens of the United States and of the state wherein they reside. No state shall make or enforce any
4 law which shall abridge the privileges and immunities of citizens of the United States, nor shall any
5 state deprive any person of life, liberty, or property, without due process of law, nor deny any
6 person within jurisdiction the equal protection of the laws.

7
8 447. Allegations of facts constituting a deprivation under color of state authority of a right
9 guaranteed by the Fourteenth Amendment satisfies to that extent the requirement of Rev Stat 1979
10 (42 USC 1983), giving a right of action against a person who under color of state law, custom, or
11 usage, subjects another to the deprivation of any rights, privileges, or immunities secured by the
12 Federal Constitution.

13
14 448. The Reconstruction Civil Rights Acts, enacted during the 1800s and 1870s, provide the
15 right to bring an action in federal court for violations of federal civil rights by state or local
16 officials, by private persons acting in concert with the state, or, in more limited situations, by
17 private parties acting alone. The most important of these statutes is Section 1983. Section 1983
18 creates no substantive rights. Rather, it creates a vehicle for enforcing existing federal rights.

19
20 449. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
21 transgressions of Defendants George Gascón and DOES 1-10 willfully, knowingly, carelessly,
22 recklessly, wantonly, maliciously, and callously condoning and allowing rogue County of Los
23 Angeles peace officer Billy S. Khounthavong and rogue County of Los Angeles criminal
24 prosecutor to present as evidence in a criminal Superior Court of California courtroom a phony,
25 bogus and forged search warrant affidavit which had no search warrant number on it, was
26 uncertified, unattested, unverified, and was recklessly submitted to Alhambra Superior Court,

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 Department 1 against Superior of California, County of Los Angeles, Criminal Rule 8.17,
2 violated the United States Constitution and violated KING AROGANT's United States Fourth
3 Amendment Search and Seizure Clause constitutional civil rights. **(Count 1)**

4
5 450. Which was reckless under color of law **Search and Seizure Clause violation (Count 1)**
6 done by Defendants George Gascón and DOES 1-10 by them using, by them doing, by them
7 executing, by them directing, by them employing, by them manipulating, and otherwise
8 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
9 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
10 unconstitutional advantage over KING AROGANT.

11
12 451. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
13 transgressions of Defendants George Gascón and DOES 1-10 willfully, knowingly, carelessly,
14 recklessly, wantonly, maliciously, and callously condoning and allowing rogue County of Los
15 Angeles peace officer Aaron D. Contreras and rogue County of Los Angeles criminal prosecutor
16 to present as evidence in a criminal Superior Court of California courtroom a phony, bogus and
17 forged probable cause determination affidavit which was never emailed to:
18 email4PCD@lacourt.org, was uncertified, unattested, unverified, and was recklessly submitted
19 to Alhambra Superior Court, Department 1 against Superior of California, County of Los
20 Angeles, Criminal Rule 8.17, violated the United States Constitution and violated KING
21 AROGANT's United States Fourth Amendment Search and Seizure Clause constitutional civil
22 rights. **(Count 2)**

23
24 452. Which was reckless under color of law **Search and Seizure Clause violation (Count 2)**
25 done by Defendants George Gascón and DOES 1-10 by them using, by them doing, by them
26 executing, by them directing, by them employing, by them manipulating, and otherwise

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 JUDICIAL ABUSE OF PROCESS, 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.
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NEGLIGENT IIED

1 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
2 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
3 unconstitutional advantage over KING AROGANT.

4
5 453. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
6 transgressions of Defendants George Gascón and DOES 1-10 willfully, knowingly, carelessly,
7 recklessly, wantonly, maliciously, and callously searching, copying, altering, analyzing, and
8 reviewing KING AROGANT's entirely exculpatory GoPro video recordings using a phony,
9 forged, and search warrant affidavit violated the United States Constitution and violated KING
10 AROGANT's United States Fourth Amendment Search and Seizure Clause constitutional civil
11 rights. **(Count 3)**

12
13 454. Which was reckless under color of law **Search and Seizure Clause violation (Count 3)**
14 done by Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them
15 doing, by them executing, by them directing, by them employing, by them manipulating, and
16 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
17 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
18 unconstitutional advantage over KING AROGANT.

19
20 455. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
21 transgressions of Defendants George Gascón and DOES 1-10 willfully, knowingly, carelessly,
22 recklessly, wantonly, maliciously, and callously confiscating, illegal seizing, and illegally
23 possessing KING AROGANT's GoPro camera without probable cause and by using a phony,
24 bogus, and forged search warrant affidavit to illegal seize, confiscate, and possess KING
25 AROGANT's GoPro camera, violated the United States Constitution and violated KING
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

1 AROGANT's United States Fourth Amendment Search and Seizure Clause constitutional civil
2 rights. **(Count 4)**

3
4 456. Which was reckless under color of law **Search and Seizure Clause violation (Count 4)**
5 done by Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them
6 doing, by them executing, by them directing, by them employing, by them manipulating, and
7 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
8 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
9 unconstitutional advantage over KING AROGANT.

10
11 457. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
12 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 willfully,
13 knowingly, carelessly, recklessly, wantonly, maliciously, and callously analyzing, searching,
14 copying, editing, reviewing, and manipulating KING AROGANT's GoPro video recordings
15 stored on his GoPro camera's micro SD that were all recorded prior to February 21, 2023, which
16 was done by Defendants for the unlawful purpose of finding a GoPro video recording to
17 FRAME KING AROGANT, was an unreasonable search of KING AROGANT's GoPro camera
18 video recordings recorded prior to February 21, 2023, violated the United States Constitution
19 and violated KING AROGANT's United States Fourth Amendment Search and Seizure Clause
20 constitutional civil rights. **(Count 5)**

21
22 458. Which was reckless under color of law **Search and Seizure Clause violation (Count 5)**
23 done by Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them
24 doing, by them executing, by them directing, by them employing, by them manipulating, and
25 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
26 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, 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 JUDICIAL ABUSE OF PROCESS, 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 unconstitutional advantage over KING AROGANT.

2
3 459. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
4 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 alleged
5 throughout this civil rights complaint in paragraphs 1-458 and alleged herein in Search and
6 Seizure constitutional violations Counts 1-5, were all recklessly under color of illegal acts and
7 violations of the United States Constitution done by Defendants George Gascón, Leo Ka Fong
8 Lo, and DOES 1-10 while they were all employed by the County of Los Angeles criminal
9 prosecutors and peace officers, and while they were all fully bathed, clothed, covered and
10 draped in and under color of law.

11
12 460. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
13 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 alleged
14 throughout this civil rights complaint in paragraphs 1-458 and alleged herein in Search and
15 Seizure Clause constitutional violations Count 1-5, were all recklessly under color of law illegal
16 acts and violations of the United States Constitution done by Defendants George Gascón, Leo
17 Ka Fong Lo, and DOES 1-10 while they were all employed by the County of Los Angeles
18 criminal prosecutors and peace officers, and while they were all fully bathed, clothed, covered
19 and draped in and under color of law.

20
21 461. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
22 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 alleged
23 throughout this civil rights complaint in paragraphs 1-458 and alleged herein in Search and
24 Seizure Clause constitutional violations Count 1-8 were all recklessly under color of law illegal
25 acts and violations of the United States Constitution done by Defendants George Gascón, Leo
26 Ka Fong Lo, and DOES 1-10 using their under color of law enforcement policy and acting

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 JUDICIAL ABUSE OF PROCESS, 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 pursuant to illegal and unconstitutional customs, policies, practices, procedures, and traditions of
2 the regularly sued in federal district court County of Los Angeles.

3
4 462. Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10's reckless under color of
5 law illegal acts alleged throughout this civil rights complaint in paragraphs 1-461 and alleged
6 herein in Search and Seizure Clause constitutional violations Count 1-5 were a reckless violation
7 of the United States Constitution, a reckless violation of KING AROGANT's United States
8 Fourth Amendment Search and Seizure Clause constitutional civil rights, and a violation of
9 federal law.

10
11 463. As a further direct, foreseeable, and proximate result of said wrongful reckless, wanton,
12 malicious, willful, and callous acts by Defendants George Gascón, Leo Ka Fong Lo, and DOES
13 1-10's. Plaintiff KING AROGANT has incurred attorney's fees in an amount to be determined,
14 for which Plaintiff claims a sum to be established according to proof.

15
16 464. As alleged herein, Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10's were
17 guilty of oppression and fraud, and Plaintiff KING AROGANT should recover, in addition to
18 actual damages, exemplary and punitive damages to make an example of and to punish
19 Defendants in an amount according to proof.

20
21 465. As a direct and proximate result of the negligence, recklessness, gross negligence,
22 willfulness, and wantonness as aforesaid by Defendants George Gascón, Leo Ka Fong Lo, and
23 DOES 1-10, Plaintiff KING AROGANT sustained injuries and damages, including, without
24 limitation, embarrassment, humiliation, anxiety, depression, a complete disruption of life,
25 physical pain and suffering, emotional pain and suffering, deprivation of liberty and freedom,
26 insomnia, chest pain, inconvenience, heart palpitations, frustration, and mental anguish.

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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NEGLIGENT IIED**

1 466. Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 are liable to Plaintiff
2 KING AROGANT for actual and punitive damages given their negligence, recklessness, gross
3 negligence, criminal indifference to civil obligations, and wantonness.

4
5 467. **WHEREFORE**, Plaintiff Arogant Hollywood demands judgment against Defendants
6 George Gascón, Leo Ka Fong Lo and DOES 1-10 on the second federal claim for relief of
7 Plaintiff Arogant Hollywood's original civil rights complaint in the amount that will justly
8 compensate Plaintiff for his compensatory, general, and special damages, together with costs
9 and attorney's fees in this action.

10
11 **THIRD FEDERAL CAUSE OF ACTION**

12 **Willful, Reckless, Wanton, Maliciously, Careless, Wanton, and Callous**
13 **Violation of 42 U.S.C. § 1983, Under Color of Law FRAUD, Right to Due**
14 **Process of Law, Fourteenth Amendment; California Constitution, Article I, §§**
15 **7 & 26 Against Defendants George Gascón, Leo Ka Fong Lo, Cheryl Lynn**
16 **Kaylor, Yingchun Chen, Brian McGee & DOES 1-10**
17 **(Count 1-13)**

18
19 468. Plaintiff Arogant Hollywood hereby restates, reincorporates, and realleges paragraphs 1-
20 467 of this original constitutional civil rights complaint herein.

21
22 469. At all relevant times stated and alleged throughout this original civil rights complaint,
23 private citizens Cheryl Lynn Kaylor, Brian McGee Yingchun Chen and DOES 1-10 all acted
24 under color of law by conspiring to recklessly violate KING AROGANT's Fourteenth
25 Amendment Due Process Clause constitutional rights and California Constitution Article I, §§ 7
26 & 26 rights, and then actually knowingly, carelessly, recklessly, wantonly, maliciously,

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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 willfully and callously violating KING AROGANT's Fourteenth Amendment Due Process
2 Clause constitutional rights and California Constitution Article I, §§ 7 & 26 rights under color of
3 law.

4
5 470. At all relevant times stated throughout this original constitutional civil rights complaint,
6 Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 all acted under color of law by
7 conspiring to recklessly violate KING AROGANT's United States Fourteenth Amendment Due
8 Process Clause constitutional rights and California Constitution Article I, §§ 7 & 26 rights, and
9 then actually knowingly, carelessly, recklessly, wantonly, maliciously, willfully, and callously
10 violating KING AROGANT's Fourteenth Amendment Due Process Clause constitutional rights
11 and California Constitution Article I, §§ 7 & 26 rights under color of law pursuant to 42 U.S.C.
12 § 1983.

13
14 471. At all times stated herein and throughout paragraphs 1-467 of this original constitutional
15 civil rights complaint, Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 recklessly
16 violated the United States Constitution and KING AROGANT's Fourteenth Amendment Due
17 Process Clause constitutional civil rights while they were gainfully employed and were acting
18 under unconstitutional policies, practices, procedures, and traditions by local California
19 municipal corporation County of Los Angeles while they were all bathed, clothed, covered, and
20 draped under and in the color of law.

21
22 472. Pursuant to Defendants George Gascón and DOES 1-10's willful, knowing, careless,
23 reckless, wanton, malicious, willful, and callous violations of California Business and
24 Professions Code § 6068, State Rules of Professional Conduct Rules 3.1, 3.2, and 3.8, County of
25 Los Angeles District Attorney's Office Legal Policies and Procedures, and American Bar
26 Association Model Rules of Professional Conduct Rules 3.1, 3.2, 3.3, 3.4, 3.7, and 3.8 as alleged

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 JUDICIAL ABUSE OF PROCESS, 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.
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NEGLIGENT IIED**

1 in paragraphs 1-471 of this original civil rights complaint they are not entitled to any shape,
2 form, or type of judicial, electoral, or prosecutorial immunity.

3
4 473. The United States Constitution Amendment XIV, Section 1 provides:

5 All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are
6 citizens of the United States and of the state wherein they reside. No state shall make or enforce any
7 law which shall abridge the privileges and immunities of citizens of the United States, nor shall any
8 state deprive any person of life, liberty, or property, without due process of law, nor deny any
9 person within jurisdiction the equal protection of the laws.

10
11 474. Allegations of facts constituting a deprivation under color of state authority of a right
12 guaranteed by the Fourteenth Amendment satisfies to that extent the requirement of Rev Stat 1979
13 (42 USC 1983), giving a right of action against a person who under color of state law, custom, or
14 usage, subjects another to the deprivation of any rights, privileges, or immunities secured by the
15 Federal Constitution.

16
17 475. The Reconstruction Civil Rights Acts, enacted during the 1800s and 1870s, provide the
18 right to bring an action in federal court for violations of federal civil rights by state or local
19 officials, by private persons acting in concert with the state, or, in more limited situations, by
20 private parties acting alone. The most important of these statutes is Section 1983. Section 1983
21 creates no substantive rights. Rather, it creates a vehicle for enforcing existing federal rights.

22
23 476. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
24 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 willfully,
25 knowingly, carelessly, recklessly, wantonly, maliciously, and callously mispresenting to, lying
26 to, falsely representing to, and fabricating lies and creating false evidence to a Superior 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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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NEGLIGENT IIED**

1 California criminal courthouse that KING AROGANT shut off his GoPro camera between 9:59
2 AM and 10:06 AM on February 21, 2023, by them recklessly presenting to a Superior Court of
3 California, County of Los Angeles, Alhambra Superior Court felony criminal courtroom phony
4 LASD-created and manipulated unoriginal GoPro video recordings GX010586 and GX010587
5 that depict KING AROGANT shutting off his GoPro camera wearing different clothing than he
6 had on February 21, 2023, violated the United States Constitution and violated KING
7 AROGANT's United States Fourteenth Amendment Due Process Clause constitutional civil
8 rights. **(Count 1)**

9
10 477. Which was reckless **under color of law FRAUD (Count 1)** done by Defendants George
11 Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them doing, by them executing, by
12 them directing, by them employing, by them manipulating, and otherwise engaging in illusory
13 and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
14 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
15 AROGANT.

16
17 478. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
18 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 willfully,
19 knowingly, carelessly, recklessly, wantonly, maliciously, and callously tricking, fooling,
20 manipulating, deceiving, failing to tell, and failing to inform a Superior Court of California
21 courthouse that they were fabricating lies and creating evidence that KING AROGANT shut off
22 his GoPro camera between 9:59 AM and 10:06 AM on February 21, 2023, by them recklessly
23 presenting to a Superior Court of California, County of Los Angeles, Alhambra Superior Court
24 felony criminal courtroom phony LASD-created and manipulated unoriginal GoPro video
25 recordings GX010586 and GX010587 that depict KING AROGANT shutting off his GoPro
26 camera wearing different clothing than he had on February 21, 2023, violated the United States

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 JUDICIAL ABUSE OF PROCESS, 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**

1 Constitution and violated KING AROGANT's United States Fourteenth Amendment Due
2 Process Clause constitutional civil rights. **(Count 2)**

3
4 479. Which was reckless **under color of law FRAUD (Count 2)** done by Defendants George
5 Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them doing, by them executing, by
6 them directing, by them employing, by them manipulating, and otherwise engaging in illusory
7 and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
8 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
9 AROGANT.

10
11 480. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
12 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 willfully,
13 knowingly, carelessly, recklessly, wantonly, maliciously, and callously tricking, fooling,
14 manipulating, deceiving, failing to tell, and failing to inform Carlos Anthony Jackson, Joel
15 Wyenn, Thomas Leo Sanchez, Neil Opdahl (SBN # 277596), and KING AROGANT that they
16 were fabricating lies and creating evidence that KING AROGANT shut off his GoPro camera
17 between 9:59 AM and 10:06 AM on February 21, 2023, and then recklessly presenting this false
18 evidence into a Superior Court of California, County of Los Angeles, Alhambra Superior Court
19 felony criminal courtroom in the electronic media format of Axon Enterprises Inc.'s
20 evidence.com uploaded phony LASD-created and manipulated unoriginal GoPro video
21 recordings GX010586 and GX010587 that depict KING AROGANT shutting off his GoPro
22 camera wearing different clothing than he had on February 21, 2023, violated the United States
23 Constitution and violated KING AROGANT's United States Fourteenth Amendment Due
24 Process Clause constitutional civil rights. **(Count 3)**

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 481. Which was reckless **under color of law FRAUD (Count 3)** done by Defendants George
2 Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them doing, by them executing, by
3 them directing, by them employing, by them manipulating, and otherwise engaging in illusory
4 and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
5 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
6 AROGANT.

7
8 482. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
9 transgressions of Defendants George Gascón, and DOES 1-10 willfully, knowingly, carelessly,
10 recklessly, wantonly, maliciously, and callously fabricating testimony, lying to, misleading, and
11 otherwise deceiving a Superior Court of California courthouse so that it would foolishly believe
12 that Jennifer Hutton-Heger's first 911 audio recording commenced at 10:03 AM and ended at
13 nearly 10:07 AM, violated the United States Constitution and violated KING AROGANT's
14 United States Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 4)**

15
16 483. Which was reckless **under color of law FRAUD (Count 4)** done by Defendants George
17 Gascón and DOES 1-10 by them using, by them doing, by them executing, by them directing,
18 by them employing, by them manipulating, and otherwise engaging in illusory and manipulated
19 illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and corruption to gain
20 an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING AROGANT.

21
22 484. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
23 transgressions of Defendants George Gascón and DOES 1-10 willfully, knowingly, carelessly,
24 recklessly, wantonly, maliciously, and callously by fabricating testimony, lying to, misleading,
25 and otherwise deceiving a Superior Court of California courthouse so that it would foolishly
26 believe that Jennifer Hutton-Heger's second 911 audio recording commenced between 10:09

27
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1 AM and 10:10 AM, violated the United States Constitution and violated KING AROGANT's
2 United States Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 5)**

3
4 485. Which was reckless **under color of law FRAUD (Count 5)** done by Defendants George
5 Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them doing, by them executing, by
6 them directing, by them employing, by them manipulating, and otherwise engaging in illusory
7 and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
8 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
9 AROGANT.

