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9 Attorneys for Plaintiffs

10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12 CHRISTINA ASTORGA, an individual, on
13 behalf of herself and as class
14 representative; HUGO PADILLA, an
15 individual, on behalf of himself and class
16 representative; RYAN MICHAEL
DODSON, an individual, and KIYOKO
DODSON, an individual, on behalf of
themselves and as class representatives,

17 Plaintiffs,

18 vs.

19 COUNTY OF LOS ANGELES, a
20 municipal corporation; LOS ANGELES
21 COUNTY SHERIFF'S DEPARTMENT, a
public entity; SHERIFF ALEX
22 VILLANUEVA, an individual; ALL CITY
TOW GIRL LLC, a California corporation;
23 and Does 1 through 10, all sued in their
24 individual capacities,

25 Defendants.

Case No. 2:20-cv-9805 CAS
(AGRx)

**FIRST AMENDED
COMPLAINT FOR
INJUNCTIVE RELIEF AND
DAMAGES**

- 1. Injunctive Relief (Class Claim) / 42 U.S.C. § 1983**
- 2. Deprivation of Property / Fourth & Fourteenth Amendments / 42 U.S.C. § 1983**
- 3. Takings Claim / Fifth Amendment / 42 U.S.C. § 1983**
- 4. Unreasonable Seizures / Fourth Amendment / 42 U.S.C. § 1983**

DEMAND FOR JURY TRIAL

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1 **I. JURISDICTION AND VENUE.**

2 1. Plaintiffs’ claims arise under 42 U.S.C. §1983. Accordingly, federal jurisdiction
3 is conferred upon this Court by 28 U.S.C. §§ 1331 and 1343.

4 2. Plaintiffs’ claims arise out of, *inter alia*, acts of personnel employed by the
5 County of Los Angeles, causing injury to Plaintiff in the County of Los Angeles.
6 Accordingly, venue is proper within the Central District of California.

7 **II. PARTIES.**

8 3. Plaintiff Christina Astorga, an individual, is and was at all times relevant hereto,
9 a resident of the County of Los Angeles, City of Los Angeles. She is a military veteran
10 (medically retired) and the founder of the Los Angeles Chapter of “Wall of Vets.”

11 4. Plaintiff Hugo Padilla, an individual, is and was at all times relevant hereto, a
12 resident of the County of Los Angeles, City of Los Angeles.

13 5. Plaintiffs Ryan Michael Dodson (“Michael Dodson”) and Kiyoko Dodson,
14 individuals, were and are at all times relevant hereto, husband and wife. They are the
15 owners of a white Chevrolet Silverado truck (“Truck”), although the sole registered
16 owner is Ryan Dodson.

17 6. At all times material herein, defendant County of Los Angeles (“LA County”)
18 was and is a public entity duly organized and chartered under the laws of the State of
19 California, and was responsible for the hiring, training, and supervising of the conduct
20 of its employees and agents of the County and the Los Angeles County Sheriff’s
21 Department and all LASD deputies and members.

22 7. At all times material herein, defendant Los Angeles County Sheriff’s Department
23 (“LASD”), is a public entity subject to suit under 42 U.S.C. § 1983 (*Streit v. County of*
24 *Los Angeles*, 236 F.3d 552, 565-66 (9th Cir. 2001)).

25 8. Plaintiffs name the LASD as a separate defendant for two reasons. First,
26 Plaintiffs are informed and believe and based thereon allege that LA County Sheriff Alex
27 Villanueva may claim he is *not* a policymaker for defendant LA County. However,
28 Plaintiffs are further informed and believe and based thereon allege that should

1 Villanueva make that claim, he will nevertheless admit he *is* the policymaker with respect
2 to his own department, defendant LASD. Thus, Villanueva’s self-admitted status as a
3 policymaker for defendant LASD will make that defendant subject to liability should it
4 be determined that Villanueva is responsible for policies that violated the constitutional
5 rights of Plaintiffs and class members.

6 9. Second, there is disagreement between the Ninth Circuit and the California
7 Supreme Court on whether a California sheriff is a state or county policymaker for § 1983
8 purposes. In *Brewster v. Shasta County*, 275 F.2d 803 (9th Cir. 2001), and *Streit v.*
9 *County of Los Angeles*, 236 F.3d 552, 559 (9th Cir. 2001), the Ninth Circuit held that
10 California sheriffs are agents of their employing county for § 1983 purposes. The
11 California Supreme Court, in *Venegas v. County of Los Angeles*, 32 Cal.4th 820, 828-39
12 (2004), disagreed with the Ninth Circuit, holding instead that a California sheriff is not
13 an agent of his employing county for purposes of § 1983 liability. Should it ultimately be
14 determined that *Venegas* correctly states the law on this point, Plaintiffs are informed and
15 believe that Villanueva will nevertheless remain a policymaker for his own department,
16 defendant LASD. Since defendant LASD is *not* an arm of the state for purposes of
17 immunity under the Eleventh Amendment (see *Streit*, 236 F.3d at 556-57), Plaintiffs can
18 still prevail against Villanueva in his official capacity and defendant LASD
19 notwithstanding *Venegas*.

20 10. Defendants LA County and LASD are “persons” subject to suit within the
21 meaning of Title 42, U.S.C. § 1983 under *Monell v. New York Dept. of Social Serv.*, 436
22 U.S. 658, 691 (1978). Collectively, these two defendants are referred to as “Entity
23 defendants.”

24 11. Defendant Alex Villanueva (“Villanueva”), an individual, at all times material
25 hereto was and is the LA County Sheriff. Plaintiffs are informed and believe and based
26 therein allege that Villanueva is a policy maker for both defendants LA County *and*
27 LASD. Plaintiffs sue Villanueva in his individual and official capacities.

28 12. At all times material herein, Entity defendants were responsible for the

1 employment, training, and supervision of the actions, conduct, policies, practices, and
2 customs of the employees and agents of the LA County, including LASD and all of its
3 deputies and members. At all times material herein, Entity defendants were responsible
4 for assuring that the actions, conduct, policies, procedures, and customs of the LASD
5 complied with the laws and the Constitutions of the United States and of the State of
6 California.

7 13. Plaintiffs are informed and believe and based thereon allege that defendant All
8 City Tow Girl LLC (“All City Tow”) is a limited liability corporation, incorporated under
9 the laws of the state of California. Plaintiffs are informed that pursuant to a contract with
10 Entity defendants, All City Tow tows and stores vehicles at the direction of LASD
11 deputies.

12 14. The true names of defendants DOES 1 through 10, inclusive, are not now
13 known to Plaintiffs who therefore sue these Defendants by fictitious names. Upon
14 ascertaining the true name of a DOE Defendant, Plaintiffs will amend this complaint, or
15 seek leave to do so, by substituting same for the fictitious name. Plaintiffs are informed
16 and believe, and based thereon allege, that each DOE Defendant is in some manner
17 responsible for the injuries and damages herein complained of.

18 15. At all times material herein, defendants were each acting as the employee, agent
19 representative, and officer of every other defendant herein, and within the course and
20 scope of such employment and agency. All defendants were acting under color of state
21 law.

