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9 Attorneys for Plaintiffs
10 LATISHA NIXON as Successor in Interest of
11 GEMMEL MOORE, Deceased; and LATISHA
12 NIXON, Individually

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

15 LATISHA NIXON as Successor in Interest
16 of GEMMEL MOORE, Deceased; and
17 LATISHA NIXON, Individually,

18 Plaintiff.

19 v.

20 EDWARD BUCK; LOS ANGELES
21 COUNTY; JACKIE LACEY, as Los
22 Angeles County District Attorney; CRAIG
23 HUM, as Los Angeles County Assistant
24 Head Deputy District Attorney; and DOES
25 1 through 20, inclusive,

26 Defendant.

CASE NO.:

COMPLAINT FOR DAMAGES

1. WRONGFUL DEATH & SURVIVAL ACTION
2. SEXUAL BATTERY
3. ASSAULT
4. BATTERY
5. HATE VIOLENCE
6. DRUG DEALER LIABILITY
7. NEGLIGENCE *PER SE*
8. NEGLIGENCE (PREMISES LIABILITY)
9. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
10. VIOLATION OF CIVIL RIGHTS (42 U.S.C. § 1983)
11. VIOLATION OF CIVIL RIGHTS (42 U.S.C. § 1985 (3))'

Complaint Filed:

DEMAND FOR JURY TRIAL

1 LATISHA NIXON, Individually and as Successor in Interest of GEMMEL MOORE,
2 Deceased, complains of EDWARD BUCK, LOS ANGELES COUNTY, JACKIE LACEY,
3 CRAIG HUM, and DOES 1 through 20, inclusive (hereafter collectively “Defendants”), and
4 brings this combined Survival and Wrongful Death Action and Civil Rights Complaint, and as
5 for her claims and causes of action alleges as follows:

6 **INTRODUCTION**

7 1. LATISHA NIXON’S son, GEMMEL MOORE, was a young Black man whose
8 life was abruptly and tragically cut short on July 27, 2017 when he died after being injected
9 with a lethal dose of crystal methamphetamine at the hands of EDWARD BUCK, a wealthy
10 older white man who has a well-documented history of isolating Black men for predatory sexual
11 encounters during which he injects them with crystal methamphetamine in the confines of a
12 drug den in his West Hollywood apartment.

13 2. Even after a second Black man’s dead body was recovered from EDWARD
14 BUCK’s apartment on January 7, 2019, LOS ANGELES COUNTY District Attorney JACKIE
15 LACEY and Assistant Head Deputy District Attorney CRAIG HUM have refused to file
16 criminal narcotics and/or homicide charges against EDWARD BUCK, because he is a white
17 man who has donated generously and consistently to elected members of LOS ANGELES
18 COUNTY.

19 **PARTIES**

20 3. Plaintiff LATISHA NIXON (hereafter “Ms. Nixon” or “Plaintiff”) is, and at all
21 times herein mentioned was, a citizen and resident of Harris County in the State of Texas. Ms.
22 Nixon is the surviving parent of GEMMEL MOORE (hereafter “Mr. Moore” or “Decedent”),
23 now deceased.

24 4. Ms. Nixon is the Successor in Interest of Mr. Moore, Deceased, and is entitled to
25 bring this Survival Action pursuant to section 377.30 of the California Code of Civil Procedure
26 because there is no personal representative of the Estate of Mr. Moore. Ms. Nixon has fully
27 complied with section 377.32 of the California Code of Civil Procedure by filing with this
28 Complaint the requisite declaration, executed by Ms. Nixon under penalty of perjury.

FACTUAL ALLEGATIONS

12. Mr. Buck is a 65-year old white man who has contributed more than \$50,000 to the election campaigns and legal defense funds of numerous Los Angeles County and City government officials and candidates since 2008.¹ Including federal and state-level officials and candidates, Mr. Buck has contributed in excess of \$500,000 since 2007.

13. Throughout much of the early half of 2017, Mr. Moore, who was 26-years old, lived with his mother, Ms. Nixon, and his siblings in Harris County, Texas. Mr. Moore had a loving relationship with his mother and siblings, and his friends described him as a good man with a kind and generous heart. Like most young people his age, Mr. Moore had hopes and dreams for his future.

