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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

RICHARD CASTILLO, an Individual,

Plaintiff,

v.

**CITY OF LOS ANGELES, a Municipal
Entity, and DOES 1 through 100,
inclusive,**

Defendants.

CASE NO.:

COMPLAINT FOR DAMAGES

GROUND FOR RELIEF:

- 1. Excessive Force (42 U.S.C. § 1983)
- 2. Municipal and Supervisorial Liability (42 U.S.C. § 1983)

DEMAND FOR JURY TRIAL

COMPLAINT FOR DAMAGES

COMES NOW Plaintiff, RICHARD CASTILLO, an individual, alleging this
Complaint for Damages, against Defendant, CITY OF LOS ANGELES, and Defendant
Officers, DOES 1 through 100, as follows:

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JURISDICTION AND VENUE

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1. The Court has original jurisdiction, pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3) through (4), as Plaintiff, RICHARD CASTILLO, asserts claims arising under the laws of the United States, including 42 U.S.C. § 1983, along with the Fourth and Fourteenth Amendments to the Constitution of the United States.

2. This Court has supplemental jurisdiction over Plaintiff’s claims arising under the laws of the State of California, pursuant to 28 U.S.C. § 1367(a), as those claims are so related to the federal claims that they form part of the same case or controversy under Article III of the Constitution of the United States.

3. Venue is proper in this Court, pursuant to 28 U.S.C. § 1391(b), because Defendants, CITY OF LOS ANGELES, and DOES 1 through 100, all reside in this District, while any and all incidents, events, and occurrences, giving rise to the Causes of Action, contained herein this Complaint for Damages, had occurred within this District.

COMPLIANCE WITH CLAIM FILING REQUIREMENTS

4. This Action is being filed, pursuant to 42 U.S.C. § 1983, alleging federal causes of action.

5. A government claim will be timely filed regarding the incidents, events, and occurrences, giving rise to any and all state causes of action.

6. Thereafter, within the applicable statutory period, Plaintiff, RICHARD

1 CASTILLO, will seek leave to file an Amended Complaint to join applicable state
2 causes of action.

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4 **PARTIES AND RELEVANT ACTORS**

5 7. Plaintiff, RICHARD CASTILLO, is an individual residing in the City of Los
6 Angeles, California.

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8 8. At all relevant times, Defendant, CITY OF LOS ANGELES, was a municipal
9 corporation, which exists under the Laws of the State of California, and was the
10 employer Defendant Officers, DOES 1 through 100.

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12 9. At all relevant times, Defendant Officers, DOES 1 through 100, were police
13 officers, law enforcement officers, agents, and employees of Defendant, CITY OF LOS
14 ANGELES, acting within the course and scope of such agency and employment, under
15 “color of state law.” Said Defendants are statutorily liable under California law
16 pursuant to California Government Code section 820.
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19 10. On information and belief, at all relevant times, Defendant Officers, DOES 1
20 through 100, were residents of the County of Los Angeles, California and are sued in
21 their individual capacities, as defined in the present Complaint for Damages.
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23 11. At all relevant times, Defendant Officers, DOES 1 through 100, were duly
24 appointed officers, employees, or agents of Defendant, CITY OF LOS ANGELES,
25 subject to oversight and supervision by the CITY OF LOS ANGELES’s elected and
26 non-elected officials.
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12. At this time, the true names and capacities of Defendant Officers, DOES 1 through 100, inclusive, are unknown to Plaintiff, who otherwise sues these Defendant Officers, DOES 1 through 100, by such fictitious names.

13. Plaintiff will seek leave to amend this Complaint to show the true names and capacities of these Defendant Officers, DOES 1 through 100, when they have been ascertained.

FACTS COMMON TO ALL COUNTS

14. Plaintiff, RICHARD CASTILLO, repeats and re-alleges each and every allegation, in Paragraphs 1 through 13 of this Complaint for Damages, with the same force and effect as if fully set forth and stated herein.