22 **III. FACTS COMMON TO ALL CLAIMS.**

23 16. Plaintiffs are informed and believe and based thereon allege that as a result of
24 recent instances of police uses of force causing the deaths of individuals under
25 circumstances demonstrating that officers may be guilty of unjustified homicides,
26 incidents that have occurred locally (e.g., June 18, 2020 LASD shooting death of Andres
27 Guardado; August 31, 2020 LASD shooting death of Dijon Kizzee) and across the nation
28 (e.g., March 13, 2020 shooting death of Breonna Taylor by Louisville officers; May 25,

1 2020 death of George Floyd while restrained by Minneapolis police officers) there have
2 been numerous protests and demonstrations in the County of Los Angeles. At issue here
3 are the protests on Tuesday, September 8, 2020, near at and/or near Imperial Highway
4 and Normandie Avenue, and the other Friday evening, September 25, 2020, in West
5 Hollywood.

6 *A. The September 8, 2020 Protest, Arrests of Plaintiffs Christina Astorga and*
7 *Hugo Padilla, and Seizures Of Their Property.*

8 17. Plaintiffs Christina Astorga and Hugo Padilla attended the September 8, 2020
9 protest, called “Justice for Dijon Kizzee.” Christina Astorga attended both as an
10 individual and as a representative for Wall of Vets, to support holding accountable those
11 responsible for the death of Dijon Kizzee. As she has done in other similar events, using
12 her smartphone Ms. Astorga intended to record and livestream video. Plaintiff Astorga
13 also planned to use her smartphone to update the social media profile she maintains for
14 “Wall of Vets - Los Angeles” with information concerning the “Justice for Dijon Kizzee”
15 protest.

16 18. Hugo Padilla attended the protest to document and broadcast the protest. As he
17 has done on other occasions at protests for racial justice and against police violence,
18 Plaintiff was “livestreaming” a video with audio narration to viewers on Youtube.com so
19 people not in attendance could observe what was happening in real time. Plaintiff was
20 riding his bicycle as he livestreamed the protest. Plaintiff was wearing a hat which
21 prominently displayed “PRESS.”

22 19. Plaintiffs are informed that at about 9:00 p.m., the LASD broke up the protest
23 at the corner of Imperial Highway and Normandie Avenue.

24 *Plaintiff Christina Astorga’s Arrest and Booking*

25 20. Plaintiff Astorga did not hear any announcement that the LASD had or were
26 ordering people to disperse; she concluded LASD had decided to stop the protest and
27 disperse the crowd when she saw LASD deputies shooting what she believes were rubber
28 bullets and pepper balls at Plaintiff and others. The LASD fired these rounds without

1 warnings. As they did so, the deputies advanced on the crowd of people Plaintiff Astorga
2 was in.

3 21. A nearby resident who saw what was happening opened the door to an
4 apartment complex which allowed Plaintiff and others to enter. Along with others
5 Plaintiff Astorga entered, seeking refuge. As she ran into the complex, without any
6 warnings one or more deputies fired projectiles at Plaintiff Astorga. Projectiles struck her
7 on her left flank rear and left knee, inflicting significant injuries. See **Exhibit B, C, D,**
8 **and E.** When the deputy(ies) fired the rounds, Plaintiff Astorga had not committed any
9 crime and was not threatening harm to anyone.

10 22. Deputies followed Plaintiff Astorga and the others into the complex. Plaintiff
11 and a fellow protester hugged each other in an effort to protect one another. Using her
12 smartphone, Plaintiff Astorga began to livestream as a female deputy approached her.
13 Plaintiff pleaded with the deputy, saying “don’t hurt us.” The deputy took Plaintiff’s
14 smartphone and pushed Plaintiff against a wall. A male deputy put his hands on Plaintiff
15 Astorga as the deputies handcuffed her. Plaintiff asked that they not bend her arm
16 upwards because of a pre-existing injury, also telling the deputies she was a veteran. The
17 male deputy said Plaintiff wasn’t a veteran and added, sarcastically mocking Plaintiff,
18 that “[She] like[s] to be arrested and like[s] to be handcuffed.”

19 23. After Plaintiff Astorga was handcuffed, she saw that the female deputy was
20 holding Plaintiff’s smartphone. It appeared the deputy was trying to do something with
21 it, perhaps turning it off (it was on and livestreaming when it was taken from Plaintiff’s
22 hand). That was the last time Plaintiff saw her smartphone.

23 24. Plaintiff Astorga was wearing a backpack when she was arrested. The deputies
24 took the backpack off Plaintiff during the handcuffing. Later, Plaintiff is informed, the
25 deputies took possession of the backpack.

26 25. Deputies took Plaintiff Astorga and other arrestees to a truck where they were
27 forced inside. Plaintiff Astorga saw a woman whose hands were bleeding; she was very
28 upset. Plaintiff Astorga and others pleaded with the deputies, asking them to provide care

1 to the woman. The deputies did nothing. Instead, deputies laughed, and took photos of
2 the arrestees with what appeared to be the deputies' personal cell phones.

3 26. Rather than issuing Plaintiff Astorga and the others citations and releasing them
4 in the field as is ordinarily required under state law and LASD policy, deputies
5 transported Plaintiff and the others to the LASD station on Imperial Highway. Deputies
6 took Plaintiff inside the station and began processing her for booking (booking number
7 6008199). A deputy, Deputy Luna, refused Plaintiff's request for face mask, responding
8 sarcastically "sure, you'll get a mask." Plaintiff Astorga was never provided a face mask.

9 27. During booking, Plaintiff Astorga was forced to remove her belt, shoes, and car
10 keys that were in her pocket. Deputies put her property in a plastic bag and kept them.
11 Plaintiff Astorga estimates she arrived at LASD Imperial station at about 9:30pm.
12 Plaintiff estimates she was not released from the station until early afternoon the next day,
13 September 9, 2020.

14 28. When Plaintiff Astorga was being processed for release on September 9, she
15 received the plastic bag with her belt, shoes, and car keys. She also received her
16 backpack. Missing from Plaintiff's backpack, however, were her military grade goggles
17 that were in the backpack when she was arrested. LASD personnel give Plaintiff a pink
18 sheet of paper, "Los Angeles County Jail Booking and Property Record," that supposedly
19 inventoried her property the deputies took. The copy Plaintiff received is unreadable (see
20 **Exhibit F**). Plaintiff asked a deputy for her smartphone taken at the time of Plaintiff
21 Astorga's arrest. The deputy stated Plaintiff would not get her smartphone until her court
22 date.

23 29. Plaintiff Astorga's paperwork states the charge against her is a violation of
24 Penal Code § 409 – failure to disperse. See **Exhibit G**. Plaintiff Astorga's court
25 appearance date is January 6, 2021 even though, Plaintiffs are informed, the district
26 attorney will not be filing charges. See **Exhibit A**.

27 30. Defendants' refusal to return Plaintiff's smartphone to her is causing her great
28 distress. Plaintiff used it for her everyday tasks, including staying in contact with family

1 and friends while maintaining substantial personal, private and sensitive information on
2 the smartphone. Plaintiff also used the smartphone to communicate with her organization,
3 Wall of Vets, organizing events, contacting members and others, and as she was doing
4 on September 8, 2020, recording the police as they confronted and arrested protesters.

5 31. Plaintiff's smartphone was not password protected. Consequently, the deputies
6 or whoever has the phone, can access all of Plaintiff's sensitive information, change
7 settings and the like. It appears that someone with the LASD did just that. After
8 Plaintiff's release and when she was unable to retrieve her smartphone, she obtained a
9 replacement. Upon logging onto her social media accounts, including the Instagram
10 account she operates for "Wall of Vets – Los Angeles," Plaintiff saw that the profile
11 description had been changed to "Blue Lives Matter #supportbluelives." Plaintiff is
12 informed that LASD personnel made the change as they were the last ones in possession
13 of Plaintiff's smartphone. A true and correct copy of a screenshot capturing this profile
14 change before Plaintiff deactivated the account is attached hereto as **Exhibit H**.

