

COMP

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**THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VEM MILLER, an individual,
Plaintiff,

vs.

COUNTY OF RIVERSIDE, a public entity;
RIVERSIDE COUNTY SHERIFF'S
DEPARTMENT; SHERIFF CHAD BIANCO, in
his individual and official capacities; DEPUTY
CORONADO ID #5731; and DOES 1 through 10,
individually, jointly and severally
Defendants.

CASE NO.:

COMPLAINT FOR DAMAGES

1. 42 USC §1983
2. Failure to Train
3. Municipal Liability Ratification
4. Supervisor Liability
5. Deprivation of Rights
6. Intentional Infliction of Emotional Distress
7. Defamation
8. Invasion of Privacy- False Light

[DEMAND FOR JURY TRIAL]

COMPLAINT

COMES NOW, Plaintiff, VEM MILLER, who brings this action by and through the undersigned attorney of record SIGAL CHATTAH, ESQ. of CHATTAH LAW GROUP, and hereby complains and alleges against Defendants as follows:

INTRODUCTION

1
2 This civil rights action under 42 USC §1983 seeks compensatory and punitive damages
3 from Defendants for violating various rights under the United States Constitution and state law in
4 connection with the unlawful seizure and distribution of private information obtained in violation
5 of Plaintiff's constitution rights.

6 This Complaint alleges that police officers employed by the County of Riverside violated
7 Miller's First and Fourth Amendment Constitutional rights to privacy and to be free from
8 unlawful searches and seizures.

9 The evidence will establish that the officers were trained to act in precisely the manner
10 they acted and, thus, were trained to do precisely the wrong thing. If the officers had been
11 properly trained in the fundamental principles of search and seizure and safekeeping private
12 information, this incident would not have happened. In short, the officers' actions were contrary
13 to proper police practices. Riverside police practices were diametrically opposed to proper police
14 procedures, out of synch with the rest of the police profession, malicious, and plainly
15 unconstitutional.
16

17 Riverside police engaged in deliberate and wrongful conduct and compromised police
18 protocol violating Miller's constitutional rights for the purpose of promoting and engaging in a
19 meritless and gratuitous sensational story.

JURISDICTION AND VENUE

20
21 1. This action arises under Title 42 of the United States Code ("U.S.C.," 42 U.S.C.
22 §1983 and §1988). Jurisdiction is conferred upon this Court by Title 28 U.S.C §1331.

23 2. Venue is proper in the District of Nevada pursuant to 28 U.S.C. §1391(b) because
24 Plaintiff is a resident of the County of Clark, Nevada, which is within this judicial district.
25

THE PARTIES

1
2 3. Plaintiff VEM MILLER, (hereinafter, “Miller”); Plaintiff, *inter alia*) is a resident
3 of Las Vegas, Nevada, who at all times relevant herein was a member of the press.

4 4. Defendant County of Riverside (“Riverside”) is a municipal governmental entity
5 duly incorporated under the laws of the State of California. Under its authority, Defendant
6 Riverside County operates the Riverside County Sheriff’s Department (hereinafter “RCSD” *inter*
7 *alia*), and is, and was at all relevant times mentioned herein, responsible for the actions and/or
8 inactions and the policies, procedures and practices/customs of the employees of RCSD.

9 5. Defendant CHAD BIANCO, (hereinafter “Bianco”) is and was, at all times
10 relevant herein, the Sherrif of Riverside County with RCSD. Bianco was personally involved in
11 the acts that deprived Miller of his particular rights and to be free from deliberate indifference,
12 causing his damages. Bianco at all relevant times hereto, was acting under color of state law, and
13 is sued in his individual capacity.¹²

14 6. Defendant Deputy Coronado, (hereinafter “Coronado”) is a police officer with
15 Riverside Sheriff’s Office at all times relevant, was employed by the RCSD. Coronado was
16 personally involved in the acts that deprived Miller of his particular rights and to be free from
17 deliberate indifference and caused his damages. Coronado at all relevant times hereto, was acting
18 under color of state law, and is sued in his individual capacity.