Background

15. Plaintiff, RICHARD CASTILLO, is a gentleman who resides in a tent, with his dog, “Mamas,” on an empty lot that is located in the Boyle Heights Neighborhood, on the 2400 block of Houston Street, in the City of Los Angeles, California.

16. Plaintiff has lived most of his life on the 2400 block of Houston Street and was raised two (2) houses down from the vacant lot. In fact, Plaintiff’s cousin still resides at this residence, with other family members living in the surrounding neighborhood.

1 17. For several years, the owner of the vacant lot was aware of Plaintiff's
2 presence on the property. However, to Plaintiff's knowledge, he has never been
3 instructed by the owner to leave the premises.
4

5 18. Similarly, for several years, members of the adjacent Church, the "Church of
6 God of the Prophecy," which sometimes uses the lot for parking, was also aware that
7 Plaintiff's presence. However, to Plaintiff's knowledge, he also has never been
8 instructed by the Church to leave the premises of the lot.
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10 19. As a member of the Boyle Heights community, Plaintiff and his dog,
11 "Mamas," are well-known by the neighborhood, who has accepted Plaintiff as one of
12 their own.
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15 **The Incident**

16 20. On or about April 27, 2020, when Plaintiff was sitting in the vacant lot, he
17 noticed two (2) "DOE" Officers approaching from the other end, where they seemingly
18 managed to "slip" through and/or over the back, chain-linked fence.
19

20 21. In noticing the DOE Officers approaching, Plaintiff became concerned.
21 Thus, he then began to leave the vacant lot, and started walking towards his cousin's
22 house, while DOE Officers followed him.
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24 22. As Plaintiff was exiting the vacant lot, DOE Officers shouted that he was
25 trespassing on private property. Plaintiff remained worried and continued walking
26 towards his cousin's house.
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1 23. As DOE Officers exited the vacant lot and entered the public sidewalk, on
2 Houston Street, they told Plaintiff to stop. Plaintiff complied with DOE Officers’
3 commands and waited for them to approach.
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5 24. By this time, Plaintiff was on the sidewalk, on Houston Street, between the
6 Church and his Cousin’s house, in front of a metal gate.
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8 25. Meanwhile, witnesses, observers, and residents in this Boyle Heights
9 neighborhood began to notice the incident unfold.
10

11 26. Some witnesses, observers, and/or residents even noticed that one of the
12 DOE Officers appeared to have removed an item from his body, which may have been
13 his body worn camera (BWC), and threw or dropped it on the ground, while he
14 approached Plaintiff
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16 27. This DOE Officer then aggressively grabbed Plaintiff and shoved him
17 against the metal gate which caused significant pain to Plaintiff’s previously injured
18 shoulder.
19

20 28. Plaintiff was terrified and indicated to DOE Officers that he was not resisting
21 their advances and that they should just place him in “handcuffs” instead of
22 “manhandling” him.
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24 29. At some point, during this encounter, a resident from across the street began
25 video recording the incident which has since gone “viral” on social media and in the
26 local news.
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Excessive Force & Brutality

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30. Meanwhile, as Plaintiff was facing the metal gate, away from DOE Officers, with his arms and wrists down behind his back, the male DOE Officer began to violently strike Plaintiff in his face, head, and body, despite the fact that Plaintiff was compliant, cooperative, non-resisting, non-dangerous, unarmed, and non-threatening.

31. The DOE Officer used closed fists to repeatedly strike Plaintiff in the face, head, and body, for a period of approximately twenty (20) or more seconds, while the other DOE Officer failed to intervene.

32. Witnesses, observers, and residents of the community began shouting for DOE Officers to stop striking Plaintiff, since he was not a threat to anyone; that he was friendly; and that he was cooperating with Officers.

33. Meanwhile, during the assault, the DOE Officer who was violently striking Plaintiff, then intentionally and purposefully “spit” into Plaintiff’s face, as he continued his attack.

34. Witnesses, observers, and/or residents further indicated that the DOE Officer, who was feloniously assaulting Plaintiff, may have been shouting at the other DOE Officer to “taze” Plaintiff, which she fortunately declined to do.