15 32. On September 10, 2020, Plaintiff returned to the LASD Imperial Station to
16 inquire about retrieving her smartphone. There was no one at the front desk so Plaintiff
17 called the posted phone number. The phone number appeared to be for an "inventory"
18 department. Plaintiff spoke with someone and, after providing her identifying
19 information, was told, again, that her smartphone would not be returned, if ever, until her
20 court date.

21 33. When Plaintiff was booked, she provided the LASD booking personnel a valid
22 address at which she receives mail and other notices. Since Plaintiff's September 8, 2020
23 arrest, Plaintiff has not received any notice for anyone, including the LASD or the
24 County, that her smartphone was being held or how or whom Plaintiff might contact to
25 retrieve her smartphone.

26 *Plaintiff Hugo Padilla's Arrest and Booking*

27 34. When the LASD broke up the protest at the corner of Imperial Highway and
28 Normandie Avenue, LASD personnel shot hard projectiles, including pepper balls (small,

1 hard balls covered in a peppery substance similar to pepper spray) and flash bang
2 grenades at the crowd. The crowd dispersed, mostly fleeing into the neighborhood
3 northeast of Imperial and Normandie.

4 35. Plaintiff Padilla also left, riding his bicycle north on a street parallel to
5 Normandie. Near Normandie and 110th Street as Plaintiff was riding his bicycle,
6 livestreaming and providing a narrative on what he was observing, without any warning
7 LASD personnel shot Plaintiff with a hard projectile. The projectile struck Plaintiff's
8 knee, knocking him off his bicycle and onto the ground. (This was captured on video.)
9 Deputies then jumped on Plaintiff, with one of them striking him in the face. The punch
10 busted Plaintiff's lip open and it began to bleed. Deputies handcuffed Plaintiff while
11 nearby, LASD personnel arrested other people. The deputies put handcuffs on Plaintiff
12 far too tightly, causing Plaintiff pain and injury. For weeks after Plaintiff's arrest, there
13 were still marks on his wrists from the handcuffs.

14 36. The deputies forced Plaintiff Padilla and other arrestees into the back of a large
15 truck. Deputies forced Plaintiff Padilla to crawl into the truck, handcuffed and in great
16 pain. Plaintiff observed that other persons arrested were injured. One young woman's
17 wrist looked badly injured and she was crying hysterically.

18 37. In the back of the truck were loose pepper balls. The balls covered Plaintiff
19 Padilla's clothing in a pepper-spray like substance, causing his eyes to water painfully.
20 The loose pepper balls were even making the deputies riding on the truck cough and
21 sneeze.

22 38. Deputies were laughing and making fun of Plaintiff Padilla and others in the
23 truck. It also appeared to Plaintiff that the deputies, using their personal cell phones, were
24 taking photos of those in the truck.

25 39. Before Plaintiff was knocked off his bicycle, the smartphone he was using to
26 livestream was a Samsung S8. When Plaintiff was knocked off his bicycle, the phone fell
27 from Plaintiff's hand and Plaintiff lost track of where the phone went. Once he was in the
28 back of the truck, Plaintiff asked the deputies if they had not yet picked up his phone, to

1 retrieve it. They responded by laughing. Consequently, Plaintiff is unsure if they retrieved
2 his phone but believes they did.

3 40. The deputies transported Plaintiff Padilla and others to the LASD South Los
4 Angeles station on Imperial Highway. Upon their arrival at the station, Plaintiff saw that
5 reporters from Fox 11 news were present, filming Plaintiff and other arrestees. Visible
6 in the Fox news footage is a table where Plaintiff saw LASD personnel collecting
7 everyone's property. It appeared to Plaintiff that LASD personnel were not making any
8 attempt to separate the property by individual property owner. Plaintiff did not see his
9 bicycle. After Plaintiff was knocked to the ground and handcuffed, Plaintiff never saw
10 what the deputies did with his bicycle.

11 41. Outside the station, deputies searched Plaintiff Padilla and the others. Deputies
12 took Plaintiff's backpack, bicycle helmet, keys, wallet and his second phone, then took
13 off his handcuffs. (Plaintiff was carrying a second phone that had remained in his pocket.
14 Plaintiff uses his second phone as a personal cell phone.) Plaintiff was taken inside the
15 station and booked (booking number 6008192).

16 42. Plaintiff Padilla's clothing was so covered in the pepper-spray like substance
17 that it was making the LASD booking personnel cough and uncomfortable. The booking
18 personnel had Plaintiff remove his shirt and gave him an LA County Jail t-shirt to wear.

19 43. In the early morning of the next day (September 9) at about 3 or 4 a.m., LASD
20 transferred Plaintiff Padilla to the county jail in downtown Los Angeles. LASD released
21 Plaintiff from the jail at about 10 a.m. on September 9, 2020. LASD personnel would not
22 allow Plaintiff to leave wearing the LA County Jail t-shirt. They made Plaintiff remove
23 the shirt and put on a paper jumpsuit.

24 44. When Plaintiff Padilla was released, LASD personnel gave him a notice to
25 appear for an alleged violation of PC § 409 (unlawful assembly), his wallet and
26 headphones. They also gave Plaintiff a set of keys that were not his. On his own, Plaintiff
27 was able to ascertain and retrieve his keys, while also determining the owner of the keys
28 he was given.

1 45. LASD did not return to Plaintiff Padilla the rest of his property, or inform him
2 how to retrieve the property. Plaintiff's property not returned was: iPhone X cell phone
3 (the phone in Plaintiff's pocket); one Samsung S8 cell phone (the phone Plaintiff was
4 using to livestream); one white Diamondback bicycle with basket; one bicycle helmet;
5 and other miscellaneous items in Plaintiff's backpack.

6 46. The day of Plaintiff Padilla's release, September 9, he went to the South LA
7 station to retrieve the rest of his property. The station appeared closed and was barricaded
8 with yellow metal wire. Plaintiff flagged down a front desk employee who allowed
9 Plaintiff to enter the station. Inside, front desk personnel told Plaintiff they didn't have
10 any of his property. The personnel gave Plaintiff a number to call. Plaintiff called the
11 number. A person, a female, told Plaintiff the property unit had a bicycle which the LASD
12 was holding as evidence. To retrieve the bicycle, the female told Plaintiff to call a
13 detective and given another number. Plaintiff called that number and the detective
14 answered. He put Plaintiff on hold. Plaintiff waited on hold for about 40 minutes before
15 hanging up and calling back. Plaintiff's call went straight to voice mail.

16 47. The notice to appear the LASD gave Plaintiff Padilla set an appearance date at
17 the Inglewood Courthouse for September 11, 2020. When Plaintiff went to court that day,
18 the court clerk told Plaintiff no charges had been filed. The clerk gave Plaintiff a proof
19 of appearance slip. Plaintiff Padilla is informed and believes and based thereon allege that
20 LASD officials issued him the citation even though officials knew, in fact, there was *not*
21 probable cause for Plaintiff's arrest, as confirmed by the LASD notifying the California
22 Department of Justice that Plaintiff's arrest was a "detention only" which is police-speak
23 for no probable cause.

24 48. After court on September 11, the same day Plaintiff Padilla went back to the
25 South LA station. Other arrestees from September 8 were with Plaintiff along with
26 attorney Colleen Flynn. The station was still barricaded. None of the deputies who
27 walked by would acknowledge Plaintiff or the others. Attorney Flynn tried to flag
28 someone down to allow Plaintiff and other to enter the station, to no avail. Some tried

1 calling the station, but Plaintiff is informed, no one answered or responded. Ms. Flynn
2 stated she too called the station but the woman who answered hung up on her.