19 7. Plaintiff is, at the time of the filing of this Complaint, ignorant of the true names
20 and capacities of Defendants Does I-X, and, therefore sue these Defendants by such fictitious
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22
23 ¹ It is significant to note that Defendants RCSD and Bianco have been riddled with claims of inadequate medical
24 safety, a pattern and practice of negligence, and scrutiny for significant rise in inmate deaths demonstrating a severe
25 lack of oversight within the Department. It is believed that Sheriff Bianco is currently under investigation by
California Attorney General (California Department of Justice) Rob Bonta for egregious mishandling of the
Riverside Sheriff’s Department.

² Defendants’ Department has been identified by the National Police Scorecard as particularly likely to use deadly
force relative to the number of arrests made.

1 names. Plaintiff is informed and believes and thereon alleges that Defendants Does I-X were
2 employed by the RCSD at the time of the conduct alleged herein. Plaintiff alleges Defendants
3 Does I-X violated Miller's civil rights by their deliberate indifference to his privacy and
4 profession and/or encouraged, directed, enabled and/or ordered other Defendants to engage in
5 such conduct. Plaintiff will seek leave to amend his Complaint to state the names and capacities
6 of Defendants Does I-X, when they are identified and ascertained. Does I-X, at all relevant times
7 hereto, were acting under color of state law, and are sued in their individual capacity.

8 8. Plaintiff alleges that the conduct of each Defendant deprived Miller of his
9 constitutional right to privacy and to be free from unlawful searches and seizures.

10 9. Each of the Defendants caused, and is responsible for, the unlawful conduct
11 directed towards Miller. Each of the Defendants, by participating in the unlawful conduct, or
12 acting jointly and in concert with others who did, authorized, acquiesced, condoned, and
13 approved the unconstitutional conduct by failing to take action to prevent said unconstitutional
14 conduct which resulted in the financial ruin, humiliation and destruction of Miller's life and
15 livelihood.
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17 10. Wherever reference is made in this Complaint to any act by Defendants, it is
18 alleged that each Defendant was the agent of the others. Defendants were acting within the
19 course and scope of this agency, and all acts alleged committed by any one of them shall also be
20 deemed to mean the acts and failures to act of each Defendant individually, jointly or severally.
21

PRELIMINARY STATEMENT

22 11. This civil rights action seeks compensatory and punitive damages from
23 Defendants for violating various rights under the United States Constitution and state law in
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1 connection with the search and seizure of Plaintiff's assets, the violations of his right to privacy
2 and the willful destruction of his reputation and financial well-being.

3 12. This is an action brought under 42 U.S.C. §1983 and the laws of the State of
4 Nevada, to hold the RCSD, and the COUNTY OF RIVERSIDE, via its policymaker, Defendant
5 Bianco and others, and two of its officers accountable for their unreasonable, unlawful, malicious
6 violations of the Plaintiff's rights.

7 13. On October 12, 2024, Plaintiff Vem Miller was in Riverside County to attend a
8 rally for Presidential candidate Donald J. Trump at the Coachella Valley festival.

9 14. Miller, a Las Vegas, Nevada resident, was a lawful owner and in lawful
10 possession of two firearms in his vehicle; a 1) Glock 19 handgun; and 2) shotgun.³

11 15. At approximately 15:00 hrs., as Miller approached the 52nd Street parking lot to
12 enter the parking lot, approximately half a mile away from the venue of the rally, Miller
13 disclosed to the guarding Riverside County Police Officer that he had two firearms in his vehicle,
14 he intended to leave in the parked vehicle.

15 16. The Officer flagged Miller to pull his vehicle aside which Miller complied with
16 said order.

17 17. A second police officer at the scene instructed Miller to get out of his vehicle,
18 which he complied with.

19 18. Miller was immediately handcuffed and placed in a RCSD patrol unit vehicle.

20 19. Miller disclosed to the officer that he is prediabetic and has a medical condition.

21 20. Officer Coronado, requested permission to retrieve the firearms to verify their
22 serial numbers and Miller's lawful ownership of same.
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25 ³ It is significant to note that there is no state permit required to purchase, possess or carry a shotgun, rifle or handgun in Nevada. Nevada state law permits open carry.

