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Attorneys for Plaintiffs
EMMANUEL STEPHENS; JASMINE WHITLEY; DAVIAN GEORGE;
and EMANI STEPHENS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

EMMANUEL STEPHENS; JASMINE
WHITLEY; DAVIAN GEORGE; and
EMANI STEPHENS;

Plaintiffs

v.

CITY OF SAN JOSE; SAN JOSE
POLICE DEPARTMENT; and DOES 1-
25, inclusive,

Defendants

CASE NO. _____

COMPLAINT FOR DAMAGES

JURY TRIAL DEMANDED

Plaintiffs allege:

1. Plaintiff EMMANUEL STEPHENS is a resident of the City of San Jose,
County of Santa Clara.

2. Plaintiff JASMINE WHITLEY is a resident of the City of San Jose,
County of Santa Clara.

3. Plaintiff DAVIAN GEORGE, age 14, is a resident of the City of San Jose,
County of Santa Clara and the minor child of plaintiffs Stephens and Whitley.

1 4. Plaintiff EMANI STEPHENS, age 7, is a resident of the City of San Jose,
2 County of Santa Clara and the minor child of plaintiffs Stephens and Whitley.

3 5. Defendant CITY OF SAN JOSE is a municipal entity, which includes the
4 administration of and responsibility for defendant SAN JOSE POLICE DEPARTMENT.
5

6 6. Defendant SAN JOSE POLICE DEPARTMENT is a law enforcement
7 agency in and for defendant San Jose.

8 7. Plaintiffs are ignorant of the true names and capacities of defendants Does
9 1-25, inclusive, and sues such defendants by such fictitious names. Plaintiffs will amend this
10 complaint to include the true names and capacities of such fictitiously named defendants if and
11 when such true names and capacities are ascertained.
12

13 8. At all times alleged herein, each defendant and each police officer
14 identified below was acting as the agent, employee, servant and/or representative of each other
15 defendant and each other police officer identified below and in committing the acts and
16 omissions alleged herein, each defendant and each police officer identified below was acting in
17 the course and scope of such agency, employment, servitude and/or representation, such that
18 each defendant is jointly and severally liable for each other defendant and each police officer
19 identified below is jointly and severally liable for each other police officer identified below.
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21

22 **JURISDICTION**

23 9. This Court has jurisdiction because the First Cause of Action arises under
24 42 U.S.C. §1983 and the Court has supplemental jurisdiction over the Second and Third Causes
25 of Action pursuant to 28 U.S.C. §1367.
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VENUE

10. Venue is proper in the San Jose Division of the Northern District of California because the acts and omissions alleged herein arose in the City of San Jose, CA, County of Santa Clara.

GENERAL ALLEGATIONS

11. On or about October 30, 2014, plaintiff Stephens was lawfully going about his business and went to pick up his daughters, plaintiff Emani, age 7, and plaintiff Davian, age 14, from school. Plaintiff Stephens picked his daughters up and stopped to get snacks on their way home, with plaintiff Stephens remaining in his car while his two daughters, age 7 and 14, went in and got snacks. At the time that plaintiff Stephens and his minor daughters stopped for snacks, a police officer employed by defendant SJPD, Officer Alexander Keller, began following plaintiff Stephens and his two minor daughters, although neither plaintiff Stephens, plaintiff Emani or plaintiff Davian were engaged in any unlawful or suspicious behavior. Plaintiffs are informed and believe and thereon allege that the only reason that Officer Keller began following them in his patrol car is because plaintiffs Stephens, Davian and Emani are African-American and that Officer Keller was racially-profiling them and engaged in prohibited race-based law enforcement activities.

12. Plaintiffs Stephens, Davian and Emani arrived at their home in the City of San Jose, at which point plaintiff Emani exited the vehicle to get the mail and plaintiff Davian came out of the house to open the garage door. Officer Keller jumped out of his patrol car with his weapon drawn and yelled at plaintiff Stephens to "put your hands up! Get back, get back." When plaintiff Stephens asked "what's going on?", Officer Keller then responded "Shut up before I tase you," despite the fact that plaintiff Stephens did not present any indication of