35. Meanwhile, Plaintiff refused to resist the DOE Officers’ attacks; refused to fight back; refused defend himself; and refused to flee the scene.

1 36. Throughout the incident, Plaintiff was terrified for his life, and was
2 experiencing substantial pain and suffering.

3 37. As other DOE Officers arrived to the scene, Plaintiff was “handcuffed” and
4 placed in a police cruiser.

5 38. Meanwhile witnesses, observers, and residents were indicating their
6 disapproval and criticism to the male DOE Officer, who appears to have responded by
7 telling them to “shut the fuck up... get inside... you are all idiots.”
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9 39. Witnesses, observers, and/or residents were then interviewed by the
10 responding DOE Officers who were shown the video recordings of the incident,
11 however, none of them intervened to stop the arrest of Plaintiff.
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15 **Plaintiff Was Jailed**

16 40. Meanwhile, DOE Officers proceeded to transport Plaintiff to the jail, at the
17 Hollenbeck Police Station, for booking and processing.

18 41. Upon being booked, Plaintiff was kept overnight in a jail cell, at the
19 Hollenbeck Police Station, until the next day.
20

21 42. DOE Officers attempted to have Plaintiff transported to another jail facility,
22 with the intention of having him criminally charged and prosecuted.
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24 43. Fortunately, some of the Officers decided to release Plaintiff from the
25 Hollenbeck Police Station, without any pending charges or citations.
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Officer’s Prior Record

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44. It has also been reported that the DOE Officer, who was striking Plaintiff, has been involved in three (3) previous officer involved shootings, while on duty as a uniformed, armed officer, leading to at least one (1) death, and various lawsuits.

45. However, this DOE Officer was allowed to remain on the police force; was merely transferred to various police stations within the City; and has demonstrated that he not been adequately disciplined, suspended, retrained, terminated, investigated, “flagged,” or supervised, which has continually placed members of the general public in danger.

COUNT 1

Excessive Force in Violation of Plaintiff’s Rights under the Fourth Amendment to the Constitution of the United States and 42 U.S.C. § 1983

[Alleged by Plaintiff against Defendant Officers, DOES 1 through 100]

46. Plaintiff, RICHARD CASTILLO, repeats and re-alleges each and every allegation, in Paragraphs 1 through 45 of this Complaint for Damages, with the same force and effect as if fully set forth and stated herein.

47. DOE Officers were acting, “under color of state law,” as uniformed, on-duty, armed police officers, employed by Defendant, CITY OF LOS ANGELES, on the date and time that they investigated, encountered, detained, arrested, assaulted, injured, and violated Plaintiff, thereby depriving him of his Fourth Amendment Rights.

1 48. DOE Officers intentionally “seized” Plaintiff, when they initiated a “stop,”
2 detention, and/or arrest of his person, thereby preventing Plaintiff, or any reasonable
3 person under the same circumstances, from physically leaving, walking away, ignoring
4 the Officers’ presence, or believing that they were free to do any of the foregoing
5 actions.
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8 49. This seizure of Plaintiff was intentional since DOE Officers verbally and
9 physically commanded Plaintiff to “stop,” and immediately detained him to the extent
10 that any reasonable person, under the circumstances, would not have felt free to leave or
11 “walk away,” especially in light of the two (2) aggressive, uniformed, armed DOE
12 Officers who were present.
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15 50. DOE Officers proceeded to use physical force to violently grab Plaintiff and
16 shove him, “face-first,” into a metal gated fence, while using their authority as
17 uniformed, armed police officers to prevent his freedom of movement, while Plaintiff
18 stood with his arms down, around his back, waiting to be “handcuffed.”
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21 51. The seizure of Plaintiff’s person was unreasonable, under the Fourth
22 Amendment, since DOE Officers proceeded to use excessive force when they
23 repeatedly, feloniously, violently, and unreasonably struck a non-resistant, compliant,
24 non-threatening, non-dangerous, responsive, unarmed, and cooperative Plaintiff in the
25 face, head, and body, while also “spitting” into his face, as DOE Officers made their
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1 arrest, or were allegedly defending themselves and/or attempting to prevent Plaintiff
2 from fleeing.

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4 52. This amount of force used by DOE Officers, on Plaintiff, was not objectively
5 reasonable, under all of the circumstances known to DOE Officers, at the time of that
6 they applied force upon Plaintiff.

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8 53. The nature of Plaintiff's actions, conduct, and behavior, either alleged or
9 witnessed, by DOE Officers, did not demonstrate an immediate threat to the safety of
10 any person, including DOE Officers, nor did Plaintiff create a dangerous situation for
11 anyone in the surrounding area.

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13 54. At the time of their encounter, DOE Officers knew that Plaintiff had not
14 committed any crime of violence that involved the infliction or threatened infliction of
15 serious physical harm nor was he involved in any type of domestic disturbance. DOE
16 Officers merely indicated that they believed Plaintiff was trespassing on private
17 property.

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19 55. At the time of the encounter, DOE Officers also knew that they were not
20 warranted in using this amount and type of physical force on Plaintiff, in light of the
21 alternative forms of detention and restraint that could have been exercised, especially
22 when Plaintiff was non-resistant, cooperative, non-threatening, non-dangerous, and
23 unarmed.

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1 56. DOE Officers also did not provide any warning to Plaintiff, prior to applying
2 this level of physical force upon him, nor could DOE Officers have been reasonably
3 mistaken about any of the foregoing circumstances, facts, situations, events,
4 observations, or evidence set forth in the previous allegations of this Complaint for
5 Damages.
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8 57. Due to the degree of force applied on Plaintiff, the actions of DOE Officers,
9 in repeatedly, feloniously, violently, unreasonably, and affirmatively striking Plaintiff in
10 his face, head, and body, were the “cause-in-fact” of the injuries that Plaintiff sustained
11 to his civil and constitutional rights, under the Fourth Amendment. Furthermore, these
12 same actions were the foreseeable and proximate cause of the Plaintiff’s damages, at the
13 time that DOE Officers had decided to act with such force, violence, and aggression.
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16 58. As a result, Plaintiff experienced emotional and psychological distress, pain
17 and suffering, physical injuries, humiliation and embarrassment, fears for his health
18 and wellbeing, general and special damages, and economic and non-economic damages,
19 in an amount to be proven at trial.
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22 59. Plaintiff alleges that DOE Officers had acted with a willful, wanton,
23 malicious, and reckless disregard for his rights, safety, and wellbeing, thereby
24 warranting the imposition of exemplary and punitive damages. DOE Officers acted
25 with ill will, spite, and with the purpose of injuring Plaintiff, and acted with complete
26 indifference to his safety and rights, as an absolute misuse and abuse of their authority
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1 and power, thereby taking advantage of Plaintiff’s vulnerability, weakness, compliance,
2 and helplessness, while he stood facing a fence, away from DOE Officers, with his
3 hands down, behind his back, as DOE Officers repeatedly struck his face, head, and
4 body.
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6 60. Plaintiff further claims attorney fees and legal costs pursuant to 42 U.S.C. §
7 1988, under this claim of relief.
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9 **COUNT 2**

