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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

15 JANE DOE 7064, an individual; JANE DOE
16 7035, an individual; and JANE DOE 7063, an
individual,
17 Plaintiffs,
18 v.
19 LOS ANGELES UNIFIED SCHOOL
DISTRICT, a public entity; JEFFREY
20 SCOTT JONES, an individual; and DOES 3-
21 20,
Defendants.

Case No. 22NWCV01077

**FIRST AMENDED COMPLAINT FOR
DAMAGES for:**

- 1) Negligence
- 2) Negligent Supervision/Retention
- 3) Sexual Battery
- 4) Sexual Harassment

*[Filed Pursuant to Code of Civil Procedure
Section 340.1, as Amended by Assembly
Bill 218]*

[Jury Trial Demanded]

FILED
Superior Court of California
County of Los Angeles

11/08/2022

Sherri R. Carter, Executive Officer / Clerk of Court

By: E. Chanes Deputy

1 Plaintiffs Jane Doe 7064, Jane Doe 7035, and Jane Doe 7063 (collectively, “Plaintiffs”)
2 bring this action against Defendants Los Angeles Unified School District (“LAUSD”); Jeffrey Scott
3 Jones (“Jones”); and DOES 3–20 (together, “Defendants”), and based on information and belief
4 alleges as follows:

5 **INTRODUCTION**

6 1. Shortly before Jones, an LAUSD teacher, pulled out a hidden razor and slit his throat
7 in open court, a unanimous jury found him guilty of sexually assaulting the 12 year-old daughter of
8 his then live-in girlfriend. Jones was a dangerous predator, who for over 25 years groomed LAUSD
9 students for sex. Astonishingly, he even married three of them, and also had several inappropriate
10 relationships with other underage students and LAUSD staff. Jones developed a pattern of marrying
11 an underage student, taking her virginity, finding a new underage student, and marrying that
12 underage student as soon as he divorced the last one. In response, LAUSD stood by and watched.
13 LAUSD not only facilitated Jones’s conduct, but LAUSD ignored the clear “red flags” of sexual
14 misconduct and grooming that allowed the needless sexual assaults of numerous underage girls
15 throughout the Los Angeles and Orange County communities for over 25 years.

16 2. Since at least 1987, LAUSD knew of several instances of sexual misconduct with
17 minor students and Jones’s modus operandi to woo and wed his underage female students from Bell
18 High School. Despite several reports of Jones’s misconduct in 1987, 1997, 2001, and 2004,
19 LAUSD never (1) investigated Jones’s inappropriate conduct with minors; (2) limited Jones’s
20 interaction and involvement with underage students until a satisfactory investigation could be
21 completed; (3) complied with its duty to ensure the safety of his students; nor (4) failed to report
22 suspected child abuse to the appropriate authorities. Instead, LAUSD continued to employ Jones
23 for decades, moving him from school to school, allowing him access to child after child.

24 3. By allowing Jones’s misconduct to remain unchecked, LAUSD sanctioned,
25 promoted, and emboldened Jones’s authority, ratified his conduct, and allowed him to gain further
26 access to other minor students solely for the satisfaction of Jones’s own prurient sexual desires.
27 Plaintiffs were three of those students.

1 **PARTIES**

2 4. Plaintiff Jane Doe 7064 is an adult female residing in Orange County. At all times
3 relevant to this Complaint, Plaintiff was residing in Los Angeles County, California. Plaintiff was
4 born in 1979, and brings this Complaint pursuant to Code of Civil Procedure section 340.1, as
5 amended by Assembly Bill 218, for the child assault she suffered at the hands of
6 Defendants. Pursuant to California Government Code section 905(m) as amended by Assembly
7 Bill 218, Plaintiff is specifically exempt from the claims presentation requirement for her claims
8 against LAUSD.

9 5. Plaintiff Jane Doe 7035 is an adult female residing in Las Vegas, Nevada. At all
10 times relevant to this Complaint, Plaintiff was residing in Los Angeles County, California. Plaintiff
11 was born in 1970 and brings this Complaint pursuant to Code of Civil Procedure section 340.1, as
12 amended by Assembly Bill 218, for the child assault she suffered at the hands of
13 Defendants. Pursuant to California Government Code section 905(m) as amended by Assembly
14 Bill 218, Plaintiff is specifically exempt from the claims presentation requirement for her claims
15 against LAUSD.

16 6. Plaintiff Jane Doe 7063 is an adult female residing in Los Angeles County. At all
17 times relevant to this Complaint, Plaintiff was residing in Los Angeles County, California. Plaintiff
18 was born in 1982, and brings this Complaint pursuant to Code of Civil Procedure section 340.1, as
19 amended by Assembly Bill 218, for the child assault she suffered at the hands of Defendants.
20 Pursuant to California Government Code section 905(m) as amended by Assembly Bill 218,
21 Plaintiff is specifically exempt from the claims presentation requirement for her claims against
22 LAUSD.

23 7. LAUSD was, and is, a public entity having its principal place of business in Los
24 Angeles County, California. LAUSD purposely conducts substantial educational business activities
25 in the State of California and was the primary entity owning, operating, and controlling Bell High
26 School, and the activities, behavior, and conduct of its employee, servant, and/or agent Jones.

8. On information and belief, Jones is currently in the custody of the California Department of Corrections and is incarcerated in a state prison in Soledad, California. At all times mentioned herein, Jones was employed by LAUSD as an English teacher at Bell High School.

9. The true names and capacities, whether individual, corporate, partnership, associate, or otherwise, of Defendants DOES 3–20, inclusive, are unknown to Plaintiffs. Accordingly, Plaintiffs sue DOES 3–20 by such fictitious names pursuant to section 474 of the California Code of Civil Procedure. Plaintiffs will seek leave to amend this Complaint to allege their true names and capacities when they are ascertained. Plaintiffs are informed and believes and thereon alleges that DOES 3–20 are legally responsible in some manner for the events, happenings, and/or tortious and unlawful conduct that caused the injuries and damages alleged in this Complaint.

10. On information and belief, at all times material hereto, Defendants were the agents, representatives, servants, employees, partners, and/or joint venturers of each and every other Defendant and were acting within the course and scope of said alternative capacity, identity, agency, representation and/or employment and were within the scope of their authority, whether actual or apparent. Each of the Defendants are responsible in some manner for one or more of the events and happenings described herein. Each Defendant approved and/or ratified the conduct of each other Defendant. Consequently, each Defendant is jointly and severally liable to Plaintiffs for the damages sustained as a proximate result of his, her, or its conduct. Each of the Defendants proximately caused the injuries and damages alleged.