14. On or around July 27, 2017, Mr. Buck purchased for Mr. Moore an airplane ticket for a flight departing from Houston, Texas and arriving in Los Angeles, California that same evening. Upon landing at Los Angeles International Airport on July 27, 2017, Mr. Moore went directly to Mr. Buck's West Hollywood apartment.

¹ According to mandatory public disclosures of campaign contribution, Mr. Buck made the following donations and contributions: \$100 to Ms. Lacey for District Attorney on March 3, 2012; \$1,400 to Eric Garcetti for Mayor on November 3, 2016; \$2,600 to Mike Feuer for City Attorney on September 4, 2011, March 23, 2012, and April 2, 2013; \$2,000 Mike Feuer's Legal Defense Fund on April 7, 2013 and October 14, 2015; \$2,000 to Mike Feuer's Attorney Officeholder Account on May 13, 2015; \$1,400 to the Re-Elect Mike Feuer for City Attorney campaign on May 13, 2015; \$2,600 to Ron Galperin for City Controller on March 5, 2014 and May 21, 2014; \$1,000 to Ron Galperin's Controller Officeholder Account on October 13, 2014; \$1,400 to Ron Galperin for City Controller on December 31, 2015; \$700 to Bob Blumenfield for City Council on September 25, 2012; \$700 to Bob Blumenfield's City Council Officeholder Account on December 7, 2015; \$700 to Bob Blumenfield for City Council on December 7, 2015; \$500 to Tony Cardenas for City Council on February 8, 2011; \$1,400 to Cedillo for City Council on February 27, 2013 and May 20, 2013; \$500 to Paul Koretz for City Council on August 20, 2008; \$1,000 to Paul Koretz's Officeholder Account on April 29, 2011 and December 17, 2014; \$700 to Paul Koretz for City Council on June 30, 2016; \$1000 to Krekorian for City Council on November 19, 2009 and December 2, 2009; \$500 to Krekorian for City Council on June 24, 2011; \$700 to Krekorian for City Council on February 26, 2015; \$1,400 to Mitch O'Farrell for City Council on February 17, 2013 and April 2, 2013; \$700 to Mitch O'Farrell's Officeholder Account on September 30, 2015; \$1,400 to Mitch O'Farrell's Legal Defense Fund on March 23, 2016; \$700 to Mitch O'Farrell for City Council on September 30, 2015; \$9,500 to Jeffrey Prang for County Accessor on November 1, 2013, June 13, 2014, June 18, 2014, and June 26, 2014; \$13,000 to John Duran for County Supervisor on January 6, 2014, February 11, 2014, April 21, 2014, and May 17, 2014; \$1,000 to Scott Svonkin for Los Angeles Community College District on February 15, 2015; \$500 to Sydney Kamlager for Los Angeles Community College District on February 7, 2015; and \$500 to Scott Houston for West Basin Municipal Water District.

1 15. Within hours after he arrived at Mr. Buck's West Hollywood apartment on July
2 27, 2017, Mr. Moore was dead. According to the official autopsy report describing Mr. Buck's
3 apartment where Mr. Moore's lifeless body was recovered, the apartment was littered with
4 multiple syringes with brown residue, a scale, several lighters and torches, a straw with white
5 residue, glass pipes with white residue and burn marks, plastic bags with white powdery residue
6 and a clear plastic bag containing a crystal-like substance.

7 16. Mr. Buck had previously solicited sex from Mr. Moore on numerous occasions.
8 During previous encounters, Mr. Buck would insist upon injecting Mr. Moore with crystal
9 methamphetamine. Before encountering Mr. Buck, Mr. Moore had never used crystal
10 methamphetamine. According to Mr. Moore in his journal, Mr. Buck introduced Mr. Moore to
11 crystal methamphetamine, administering to Mr. Moore his first and extremely painful injection.
12 After injecting Mr. Moore with crystal methamphetamine, Mr. Buck required Mr. Moore to
13 view hardcore gay male pornography, which played loudly on a large flatscreen television set
14 situated in Mr. Buck's living room. Mr. Buck further required Mr. Moore to masturbate and
15 engage in other autoerotic sex acts for Mr. Buck's sexual gratification and pleasure. Reflecting
16 on his encounters with Mr. Buck, Mr. Moore wrote in his final journal entry, dated December 3,
17 2016, "If it didn't hurt so bad, I'd kill myself, but I'll let Ed Buck do it for now."