3 49. Upon his arrest and booking, Plaintiff Padilla provided the LASD personnel a
4 valid mailing address. To this day, Plaintiff has not received any notice for anyone,
5 including the LASD or the County, that his property was being held or how Plaintiff
6 might retrieve his property.

7 *B. The September 25, 2020 Protest, Plaintiff Michael Dodson's Arrest and*
8 *Property Seizures.*

9 50. Plaintiffs Ryan Michael Dodson and Kiyoko Dodson participated in the West
10 Hollywood September 25 protest. Plaintiff Michael Dodson was driving Plaintiffs' Truck,
11 while Plaintiff Kiyoko Dodson was on foot, walking and marching with other
12 demonstrators. Shortly before 10:00 p.m., Ryan Dodson was driving the Truck, leading
13 a group of people walking behind as he drove slowly on Hammond Street before turning
14 onto Sunset Boulevard, headed east. Mr. Dodson was driving the Truck in front so as to
15 protect those on foot behind the Truck from LASD's retaliatory force, such as "rubber
16 bullets" and pepper balls, that Plaintiffs are informed LASD deputies are known to fire
17 indiscriminately at protesters. Plaintiffs are informed and believe and based thereon
18 allege, LASD deputies use this retaliatory force without regard to any actual threat or
19 safety hazard the protesters present.

20 51. On Sunset, Mr. Dodson stopped his Truck to permit those on foot behind the
21 Truck, to catch up. An LASD armored transport then pulled up and stopped in front of
22 Mr. Dodson's Truck. Deputies ordered Mr. Dodson out of his Truck; Mr. Dodson
23 peacefully and promptly complied. The deputies rushed Mr. Dodson, seizing him as they
24 roughly slammed him up against his Truck. Deputies searched and handcuffed him,
25 before placing him in a patrol car.

26 52. LASD deputies transported Ryan Dodson to the West Hollywood station where
27 he was booked and jailed (booking number 6019287). Deputies also directed that his
28 Truck be seized. At the deputies' direction, defendant All City Tow, the LASD's contract

1 towing and vehicle storage agent, towed the Truck. Plaintiffs are informed and believe
2 and based thereon allege that the Truck presently sits in the All City Tow's storage lot.
3 According to a press release Plaintiffs are informed was based on information provided
4 by the LASD, deputies had the Truck seized "in order to protect safety for protestors,
5 community members, and the commercial area."

6 53. Mr. Dodson, who works as an electrician and construction worker, is his
7 family's sole means of support. The Truck is Mr. Dodson's work vehicle. When LASD
8 seized the Truck, it was carrying about \$7,000 worth of Mr. Dodson's work tools.
9 Consequently, without the Truck and tools, Mr. Dodson cannot work. Furthermore, inside
10 the Truck when LASD deputies seized it, was Ms. Dodson's knapsack. The knapsack
11 contained her personal items such as credit and debit cards, identification and about \$500
12 in cash. Also inside the Truck was Ryan Dodson's smartphone.

13 54. Ryan Dodson was booked on two misdemeanor charges: Cal. Pen. Code § 407
14 (failure to disperse) and C.V.C. § 23103(a) (reckless driving). He was issued a citation
15 and released from custody the day after his arrest, September 26, at about 3:00 p.m. The
16 citation states Ryan Dodson must appear in court on or before January 27, 2021. A check
17 of the Superior Court's website shows that as of today, no charges have been filed against
18 him. According to District Attorney Jackie Lacey, her office will *not* be file any § 407
19 charge (failure to disperse) against Ryan Dodson (see **Exhibit A**).

20 55. Upon his release LASD did *not* return to Ryan Dodson any of his personal
21 proper, including his smartphone, that was inside the Truck when LASD seized it the day
22 before. Moreover, during his booking Ryan Dodson provided a valid mailing address. Yet
23 at no time since his arrest has the LASD or anyone else provided notice to either Plaintiff
24 of the property the LASD is holding (other than the Truck). Plaintiffs are informed and
25 believes and based thereon alleges that the LASD has *not* sought any review, judicial or
26 otherwise, for their continuing seizure and confiscation of Plaintiffs' property.

27 56. Beginning the day of Ryan Dodson's release from custody and continuing for
28 days thereafter, Plaintiffs sought to obtain their Truck or, at least, their personal property

1 (the tools, Ryan Dodson’s smartphone, Kiyoko Dodson’s knapsack etc.) in the Truck.
2 Personnel from All City Tow and the Entity defendants told Plaintiffs that neither the
3 Truck nor the items of personal property would be released; that they are supposedly
4 subject to an “evidence hold.” For what crime or crime, defendants refuse to say.

5 57. Following the Dodson Plaintiffs’ unsuccessful efforts, attorneys acting on their
6 behalf contacted defendants, seeking the release of Plaintiffs’ property. Defendants
7 continued to refuse to do so, again claiming the property is “evidence.” Even though the
8 Dodson Plaintiffs’ attorneys informed the Entity defendants and Villanueva that the
9 continuing withholding of Plaintiffs’ property without a warrant or an exception to the
10 warrant requirement violates Plaintiffs’ Fourth and Fourteenth Amendment rights, these
11 defendants both refuse to return or release the property, refuse to seek any judicial review,
12 and refuse to provide Plaintiffs any means at which they can contest defendants’ refusal
13 to release Plaintiffs’ property.

14 58. Notwithstanding the supposed evidence hold (which is contrary to what was
15 stated in a West Hollywood press release that Plaintiffs are informed was based on
16 LASD-supplied information) defendant All City Tow states it intends to sell Plaintiffs’
17 Truck at a lien sale on November 4, 2020. See **Exhibit I**. In response to this notice of
18 intended lien sale, through their attorney the Dodson Plaintiffs have demanded that
19 defendant All City Tow confirm in writing that it will *not* sell the Truck at a lien sale; as
20 of the date this complaint has been filed, defendant All City Tow has refused to provide
21 any written confirmation that the Truck will not be sold.

22 *B. Plaintiffs’ Arrests and Seizures of Plaintiffs’ Property, Were Condoned And/Or*
23 *Ratified by Policy Makers for Defendants LA County and LASD.*

24 59. Plaintiffs are informed and believe and based thereon allege that on or before
25 September 8, 2020, one or more policy makers for LA County and/or LASD, decided that
26 LASD personnel could and should arrest individuals present at demonstrations that LASD
27 had declared unlawful, without regard to evidence showing that the individuals had failed
28 to disperse or had committed unlawful acts that justify arrest. In other words, the policy

1 makers decided that mere presence at or near a demonstration declared unlawful, could
2 and would justify an arrest.

3 60. Plaintiffs are informed and believe and based thereon allege that on or before
4 September 8, 2020, one or more policy makers for LA County and/or LASD, also decided
5 that for persons as described above, those persons could and should be subjected to
6 serious injuring force like that directed against the person without any warning, even
7 though (a) the person had not committed a crime, (b) was not fleeing, and (c) was not
8 threatening harm to anyone.

9 61. Plaintiffs are further informed and believe and based thereon allege that on or
10 before September 8, 2020, one or more policy makers for LA County and/or LASD,
11 decided that for persons arrested as described above, the LASD should take and withhold
12 the person's personal property -- particularly smartphones -- and *not* release or return the
13 property to the owners upon their release from custody. Plaintiffs are informed and
14 believe that the pretextual reason LASD decided upon to refuse to return persons'
15 property, was that the property would be held as "evidence."