11. Whenever reference is made to “Defendants” in this Complaint, such allegation shall be deemed to mean the acts of Defendants acting individually, jointly, and/or severally.

GENERAL FACTUAL ALLEGATIONS

I. LAUSD Allows Jones to Groom and Sexually Assault Bell High School Students.

A. Background on Bell High School.

12. Bell High School opened its doors in 1925 as a public high school within LAUSD. As part of Local District East of LAUSD, Bell High School services students primarily from the cities of Bell, Maywood, and Cudahy.

1 13. Through its Board of Education, LAUSD provided and oversaw the curriculum of
2 Bell High School including requiring all students to take four years of English. Upon information
3 and belief, LAUSD had complete control and authority over the nature of the curriculum taught in
4 the English classes, and maintained the power and authority to modify, alter, supervise, and suspend
5 any assignment or curriculum unfit with LAUSD's educational goals or for any reason including
6 the safety of its students.

7 14. LAUSD employed an administration team at Bell High School that "coordinate[d]
8 and over[saw] all instructional activity at Bell. Extending far beyond the classroom, activities
9 monitored include all sports, auditorium/performing arts activities, campus buildings/structures,
10 after-school and Saturday community activities, and anything else that effects [sic.] instruction at
11 Bell."¹ At all relevant times, the administration comprised of a Principal and several Assistant
12 Principals, tasked with the various duties and responsibilities for the safekeeping of its students.
13 Moreover, LAUSD hired numerous teachers, custodians, school police and other counselors whose
14 responsibilities included, but were not limited to, monitoring and supervising the Bell High School
15 students.

16 ***B. LAUSD Hires Jones and Facilitates the Grooming of Underage Girls.***

17 15. In the mid- to late- 1980's, LAUSD hired Jones to teach English at Bell High School.
18 Jones taught nearly every level of English including Basic English to Advanced Placement English.

19 16. Under LAUSD's authority, Jones developed assignments tailored at discovering his
20 students' most intimate vulnerabilities. Jones pushed his students to divulge deeply personal and
21 secret details of their lives. The more students revealed about their personal lives, the more Jones
22 learned of his students' vulnerabilities. In Jones's upper-level English classes, this proved
23 particularly valuable for Jones as students were determined and ambitious to succeed. Jones used
24 the information gathered from these assignments to identify students with vulnerable backgrounds,
25 including those who suffered from prior sexual abuse and problems within their respective
26 households.

27
28 ¹ https://www.bellhs.org/apps/pages/index.jsp?uREC_ID=183692&type=d&pREC_ID=382241

1 17. Prior to summer break, Jones would assign writing assignments encouraging his
2 students to keep daily journals about their lives. The students would then submit the journals to
3 Jones during the upcoming school year. Unknown to his students at the time, the journals were
4 never graded or used for academic credit. Upon information and belief, Jones collected the journals
5 to obtain updated information to stay abreast on his students' personal lives, which allowed him to
6 tailor his grooming and improper conduct to the needs of LAUSD's most vulnerable students.

7 18. At school, Jones offered palm/life-line readings to students and teachers. During
8 these readings, Jones would gauge the reactions of the underage minors to his touches and caresses
9 to determine whether the student would be susceptible for further grooming. These readings would
10 occur with the door and windowed portion of door covered, during lunch time and after school
11 hours, under the direct supervision of LAUSD administration, school police, and custodial staff.

12 19. Moreover, outside of proper protocol, Jones began administering
13 psychological/personality tests including the *Myers-Briggs* Type Indicator to his high school
14 English students, and he would review his findings with each student. Upon information and belief,
15 Jones used these tests to further aid in his identification and grooming of vulnerable female students
16 based on the characteristic traits learned from the tests.

17 20. Jones would then take the information learned from these tactics and assignments to
18 strategically identify emotional voids in the lives of vulnerable LAUSD students and tailor his
19 manipulation to gain the trust and confidence of these underage girls.

20 21. Upon information and belief, at no time did LAUSD take any action to modify, alter,
21 monitor, or supervise Jones's curriculum to ensure that the information obtained was not only
22 appropriate, but was not being used for any nefarious reasons. Instead, LAUSD simply looked the
23 other way allowing Jones to prey on several LAUSD students.

24 ***C. Jones Grooms, Sexually Assaults, and Marries Jane Doe 7035.***

25 22. Jane Doe 7035 began attending Bell High School in the Fall of 1986. Jane Doe 7035
26 first met Jones when LAUSD assigned her to Jones's English class. Jones immediately started
27 grooming Jane Doe 7035 by displaying outward favoritism towards Jane Doe 7035, gaining her
28 trust and confidence, and exploiting her weaknesses.

1 23. When she was just 16 years old, Jones orally copulated and vaginally penetrated
2 Jane Doe 7035. Shortly after, Jones flew Jane Doe 7035 to Las Vegas, Nevada where they married
3 on December 2, 1987. Jones eventually stopped Jane Doe 7035 from attending high school and
4 forced her to live in his residence. Soon after, Jones turned physically abusive, and on one occasion,
5 slammed Jane Doe 7035's head into the ground. This pattern of abuse continued until Jane Doe
6 7035 found pictures of Jones with another female student from Bell High School. Shortly after,
7 Jane Doe 7035 ended the relationship and filed for divorce.

8 24. Jane Doe 7035 was unable to give free and/or voluntary consent to the sexual acts
9 perpetrated against her by Jones, as she was a minor at the time of the assaults alleged herein. In
10 addition to Jane Doe 7035 being underage, Jones held a position of authority over Jane Doe 7035
11 as her teacher, educator, and mentor.

12 ***D. Jones Grooms and Marries a Second Bell High School Student.***

13 25. In the late 1980's, while Jones was married to Jane Doe 7035, Jones began grooming
14 another underage student (hereinafter "Student 2"), who was just 13 years old. Jones met Student
15 2 at Bell High School. Jones taught English to Student 2 and employed the grooming tactics
16 discussed herein to discover her weaknesses and foster a deep trust with the minor.

17 26. Ultimately, Jones kissed, harassed, fondled, vaginally penetrated, and orally
18 copulated Student 2 while she was just a young child. On September 18, 1990, Jones married
19 Student 2 in Las Vegas when she was a young teenager.

20 27. Student 2 was unable to give free and/or voluntary consent to the sexual acts
21 perpetrated against her by Jones, as she was a minor at the time of the assaults alleged herein. In
22 addition to being underage, Jones held a position of authority over Student 2 as her teacher,
23 educator, and mentor.

24 ***E. Jones Grooms, Sexually Assaults, and Marries Jane Doe 7064.***

25 28. Jane Doe 7064 started as a Freshman at Bell High School. In 1994, Jane Doe 7064
26 met Jones through a friend while on campus. Unknown to Jane Doe 7064 at the time, and upon
27 information and belief, Jones approached Jane Doe 7064's counselor in the 1994-1995 school year
28 to have Jane Doe 7064 assigned to his class for the following year. With the support and approval

1 of LAUSD, and without additional inquiry about Jones's request, LAUSD complied and assigned
2 Jane Doe 7064 to Jones's class.

3 29. Similar to his other victims, Jones assigned Jane Doe 7064 writing assignments
4 aimed at gaining access into Jane Doe 7064's personal thoughts and vulnerabilities, which included
5 socioeconomic difficulties, an unstable family, and prior issues with sexual abuse. Knowing Jane
6 Doe 7064's vulnerabilities, Jones used this information to gain the confidence and trust of Jane Doe
7 7064.

8 30. Shortly after Jane Doe 7064 turned 17, Jones influenced Jane Doe 7064 to move into
9 his home where he was still living with Student 2, Jones's second wife. Jones convinced Jane Doe
10 7064 that he only married Student 2 for immigration purposes, claiming a lack of romantic or
11 emotional attachment.

12 31. During her senior year, while still a minor, Jones orally copulated and vaginally
13 penetrated Jane Doe 7064, taking her virginity. Learning of Jane Doe 7064's staunch religious
14 beliefs through her journals and written assignments, Jones knew that once he stole Jane Doe 7064's
15 virginity, his manipulation would become effortless. Jones continued to sexually assault Jane Doe
16 7064 two to three times a week until she was 18 years old.

17 32. Less than a month after Student 2's divorce was finalized, Jones married Jane Doe
18 7064 on August 26, 2004.

19 ***F. Jones Grooms and Sexually Assaults Jane Doe 7063.***

20 33. In the Fall of 1997, Jane Doe 7063 started as a freshman at Bell High School and
21 was placed in Jones's freshman English class. Throughout Jane Doe 7063's first year, Jones learned
22 of issues in Jane Doe 7063's household through various assignments discussed herein, and started
23 to tailor his grooming efforts to become a pervasive presence in Jane Doe 7063's life. Jane Doe
24 7063 would regularly stay with Jones in his classroom before school, after school, and during her
25 nutrition breaks. Jones used these opportunities to groom and gain the trust and confidence of Jane
26 Doe 7063.

27 34. During Jones's English class, Jones administered the *Myers-Briggs* personality test
28 to Jane Doe 7063 and her other classmates. Jones then met individually with Jane Doe 7063 and

1 began explaining to her the type of person she is and the characteristics she should have. In fact,
2 Jones's persuasion was so strong that he dissuaded Jane Doe 7063 from pursuing math and science,
3 which she was passionate about. Upon information and belief, Jones did these tests to groom certain
4 personality and characteristic traits into Jane Doe 7063, which he would later use to her detriment.

5 35. Between 2000 and 2001, Jane Doe 7063 would skip other classes and begin sitting
6 in Jones's classroom. Jones became more flirtatious Jane Doe 7063 in the presence of other students
7 and teachers. During Jones's classes, Jane Doe 7063 recalls that Jones would scan the girls in his
8 class as he would say: "I can always tell who's a virgin and who's not."

9 36. Jane Doe 7063's presence with Jones was so pervasive that Swim Coach Pamela
10 Williams approached Jane Doe 7063 and told her that she "didn't think it was appropriate" and
11 advised her to stop going to Jones's classroom. Upon information and belief, Coach Williams
12 reported Jane Doe 7063 and Jones's relationship to Principal Melquiades Mares. In addition, Jane
13 Doe 7063's truancy throughout the year was ultimately escalated to Principal Mares, who learned
14 that Jane Doe 7063 was spending an unreasonable amount of time in Jones's classrooms instead of
15 attending her own. Rather than investigate Jones's behavior, Principal Mares threatened to prevent
16 Jane Doe 7063 from graduating. Neither Coach Williams nor Principal Mares contacted any law
17 enforcement, opened an investigation, limited Jones's interaction with underage minors, or
18 disciplined Jones in any way.

19 37. Jane Doe 7063 was unable to give free and/or voluntary consent to the sexual acts
20 perpetrated against her by Jones, as she was a minor at the time of the grooming alleged herein. In
21 addition to Jane Doe 7063 being underage, Jones held a position of authority over Jane Doe 7063
22 as her teacher, educator, and mentor.

23 ***G. Jones Attempts to Groom Yet Another Student.***

24 38. Upon information and belief, in 1999, Jones began grooming a Bell High School
25 student (hereinafter "Student 5"), who was targeted by Jones through his grooming techniques
26 discussed herein.

1 39. Shortly before Jane Doe 7064 got pregnant in 2004, Jones attempted to convince
2 Student 5, who was pregnant at the time, to live with him and Jane Doe 7064. Before Student 5
3 could move-in, Student 5's mother prevented her from doing so.

4 ***H. Jones Grooms and Sexually Assaults 12-Year-Old Girl.***

5 40. In December of 2011, Cynthia Dunaway met 51-year-old Jones through an internet
6 dating site. At the time, Jones was teaching for Libra Academy in Huntington Park, another
7 LAUSD school. She moved in with Jones within two weeks of meeting him and brought her two
8 young daughters (ages 8 and 11, respectively) to live with him. Dunaway worked nights and left
9 her two little girls in Jones's care. Jones began molesting Dunaway's oldest child when she was
10 just 12 years old.

11 41. On May 9, 2013, a 13-year-old did something LAUSD refused to do for 26 years—
12 she reported Jones to the appropriate authorities for his sexual misconduct. Jones was arrested
13 shortly thereafter.