1 aggressive intent or pose or appear to pose any threat to anyone. Neither plaintiff Stephens,
2 Davian nor Emani were engaged in any unlawful or suspicious behavior and posed no threat to
3 public safety to warrant Officer Keller drawing his gun and aiming it at plaintiffs Stephens,
4 Davian and Emani and threatening to tase plaintiff Stephens. Plaintiffs are informed and believe
5 and thereon allege that the only reason that Officer Keller drew his gun, pointed it at plaintiffs
6 Stephens, Davian and Emani and threatened to tase plaintiff Stephens is because plaintiffs
7 Stephens, Davian and Emani are African-American and that Officer Keller was racially-profiling
8 them and engaged in prohibited race-based law enforcement activities.
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11 13. Plaintiffs Stephens, Davian and Emani were terrified of this encounter and
12 plaintiff Emani burst into tears and ran into the house to inform her mother, plaintiff Whitley,
13 that “the police have a gun and they’re going to take daddy to jail!” Plaintiff Whitley came
14 outside and observed Officer Keller shoving plaintiff Stephens into the patrol car and ignoring
15 plaintiff Stephens reasonable requests as to why he was being detained. Plaintiff Whitley also
16 inquired of the police officer why her husband was being detained and in response to such
17 inquiries, Officer Keller yelled at plaintiff Whitley, “Get on the curb and shut up!”
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20 14. In light of Officer Keller’s unlawful behavior, plaintiff Whitley then
21 instructed her daughter to go inside their home to get plaintiff Whitley’s cell phone so that
22 plaintiff Whitley could document Officer Keller’s unlawful behavior. Officer Keller then told
23 plaintiff Whitley’s daughter, “If you leave, then I’m arresting you too and taking you to juvenile
24 hall.” Plaintiffs are informed and believe and thereon allege that the only reason that Officer
25 Keller told plaintiff Whitley to “shut up” and threatened to arrest plaintiff Whitley’s daughter
26 without any probable cause and despite the fact that plaintiff’s daughter had not engaged in any
27 wrong-doing was because plaintiffs Stephens, Whitley, Davian and Emani are African-American
28

1 and Officer Keller was racially-profiling them and engaged in prohibited race-based law
2 enforcement activities, including seeking to prevent plaintiff Whitley's daughter from recording
3 Officer Keller's racial profiling and race-based law enforcement activities.
4

5 15. Officer Keller handcuffed plaintiff Stephens and detained him in the back
6 of the patrol car. Officer Keller detained the family for approximately 20 minutes, at which
7 point additional police officers arrived on the scene, Officer Kevin Cassidy and Sgt. Damian
8 Bortolotti. Sgt. Damian Bortolotti had authority over and was present to supervise the actions of
9 Officer Keller. Plaintiff Whitley asked Officer Cassidy why her husband was being detained and
10 Officer Cassidy responded that they had gotten a call about a suspicious black man with a purple
11 backpack. Plaintiff Whitley informed the officer that her husband plaintiff Stephens did not have
12 a purple backpack and had never been out of the car for the arresting officer to have even been
13 able to see a purple backpack. Plaintiff Whitley also asked the two responding officers where
14 the (allegedly) suspicious black person had been seen and what (allegedly) made him suspicious
15 and the officers refused to respond to these inquiries. Officer Cassidy stated that "we get calls
16 about once a week about suspicious black people and have to check it out to see what's going on.
17 This happens a lot with black people over here." These comments demonstrated that the only
18 reason plaintiff Stephens was followed, held at gunpoint, threatened with being tased, detained,
19 handcuffed, arrested and his wife and daughters threatened and verbally abused was because they
20 were African-American living in an area that defendant SJPD does not believe African
21 Americans belong as a result of racial profiling and race-based law enforcement activities.
22

23 16. In an effort to cover up his racial-profiling and race-based law
24 enforcement activities, Officer Keller began to search plaintiff Stephens vehicle, including the
25 engine compartment, without probable cause or any exigent circumstances. When plaintiff
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1 Whitley asked Sgt. Bortolotti what Officer Keller was doing and why, the responding officer said
2 “I don’t know what he’s doing” and was unable to explain Officer Keller’s actions, confirming
3 that the arresting officer’s actions had no legitimate law enforcement purpose and further
4 demonstrating Officer Keller’s racial profiling and race-based law enforcement activities. By
5 failing to properly supervise Officer Keller’s actions, Sgt. Bortolotti failed in his own duties and
6 ratified the wrongful conduct of Officer Keller.
7

8 17. Officer Keller found a container of prescription medical marijuana bearing
9 plaintiff Whitley’s name on it. Sgt. Boroloti asked plaintiff Whitley if she had proof that the
10 prescription medical marijuana was lawfully hers, whereupon plaintiff Whitley showed Sgt.
11 Bortolotti her driver’s license and medical marijuana card. Despite such proof, Officer Keller
12 seized the prescription medical marijuana and cited plaintiff Stephens for possession of
13 marijuana. When plaintiff Whitley asked Sgt. Bortolotti why the arresting officer was citing her
14 husband, plaintiff Stephens, when she, plaintiff Whitley, had just proven that the prescription
15 medical marijuana was hers, Sgt. Bortolotti was again unable to explain the arresting officer’s
16 action, stating “it’s his stop,” once again demonstrating that Officer Keller’s actions served no
17 legitimate law enforcement purpose and further demonstrating Officer Keller’s racial profiling
18 and race-based law enforcement activities. By failing to properly supervise Officer Keller’s
19 actions, Sgt. Bortolotti failed in his own duties and ratified the wrongful conduct of Officer
20 Keller.
21

22 18. As a proximate result of the above-described acts and omissions, plaintiffs
23 suffered violations of their Constitutional rights, were unlawfully detained in their personal
24 freedom, subject to illegal search and seizure and suffered extreme emotional distress, fear and
25 anxiety in an amount to be proven at trial and in excess of the jurisdictional limits of this Court.
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19. Plaintiffs filed a complaint with the City of San Jose Office of the Independent Auditor and have been provided with no information regarding the results of any purported investigation of their complaint.