1 21. Officer Coronado then proceeded to conduct an unlawful and unconstitutional
2 search of all compartments of the vehicle, retrieving Miller’s personal documentation and other
3 personal items.

4 22. After hours of sitting in the patrol unit, Miller requested to relieve himself, which
5 he was denied.

6 23. At approximately 19:00 hrs., Miller was transported to Thermal Police Station for
7 agents from Federal Bureau of Investigation and United States Secret Service to interrogate him.

8 24. After 25 minutes of meeting with Officer Coronado, neither agents from the
9 Federal Bureau of Investigation or United States Secret Service were interested in interviewing
10 Miller and departed from Thermal Police Station. Again, neither agents interviewed Miller.

11 25. Thereafter, Miller was transported to John Benoit Detention Center arriving at
12 same at approximately 20:30 hrs.

13 26. Miller was released after posting a \$5,000.00 bail at approximately 01:30 October
14 13, 2024 with the following state charges:

15
16 25850(A) MISD CARRYING/LOADED FIREARM 00005000 CITE PC
17 32310(A) MISD LARGE CAPACITY MAGAZINE 00005000 CITE PC

18 27. Miller has a January 2, 2025 return date for his first appearance at Indio Larson
19 Justice Center on said charges.

20 28. Immediately after Miller’s arrest, Defendant Bianco did not miss an opportunity
21 to fabricate allegations against Miller, going on numerous news outlets, claiming to have
22 thwarted a third assassination attempt against Presidential Candidate Donald J. Trump.
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1 29. Defendant Bianco, knew that Miller was not charged with any wrongdoing
2 concerning assassination attempts, and that United States Secret Service and FBI agents even
3 declined to interview him.

4 30. It became clear that Bianco, intentionally, maliciously and with a blatant
5 disregard for the truth, wanted to create a narrative so as to be viewed as a “heroic” Sheriff who
6 saved Presidential candidate Trump from a third assassination attempt.

7 31. On October 13, 2024, Defendant Bianco conducted press conferences making
8 preposterous allegations against Miller including the following:

- 9
- 10 • Miller had multiple fake passports and fake driver licenses with different names;
 - 11 • Miller was a member of a sovereign citizens group;
 - 12 • The interior of the vehicle was in disarray;
 - 13 • Miller showed up with an unlicensed, unregistered vehicle with fake plates;
 - 14 • Weapons and ammunition with all the monstrous red flags of intent to assassinate the
15 President;
 - 16 • Miller presented a fake VIP and press passes at the check point;⁴
 - 17 • Bianco prevented another assassination attempt on the President;

18 32. Even after being notified by both United States Secret Service and Federal Bureau
19 of Investigation that they did not believe Miller was a threat and declined to interview him,
20 Defendant Bianco, continued to make preposterous allegations against Miller, holding press
21 conferences perpetuating his delusional and false narrative.⁵
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23
24 ⁴ This is perhaps, the most egregious allegation, since Miller was actually provided expedited special entry passes by
the Trump 47 campaign directly.

25 ⁵ It is also significant to note that Defendant Bianco currently has allegations against him that his department
schemed to falsify required reports to California Department of Justice, misclassifying incarcerated who died as
being sentenced. In 2022 alone, 18 inmates died in the custody of the RCSD, kicking off investigations thereon.

1 33. In fact, Miller, a registered Republican in Nevada, is a member of the Clark
2 County Republican Party, Central Committee.

3 34. During the Nevada GOP 2024, Presidential Caucus, Miller served as a Trump
4 Caucus Captain.

5 35. Miller is informed and thereon believes and alleges that upon realization that none
6 of the allegations, Defendant Coronado made against him, neither United States Secret Service
7 or the Federal Bureau of Investigation had any concerns about the veracity of Miller's
8 statements.

9 36. Instead of apologizing to Miller for the false accusations made against him,
10 Defendant Bianco compounded Defendants; misconduct, perpetuated a boisterous and delusional
11 narrative that has caused irreparable harm to Miller's character and reputation.