14 ***I. Jones is Convicted and Sentenced.***

15 42. On October 21, 2016, Jones was convicted of criminal charges related to the sexual
16 assaults and rape of the young girl. On March 17, 2017, Jones was sentenced to the maximum term
17 allowed by law.

18 **II. LAUSD Knew or Should Have Known that Jones Targeted and Sexually Assaulted**
19 **Minors.**

20 43. Prior to, and while Jones was sexually assaulting Plaintiffs, Defendants knew or
21 should have known, or were otherwise on notice, that Jones had violated his role as an English
22 teacher and custodian of children. Defendants also knew or should have known that Jones was
23 misusing and/or abusing his position of authority and trust to gain access to minors, both on and off
24 the LAUSD high school campus, to sexually assault them.

25 44. Upon information and belief, after obtaining sufficient information to begin
26 grooming individual students, Jones approached the counselors of some of the targeted students
27 and arranged for these children to be placed in his classes. Jones's selection of underage, Hispanic
28

1 girls should have been a clear “red flag” to LAUSD’s personnel warranting further investigation
2 and questioning.

3 45. In 1987/1988, after learning that Jones took Jane Doe 7035 to Las Vegas to get
4 married, Jane Doe 7035’s sister became upset and informed the then-Principal of Bell High School
5 that Jones was engaging in sexual relations with Jane Doe 7035. Despite LAUSD officials being
6 told about Jones’s perversion with young females, no disciplinary conduct was initiated against
7 Jones, and no formal investigation was ever conducted concerning the inappropriate relationship.

8 46. In 1994, LAUSD was provided direct and actual notice of Jones’s grooming
9 attempts when Jones, outside of any established school protocol, approached Jane Doe 7064’s high
10 school counselor requesting Jane Doe 7064 to be placed in his class. At a minimum, this should
11 have provided inquiry notice to LAUSD that Jones was undertaking selective grooming of underage
12 Hispanic girls, and LAUSD should have inquired further into Jones’s requests while maintaining
13 an appropriate level of supervision and monitoring on Jones. LAUSD took no efforts to investigate,
14 inquire, or question Jones’s requests. Instead, LAUSD encouraged, aided, abetting, and facilitated
15 the sexual grooming and assault of numerous LAUSD students.

16 47. As set forth herein, LAUSD missed several opportunities to fulfill its obligation to
17 its students and put an end to Jones’s abuse. As another example, LAUSD Coach Williams
18 expressly admitted her knowledge that Jones was involved in an inappropriate relationship when
19 she conveyed her concerns directly to Jane Doe 7063 and later to Principal Mares. However, Coach
20 Williams, as LAUSD’s agent, failed her responsibility and duty to report the suspected sexual
21 misconduct to law enforcement.

22 48. Despite being provided actual notice of Jones’s misconduct: school personnel never
23 (1) investigated the allegations with the minors; (2) limited Jones interaction until an investigation
24 could occur; (3) interviewed any of the victims/witnesses; (4) attempted to console the victims; (5)
25 provided the victims the opportunity to seek appropriate counseling; or (6) reported Jones’s conduct
26 to the appropriate authorities including, but not limited to, school police who were easily accessible
27 and regularly present on the LAUSD campus.

1 49. Upon information and belief, in or about 2004, a Bell High School teacher, Carolina
2 Martinez started dating Jones the day after Jones married Jane Doe 7064. Jane Doe 7064 informed
3 Martinez that Jane Doe 7064 dated Jones when she was still a student. Jane Doe 7064 explained to
4 her that she was now married to Jones and that she was the third student-wife of Jones. Despite
5 having knowledge that Jones was engaged in a sexual misconduct and married a underage students,
6 Martinez a then-LAUSD agent/employee, failed to report Jones to the appropriate authorities.

7 50. Despite years of the same staff, school police, and custodians watching Jones groom
8 minor students for sexual abuse, including frequent and affectionate displaying of touching,
9 hugging, open and intimate conversations and closed-door meetings, LAUSD failed to recognize,
10 investigate, or inquire into clear signs of “red flags” and inappropriate conduct.

11 51. Jones married three LAUSD students. Any reasonable school district should have
12 recognized this clear “red flag” as sufficient warning that Jones had a predisposition for sexual
13 misconduct with underage students, thereby triggering an obvious responsibility to question,
14 inquire, and investigate Jones’s misconduct.

15 **III. LAUSD Failed to Protect its Minor Students, including Plaintiffs.**

16 52. At all relevant times, Jones was an adult male employed by LAUSD as a teacher at
17 Bell High School. In such capacity, Jones was under the direct supervision, employ, agency, and
18 control of LAUSD and DOES 3-20. Therefore, LAUSD had a special relationship with Jones, and
19 thus a duty to warn and protect Plaintiffs from harm by them. Similarly, Jones’s duties and
20 responsibilities with LAUSD included, in part, providing for the supervision, counseling, advisory,
21 educational, and emotional needs and well-being of the students of Bell High School.

22 53. The toxic culture created by LAUSD and disseminated by Principal Mares, and
23 others, created an environment with no oversight or accountability that allowed Jones to prey on
24 these young children. LAUSD fostered, enabled, and condoned a culture of sexual indiscretion by
25 allowing Jones and others to prey on vulnerable girls with no accountability or repercussion.

26 54. Plaintiffs are informed and believe, and thereon allege, that at all times relevant
27 herein, LAUSD owned, operated, maintained, controlled, and staffed Bell High School. LAUSD
28 promoted Bell High School as a safe place where students could obtain a quality and safe education.

1 55. Plaintiffs are informed and believe, and thereon allege, that in employing Jones as a
2 teacher at Bell High School, Defendants gave him full power, control, and authority to provide
3 teaching, mentoring, and/or counseling services to LAUSD's students. By continuing to employ
4 him, LAUSD held Jones out to be a professional and safe teacher at Bell High School.

5 56. As an employee, and with the endorsement of LAUSD, Jones stood in a position of
6 power, respect, confidence, trust, and authority among Plaintiffs and numerous other minor
7 students. Defendants lodged with Jones the color of authority, through which they were able to
8 influence, direct, and assault Plaintiffs, and to act illegally, unreasonably, and without respect for
9 the person and safety of Plaintiffs.

10 57. At all times relevant hereto, Defendant LAUSD was responsible for the supervision
11 of its employees' and agents' activities, including those of Jones, and assumed responsibility for
12 the well-being of the minors in its care, including Plaintiffs.

13 58. Additionally, as a minor child under the custody, care, and control of Defendants,
14 Defendants stood *in loco parentis* with respect to Plaintiffs while he attended class, other
15 educational and extracurricular activities, and other school-related functions at Bell High School.
16 As the responsible party and/or employer controlling Jones, LAUSD also was in a special
17 relationship with Plaintiffs and owed special duties to them.

18 59. Prior to and during the sexual harassment, molestation, and assault of Plaintiffs,
19 LAUSD knew or should have known, or was otherwise on notice, that Jones violated his respective
20 roles as a teacher and used his position of authority and trust acting on behalf of LAUSD to gain
21 access to young children, including Plaintiffs, on and off LAUSD's facilities and grounds, which
22 he used his power and authority to inappropriately touch, molest, abuse, and assault Plaintiffs.

23 60. Defendant LAUSD is liable both directly and as a result of vicarious liability for the
24 failure of its administrative staff to reasonably supervise its employees. (See *C.A. v. Williams S.*
25 *Hart Union High School Dist.* (2012) 53 Cal.4th 861).

26 61. It simply cannot be disputed under California law that a special relationship and
27 heightened duty extended to Plaintiffs in these circumstances. "A special relationship is formed
28 between a school district and its students resulting in the imposition of an affirmative duty on the

1 school district to take all reasonable steps to protect its students.” (See *M.W. v. Panama Buena*
2 *Vista Union School Dist.* (2003) 110 Cal.App.4th 508, 517).

3 62. Pursuant to the inquiry notice standards applicable to this situation, “[i]t is not
4 necessary to prove that the very injury which occurred must have been foreseeable by the school
5 authorities in order to establish that their failure to provide additional safeguards constituted
6 negligence. Their negligence is established if a reasonably prudent person would foresee that
7 injuries of the same general type would be likely to happen in the absence of such safeguards.”
8 (*J.H. v. Los Angeles Unified School Dist.* (2010) 183 Cal. App.4th 123, 146). Furthermore, it is
9 well-settled that “[f]oreseeability is determined in light of all the circumstances and does not require
10 prior identical events or injuries.” (*M.W., supra*, 110 Cal.App.4th at 519).

11 63. The act of grooming, in and of itself, is a crime under California law. It is also
12 foreseeable to LAUSD that Jones’s grooming behavior could lead to sexual assault if unchecked.
13 This is particularly true in light of the specific grooming that took place in this case.

14 64. Defendant LAUSD had inquiry notice of the risks presented by Jones, as alleged
15 herein, and had a special relationship with Plaintiffs that required it to warn and protect Plaintiffs
16 from the abuse by Jones.

17 65. Defendants had a duty to disclose these facts to Plaintiffs, their parents, and others,
18 but negligently and/or intentionally suppressed, concealed, or failed to disclose this information for
19 the express purpose of maintaining Jones’s respective image as an ethical, wholesome, safe, and
20 trusted teacher at LAUSD. The duty to disclose this information arose from the special, trusting,
21 confidential, fiduciary, and *in loco parentis* relationship between Defendants and Plaintiffs.

22 66. As a direct and proximate result of Plaintiff’s sexual assault by Jones, which was
23 enabled and facilitated by Defendants, Plaintiffs have suffered injury, all to her general, special,
24 and consequential damage in an amount to be proven at trial, but in no event less than the minimum
25 jurisdictional amount of this Court.

26 67. LAUSD’s liability arises from its employees’ and agents’ actions taken within the
27 course and scope of their employment subsequent to Jones’s grooming and/or assaults of Plaintiffs.
28 (*C.A. v. William S. Hart Union High School Dist.* (2012) 53 Cal.4th 861, 879).

1 68. Defendants knew or should have known of Jones's propensity and disposition to
2 engage in sexual misconduct with minors before and during the period where he sexually assaulted
3 and harassed Plaintiffs, and knew of the probability that he would harass minors with whom he
4 came into contact, such as Plaintiffs. On information and belief, if LAUSD took any reasonable
5 efforts to investigate Jones's assignments, closed-door palm readings, or his marriage of three
6 underage Bell High School Students, numerous children could have been saved from Jones's
7 deviant desires.

8 69. As students of Bell High School and LAUSD, where Jones was employed and
9 worked, Plaintiffs were under LAUSD's supervision, care, and control, which created a special or
10 fiduciary relationship. It was through this position of trust and confidence that Jones exploited
11 Plaintiffs in perpetuating his sexual assaults upon them.

12 70. On information and belief, Defendants' failure to take appropriate action against
13 Jones to protect its students and the public at-large resulted in Jones's ability to continue to enjoy
14 access to minors at Bell High School.

15 71. As a direct and proximate result of Jones sexually assaulting Plaintiffs, which was
16 enabled and facilitated by Defendants, Plaintiffs have suffered injury, all to Plaintiffs' general,
17 special, and consequential damages in an amount to be proven at trial, but in no event less than the
18 minimum jurisdictional amount of this Court.

19 72. The sexual acts perpetrated upon Plaintiffs by Jones constitute childhood sexual
20 assault as defined by California Code of Civil Procedure section 340.1, as modified by Assembly
21 Bill 218, and were a violation of the California Penal Code, including, but not limited to, Penal
22 Code sections 287, 288.3, 288.4, 289, and 647.6. Plaintiffs are informed and believes and thereon
23 alleges that all of the sexually abusive and harassing conduct alleged herein was done to satisfy
24 Jones's respective prurient sexual desires.

25 73. Due to LAUSD's failure to uphold and fulfill its duties, Jones went on to groom,
26 sexually assault, and ultimately ruin the lives of numerous minor underage girls who were placed
27 in LAUSD's care.

28

1 **FIRST CAUSE OF ACTION**

2 **NEGLIGENCE**

3 **(Against Defendants LAUSD and DOES 3–20)**

4 74. Plaintiffs repeat, re-allege, and incorporate herein by reference all consistent
5 paragraphs of this Complaint as if fully set forth herein.

6 75. Pursuant to California Government Code section 815.2, LAUSD is liable for injuries
7 proximately caused by the acts or omissions of its employees, agents, servants and/or joint
8 venturers, where such acts or omissions were within the course and scope of employment.

9 76. Defendants' employees' conduct, actions, and omissions served to create an
10 environment in which Jones was afforded continuous secluded access to Plaintiffs, on and off
11 campus under school sanctioned events. Plaintiffs were sexually abused, molested and assaulted
12 by Jones.

13 77. Compulsory education laws create a special relationship between students and
14 Defendants, and students have a constitutional guarantee to a safe, secure, and peaceful school
15 environment. Defendants failed to acknowledge unsafe conditions and red flags in that sexual
16 predator's behavior, and therefore failed to guarantee safe surroundings in an environment in which
17 Plaintiffs were not free to leave. Even more egregious, Defendants failed to have concrete rules
18 and/or failed to enforce those rules regarding staff relationships with students designed to protect
19 minor students from sexual abuse.

20 78. As is set forth herein, Defendants failed to uphold numerous mandatory duties
21 imposed upon them by state and federal law, and by written policies and procedures applicable to
22 Defendants, including, but not limited to, the following: (1) duty to use reasonable care to protect
23 students from known or foreseeable dangers; (2) duty to protect students and staff and provide
24 adequate supervision; (3) duty to supervise faculty and students and enforce rules and regulations
25 prescribed for schools, exercise reasonable control over students as is reasonably necessary to
26 maintain order, protect property, or protect the health and safety of faculty and students or to
27 maintain proper and appropriate conditions conducive to learning; (4) duty to act promptly and
28 diligently and not ignore or minimize problems; (5) duty to refrain from violating Plaintiffs' right

1 to protection from bodily restraint or harm; and (6) mandatory duty to report known or suspected
2 incidents of sexual misconduct and abuse in accordance with Penal Code section 11166.

3 79. Defendants had a duty to protect students, including Plaintiffs, who were entrusted
4 to Defendants' care. Defendants owed Plaintiffs, minors at the time, a special duty of care, in
5 addition to a duty of ordinary care, and owed Plaintiffs the higher duty of care that adults dealing
6 with minors owe to protect them from harm. Defendants were required, but failed, to provide
7 adequate supervision and failed to be properly vigilant in ensuring that such supervision was
8 sufficient to ensure the safety of Plaintiffs and others minors exposed to Jones by LAUSD.

9 80. LAUSD was required but failed to exercise careful supervision of the moral
10 conditions in their school. This duty extended beyond the classroom. LAUSD had a duty to and
11 failed to adequately train and supervise all counselors, advisors, teachers, mentors, school police,
12 custodians, and staff to create a positive and safe educational, learning environment, including
13 training to perceive, report and stop inappropriate conduct by other members of the staff,
14 specifically including Jones, with minors.

15 81. By virtue of his unique authority and position as English teacher for Bell High
16 School, Jones was able to identify vulnerable victims and their families, such as Plaintiffs, upon
17 which he could perform sexual assault; to manipulate his authority to procure compliance with his
18 sexual demands from his victims; and to induce the victims to continue to allow the assaults.
19 Through his position, Jones had unique access to, and held a position of authority among, students
20 who were attending LAUSD.

21 82. Defendants, by and through their agents, servants, and employees, knew or
22 reasonably should have known of Jones's sexually abusive and exploitative propensities and/or that
23 Jones was an unfit agent during his employment. It was foreseeable that if Defendants did not
24 adequately exercise or provide the duty of care owed to minors in their care, including but not
25 limited to Plaintiffs, the minor entrusted to Defendants' care would be vulnerable to sexual assault
26 by Jones.

27 83. Defendants breached their duty of care to Plaintiffs by allowing Jones to come into
28 contact with them as minors without supervision; by failing to properly investigate Jones; by

1 actively shielding Jones from responsibility for his sexual assaults of Plaintiffs and other minors;
2 by failing to inform or concealing from Plaintiffs' parents, guardians, and/or law enforcement
3 officials that Jones was or may have been sexually abusing minors; and by holding out Jones to the
4 Bell, Cudahy, and Maywood community as being a person of stature and integrity.

5 84. Pursuant to California Government Code section 815.2, LAUSD is liable for injuries
6 proximately caused by the acts or omissions of its employees, agents, servants and/or joint
7 venturers, where such acts or omissions were within the course and scope of employment.

8 85. Under the Child Abuse and Neglect Reporting Act, Defendants' employees,
9 including their teachers, aides, and administrators, were child care custodians, and thus, were under
10 a statutory duty to report known or suspected incidents of sexual molestation or abuse of minors to
11 a child protective agency, pursuant to California Penal Code section 11166, and/or to not to impede
12 the filing of any such report.

13 86. By failing to report Jones's continuing molestations and abuse, which Defendants
14 knew of or had reason to know of, and by ignoring the fulfillment of the mandated compliance with
15 the reporting requirements provided under California Penal Code section 11166, Defendants
16 created the risk of danger contemplated by the Child Abuse and Neglect Reporting Act, and as a
17 result, unreasonably and wrongfully exposed Plaintiffs and other minors to sexual harassment,
18 molestation, and abuse.

19 87. As students under the supervision of Defendants, Plaintiffs were a member of the
20 class of persons for whom the protection of California Penal Code section 11166 was enacted.

21 88. The physical and emotional damages and injuries resulting from Jones's sexual
22 assaults of Plaintiffs were the type of occurrences and injuries that the Child Abuse and Neglect
23 Reporting Act was designed to prevent.

24 89. Defendants' failure to comply with the mandatory reporting requirements of
25 California Penal Code section 11166 was a substantial factor in bringing about the sexual
26 harassment, molestation, and abuse of Plaintiffs.

90. Defendants' failure to comply with the mandatory reporting requirements of California Penal Code section 11166 also constituted a *per se* breach of Defendants' duties to Plaintiffs and thus amounts to negligence *per se*.

91. As a direct and proximate result of Defendants' multiple and continuous breaches, Plaintiffs have suffered and continue to suffer pain and suffering, relationship and intimacy issues, and emotional distress.

SECOND CAUSE OF ACTION

NEGLIGENT SUPERVISION/RETENTION

(Against Defendants LAUSD and DOES 3–20)

92. Plaintiffs repeat, re-allege, and incorporate herein by reference all consistent paragraphs of this Complaint as if fully set forth herein.

93. Pursuant to California Government Code section 815.2, LAUSD is liable for injuries proximately caused by the acts or omissions of its employees, agents, servants and/or joint venturers, where such acts or omissions were within the course and scope of employment.