18 17. Mr. Buck was neither detained, arrested, nor charged in connection with the
19 discovery of narcotics, paraphernalia, or Mr. Moore's dead body in Mr. Buck's West
20 Hollywood apartment.

21 18. On or around July 31, 2017, the County Department of Coroner preliminarily
22 concluded that Mr. Moore's death was caused by an accidental methamphetamine overdose.

23 19. On or around August 15, 2017, approximately 19 days after Mr. Moore's body
24 was discovered in Mr. Buck's profusely drug littered apartment, the County Sheriff's
25 Department launched a homicide investigation into Mr. Moore's death as a result of community
26 pressure.

27 20. On or around September 13, 2017, the County Sheriff's Department began
28 conducting interviews with other Black men whose testimonies about their own encounters with

1 Mr. Buck corroborated Mr. Moore's own descriptions of past encounters with Mr. Buck. Each
2 of these young Black men, many of whom were strangers to one another, independently
3 described their first-hand experiences of being forcibly injected with crystal methamphetamine
4 by Mr. Buck, whom they alleged had a predatory and injurious system of soliciting Black men
5 and watching them cling to life while battling symptoms of methamphetamine toxicity after he
6 intravenously administered large doses of the drug to them.

7 21. On or around July 26, 2018, Los Angeles County District Attorney Jackie Lacey,
8 assisted in her investigation by Assistant Head Deputy District Attorney Craig Hum, declined to
9 file criminal charges against Mr. Buck.

10 22. On or around January 7, 2019, the lifeless body of a second Black man, Timothy
11 Dean, was recovered from Mr. Buck's West Hollywood apartment – the same apartment in
12 which Mr. Moore died less than 18 months earlier.

13 23. Mr. Buck was neither detained, arrested, nor charged in connection with the
14 discovery of Mr. Dean's dead body in Mr. Buck's West Hollywood apartment.

15 **FIRST CAUSE OF ACTION: WRONGFUL DEATH & SURVIVAL DAMAGES**

16 **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

17 24. Ms. Nixon restates, as though fully set forth herein, the allegations contained in
18 each of the paragraphs above.

19 25. Prior to Mr. Moore's death, Mr. Moore was living in Harris County, Texas with
20 Ms. Nixon and the rest of his family. Mr. Moore was a dutiful and loving son to Ms. Nixon and
21 brother to Ms. Nixon's other children, his siblings.

22 26. As described herein on information and belief, Ms. Nixon alleges that on or
23 about July 27, 2017, Mr. Buck injected Mr. Moore with a lethal dose of crystal
24 methamphetamine.

25 27. As a direct and proximate result of Mr. Buck's wrongful conduct, Mr. Moore
26 died and his heir, Ms. Nixon, has been deprived of his care, society, comfort, attention, services
27 and support to their general damages in an amount exceeding the Superior Court's jurisdictional
28 minimum according to proof at trial. As a direct and proximate result of Mr. Buck's wrongful

1 conduct, Ms. Nixon has incurred funeral and burial expenses and other special damages
2 according to proof at trial.

3 28. As a direct and proximate result of Mr. Buck's wrongful conduct, Mr. Moore
4 was forced to endure severe mental and physical anguish and fear of impending death and he
5 ultimately suffered severe physical injuries which caused his death. As a result of the
6 foregoing, Ms. Nixon, as Successor in Interest of Mr. Moore, hereby asserts survivor's claims
7 on behalf of Mr. Moore, Deceased, pursuant to Sections 377.10, 377.20, 377.30, *et seq.*, of the
8 Code of Civil Procedure, and based upon all other applicable statutes and case law and succeed
9 to the Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth and Eleveneth Causes
10 of Action, all of which might have been brought by Mr. Moore, Deceased:

11 **SECOND CAUSE OF ACTION: SEXUAL BATTERY**

12 **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

13 29. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, restates and
14 incorporates by reference, as though fully set forth herein, the allegations contained in each of
15 the paragraphs above.

16 30. Cal. Civ. Code Section 1708.5(a) provides: "A person commits a sexual battery
17 who does any of the following: (1) Acts with the intent to cause a harmful or offensive contact
18 with an intimate part of another, and a sexually offensive contact with that person directly or
19 indirectly results; (2) Acts with the intent to cause a harmful or offensive contact with another
20 by use of his or her intimate part, and a sexually offensive contact with that person directly or
21 indirectly results; (3) Acts to cause an imminent apprehension of the conduct described in
22 paragraph (1) or (2), and a sexually offensive contact with that person directly or indirectly
23 results."