12 37. Defendant Bianco's acts of holding repeated press conferences perpetuating a
13 false narrative against Miller continues to shock the conscience and exceed the bounds of
14 decency.

15 38. As delineated *infra*, Miller's acts were protected under the First Amendment
16 Right to Privacy, Free Speech and Right to Petition.
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20 **FIRST CLAIM FOR RELIEF**
21 **42 USC § 1983**
22 **Violation of First Amendment Right to Privacy, Speech and Petition**
(All Defendants)

23 39. Plaintiff repeats and realleges all prior paragraphs of this Complaint and
24 incorporates the same by reference herein.
25

1 40. A person has a privacy interest in avoiding the public disclosure of personal
2 matters. *See In re Crawford*, 194 F.3d 954, 948-49 (9th Cir. 1999).

3 41. Defendants without any legitimate purpose disclosed Miller’s identity, made
4 preposterous allegations against him, placing him in false light, despite the fact that Miller, had
5 not committed any crimes associated with the allegations made in nationwide news conferences.

6 42. The right to engage in anonymous political conduct is a cornerstone of liberty. *See*
7 *McIntyre v Ohio Elections Comm’n*, 514 U.S. 334, 314-342 (1995) (recognizing that anonymity
8 for fear of official retaliation implicates First Amendment concerns and protections).

9 43. The First Amendment protects against the disclosure of associational
10 memberships absent a compelling state interest. *NAACP v. Alabama*, 357 U.S 449 (1958);
11 *accord Int’l Bhd. Of Teamsters, Airline Div. v Allegiant Travel Co., No. 2:14-CV-000043-APG,*
12 *2014 WL 6069851, at *8 (D. Nev. Nov. 12, 2014)*

13 44. Accordingly, Defendants and each of them are liable to Plaintiff’s for
14 compensatory damages.

15 45. Plaintiff also seeks statutory attorney fees and costs under this claim.
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20 **SECOND CLAIM FOR RELIEF**
21 **42 U.S.C. §1983 –**
22 **Failure to Train**
23 **(As Against County of Riverside and RCSD)**

24 46. Plaintiff repeats and realleges all prior paragraphs of this Complaint and
25 incorporates the same by reference herein.

1 47. The Fourth Amendment to the United States Constitution protects “[t]he right of
2 the people to be secure in their persons, houses, papers, and effects, against unreasonable
3 searches and seizures.” *U.S. Const. amend. IV*; see also *Carpenter v. United States*, 138 S. Ct.
4 2206, 2214 (2018) (“[T]he Amendment seeks to secure ‘the privacies of life’ against ‘arbitrary
5 power.’” (quoting *Boyd v. United States*, 116 U.S. 616, 630 (1886))).

6 48. It is firmly established that searches or seizures “conducted outside the judicial
7 process, without prior approval by judge or magistrate, are per se unreasonable under the Fourth
8 Amendment—subject only to a few specifically established and well delineated exceptions.”
9 *United States v. Brown*, 996 F.3d 998, 1004 (9th Cir. 2021).

10 49. Defendants conducted an unlawful search of all compartments of Miller’s vehicle,
11 thereafter towing it and holding it in impound in Riverside County thereby depriving him of the
12 rights and liberties secured to him by the Fourth and Fourteenth Amendments.

13 50. RCSD officers routinely deal with search warrants, criminal laws, and probable
14 cause.

15 51. RCSD officers routinely deal with the requirements of search warrants and the
16 need for probable cause to have said warrants issued.

17 52. RCSD officers understand the ramifications of engaging in unlawful and
18 warrantless searches and seizures.

19 53. RCSD is and at all times has been on notice that they must provide proper training
20 to its officers obtaining search warrants and issuance of warrants.

21 54. RCSD is and at all times has been on notice that it must not publicly disclose
22 information of private citizens engaged in lawful conduct so as to embarrass and humiliate said
23 persons.
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1 55. RCSD is further aware of its need to supervise, train, and discipline its officers
2 concerning compliance with established police policies, practices and guidelines regarding
3 safekeeping of evidence seized during the course and scope of an investigation.