94. As an educational institution entrusted with the care of minors, where all students are entrusted to the teachers, counselors, coaches, advisors, mentors, faculty members, and administrators, LAUSD expressly and implicitly represented that these individuals, including Jones, were not a sexual threat to minors and others who would fall under Jones's influence, control, direction, and guidance.

95. It is well-settled that a school district, such as LAUSD, has a duty to supervise its students and employees. Supervision requires more than simply the presence of staff or administration on campus. It requires the knowledge and care as an institution as to the types of foreseeable harm that a student may encounter, and protecting against those harms by establishing, implementing, and enforcing adequate policies and procedures. Supervision requires adequate training, adequate staffing, and adequate involvement by staff and administration. (*J.H. v. Los Angeles Unified School District* (2010) 183 Cal.App.4th 123, 134, 140–41).

96. Defendants failed to provide such supervision to Plaintiffs by allowing Jones to be alone with minor students in violation of its own policies and/or the applicable standard of care.

1 Defendants failed to take reasonable measures to prevent the grooming and sexual abuse of its
2 students, including Plaintiffs.

3 97. On information and belief, Defendants failed to take reasonable steps or implement
4 reasonable safeguards to reasonably investigate, supervise and monitor teachers, or otherwise avoid
5 acts of childhood sexual assault, including by failing to enact adequate policies and procedures or
6 failing to ensure their policies and procedures were followed. Even if such procedures existed on
7 paper, Defendants did not implement any system or procedure to oversee or monitor the conduct
8 towards minors, students, and/or others in its care during the time period alleged herein.

9 98. After being hired by Defendants, Jones openly and obviously groomed and assaulted
10 multiple students, including Plaintiffs. It thus appears that school leadership, staff, and employees
11 were not able to recognize the signs of sexual abuse by Jones due to inappropriate training or lack
12 thereof.

13 99. On information and belief, had the school leadership and staff been trained to
14 recognize red flags associated with grooming and abuse, they would have undertaken to cease,
15 report, and stop Jones's misconduct before Plaintiffs were sexually assaulted on over one-hundred
16 separate occasions.

17 100. While Plaintiffs were being sexually abused by Jones, Defendants knew or should
18 have known of the ongoing grooming and abuse of Plaintiffs and other minor girls, but due to their
19 lack of training, failed to recognize those signs.

20 101. Defendants were aware or should have been aware of minor's significant
21 vulnerability to sexual harassment, molestation and assault by coaches, trainers, and other persons
22 of authority within LAUSD.

23 102. Defendants owed Plaintiffs a duty to provide reasonable supervision of both
24 Plaintiffs and Jones, to use reasonable care in investigating Jones, and to provide adequate warning
25 to Plaintiffs and their families, and to families of other minors who were entrusted to Jones, of
26 Jones's sexually abusive and exploitative propensities and unfitness.

27 103. Defendants owed Plaintiffs a duty not to retain Jones given his actions, which
28 Defendants knew or should have known had they engaged in a meaningful and adequate

1 investigation of his background and/or of allegations of sexual assault of Plaintiffs and other
2 underage girls at Bell High School and other high schools throughout LAUSD.

3 104. Defendants, by and through their agents, servants and employees, knew or should
4 have known of Jones's sexually abusive and exploitative propensities and/or that Jones was an unfit
5 agent. Despite such knowledge, Defendants negligently failed to supervise Jones in his capacity as
6 Plaintiffs' English teacher, mentor, and educator, in which position he was able to commit the
7 wrongful acts against Plaintiffs. Defendants failed to provide reasonable supervision of Jones,
8 failed to use reasonable care in investigating Jones, and failed to provide adequate warning to
9 Plaintiffs and their families regarding Jones's sexually abusive propensities and unfitness.
10 Defendants further failed to take reasonable measures to prevent future sexual assault despite clear
11 warning that such sexual assaults were taking place.

12 105. Defendants failed to properly evaluate Jones's conduct and performance as an
13 employee of, or provider of services to Defendants, and failed to exercise the due diligence
14 incumbent upon employers to investigate employee misconduct, or to take appropriate disciplinary
15 action. Defendants negligently continued to retain Jones as an English teacher, working or
16 providing services for Defendants, which enabled him to continue engaging in the sexually abusive
17 behavior described herein.

18 106. Defendants should have known that Jones had engaged in dangerous and
19 inappropriate conduct, and it was reasonably foreseeable that Jones was engaging in, or would
20 engage in, illicit sexual activities with Plaintiffs.

21 107. Defendants breached their duties to Plaintiffs by, *inter alia*, failing to adequately
22 monitor, investigate, and supervise Jones and failing to stop Jones from committing wrongful
23 sexual acts with minors, including Plaintiffs, and continued to retain Jones despite clear warnings
24 that sexual assaults of minors were occurring.

25 108. As a direct and proximate result of Defendants' multiple and continuous breaches,
26 Plaintiffs have suffered and continue to suffer pain and suffering, relationship and intimacy issues,
27 and emotional distress.

28

1 **THIRD CAUSE OF ACTION**

2 **SEXUAL BATTERY**

3 **(Against Defendant Jones)**

4 109. Plaintiffs repeat, re-allege, and incorporate herein by reference all consistent
5 paragraphs of this Complaint as if fully set forth herein.

6 110. During Plaintiffs' time as minor students at Bell High School, Jones intentionally,
7 recklessly, and wantonly made sexual advances, solicitations, and requests for sexual compliance
8 based on Plaintiffs' gender that were pervasive, and severe. The sexual harassment and assault
9 included, but was not limited to, massaging, manipulating, and fondling Plaintiffs' entire respective
10 bodies, including Plaintiffs' genitals; putting his mouth on Plaintiffs' genitals; and coercing
11 Plaintiffs to be vaginally penetrated. These incidents of sexual assault occurred while Plaintiffs
12 were under the control of LAUSD and their agents acting in their capacity as teachers, counselors,
13 mentors, advisors, and administrators on behalf of Defendants.

14 111. Jones did the aforementioned acts with the intent to cause a harmful or offensive
15 contact with an intimate part of Plaintiffs' persons and would offend a reasonable sense of personal
16 dignity. Further, said acts did cause a harmful or offensive contact with an intimate part of
17 Plaintiffs' person that would offend a reasonable sense of personal dignity. Jones knew or had
18 reason to know that he was committing these acts against Plaintiffs.

19 112. Because of Jones's position of authority over Plaintiffs, Plaintiffs' mental and
20 emotional states, and Plaintiffs' status as minors, Plaintiffs were unable to give meaningful consent
21 to such acts.