24 31. Mr. Buck is a "person" under section 1708.5 of the Civil Code.

25 32. Mr. Buck intended to cause harmful and offensive sexual contact with Mr.
26 Moore and a sexually offensive contact with Mr. Moore resulted, either directly or indirectly,
27 when Mr. Buck distributed or furnished crystal methamphetamine to Mr. Moore and then
28 forcibly and repeatedly injected Mr. Moore with crystal methamphetamine while requiring Mr.

1 Moore to view hardcore pornographic films, masturbate and perform other various sexually
2 graphic acts.

3 33. At no time did Mr. Moore consent, either expressly or impliedly, to Mr. Buck's
4 acts.

5 34. Mr. Moore lacked the mental capacity to consent due to his being intoxicated and
6 mentally impaired as a result of being forcibly injected with crystal methamphetamine by Mr.
7 Buck.

8 35. Mr. Moore was harmed and offended by Mr. Buck's conduct, as any reasonable
9 person in his situation would have been.

10 36. As a direct and proximate result of Mr. Buck's actions, Mr. Moore suffered
11 special and general damages, including physical pain, mental suffering, loss of enjoyment of
12 life, anxiety, embarrassment, humiliation, and severe emotional distress, all in an amount
13 exceeding the Superior Court's jurisdictional minimum according to proof at trial.

14 Additionally, Mr. Moore suffered a loss of earnings and other economic opportunities.

15 37. Mr. Buck's conduct was malicious and oppressive, and done with a conscious
16 disregard of Mr. Moore's rights. Mr. Buck also acted with the knowledge of or with reckless
17 disregard for the fact that his conduct was certain to cause injury and/or humiliation to Mr.
18 Moore. Ms. Nixon is further informed and believes that Mr. Buck intended to cause fear,
19 physical injury and/or pain and suffering to Mr. Moore. Ms. Nixon, as Successor in Interest of
20 Mr. Moore, Deceased, is entitled to recover punitive and exemplary damages from Mr. Buck
21 according to proof at trial.

22 **THIRD CAUSE OF ACTION: ASSAULT**

23 **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

24 38. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, restates and
25 incorporates by reference, as though fully set forth herein, the allegations contained in each of
26 the paragraphs above.

27 39. Mr. Buck intended to cause Mr. Moore apprehension of an imminent harmful
28 and offensive contact with his person when Mr. Buck distributed or furnished crystal

1 methamphetamine to Mr. Moore and then forcibly and repeatedly injected Mr. Moore with
2 crystal methamphetamine while requiring Mr. Moore to view hardcore pornographic films,
3 masturbate and perform other various sexually graphic acts.

4 40. As a result of Mr. Buck's acts, Mr. Moore was, in fact, placed in great
5 apprehension of imminent harmful and offensive contact with his person.

6 41. At no time did Mr. Moore consent, either expressly or impliedly, to Mr. Buck's
7 acts.

8 42. Mr. Moore lacked the mental capacity to consent due to his being intoxicated and
9 mentally impaired as a result of being forcibly injected with crystal methamphetamine by Mr.
10 Buck.

11 43. In performing the acts described above, Mr. Buck acted with the intent to make
12 contact with Mr. Moore's person.

13 44. Mr. Buck's conduct as described above, caused Mr. Moore to be apprehensive
14 that Mr. Buck would subject Mr. Moore to further intentional invasions of his right to be free
15 from offensive and harmful contact and demonstrated that at all material times, Mr. Buck had a
16 present ability to subject Mr. Moore to an intentional offensive and harmful touching.

17 45. As a direct and proximate result of Mr. Buck's actions, Mr. Moore suffered
18 special and general damages, including physical pain, mental suffering, loss of enjoyment of
19 life, anxiety, embarrassment, humiliation, and severe emotional distress, all in an amount
20 exceeding the Superior Court's jurisdictional minimum according to proof at trial.
21 Additionally, Mr. Moore suffered a loss of earnings and other economic opportunities.