20. Plaintiffs timely submitted claims against the City of San Jose and the San Jose Police Department pursuant to the Tort Claims Act, Government Code §910 *et seq.*, which claims were rejected by the City of San Jose.

FIRST CAUSE OF ACTION
VIOLATION OF 42 U.S.C. §1983
 (All Plaintiffs as to Defendants SAN JOSE and SJPD)

19. Plaintiffs incorporate by this reference paragraphs 1 through 18, inclusive, as though fully set forth herein.

20. 42 U.S.C. §1983 prohibits the violation of Constitutional rights under color of state law.

21. The above-described acts and omissions constituted an unlawful seizure of plaintiffs' persons under color of state law and unlawful search, thereby violating plaintiffs' rights guaranteed under the 4th Amendment of the United States Constitution.

22. As a proximate result of the above-described violation of their rights protected under the United States Constitution under color of state law, plaintiffs suffered extreme emotional distress, fear and anxiety in an amount to be proven at trial and in excess of the jurisdictional limits of this Court.

SECOND CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
 (All Plaintiffs as to Defendants SAN JOSE and SJPD)

23. Plaintiffs incorporate by this reference paragraphs 1 through 22, inclusive, as though fully set forth herein.

24. The above-described acts and omissions were extreme and outrageous and exceed the bounds of all civilized society. Such acts and omissions were intended to, and substantially certain to, cause severe emotional distress and did in fact cause plaintiffs severe emotional distress.

25. As a proximate result of the above-described acts and omissions, plaintiffs each suffered extreme emotional distress, fear and anxiety in an amount to be proven at trial and in excess of the jurisdictional limits of this Court.

THIRD CAUSE OF ACTION NEGLIGENCE

(All Plaintiffs as to Defendants SAN JOSE and SJPD)

26. Plaintiffs incorporate by this reference paragraphs 1 through 25, inclusive, as though fully set forth herein.

27. Defendants each owed a duty of care to plaintiffs, including, without limitation, in the execution of their law enforcement duties.

28. Defendants breached their duty of care owed to plaintiffs as described above.

29. As a proximate result of the above-described breaches of their duties of care owed to plaintiffs, plaintiffs each suffered extreme emotional distress, fear and anxiety in an amount to be proven at trial and in excess of the jurisdictional limits of this Court.

PRAYER FOR RELIEF

WHEREFORE, plaintiffs each pray for relief as follows:

1. For general damages in an amount according to proof at trial;
2. For special damages in an amount according to proof at trial;
3. For costs and attorneys fees as provided by law; and

4. For such other and further relief as the Court deems fair and just.

Dated: July 27, 2015

LAW OFFICES OF PAUL B. JUSTI

By


Paul B. Justi

Attorneys for plaintiffs EMMANUEL
STEPHENS; JASMINE WHITLEY;
DAVIAN GEORGE; and EMANI
STEPHENS

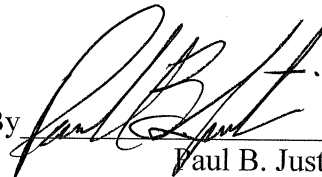
DEMAND FOR JURY TRIAL

Plaintiffs each hereby demand trial by jury.

Dated: July 27, 2015

LAW OFFICES OF PAUL B. JUSTI

By


Paul B. Justi

Attorneys for plaintiffs EMMANUEL
STEPHENS; JASMINE WHITLEY;
DAVIAN GEORGE; and EMANI
STEPHENS

JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

EMMANUEL STEPHENS; JASMINE WHITLEY; DAVIAN GEORGE; AND EMANI STEPHENS

(b) County of Residence of First Listed Plaintiff SANTA CLARA
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

PAUL B. JUSTI; LAW OFFICES OF PAUL B. JUSTI, 1981 N. BROADWAY, SUITE 250, WALNUT CREEK, CA 94596, 925.256.7900

DEFENDANTS

CITY OF SAN JOSE; SAN JOSE POLICE DEPARTMENT; AND DOES 1-25 INCLUSIVE

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTIONCite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
42 USC 1983

Brief description of cause:

VIOLATION OF CONSTITUTIONAL RIGHTS UNDER COLOR OF STATE LAW

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

1,000,000.00

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

7/27/15

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

_____ District of _____

Plaintiff(s)

v.

Defendant(s)

)
)
)
)
)
)
)
)
)
)
)

Civil Action No. _____

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____ , a person of suitable age and discretion who resides there,
 on *(date)* _____ , and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____ , who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____ .

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: