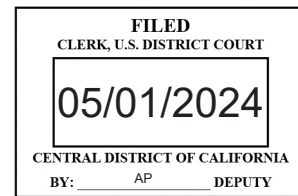


RELATED DDJ



1 Lynn Macy "In Pro Per"
 2 P.O. Box #103
 3 Twin Peaks, CA 92391
 Phone #: (909) 744 -8480
 E-mail: macybuilders@yahoo.com

4 THE UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA EASTERN DIVISION

5 LYNN MACY, as an individual,

Case No.: 5:24-cv-00930-KK(DTB)

6 PLAINTIFF,

COMPLAINT FOR DAMMAGES AND
DEMAND FOR JURY TRIAL:

7 vs.

8 SAN BERNARDINO COUNTY SHERIFF'S
 9 DEPARTMENT TWIN PEAKS PATROL
 STATION, a public entity,

- (1) Police Misconduct.
- (2) Emotional Distress.
- (3) Cover up.
- (4) Failure to do Public Record's Requests.
- (5) Municipal and Supervisory Liability (42 U.S.C. § 1983).
- (6) Negligence.
- (7) Conspiracy.

10 DEFENDANT.

[DEMAND FOR JURY TRIAL]

16 ***"When a man assumes a public trust, he should consider himself as public property, & justly liable to the inspection & vigilance of public opinion; & the more sensibly he is made to feel his dependence, the less danger will there be of his abuse of power — The abuse of power, that rock on which good governments, & the people's rights, have been so often wrecked." - Thomas Jefferson (U.S. Constitution)***

20 PLAINTIFF LYNN MACY, through their undersigned counsel, hereby files
 21 this Complaint against Defendant San Bernardino County Sheriff's Department
 22 Twin Peaks Patrol Station, inclusive (collectively "County Sheriff Officers"),
 alleges as follows:

JURISDICTION AND VENUE

- 24 1. This Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and
 25 1343(a)(3-4) because Plaintiffs assert claims arising under the laws of the
 26 United States including 42 U.S.C. §§ 1983 & 1985, the Fourth & Fourteenth
 27 Amendments of the United States Constitution. This court has
 supplemental jurisdiction over state law claims pursuant to 28 USC § 1367

1 because those are so related to PLAINTIFF's federal claims that the
2 claims form part of the same case and/or controversy pursuant to Article
3 Ill of the United States Constitution.

- 4 2. Venue is properly founded in this judicial district pursuant to 28 USC §§
5 1391(b) and (c) in that a substantial part of the events giving rise to the
6 claims in this action occurred within this District and Defendants are
7 subject to personal jurisdiction in this district.

8 **PARTIES**

- 9 3. PLAINTIFF LYNN MACY, is a citizen of the State of California, and at all
10 relevant times herein was a resident in San Bernardino County in the
11 State of California.
12 4. Defendant San Bernardino County Sheriff's Department Twin Peaks Patrol
13 Station is and at all times relevant a public entity located in the County
14 of San Bernardino and existing under the laws of the State of California.

15 **FACTS COMMON TO ALL CAUSES OF ACTION**

- 16 5. Each and every allegation set forth in each and every averment and
17 allegation of this pleading hereby is incorporated by this reference in
18 each and every averment and allegation of this pleading.
19 6. I am informed and believe that on 7/31/20 someone put a "FREE" sign on
20 Plaintiff's ornate fences (1st saw the sign when Plaintiff arrived at
21 MacyLand property around 11:30 AM). Plaintiff took a picture of the sign,
22 then took it off. Later, on the same day, after Plaintiff & Family cleaned
23 MacyLand property around 6 PM, drove up, & saw another "FREE" sign
24 on Plaintiff's fences again. Macy Family took a picture then took the
25 "FREE" sign down again. Macy Family also informed the neighbor across
26 the street, named Susan to be on the lookout for who is putting the
27 "FREE" sign on our fences. Plaintiff called 911 and Defendants never
28 showed up.
7. I am informed and believe that at around 8 PM on 7/31/20, Plaintiff &
Family saw a black Subaru car [#1]; license plate #AZ08V93 parked on
Plaintiff's private property. (Trespassing, abandoned vehicle, no rear or
front license plate existed, citizen's arrest, unknown owner, stolen
vehicle?) Plaintiff & Family called 911. When Plaintiff & Family was calling,
a young black man walked up & threatened Plaintiff & Family saying,
"You better back off or I will knock your ass out!" A black older man,
neighbor with a pointed spade shovel in hand, came up & said, "You
need back up?" Then young black male criminal drug dealer got into

1 Subaru car & zoomed away super-fast. 5-7 minutes later. After a big 4x4
2 white truck [#2] with the license plate #61870W2 sped by the Plaintiff &
3 Family's red truck; past Plaintiff's private property dirt road. Minutes later
4 big white truck turned back around, drove by Plaintiff & family illegally
5 fast again. Around 9 PM, Plaintiff & Family was driving home & saw the
6 same big white truck & black Subaru; at the corner of Mojave River RD &
7 Crest Forest Drive, Cedarpines Park, CA 92322. Plaintiff's son Jeff Macy
8 called 911 again for help. While Plaintiff's son Jeff Macy was on the
9 phone, another sports car [#3] coming from Crest Forest Drive & a green
10 jeep [#4]; driven by the neighbor black man coming from Mojave River
11 RD showed up. The green jeep blocked, detained, & prevented Plaintiff
12 & Family from escaping or driving away. Intentionally blocked behind
13 Plaintiff & Family truck, so family could not escape! White truck & sports
14 car parked in front of Macy Family truck. The young black criminal male
15 eventually got out of the white truck, jumped into the black Subaru [#1]
16 with no license plates, then high speed, illegally sped away on Crest
17 Forest Drive. The green jeep [#4] backed out quickly & drove back to his
18 house on Mojave River RD. The white truck [#2] & sports car [#3] left
19 downhill on Crest Forest Dr. Plaintiff & Family waited for a while for fear of
20 lives. Defendant's County Sheriffs never showed up or called Plaintiff &
21 family back.

22 8. I am informed and believe that on 8/4/20 at around 10:30 AM,
23 Defendant's County Sheriff Officer pulled Plaintiff & Family over on
24 Mojave River RD. Defendant's County Sheriff Officer stopped Plaintiff &
25 Family for more than 30 minutes, asking several questions like, "How
26 much is your 36-acre lake view property worth?" Plaintiff's son Jeff Macy
27 replied, "I don't know, probably worth a lot, why? Defendant's Officer
28 also asked, "How many millions is your private property worth?" -At this
point Plaintiff's son Jeff Macy was very concerned! Plaintiff's son Jeff
Macy asked Defendant's Sheriff, "Are you going to investigate our
private property damages?" Then Defendant's County Sheriff refused to
answer question & said, "I have a call & have to go." Defendant's
Officer drove away.

9. I am informed and believe that at around 4 PM on 8/4/20, County Code
Enforcement Officer Pedro Moreno had a badge, showed up, & illegally
detained Plaintiff & family from cleaning up trash. County Code
Enforcement Officer trespassed onto Plaintiff's private property. Plaintiff
called County Code Enforcement to report civil rights violations. County
Officer Pedro illegally took pictures of Plaintiff's red 4x4 Ford truck license

1 plate; full of trash from County CSA-18's illegal dumping for years. Plaintiff
2 & Family called 911, but Defendants never came or called back to
investigate.

3 10. I am informed and believe that on 9/9/20, Plaintiff & Family went over to
4 MacyLand property at around 5 PM & saw cables (that Plaintiff & Family
5 put up to secure MacyLand property's 4 entrances) were cut up in 3
6 different places & on the ground. Plaintiff & Family's glass mason jar lights
7 were scattered & shattered glass was across Plaintiff & Family's private
8 road, creating a hazardous condition. Plaintiff & Family has photos of cut
9 & destroyed cables. San Bernardino County Code Enforcement gave
Plaintiff ticket of violation for hazardous glass & trash on road which was
caused by County. Defendant once again would not show up when
Plaintiff's called 911.

10 11. I am informed and believe that on 9/9/20 Plaintiff & Family were cleaning
11 MacyLand & saw Plaintiff's U.S. FLAG was illegally removed. Plaintiff &
12 Family's Military grade, high quality, parachute material hammocks were
13 destroyed. Plaintiff & Family had 3 different shades of green hammocks
14 which were destroyed, cut by pocket knife multiple times. Shredded
15 Hammocks were left on Plaintiff's Property. Defendants have provided
16 no security for Plaintiff's private property; Defendants are not taking their
17 job seriously & not helping Plaintiff & Family. Plaintiff's 2 rope swings, high
18 quality, expensive thick ropes were stolen. Plaintiff & Family went out to
19 clean up trash that County keeps giving Plaintiff tickets of violations to
20 clean up. Plaintiff & Family called 911, but Defendant's Officers never
21 showed up to investigate or make a report.

22 12. I am informed and believe that there was an abandoned truck vehicle
23 (decrepit truck was on the neighbor's property bordering MacyLand),
24 which was illegally dragged onto Macy Family's property. Plaintiff &
25 Family called the Defendant's County Sheriff & this time 2 Defendant's
26 County Sheriffs came out to make a report, but never followed up with
27 Plaintiff & Family's report. Defendant's County Sheriff Officer Maestas
28 said, "I will be back tomorrow (9/10/20) to talk to the neighbors." Instead
of helping Macy Family tow truck away, Defendant's County Sheriffs
disappeared & never showed up again; no case # was given. There
were clear fresh drag marks on the ground from neighbor's property,
past clearly identified survey markers, over to Plaintiff's private property.
Neighbors were evil & moved abandoned vehicle to MacyLand to make
Plaintiff deal with the neighbor's abandoned truck instead.

1 13. I am informed and believe that on the same 9/9/20 day, Plaintiff's
2 neighbor Mark Eason admitted to shooting rattlesnake with Eason's
3 shotgun on Plaintiff's property. Mark Eason also admitted to placing
4 rattlesnake 10' clearly onto Plaintiff's property; on top of a round log, in
5 plain sight. Eason intentionally placed rattlesnake on Plaintiff's log to
6 intimidate & scare Plaintiff's grandchildren. Plaintiff & Family called 911
7 and Defendant's Officer did come out. Mark Eason even admitted to
8 Defendant's Officer County Sheriff Maestas that Mark Eason shot
9 rattlesnake outside in public, but was not arrested or given a ticket. Case
10 #052001280. County Sheriff Maestas should have arrested Mark Eason for
11 admitting to using shotgun on Plaintiff's Property to kill Rattlesnake &
12 throw on Plaintiff's log. Instead, continued history of failure of duty,
13 negligence, & Police Misconduct. Pattern of County Sheriffs not doing
14 their job. Plaintiff has pictures of dead rattlesnake on log; which
15 Defendant's County Sheriff Maestas refused to dispose of or call animal
16 control for. County Sheriff Maestas is liable, left dangerous situation, &
17 negligence there. Plaintiff's son Jeff Macy even asked County Sheriff
18 Maestas to remove rattlesnake, which County Sheriff Maestas would not
19 do. According to
20 <https://wildlife.ca.gov/Conservation/Reptiles/Rattlesnake>: "DO NOT try to
21 touch or handle a snake, dead or alive. Dead rattlers may still inject
22 venom shortly after death." Rattlesnake bites can cause severe injury or
23 death. Defendant's County Sheriff Maestas kept yelling at Plaintiff's son
24 Jeff Macy; also yelled, "I don't work for you (Jeff Macy)."

18 14. I am informed and believe that on 9/17/20, 2 EHE Surveyors did survey for
19 Plaintiff's property. Plaintiff's daughter-in-law Julie Macy was taking
20 pictures of all survey markers of Plaintiff's property lines put in by EHE
21 Surveyors. Neighbor Linda Koupeny came out & battered Plaintiff's
22 daughter-in-law Julie Macy & Plaintiff's grandson Josiah Macy; with high
23 pressure spray in mouths and noses with water hose in their faces, so they
24 couldn't breathe. EHE Surveyors also witnessed Julie Macy & Josiah
25 Macy getting battered with water hose in their faces. EHE Surveyor
26 Matthew suggested that Julie Macy call the Sheriff. Julie Macy video
27 recorded Neighbor Linda Koupeny's actions & then called the Sheriff.
28 Defendant's County Sheriff Robert Maestas showed up & gave Neighbor
Linda Koupeny ticket for battery instead of arresting Linda Koupeny.
Case #052001326 Linda Koupeny has been charged with battery against
Julie & Josiah Macy on Plaintiff's property, at disputed fence line. Same
day, Plaintiff & Family noticed Plaintiff's fences that were chained &

1 locked to tree on Plaintiff's property were gone & stolen. Plaintiff & Family
2 also reported stolen fences to Defendant's Officer. County Sheriff
3 Maestas said stolen fences would be added to 9/9/20 case, but
4 Defendant's Officer never called Plaintiff & Family back or followed up.

5 15. I am informed and believe that on 10/2/20, Macy Family went to
6 Plaintiff's property at around 3 PM. Plaintiff & Family noticed that
7 Plaintiff's 2 signs, which were mounted on Plaintiff's property corner were
8 removed. Macy Family later found signs & cut down cables; thrown
9 down Plaintiff's property hill. Macy Family called Defendant's County
10 Sheriff. County Sheriff Maestas showed up & said Defendant's Officer
11 would investigate about the signs.

12 16. I am informed and believe that there were 8 Police Misconducts on
13 10/2/20: Police Misconduct #1 County Sheriff Maestas trespassed on
14 Plaintiff's private road, Defendant's Officer was supposed to meet at top
15 entrance of MacyLand property to investigate Macy Family's stolen no
16 trespassing signs/cut cables etc.]. County Sheriff Maestas said, "I noticed
17 the cables have been cut down again", but asked more questions
18 about the broken, trashed, faded 1/2 of sign that neighbor called in
19 saying, Plaintiff's son Jeff Macy took their sign. Police Misconduct #2
20 County Sheriff Maestas instead of helping Plaintiff & Family, which
21 County Sheriff Maestas was called out for: felony, instead turned on
22 Plaintiff & Family; did more investigation about allegation of petty theft
23 broken, trash 1/2 of sign. [Yet told Sheriff was a vacant land owner's sign,
24 who was not around] Macy Family was cleaning up MacyLand property
25 & faded 1/2 of 1 part of a trashed, broken in 1/2 faded sign; lying face
26 down on Plaintiff's property. Plaintiff's son Jeff Macy picked up faded 1/2
27 of sign & threw faded 1/2 of sign in back of dump truck with trash to throw
28 away. Broken up, \$0 value plastic, trash 1/2 of sign was in back of Macy
Family trash truck to take to dump; for County Code Enforcement ticket
fine given to Plaintiff to clean up trash. Defendant's Officer talked more
about the trashed, faded 1/2 of sign Jeff Macy picked up, rather than
Macy Family's signs & cut down cables which he was called out for from
Macy's. County Sheriff Maestas never turned \$0 value plastic, trashed,
faded 1/2 of sign into evidence. Police Misconduct #3 Defendant's
County Sheriff Maestas gave sign to Hearsay neighbor instead of taking
the \$0 value, faded 1/2 plastic, trash sign into evidence. [Required for a
criminal charge] County Sheriff Maestas drove up road to give neighbor
\$0 value plastic, trashed, faded 1/2 of sign! Hearsay neighbor called in,
saying, "Not owner of vacant property lot, but has authority to call on

1 behalf of owner?". Hearsay neighbor had "No Trespassing" sign on
2 unknown vacant lot owner's property. County Sheriff Maestas doesn't
3 even know how to do job, doesn't even understand chain of custody
4 with evidence. Police Misconduct #4 Neighbor admitted to knowing
5 who's illegally dumping trash on Plaintiff's property. County Sheriff
6 Maestas failed to investigate admission of guilt for a neighbor's vacant
7 property. Neighbor should have been arrested for admission of guilt,
8 County Sheriff Maestas did not do follow up investigation or call Plaintiff
9 & Family back. Police Misconduct #5 County Sheriff Maestas cannot
10 charge petty theft for broken up, \$0 value plastic, trashed, faded ½ sign.
11 Police Misconduct #6 County Sheriff Maestas drove down dirt road fast,
12 reckless driving, yelling at Plaintiff's son Jeff Macy in front of family for
13 picking up trash because of County notice. Police Misconduct #7
14 Hearsay Neighbor did a False Police report against Plaintiff & Family.
15 Hearsay neighbor does not even own property that supposed 0 value
16 plastic sign was located on. Plaintiff & Family never met accuser. The
17 original reason Defendant's County Sheriff Maestas was called out, was
18 for Macy Family's signs & cut down cables. Police Misconduct #8 Later,
19 at 5:30 PM an abandoned vehicle trespassed & parked onto Plaintiff's
20 private property; in front of clearly identified "No Trespassing" signs.
21 Blocking Plaintiff's parking entrance. Plaintiff & Family called 911, but
22 Defendant's County Sheriffs never showed up. Plaintiff & Family waited in
23 the cold for over 1 hour, then drove home after realizing County Sheriffs
24 were not going to come.

18 17. I am informed and believe that on 10/16/20, 4 days before Plaintiff &
19 Family put up a top-of-the-line trail, battery operated, self-sufficient
20 camera on tree aimed at Plaintiff's private road to collect evidence for
21 who was stealing Plaintiff's property no trespassing signs. The neighbor
22 Linda Koupeny was watching Macy Family put up camera from window
23 at around 3 PM. Plaintiff & Family went to Plaintiff's property to clean up
24 trash & found out that someone stole the camera put up on 10/12/20.
25 Plaintiff & Family called 911 at 3:11 PM to report stolen camera. Linda
26 Koupeny on Facebook said Koupeny did something about the trail
27 camera right away, Macy's provided evidence of the Facebook post. 2
28 County Sheriffs didn't do anything about the admission of guilt from the
Facebook post. Defendant's 2 County Sheriffs showed up at around 4
PM & talked to Plaintiff's son Jeff Macy. The 2 County Sheriffs were
aggressive & mean. The 2 County Sheriffs tried to turn on Jeff Macy to
say, "Trail camera is looking into neighbor's window"; when the trail

1 camera was aimed at the Plaintiff's private road. The 2 County Sheriffs
2 went to talk to neighbors. County Sheriffs also gave Jeff Macy & Plaintiff's
3 Family permission to clean up trash, which neighbors put on Plaintiff's
4 road to block MacyLand. Defendant's County Sheriffs wrote about
5 stolen camera & trash on the report, but did not give police report to
6 Plaintiff & Family. San Bernardino County Code Enforcement gave Macy
7 Family ticket of violation for trash neighbors put on Macy Family's road.