22 46. Mr. Buck's conduct was malicious and oppressive, and done with a conscious
23 disregard of Mr. Moore's rights. Mr. Buck also acted with the knowledge of or with reckless
24 disregard for the fact that his conduct was certain to cause injury and/or humiliation to Mr.
25 Moore. Ms. Nixon is further informed and believes that Mr. Buck intended to cause fear,
26 physical injury and/or pain and suffering to Mr. Moore. Ms. Nixon, as Successor in Interest of
27 Mr. Moore, Deceased, is entitled to recover punitive and exemplary damages from Mr. Buck
28 according to proof at trial.

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5 **FOURTH CAUSE OF ACTION: BATTERY**

6 **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

7 47. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, restates and
8 incorporates by reference, as though fully set forth herein, the allegations contained in each of
9 the paragraphs above.

10 48. When Mr. Buck forcibly and repeatedly injected Mr. Moore with crystal
11 methamphetamine, Mr. Buck acted with the intent to make a harmful and offensive contact with
12 Mr. Moore's person.

13 49. When Mr. Buck forcibly and repeatedly injected Mr. Moore with crystal
14 methamphetamine, Mr. Buck did, in fact, bring himself into offensive and unwelcome contact
15 with Mr. Moore's person.

16 50. Mr. Moore was harmed and offended by Mr. Buck's conduct, as any reasonable
17 person in his situation would have been.

18 51. At no time did Mr. Moore consent, either expressly or impliedly, to Mr. Buck's
19 acts.

20 52. Mr. Moore lacked the mental capacity to consent due to his being intoxicated as
21 a result of being forcibly injected with crystal methamphetamine by Mr. Buck.

22 53. As a direct and proximate result of Mr. Buck's actions, Mr. Moore suffered
23 special and general damages, including physical pain, mental suffering, loss of enjoyment of
24 life, anxiety, embarrassment, humiliation, and severe emotional distress, all in an amount
25 exceeding the Superior Court's jurisdictional minimum according to proof at trial.

26 Additionally, Mr. Moore suffered a loss of earnings and other economic opportunities.
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1 54. Mr. Buck's conduct was malicious and oppressive, and done with a conscious
2 disregard of Mr. Moore's rights. Mr. Buck also acted with the knowledge of or with reckless
3 disregard for the fact that his conduct was certain to cause injury and/or humiliation to Mr.
4 Moore. Ms. Nixon is further informed and believes that Mr. Buck intended to cause fear,
5 physical injury and/or pain and suffering to Mr. Moore. Ms. Nixon, as Successor in Interest of
6 Mr. Moore, Deceased, is entitled to recover punitive and exemplary damages from Mr. Buck
7 according to proof at trial.

8 **FIFTH CAUSE OF ACTION: HATE VIOLENCE**

9 **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

10 55. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, restates and
11 incorporates by reference, as though fully set forth herein, the allegations contained in each of
12 the paragraphs above.

13 56. Cal. Civ. Code Section 51.7 (a) states "all persons within the jurisdiction of this
14 state have the right to be free from any violence, or intimidation by threat of violence,
15 committed against their persons or property because of political affiliation, or on account of any
16 characteristic listed or defined in subdivision (b) or (e) of Section 51 ... or because another
17 person perceives them to have one or more of those characteristics."

18 57. At all times mentioned herein, Mr. Moore had the right to be free from any
19 violence, or intimidation by threat of violence, committed against his person on account of his
20 race.

21 58. Mr. Buck subjected Mr. Moore to violence, and/or intimidation by threats of
22 violence, against his person on account of his race and/or acted to deny Mr. Moore his right to
23 be free from any violence, or intimidation by threat of violence, committed against his person
24 on the account of his race.

25 59. In doing so, Mr. Buck violated Mr. Moore's civil rights, as set forth in the Ralph
26 Civil Rights Act, which is codified in Cal. Civ. Code § 51.7.

27 60. As a direct and proximate result of Mr. Buck's actions, Mr. Moore suffered
28 special and general damages, including physical pain, mental suffering, loss of enjoyment of

1 life, anxiety, embarrassment, humiliation, and severe emotional distress, all in an amount
2 exceeding the Superior Court's jurisdictional minimum according to proof at trial.

3 Additionally, Mr. Moore suffered a loss of earnings and other economic opportunities.

4 61. Mr. Buck's conduct was malicious and oppressive, and done with a conscious
5 disregard of Mr. Moore's rights. Mr. Buck also acted with the knowledge of or with reckless
6 disregard for the fact that his conduct was certain to cause injury and/or humiliation to Mr.
7 Moore. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, is further informed and
8 believes that Mr. Buck intended to cause fear, physical injury and/or pain and suffering to Mr.
9 Moore. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, is entitled to recover
10 punitive and exemplary damages from Mr. Buck according to proof at trial.