10 **Municipal and Supervisorial Liability in Violation of 42 U.S.C. § 1983**

11 **[Alleged by Plaintiff against Defendant, City of Los Angeles]**

12 61. Plaintiff, RICHARD CASTILLO, repeats and re-alleges each and every
13 allegation, in Paragraphs 1 through 60 of this Complaint for Damages, with the same
14 force and effect as if fully set forth and stated herein.
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17 62. Plaintiff alleges that the express policies and/or widespread and/or
18 longstanding customs and practices of Defendant, CITY OF LOS ANGELES, actually
19 and proximately caused Plaintiff’s damages, including but not limited to, the
20 deprivation of his Fourth Amendment Rights, when DOE Officers applied excessive
21 and objectively unreasonable force upon his person, for which Defendant, CITY OF
22 LOS ANGELES, is directly liable.
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26 63. As previously alleged, DOE Officers were uniformed, armed police officers,
27 who were acting under the “color of state law,” as employees of Defendant, CITY OF
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1 LOS ANGELES, who intentionally seized Plaintiff, by using physical force, when they
2 purposely grabbed his person and shoved him into a metal gate, whereby no reasonable
3 person in Plaintiff's position would have felt free to leave.
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5 64. DOE Officers then proceeded to repeatedly strike Plaintiff in the face, head,
6 and body, while purposely "spitting" in his face, despite Plaintiff remaining
7 cooperative, compliant, non-resistant, non-threatening, non-dangerous, and unarmed. It
8 was objectively unreasonable for DOE Officers to have applied this degree of force
9 upon Plaintiff, which actually and proximately caused injuries and violations to his
10 Fourth Amendment Rights.
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13 65. When DOE Officers applied excessive force against Plaintiff, they either
14 acted pursuant to an expressly adopted official policy or a widespread or longstanding
15 practice or custom of Defendant, CITY OF LOS ANGELES, or were the product of the
16 foregoing, which encouraged, supported, tolerated, condoned, protected, and promoted
17 officer misconduct, excessive use of force or brutality, objectively unreasonable
18 seizures, and violent and aggressive police tactics.
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22 66. Specifically, Defendant, CITY OF LOS ANGELES, maintains official
23 policies and/or widespread and/or longstanding practices or customs of:
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- 25 a) failing to create a "paper trail" of Officer misconduct by systemically
26 rejecting citizen complaints at the early stages of an internal affairs or
27 department investigation;
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- b) failing to adequately investigate incidents where Officers have been accused of misconduct and violating civil rights of persons within the community;
- c) assigning problem officers or employees who “work in gray” to reject the claims of officer misconduct during the initial stages of an internal affairs or department investigation;
- d) assigning officers who are the subject of internal affairs investigations to the Department of Internal Affairs while the investigation is pending;
- e) reassigning officers to administrative duties or allowing them take “time off” in order to avoid any suspensions or discipline on their records;
- f) maintaining vague, ambiguous, and biased records that do not properly, adequately, or accurately apprise others of the officers’ past misconduct;
- g) failing to internally investigate any cases that are pending litigation which usually relate to the most serious forms of officer misconduct;
- h) failing to internally investigate claims that have not been internally filed but were externally reported or known by the Department;
- i) hiding behind settlements, general releases, and “no fault admissions” related to lawsuits or government claims;
- j) transferring, relocating, and/or promoting Officers or allowing them to resign prior any internal investigation completing or taking place;

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- k) failing to adequately flag problem officers within the department;
- l) failing to adequately retrain problem officers within the department;
- m) failing to properly discipline, suspend, or terminate problem officers within the department.
- n) transferring, moving, and/or relocating its problem Officers to various departments, stations, divisions, and positions in order to essentially “bury,” ignore, dilute, hide, and spread these problem Officers, along with their incidents of misconduct, to other LAPD Branch Stations, and to evade internal, disciplinary, and other investigations.
- o) allowing its Officers to participate in “renegade,” “gang-like,” cliques, which facilitate, conspire, promote, organize, encourage, and commit acts of police brutality, aggressive police tactics, and officer misconduct.
- p) allowing acts of excessive force to be committed against suspects, inmates, or defendants, in order for an Officer to gain membership into one of these renegade gang-like cliques;
- q) allowing Officers to formalize their membership into these renegade cliques with a “tattoo” that signifies that this particular Officer has “earned his ink;”
- r) allowing Officers to encourage, intimidate, and compel others to “work in gray,” or maintain a “code of silence,” or “blue code,” regarding these

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unconstitutional abuses in order to protect members, recruit younger deputies, and earn promotions;

s) allowing these secret societies of tattooed deputies in the East Los Angeles area to continue operating despite the FBI investigating these renegade cliques.

67. These policies, customs, and practices further allows Defendant, CITY OF LOS ANGELES, to continue employing problem Officers within the CITY OF LOS ANGELES, or to move them to other Cities and Counties, without leaving a “paper trail” of Officer misconduct.