10
11 486. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
12 transgressions of Defendants George Gascón and DOES 1-10 willfully, knowingly, carelessly,
13 recklessly, wantonly, maliciously, and callously by creating a phony County of Los Angeles
14 Sheriff's Department Temple City police station transcript of Hutton-Heger's second 911 call
15 that falsely stated that her second 911 audio recording commenced at approximately 10:09 AM
16 and 50 seconds, which was reckless under color of law FRAUD done by Defendant Gascón for
17 the unlawful purpose of tricking, fooling, lying to, fabricating evidence, and otherwise deceiving
18 a Superior Court of California criminal courthouse so that it would foolishly believe that
19 Jennifer Hutton-Heger's second 911 audio recording commenced at approximately 10:10 A.M.
20 Defendant Gascón trial court second 911 call audio recording transcript was so phony and
21 shoddy that it appeared to have been created on Microsoft Word, violated the United States
22 Constitution and violated KING AROGANT's United States Fourteenth Amendment Due
23 Process Clause constitutional civil rights. **(Count 6)**

24
25 487. Which was reckless **under color of law FRAUD (Count 6)** done by Defendants George
26 Gascón, and DOES 1-10 by them using, by them doing, by them executing, by them directing,

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 by them employing, by them manipulating, and otherwise engaging in illusory and manipulated
2 illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and corruption to gain
3 an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING AROGANT.
4

5 488. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
6 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 willfully,
7 knowingly, carelessly, recklessly, wantonly, maliciously, and callously consenting to and
8 allowing lying County of Los Angeles criminal prosecutor Ciny Park to fabricate lies to,
9 misrepresent to, and otherwise deceive Superior Court of California, County of Los
10 Angeles, Alhambra Superior Court, Department 1 by willfully, knowingly, carelessly,
11 maliciously, wantonly, and callously telling it that there were more than one victim that
12 would testify at KING AROGANT's felony probation revocation hearing. Cindy Park
13 further deceived KING AROGANT and Department 1 by her her fabricating lies and
14 telling the Superior Court that a continuance was necessary because she had compact
15 discs of evidence to turn over to KING AROGANT. Cindy Park further committed under
16 color of law fraud and deceit when she took her Academy award nominated performance
17 to the next level by presenting to Department 1 compact discs and then fabricating lies
18 that the Superior Court should continue KING AROGANT;s felony probation hearing
19 and appoint a private investigator so KING AROGANT could review the evidence that
20 Cincy Park had allocated to her compact discs, violated the United States Constitution and
21 violated KING AROGANT's United States Fourteenth Amendment Due Process Clause
22 constitutional civil rights. **(Count 7)**
23

24 489. Which was reckless **under color of law FRAUD (Count 7)** done by Defendants George
25 Gascón and DOES 1-10 by them using, by them doing, by them executing, by them directing,
26 by them employing, by them manipulating, and otherwise engaging in illusory
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 JUDICIAL ABUSE OF PROCESS, 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 and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
2 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
3 AROGANT.

4
5 490. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
6 transgressions of Defendants Cheryl Lynn Kaylor, and DOES 1-10 willfully, knowingly,
7 carelessly, recklessly, wantonly, maliciously, and callously misrepresenting, lying to, fabricating
8 lies, and otherwise deceiving County of Los Angeles Adult Protective Services social workers
9 and employees so that they would foolishly believe that KING AROGANT had made criminal
10 threats and committed domestic violence abuse and elder abuse, which was done by Defendant
11 Kaylor for the unlawful purposes of illegally gaining possession of KING AROGANT's real
12 property without KING AROGANT being afforded and opportuned Due Process by Defendant
13 Kaylor recklessly using unfair, unjust, illegal, unlawful, and unconstitutional under color of law
14 fraud to gain an unfair advantage over KING AROGANT, violated the United States
15 Constitution and violated KING AROGANT's United States Fourteenth Amendment Due
16 Process Clause constitutional civil rights. **(Count 8)**

17
18 491. Which was reckless **under color of law FRAUD (Count 8)** done by Defendants Cheryl
19 Lynn Kaylor and DOES 1-10 by them using, by them doing, by them executing, by them
20 directing, by them employing, by them manipulating, and otherwise engaging in illusory and
21 manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
22 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
23 AROGANT.

24
25 492. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
26 transgressions of Defendants Cheryl Lynn Kaylor and DOES 1-10 willfully, knowingly,

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 carelessly, recklessly, wantonly, maliciously, and callously misrepresenting to, lying to,
2 fabricating lies, and otherwise deceiving CDCR peace officers to believe that KING
3 AROGANT had committed acts of violence and elder abuse to Kaylor so that they would
4 foolishly assist with her planned and conspired under color of law self-help eviction of
5 KING AROGANT, which was done by Kaylor for the unlawful purpose of gaining
6 possession of KING AROGANT's real property and 30% homeownership of real
7 property located at 13732 Runnymede Street, Van Nuys, CA 91405 using unfair, unjust,
8 unlawful, unconstitutional fraud methods, violated the United States Constitution and
9 violated KING AROGANT's United States Fourteenth Amendment Due Process Clause
10 constitutional civil rights. **(Count 9)**

11
12 493. Which was reckless **under color of law FRAUD (Count 9)** done by Defendants Cheryl
13 Lynn DOES 1-10 by them using, by them doing, by them executing, by them directing, by them
14 employing, by them manipulating, and otherwise engaging in illusory and manipulated illegal
15 acts of deceit, deception, fraud, conspiracies, concealment, fraud, and corruption to gain an
16 unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING AROGANT.

17
18 494. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
19 transgressions of Defendants Cheryl Lynn Kaylor and DOES 1-10 willfully, knowingly,
20 carelessly, recklessly, wantonly, maliciously, and callously fabricating lies by telling a CDCR
21 Van Nuys female peace officer that she was in the process of evicting KING AROGANT while
22 she knew this was a lie as she had not at all started the process by providing KING AROGANT
23 with a 30 or 60 day notice to vacate, and Kaylor knew she could not evict KING AROGANT
24 because he owned 30% of the real property located at 13732 Runnymede Street, Van Nuys, CA
25 91405 and was also a written signor on Kaylor's mortgage, violated the United States
26 Constitution and violated KING AROGANT's United States Fourteenth

27
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1 Amendment Due Process Clause constitutional civil rights. **(Count 10)**

2
3 495. Which was reckless **under color of law FRAUD (Count 10)** done by Defendants Cheryl
4 Lynn Kaylor and DOES 1-10 by them using, by them doing, by them executing, by them
5 directing, by them employing, by them manipulating, and otherwise engaging in illusory and
6 manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
7 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
8 AROGANT.

9
10 496. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
11 transgressions of Defendants Brian McGee and DOES 1-10 willfully, knowingly, carelessly,
12 recklessly, wantonly, maliciously, and callously misrepresenting to, lying to, misleading,
13 fabricating lies, and otherwise deceiving a criminal Superior Court of California courtroom by
14 submitting to it unfiled legal pleadings created for the unlawful purpose of recklessly violating
15 the United States Constitution, KING AROGANT's Fourteenth Amendment constitutional civil
16 rights, and to gain an unfair advantage over KING AROGANT, violated the United States
17 Constitution and violated KING AROGANT's United States Fourteenth Amendment Due
18 Process Clause constitutional civil rights. **(Count 11)**

19
20 497. Which was reckless **under color of law FRAUD (Count 11)** done by Defendants Brian
21 McGee and DOES 1-10 by them using, by them doing, by them executing, by them directing, by
22 them employing, by them manipulating, and otherwise engaging in illusory and manipulated
23 illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and corruption to gain
24 an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING AROGANT.

25
26
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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 JUDICIAL ABUSE OF PROCESS, 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**

1 498. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
2 transgressions of Defendants Yingchun Chen and DOES 1-10 willfully, knowingly, carelessly,
3 recklessly, wantonly, maliciously, and callously fabricating lies that KING AROGANT pushed
4 her. Which was reckless under color of law FRAUD done by Defendant Yingchun Chen for the
5 unlawful purpose of recklessly violating the United States Constitution and recklessly violating
6 KING AROGANT's Fourteenth Amendment and Fourth Amendment constitutional civil rights
7 by getting KING AROGANT arrested based on perjurious fabricated lies that KING
8 AROGANT pushed her, and by recklessly interfering with KING AROGANT's Fourteenth
9 Amendment Due Process Clause constitutional civil rights by interfering with and dispossessing
10 him of real property located at 541 Bruin Drive, Riverside, CA 92501, violated the United States
11 Constitution and violated KING AROGANT's United States Fourteenth Amendment Due
12 Process Clause constitutional civil rights. **(Count 12)**

13
14 499. Which was reckless **under color of law FRAUD (Count 12)** done by Defendants
15 Yingchun Chen and DOES 1-10 by them using, by them doing, by them executing, by them
16 directing, by them employing, by them manipulating, and otherwise engaging in illusory and
17 manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
18 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
19 AROGANT.

20
21 500. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
22 transgressions of Defendants Yingchun Chen and DOES 1-10 willfully, knowingly, carelessly,
23 recklessly, wantonly, maliciously, and callously lying to, misrepresenting to, misleading, and
24 fabricating lies to State of California peace officers and city of Riverside peace officers so that
25 they could both gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over
26 KING AROGANT, violated the United States Constitution and violated KING AROGANT's

27
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1 United States Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 13)**

2
3 501. Which was reckless **under color of law FRAUD (Count 13)** done by Defendants
4 Yingchun Chen and DOES 1-10 by them using, by them doing, by them executing, by them
5 directing, by them employing, by them manipulating, and otherwise engaging in illusory and
6 manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
7 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
8 AROGANT.

9
10 502. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
11 transgressions of Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 alleged
12 throughout this civil rights complaint in paragraphs 1-501 and alleged herein in under color of
13 law FRAUD Counts 1-7, were all recklessly under color of illegal acts and violations of the
14 United States Constitution done by Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-
15 10 while they were all employed by the County of Los Angeles criminal prosecutors and peace
16 officers, and while they were all fully bathed, clothed, covered and draped in and under color of
17 law.

18
19 503. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
20 transgressions of Defendants Cheryl Lynn Kaylor, Brian McGee, and Yingchun Chen, and
21 DOES 1-10 alleged throughout this civil rights complaint in paragraphs 1-502 and alleged
22 herein in under color of FRAUD Count 8-13, were all recklessly under color of law illegal acts
23 and violations of the United States Constitution done by Defendants while they were all private
24 citizens conspiring with State of California peace officers and local government public servants
25 to rcklessly violate KING AROGANT's Fourteenth Amendment Due Process Clause
26 constitutional civil rights.

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 JUDICIAL ABUSE OF PROCESS, 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**

1 504. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
2 transgressions of Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 alleged
3 throughout this civil rights complaint in paragraphs 1-501 and alleged herein in under color of
4 law FRAUD Count 1-7 were all recklessly under color of law illegal acts and violations of the
5 United States Constitution done by Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-
6 10 using their under color of law enforcement policy and acting pursuant to illegal and
7 unconstitutional customs, policies, practices, procedures, and traditions of the regularly sued in
8 federal district court County of Los Angeles.

9
10 505. Defendants George Gascón, Leo Ka Fong Lo, Cheryl Lynn Kaylor, Brian McGee,
11 Yingchun Chen and DOES 1-10's reckless under color of law illegal acts alleged throughout this
12 civil rights complaint in paragraphs 1-503 and alleged herein in under color of law FRAUD
13 Count 1-13 were a reckless violation of the United States Constitution, a reckless violation of
14 KING AROGANT's United States Fourth Amendment Search and Seizure Clause constitutional
15 civil rights, and a violation of federal law.

16
17 506. As a further direct, foreseeable, and proximate result of said wrongful reckless, wanton,
18 malicious, willful, and callous acts by Defendants George Gascón, Cheryl Lynn Kaylor,
19 Yingchun Chen, Brian McGee, Leo Ka Fong Lo, and DOES 1-10's. Plaintiff KING AROGANT
20 has incurred attorney's fees in an amount to be determined, for which Plaintiff claims a sum to
21 be established according to proof.

22
23 507. As alleged herein, Defendants George Gascón, Leo Ka Fong Lo, Cheryl Lynn Kaylor,
24 Yingchun Chen, Brian McGee, and DOES 1-10 were guilty of oppression and fraud, and
25 Plaintiff KING AROGANT should recover, in addition to actual damages, exemplary and
26 punitive damages to make an example of and to punish Defendants in an amount according to

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 JUDICIAL ABUSE OF PROCESS, 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**

1 proof.

2
3 508. As a direct and proximate result of the negligence, recklessness, gross negligence,
4 willfulness, and wantonness as aforesaid by Defendants George Gascón, Leo Ka Fong Lo,
5 Yingchun Chen, Brian McGee, Cheryl Lynn Kaylor and DOES 1-10, Plaintiff KING
6 AROGANT sustained injuries and damages, including, without limitation, embarrassment,
7 humiliation, anxiety, depression, a complete disruption of life, physical pain and suffering,
8 emotional pain and suffering, deprivation of liberty and freedom, insomnia, chest pain,
9 inconvenience, heart palpitations, frustration, and mental anguish.

10
11 509. Defendants George Gascón, Leo Ka Fong Lo, Yingchun Chen, Cheryl Lynn Kaylor,
12 Brian McGee, and DOES 1-10 are liable to Plaintiff KING AROGANT for actual and punitive
13 damages given their negligence, recklessness, gross negligence, criminal indifference to civil
14 obligations, and wantonness.

15
16 510. **WHEREFORE**, Plaintiff Arogant Hollywood demands judgment against Defendants
17 George Gascón, Leo Ka Fong Lo, Cheryl Lynn Kaylor, Brian McGee, Yingchun Chen, and
18 DOES 1-10 of the third federal claim for relief of Plaintiff Arogant Hollywood's original civil
19 rights complaint in the amount that will justly compensate Plaintiff for his compensatory,
20 general, and special damages, together with costs and attorney's fees in this action.

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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 JUDICIAL ABUSE OF PROCESS, 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**

FOURTH FEDERAL CAUSE OF ACTION

Willful, Reckless, Wanton, Maliciously, Careless, Wanton, and Callous

Violation of 42 U.S.C. § 1983, Under Color of Law DECEIT, Right to Due

Process of Law, Fourteenth Amendment; California Constitution, Article I, §§ 7

& 26 Against Defendants 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, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka

Fong Lo, George Gascón, Cheryl Lynn Kaylor, Yingchun Chen, & DOES 1-10

(Count 1-12)

511. Plaintiff Arogant Hollywood hereby restates, reincorporates, and realleges paragraphs 1-510 of this original constitutional civil rights complaint herein.

512. At all relevant times stated and alleged throughout this original civil rights complaint, private citizens Cheryl Lynn Kaylor, Ashley Albiento, Bryce Miller, Elizabeth Byers, Brian McGee, Yingchun Chen, and DOES 1-10 all acted under color of law by conspiring to recklessly violate KING AROGANT's Fourteenth Amendment Due Process Clause constitutional rights and California Constitution Article I, §§ 7 & 26 rights, and then actually knowingly, carelessly, recklessly, wantonly, maliciously, willfully and callously violating KING AROGANT's Fourteenth Amendment Due Process Clause constitutional rights and California Constitution Article I, §§ 7 & 26 rights under color of law.

513. At all relevant times stated throughout this original constitutional civil rights complaint, Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,

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1 Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Leo Ka
2 Fong Lo, and DOES 1-10 all acted under color of law by conspiring to recklessly violate KING
3 AROGANT's United States Fourteenth Amendment Due Process Clause constitutional rights
4 and California Constitution Article I, §§ 7 & 26 rights, and then actually knowingly, carelessly,
5 recklessly, wantonly, maliciously, willfully, and callously violating KING AROGANT's
6 Fourteenth Amendment Due Process Clause constitutional rights and California Constitution
7 Article I, §§ 7 & 26 rights under color of law pursuant to 42 U.S.C. § 1983.

8
9 514. At all times stated herein and throughout paragraphs 1-510 of this original constitutional
10 civil rights complaint, Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 recklessly
11 violated the United States Constitution and KING AROGANT's Fourteenth Amendment Due
12 Process Clause constitutional civil rights while they were gainfully employed and were acting
13 under unconstitutional policies, practices, procedures, and traditions by local California
14 municipal corporation County of Los Angeles while they were all bathed, clothed, covered, and
15 draped under and in the color of law.

16
17 515. At all times stated herein and throughout paragraphs 1-510 of this original constitutional
18 civil rights complaint, Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto,
19 Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin
20 Christopher Newsom, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah
21 Tamu Wilson and DOES 1-10 recklessly violated the United States Constitution and KING
22 AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights while they
23 were gainfully employed and were acting under unconstitutional policies, practices, procedures,
24 and traditions by the State of California while they were all bathed, clothed, covered, and draped
25 under and in the color of law.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 516. Pursuant to Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr.,
2 Leah Tamu Wilson, George Gascón and DOES 1-10's willful, knowing, careless, reckless,
3 wanton, malicious, willful, and callous violations of California Business and Professions Code §
4 6068, State Rules of Professional Conduct Rules 3.1, 3.2, and 3.8, County of Los Angeles
5 District Attorney's Office Legal Policies and Procedures, and American Bar Association Model
6 Rules of Professional Conduct Rules 3.1, 3.2, 3.3, 3.4, 3.7, and 3.8 as alleged
7 in paragraphs 1-510 of this original civil rights complaint they are not entitled to any shape,
8 form, or type of judicial, electoral, or prosecutorial immunity.

9
10 517. The United States Constitution Amendment XIV, Section 1 provides:
11 All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are
12 citizens of the United States and of the state wherein they reside. No state shall make or enforce any
13 law which shall abridge the privileges and immunities of citizens of the United States, nor shall any
14 state deprive any person of life, liberty, or property, without due process of law, nor deny any
15 person within jurisdiction the equal protection of the laws.

16
17 518. The involvement of a policeman, a state official, whether or not his actions were lawful
18 or authorized, in the alleged conspiracy would plainly provide the state action needed to show a
19 direct violation of petitioner's Fourteenth Amendment rights entitling her to relief under §
20 1983, and private persons involved in such a conspiracy are "acting under color" of law and
21 can be liable under § 1983, *Adickes v. S.H. Kress Co.*, 398 U.S. 144, 90 S.Ct. 1598, 26 L.Ed.2d
22 142 (1970) at 152.