4 56. RCSD is and has been aware that its officers have engaged in numerous officer
5 violations involving unconstitutional searches and seizures and warrants issued without probable
6 cause, which could have been reasonably avoided had its officers employed nationally accepted
7 police tactics and techniques.

8 57. Yet despite this knowledge RCSD has done nothing to train its officers in such
9 nationally accepted police tactics and techniques, to discipline them for their failures, or to hold
10 them accountable for their gross violations.

11 58. RCSD's custom and practice of turning the other way when officers violate
12 individual rights, engaging in unlawful searches and seizures, and refusal to discipline involved
13 officers and/or employ additional training, ensures the likelihood of repeat situations and
14 continuous violations of the rights of citizens.
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16 59. RCSD's failure to provide proper training represents a policy for which Riverside
17 County is responsible and for which Riverside County is liable.

18 60. RCSD's inadequate training demonstrates deliberate indifference on the part of
19 RCSD towards Miller, and others similarly situated, with whom police officers will routinely
20 come into contact.

21 61. In the course and scope of the investigation and dissemination of fabricated
22 statements about Miller, Defendants Coronado, Bianco and others, either failed to follow their
23 training or they were improperly trained in how to achieve a complete investigation and ensuring
24 that Miller's rights as a citizen remain protected.
25

1 62. RCSD’s failure to train and supervise Defendants Bianco and Coronado caused
2 the humiliation and economic loss to Miller and was at all times the moving force in Miller’s
3 humiliation and economic suffering.

4 63. As a direct and proximate result of RCSD’s failures, Miller suffered, severe
5 emotional distress, mental anguish, humiliation and even economic loss as a result of his
6 interactions with Defendants.

7 64. The conduct alleged herein was done in reckless disregard of Miller’s
8 constitutionally protected rights; justifying an award of punitive damages as against the
9 individually named Defendants.

10 65. RCSD’s failure to train Defendants Bianco and Coronado and other DOE officers
11 resulted in the intentional, reckless, and callous disregard for the life of Miller and his
12 constitutional rights.

13 66. The actions of Defendants Bianco and Coronado were willful, wanton,
14 oppressive, malicious, and unconscionable to any person of normal sensibilities.

15 67. Accordingly, Defendants and each of them are liable to Plaintiff for compensatory
16 damages.

17 68. Plaintiff also seeks statutory attorney fees and costs under this claim.

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19 **THIRD CLAIM FOR RELIEF**
20 **42 U.S.C. §1983 –**
21 **Municipal Liability—Ratification**
22 **(As Against County of Riverside)**

23 69. Plaintiff repeats and realleges all prior paragraphs of this Complaint and
24 incorporates the same by reference herein.

25 70. A ratification theory may be established in two ways: 1) based on a “pattern” of
ratification that constitutes a practice or custom, or (2) based on a single act by an official with

1 policy making authority.

2 71. Upon information and belief RCSD ratifies all excessive actions of its police
3 officers.

4 72. Policymakers for County of Riverside, have vigorously defended the County's
5 police officers for engaging in astonishing manner of action and unlawfully seized information
6 of Miller and the unlawful malicious misrepresentations about him.

7 73. Upon information and belief, policy makers at the RCSD have a custom and
8 practice of failing and/or refusing to discipline officers involved in systematically and unlawfully
9 seizing evidence and engaging in unconstitutional acts.

10 74. Upon information and belief, policy makers at the RCSD have a custom and
11 practice of improperly and systematically justifying violations of search and seizure rights that
12 are in fact unjustifiable.

13 75. Upon information and belief, policy makers at the RCSD have failed to
14 thoroughly investigate many of its officer search and seizure violations and have a custom and
15 practice of failing to take remedial steps after such violations.

16 76. Upon information and belief, County of Riverside and RCSD have ratified,
17 condoned, approved, and encouraged the use of warrantless searches and seizures by its officers.
18

19 77. County of Riverside was deliberately indifferent to the rights of Miller to be free
20 from unlawful searches and seizures, and protected from malicious lies in violation of his right to
21 privacy.