16 62. In fact, Plaintiffs are informed and believes that LASD personnel know or
17 should know that the property the LASD is withholding is *not* evidence of crime. Instead,
18 the true reason for LASD's refusal to return to persons their property the LASD seized --
19 Plaintiffs Dodson's Truck and all Plaintiffs' smartphones -- is to punish persons for
20 having some connection to a protest that LASD had declared unlawful, and/or because
21 the LASD was upset that the Los Angeles County District Attorney had announced her
22 office would *not* file charges for failure to disperse citations issued to persons like
23 Plaintiffs (see **Exhibit A**).

24 63. Plaintiffs are informed and believe that the LASD's ongoing refusal to (a)
25 return to persons their property the LASD seized -- in particular smartphones -- (b) seek
26 judicial review for justification for continuing to withhold the property from the owners,
27 and (c) provide notice and opportunity for the property owners to contest the continued
28 withholding of their property, has been approved and/or ratified by one or more policy

1 makers for LA County and/or LASD.

2 64. Plaintiffs informed and believe and based thereon allege that one of the policy
3 makers referenced above, is defendant Villanueva.

4 *C. Class Action Claim.*

5 65. Plaintiffs bring this action on her own behalf, and on behalf of the class of all
6 persons similarly situated, pursuant to Rule 23(b)(2), Federal Rules of Civil Procedure.
7 The class covers all persons arrested by LASD at protests like the ones Plaintiffs attended
8 on September 8 and 25, 2020, and whose items of personal property the LASD seized
9 without a warrant or other judicial review, and for whom the LASD refuses to return or
10 release the property to its owners despite the absence of justification for continuing to
11 seize and hold the property without judicial review, and without giving notice and
12 opportunity to be heard by property owners who seek to reclaim their property. Each
13 named Plaintiff is a proposed class representative.

14 66. On information and belief, the class is comprised of many dozens of
15 individuals, numbering perhaps over 100. The members of the classes are so numerous
16 that joinder is impracticable.

17 67. Questions of law and fact common to each class include:

18 A. Whether the seizures and continued retention of Plaintiffs and class
19 members' items of personal property without a warrant or any judicial review,
20 violates the Fourth, Fifth and/or Fourteenth Amendment.

21 B. Whether defendants' refusal to provide any notice of any kind for the
22 continuing seizure of Plaintiffs' property, violates the Fourth and Fourteenth
23 Amendments.

24 C. Whether defendants' refusal to provide any hearing of any kind at which
25 class members can contest the continuing seizure of Plaintiffs' property, violates
26 the Fourteenth Amendment.

27 D. Whether defendants' continuing seizure of Plaintiffs and class members'
28 items of personal property is intended as punishment for having exercised their

1 associational and First Amendment rights?

2 68. Plaintiffs' claims are typical of the claims of members of each class on whose
3 behalf they act as class representatives, in that as with each class member, Plaintiffs'
4 personal property items were seized without a warrant; the LASD is continuing to
5 withhold the property without any judicial review; and without LASD providing any
6 notice or review procedure at which Plaintiffs could reclaim their property.

7 69. Plaintiffs will fairly and adequately protect the interests of each class on whose
8 behalf they are acting as class representatives. Plaintiffs have no interest which is now
9 or may be potentially antagonistic to the interests of each class member on whose behalf
10 Plaintiffs are acting as class representatives. As with all class members, items of
11 Plaintiffs' personal property were seized following arrests at a protest event, and are
12 being withheld from them without any judicial review or review of any type for that
13 matter.

14 70. In accordance with Fed.R.Civ.P. Rule 23(b)(1)(A), prosecutions of separate
15 actions by individual members of each class would create a risk that is inconsistent or
16 varying adjudications with respect to individual members of the class would establish
17 incompatible standards of conduct for the parties opposing the class.

18 71. In accordance with Fed.R.Civ.P. Rule 23(b)(1)(B), prosecutions of separate
19 actions by individual members of the class would create a risk of adjudications with
20 respect to individual members of the class which would, as a practical matter,
21 substantially impair or impede the interests of the other members of the class to protect
22 their interests.

23 *D. Appropriateness of Equitable Relief.*

24 72. Plaintiffs and class members do not have an adequate remedy at law. The
25 continuing seizure of the items of personal property without a warrant or any review,
26 judicial or otherwise, constitutes ongoing violations Plaintiffs' and class members' Fourth
27 and Fourteenth Amendment rights guaranteeing that all property seizures must be
28 reasonable and at some point (either pre- or post-seizure) subject to judicial or at least

1 quasi-judicial review. The ongoing seizures are causing continuing, sweeping and
2 irreparable harm to Plaintiffs and class members by depriving Plaintiffs and class
3 members of property such as smartphones and vehicles that are often essential for
4 Plaintiffs and class members' daily activities.

5 73. Plaintiffs and class members are also entitled to declaratory relief with respect
6 to the constitutionality of the continuing seizures without warrants or review of any type,
7 judicial or otherwise, and an injunction commanding defendants to (a) release and return
8 the property of Plaintiffs and class members or, alternatively, (b) provide prompt judicial
9 review in compliance with due process guarantees at which Plaintiffs and class members
10 can contest the ongoing seizures without warrants of Plaintiffs and class members' items
11 of personal property.

12 74. Injunctive relief does not raise any mootness issues because the harm alleged
13 may be revisited on the class where it is capable of repetition, yet evading review due to
14 the transitory nature of Plaintiffs' claims. *County of Riverside v. McLaughlin*, 500 U.S.
15 44, 51-52 (1991).

16 **COUNT ONE**

17 (Injunctive Relief -- By Plaintiffs and Class Members

18 As Against All Defendants)

19 (42 U.S.C. § 1983/ Fourth & Fourteenth Amendments)

20 75. By this reference, Plaintiffs, on behalf of themselves and members of the class
21 they represent, re-allege and incorporate all previous and following paragraphs as if fully
22 set forth herein.

23 76. The present ongoing seizures of items of personal property -- including
24 smartphones and the Dodson Plaintiffs' Truck -- without warrants or any review, judicial
25 or otherwise, violates the Fourth Amendment proscription against unreasonable seizure,
26 and the Fourteenth Amendment prohibition against the confiscation of property without
27 due process of law.

28 77. The acts alleged herein were the product of a custom, practice and/or policy of

1 the Entity defendants personally approved by defendant Villanueva, which custom,
2 practice and/or policy caused the constitutional violations alleged herein.

3 **COUNT TWO**

4 (Damages Claim -- By Individual Plaintiffs Only As Against All Defendants

5 *except* defendant All City Tow)

6 (42 U.S.C. §1983 / Fourth & Fourteenth Amendments)

7 78. By this reference Plaintiffs, on behalf of themselves only, re-alleges and
8 incorporates all previous and following paragraphs as if fully set forth herein.

9 79. The continuing seizure of Plaintiffs' items of personal property without a
10 warrant or judicial review of any kind, is depriving Plaintiffs of property in violation of
11 the Fourth and Fourteenth Amendments. Therefore, Plaintiffs are entitled to recover
12 compensatory damages proximately caused by the property seizures, as against all
13 defendants *except* for defendant All City Tow.

14 80. The acts alleged herein were the product of a policy or custom of the Entity
15 defendants and personally approved by defendant Villanueva as alleged above, and
16 entities Plaintiffs to recover punitive damages as against individual defendants.

17 **COUNT THREE**

18 (Damages Claim -- By Plaintiffs Only As Against Entity Defendants Only)

19 (42 U.S.C. §1983 / Fifth Amendment)

20 81. By this reference Plaintiffs, on behalf of themselves only, re-allege and
21 incorporate all previous and following paragraphs as if fully set forth herein.