23
24 519. A private company transforms into a state actor subject to the Constitution when its
25 actions are "fairly attributable to the state. *Lugar v. Edmondson Oil Co.*, 457 U.S. 922, 102 S.Ct.
26 2744, 73 L.Ed.2d 482 (1982)

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DECEIT], 42 U.S.C. § 1983 [UNDER COLOR LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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1 520. Defendants George Gascón and DOES 1-10 committed **reckless under color of law**
2 **DECEIT** by their, when their, and through their illegal acts, actions, misdeeds, wrongdoings,
3 misconduct, misbehavior, and transgressions of Defendants willfully, knowingly, carelessly,
4 recklessly, wantonly, maliciously, and callously creating a phony County of Los Angeles
5 Sheriff's Department Temple City police station transcript of Hutton-Heger's second 911 call
6 that falsely stated that her second 911 audio recording commenced at approximately 10:09 AM
7 and 50 seconds, which was reckless under color of law DECEIT done by Defendants Gascón
8 and DOES 1-10 for the unlawful purpose of tricking, fooling, lying to, fabricating evidence, and
9 otherwise deceiving a Superior Court of California criminal courthouse so that it would
10 foolishly believe that Jennifer Hutton-Heger's second 911 audio recording commenced at
11 approximately 10:10 A.M. , Defendants George Gascón and DOES 1-10's trial court second 911
12 call audio recording transcript was so phony and shoddy that it appeared to have been created on
13 Microsoft Word, violated the United States Constitution and violated KING AROGANT's
14 United States Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 1)**

15
16 521. Which was reckless **under color of law DECEIT (Count 1)** done by Defendants George
17 Gascón and DOES 1-10 by them using, by them doing, by them executing, by them directing,
18 by them employing, by them manipulating, and otherwise engaging in illusory and manipulated
19 illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and corruption to gain
20 an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING AROGANT.

21
22 522. Defendants Gavin Christopher Newsom, Leah Tamu Wilson, Robert Andres
23 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 all
24 committed **reckless under color of law DECEIT** by their, when their, and through their illegal
25 acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of
26 Defendants willfully, knowingly, carelessly, recklessly, wantonly, maliciously, and callously

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1 hiding from Superior Court of California, County of Los Angeles, Alhambra Superior
2 Court, Department 1 the fact that they had been electronically served a copy of a nearly
3 fifteen-minute GoPro video recording on November 28, 2023, that proved KING
4 AROGANT's factual innocence by clear and convincing evidence and that based on
5 KING AROGANT's newly discovered video recording evidence served upon them, they
6 all had (with the exception of Defendant Newsom) a prosecutorial duty and obligation to
7 aid and assist KING AROGANT with immediately overturning his wrongful felony
8 conviction pursuant to the **State Bar of California, Rule 3.8, Special Responsibilities of**
9 **a Prosecutor**, violated the United States Constitution and violated KING AROGANT's United
10 States Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 2)**

11
12 523. Which was reckless **under color of law DECEIT (Count 2)** done by Defendants Gavin
13 Christopher Newsom, Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran,
14 Dennis L. Beck Jr., George Gascón, and DOES 1-10 by them using, by them doing, by them
15 executing, by them directing, by them employing, by them manipulating, and otherwise
16 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
17 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
18 unconstitutional advantage over KING AROGANT.

19
20 524. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
21 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
22 Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr.,
23 George Gascón, and DOES 1-10 all committed **reckless under color of law DECEIT** by
24 their, when their, and through their illegal acts, actions, misdeeds, wrongdoings, misconduct,
25 misbehavior, and transgressions of Defendants willfully, knowingly, carelessly, recklessly,
26 wantonly, maliciously, and callously hiding from Superior Court of California, County of

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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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1 Los Angeles, Alhambra Superior Court, Department 1 the fact that they had been
2 electronically served a copy of a nearly fifteen-minute GoPro video recording on June 13,
3 2023, that proved KING AROGANT's factual innocence by clear and convincing
4 evidence and that based on KING AROGANT's newly discovered video recording
5 evidence served upon them, and Defendants Leah Tamu Wilson, Robert Andres Bonta,
6 Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and DOES 1-10 had a
7 prosecutorial duty and obligation to aid and assist KING AROGANT with immediately
8 overturning his wrongful felony conviction pursuant to the **State Bar of California, Rule**
9 **3.8, Special Responsibilities of a Prosecutor**, violated the United States Constitution and
10 violated KING AROGANT's United States Fourteenth Amendment Due Process Clause
11 constitutional civil rights. **(Count 3)**

12
13 525. Which was reckless **under color of law DECEIT (Count 3)** done by Defendants
14 Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher
15 Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Leah Tamu
16 Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George
17 Gascón, and DOES 1-10 by them using, by them doing, by them executing, by them directing,
18 by them employing, by them manipulating, and otherwise engaging in illusory and manipulated
19 illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and corruption to gain
20 an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING AROGANT.

21
22 526. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
23 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
24 and DOES 1-10 all committed **reckless under color of law DECEIT** by their, when their, and
25 through their illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
26 transgressions of Defendants willfully, knowingly, carelessly, recklessly, wantonly, maliciously,

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1 and callously hiding from Superior Court of California, County of Los Angeles, Alhambra
2 Superior Court, Department 1 the fact that they had been electronically served a copy of a
3 nearly fifteen-minute GoPro video recording on June 13, 2023, that proved KING
4 AROGANT's factual innocence by clear and convincing evidence and that based on
5 KING AROGANT's newly discovered video recording evidence served upon them, and
6 Defendants Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L.
7 Beck Jr., George Gascón, and DOES 1-10 had a prosecutorial duty and obligation to aid
8 and assist KING AROGANT with immediately overturning his wrongful felony
9 conviction pursuant to the **State Bar of California, Rule 3.8, Special Responsibilities of**
10 **a Prosecutor**, violated the United States Constitution and violated KING AROGANT's United
11 States Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 4)**

12
13 527. Which was reckless **under color of law DECEIT (Count 4)** done by Defendants
14 Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher
15 Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Leah Tamu
16 Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George
17 Gascón, and DOES 1-10 by them using, by them doing, by them executing, by them directing,
18 by them employing, by them manipulating, and otherwise engaging in illusory and manipulated
19 illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and corruption to gain
20 an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING AROGANT.

21
22 528. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
23 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez and DOES 1-10 all committed
24 **reckless under color of law DECEIT** by their, when their, and through their illegal acts,
25 actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants
26 willfully, knowingly, carelessly, recklessly, wantonly, maliciously, and callously failing to help

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1 KING AROGANT by immediately terminating his unconstitutional and unlawful felony
2 parole supervision, and also by Defendants concealing from, hiding, failing to disclose,
3 and failing to otherwise inform Superior Court of California, County of Los Angeles,
4 Alhambra Superior Court, Department 1 that they were all electronically served a short
5 911 audio recording that proved by clear and convincing evidence that KING
6 AROGANT never spoke a criminal threat to LYING and RACIST expert witness
7 Thomas Leo Guzman-Sanchez and that KING AROGANT was wrongfully sent to
8 California state prison and wrongfully and illegally placed on felony parole supervision,
9 violated the United States Constitution and violated KING AROGANT's United States
10 Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 5)**

11
12 529. Which was reckless **under color of law DECEIT (Count 5)** done by Defendants
13 Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher
14 Chambers, Ronald Broomfield, Jennifer Benavidez, Leah Tamu Wilson, Robert Andres
15 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-10 by them using, by them
16 doing, by them executing, by them directing, by them employing, by them manipulating, and
17 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
18 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
19 unconstitutional advantage over KING AROGANT.

20
21 530. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
22 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
23 Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr.,
24 George Gascón, and DOES 1-10 all committed **reckless under color of law DECEIT** by
25 their, when their, and through their illegal acts, actions, misdeeds, wrongdoings, misconduct,
26 misbehavior, and transgressions of Defendants willfully, knowingly, carelessly, recklessly,

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1 wantonly, maliciously, and callously hiding from Superior Court of California, County of
2 Los Angeles, Alhambra Superior Court, Department 1, the fact that they had been
3 electronically served a short 911 audio recording that proved by clear and convincing
4 evidence KING AROGANT's factual innocence, violated the United States Constitution and
5 violated KING AROGANT's United States Fourteenth Amendment Due Process Clause
6 constitutional civil rights. **(Count 6)**

7
8 531. Which was reckless **under color of law DECEIT (Count 6)** done by Defendants
9 Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher
10 Chambers, Ronald Broomfield, Jennifer Benavidez, Leah Tamu Wilson, Robert Andres
11 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-10 by them using, by them
12 doing, by them executing, by them directing, by them employing, by them manipulating, and
13 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
14 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
15 unconstitutional advantage over KING AROGANT.

16
17 532. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
18 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
19 Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr.,
20 George Gascón, and DOES 1-10 all committed **reckless under color of law DECEIT** by
21 their, when their, and through their illegal acts, actions, misdeeds, wrongdoings, misconduct,
22 misbehavior, and transgressions of Defendants willfully, knowingly, carelessly, recklessly,
23 wantonly, maliciously, and callously hiding from Superior Court of California, County of
24 Los Angeles, Alhambra Superior Court, Department 1, the fact that they had been
25 electronically served a short 911 audio recording that proved by clear and convincing
26 evidence KING AROGANT's factual innocence, violated the United States Constitution and

27
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1 violated KING AROGANT's United States Fourteenth Amendment Due Process Clause
2 constitutional civil rights. **(Count 6)**

3
4 533. Which was reckless **under color of law DECEIT (Count 6)** done by Defendants
5 Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher
6 Chambers, Ronald Broomfield, Jennifer Benavidez, Leah Tamu Wilson, Robert Andres
7 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., and DOES 1-10 by them using, by them
8 doing, by them executing, by them directing, by them employing, by them manipulating, and
9 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
10 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
11 unconstitutional advantage over KING AROGANT.

12
13 534. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
14 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
15 Leah Tamu Wilson, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr.,
16 George Gascón, and DOES 1-10 all committed **reckless under color of law DECEIT** by
17 their, when their, and through their illegal acts, actions, misdeeds, wrongdoings, misconduct,
18 misbehavior, and transgressions of Defendants willfully, knowingly, carelessly, recklessly,
19 wantonly, maliciously, and callously between November 28, 2023, and October 31, 2024,
20 recklessly concealing from, hiding from, failing to disclose, failing to tell, and otherwise
21 deceiving KING AROGANT and the Superior Court of California, County of Los
22 Angeles, Alhambra Superior Court to continue to believe that the crime of felony
23 criminal threats occurred on February 21, 2023, by them all, and each of them, recklessly
24 committing under color of neglect to duty to aid and assist KING AROGANT with
25 overturning his wrongful conviction after they were all electronically served on numerous
26 occasions clear and convincing video recording evidence that no crime occurred on

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1 February 21, 2023, and were all electronically served clear and convincing audio
2 recording evidence that KING AROGANT was wrongfully sentenced to California state
3 prison on February 2, 2024, which was all done for the unlawful purpose of recklessly
4 violating the United States Constitution and recklessly violating KING AROGANT's
5 Fourteenth Amendment Due Process Clause constitutional civil rights.

6 , violated the United States Constitution and violated KING AROGANT's United States
7 Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 7)**

8
9 535. Which was reckless **under color of law DECEIT (Count 7)** done by Jeffrey A.
10 Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers,
11 Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Leah Tamu Wilson,
12 Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., George Gascón, and
13 DOES 1-10 by them using, by them doing, by them executing, by them directing, by them
14 employing, by them manipulating, and otherwise engaging in illusory and manipulated illegal
15 acts of deceit, deception, fraud, conspiracies, concealment, fraud, and corruption to gain an
16 unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING AROGANT.

17
18 536. Defendants Cheryl Lynn Kaylor and DOES 1-10 committed **reckless under color of**
19 **law DECEIT** by their, when their, and through their illegal acts, actions, misdeeds,
20 wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully, knowingly,
21 carelessly, recklessly, wantonly, maliciously, and callously hiding from, concealing from,
22 failing to inform, failing to disclose, and otherwise deceiving CDCR peace officers that
23 KING AROGANT called the police on Kaylor and her male friend twice during the
24 month of May 2024, that in early June 2024 KING AROGANT's fiancée Fairchild sued
25 her, so that they would foolishly assist with her planned and conspired under color of law
26 self-help eviction of KING AROGANT, which was done by Kaylor for the unlawful

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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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1 purpose of gaining possession of KING AROGANT's real property and 30%
2 homeownership of real property located at 13732 Runnymede Street, Van Nuys, CA
3 91405 using unfair, unjust, unlawful, unconstitutional fraud and deceit methods, violated
4 the United States Constitution, and violated KING AROGANT's United States Fourteenth
5 Amendment Due Process Clause constitutional civil rights. **(Count 8)**

6
7 537. Which was reckless **under color of law DECEIT (Count 8)** done by Defendants Cheryl
8 Lynn Kaylor and DOES 1-10 by them using, by them doing, by them executing, by them
9 directing, by them employing, by them manipulating, and otherwise engaging in illusory and
10 manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
11 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
12 AROGANT.

13
14 538. Defendants Elizabeth Byers, Bryce Miller, and DOES 1-10 committed **reckless under**
15 **color of law DECEIT** by their, when their, and through their illegal acts, actions, misdeeds,
16 wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully, knowingly,
17 carelessly, recklessly, wantonly, maliciously, and callously concealing from, hiding from, failing
18 to disclose, failing to tell, and failing to otherwise inform the Superior Court of California,
19 County of Los Angeles, Alhambra Superior Court that they were all in possession of or had
20 immediate access to digital and/or electronic copies of phony and bogus LASD-created GoPro
21 video recordings GL010586 and GL010587 that were recklessly uploaded to Axon Enterprise
22 Inc.'s evidence.com by rogue and dishonest County of Los Angeles Sheriff's Department's
23 Fraud and Cyber Crimes Bureau's Southern California High Tech Task Force peace officers
24 between February 22, 2023, and March 31, 2023, which led to the July 11, 2024, to August 30,
25 2024, wrongful and illegal County of Los Angeles jail incarceration of KING AROGANT.
26 , violated the United States Constitution, and violated KING AROGANT's United States

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1 Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 9)**

2
3 539. Which was reckless **under color of law DECEIT (Count 9)** done by Defendants
4 Elizabeth Byers, Bryce Miller, and DOES 1-10 by them using, by them doing, by them
5 executing, by them directing, by them employing, by them manipulating, and otherwise
6 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
7 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
8 unconstitutional advantage over KING AROGANT.

9
10 540. Defendants Brian McGee and DOES 1-10 committed **reckless under color of law**
11 **DECEIT** by their, when their, and through their illegal acts, actions, misdeeds, wrongdoings,
12 misconduct, misbehavior, and transgressions of Defendants willfully, knowingly, carelessly,
13 recklessly, wantonly, maliciously, and callously concealing from, hiding from, failing to
14 disclose, failing to tell, and otherwise failing to inform a criminal Superior Court of California
15 courtroom that they had valuable information that they could had testified to that would had
16 exonerated KING AROGANT and proved that Defendants George Gascón, Victor Manuel
17 Rodriguez, Brian MARK Rosenberg, James William Garrison, Stephanie Pearl Mire, Ronald
18 Millard Geltz, Sharon Lee Woo, Diana Maria Teran, Arisa Mattson, and DOES 1-10's phony
19 and bogus LASD-created GoPro video recordings GL010586 and GL010587 were not recorded
20 and created by KING AROGANT on February 21, 2023, violated the United States
21 Constitution, and violated KING AROGANT's United States Fourteenth Amendment Due
22 Process Clause constitutional civil rights. **(Count 10)**

23
24 541. Which was reckless **under color of law DECEIT (Count 10)** done by Defendants
25 Brian McGee and DOES 1-10 by them using, by them doing, by them executing, by them
26 directing, by them employing, by them manipulating, and otherwise engaging in illusory 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 JUDICIAL ABUSE OF PROCESS, 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 manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
2 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
3 AROGANT.

4
5 542. Defendants Brian McGee and DOES 1-10 committed **reckless under color of law**
6 **DECEIT** by their, when their, and through their illegal acts, actions, misdeeds, wrongdoings,
7 misconduct, misbehavior, and transgressions of Defendants willfully, knowingly, carelessly,
8 recklessly, wantonly, maliciously, and callously concealing from, hiding from, failing to
9 disclose, failing to tell, and failing to otherwise inform the Superior Court of California, County
10 of Los Angeles, Alhambra Superior Court that they had information and offer criminal trial
11 court testimony that would prove that George Gascón, Victor Manuel Rodriguez, Brian MARK
12 Rosenberg, James William Garrison, Stephanie Pearl Mire, Ronald Millard Geltz, Sharon Lee
13 Woo, Diana Maria Teran, Arisa Mattson, and DOES 1-10's phony and bogus GoPro video
14 recordings GL010586 and GL010587 were not created by KING AROGANT on February 21,
15 2023, violated the United States Constitution, and violated KING AROGANT's United States
16 Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 11)**

17
18 543. Which was **reckless under color of law DECEIT (Count 11)** done by Defendants
19 Brian McGee and DOES 1-10 by them using, by them doing, by them executing, by them
20 directing, by them employing, by them manipulating, and otherwise engaging in illusory and
21 manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
22 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
23 AROGANT.

24
25 544. Defendants Yingchun Chen and DOES 1-10 committed **reckless under color of law**
26 **DECEIT** by their, when their, and through their illegal acts, actions, misdeeds, wrongdoings,

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 JUDICIAL ABUSE OF PROCESS, 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 misconduct, misbehavior, and transgressions of Defendants willfully, knowingly, carelessly,
2 recklessly, wantonly, maliciously, and callously concealing from, hiding from, failing to tell,
3 failing to disclose, and failing to otherwise tell city of Riverside police department peace
4 officers and 911 dispatch employees that the reason why she had called 911 and the reason why
5 she wanted KING AROGANT arrested was so that she could illegally remove KING
6 AROGANT from a master bedroom he was in legal possession of as was told to Yingchun Chen
7 by a city of Riverside peace officer just one day prior (on July 10, 2024), and not because KING
8 AROGANT pushed her. Which was reckless under color of law DECEIT done by Defendant
9 Yingchun Chen for the unlawful purpose of recklessly violating the United States Constitution
10 and recklessly violating KING AROGANT's Fourteenth Amendment and Fourth Amendment
11 constitutional civil rights by getting KING AROGANT arrested based on perjurious fabricated
12 lies that KING AROGANT pushed her, and by recklessly interfering with KING AROGANT's
13 Fourteenth Amendment Due Process Clause constitutional civil rights by interfering with and
14 dispossessing him of real property located at 541 Bruin Drive, Riverside, CA 92501. , violated
15 the United States Constitution, and violated KING AROGANT's United States Fourteenth
16 Amendment Due Process Clause constitutional civil rights. **(Count 12)**

17
18 545. Which was reckless **under color of law DECEIT (Count 12)** done by Defendants
19 Yingchun Chen and DOES 1-10 by them using, by them doing, by them executing, by them
20 directing, by them employing, by them manipulating, and otherwise engaging in illusory and
21 manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, fraud, and
22 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over KING
23 AROGANT.