22 113. As a result of the above-described conduct, Plaintiffs have suffered and continue to
23 suffer pain and suffering, relationship and intimacy issues, and emotional distress.

24 114. In subjecting Plaintiffs to the wrongful treatment alleged herein, Jones acted
25 willfully and maliciously with the intent to harm Plaintiffs and in conscious disregard for Plaintiffs'
26 rights so as to constitute malice and oppression under Civil Code section 3294. Plaintiffs is
27 therefore entitled to the recovery of punitive damages in a sum to be shown according to proof at
28 trial against Jones.

1 **FOURTH CAUSE OF ACTION**

2 **SEXUAL HARASSMENT**

3 **(Against Defendants LAUSD and Jones)**

4 115. Plaintiffs repeat, re-allege, and incorporate herein by reference all consistent
5 paragraphs of this Complaint as if fully set forth herein.

6 116. Pursuant to California Government Code section 815.2, LAUSD is liable for injuries
7 proximately caused by the acts or omissions of its employees, agents, servants and/or joint
8 venturers, where such acts or omissions were within the course and scope of employment.

9 117. During Plaintiffs' time as minor students at Bell High School, Jones intentionally,
10 recklessly, and wantonly made sexual advances, solicitations, requests, and demands for sexual
11 compliance of a hostile nature based on Plaintiffs' gender that were unwelcome, pervasive, and
12 severe. The sexual harassment and assault included, but was not limited to, massaging,
13 manipulating, and fondling Plaintiffs' entire body, including Plaintiffs' genitals; putting his mouth
14 on Plaintiffs' genitals; and coercing Plaintiffs to be vaginally penetrated. These incidents of sexual
15 assault occurred while Plaintiffs were under the control and custodial care of LAUSD and their
16 agents acting in their capacity as teachers, counselors, mentors, advisors, and administrators on
17 behalf of Defendants.

18 118. Because of Plaintiffs' relationship with Defendants and Plaintiffs' age of minority,
19 Plaintiffs were unable to terminate the relationship they had with Defendants.

20 119. Because of Jones's age and position of authority, Plaintiffs' mental and emotional
21 state, and Plaintiffs' age of minority, Plaintiffs were unable to give meaningful consent to their acts.

22 120. Even though Defendants knew or should have known of these activities by Jones,
23 Defendants did nothing to investigate, report, supervise, or monitor Jones to ensure the safety of
24 minors.

25 121. On information and belief, Defendants ratified and authorized Jones's sexual
26 harassment, battery, and assault of Plaintiffs by (1) allowing Jones to come into contact with
27 Plaintiffs minors without supervision; (2) failing to inform or concealing from Plaintiffs' parents,
28 guardians, or law enforcement officials that Jones was or may have been sexually abusing minors;

1 (3) by holding out Jones to the LAUSD community at large as being in good standing and
2 trustworthy as a person of stature and integrity; (4) failing to take steps to timely remove Jones from
3 Defendants' employ so as to prevent him from using his authority bestowed upon him by
4 Defendants to gain access to minors and sexually harass and assault them; (5) actively shielding
5 Jones from responsibility for her sexual harassment and assault of Plaintiffs and other minors; and
6 (6) moving him from LAUSD school to LAUSD school despite knowledge of his sexual
7 misconduct with underage students.

8 122. Though not authorized to do so, Jones used his authority, power, and position as a
9 teacher, educator, and confidante of LAUSD to carry out the sexual assaults of Plaintiffs, and others,
10 on behalf of LAUSD. LAUSD learned of Jones's unauthorized, and heinous conduct, through the
11 numerous reports to LAUSD's staff by parents and students of the sexual misconduct by Jones.
12 Despite the numerous reports to LAUSD's administration of Jones's misconduct that Jones sexually
13 assaulted these minor children, LAUSD's administration took no action to punish Jones, including
14 failing to discipline him, removing him from the classroom, or limiting or supervising his
15 interactions with minor students. Instead, LAUSD continued to retain him as a teacher, and even
16 granted him further access to more of LAUSD's students in other schools within LAUSD, such as
17 Gahr High School and Libra Academy. By allowing Jones's misconduct to remain unchecked,
18 LAUSD sanctioned, promoted, and encouraged Jones's conduct of grooming young female
19 students to position himself to assault these minor students with no regard for their safety or
20 humanity.

21 123. Defendants' conduct (and the conduct of their agents) was a breach of their duties
22 to Plaintiffs.

23 124. As a direct and proximate result of Defendants' sexual harassment, Plaintiffs have
24 suffered and continue to endure pain and suffering, relationship and intimacy issues, and emotional
25 distress.

26 125. In subjecting Plaintiffs to the wrongful treatment alleged herein, Jones acted
27 willfully and maliciously with the intent to harm Plaintiffs and in conscious disregard for Plaintiffs'
28 rights so as to constitute malice and oppression under Civil Code section 3294. Plaintiffs are

1 therefore entitled to the recovery of punitive damages in a sum to be shown according to proof at
2 trial against Jones.

3 126. Plaintiffs also seek appropriate statutory penalties and attorney's fees pursuant to
4 section 52 of the Civil Code.

5 **PRAYER FOR RELIEF**

6 WHEREFORE, Plaintiffs pray for the following relief against Defendants:

- 7 1. For past, present, and future general damages in an amount to be determined at trial;
 - 8 2. For past, present, and future special damages, in an amount to be determined at trial;
 - 9 3. Any appropriate statutory damages;
 - 10 4. For cost of suit;
 - 11 5. For interest as allowed by law;
 - 12 6. For punitive or exemplary damages as to Jones;
 - 13 7. For attorney's fees pursuant to Code of Civil Procedure section 1021.5 and Civil
14 Code section 51.9(b), or otherwise as allowable by law; and
 - 15 8. For such other and further relief as the Court may deem proper.
- 16

17 DATED: November 8, 2022

GREENBERG GROSS LLP

18
19 By: 

20 Brian L. Williams
21 Heather A. Brown
22 Brian P. Suba

23 JEFF ANDERSON & ASSOCIATES
24 Michael Reck
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26 *Attorneys for Plaintiffs*
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DATED: November 8, 2022

By:

JEFF ANDERSON & ASSOCIATES
Michael Reck
Hagerey Mengistu

DEMAND FOR JURY TRIAL