22 82. By seizing Plaintiffs' items of personal property and not returning them despite
23 Plaintiffs' repeated requests, the Entity defendants physically took possession of
24 Plaintiffs' property ostensibly for a public purpose of punishing Plaintiffs for their mere
25 presence at the September 8 and 25, 2020 protests. Defendants, however, have not
26 compensated Plaintiffs but instead, effected a *de facto* forfeiture of Plaintiffs' property.
27 Consequently, the seizures without any judicial review constituted a "Taking" within the
28 meaning of the Takings Clause of the Fifth Amendment to the United States Constitution.

1 83. Defendants’ property seizures constituted a final decision. Per the policies
2 described above, the Entity defendants have not provided any review process, judicial or
3 otherwise, to challenge the property seizures.

4 84. Because the Entity defendants effected a Taking of personal property without
5 payment of compensation, Plaintiffs are entitled to recover the reasonable value of their
6 property defendants seized.

7 **COUNT FOUR**

8 (Damages Claim -- By Plaintiffs Astorga, Padilla and Ryan Dodson Only

9 As Against All Defendants *except* defendant All City Tow)

10 (42 U.S.C. §1983 / Fourth Amendment)

11 85. By this reference Plaintiffs, on behalf of themselves only, re-allege and
12 incorporate all previous and following paragraphs as if fully set forth herein.

13 86. The seizure of Plaintiffs Astorga and Padilla by unknown LASD deputies on
14 September 8, 2020, and the seizure of Plaintiff Ryan Dodson by unknown LASD deputies
15 on September 25, 2020, violated their Fourth Amendment rights against unreasonable
16 seizures by:

17 A. Subjecting each Plaintiff to excessive force even though (a) Plaintiff had
18 not committed a crime and was not threatening harm to anyone;

19 B. Arresting each Plaintiff in the absence of probable cause that the Plaintiff
20 had committed any crime.

21 87. The acts alleged herein were the product of a policy or custom of the Entity
22 defendants and personally approved by defendant Villanueva as alleged above, thereby
23 entitling Plaintiffs to recover punitive damages as against individual defendants.

24 ///

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PRAYER

1
2 WHEREFORE, Plaintiffs respectfully request that this Court grant the following
3 relief:

4 *On The First Cause of Action:*

5 88. That the Court certify this case pursuant to F. R. Civ. P. 23(b)(2) as a class
6 action on behalf of a class composed of individuals whom the LASD arrested at protests
7 in 2020 and whose personal property the LASD seized, in the course of booking these
8 individuals, and continues to maintain possession of the property despite no lawful
9 justification for doing so;

10 89. That the Court issue a declaration that the ongoing seizures of items of personal
11 property belonging to Plaintiffs and class members violate the Fourth and Fourteenth
12 Amendments to the United States Constitution;

13 90. That the Court issue a temporary restraining order, preliminary and permanent
14 injunction on behalf of Plaintiffs and class members commanding defendants, and each
15 of them, to release to Plaintiffs and class members forthwith, their items of personal
16 property seized without a warrant or judicial review, upon the request of Plaintiffs and
17 class members that they be given their property;

18 91. That this Court award Plaintiffs attorneys fees and costs incurred in this action
19 under 42 U.S.C. § 1988, and any other appropriate statute;

20 *On The Second, Third and Fourth Causes of Action:*

21 92. That this Court award Plaintiffs compensatory damages, according to proof;

22 93. That as against any individual defendant, that Plaintiffs be awarded punitive
23 damages according to proof;

24 94. That this Court award attorneys' fees and costs under 42 U.S.C. § 1988, and
25 any other appropriate statute;

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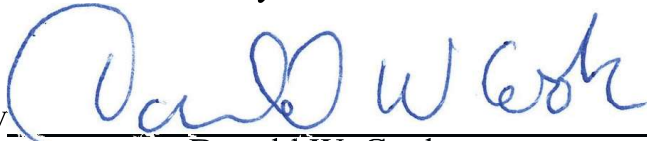
On All Causes of Action:

95. That the Court award costs of suit; and

96. And such other relief as the Court deems appropriate.

DATED: October 29, 2020

COLLEEN FLYNN
PEDRAM ESFANDIARY
MONIQUE ALARCON
DONALD W. COOK
Attorneys for Plaintiffs

By 
Donald W. Cook

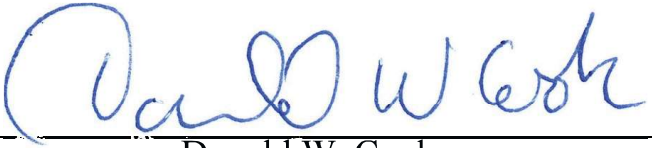
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DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a jury trial.

DATED: October 29, 2020

**COLLEEN FLYNN
PEDRAM ESFANDIARY
MONIQUE ALARCON
DONALD W. COOK**
Attorneys for Plaintiffs

By 
Donald W. Cook

Jackie Lacey
District Attorney
<http://da.lacounty.gov>



NEWS RELEASE

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RSantiago@da.lacounty.gov
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June 8, 2020

**District Attorney Jackie Lacey Will Not File Charges
for Curfew Violations, Failure to Disperse**

Los Angeles County District Attorney Jackie Lacey announced today that she will not file charges against any protester for a curfew violation or failure to disperse.

She directed her legal staff to decline to prosecute these cases in the interest of justice.

“I believe whole-heartedly in free speech and support the right of protesters to demonstrate peacefully against historic racial injustice in our criminal justice system and throughout our nation,” District Attorney Lacey said. “I want to encourage the exchange of ideas and work to establish dialogue between law enforcement and protesters so that we may implement enduring systemic change.”

The District Attorney’s Office prosecutes all felonies in Los Angeles County and misdemeanors that occur in the unincorporated areas of the county and in most cities.

These 10 cities prosecute misdemeanors that occur in their jurisdictions: Los Angeles, Long Beach, Santa Monica, Pasadena, Torrance, Burbank, Inglewood, Hawthorne, Hermosa Beach and Redondo Beach.

[About the Los Angeles County District Attorney's Office](#)

Los Angeles County District Attorney Jackie Lacey leads the largest local prosecutorial office in the nation. Her staff of nearly 1,000 attorneys, 300 investigators and 800 support staff members is dedicated to protecting our community through the fair and ethical pursuit of justice and the safeguarding of crime victims' rights.