24
25 546. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
26 transgressions of Defendants George Gascón and DOES 1-10 alleged throughout this civil

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 JUDICIAL ABUSE OF PROCESS, 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 rights complaint in paragraphs 1-545 and alleged herein in under color of law DECEIT Counts
2 1-12, were all recklessly under color of illegal acts and violations of the United States
3 Constitution done by Defendants George Gascón and DOES 1-10 while they were all employed
4 by the County of Los Angeles criminal prosecutors and peace officers, and while they were all
5 fully bathed, clothed, covered and draped in and under color of law.

6
7 547. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
8 transgressions of Defendants George Gascón and DOES 1-10 alleged throughout this civil rights
9 complaint in paragraphs 1-545 and alleged herein in under color of law DECEIT Count 1-12
10 were all recklessly under color of law illegal acts and violations of the United States
11 Constitution done by Defendants George Gascón and DOES 1-10 using their under color of law
12 enforcement policy and acting pursuant to illegal and unconstitutional customs, policies,
13 practices, procedures, and traditions of the regularly sued in federal district court County of Los
14 Angeles.

15
16 548. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
17 transgressions of Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto,
18 Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin
19 Christopher Newsom, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah
20 Tamu Wilson and DOES 1-10 alleged throughout this civil rights complaint in paragraphs 1-545
21 and alleged herein in under color of law DECEIT Count 1-12 were all recklessly under color of
22 law illegal acts and violations of the United States Constitution done by Defendants recklessly
23 violated the United States Constitution and KING AROGANT's Fourteenth Amendment Due
24 Process Clause constitutional civil rights while they were gainfully employed and were acting
25 under unconstitutional policies, practices, procedures, and traditions by the State of California
26 while they were all bathed, clothed, covered, and draped under and in the color of law.

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 JUDICIAL ABUSE OF PROCESS, 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**

1 549. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
2 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
3 Robert Andres Bonta, Cheryl Lynn Kaylor, Ashley Albiento, Bryce Miller, Elizabeth Byers,
4 Brian McGee, Yingchun Chen, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson,
5 George Gascon, and DOES 1-10's reckless under color of law illegal acts alleged throughout
6 this civil rights complaint in paragraphs 1-545 and alleged herein in under color of law DECEIT
7 Count 1-12 were a reckless violation of the United States Constitution, a reckless violation of
8 KING AROGANT's United States Fourth Amendment Search and Seizure Clause constitutional
9 civil rights, and a violation of federal law.

10
11 550. As a further direct, foreseeable, and proximate result of said wrongful reckless, wanton,
12 malicious, willful, and callous acts by Defendants Jeffrey A. Macomber, Jason D. Johnson,
13 Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer
14 Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Cheryl Lynn Kaylor, Ashley
15 Albiento, Bryce Miller, Elizabeth Byers, Brian McGee, Yingchun Chen, Peter Dwight Halloran,
16 Dennis L. Beck Jr., Leah Tamu Wilson, George Gascon, and DOES 1-10. Plaintiff KING
17 AROGANT has incurred attorney's fees in an amount to be determined, for which Plaintiff
18 claims a sum to be established according to proof.

19
20 551. As alleged herein, Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto,
21 Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin
22 Christopher Newsom, Robert Andres Bonta, Cheryl Lynn Kaylor, Ashley Albiento, Bryce
23 Miller, Elizabeth Byers, Brian McGee, Yingchun Chen, Peter Dwight Halloran, Dennis L. Beck
24 Jr., Leah Tamu Wilson, George Gascon, and DOES 1-10 were guilty of oppression and fraud,
25 and Plaintiff KING AROGANT should recover, in addition to actual damages, exemplary and
26 punitive damages to make an example of and to punish Defendants in an amount according to

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 JUDICIAL ABUSE OF PROCESS, 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**

1 proof.

2
3 552. As a direct and proximate result of the negligence, recklessness, gross negligence,
4 willfulness, and wantonness as aforesaid by Defendants Jeffrey A. Macomber, Jason D.
5 Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield,
6 Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Cheryl Lynn Kaylor,
7 Ashley Albiento, Bryce Miller, Elizabeth Byers, Brian McGee, Yingchun Chen, Peter Dwight
8 Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, George Gascon, and DOES 1-10, Plaintiff
9 KING AROGANT sustained injuries and damages, including, without limitation,
10 embarrassment, humiliation, anxiety, depression, a complete disruption of life, physical pain and
11 suffering, emotional pain and suffering, deprivation of liberty and freedom, insomnia, chest
12 pain, inconvenience, heart palpitations, frustration, and mental anguish.

13
14 553. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
15 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
16 Robert Andres Bonta, Cheryl Lynn Kaylor, Ashley Albiento, Bryce Miller, Elizabeth Byers,
17 Brian McGee, Yingchun Chen, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson,
18 George Gascon, and DOES 1-10 are liable to Plaintiff KING AROGANT for actual and punitive
19 damages given their negligence, recklessness, gross negligence, criminal indifference to civil
20 obligations, and wantonness.

21
22 554. **WHEREFORE**, Plaintiff Arogant Hollywood demands judgment against Defendants
23 Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher
24 Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres
25 Bonta, Cheryl Lynn Kaylor, Ashley Albiento, Bryce Miller, Elizabeth Byers, Brian McGee,
26 Yingchun Chen, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, George

27
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1 Gascon, and DOES 1-10 of the fourth federal claim for relief of Plaintiff Arogant Hollywood's
2 original civil rights complaint in the amount that will justly compensate Plaintiff for his
3 compensatory, general, and special damages, together with costs and attorney's fees in this
4 action.

5
6 **FIFTH FEDERAL CAUSE OF ACTION**

7 **Willful, Reckless, Wanton, Maliciously, Careless, Wanton, and Callous**

8 **Violation of 42 U.S.C. § 1983, Under Color of Law NEGLECT TO DUTY TO AID**

9 **& ASSIST, Right to Due Process of Law, Fourteenth Amendment; California**

10 **Constitution, Article I, §§ 7 & 26 Against Defendants Robert Andres Bonta, Peter Dwight**

11 **Halloran, Dennis L Beck Jr., Leah Tamu Wilson, George Gascón, & DOES 1-10**

12 **(Count 1-6)**
13

14 555. Plaintiff Arogant Hollywood hereby restates, reincorporates, and realleges paragraphs 1-
15 554 of this original constitutional civil rights complaint herein.

16
17 556. At all relevant times stated throughout this original constitutional civil rights complaint,
18 Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu
19 Wilson, George Gascón, and DOES 1-10 all acted under color of law by conspiring to recklessly
20 violate KING AROGANT's United States Fourteenth Amendment Due Process Clause
21 constitutional rights and California Constitution Article I, §§ 7 & 26 rights, and then actually
22 knowingly, carelessly, recklessly, wantonly, maliciously, willfully, and callously violating
23 KING AROGANT's Fourteenth Amendment Due Process Clause constitutional rights and
24 California Constitution Article I, §§ 7 & 26 rights under color of law pursuant to 42 U.S.C. §
25 1983.
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, HED, & NEGLIGENT HED**

1 557. At all times stated herein and throughout paragraphs 1-510 of this original constitutional
2 civil rights complaint, Defendants George Gascón and DOES 1-10 recklessly violated the
3 United States Constitution and KING AROGANT's Fourteenth Amendment Due Process
4 Clause constitutional civil rights while they were gainfully employed and were acting under
5 unconstitutional policies, practices, procedures, and traditions by local California municipal
6 corporation County of Los Angeles while they were all bathed, clothed, covered, and draped
7 under and in the color of law.

8
9 558. At all times stated herein and throughout paragraphs 1-510 of this original constitutional
10 civil rights complaint, Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck
11 Jr., Leah Tamu Wilson, and DOES 1-10 recklessly violated the United States Constitution and
12 KING AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights
13 while they were gainfully employed and were acting under unconstitutional policies, practices,
14 procedures, and traditions by the State of California while they were all bathed, clothed,
15 covered, and draped under and in the color of law.

16
17 559. Pursuant to Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr.,
18 Leah Tamu Wilson, George Gascón, and DOES 1-10's willful, knowing, careless, reckless,
19 wanton, malicious, willful, and callous violations of California Business and Professions Code §
20 6068, State Rules of Professional Conduct Rules 3.1, 3.2, and 3.8, County of Los Angeles
21 District Attorney's Office Legal Policies and Procedures, and American Bar Association Model
22 Rules of Professional Conduct Rules 3.1, 3.2, 3.3, 3.4, 3.7, and 3.8 as alleged in paragraphs 1-
23 554 of this original civil rights complaint they are not entitled to any shape, form, or type of
24 judicial, electoral, or prosecutorial immunity.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 560. The United States Constitution Amendment XIV, Section 1 provides:

2 All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are
3 citizens of the United States and of the state wherein they reside. No state shall make or enforce any
4 law which shall abridge the privileges and immunities of citizens of the United States, nor shall any
5 state deprive any person of life, liberty, or property, without due process of law, nor deny any
6 person within jurisdiction the equal protection of the laws.

7
8 561. Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu
9 Wilson, George Gascón and DOES 1-10's committed **reckless under color of law NEGLECT**
10 **TO DUTY TO AID & ASSIST** by their, when their, and through their illegal acts, actions,
11 misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully,
12 knowingly, carelessly, recklessly, wantonly, maliciously, and callously permitting County of
13 Los Angeles District Attorney's Office employees and attorneys to violate KING
14 AROGANT's constitutional civil rights and by staying silent while condoning, tolerating,
15 acquiescing, consenting to, overlooking, permitting, and otherwise continuing to allow
16 County of Los Angeles criminal prosecutors to recklessly frame KING AROGANT for a
17 serious and violent crime he did not commit by tainting, tampering with, altering,
18 fabricating, and otherwise manipulating his exculpatory GoPro video recordings
19 evidence, violated KING AROGANT's United States Fourteenth Amendment Due Process
20 Clause constitutional civil rights. **(Count 1)**

21
22 562. Which was reckless **under color of law NEGLECT TO DUTY TO AID & ASSIST**
23 **(Count 1)** done by Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck
24 Jr., Leah Tamu Wilson, George Gascón and DOES 1-10's by them using, by them doing, by
25 them executing, by them directing, by them employing, by them manipulating, and otherwise
26 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,

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 JUDICIAL ABUSE OF PROCESS, 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, HED, & NEGLIGENT HED**

1 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
2 unconstitutional advantage over KING AROGANT.

3
4 563. Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu
5 Wilson, George Gascón and DOES 1-10's committed **reckless under color of law NEGLECT**
6 **TO DUTY TO AID & ASSIST** by their, when their, and through their illegal acts, actions,
7 misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully,
8 knowingly, carelessly, recklessly, wantonly, maliciously, and callously violating **State Bar of**
9 **California, Rule 3.8, Special Responsibilities of a Prosecutor** by being served
10 electronically video recording evidence that proved KING AROGANT's factual
11 innocence by clear and convincing evidence, and then recklessly ignoring that
12 electronically served exculpatory evidence by neglecting their legal duty and legal
13 obligation as criminal prosecutors to aid and assist KING AROGANT with overturning
14 his wrongful conviction, in direct violation of Rule 3.8., violated KING AROGANT's
15 United States Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 2)**

16
17 564. Which was reckless **under color of law NEGLECT TO DUTY TO AID & ASSIST**
18 **(Count 2)** done by Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck
19 Jr., Leah Tamu Wilson, George Gascón and DOES 1-10's by them using, by them doing, by
20 them executing, by them directing, by them employing, by them manipulating, and otherwise
21 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
22 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
23 unconstitutional advantage over KING AROGANT.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 565. Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu
2 Wilson, George Gascón and DOES 1-10 committed **reckless under color of law NEGLECT**
3 **TO DUTY TO AID & ASSIST** by their, when their, and through their illegal acts, actions,
4 misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully,
5 knowingly, carelessly, recklessly, wantonly, maliciously, and callously ignoring KING
6 AROGANT's November 28, 2023 email, violated KING AROGANT's United States
7 Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 3)**

8
9 566. Which was reckless **under color of law NEGLECT TO DUTY TO AID & ASSIST**
10 **(Count 3)** done by Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck
11 Jr., Leah Tamu Wilson, George Gascón and DOES 1-10's by them using, by them doing, by
12 them executing, by them directing, by them employing, by them manipulating, and otherwise
13 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
14 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
15 unconstitutional advantage over KING AROGANT.

16
17 567. Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu
18 Wilson, George Gascón and DOES 1-10 committed **reckless under color of law NEGLECT**
19 **TO DUTY TO AID & ASSIST** by their, when their, and through their illegal acts, actions,
20 misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully,
21 knowingly, carelessly, recklessly, wantonly, maliciously, and callously ignoring KING
22 AROGANT's January 15, 2024, email, violated the United States Constitution and
23 violated KING AROGANT's United States Fourteenth Amendment Due Process Clause
24 constitutional civil rights. **(Count 4)**

25
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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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, & NEGLIGENCE IED**

1 568. Which was reckless **under color of law NEGLECT TO DUTY TO AID & ASSIST**
2 **(Count 4)** done by Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck
3 Jr., Leah Tamu Wilson, George Gascón and DOES 1-10'sby them using, by them doing, by
4 them executing, by them directing, by them employing, by them manipulating, and otherwise
5 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
6 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
7 unconstitutional advantage over KING AROGANT.

8
9 569. Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu
10 Wilson, George Gascón and DOES 1-10 committed **reckless under color of law NEGLECT**
11 **TO DUTY TO AID & ASSIST** by their, when their, and through their illegal acts, actions,
12 misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully,
13 knowingly, carelessly, recklessly, wantonly, maliciously, and callously ignoring KING
14 AROGANT's February 28, 2024, email, violated the United States Constitution and
15 violated KING AROGANT's United States Fourteenth Amendment Due Process Clause
16 constitutional civil rights. **(Count 5)**

17
18 570. Which was reckless **under color of law NEGLECT TO DUTY TO AID & ASSIST**
19 **(Count 5)** done by Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck
20 Jr., Leah Tamu Wilson, George Gascón and DOES 1-10'sby them using, by them doing, by
21 them executing, by them directing, by them employing, by them manipulating, and otherwise
22 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
23 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
24 unconstitutional advantage over KING AROGANT.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 571. Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu
2 Wilson, George Gascón and DOES 1-10 committed **reckless under color of law NEGLECT**
3 **TO DUTY TO AID & ASSIST** by their, when their, and through their illegal acts, actions,
4 misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully,
5 knowingly, carelessly, recklessly, wantonly, maliciously, and callously failing to aid and assist
6 KING AROGANT with overturning his wrongful conviction after Defendants were
7 electronically served an audio recording by email in June 2024 that proved KING
8 AROGANT's factual innocence and proved that he was wrongfully sent to California
9 state prison, violated the United States Constitution and violated KING AROGANT's
10 United States Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 6)**
11

12 572. Which was reckless **under color of law NEGLECT TO DUTY TO AID & ASSIST**
13 **(Count 6)** done by Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck
14 Jr., Leah Tamu Wilson, George Gascón and DOES 1-10 by them using, by them doing, by them
15 executing, by them directing, by them employing, by them manipulating, and otherwise
16 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
17 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
18 unconstitutional advantage over KING AROGANT.
19

20 573. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
21 transgressions of Defendants George Gascón and DOES 1-10 alleged throughout this civil
22 rights complaint in paragraphs 1-572 and alleged herein in under color of law NEGLECT TO
23 DUTY TO AID AND ASSIST Counts 1-6, were all recklessly under color of illegal acts and
24 violations of the United States Constitution done by Defendants George Gascón and DOES 1-10
25 while they were all employed by the County of Los Angeles criminal prosecutors and while they
26 were all fully bathed, clothed, covered and draped in and under color of law.
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 JUDICIAL ABUSE OF PROCESS, 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**

1 574. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
2 transgressions of Defendants George Gascón and DOES 1-10 alleged throughout this civil rights
3 complaint in paragraphs 1-572 and alleged herein in under color of law NEGLECT TO DUTY
4 TO AID & ASSIST Count 1-6 were all recklessly under color of law illegal acts and violations
5 of the United States Constitution done by Defendants George Gascón and DOES 1-10 using
6 their under color of law enforcement policy and acting pursuant to illegal and unconstitutional
7 customs, policies, practices, procedures, and traditions of the regularly sued in federal district
8 court County of Los Angeles.

9
10 575. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
11 transgressions of Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr.,
12 Leah Tamu Wilson, and DOES 1-10 alleged throughout this civil rights complaint in paragraphs
13 1-572 and alleged herein in under color of law NEGLECT TO DUTY TO AID AND ASSIST
14 Count 1-6 were all recklessly under color of law illegal acts and violations of the United States
15 Constitution done by Defendants recklessly violated the United States Constitution and KING
16 AROGANT's Fourteenth Amendment Due Process Clause constitutional civil rights while they
17 were gainfully employed and were acting under unconstitutional policies, practices, procedures,
18 and traditions by the State of California while they were all bathed, clothed, covered, and draped
19 under and in the color of law.

20
21 576. Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu
22 Wilson, George Gascon, and DOES 1-10's reckless under color of law illegal acts alleged
23 throughout this civil rights complaint in paragraphs 1-572 and alleged herein in under color of
24 law NEGLECT TO DUTY AID AND ASSIST Count 1-6 were a reckless violation of the
25 United States Constitution, a reckless violation of KING AROGANT's United States Fourth
26 Amendment Search and Seizure Clause constitutional civil rights, and a violation of federal law.

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 JUDICIAL ABUSE OF PROCESS, 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**

1 577. As a further direct, foreseeable, and proximate result of said wrongful reckless, wanton,
2 malicious, willful, and callous acts by Defendants Robert Andres Bonta, Peter Dwight
3 Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, George Gascon, and DOES 1-10. Plaintiff
4 KING AROGANT has incurred attorney's fees in an amount to be determined, for which
5 Plaintiff claims a sum to be established according to proof.

6
7 578. As alleged herein, Defendants Robert Andres Bonta Peter Dwight Halloran, Dennis L.
8 Beck Jr., Leah Tamu Wilson, George Gascon, and DOES 1-10 were guilty of oppression and
9 fraud, and Plaintiff KING AROGANT should recover, in addition to actual damages, exemplary
10 and punitive damages to make an example of and to punish Defendants in an amount according
11 to proof.