8 **18.** I am informed and believe that on **10/24/20**, Plaintiff & Family went over
9 to MacyLand at around 1 PM & the pole with written "Macy Land" sign
10 was stolen (on the corner of Plaintiff's property.) Jeff Macy called **911**.
11 Defendant's County Sheriff came over to take the report. Case
12 **#052001506** Sheriff left scary skeleton on Plaintiff's property. Plaintiff owns
13 deck, which witchcraft sign, skeleton, "crazy cat lady" sign are on. All
14 County Sheriff said was, "it is civil, I can't do anything about it". Plaintiff &
15 Family is being bullied & intimidated. Linda Koupeny "Crazy Cat Lady"
16 threatened, "I will kill you (Jeff Macy) if you ever touch or get near my
17 cats." Neighbors purposely leave "Crazy Cat Lady" sign on tree pointed
18 towards MacyLand to intimidate Plaintiff & Family. Mark Eason & Linda
19 Koupeny are also preventing Plaintiff & Family from developing Plaintiff's
20 property, & have told the neighbors so. Linda Koupeny yells at Plaintiff &
21 Family ["Go away"] every single time Plaintiff & Family is at MacyLand
22 property cleaning up trash. Also preventing Plaintiff & Family from
23 cleaning near MacyLand property line. In front of Plaintiff's grandkids,
24 including Jedidiah Macy 11-years-old. Calling Jeff Macy, "an a--hole,
25 false prophet, fake, & a liar." Plaintiff & Family has never said anything
26 mean to Mark Eason or Linda Koupeny ever. Mark Eason & Linda
27 Koupeny are suspected of felony theft of Macy Family fences &
28 destruction of private property. Police Report Case **#052001280** Cut
down Plaintiff's cables & removed no trespassing signs.

19. I am informed and believe that on Christmas Eve at around **8:15 PM**
Defendant's County Sheriff Maestas showed up at Plaintiff & Family's
residence to give Jeff Macy a citizen's arrest ticket for trashed, broken
up, faded ½ of sign, picked up, & cleaned off of Macy Family property
weeks before. County Sheriff Maestas' Illegal Detainment of Jeff Macy
for broken up, trashed, faded ½ of sign, ticket. Jeff Macy appealed false
ticket & won on appeal. Another history of Police Misconduct,
Negligence, & False Ticket.

20. I am informed and believe that at nighttime, pitch black, Plaintiff &
Family was on MacyLand; suspicious unknown drones with flickering,

1 flashing lights flew over Plaintiff's private property & followed Plaintiff &
2 Family around. Suspicious unknown drones were spying on Plaintiff &
3 Family for a very long time; hovering over Plaintiff & Family. Defendant's
4 County Sheriffs never investigated or came out for suspicious unknown
5 drones or who sent/controlled suspicious unknown drones. When Plaintiff
6 & Family drove away, Plaintiff & Family was followed home from
7 Cedarpines Park to Twin Peaks, CA by 1 black vehicle for over 40
8 minutes. Every time Plaintiff & Family pulled over, black vehicle stalking
9 Plaintiff & Family would also pull over. Plaintiff & Family had to pull over
10 multiple times, in hopes that black vehicle would stop following Plaintiff &
11 Family.

9 21. I am informed and believe that Defendant's County Sheriff Officer
10 Maestas has not investigated on many occasions when called or "if"
11 shows up to MacyLand. Plaintiff & Family are being targeted for being a
12 non-profit Religious Facility & Religious Organization. 1611 Bible Translator
13 & Scribes Macy Family. County Sheriff Maestas showed up for felony theft
14 allegations of Macy Family Property numerous times. Plaintiff & Family has
15 lost many chains, cables, glass lights, signs, & cameras. County is trying to
16 take Plaintiff's Property for free. County Sheriffs are helping to cover up
17 for County. Plaintiff & Family has called at least 6x, without Defendant's
18 County Sheriffs showing up. County Sheriffs have stopped coming out to
19 MacyLand to help Macy Family, because County Sheriffs are covering
20 up for County CSA-18.

17 22. I am informed and believe that:

18 https://www.youtube.com/watch?v=YXI7Py_X4pg At 3:11, video on
19 3/8/2024 at 11:21 AM; County Sheriff Maestas lied, said, "I have never
20 arrested you (Jeff Macy)." At 4:00 of video, County Sheriff Maestas
21 refused to answer: if County Sheriff Maestas was going to follow up.
22 County Sheriff Maestas only said, "I have the documents." Later that
23 day, Defendant's County Watch Commander Sergeant Popa said, "I do
24 not know I have to have my ID on my Uniform." County Watch
25 Commander Sergeant Popa said on phone, "Not going to investigate."
26 County Watch Commander Sergeant Popa did not know had to be
27 courteous, only thought professional.

25 23. I am informed and believe that Defendant's code of ethics:

26 <https://wp.sbCounty.gov/sheriff/about-us/> As a law enforcement officer,
27 my fundamental duty is to serve mankind; to safeguard lives & property;
28 to protect the innocent against deception, the weak against oppression
or intimidation, & the peaceful against violence or disorder; & to respect

1 the constitutional rights of all men to liberty, equality, & justice. I will keep
2 my private life unsullied as an example to all; maintain courageous calm
3 in the face of danger, scorn, or ridicule; develop self-restraint; & be
4 constantly mindful of the welfare of others. Honest in thought & deed in
5 both my personal & official life, I will be exemplary in obeying the laws of
6 the land & the regulations of my department. Whatever I see or hear of
7 a confidential nature or that is confided to me in my official capacity,
8 will be kept ever secret unless revelation is necessary in the performance
9 of my duty. I will never act officiously or permit personal feelings,
10 prejudices, animosities, or friendships to influence my decisions. With no
11 compromise for crime & with relentless prosecution of criminals, I will
12 enforce the law courteously & appropriately without fear or favor,
13 malice or ill will, never employing unnecessary force or violence & never
14 accepting gratuities. I recognize the badge of my office as a symbol of
15 public faith, & I accepted it as a public trust to be held as long as I am
16 true to the ethics of the police service. I will constantly strive to achieve
17 these objectives & ideals, dedicating myself before GOD to my chosen
18 profession...law enforcement. B. All requests will be handled in a timely
19 manner: The PRA requires public agencies to initially respond to a
20 request for records within ten calendar days (this time limit may be
21 extended by 14 days in certain circumstances). CSD will inform the
22 requestor of the status of the request within ten days, & further inform the
23 requestor of an estimated timeframe for completion. Section 6253 of the
24 Government Code, which sets forth the 10-day compliance period
25 under the Public Records Act, simply states that a response shall be
26 made "within 10 days from receipt of the request."
27

19
20 **FIRST CAUSE OF ACTION**

21 **Police Misconduct**

22 **(By Plaintiffs Against Defendant San Bernardino County Sheriff's Department**
23 **Twin Peaks Patrol Station)**

24 24. Plaintiffs hereby re-alleges and incorporates by this reference, as though
25 set forth in full, the allegations in paragraph 1 through 23, inclusive.

26 25. Defendant's County Sheriff Officers are not showing up to investigate, or
27 do their job! Defendants are refusing to go to MacyLand to help

1 Plaintiff's religious development; for Sheriffs already know that another
2 County department: CSA-18 is committing said crimes against Plaintiff.
3 County Sheriff Officers are not investigating County CSA-18 as part of
4 continued cover up. Defendant's Officers are not calling Plaintiff back in
5 regards to what's happening on Plaintiff's MacyLand property.

6 Defendant's Officer told Plaintiff, "We (Sheriff's) don't normally arrest
7 County employees". When Defendant San Bernardino County Sheriff's
8 Department Twin Peaks Patrol Station found out that San Bernardino
9 County CSA-18 Special Districts were the ones doing criminal activity on
10 Plaintiff's private religious property; County Sheriff Officer's stopped
11 coming out to help Plaintiff. Defendants stopped doing Sheriff's required
12 job for the Plaintiff for years. County CSA-18 has admitted to cutting &
13 stealing Plaintiff's: cables, bolts, signs, & shattered, broken multiple glass
14 lights. County caused dangerous, hazardous conditions to exist; on
15 Plaintiff's private road. Harassed Plaintiff & Family multiple times for years,
16 saying, "Criminal destruction of private religious property is a civil issue?"
17 At least 6x Defendant's County Sheriff Officer's never/refused to come to
18 Plaintiff's property to even investigate; when called for emergency
19 situations!
20

21 26. Defendant's County Sheriff Officers are helping San Bernardino County,
22 CA cover up numerous crimes from multiple County departments (such
23 as: County CSA-18, Sheriff's, County Code enforcement, County Fire
24 Hazard Abatement, County Public works, County Waste Management,
25 Cedarpines Park Mutual Water Company, Neighbors, County Records
26 Requests, County Department of Risk Management, & County Counsel).
27

1 27. Plaintiff's neighbor Mark Eason admitted to shooting rattlesnake with
2 Eason's shotgun on Plaintiff's property. Mark Eason also admitted to
3 placing rattlesnake 10' clearly onto Plaintiff's property; on top of a round
4 log, in plain sight. Eason intentionally placed rattlesnake on Plaintiff's log
5 to intimidate & scare Plaintiff's grandchildren. Case #052001280.
6 Defendant's County Sheriff Maestas should have arrested Mark Eason for
7 admitting to using shotgun on Plaintiff's Property to kill Rattlesnake &
8 throw on Plaintiff's log. Instead, continued history of failure of duty,
9 negligence, & Police Misconduct.

10
11 28. Defendant's County Sheriff Maestas trespassed onto Plaintiff's private
12 road, Defendant's Officer was supposed to meet at top entrance of
13 MacyLand property to investigate Macy Family's stolen no trespassing
14 signs/cut cables etc. County Sheriff Maestas said, "I noticed the cables
15 have been cut down again", but asked more questions about the
16 broken, trashed, faded 1/2 of sign that neighbor called in saying, Plaintiff's
17 son Jeff Macy took their sign.

18 29. Defendant's County Sheriff Maestas did more investigation about
19 allegation of petty theft broken, trash 1/2 of sign, instead of investigating
20 Plaintiff & Family's cables & signs. Macy Family was cleaning up
21 MacyLand property & faded 1/2 of 1 part of a trashed, broken in 1/2 faded
22 sign; lying face down on Plaintiff's property. Plaintiff's son Jeff Macy
23 picked up faded 1/2 of sign & threw faded 1/2 of sign in back of dump
24 truck with trash to throw away. Broken up, \$0 value plastic, trash 1/2 of sign
25 was in back of Macy Family trash truck to take to dump; for County
26 Code Enforcement ticket fine given to Plaintiff to clean up trash.
27 Defendant's Officer talked more about the trashed, faded 1/2 of sign Jeff
28

1 Macy picked up, rather than Macy Family's signs & cut down cables
2 which he was called out for from Macy's. County Sheriff Maestas never
3 turned \$0 value plastic, trashed, faded ½ of sign into evidence.

4 30. Defendant's County Sheriff Maestas gave sign to Hearsay neighbor
5 instead of taking the \$0 value, faded ½ plastic, trash sign into evidence.
6 [Required for a criminal charge] County Sheriff Maestas drove up road to
7 give neighbor \$0 value plastic, trashed, faded ½ of sign! Hearsay
8 neighbor called in, saying, "Not owner of vacant property lot, but has
9 authority to call on behalf of owner?". Hearsay neighbor had "No
10 Trespassing" sign on unknown vacant lot owner's property. County Sheriff
11 Maestas doesn't even know how to do job, doesn't even understand
12 chain of custody with evidence.