22 78. The County of Riverside engaged in the deliberate indifference and misconduct of
23 its employees.
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1 87. Defendants intentionally, knowingly and with a wanton disregard for Miller’s
2 constitutional rights used the media to spin a false and malicious narrative and unlawfully
3 disclosed and disseminated said information for the purposes of humiliating him and destroying
4 his livelihood.

5 88. Defendants’ actions were unnecessary, unreasonable, unlawful, and unjustified.

6 As a direct and proximate result of the Defendants’ unreasonable and unlawful actions,
7 Plaintiff has suffered and continues to suffer substantial past and future damages, both
8 compensatory and general, including, but not limited to, loss of income, severe emotional
9 distress, mental anguish, embarrassment and humiliation.

10 89. Because Defendants’ actions, and possibly other employees, agents, and/or
11 representatives of the Riverside Police Department, were “motivated by evil motive or intent”
12 and/or “involve[d] a reckless or callous indifference to the federally protected rights of [the
13 Plaintiff],” an award of punitive damages is appropriate to the fullest extent permitted by law.
14

15 90. As a direct, proximate and foreseeable result, Plaintiff suffered damages in an
16 amount according to proof at the time of trial.

17 91. Accordingly, Defendants and each of them are liable to Plaintiff for compensatory
18 damages, punitive damages, and attorney’s fees and costs.

19 **FIFTH CLAIM FOR RELIEF**
20 **42 U.S.C. §1983 –**
21 **Failure to Intervene in Violation of the 4th Amendment of the United States**
22 **Constitution**
23 **(All Defendants)**

24 92. Plaintiff repeats and realleges all prior paragraphs of this Complaint and
25 incorporate the same by reference herein.

1 93. The Sheriff of the RCSD is the “policymaker” with respect to RCSD, as a law
2 enforcement agency. *See e.g., Revene v. Charles County Comm’rs*, 882 F. 2d 870, 874 (4th Cir.
3 1989).

4 94. Municipal liability can attach under *Monell v. Department of Social Services*, 436
5 U.S. 658 (1978), for even a single decision made by a final policymaker in certain circumstances,
6 regardless of whether or not the action is taken once or repeatedly. *See Pembaur v. City of Case*
7 *1:20-cv-00135-TSK 18 Cincinnati*, 475 U.S. 469, 481, 106 S. Ct. 1292, 89 L. Ed. 2d 452 (1986).
8 If an authorized policymaker approves a subordinate’s decision and the basis for it, such
9 ratification would be chargeable to the municipality under Monell. *See City of St. Louis v.*
10 *Praprotnik*, 485 U.S. 112, 127 (1988).

11 95. Defendant Bianco, as the chief of police and policymaker for the RCSD has a
12 custom, pattern, practice, and/or procedure of hiring police officers who he knows have
13 committed acts of constitutional violations and/or have a propensity to do so.

14 96. When these officers inevitably commit acts of violations while working for the
15 RCSD, Defendant Bianco would ratify their unconstitutional acts and assist in covering up the
16 officer’s bad actions by charging members of the community, who fall victim to these officers,
17 of crimes.

18 97. In the instances cited above, no person or law enforcement officer was in
19 imminent danger and no exigent circumstances existed to engage in such unconstitutional
20 conduct.

21 98. Defendant Bianco had a duty to intervene when Defendants Coronado and others
22 were violating Miller’s constitutional rights, which resulted in excessive search, unlawful seizure
23 and humiliation and unmasking of Miller.
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1 99. Defendant Bianco observed and/or had reason to know that violation of Miller's
2 rights against unlawful search and seizure were being inflicted without a legitimate goal or
3 justification.

4 100. Defendant Bianco had the opportunity and means to prevent the unlawful search
5 and seizure and subsequent disclosure of Miller's information and identity, and/or additional
6 violations of Miller's constitutionally protected rights from occurring.

7 101. Not only was Defendant Bianco deliberately indifferent to Defendant Coronado
8 and others' unconstitutional searches and seizures, and subsequent actions, he encouraged and
9 ratified it.

10 102. "The concept of bystander liability is premised on a law officer's duty to uphold
11 the law and protect the public from illegal acts, regardless of who commits them. An officer may
12 be liable under § 1983, on a theory of bystander liability, if he: (1) knows that a fellow officer is
13 violating an individual's constitutional rights; (2) has a reasonable opportunity to prevent the
14 harm; and (3) chooses not to act.

15 103. As a direct and proximate result of the Defendants' unreasonable and unlawful
16 actions, Plaintiff has suffered and continues to suffer substantial past and future damages, both
17 compensatory and general, including, but not limited to, loss of income, severe emotional
18 distress, mental anguish, embarrassment, humiliation.

19 104. Because the Defendants' actions, and possibly other employees, agents, and/or
20 representatives of the RCSD, were "motivated by evil motive or intent" and/or "involve[d] a
21 reckless or callous indifference to the federally protected rights of [the Plaintiff]," an award of
22 punitive damages is appropriate to the fullest extent permitted by law.
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1 111. As a direct and proximate result of RCSD's failures, Miller suffered, severe
2 emotional distress, mental anguish, humiliation and even economic loss as a result of his
3 interactions with Defendants.

4 112. The conduct alleged herein was done in reckless disregard of Miller's
5 constitutionally protected rights; justifying an award of punitive damages as against the
6 individually named Defendants.

7 113. RCSD's failure to train Defendants resulted in the intentional, reckless, and
8 callous disregard for the life of Miller and his constitutional rights.

9 114. The actions of Defendants were willful, wanton, oppressive, malicious, and
10 unconscionable to any person of normal sensibilities.

11 115. Accordingly, Defendants and each of them are liable to Plaintiff for compensatory
12 damages.

13 116. Plaintiff also seeks statutory attorney fees and costs under this claim.

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15 **SEVENTH CLAIM FOR RELIEF**
16 **42 U.S.C. §1983 –**
17 **Vicarious Liability**
18 **(Against the County of Riverside)**

19 117. Plaintiff repeats and realleges all prior claims for relief of this Complaint and
20 incorporates the same by reference herein.

21 118. The negligence, carelessness, and wrongful acts of its employees, Defendants, and
22 other Doe parties, are imputed to the State of Nevada. The County of Riverside is vicariously
23 liable for the negligence, carelessness, and wrongful acts of its employees.

24 119. The injuries to Miller were caused by the negligence, carelessness, and wrongful
25 acts of DOE Defendants.

1 135. That all of Defendant's acts regarding the dissemination of the disclosed facts
2 were done with malice and wanton and reckless disregard for the truth.

3 WHEREFORE, Plaintiff, Vem Miller, demands judgment against the Defendants for:

4 a) Compensatory damages for all past and future economic losses and expenses incurred
5 by the Plaintiff as a result of the Defendants' misconduct;

6 b) General damages for all past and future physical pain, mental suffering, and emotional
7 distress suffered by the Plaintiff;

8 c) Punitive damages to the fullest extent permitted by law;

9 d) Pre-judgment and post-judgment interest;

10 e) Declare that the Defendants' acts, taken in their official capacities, as alleged above,
11 violate the First and Fourth Amendment to the United States Constitution;

12 f) Declare that the Defendants' acts, taken in their individual capacities, as alleged above,
13 violate the First and Fourth Amendment to the United States Constitution;

14 g) Immediately terminate Defendant Coronado employment relationship with
15 the RCSD, without severance;

16 h) Enjoin Defendants from engaging in hiring practices that result in the hiring of police
17 officers without proper vetting or review

18 i) Order the Defendants to adopt and implement policies, training, accountability systems,
19 and practices to remedy the constitutional and statutory violations described herein;

20 j) Costs incurred in this action and reasonable attorney fees under 42 U.S.C. §1988; and

21 k) Such other further specific and general relief as may become apparent from discovery
22 as this matter matures for trial.
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PLAINTIFF DEMANDS A TRIAL BY JURY.

Dated this 15th day of October, 2024.

CHATTAH LAW GROUP

/s/ Sigal Chattah

SIGAL CHATTAH, ESQ.

Nevada Bar No.: 8264

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Attorney for Plaintiff

Vem Miller

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