Injury photo (backside, lower)

EXHIBIT B



Injury Photo (lower left side / buttocks)

EXHIBIT C



Injury Photo (left arm / elbow)

EXHIBIT D



Injury Photo (left forearm)

EXHIBIT E

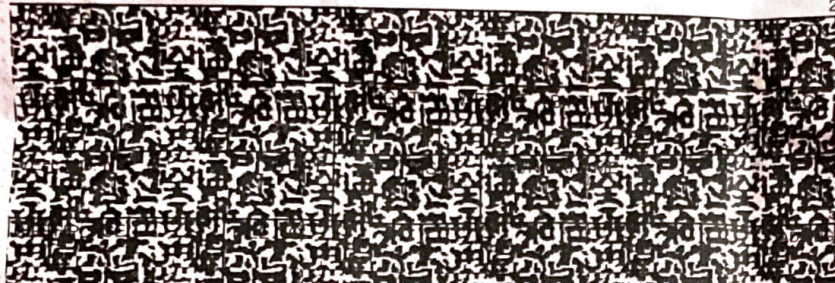
LOS ANGELES COUNTY JAIL
BOOKING AND PROPERTY RECORD

HAVE VD	<input type="checkbox"/>	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
HAVE HEPATITIS	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>
HAVE TB	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>
EVER HAVE TB	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>

BOOKING NO.	LOC BKD.	DR. LIC. NO.	STATE
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PRISONER'S RECEIPT

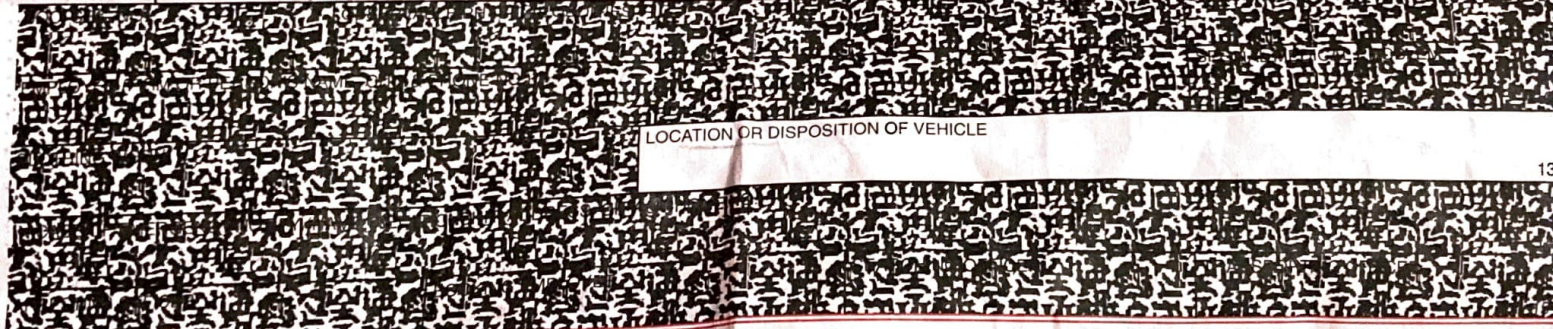
ARRESTEE'S NAME (LAST, FIRST, MIDDLE)



AG'Y. OR DETAIL ARRESTING	DATE & TIME ARRESTED	TIME BKD.
LOCATION OF ARREST	TOTAL BAIL	
CHARGE	WARR./COMM. NO.	

JAIL LOC.	ARRAIGN. DATE	TIME	COURT
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PRISONER'S SIGNATURE WHEN BOOKED



LOCATION OR DISPOSITION OF VEHICLE

CASH RETAINED	PROPERTY
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PRISONER'S SIG., FOR REC'T. OF FOREGOING CASH & PROPERTY
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CASH DEPOSITED	PROPERTY
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PRISONER'S SIG., FOR REC'T. OF REMAINING CASH & PROPERTY
--

ASTORIA CHRISTINA RODRIGUEZ 6008199
Last Name First Middle Booking Number
Los Angeles CA
Street City Zip
409 pc/m 920-09755-0378-399
Charge File Number

I AGREE TO APPEAR IN PERSON IN THE BELOW INDICATED COURT ON THE DATE AND TIME SPECIFIED BELOW, AND AT SUCH OTHER TIMES AS THE COURT SHALL THEREAFTER DIRECT, AND I WILL OBEY ALL OTHER LAWFUL ORDERS OF THE COURT. I ALSO AGREE THAT IF I FAIL TO APPEAR AT THE TIME AND PLACE AGREED, OR AS DIRECTED BY THE COURT, AND I AM APPREHENDED OUTSIDE THE STATE OF CALIFORNIA, I WILL, AND I DO, HEREBY WAIVE EXTRADITION PROCEEDINGS. I AM AWARE THAT THE COURT MAY AT ANY TIME, IN ITS DISCRETION, REVOKE THE ORDER FOR RELEASE; THAT WILLFUL FAILURE TO APPEAR ON THE BELOW DATE OR AT SUCH TIME OR TIMES AS DIRECTED BY THE COURT IS PUNISHABLE AS A SEPARATE FELONY OFFENSE.

PROMETO APARECER EN PERSONA EN LA CORTE INDICADA ABAJO Y EN LA FECHA Y TIEMPO ESPECIFICADO ABAJO Y EN TALES OTROS TIEMPOS COMO LA CORTE DESPUES ORDENE, YE OBEDECERE TODAS LAS OTRAS ORDENES LEGALES DE LA CORTE. TAMBIEN, PROMETO QUE SI DEJO DE APARECER EN EL TIEMPO Y LUGAR CONVENIDO Y ORDENADO POR LA CORTE, Y SOY ARRESTADO FUERA DEL ESTADO DE CALIFORNIA RENUNCIARE Y AQUI RENUNCION PROCESOS DE EXTRADICCION. RECONOZCO QUE LA CORTE PUEDE EN CUALQUIER TIEMPO A SU DISCRECION REVOCAR LA ORDEN DE LIBERTAD, Y FALTA VOLUNTARIA DE APARECER EN LA FECHA ABAJO MENCIONADA O EN TAL TIEMPO O TIEMPOS SEGUN ORDENADO POR LA CORTE, ES CASTIGADO COMO UNA OFENSA APARTE DE FELONIA. AL FIRMAR ESTA FORMA Y SIN ADMITIR CULPA YO PROMETO PRESENTARME ANTE LA CORTE QUE SE INDICA ABAJO.

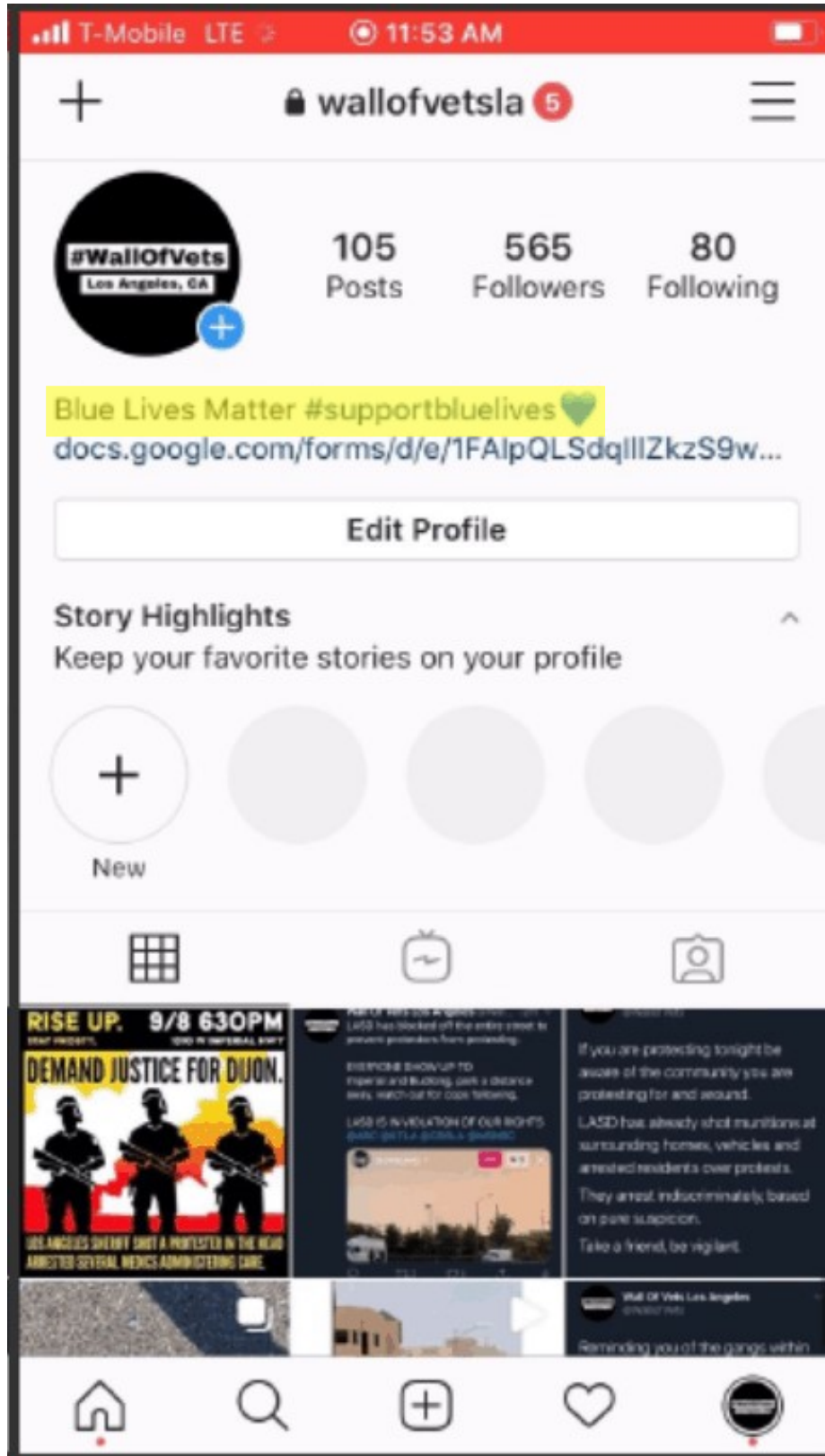
WITHOUT ADMITTING GUILT, I PROMISE TO APPEAR BEFORE THE COURT AT THE TIME, DATE, AND LOCATION INDICATED BELOW.