13 31. Neighbor admitted to knowing who's illegally dumping trash on Plaintiff's
14 property. County Sheriff Maestas failed to investigate admission of guilt
15 for a neighbor's vacant property. Neighbor should have been arrested
16 for admission of guilt, County Sheriff Maestas did not do follow up
17 investigation or call Plaintiff & Family back.

18 32. Defendant's County Sheriff Maestas cannot charge petty theft for
19 broken up, \$0 value plastic, trashed, faded ½ sign.

20 33. Defendant's County Sheriff Maestas drove down dirt road fast, reckless
21 driving, yelling at Plaintiff's son Jeff Macy in front of family for picking up
22 trash because of County notice.

23 34. Hearsay Neighbor did a False Police report against Plaintiff & Family.
24 Hearsay neighbor does not even own property that supposed 0 value
25 plastic sign was located on. Plaintiff & Family never met accuser. The
26
27

1 original reason Defendant's County Sheriff Maestas was called out, was
2 for Macy Family's signs & cut down cables.

3
4 35. There was an abandoned vehicle trespassed & parked onto Plaintiff's
5 private property; in front of clearly identified "No Trespassing" signs.
6 Blocking Plaintiff's parking entrance. Plaintiff & Family called 911, but
7 Defendant's County Sheriffs never showed up. Plaintiff & Family waited in
8 the cold for over 1 hour, then drove home after realizing County Sheriffs
9 were not going to come.

10 36. I am informed and believe that on Christmas Eve at around 8:15 PM
11 Defendant's County Sheriff Maestas showed up at Plaintiff & Family's
12 residence to give Jeff Macy a citizen's arrest ticket for trashed, broken
13 up, faded 1/2 of sign, picked up, & cleaned off of Macy Family property
14 weeks before. County Sheriff Maestas' Illegal Detainment of Jeff Macy
15 for broken up, trashed, faded 1/2 of sign, ticket. Jeff Macy appealed false
16 ticket & won on appeal. Another history of Police Misconduct,
17 Negligence, & False Ticket.

18 **SECOND CAUSE OF ACTION**

19 **Emotional Distress**

20 **(By Plaintiffs Against Defendant San Bernardino County Sheriff's Department**
21 **Twin Peaks Patrol Station)**

22 37. Plaintiffs hereby re-alleges and incorporates by this reference, as though
23 set forth in full, the allegations in paragraph 1 through 36, inclusive.

24 38. Defendants "**abused a position of authority**" Plaintiff & Family cannot
25 trust Sheriff's to do their job. Instead of helping Plaintiff & Family,
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1 Defendant turned against Plaintiff & Family and gave Plaintiff's son Jeff
2 Macy ticket for trash. The ticket was appealed and won on appeal.

3 39. Defendants had already known Plaintiff was "**particularly vulnerable to**
4 **emotional distress**". Plaintiff Lynn Macy has Dementia and is elderly.
5 California Penal Code § 368 PC defines elder abuse as the physical or
6 emotional abuse, neglect, or financial exploitation of a victim 65 years of
7 age or older. Defendants have neglected to help Plaintiff & Family.

8 40. Defendants, "**knew that their conduct will likely result in emotional**
9 **harm**". Defendant actions described in this Complaint were intentional,
10 extreme, and outrageous. County Defendant is actively covering up for
11 other County Organizations and not helping protect Plaintiff & Family
12 against said crimes.

13 41. Plaintiff is further informed and believes and here-in alleges that such
14 actions were done with intent to cause serious emotional distress and
15 were done with reckless disregard of the probability of causing Plaintiffs
16 serious emotional distress.

17 42. The conduct of the Defendants was despicable, abuse of power, abuse
18 of authority, oppressive, and accomplished with a conscious disregard
19 for Plaintiff & Family's rights.

20 43. As a proximate result of the Defendant's actions and inactions; Plaintiff
21 Lynn Macy incurred damages in the form of psychological and
22 emotional injuries, including, without limitation, pain and suffering, sleep
23 deprivation, humiliation, all of which are continuing and damaging to
24 reputation. Plaintiff's actual damages will be ascertained at trial.

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26 **THIRD CAUSE OF ACTION**

27 **Cover Up**

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**(By Plaintiffs Against Defendant San Bernardino County Sheriff's
Department Twin Peaks Patrol Station)**

44. Plaintiffs hereby re-alleges and incorporates by this reference, as though set forth in full, the allegations in paragraph 1 through 43, inclusive.

45. Defendant's County Sheriffs are not showing up, not doing their job, "Police Misconduct" to Macy Land to help Plaintiff & Family because Defendant already knows it's County CSA-18 committing crimes. County Sheriffs are not investigating County CSA-18 as part of continued cover up.

46. Defendant's County Sheriffs are not calling back in regards to what's happening on Plaintiff's property. "We (County Sheriff's) don't normally arrest County employees." When the Defendant Sheriff's Department found out that San Bernardino County CSA-18 Special Districts were the ones doing criminal activity on Plaintiff's private property; County Sheriffs stopped helping the Plaintiff & Family.

47. County CSA-18 has admitted to cutting & taking Plaintiff's cables down, signs, causing broken multiple glass lights; causing a dangerous, hazardous condition on Plaintiff's road, & harassed the Plaintiff & Family multiple times. "Police against Community mentality."

48. Instead of the Defendant's correcting County CSA-18's wrongdoings, Defendants are helping San Bernardino County cover up numerous crimes.

49. Plaintiff's son Jeff Macy called Defendant County Sheriff's on 3/7/2024 about Cedarpines Park Mutual Water Company for trespassing on Plaintiff's property. Plaintiff & Family have survey & authority to show

1 where survey markers are located, but the Defendant County Sheriff's
2 never called back or showed up to help.

3 50. For the good of the community, anyone that is involved in this cover up
4 and widespread corruption should be retrained, suspended or fired.

5 51. Defendant's authorities to the best of Plaintiff's knowledge has failed to
6 do any and all investigations or resolutions to this day!

7 52. Defendant's County Sheriff Officer Maestas has not investigated on
8 many occasions when called or "if" shows up to MacyLand. Plaintiff &
9 Family are being targeted for being a non-profit Religious Facility &
10 Religious Organization. 1611 Bible Translator & Scribes Macy Family.
11 County Sheriff Maestas showed up for felony theft allegations of Macy
12 Family Property numerous times. Plaintiff & Family has lost many chains,
13 cables, glass lights, signs, & cameras. County is trying to take Plaintiff's
14 Property for free. County Sheriffs are helping to cover up for County.
15 Plaintiff & Family has called at least 6x, without Defendant's County
16 Sheriffs showing up. County Sheriffs have stopped coming out to
17 MacyLand to help Macy Family, because County Sheriffs are covering
18 up for County CSA-18.
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20 **FOURTH CAUSE OF ACTION**

21 **Failure to do Public Record's Requests**

22 **(By Plaintiffs Against Defendant San Bernardino County Sheriff's**

23 **Department Twin Peaks Patrol Station)**

24 53. Plaintiffs hereby re-alleges and incorporates by this reference, as though
25 set forth in full, the allegations in paragraph 1 through 52, inclusive.
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1 54. There are numerous incident reports & County Sheriff reports. Defendant
2 County Sheriff's Department is still failing to give Plaintiff's public records
3 requests.

4 55. Defendants violated Government Code (GC) sections 6250-6270 failure
5 to complete request within the 10 days to this day.

6 56. Defendants failed to do a public records request as requested by
7 Plaintiff multiple times.

8 57. Plaintiff has requested numerous times for documents as well as
9 recordings from Defendant. Defendant has failed to follow the 10-day
10 legal requirement to disclose and provide the documents to Plaintiff as
11 requested.

12 58. All Public Records Requests will be handled in a timely manner: The PRA
13 requires public agencies to initially respond to a request for records
14 within ten calendar days (this time limit may be extended by 14 days in
15 certain circumstances). CSD will inform the requestor of the status of the
16 request within ten days, & further inform the requestor of an estimated
17 timeframe for completion. Section 6253 of the Government Code, which
18 sets forth the 10-day compliance period under the Public Records Act,
19 simply states that a response shall be made "within 10 days from receipt
20 of the request." Defendants has not followed or responded to any Public
21 Records Requests made by Plaintiff & Family.

22 59. Defendant has failed to fulfill public records request from Plaintiff for
23 what regulations Defendant has and who made the regulations; for
24 Defendant to not follow the laws.
25

26 **FIFTH CAUSE OF ACTION**

Municipal and Supervisory Liability (42 U.S.C. § 1983)

**(By Plaintiffs Against Defendant San Bernardino County Sheriff's Department
Twin Peaks Patrol Station)**

60. Plaintiffs hereby re-alleges and incorporates by this reference, as though set forth in full, the allegations in paragraph 1 through 58, inclusive.

61. Defendant's maintaining grossly inadequate procedures for reporting, supervising, investigating, reviewing, controlling & disciplining the intentional conduct by County Sheriff Officers.

62. Defendant County Sheriff Officers together with various other officials whether named or unnamed, had either actual or constructive knowledge of the deficient policies, practices, and customs alleged in the paragraphs above. Despite having knowledge as stated above these Defendants condoned, tolerated, and through actions and inactions thereby ratified such policies. Said Defendants also acted with deliberate indifference to the foreseeable effects and consequences of these policies with no respect of the constitutional rights of Plaintiff & Family.

63. By reason of the aforementioned policies and practices of Defendants, Plaintiffs incurred damages in the form of thousands of dollars lost and emotional injuries, including, without limitation, humiliation, all of which are continuing and damage to reputation. Plaintiffs' actual damages will be ascertained at trial.

64. The policies, practices, and customs implemented and maintained & still tolerated by Defendant were affirmatively linked to and were significantly influential forces behind the Plaintiff receiving more tickets

1 from County Code Enforcement trying to wrongfully extort more money
2 from Plaintiff.

3 65. Defendant has allowed County Sheriff Officers to deprive Plaintiff Lynn
4 Macy of her rights and liberties secured to her by the 4th and 14th
5 Amendments to the United States Constitution, in that said Defendants
6 and their supervising and managerial employees, agents, and
7 representatives acting with gross negligence and with reckless and
8 deliberate indifference to the safety, rights, and liberties of the public in
9 general and of Plaintiff Lynn Macy, and of persons in their class, situation
10 and comparable position, in particular, knowingly maintained, enforced
11 and applied an official recognized custom, policy, and practice of:

12 (a) Employing and retaining as county officials and other
13 personnel, including County Sheriff Officers at all times material
14 herein knew or reasonably should have known had propensities
15 for abusing their authority and for mistreating citizens by failing
16 to follow their code of ethics;

17 (b) Inadequately supervising, training, controlling, assigning and
18 disciplining County Sheriff Officers and other personnel, each
19 knew or in the exercise of reasonable care should have known
20 the aforementioned propensities and character traits;

21 (c) Maintaining grossly inadequate procedures for reporting,
22 supervising, investigating, reviewing, controlling, and disciplining
23 the intentional conduct by County Sheriff Officers and other
24 personnel;

25 (d) Failing to adequately train County Sheriff Officers including
26 Defendant San Bernardino County Sheriff's Department Twin
27

1 Peaks Patrol Station and failing to institute appropriate policies
2 regarding constitutional procedures and practices.

3 66. Defendant had either actual or constructive knowledge of the deficient
4 policies, practices, and customs alleged in the paragraphs above.
5 Despite having knowledge as stated above, the Defendant condones,
6 tolerated and through actions and inactions thereby ratified such
7 policies. Said Defendant also acted with deliberate indifference to the
8 foreseeable effects and consequences of these policies with respect to
9 the constitutional rights of Plaintiff Lynn Macy and other individuals
10 similarly situated.
11

12 **SIXTH CAUSE OF ACTION**

13 **NEGLIGENCE**

14 **(By Plaintiffs Against Defendant San Bernardino County Sheriff's Department**
15 **Twin Peaks Patrol Station)**

16 67. Plaintiffs hereby re-alleges and incorporates by this reference, as though
17 set forth in full, the allegations in paragraph 1 through 65, inclusive.