68. Defendant, CITY OF LOS ANGELES, along with its Police Chiefs and Police Department(s), which ratify, adopt, condone, comply, and follow these policies, customs, and practices, further maintain mutual, unspoken agreements and reciprocity with other municipalities to accept their problem Officers as well.

69. The DOE Officer who assaulted Plaintiff was involved in several previous incidents involving excessive force, including three (3) previous officer involved shootings, which resulted in at least one (1) death, and subsequent lawsuits. However, pursuant to the foregoing policies, customs, and practices, this DOE Officer was allowed to remain employed, untrained, unsupervised, undisciplined, and uninvestigated by Defendant, CITY OF LOS ANGELES, which caused the injuries that Plaintiff had sustained.

1 70. The FBI has investigated the LAPD, in recent years, regarding similar
2 incidents involving excessive force, whereby officers repeatedly struck suspects in the
3 face, head, and bodies, in the same manner as Plaintiff was assaulted. However, these
4 incidents continue occurring, due to Defendant, CITY OF LOS ANGELES, maintaining
5 these unconstitutional policies, customs, and practices that are causing Fourth and
6 Fourteenth Amendment violations.
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9 71. For instance, in 2020, the Los Angeles Police Department has already self-
10 reported seventeen (17) separate officer involved shootings and critical incidents,
11 despite the CITY OF LOS ANGELES's "stay at home" orders, due to the Covid-19
12 pandemic. In 2019 and 2018, the Los Angeles Police Department self-reported thirty-
13 six (36) and thirty-nine (39) officer involved shootings and critical incidents.
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16 72. As such, these expressly adopted official policies or widespread,
17 longstanding practices or customs constitute a standard operating procedure of
18 Defendant, CITY OF LOS ANGELES, which has resulted in repeated incidents of
19 officer involved shootings and excessive force, against members of the general public,
20 inmates, suspects, and defendants.
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23 73. Ultimately, these official policies and/or widespread, longstanding practices
24 or customs of Defendant, CITY OF LOS ANGELES, are so closely related to the
25 deprivation of Plaintiff's Fourth Amendment Rights, that they were the moving force
26 that caused his injuries. Plaintiff would not have sustained his injuries had Defendant,
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1 CITY OF LOS ANGELES, maintained constitutional practices and safeguards to
2 prevent the continuous acts of excessive force, by its officers, in violation of the Fourth
3 and Fourteenth Amendments.
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5 74. As a result, Plaintiff experienced emotional and psychological distress, pain
6 and suffering, physical injuries, humiliation and embarrassment, fears for this health,
7 wellbeing, and safety, general damages, and special damages in an amount to be proven
8 at trial.
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10 75. Plaintiff further claims attorney fees and legal costs pursuant to 42 U.S.C. §
11 1988, under this claim of relief.
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13 **PRAYER FOR RELIEF**
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15 WHEREFORE, Plaintiff, RICHARD CASTILLO, respectfully requests entry of
16 judgement, in his favor, against Defendants as follows:
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- 18 a) For general damages in an amount to be proven at trial;
19 b) For special damages in an amount to be proven at trial;
20 c) For punitive damages in an amount to be proven at trial;
21 d) For interests at the time of trial;
22 e) For an award of reasonable attorney fees as to Plaintiff's federal civil rights
23 claims pursuant to 42 U.S.C. § 1988.
24 f) For an award of litigation costs and expenses;
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g) For any other equitable and legal relief that the Court deems just, proper,
and appropriate.

Date: 05/11/20

THE OUCHI LAW FIRM, A.P.C.

By.: Wesley G. Ouchi /s/
WESLEY G. OUCHI

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DEMAND FOR JURY TRIAL

Plaintiff, RICHARD CASTILLO, hereby respectfully demands a trial by jury in this matter.

Date: 05/11/20

THE OUCHI LAW FIRM, A.P.C.

By.: Wesley G. Ouchi /s/
WESLEY G. OUCHI