12
13 579. As a direct and proximate result of the negligence, recklessness, gross negligence,
14 willfulness, and wantonness as aforesaid by Defendants Robert Andres Bonta, Peter Dwight
15 Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, George Gascon, and DOES 1-10, Plaintiff
16 KING AROGANT sustained injuries and damages, including, without limitation,
17 embarrassment, humiliation, anxiety, depression, a complete disruption of life, physical pain and
18 suffering, emotional pain and suffering, deprivation of liberty and freedom, insomnia, chest
19 pain, inconvenience, heart palpitations, frustration, and mental anguish.

20
21 580. Defendants Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu
22 Wilson, George Gascon, and DOES 1-10 are liable to Plaintiff KING AROGANT for actual and
23 punitive damages given their negligence, recklessness, gross negligence, criminal indifference to
24 civil obligations, and wantonness.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 581. **WHEREFORE**, Plaintiff Arogant Hollywood demands judgment against Defendants
2 Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, George
3 Gascon, and DOES 1-10 of the fifth federal claim for relief of Plaintiff Arogant Hollywood's
4 original civil rights complaint in the amount that will justly compensate Plaintiff for his
5 compensatory, general, and special damages, together with costs and attorney's fees in this
6 action.

7
8
9 **SIXTH CAUSE OF ACTION**

10 **Violation of 42 U.S.C. § 1985 [Conspiracy to Violate Civil Rights] Against Jeffrey A.**
11 **Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers,**
12 **Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres**
13 **Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Brian McGee,**
14 **Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascón, Cheryl**
15 **Lynn Kaylor, Ying Chun Chen and DOES 1-10**

16
17 582. Plaintiff KING AROGANT hereby restates, reincorporates, reiterates, realleges, and
18 incorporates by reference previous paragraphs 1-581 of this original civil rights complaint
19 herein.

20
21 583. At all relevant times stated herein and alleged throughout this original civil rights
22 complaint Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha
23 Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher
24 Newsom, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson,
25 Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George
26 Gascón, Cheryl Lynn Kaylor, and DOES 1-10 all acted under color of law by conspiring to

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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 recklessly violate KING AROGANT's Fourth Amendment Search and Seizure Clause and
2 Fourteenth Amendment Due Process Clause constitutional civil rights, and California
3 Constitution Article I, §§ 7 & 26 rights, and then actually recklessly, wantonly, maliciously,
4 willfully, and callously violating KING AROGANT's Fourth Amendment Search and Seizure
5 Clause and Fourteenth Amendment Due Process Clause constitutional rights and California
6 Constitution Article I, §§ 7 & 26 rights under color of law.

7
8 584. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
9 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
10 Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Brian
11 McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascón,
12 Cheryl Lynn Kaylor, Yingchun Chen, and DOES 1-10 had a meeting of minds, and Defendants
13 also conduct numerous secret meetings outside of the presence and personal knowledge ad
14 awareness of KING AROGANT that they would all willfully, knowingly, carelessly, wantonly,
15 maliciously, recklessly, and callously violate KING AROGANT's California Constitution
16 Article I, §§ 7 & 26, Fourth Amendment Search and Seizure Clause and Fourteenth Amendment
17 Due Process Clause constitutional civil rights under color of law with Defendants' specific
18 intent, motive, and goal of causing harm and injury to Plaintiff KING AROGANT by them all
19 recklessly interfering and depriving KING AROGANT of his constitutional civil rights.

20
21 585. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
22 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
23 Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Brian
24 McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascón,
25 Cheryl Lynn Kaylor, Yingchun Chen, and DOES 1-10 all agreed to violate KING AROGANT's
26 United States Fourth Amendment Search and Seizure Clause and Fourteenth Amendment Due

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 Process Clause constitutional civil rights, and his California Constitution Article I, §§ 7 & 26
2 rights while they all willfully, knowingly, recklessly, maliciously, carelessly, wantonly, and
3 callously acted under color of law while interfering with and depriving KING AROGANT of his
4 constitutional civil rights.

5
6 586. 42 U.S.C. § 1985 provides a remedy in damages to anyone who is injured in his person or
7 property or deprived of a federal right or privilege as a result of an act in furtherance of a
8 conspiracy prohibited under any part of Section 1985, including clause one of Section 1985 (2).
9 See 42 U.S.C. § 1985(3) (clause iii).

10
11 587. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
12 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
13 Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Brian
14 McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascón,
15 Cheryl Lynn Kaylor, Yingchun Chen, and DOES 1-10 willfully, knowingly, recklessly,
16 maliciously, carelessly, wantonly, and callously violated KING AROGANT's Fourth
17 Amendment Search and Seizure Clause and Fourteenth Amendment Due Process Clause
18 constitutional civil rights California Constitution Article I, §§ 7 & 26 rights under color of law
19 by interfering with and depriving KING AROGANT of his constitutional civil rights in
20 furtherance of Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha
21 Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher
22 Newsom, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson,
23 Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George
24 Gascón, Cheryl Lynn Kaylor, Yingchun Chen, and DOES 1-10's conspiracy to deprive KING
25 AROGANT of his constitutional civil rights by them using under color law FRAUD, under
26 color of law DECEIT, under color of law FOURTEENTH AMENDMENT

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 JUDICIAL ABUSE OF PROCESS, 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 VIOLATIONS, under color of law FOURTH AMENDMENT
2 CONSTITUTIONAL VIOLATIONS, and under color of law NEGLECT TO DUTY TO AID
3 AND ASSIST in furtherance of all Defendants' secret plans and secret meetings conducted for
4 the unlawful purpose of injuring KING AROGANT, and for the unlawful purpose of gaining
5 unfair, unjust, unlawful, unconstitutional, and illegal advantage over KING AROGANT.

6
7 588. Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss,
8 Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom,
9 Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Brian
10 McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascón,
11 Cheryl Lynn Kaylor, Yingchun Chen, and DOES 1-10's shocking and disturbing under color of
12 law constitutional violations alleged in paragraphs 1-587, recklessly violated the United States
13 Constitution, and recklessly violated KING AROGANT's constitutional civil rights, and all
14 there illegal acts, actions, misconduct, misdoings, misdeeds, and transgressions alleged in
15 paragraphs 1-587 were a violation of federal law.

16
17 589. That because of the foregoing, KING AROGANT suffered physical and psychological
18 injuries, traumatic stress, post-traumatic stress disorder, mental anguish, economic
19 damages, damage to reputation, deprivation of real property, deprivation of constitutional
20 civil rights, deprivation of liberty and freedom, embarrassment, shame, humiliation, and
21 indignity. All said injuries may be permanent.

22
23 590. As a direct and proximate result of the negligence, recklessness, gross negligence,
24 willfulness, and wantonness as aforesaid by Defendants Jeffrey A. Macomber, Jason D.
25 Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield,
26 Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Peter Dwight Halloran,

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 JUDICIAL ABUSE OF PROCESS, 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 Dennis L. Beck Jr., Leah Tamu Wilson, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth
2 Byers, Leo Ka Fong Lo, George Gascón, Cheryl Lynn Kaylor, Yingchun Chen, and DOES 1-10.
3 Plaintiff KING AROGANT sustained injuries and damages including, without limitation,
4 embarrassment, humiliation, anxiety, depression, a complete disruption of life, physical pain and
5 suffering, emotional pain and suffering, deprivation of real property, deprivation of liberty and
6 freedom, deprivation of constitutional civil rights, insomnia, chest pain, inconvenience, heart
7 palpitations, frustration, and mental anguish.

8
9 591. **WHEREFORE**, pursuant to 42 U.S.C. § 1985, Plaintiff Arogant Hollywood demands
10 actual damages, compensatory, general damages, and special damages against Defendants
11 Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher
12 Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres
13 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Brian McGee, Ashley
14 Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascón, Cheryl Lynn Kaylor,
15 Yingchun Chen, and DOES 1-10 on the sixth federal claim for relief of Plaintiff Arogant
16 Hollywood's original constitutional civil rights complaint in the amount that will justly
17 compensate Plaintiff for his compensatory, general, and special damages, together with
18 costs and attorneys' fees in this action.

19
20 **FIRST CALIFORNIA STATE CAUSE OF ACTION---NEGLIGENCE PER SE--**
21 **ALLEGED BY AROGANT HOLLYWOOD AS AGAINST DEFENDANTS BRIAN**
22 **MCGEE, ASHLEY ALBIENTO, BRYCE MILLER, ELIZABETH BYERS, CHERYL**
23 **LYNN KAYLOR, YINGCHUN CHEN, & DOES 1-10**

24
25 592. Plaintiff KING AROGANT hereby restates, reincorporates, reiterates, realleges, and
26 incorporates by reference previous paragraphs 1-591 of this original civil rights complaint

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 JUDICIAL ABUSE OF PROCESS, 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 herein.

2
3 593. At all relevant times stated and alleged throughout this original civil rights complaint,
4 private citizens Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth
5 Byers, Yingchun Chen, and DOES 1-10 all acted under color of law by conspiring to recklessly
6 violate KING AROGANT's Fourteenth Amendment Due Process Clause constitutional rights
7 and California Constitution Article I, §§ 7 & 26 rights, and then actually knowingly, carelessly,
8 recklessly, wantonly, maliciously, willfully and callously violating KING AROGANT's
9 Fourteenth Amendment Due Process Clause constitutional rights and California Constitution
10 Article I, §§ 7 & 26 rights under color of law.

11
12 594. Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth Byers,
13 Yingchun Chen, and DOES 1-10 owed Plaintiff Alison Helen Fairchild a duty of reasonable/due
14 care as well as statutory duties established by 42 U.S.C. §§ 1983 and 1985, California Civil
15 Code § 1714, the California Constitution, and the United States Constitution.

16
17 595. Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth
18 Byers, Yingchun Chen, and DOES 1-10 breached their duty of reasonable due care as well as
19 one or more duties established by 42 U.S.C. §§ 1983 and 1985, California Civil Code § 1714,
20 the California Constitution, and the United States Constitution by committing and engaging in
21 the actions, acts, misdeeds, wrongdoings, misconduct, misbehavior, transgressions, violations,
22 and misdoings alleged in paragraphs 1-594 of this original constiuttional civil rights complaint.

23
24 596. Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth
25 Byers, Yingchun Chen, and DOES 1-10 breached their duty of reasonable due care as well as
26 one or more of the duties established by 42 U.S.C. §§ 1983 and 1985, California Civil Code §

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 JUDICIAL ABUSE OF PROCESS, 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 1714, the California Constitution, and the United States Constitution. Such conduct, actions,
2 misdeeds, wrongdoings,
3

4 597. Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth
5 Byers, Yingchun Chen, and DOES 1-10's negligence proximately and actually caused Plaintiff
6 KING AROGANT to suffer severe and ongoing personal injuries and great physical, mental,
7 emotional and psychological pain and suffering, all to her general damages, compensatory
8 damages, and special damages in amount to be proved according to proof.
9

10 598. Further, as a direct and legal result of the hereinabove alleged negligence of Defendants
11 Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth Byers, Yingchun
12 Chen, and DOES 1-10, Plaintiff KING AROGANT has lost and will continue to lose real
13 property, liberty and freedom, and his constitutional civil rights, all to his special damages in an
14 amount to be determined at the time of trial herein.
15

16 599. Plaintiff KING AROGANT is informed and believes and, based on thereon, alleges that,
17 in performing the acts alleged herein, Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley
18 Albiento. Bryce Miller, Elizabeth Byers, Yingchun Chen, and DOES 1-10 acted with
19 oppression, fraud, and malice, or, alternatively, Defendants acted in such conscious disregard of
20 Plaintiff KING AROGANT's civil rights, safety, and well-being, Plaintiff is entitled to punitive
21 damages to punish Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce
22 Miller, Elizabeth Byers, Yingchun Chen, and DOES 1-10, and to deter such conduct in the
23 future, in an amount to be determined at trial.
24
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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 JUDICIAL ABUSE OF PROCESS, 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**

1 600. **WHEREFORE**, Plaintiff Arogant Hollywood demands judgment against Defendants
2 Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth Byers,
3 Yingchun Chen, and DOES 1-10 on the first California state cause of action of Plaintiff's
4 original constitutional civil rights complaint in the amount that will justly compensate Plaintiff
5 for his compensatory damages, general damages and special damages, together with costs and
6 attorney's fees in this action.

7
8
9 **SECOND CALIFORNIA STATE CAUSE OF ACTION---GENERAL NEGLIGENCE--**
10 **ALLEGED BY AROGANT HOLLYWOOD AS AGAINST DEFENDANTS BRIAN**
11 **MCGEE, ASHLEY ALBIENTO, BRYCE MILLER, ELIZABETH BYERS, CHERYL**
12 **LYNN KAYLOR, YINGCHUN CHEN, & DOES 1-10**

13
14 601. Plaintiff KING AROGANT hereby restates, reincorporates, reiterates, realleges, and
15 incorporates by reference previous paragraphs 1-600 of this original civil rights complaint
16 herein.

17
18 602. At all relevant times stated and alleged throughout this original civil rights complaint,
19 private citizens Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth
20 Byers, Yingchun Chen, and DOES 1-10 all acted under color of law by conspiring to recklessly
21 violate KING AROGANT's Fourteenth Amendment Due Process Clause constitutional rights
22 and California Constitution Article I, §§ 7 & 26 rights, and then actually knowingly, carelessly,
23 recklessly, wantonly, maliciously, willfully and callously violating KING AROGANT's
24 Fourteenth Amendment Due Process Clause constitutional rights and California Constitution
25 Article I, §§ 7 & 26 rights under color of law.

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 JUDICIAL ABUSE OF PROCESS, 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**

1 603. Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth
2 Byers, Yingchun Chen, and DOES 1-10 owed Plaintiff Fairchild a duty to act within reasonable
3 and due care.

4
5 604. Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth
6 Byers, Yingchun Chen, and DOES 1-10 breached their duty to Plaintiff KING AROGANT as
7 well as one or more of the duties established by 42 U.S.C. §§ 1983 & 1985, California Civil
8 Code § 1714, the California Constitution, and the United States Constitution by committing and
9 engaging in the illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior,
10 transgressions, violations, and misdoings alleged in paragraphs 1-600 of this original civil rights
11 complaint.

12
13 605. Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth
14 Byers, Yingchun Chen, and DOES 1-10's negligence complained of herein caused Plaintiff
15 KING AROGANT to suffer serious harm and damages.

16
17 606. Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth
18 Byers, Yingchun Chen, and DOES 1-10's conduct was a substantial factor in causing Plaintiff
19 KING AROGANT's harm and injury.

20
21 607. As a proximate result of Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley
22 Albiento, Bryce Miller, Elizabeth Byers, Yingchun Chen, and DOES 1-10's negligence, Plaintiff
23 KING AROGANT has suffered general damages, compensatory damages, and special damages
24 in amounts to be determined at trial according to proof.

25
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

1 608. Plaintiff KING AROGANT is informed and believes and, based on thereon, alleges that,
2 in performing the acts alleged herein, Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley
3 Albiento, Bryce Miller, Elizabeth Byers, Yingchun Chen, and DOES 1-10 acted with
4 oppression, fraud, and malice, or, alternatively, Defendants acted in such conscious disregard of
5 Plaintiff KING AROGANT's constitutional civil rights, safety, and well-being, Plaintiff KING
6 AROGANT is entitled to punitive damages to punish Defendants Cheryl Lynn Kaylor, Brian
7 McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Yingchun Chen, and DOES 1-10
8 , and to deter such conduct in the future, in an amount to be determined at trial.

9
10 609. **WHEREFORE**, Plaintiff Arogant Hollywood demands judgment against Defendants
11 Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Yingchun
12 Chen, and DOES 1-10 on the second California state cause of action of Plaintiff Arogant
13 Hollywood's original civil rights complaint in the amount that will justly compensate Plaintiff
14 for her compensatory damages, general damages, and special damages, together with costs and
15 attorney's fees in this action.

16
17
18 **THIRD CALIFORNIA STATE CAUSE OF ACTION--GENERAL NEGLIGENCE--**
19 **ALLEGED BY AROGANT HOLLYWOOD AS AGAINST DEFENDANTS BRIAN**
20 **MCGEE, ASHLEY ALBIENTO, BRYCE MILLER, ELIZABETH BYERS, CHERYL**
21 **LYNN KAYLOR, YINGCHUN CHEN, & DOES 1-10**

22
23 610. Plaintiff KING AROGANT hereby restates, reincorporates, reiterates, realleges, and
24 incorporates by reference previous paragraphs 1-609 of this original civil rights complaint
25 herein.

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 JUDICIAL ABUSE OF PROCESS, 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**

611. At all relevant times stated and alleged throughout this original civil rights complaint, private citizens Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Yingchun Chen, and DOES 1-10 all acted under color of law by conspiring to recklessly violate KING AROGANT's Fourteenth Amendment Due Process Clause constitutional rights and California Constitution Article I, §§ 7 & 26 rights, and then actually knowingly, carelessly, recklessly, wantonly, maliciously, willfully and callously violating KING AROGANT's Fourteenth Amendment Due Process Clause constitutional rights and California Constitution Article I, §§ 7 & 26 rights under color of law.

612. Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Yingchun Chen, and DOES 1-10 by their illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, transgressions, violations, and misdoings intended to inflict emotional distress upon Plaintiff KING AROGANT via violating KING AROGANT's Fourteenth Amendment Due Process Clause constitutional rights, and California Constitution Article I, §§ 7 & 26 rights. Said conduct was intentional and malicious and done for the sole purpose of causing Plaintiff KING AROGANT to suffer humiliation, sadness, headaches caused by emotional distress, stomach ache and abdominal pain caused by emotional distress, mental anguish, and emotional and physical distress.

613. Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Yingchun Chen, and DOES 1-10's negligence proximately and actually caused Plaintiff KING AROGANT to suffer severe and ongoing personal injuries and great physical, mental, emotional and psychological pain and suffering, all to his general damages, compensatory damages, and special damages in amount to be proved according to proof.

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 JUDICIAL ABUSE OF PROCESS, 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, HED, & NEGLIGENT HED

1 614. Further, as a direct and legal result of the hereinabove alleged negligence of Defendants
2 Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Yingchun
3 Chen, and DOES 1-10, and the injuries caused thereby them all, Plaintiff KING AROGANT
4 was forced to incur and will continue to be forced to incur various medical costs, psychiatric
5 costs, and expenses as special damages in an amount to be determined at the time of jury trial.
6

7 615. Further, as a direct and legal result of the hereinabove alleged negligence of Defendants
8 Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Yingchun
9 Chen, and DOES 1-10 , Plaintiff KING AROGANT has lost and will continue to lose, real
10 property, his liberty and freedom, and his constitutional civil rights, all to Plaintiff's special
11 damages in amount to be determined at the time of trial herein.
12

13 616. As a further proximate result of Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley
14 Albiento, Bryce Miller, Elizabeth Byers, Yingchun Chen, and DOES 1-10's illegal acts, actions,
15 misconduct, misdoings, misdeeds, and the consequences proximately caused by it, Plaintiff
16 KING AROGANT, as hereinabove alleged, suffered humiliation, mental anguish, sadness,
17 depression, anxiety, tension headaches headaches because of emotional distress caused by
18 Defendants, stomach aches and abdominal pain caused by Defendants, head and emotional and
19 physical distress and has been injured in mind and body as follows: damages in the sum to be
20 determined at trial based on proof.
21

22 617. **WHEREFORE**, Plaintiff Alison Helen Fairchild demands judgment against Defendants
23 Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Yingchun
24 Chen, and DOES 1-10 on the third California state cause of action of Plaintiff Arogant
25 Hollywood's original civil rights complaint in the amount that will justly compensate Plaintiff
26 for his compensatory, general, and special damages, together with costs and attorney's fees in
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 JUDICIAL ABUSE OF PROCESS, 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, HED, & NEGLIGENT HED**

1 this action.

2
3 **FOURTH CALIFORNIA STATE CAUSE OF ACTION---NEGLIGENT INFLICTION**
4 **OF EMOTIONAL DISTRESS--ALLEGED BY AROGANT HOLLYWOOD AS**
5 **AGAINST DEFENDANTS BRIAN MCGEE, ASHLEY ALBIENTO, BRYCE MILLER,**
6 **ELIZABETH BYERS, CHERYL LYNN KAYLOR, YINGCHUN CHEN, & DOES 1-10**
7

8 618. Plaintiff KING AROGANT hereby restates, reincorporates, reiterates, realleges, and
9 incorporates by reference previous paragraphs 1-617 of this original constitutional civil rights
10 complaint herein.

11
12 619. At all relevant times stated and alleged throughout this original civil rights complaint,
13 private citizens Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth
14 Byers, Yingchun Chen, and DOES 1-10 all acted under color of law by conspiring to recklessly
15 violate KING AROGANT's Fourteenth Amendment Due Process Clause constitutional rights
16 and California Constitution Article I, §§ 7 & 26 rights, and then actually knowingly, carelessly,
17 recklessly, wantonly, maliciously, willfully and callously violating KING AROGANT's
18 Fourteenth Amendment Due Process Clause constitutional rights and California Constitution
19 Article I, §§ 7 & 26 rights under color of law.

20
21 620. Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth
22 Byers, Yingchun Chen, and DOES 1-10, by their illegal acts, actions, misdeeds, wrongdoings,
23 misconduct, misbehavior, transgressions, violations, and misdoings, complained and alleged in
24 paragraphs 1-617 of this original civil rights complaint, negligently inflicted emotional distress
25 upon Plaintiff KING AROGANT. Said conduct was intentional and malicious and done by
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 JUDICIAL ABUSE OF PROCESS, 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 Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth Byers,
2 Yingchun Chen, and DOES 1-10 for the sole purpose of causing Plaintiff KING AROGANT to
3 suffer humiliation, mental anguish, and emotional and physical distress.

4
5 621. Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth
6 Byers, Yingchun Chen, and DOES 1-10's negligence proximately and actually caused Plaintiff
7 KING AROGANT to suffer severe and ongoing personal injuries and great physical, mental,
8 emotional and psychological pain and suffering, all to his general damages, compensatory
9 damages, and special damages in amount to be proved according to proof.

10
11 622. Further, as a direct and legal result of the hereinabove alleged negligence of the
12 Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth Byers,
13 Yingchun Chen, and DOES 1-10, and the injuries caused thereby them all, Plaintiff KING
14 AROGANT was forced to incur and will continue to be forced to incur various medical costs,
15 psychiatric costs, and expenses as special damages in an amount to be determined at the time of
16 jury trial.

17
18 623. Further, as a direct and legal result of the hereinabove alleged negligence of Defendants
19 Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth Byers, Yingchun
20 Chen, and DOES 1-10, Plaintiff KING AROGANT has lost and will continue to lose, real
21 property, his freedom and liberty, and his constitutional civil rights, all to his special damages in
22 an amount to be determined at the time of trial herein.

23
24 624. As a further proximate result of Defendants Cheryl Lynn Kaylor, Brian McGee, Ashley
25 Albiento. Bryce Miller, Elizabeth Byers, Yingchun Chen, and DOES 1-10's actions and the
26 consequences proximately caused by it, as hereinabove alleged, Plaintiff KING AROGANT

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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NEGLIGENT IIED**

1 suffered humiliation, sadness, depression, anxiety, tension headaches, headaches because of
2 emotional distress caused by Defendants, stomach aches and abdominal pain caused by
3 Defendants, mental anguish, and emotional and physical distress, and has been injured in mind
4 and body as follows: damages in the sum to be determined at trial based on proof.

5
6 625. **WHEREFORE**, Plaintiff Arogant Hollywood demands judgment against Defendants
7 Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Yingchun
8 Chen, and DOES 1-10 on the fourth California state cause of action of Plaintiff's original civil
9 rights complaint in the amount that will justly compensate Plaintiff for his compensatory,
10 general, and special damages, together with costs and attorney's fees in this action.

11
12
13 **SEVENTH FEDERAL CAUSE OF ACTION**

14 **Violation of 42 U.S.C. § 1983, Under Color of Law Abuse of Judicial Process,**
15 **Fourteenth Amendment; California Constitution, Article I, §§ 7 & 26**

16 **Against Defendants George Gascón, Leo Ka Fong Lo, Brian McGee & DOES 1-10**
17 **(Count 1-11)**

18
19 626. Plaintiff KING AROGANT hereby restates, reincorporates, and realleges paragraphs 1-
20 625 of this original civil rights complaint herein.

21
22 627. At all times stated herein and throughout paragraphs 1-510 of this original constitutional
23 civil rights complaint, Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 recklessly
24 violated the United States Constitution and KING AROGANT's Fourteenth Amendment Due
25 Process Clause constitutional civil rights while they were gainfully employed and were acting
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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 under unconstitutional policies, practices, procedures, and traditions by local California
2 municipal corporation County of Los Angeles while they were all bathed, clothed, covered, and
3 draped under and in the color of law.

4
5 628. At all relevant times stated and alleged throughout this original civil rights complaint,
6 private citizens Brian McGee, and DOES 1-10 all acted under color of law by conspiring to
7 recklessly violate KING AROGANT's Fourteenth Amendment Due Process Clause
8 constitutional rights and California Constitution Article I, §§ 7 & 26 rights, and then actually
9 knowingly, carelessly, recklessly, wantonly, maliciously, willfully and callously violating
10 KING AROGANT's Fourteenth Amendment Due Process Clause constitutional rights and
11 California Constitution Article I, §§ 7 & 26 rights under color of law.

12
13 629. Historically at common law, judicial immunity does not insulate from damages liability
14 those private persons who corruptly conspire with a judge. Nor has the doctrine of judicial
15 immunity been considered historically as excusing a judge from responding as a witness when
16 his coconspirators are sued, even though a charge of conspiracy and judicial corruption will be
17 aired and decided. *Gravel v. United States*, 408 U.S. 606, distinguished. The potential harm to
18 the public from denying immunity to coconspirators if the fact finder mistakenly upholds a
19 charge of a corrupt conspiracy is outweighed by the benefits of providing a remedy.

20 *Dennis v. Sparks et al.*, DBA SIDNEY A. SPARKS, TRUSTEE, 449 U.S. 24, 101 S.Ct.
21 183, 66 L.Ed.2d 185 (1980) at 449 U.S.

22
23 630. "The common law tort of abuse of process arises when one uses the court's process for a
24 purpose other than that for which the process was designed. [Citations.] It has been `interpreted
25 broadly to encompass the entire range of "procedures" incident to litigation.' [Citation.] [¶]
26 `[T]he essence of the tort [is] ... misuse of the power of the court; it is an act done in the name of
27 the court and under its authority for the purpose of perpetrating an injustice.' [Citation.] To

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 JUDICIAL ABUSE OF PROCESS, 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.
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1 succeed in an action for abuse of process, a litigant must establish that the defendant (1)
2 contemplated an ulterior motive in using the process, and (2) committed a willful act in the use
3 of the process not proper in the regular conduct of the proceedings." (*Rusheen v. Cohen* (2006)
4 37 Cal.4th 1048, 1056-1057 [39 Cal.Rptr.3d 516, 128 P.3d 713] (*Rusheen*).)

5
6 631. The involvement of a policeman, a state official, whether or not his actions were lawful
7 or authorized, in the alleged conspiracy would plainly provide the state action needed to show a
8 direct violation of petitioner's Fourteenth Amendment rights entitling her to relief under §
9 1983, and private persons involved in such a conspiracy are "acting under color" of law and
10 can be liable under § 1983, *Adickes v. S.H. Kress Co.*, 398 U.S. 144, 90 S.Ct. 1598, 26 L.Ed.2d
11 142 (1970) at 152.

12
13 632. Defendants George Gascón and DOES 1-10 committed **reckless under color of law**
14 **ABUSE OF JUDICIAL PROCESS** by their, when their, and through their illegal acts, actions,
15 misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully,
16 knowingly, carelessly, recklessly, wantonly, maliciously, and callously allowing Billy
17 Khounthavong to testify falsely that Jennifer Hutton-Heger's first 911 audio recording
18 commenced at 10:03 AM and ended at 10:07 AM, and allowing Khounthavong to testify
19 falsely that Hutton-Heger's second 911 call commenced between 10:09 AM and 10:10
20 AM while Defendants knew that LASD CAD report proved Hutton-Heger's second 911
21 call commenced at 10:08 AM, violated the United States Constitution and violated KING
22 AROGANT's United States Fourteenth Amendment Due Process Clause constitutional civil
23 rights. **(Count 1)**

24
25 633. Which was reckless **under color of law ABUSE OF JUDICIAL PROCESS (Count 1)**
26 done by Defendants George Gascón and DOES 1-10 by them using, by them doing, by them

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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF LAW FRAUD UPON COURT], 42 U.S.C. §§ 1983, 1985, & 1986, U.S.C.A. CONST.
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NEGLIGENT HIED

1 executing, by them directing, by them employing, by them manipulating, and otherwise
2 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
3 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
4 unconstitutional advantage over KING AROGANT.

5
6 634. Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 committed **reckless under**
7 **color of law ABUSE OF JUDICIAL PROCESS** by their, when their, and through their illegal
8 acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of
9 Defendants willfully, knowingly, carelessly, recklessly, wantonly, maliciously, and callously
10 allowing Billy Khounthavong to testify falsely that phony and bogus LASD-created
11 GoPro video recordings GL010586 and GL010587 were downloaded from KING
12 AROGANT's GoPro camera on in February 2023, violated the United States Constitution
13 and violated KING AROGANT's United States Fourteenth Amendment Due Process Clause
14 constitutional civil rights. **(Count 2)**

15
16 635. Which was reckless **under color of law ABUSE OF JUDICIAL PROCESS (Count 2)**
17 done by Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them
18 doing, by them executing, by them directing, by them employing, by them manipulating, and
19 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
20 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
21 unconstitutional advantage over KING AROGANT.

22
23 636. Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 committed **reckless under**
24 **color of law ABUSE OF JUDICIAL PROCESS** by their, when their, and through their illegal
25 acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of
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 JUDICIAL ABUSE OF PROCESS, 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 Defendants willfully, knowingly, carelessly, recklessly, wantonly, maliciously, and callously
2 presenting, playing, and admitting into a criminal Superior Court of California courtroom
3 unoriginal and phony LASD-created GoPro video recordings GL010586 and GL010586
4 on April 5, 2023, that depicted and displayed KING AROGANT shutting off his GoPro
5 camera while wearing different clothing than he had on February 21, 2023, violated the
6 United States Constitution and violated KING AROGANT's United States Fourteenth
7 Amendment Due Process Clause constitutional civil rights. **(Count 3)**

8
9 637. Which was reckless **under color of law ABUSE OF JUDICIAL PROCESS (Count 3)**
10 done by Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them
11 doing, by them executing, by them directing, by them employing, by them manipulating, and
12 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
13 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
14 unconstitutional advantage over KING AROGANT.

15
16 638. Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 committed **reckless under**
17 **color of law ABUSE OF JUDICIAL PROCESS** by their, when their, and through their illegal
18 acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of
19 Defendants willfully, knowingly, carelessly, recklessly, wantonly, maliciously, and callously
20 presenting, playing, and admitting into a criminal Superior Court of California courtroom
21 unoriginal and phony LASD-created GoPro video recordings GL010586 and GL010586
22 on February 2, 2024 that depicted and displayed KING AROGANT shutting off his
23 GoPro camera while wearing different clothing than he had on February 21, 2023,
24 violated the United States Constitution and violated KING AROGANT's United States
25 Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 4)**

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 JUDICIAL ABUSE OF PROCESS, 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**

1 639. Which was reckless **under color of law ABUSE OF JUDICIAL PROCESS (Count 4)**
2 done by Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them
3 doing, by them executing, by them directing, by them employing, by them manipulating, and
4 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
5 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
6 unconstitutional advantage over KING AROGANT.

7
8 640. Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 committed **reckless under**
9 **color of law ABUSE OF JUDICIAL PROCESS** by their, when their, and through their illegal
10 acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of
11 Defendants willfully, knowingly, carelessly, recklessly, wantonly, maliciously, and callously
12 refusing to and failing to between February 23, 2023 and October 17, 2023 to provide
13 KING AROGANT with a playable copy of his original GoPro video recordings, violated
14 the United States Constitution and violated KING AROGANT's United States Fourteenth
15 Amendment Due Process Clause constitutional civil rights. **(Count 5)**

16
17 641. Which was reckless **under color of law ABUSE OF JUDICIAL PROCESS (Count 5)**
18 done by Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them
19 doing, by them executing, by them directing, by them employing, by them manipulating, and
20 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
21 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
22 unconstitutional advantage over KING AROGANT.

23
24 642. Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 committed **reckless under**
25 **color of law ABUSE OF JUDICIAL PROCESS** by their, when their, and through their illegal
26 acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions 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 JUDICIAL ABUSE OF PROCESS, 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 Defendants willfully, knowingly, carelessly, recklessly, wantonly, maliciously, and callously
2 refusing to and failing to between February 23, 2023, and November 22, 2024, to provide
3 KING AROGANT with a playable copy of his impeaching and phony LASD-created
4 GoPro video recordings GL010586 and GL010587 for which phony video recordings
5 depict and display KING AROGANT shutting off his GoPro camera wearing than
6 clothing than he had on February 21, 2023, and for which rogue County of Los Angeles
7 peace officer Billy Khounthavong testified that phony GoPro video recordings were
8 downloaded and retrieved from KING AROGANT's original illegally confiscated GoPro
9 camera, violated the United States Constitution and violated KING AROGANT's United
10 States Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 6)**

11
12 643. Which was reckless **under color of law ABUSE OF JUDICIAL PROCESS (Count 6)**
13 done by Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them
14 doing, by them executing, by them directing, by them employing, by them manipulating, and
15 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
16 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
17 unconstitutional advantage over KING AROGANT.

18
19 644. Defendants George Gascón and DOES 1-10 committed **reckless under color of law**
20 **ABUSE OF JUDICIAL PROCESS** by their, when their, and through their illegal acts, actions,
21 misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully,
22 knowingly, carelessly, recklessly, wantonly, maliciously, and callously presenting and
23 admitting into a criminal Superior Court of California uncertified, unattested, unverified,
24 and unfiled phony and bogus certificate of probable cause determination and search
25 warrant affidavit as evidence, violated the United States Constitution and violated KING
26

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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 JUDICIAL ABUSE OF PROCESS, 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

1 AROGANT's United States Fourteenth Amendment Due Process Clause constitutional civil
2 rights. **(Count 7)**

3
4 645. Which was reckless **under color of law ABUSE OF JUDICIAL PROCESS (Count 7)**
5 done by Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them
6 doing, by them executing, by them directing, by them employing, by them manipulating, and
7 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
8 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
9 unconstitutional advantage over KING AROGANT.

10
11 646. Defendants George Gascón and DOES 1-10 committed **reckless under color of law**
12 **ABUSE OF JUDICIAL PROCESS** by their, when their, and through their illegal acts, actions,
13 misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully,
14 knowingly, carelessly, recklessly, wantonly, maliciously, and callously presenting and
15 admitting into a criminal Superior Court of California recklessly false oral testimony that
16 Jennifer Hutton-Heger told County of Los Angeles peace officers Aaron D. Contreras
17 and Daniel Esqueda that KING AROGANT was brandishing a knife her home on
18 February 21, 2023, which Defendants knew was false because no knife incident was
19 documented in the police report and Defendants recklessly failed to correct the false
20 testimony, violated the United States Constitution and violated KING AROGANT's United
21 States Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 8)**

22
23 647. Which was reckless **under color of law ABUSE OF JUDICIAL PROCESS (Count 8)**
24 done by Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them
25 doing, by them executing, by them directing, by them employing, by them manipulating, and
26 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,

27
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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
2 unconstitutional advantage over KING AROGANT.

3
4 648. Defendants George Gascón, Leo Ka Fong Lo, and DOES 1-10 committed **reckless under**
5 **color of law ABUSE OF JUDICIAL PROCESS** by their, when their, and through their illegal
6 acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of
7 Defendants willfully, knowingly, carelessly, recklessly, wantonly, maliciously, and callously
8 failing to and refusing to turn over and provide court-appointed expert witness Thomas
9 Guzman-Sanchez with a copy of phony LASD-created GoPro video recordings
10 GL010586 and GL010587 after the Superior Court of California, County of Los Angeles,
11 Alhambra Superior Court, Department 1 appointed Guzman-Sanchez to compare real
12 GoPro video recordings to phony LASD-created GoPro video recordings GL010586 and
13 GL010587, violated the United States Constitution and violated KING AROGANT's
14 United States Fourteenth Amendment Due Process Clause constitutional civil rights. **(Count 9)**

15
16 649. Which was reckless **under color of law ABUSE OF JUDICIAL PROCESS (Count 9)**
17 done by Defendants George Gascón, Leo Ka Fong Lo and DOES 1-10 by them using, by them
18 doing, by them executing, by them directing, by them employing, by them manipulating, and
19 otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud,
20 conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
21 unconstitutional advantage over KING AROGANT.

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1 650. Defendants Brian McGee, and DOES 1-10 committed **reckless under color of law**
2 **ABUSE OF JUDICIAL PROCESS** by their, when their, and through their illegal acts, actions,
3 misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully,
4 knowingly, carelessly, recklessly, wantonly, maliciously, and callously hiring law firm Bartko
5 Zankel Bunzel Miller, rogue associate attorney Josiah Richard Jenkins (SBN # 332418), and
6 rogue attorney An Nguyen Ruda (SBN # 215453) to quash the criminal subpoenas that was
7 served upon GoPro Inc. while Defendant Brian McGee knew that he could have commanded an
8 appropriate GoPro Inc. employee to had testified to oral testimony regarding George Gascón's
9 phony and bogus LASD-created GoPro video recordings GL010586 and GL010587 that would
10 have instantaneously exonerated KING AROGANT, violated the United States Constitution
11 and violated KING AROGANT's United States Fourteenth Amendment Due Process Clause
12 constitutional civil rights. **(Count 10)**

13
14 651. Which was reckless **under color of law ABUSE OF JUDICIAL PROCESS (Count 10)**
15 done by Defendants Brian McGee and DOES 1-10 by them using, by them doing, by them
16 executing, by them directing, by them employing, by them manipulating, and otherwise
17 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
18 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
19 unconstitutional advantage over KING AROGANT.

20
21 652. Defendants Brian McGee, and DOES 1-10 committed **reckless under color of law**
22 **ABUSE OF JUDICIAL PROCESS** by their, when their, and through their illegal acts, actions,
23 misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants willfully,
24 knowingly, carelessly, recklessly, wantonly, maliciously, and callously submitting unfiled legal
25 documents to corrupt judicial officer Michael Villalobos that opposed the testimony of GoPro
26 Inc. and resulted in subpoenas for Brian McGee and Nicholas Woodman to never be issued,

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U.S.C. § 1983 [UNDER COLOR OF JUDICIAL ABUSE OF PROCESS, 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.
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NEGLIGENT IIED

1 phony and frivolous legal pleadings that were intentionally never filed with the Superior Court
2 of California, County of Los Angeles, Alhambra Superior Court violated the United States
3 Constitution and violated KING AROGANT's United States Fourteenth Amendment Due
4 Process Clause constitutional civil rights. **(Count 11)**

5
6 653. Which was reckless **under color of law ABUSE OF JUDICIAL PROCESS (Count 11)**
7 done by Defendants Brian McGee and DOES 1-10 by them using, by them doing, by them
8 executing, by them directing, by them employing, by them manipulating, and otherwise
9 engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies,
10 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
11 unconstitutional advantage over KING AROGANT.

12
13 654. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
14 transgressions of Defendants George Gascón and DOES 1-10 alleged throughout this civil
15 rights complaint in paragraphs 1-649 and alleged herein in **under color of law ABUSE OF**
16 **JUDICIAL PROCESS** Counts 1-9, were all recklessly under color of illegal acts and violations
17 of the United States Constitution done by Defendants George Gascón and DOES 1-10 while
18 they were all employed by the County of Los Angeles criminal prosecutors and peace officers,
19 and while they were all fully bathed, clothed, covered and draped in and under color of law.

20
21 655. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
22 transgressions of Defendants George Gascón and DOES 1-10 alleged throughout this civil rights
23 complaint in paragraphs 1-649 and alleged herein in under color of law DECEIT Count 1-9 were
24 all recklessly under color of law illegal acts and violations of the United States Constitution
25 done by Defendants George Gascón and DOES 1-10 using their under color of law
26

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1 enforcement policy and acting pursuant to illegal and unconstitutional customs, policies,
2 practices, procedures, and traditions of the regularly sued in federal district court County of Los
3 Angeles.

4
5 656. Defendants George Gascón, Brian McGee, Leo Ka Fong Lo, and DOES 1-10's reckless
6 under color of law illegal acts alleged throughout this civil rights complaint in paragraphs 1-655
7 and alleged herein in **under color of law ABUSE OF JUDICIAL PROCESS Count 1-11**
8 were a reckless violation of the United States Constitution, a reckless violation of KING
9 AROGANT's United States Fourth Amendment Due Process Clause constitutional civil rights,
10 and a violation of federal law.

11
12 657. As a further direct, foreseeable, and proximate result of said wrongful reckless, wanton,
13 malicious, willful, and callous acts by Defendants George Gascón, Leo Ka Fong Lo and DOES
14 1-10. Plaintiff KING AROGANT has incurred attorney's fees in an amount to be determined,
15 for which Plaintiff claims a sum to be established according to proof.

16
17 658. As alleged herein, Defendants George Gascón, Leo Ka Fong Lo, Brian McGee, and
18 DOES 1-10 were guilty of oppression and fraud, and Plaintiff KING AROGANT should
19 recover, in addition to actual damages, exemplary and punitive damages to make an example of
20 and to punish Defendants in an amount according to proof.

21
22 659. As a direct and proximate result of the negligence, recklessness, gross negligence,
23 willfulness, and wantonness as aforesaid by Defendants George Gascón, Leo Ka Fong Lo, Brian
24 McGee, and DOES 1-10, Plaintiff KING AROGANT sustained injuries and damages, including,
25 without limitation, embarrassment, humiliation, anxiety, depression, a complete disruption of
26

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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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IIED**

1 life, physical pain and suffering, emotional pain and suffering, deprivation of liberty and
2 freedom, insomnia, chest pain, inconvenience, heart palpitations, headaches, abdominal pain and
3 stomach aches, frustration, and mental anguish.

4
5 660. Defendants Brian McGee, Leo Ka Fong Lo, George Gascon, and DOES 1-10 are liable to
6 Plaintiff KING AROGANT for actual and punitive damages given their negligence,
7 recklessness, gross negligence, criminal indifference to civil obligations, and wantonness.

8
9 661. **WHEREFORE**, Plaintiff Arogant Hollywood demands judgment against Defendants
10 George Gascón, Leo Ka Fong Lo, Brian McGee, and DOES 1-10 of the seventh federal claim for
11 relief of Plaintiff Arogant Hollywood's original civil rights complaint in the amount that will
12 justly compensate Plaintiff for his compensatory, general, and special damages, together with
13 costs and attorney's fees in this action.

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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 JUDICIAL ABUSE OF PROCESS, 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.
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NEGLIGENT IIED**

1
2 **XIII.**

PRAYER FOR RELIEF

3
4 **WHEREFORE**, Plaintiff Arogant Hollywood respectively prays for judgment on the above-
5 alleged claims for relief against Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer
6 Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez,
7 Gavin Christopher Newsom, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr.,
8 Leah Tamu Wilson, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka
9 Fong Lo, George Gascón, Cheryl Lynn Kaylor, Yingchun Chen, & DOES 1-10 as follows:

- 10
11 1. Statutory disbursements, costs, expert fees, and attorney's fees authorized under 42
12 U.S.C. § 1988(b), and such further and other relief as the Court deems just and proper.
13
14 2. Pursuant to 42 U.S.C. § 18116, award compensatory damages, general damages, and
15 special damages to Plaintiff Arogant Hollywood in an amount determined by the jury that
16 would fully compensate Plaintiff Arogant Hollywood for the injuries, emotional harm,
17 mental anguish, embarrassment, humiliation, and degradation caused by Defendants
18 Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher
19 Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert
20 Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Brian
21 McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George
22 Gascón, Cheryl Lynn Kaylor, Yingchun Chen, & DOES 1-10
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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 JUDICIAL ABUSE OF PROCESS, 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**

- 1 3. Pursuant to 42 U.S.C. § 18116, award punitive damages to Plaintiff Arogant Hollywood
2 in an amount determined by the jury, but no less than three times the amount of actual
3 damages, which would punish all the above-stated Defendants Jeffrey A. Macomber,
4 Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers, Ronald
5 Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres Bonta,
6 Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Brian McGee, Ashley
7 Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascón, Cheryl Lynn
8 Kaylor, Yingchun Chen, & DOES 1-10
9
- 10 4. Pursuant to 42 U.S.C. § 1983, award compensatory damages, special damages, and
11 general damages to Plaintiff Arogant Hollywood in an amount determined by the jury
12 that would fully compensate Plaintiff Arogant Hollywood for the injuries, emotional
13 harm, mental anguish, embarrassment, humiliation, and degradation caused Defendants
14 Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher
15 Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert
16 Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Brian
17 McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George
18 Gascón, Cheryl Lynn Kaylor, Yingchun Chen, & DOES 1-10
19
- 20 5. Pursuant to 42 U.S.C. § 1983, award punitive damages to Plaintiff Arogant Hollywood in
21 an amount determined by the jury, but no less than three times the amount of actual
22 damages, that would punish Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer
23 Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer
24 Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Peter Dwight Halloran,
25 Dennis L. Beck Jr., Leah Tamu Wilson, Brian McGee, Ashley Albiento, Bryce Miller,
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27 6.

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1 Elizabeth Byers, Leo Ka Fong Lo, George Gascón, Cheryl Lynn Kaylor, Yingchun
2 Chen, & DOES 1-10 for the intentional, willful, wanton, and reckless misconduct
3 alleged in this civil rights complaint and that would effectively deter Defendants from
4 future discriminatory behavior.

5
6 6. Pursuant to 42 U.S.C. § 1985, award compensatory damages, special damages, and general
7 damages to Plaintiff Arogant Hollywood in an amount determined by the jury that would
8 fully compensate Plaintiff Arogant Hollywood for the injuries, emotional harm, mental
9 anguish, embarrassment, humiliation, and degradation caused by Defendants Jeffrey A.
10 Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher Chambers,
11 Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert Andres
12 Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Brian McGee,
13 Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George Gascón,
14 Cheryl Lynn Kaylor, Yingchun Chen, & DOES 1-10 misconduct alleged in this civil rights
15 complaint.

16
17 7. Pursuant to 42 U.S.C. § 1985, award punitive damages to Plaintiff Arogant Hollywood in
18 an amount determined by the jury, but no less than three times the amount of actual
19 damages, that would punish Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer
20 Barretto, Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer
21 Benavidez, Gavin Christopher Newsom, Robert Andres Bonta, Peter Dwight Halloran,
22 Dennis L. Beck Jr., Leah Tamu Wilson, Brian McGee, Ashley Albiento, Bryce Miller,
23 Elizabeth Byers, Leo Ka Fong Lo, George Gascón, Cheryl Lynn Kaylor, Yingchun Chen,
24 & DOES 1-10 for the intentional, willful, wanton, and reckless misconduct alleged in this
25 original constitutional civil rights complaint and that would effectively deter Defendants
26 from future discriminatory behavior.

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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

- 1 8. Award Plaintiff Arogant Hollywood damages (non-economic), special damages
2 (economic), actual and compensatory damages in an amount to be determined at trial to
3 compensate him for the California tort of negligence *per se* as alleged against private
4 citizens Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth
5 Byers, Yingchun Chen, and DOES 1-10
6
- 7 9. Award Plaintiff Arogant Hollywood damages (non-economic), special damages
8 (economic), actual and compensatory damages in an amount to be determined at trial to
9 compensate him for the California tort of general negligence as alleged against private
10 citizens Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento. Bryce Miller, Elizabeth
11 Byers, Yingchun Chen, and DOES 1-10
12
- 13 10. Award Plaintiff Arogant Hollywood damages (non-economic), special damages
14 (economic), actual and compensatory damages in an amount to be determined at trial to
15 compensate him for the California tort of intentional infliction of emotional distress as
16 alleged against private citizens Cheryl Lynn Kaylor, Brian McGee, Ashley Albiento.
17 Bryce Miller, Elizabeth Byers, Yingchun Chen, and DOES 1-10
18
- 19 11. Award Plaintiff Arogant Hollywood damages (non-economic), special damages
20 (economic), actual and compensatory damages in an amount to be determined at trial to
21 compensate him for the California tort of negligence intentional infliction of emotional
22 distress as alleged against private citizens Cheryl Lynn Kaylor, Brian McGee, Ashley
23 Albiento. Bryce Miller, Elizabeth Byers, Yingchun Chen, and DOES 1-10
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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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**

- 1 12. Award Plaintiff Arogant Hollywood general damages (non-economic), special
2 damages (economic), and actual and compensatory damages against Defendants Jeffrey
3 A. Macomber, Jason D. Johnson, Jennifer Barretto, Tammatha Foss, Christopher
4 Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin Christopher Newsom, Robert
5 Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr., Leah Tamu Wilson, Brian
6 McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo Ka Fong Lo, George
7 Gascón, Cheryl Lynn Kaylor, Yingchun Chen, & DOES 1-10 including damages for
8 without limitation, embarrassment, humiliation, anxiety, depression, a complete
9 disruption of life, physical pain and suffering, emotional pain and suffering, insomnia,
10 chest pain, inconvenience, heart palpitations, frustration, and mental anguish, emotional
11 distress, loss of enjoyment of life, loss of civil rights, and deprivation of constitutional
12 rights, and other pain and suffering on all claims allowed by the law in an amount of \$
13 **102,212,023** or a much more significant amount as may be set by a jury.
- 14
- 15 13. Award Plaintiff Arogant Hollywood punitive damages in the amount of \$ **302,212,023**
16 to impress upon Defendants Jeffrey A. Macomber, Jason D. Johnson, Jennifer Barretto,
17 Tammatha Foss, Christopher Chambers, Ronald Broomfield, Jennifer Benavidez, Gavin
18 Christopher Newsom, Robert Andres Bonta, Peter Dwight Halloran, Dennis L. Beck Jr.,
19 Leah Tamu Wilson, Brian McGee, Ashley Albiento, Bryce Miller, Elizabeth Byers, Leo
20 Ka Fong Lo, George Gascón, Cheryl Lynn Kaylor, Yingchun Chen, & DOES 1-10 to the
21 seriousness of their egregious conduct and to deter similar behavior in the future.
- 22
- 23 14. Award Arogant Hollywood interest from February 21, 2023.
- 24
- 25 15. Award Arogant Hollywood reasonable attorney's fees pursuant to 42 U.S.C. § 1988.
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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 JUDICIAL ABUSE OF PROCESS, Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW
DECEIT], 42 U.S.C. § 1983 [UNDER COLOR OF 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 16. Award Plaintiff Arogant Hollywood medical, incidental, and hospital expenses according
2 to proof.
- 3
- 4 17. Award Plaintiff Arogant Hollywood consequential damages in a sum reasonable to proof.
- 5
- 6 18. Award Plaintiff Arogant Hollywood injunctive relief against Defendants Bryce Miller,
7 Elizabeth Byers, George Gascón, Leo Ka Fong Lo, and non-Defendant Axon Enterprises
8 Inc., and Brian MARK Rosenberg and ORDER to all immediately turn over and provide
9 this United States District Court for the Eastern District of California with true and
10 correct electronic/digital copies of phony LASD-created GoPro video recordings
11 GX010586 and GX010587 that were recklessly uploaded to Axon Enterprises Inc.'s
12 evidence.com in February 2023 and March 2023 by rogue and dishonest County of Los
13 Angeles Sheriff's Department Fraud and Cyber Crime Bureau's Southern California High
14 Tech Task Force peace officers.
- 15
- 16
- 17 19. Order all other and further relief as the Court may deem equitable, just, and proper.
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20 **XIV. DEMAND FOR JURY TRIAL**

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22 Plaintiff Arogant Hollywood hereby demands a trial by jury for issues triable by a United
23 States District Court jury.

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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 JUDICIAL ABUSE OF PROCESS, 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**

1 Respectfully Submitted,

2
3 **DATE: November 26, 2024**

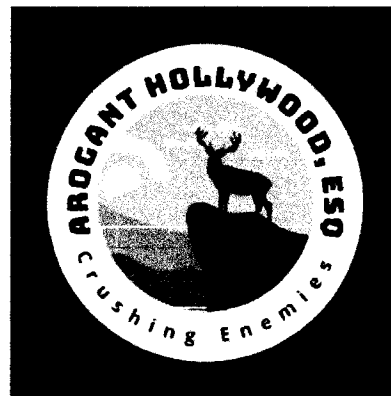
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5
6 BY:

Arogant Hollywood

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9
10 Arogant Hollywood, *Esq.*
11 1308 East Colorado Blvd.
12 Pasadena, CA 91106
13 Mobile: (626) 755-6442

14 Email: aroganthollywoodgenius@gmail.com

15 *Spirit of Esquire*



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 JUDICIAL ABUSE OF PROCESS, 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, & NEGLIGENCE IED**

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King

Arogant

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 JUDICIAL ABUSE OF PROCESS, 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**

VERIFICATION OF PLAINTIFF AROGANT HOLLYWOOD

United States of America

State of California

City of Los Angeles (Unincorporated), California, Within the County of Los Angeles

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

I, **AROGANT HOLLYWOOD**, am the Plaintiff in the above-entitled action and proceeding.

I have read the foregoing:

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

and know the contents thereof. The facts stated therein are true and within my personal knowledge, [except as to those matters which are therein alleged on information and belief, and as to those matters, I believe them to be true], and if called upon to testify, I would competently testify as to the matters stated 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 JUDICIAL ABUSE OF PROCESS, 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 I declare under penalty of perjury under the laws and Constitution of California
2 and the United States that every word, sentence, paragraph, and page of this
3 Original Civil Rights Complaint and Verification are true and correct.
4

5 DATE: November 26, 2024
6
7
8

9 BY: 
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11
12

13 Arogant Hollywood, *Esq.*
14 1308 East Colorado Blvd.
15 Pasadena, CA 91106
16 Mobile: (626) 755-6442
17 Email: aroganthollywoodgenius@gmail.com
18 *Spirit of Esquire*
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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 JUDICIAL ABUSE OF PROCESS, 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**

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS: AROGANT HOLLYWOOD
(b) County of Residence of First Listed Plaintiff: LOS ANGELES
(c) Attorneys: 1308 East Colorado Blvd. Pasadena, CA 91106
DEFENDANTS: Jeffrey A. Macomber, Jason D. Johnson
County of Residence of First Listed Defendant: SACRAMENTO
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
Table with columns for Plaintiff (PTF) and Defendant (DEF) citizenship and business location.

IV. NATURE OF SUIT (Place an "X" in One Box Only)
Grid of categories: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, PRISONER PETITIONS, TORTS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)
1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District, 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 42 U.S.C. § 1983 & 1985
Brief description of cause: UNDER COLOR OF LAW FRAUD, UNDER COLOR OF LAW DECEIT, UNDER COLOR OF ABUSE OF JUDICIAL PROCESS

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ 404,424,046
CHECK YES only if demanded in complaint: JURY DEMAND: [X] Yes [] No

VIII. RELATED CASE(S) IF ANY
(See instructions): JUDGE DOCKET NUMBER

DATE: NOVEMBER 26, 2024
SIGNATURE OF ATTORNEY OF RECORD: Arogant Hollywood

FOR OFFICE USE ONLY
RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

2:24-cv-3351 DAD CSK (PS)

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

Arogant Hollywood ,

CASE NO: 2:24-CV-03351-DAD-CSK

vs.