18 68. Defendants were negligent in training County Sheriff Officers. Officers
19 know their name tags (identification) has to be clearly visible.

20 Defendant's County Sheriff Officers also did not provide a business card
21 or proof of identification.

22 69. Defendant's Captain also refuses to have meeting with Plaintiff & Family
23 about Theft, Trespassing, Harassment, and all above said violations
24 against Plaintiff & Family done by other County Officials.

25 70. Defendant was negligent. County Sheriff Officers know County Officers
26 need to identify themselves. County Sheriff Officer's failed to identify
27

1 themselves as per Macy's video evidence & testimonies. Doornbos v.
2 City of Chicago (2017)

3 71. Plaintiff's neighbor Mark Eason admitted to shooting rattlesnake with
4 Eason's shotgun on Plaintiff's property. Mark Eason also admitted to
5 placing rattlesnake 10' clearly onto Plaintiff's property; on top of a round
6 log, in plain sight. Mark Eason even admitted to Defendant's Officer
7 County Sheriff Maestas that Mark Eason shot rattlesnake outside in
8 public, but was not arrested or given a ticket. Case #052001280. County
9 Sheriff Maestas should have arrested Mark Eason for admitting to using
10 shotgun on Plaintiff's Property to kill Rattlesnake & throw on Plaintiff's log.
11 Instead, continued history of failure of duty, negligence, & Police
12 Misconduct. Pattern of County Sheriffs not doing their job. Plaintiff's son
13 Jeff Macy even asked County Sheriff Maestas to remove rattlesnake,
14 which County Sheriff Maestas would not do.
15

16 72. On Christmas Eve at around 8:15 PM Defendant's County Sheriff Maestas
17 showed up at Plaintiff & Family's residence to give Jeff Macy a citizen's
18 arrest ticket for trashed, broken up, faded ½ of sign, picked up, &
19 cleaned off of Macy Family property weeks before. County Sheriff
20 Maestas' Illegal Detainment of Jeff Macy for broken up, trashed, faded
21 ½ of sign, ticket. Jeff Macy appealed false ticket & won on appeal.
22 Another history of Police Misconduct, Negligence, & False Ticket.
23

24 **SEVENTH CAUSE OF ACTION**

25 **CONSPIRACY**

26 **(By Plaintiffs Against Defendant San Bernardino County Sheriff's Department**
27 **Twin Peaks Patrol Station)**

1 73. Plaintiffs hereby re-alleges and incorporates by this reference, as though
2 set forth in full, the allegations in paragraph 1 through 71, inclusive.

3 74. 1. County Code Enforcement, 2. California Highway Patrol, 3. Burrtec, 4.
4 Waste Management, 5. County Public Works, 6. County CSA-18 7. San
5 Bernardino County Sheriff's Department are allegedly conspiring,
6 targeting Plaintiff & Family's religious Yeshua Temple project with animus-
7 based discrimination against their freedom of religion. Governmental
8 agencies are targeting Plaintiff & Family; religious non-profit Christians,
9 conspiring with other government organizations to deprive Plaintiff &
10 Family of their civil rights and/or ability to build a Holy Temple. County
11 Code Enforcement has given egregious notices, & have trespassed on
12 Plaintiff's private property multiple times; with no warrants or court orders
13 on Plaintiff's Mojave River Rd, CedarPines Park, CA 36-acre private
14 property. County Public Works, County CSA-18 has cut down Plaintiff's
15 cables at religious private property. Burrtec private trash company drives
16 on Plaintiff's private Augusta Way road without permission. For years
17 Burrtec has caused weight damage to Plaintiff & Family's private road
18 from excessive weight from Burrtec trucks, which travel from **County**
19 **SWMD** which is the County of San Bernardino's **Solid Waste Management**
20 **Division**; that Waste Management has willingly allowed to extort more
21 money. Defendant's County Deputy Sheriff Officer Robert Maestas gave
22 Plaintiff's son Jeff Macy an illegal ticket for picking up trash. Plaintiff &
23 Family put trash in Macy family trash truck, from own Macy's private
24 property. On Christmas evening, for a claim made a week earlier by an
25 unknown neighbor said had verbal permission to report broken sign on
26 Plaintiff's property as stolen trash? Defendant's County Deputy Sheriff
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1 Officer Robert Maestas said, "I didn't want to give you a ticket, but
2 captain made me do it, ...don't want to arrest you; but you will have to
3 appear in court to contest it." Jeff Macy, with whole family & Plaintiff
4 present collecting trash testified to County Officer it was trash in a trash
5 pile on Plaintiff's private property, out of sight, no neighbors live in view of
6 where Plaintiff & Family were picking up trash on Plaintiff's property.
7 Macy's had to worry, still had threat of going to jail for picking up trash
8 that County Code Enforcement said Plaintiff had to clean within 30 days.
9 The ticket was dismissed by the District Attorney. This was illegal
10 detainment, & another example of conspiracy & harassment being
11 alleged. Defendant County Sheriff's Department illegally detained and
12 ticketed Jeff Macy without any witness or suspects identification
13 procedure. Right to confront witness of false allegation. These are all Law
14 Enforcement agencies; coordinated attacks against Macy's free Yeshua
15 Temple project.
16

17 75. Legally, a Conspiracy exists when 2 or more persons join together and
18 form an agreement to violate the Law, & then act on that agreement.
19

20 **WHEREFORE**, Plaintiffs pray judgment against Defendants as follows:

- 21 1. For compensatory damages of \$100,000. if settled before trial;
- 22 2. For punitive damages on those claims where it is available pursuant to
23 law in an amount sufficient to punish, deter and make an example of
24 the Defendants;
- 25 3. For interest on those claims where it is available under law;
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- 4. For an order awarding PLAINTIFFS their reasonable attorney's fees as to Plaintiffs civil rights claim pursuant to 42 U.S.C. § 1988, including litigation costs and expenses;
- 5. For cost of suit; and
- 6. For such other and further relief as this Court may deem to be just and proper.

DEMAND FOR JURY TRIAL

Plaintiffs hereby demands a trial by jury.

Respectfully Submitted,

By Plaintiff: Lynn Macy

Lynn Macy