8:30 ^{AM} ~~PM~~ on the 6th day of JANUARY, 2021


SIGNATURE OF RELEASEE

INGLEWOOD ONE REGENT ST INGLEWOOD CA 90301
Court Address Street City

Judge/Commissioner authorizing release _____ Teletype Number _____
ARMSTRONG _____
Executed in the presence of releasing officer Employee Number 53111 Date/Time 09/09/20



Screenshot "WallofVetsLA"

EXHIBIT H



TO WHOM IT MAY CONCERN:

- This is to notify you that I intend to sell this vehicle at a Lien Sale (public sale) because my towing, storage, or repair bill has not been paid. You may wish to take one of the following actions:
1. Pay my bill and reclaim the vehicle before the sale date.
 2. Stop the sale and dispute the lien in court. You may stop the sale by completing the Declaration of Opposition below and forwarding this notice to the DMV in the enclosed envelope within 10 days of the date this notice was mailed.
 3. Disregard this notice if you no longer own or want this vehicle so I can proceed with the sale. However, if you are the last owner of record, you may be liable for removal and disposition costs and lien not satisfied by sale of the vehicle.

NOTE TO THE LIENHOLDER:

This notice is to be sent to the registered owner, legal owner, Department of Motor Vehicles, and any other person interested in this vehicle, 31 to 41 days before the date of sale (do not count day notice mailed). Send notice certified mail, return receipt requested, or U.S. Postal Service Certificate of Mailing.

EXCEPTION: Notice to the department must be sent by certified mail, return receipt requested.

At least 10 days before the sale, a copy of this notice shall be posted in a conspicuous place on the premises of the business office of the lienholder, and if the sale occurs at a place other than the business office, a notice must be posted at the site of the forthcoming sale.

VEHICLE DESCRIPTION	LICENSE NUMBER	STATE REGISTERED	LICENSE EXPIRATION DATE	VEHICLE IDENTIFICATION NUMBER (VIN)
	7T77523	CA	02/28/2021	2GCEC13TX51249605
	MAKE	YEAR	MODEL	BOOY TYPE
	CHEV	05	P/U	PK
	ENGINE NUMBER (MOTORCYCLES ONLY)			

INFORMATION ABOUT MY LIEN	DATE VEHICLE CAME INTO MY POSSESSION	DATE OWNER BILLED SERVICES/STORAGE	DATE WORK OR SERVICES COMPLETED	MY TOWING AND STORAGE WAS AUTHORIZED BY A PUBLIC AGENCY
	09/25/2020	09/29/2020	09/25/2020	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
The amount and basis for my lien and outstanding parking violation bill is:				
STORAGE TO DATE	AT THE RATE OF	TOWING	REPAIRS	PARKING VIOLATIONS (CVC 22851.1)
\$ 325.00	\$ 65.00 PER DAY	\$ 417.50	\$ 0.00	\$ 70.00

INFORMATION ABOUT THE SALE	The vehicle will be available for inspection at least one hour prior to the sale			
	DATE NOTICE OF SALE WAS MAILED	DATE OF SALE	HOUR OF SALE	
	09/29/2020	11/04/2020	10AM am pm	
	LOCATION OF SALE (STREET ADDRESS)		CITY	STATE ZIP CODE
	5832 WEST ADAMS BLVD		CULVER CITY	CA 90232

CERTIFICATION	I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct and I have no information or belief that there is a valid defense to the claim which gives rise to the lien. I further certify (or declare) under penalty of perjury that the lien sale was conducted in accordance with the requirements of California Military and Veterans Code §§407, 408, 409.1, and 409.3, and with the requirements of §§3952, 3953, and 3958 of Title 50 of the United States Code.			
	DATE	SIGNATURE OF LIENHOLDER AGENT ACTING FOR LIENHOLDER		
	09/29/2020	X ALL CITY TOW SERVICE By DW		
	LIENHOLDER (NAME)	TELEPHONE NUMBER	BUREAU OF AUTOMOTIVE REPAIR NUMBER	
	ALL CITY TOW SERVICE	(323) 934-0404		
	CITY	STATE	ZIP CODE	
	5832 WEST ADAMS BLVD	CULVER CITY	CA	90232
	AGENT ACTING FOR LIENHOLDER (NAME)	TELEPHONE NUMBER	REGISTRATION SERVICE NUMBER	
	DENCO LIEN SALES, INC	(626) 914-0510	53873	
	ADDRESS	CITY	STATE	ZIP CODE
	P.O. BOX 1921	GLENDORA	CA	91740

DECLARATION OF OPPOSITION (Must be sent to DMV within 10 days of date notice of sale mailed)	TO: DEPARTMENT OF MOTOR VEHICLES Please stop the lien sale of this vehicle because I wish to contest the claim of the lienholder. I understand the lienholder may file an action in court and if judgment is given in his/her favor, I may be liable for the court costs. The address at which I may be served or notified in person of any court action is:			
	PRINT TRUE FULL NAME	TELEPHONE NUMBER		
		()		
	ADDRESS	CITY	STATE	ZIP CODE
	MAILING ADDRESS IF DIFFERENT FROM ABOVE			
	I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.			
	DATE	SIGNATURE		
		X		
	ATTENTION: This Declaration of Opposition will not be valid unless you have signed, provided your true full name, and a valid address. If the lienholder is unable to serve you with a court action, he/she will be allowed to continue with the lien sale (Civil Code 3072).			

REGISTERED OWNER

DODSON RYAN M 5439 DIRK CIRCLE LA PALMA, CA 90623

LEGAL OWNER

--

Department of Motor Vehicles
Lien Sales Unit
P. O. Box 932317
Sacramento, CA 94232-3170

Bundled with Cert#
70190140000098171268

INTERESTED PARTIES

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