SUMMONS IN A CIVIL CASE

Jeffrey A. Macomber , et al. ,

TO: Ashley Albiento, Jennifer Barretto, Dennis L. Beck, Jr, Jennifer Benavidez, Robert Andres Bonta, Ronald Broomfield, Elizabeth Byers, Christo Chambers, Yingchun Chen, Tammatha Foss, George Gascon, Peter Dwight Halloran, Jason D. Johnson, Cheryl Lynn Kaylor, Leo Ka Fong Lo, Jeffrey A. Macomber, Brian McGee, Bryce Miller, Gavin Christopher Newsom, Leah Tamu Wilson

Defendant's Address:

YOU ARE HEREBY SUMMONED and required to serve on:

**Arogant Hollywood
1308 East Colorado Blvd.
Pasadena, CA 91106**

an answer to the complaint which is served on you with this summons, **within 21 days after service of this summons on you**, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

KEITH HOLLAND



CLERK

/s/ V. Kyono

(By) DEPUTY CLERK

**ISSUED ON 2024-12-03 14:00:02
CLERK, USDC EDCA**

RETURN OF SERVICE

Service of the Summons and complaint was made by me (1)	DATE
NAME OF SERVER (<i>PRINT</i>)	TITLE

Check one box below to indicate appropriate method of service

- Served personally upon the defendant. Place where served: _____

- Left copies thereof at the defendant's dwelling house or usual place of bode with a person of suitable age and discretion then residing therein.
- Name of person with whom the summons and complaint were left: _____
- Returned unexecuted: _____

- Other (specify) : _____

STATEMENT OF SERVICE FEES

TRAVEL	SERVICES	TOTAL
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DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.

Executed on _____ Date _____ *Signature of Server* _____

Address of Server

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): AROGANT HOLLYWOOD 1308 EAST COLORADO BLVD. PASADENA, CA 91106 aroganthollywoodgenius@gmail.com TELEPHONE NO.: (626) 755-6442 FAX NO.: ATTORNEY FOR (Name): Respondent in Propria Persona	FOR COURT USE ONLY CASE NUMBER: 24PSRO02202
NAME OF COURT: WHITTIER SUPERIOR COURT STREET ADDRESS: 7339 PAINTER AVENUE MAILING ADDRESS: CITY AND ZIP CODE: WHITTIER, CA 90602 BRANCH NAME: WHITTIER SUPERIOR COURTHOUSE	
PLAINTIFF/ PETITIONER: qiongyao zou DEFENDANT/ RESPONDENT: AROGANT HOLLYWOOD	
CIVIL SUBPOENA For Personal Appearance at Trial or Hearing	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of witness, if known):
 COUNTY OF LOS ANGELES SHERIFF'S DEPARTMENT DEPUTY PEACE OFFICER HERNANDEZ (# 679557)
 21695 VALLEY BLVD.
 WALNUT, CA 91789

1. **YOU ARE ORDERED TO APPEAR AS A WITNESS** in this action at the date, time, and place shown in the box below **UNLESS** you make an agreement with the person named in item 2:

a. Date: DECEMBER 20, 2024	Time: 8:30 AM	<input checked="" type="checkbox"/> Dept.: 301	<input type="checkbox"/> Div.:	<input checked="" type="checkbox"/> Room: 301
b. Address: 7339 PAINTER AVENUE WHITTIER, CA 90602				

2. **IF YOU HAVE ANY QUESTIONS ABOUT THE TIME OR DATE FOR YOU TO APPEAR, OR IF YOU WANT TO BE CERTAIN THAT YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSON BEFORE THE DATE ON WHICH YOU ARE TO APPEAR:**

a. Name of subpoenaing party or attorney: AROGANT HOLLYWOOD
 b. Telephone number: (626) 755-6442

3. **Witness Fees:** You are entitled to witness fees and mileage actually traveled both ways, as provided by law, if you request them at the time of service. You may request them before your scheduled appearance from the person named in item 2.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: DEC 09 2024

L. ITO
 (TYPE OR PRINT NAME)



[Handwritten Signature]
 (SIGNATURE OF PERSON ISSUING SUBPOENA)
 CSA II
 (TITLE)

Requests for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least 5 days before the date on which you are to appear. Contact the clerk's office or go to www.courtinfo.ca.gov/forms for Request for Accommodations by Persons With Disabilities and Order (form MC-410). (Civil Code, § 54.8.)



(Proof of service on reverse)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): AROGANT HOLLYWOOD 1308 EAST COLORADO BLVD. PASADENA,, CA 91106 aroganthollywoodgenius@gmail.com TELEPHONE NO.: (626) 755-6442 FAX NO.: ATTORNEY FOR (Name): Respondent in Propria Persona	FOR COURT USE ONLY
NAME OF COURT: WHITTIER SUPERIOR COURT STREET ADDRESS: 7339 PAINTER AVENUE MAILING ADDRESS: CITY AND ZIP CODE: WHITTIER, CA 90602 BRANCH NAME: WHITTIER SUPERIOR COURTHOUSE	
PLAINTIFF/ PETITIONER: qiongyao zou DEFENDANT/ RESPONDENT: AROGANT HOLLYWOOD	
CIVIL SUBPOENA For Personal Appearance at Trial or Hearing	CASE NUMBER: 24PSRO02202

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of witness, if known):
 COUNTY OF LOS ANGELES SHERIFF'S DEPARTMENT DEPUTY PEACE OFFICER HICKS (# 60228)
 21695 VALLEY BLVD.
 WALNUT, CA 91789

1. **YOU ARE ORDERED TO APPEAR AS A WITNESS** in this action at the date, time, and place shown in the box below **UNLESS** you make an agreement with the person named in item 2:

a. Date: DECEMBER 20, 2024 Time: 8:30 AM <input checked="" type="checkbox"/> Dept.: 301 <input type="checkbox"/> Div.: <input checked="" type="checkbox"/> Room: 301
b. Address: 7339 PAINTER AVENUE WHITTIER, CA 90602

2. **IF YOU HAVE ANY QUESTIONS ABOUT THE TIME OR DATE FOR YOU TO APPEAR, OR IF YOU WANT TO BE CERTAIN THAT YOUR PRESENCE IS REQUIRED, CONTACT THE FOLLOWING PERSON BEFORE THE DATE ON WHICH YOU ARE TO APPEAR:**

a. Name of subpoenaing party or attorney: AROGANT HOLLYWOOD	b. Telephone number: (626) 755-6442
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3. **Witness Fees:** You are entitled to witness fees and mileage actually traveled both ways, as provided by law, if you request them at the time of service. You may request them before your scheduled appearance from the person named in Item 2.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued:

DEC 09 2024

L. ITO

(TYPE OR PRINT NAME)



CSATT

(SIGNATURE OF PERSON ISSUING SUBPOENA)

(TITLE)

Requests for Accommodations

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least 5 days before the date on which you are to appear. Contact the clerk's office or go to www.courtinfo.ca.gov/forms for Request for Accommodations by Persons With Disabilities and Order (form MC-410). (Civil Code, § 54.8.)



(Proof of service on reverse)

SHUT DOWN CHIQUITA LANDFILL



We are joining your Board of Supervisors meeting today, December 17th, to request that you declare a State of Emergency in Los Angeles County for an urgent and ongoing health and safety crisis impacting the communities surrounding the Chiquita Canyon Landfill.

The communities of Val Verde and Castaic have endured prolonged exposure to dangerous gasses, including methane and benzene, with neighbors reporting symptoms including headaches, nausea, asthma, nosebleeds, heart palpitations, vomiting and cancer. The landfill has received violations from AQMD, CalRecycle, CalEPA and the U.S. EPA, LA County Public Health, and several other agencies. Yet it continues to remain open.

**Thank you for listening to our community. Please help us save lives through:
A State of Emergency Declaration
Government Relief to Residents
Chiquita Canyon Landfill Closed Forever**

**Contact Oshea Orchid,
oo@somlawyers.com
for more information.**

LA County BOS meeting, Dec. 17, 2024

Good morning. My name is Rebecca Overmyer-Velazquez, I coordinate the Clean Air Coalition of North Whittier and Avocado Heights and we are here today to ask you to oppose the renewal of Quemetco/Ecobat's operating permit.

In 2020, the Board of Supervisors sent a 5-signature letter to the Department of Toxic Substances Control that opposed the renewal of Quemetco/Ecobat's operating permit until 4 conditions were met. We want you to know that these conditions have **not** been met:

1st. All of Quemetco's unresolved violations of law HAVE NOT been remedied. Despite the 2022 settlement of Quemetco's 29 violations of state hazardous waste laws and regulations, DTSC abandoned its authority under the law to require Ecobat to maintain a secondary containment and leak detection system for the containment building, where hazardous waste is stored. DTSC has allowed this compliance failure to persist *since 2015*, even after the 2022 settlement. Worse, the \$1.15 million financial penalty Ecobat had to pay in 2022 is a tiny fraction of what the facility was liable for, given the number and duration of violations – like this one that continued for many years. Based on our calculations, DTSC could have penalized Ecobat for at least \$140 million to up to \$2.2 billion;

2nd. Additional community soil sampling and cleanup HAS NOT BEEN completed by Quemetco/Ecobat;

3rd. A rigorous public environmental review process in compliance with the California Environmental Quality Act WAS NOT COMPLETED; and

4th. Quemetco/Ecobat's Violations Scoring Procedure, or VSP, Score is among the worst in California. Since 2021, Ecobat's VSP score has been **higher than or tied with** Phibro-Tech's VSP score. Notably, Supervisor Hahn has called for Phibro-Tech to be closed, stating to DTSC: (quote) *Not only do I urge the DTSC not to approve a new permit for this facility, I believe that **this facility needs to be shut down entirely until it can come into compliance with the law.** Phibro-Tech poses too great of a threat to the health and safety of its workers and the local community.* (unquote)
Quemetco/Ecobat poses the same threat to the health and safety of its workers and to our community and should also be shut down.

As part of this closure, please urge the state of California to look for a different location and a different company to take over hazardous waste processing from Ecobat, while guaranteeing the workers clean jobs in a zero-emission, 21st-century facility.

Thank you.

Rebecca

rebecca@cleanaircoalition.org

MOTION BY SUPERVISORS HILDA L. SOLIS AND
JANICE HAHN

July 21, 2020

Oppose Consideration Of Quemetco's Permit Renewal Until Full Compliance With
All Environmental Laws Has Been Met

Quemetco, Inc. (Quemetco) is a battery recycling facility which has been in operation since 1972 in the City of Industry. Quemetco crushes and melts 600 tons of used lead-acid batteries per day to reclaim lead and other recyclable materials. The facility also stores hazardous waste, including lead-containing materials. The state of California has enacted a comprehensive statutory and regulatory framework for the generation, handling, treatment, transport and disposal of hazardous waste.

In 2015, prior to the expiration of Quemetco's Department of Toxic Substances Control (DTSC) operating permit, the facility submitted a permit renewal application. DTSC has been reviewing that application since March of 2015. In addition to its DTSC permit renewal application, Quemetco has applied to the South Coast Air Quality Management District (SCAQMD) for a permit modification to significantly increase its operations and to switch from calcined coke to petroleum coke, a more polluting fuel source than it currently uses.

MOTION

SOLIS _____

RIDLEY-THOMAS _____

KUEHL _____

HAHN _____

BARGER _____

Quemetco's operations emit lead, arsenic, benzene and other chemicals. Quemetco has repeatedly violated state law in its handling of toxic substances, including lead, endangering the health and safety of their workers and neighboring communities. Quemetco's violations of state environmental laws have resulted in hazardous waste and toxic air pollution being released.

The community near Quemetco has been identified by CalEPA as a "Disadvantaged Community" pursuant to SB 535. The people burdened most by Quemetco are predominantly communities of color. Consequently, there are serious environmental justice concerns raised by the continued and expanded operations of Quemetco.

Still unresolved

In November 2018, DTSC sued Quemetco for 29 violations of state hazardous waste laws and regulations. In December 2018, DTSC ordered Quemetco to remove contaminated soil immediately outside its facility, where sampling found high levels of lead. DTSC announced in February 2020, it reached a tentative workplan with Quemetco to undertake this cleanup. While this cleanup has begun, the workplan has not been fully implemented. Until this cleanup has been completed, DTSC should not even consider approval of the permit renewal.

DTSC has acknowledged that further sampling is necessary to completely understand the full magnitude of Quemetco's contamination in surrounding communities. On November 16, 2018, DTSC also issued a Corrective Action Order to Quemetco related to the release of hazardous waste from its facility. On July 18, 2019, DTSC dismissed without prejudice its Corrective Action Order. On February 11, 2020, DTSC and Quemetco entered into a Corrective Action Consent Agreement which requires various

actions including a current conditions report. Further investigation is required to determine the full nature and extent of contamination from Quemetco. The community is waiting for a sampling plan to be developed and implemented by Quemetco and DTSC.

Still true

Based on permitting regulations implemented in 2019, DTSC was required to develop a violation score (VSP) for each facility it regulates, including Quemetco. On May 7, 2019, DTSC announced Quemetco's score of 32.67, which made it the 8th worst ranking in California. On December 10, 2019, DTSC revised Quemetco's VSP score upward to 35.38. Scores between 40 and 20 are deemed "conditionally acceptable" per DTSC regulations and require a facility to undertake third-party audits. Quemetco has appealed its VSP score. As a result of that appeal, the VSP score could be raised or lowered. Until the VSP process is complete, including any required actions that must be undertaken as a result of the VSP process, it is premature for DTSC to consider renewal of the operating permit.

Still true?

In May 2020, DTSC also announced it would be issuing a preliminary decision on Quemetco's request for permit renewal by September 2020. Any decision other than denial of the permit is premature given the pending and unresolved enforcement actions and regulatory investigations regarding Quemetco.

Quemetco has received four Notices of Violations (NOVs) from SCAQMD since July 2017, including two NOVs for exceeding the level of permitted arsenic emissions. In May 2020, SCAQMD entered into a \$600,000 settlement with Quemetco to resolve the outstanding NOVs. SCAQMD provided a short press release announcing the settlement with Quemetco, but it has not held a public meeting to explain the basis of the settlement or how the \$600,000 will be spent.

still true

SCAQMD should hold a public meeting to explain the settlement and how the violations were resolved. Additionally, SCAQMD should consider using a portion of the settlement to benefit the community affected by Quemetco's operations. Finally, it is premature for SCAQMD to consider Quemetco's requested permit to increase its operations, when DTSC is still considering Quemetco's operating permit renewal.

The extent of Quemetco's lead contamination in the community has not been fully assessed or cleaned up. Quemetco continues to have unresolved violations with DTSC. The cleanup ordered by DTSC immediately adjacent to Quemetco recently began in a small part of the clean-up area but remains incomplete. Finally, the DTSC VSP process has not been finalized and based on Quemetco's current score of conditionally acceptable, it is subject to a third-party audit.

Quemetco's operating permit renewal must not be considered until all outstanding issues are resolved and the health impact to the community from Quemetco's historic, current, and proposed future operations has been fully analyzed by DTSC. Finally, no permit renewal should be granted unless Quemetco can demonstrate that: (1) it has implemented enforceable improvements to its facility operations, processes and equipment that will prevent future violations; and (2) there are substantial and overriding benefits to the people of the State of California resulting from the continued operation of the facility.

By opposing consideration of Quemetco's permit renewal until the current violations of law have been remedied and until the extent of the contamination is fully investigated and remedied, the County is supporting constituents directly impacted by Quemetco's operations and pollution.

WE, THEREFORE, MOVE that the Board of Supervisors send a five-signature letter to the Department of Toxic Substances Control (DTSC) that opposes consideration of the renewal of Quemetco's operating permit until:

1. All of Quemetco's unresolved violations of law are remedied; *NOT DONE*
2. Additional community sampling and cleanup is completed by Quemetco; *NOT DONE*
3. After DTSC's VSP process concludes, including implementation of third-party audits; and *VSP score is higher than Phibro-Tech's (worse)*
4. After a rigorous public environmental review process is completed in compliance with the California Environmental Quality Act. *NOT DONE*

WE FURTHER MOVE that the Board of Supervisors send a five-signature letter to the South Coast Air Quality Management District (SCAQMD) requesting:

1. SCAQMD hold a public meeting be held to explain the settlement to the public, including how the violations were resolved and how the funds will be used, and to take public comment;
2. SCAQMD consider using a portion of the settlement to benefit the community impacted by Quemetco's operations; and
3. SCAQMD halt consideration of Quemetco's permit to expand its throughput until after DTSC decides on Quemetco's request to renew its operating permit.

Never done!

WE FURTHER MOVE that copies of both letters be sent to Governor Gavin Newsom, CalEPA Director Jared Blumenfeld, and the Los Angeles County Legislative Delegation.

#

MICHELSON

CENTER FOR PUBLIC POLICY

December 17, 2024

Los Angeles County Board of Supervisors,

My name is Leslie Amaya-Yanez, and I am the Public Affairs and Advocacy representative for Michelson Center for Public Policy, where we work to advance innovative solutions to some of society's most pressing challenges. One of our key strategic programs is the **Pet-Inclusive Housing Initiative**, which aims to increase access to housing for families with pets by addressing barriers and promoting policies that support pet-friendly communities.

As an organization deeply committed to keeping people and pets together in rental housing, we believe that a feasibility study gives Supervisors a unique opportunity to better understand the needs of their constituents.

We are eager to work alongside other community-based organizations to provide meaningful input and share best practices as we work through this process.

A feasibility study can only enhance the decision-making process; it is the most logical step towards starting conversations to determine what stakeholders need when it comes to pets and housing in LA County.

We are committed to being a part of this critical conversation and supporting the County in its efforts to make pet-inclusive housing a reality for all.

Thank you for the opportunity to share some key findings from our research that support the necessity of the proposed feasibility study on a pet ownership ordinance for rent-stabilized units in unincorporated Los Angeles County.

76% of rental housing providers identify their properties as pet-friendly, yet 72% of renters say that pet-friendly housing is hard to find. This feasibility study provides a pathway for understanding and remedying that disconnect.

Two-thirds of households in the U.S. have pets. While 67% of rental properties in Los Angeles County allow pets, among those, 83% impose breed restrictions and 59% have weight restrictions, with less than

6% of all rental properties in LA County having no such limitations. This feasibility study gives Supervisors an opportunity to address pet restrictions in housing that disproportionately impact large-breed dogs, drive overcrowding, and limit adoption opportunities in the animal shelters in their districts

Pet-related fees are another significant barrier for renters with pets. Among rental properties that allow pets in Los Angeles, the average upfront refundable pet deposit is \$456, while the average nonrefundable pet fee is \$436, and monthly pet rent averages \$59. These fees and restrictions are often explained by concerns about property damage; yet, our data shows less than 10% of pets cause damage, with average repair costs of just \$210—well below a standard security deposit.

Importantly, inclusive pet policies can also be a financial win for rental housing providers. Pet owners stay 21% longer, reducing turnover costs and vacancies, which boosts net operating income. One case study found that eliminating breed and size restrictions generated an additional \$166,000 annually per property with no increase in behavioral issues.

Expanding housing access for pet owners would benefit renters, housing providers, and the broader community while easing pressure on animal shelters.

Thank you for your time and consideration.

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