11 62. In addition to and/or in lieu of Ms. Nixon's, as Successor in Interest of Mr.
12 Moore, Deceased, election, Ms. Nixon is entitled to receive and hereby seeks statutory damages
13 pursuant to Cal. Civ. Code § 52(b), including actual and exemplary damages.

14 63. Pursuant to Cal. Civ. Code § 52(b)(3), Ms. Nixon, as Successor in Interest of Mr.
15 Moore, Deceased, has incurred, and will continue to incur, attorneys' fees in the prosecution of
16 this action and therefore demands such reasonable attorneys' fees and costs as set by the Court.

17 **SIXTH CAUSE OF ACTION: DRUG DEALER LIABILITY**

18 **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

19 64. Ms. Nixon, in her individual capacity and as Successor in Interest of Mr. Moore,
20 Deceased, restates and incorporates by reference, as though fully set forth herein, the allegations
21 contained in each of the paragraphs above.

22 65. The California Drug Dealer Liability Act, codified as Health and Safety Code
23 sections 11700, *et seq.*, was enacted to provide a civil remedy for damages to persons injured as
24 a result of the use of an illegal controlled substance.

25 66. Health and Safety Code section 11705, subdivision (a)(1), which is part of the
26 Drug Dealer Liability Act, provides that a "parent, legal guardian, child, spouse, or sibling" of
27 the individual controlled substance user is entitled to bring an action for damages caused by an
28 individual's use of an illegal controlled substance.

1 67. Health and Safety Code section 11705, subdivision (b)(1) states that a person
2 entitled to bring an action under the Drug Dealer Liability Act may seek damages from a person
3 who sold, administered, or furnished an illegal controlled substance to the individual user of the
4 illegal controlled substance, as well as from a person who knowingly participated in the
5 marketing of illegal controlled substances.

6 68. As described above, Mr. Buck wrongfully and illegally supplied, marketed and
7 distributed crystal methamphetamine to Mr. Moore on or about July 27, 2017. On or about July
8 27, 2017, Mr. Buck intravenously administered crystal methamphetamine to Mr. Moore, who
9 shortly thereafter died as a result.

10 69. Mr. Moore's death was tragic and easily avoidable. It has had a debilitating and
11 devastating effect on his friends and family, not least on Ms. Nixon.

12 70. Health and Safety Code section 11705, subdivision (d), which is part of the Drug
13 Dealer Liability Act, entitles Plaintiff to recover the following: "(1) Economic damages,
14 including, but not limited to, the cost of treatment and rehabilitation, medical expenses, loss of
15 economic or educational potential, loss of productivity, absenteeism, support expenses,
16 accidents or injury, and any other pecuniary loss proximately caused by the use of an illegal
17 controlled substance. (2) Noneconomic damages, including, but not limited to, physical and
18 emotional pain, suffering, physical impairment, loss of companionship, services and
19 consortium, and other nonpecuniary losses proximately caused by an individual's use of an
20 illegal controlled substance. (3) Exemplary damages. (4) Reasonable attorney fees. (5) Costs
21 of suit, including, but not limited to, reasonable expenses for expert testimony. Accordingly, by
22 way of this action, Ms. Nixon, in her individual capacity and as Successor in Interest of Mr.
23 Moore, Deceased, seeks all such available damages in an amount exceeding the Superior
24 Court's jurisdictional minimum according to proof at trial.

25 71. Mr. Buck's conduct was malicious and oppressive, and done with a conscious
26 disregard of Mr. Moore's rights. Mr. Buck also acted with the knowledge of or with reckless
27 disregard for the fact that his conduct was certain to cause injury and/or humiliation to Mr.
28 Moore. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, is further informed and

believes that Mr. Buck intended to cause fear, physical injury and/or pain and suffering to Mr. Moore. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, is entitled to recover punitive and exemplary damages from Mr. Buck according to proof at trial.

SEVENTH CAUSE OF ACTION: NEGLIGENCE PER SE

(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)

72. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, restates and incorporates by reference, as though fully set forth herein, the allegations contained in each of the paragraphs above.

73. Mr. Buck owed Mr. Moore a duty of care, as set forth herein.

74. At all relevant times, Mr. Buck was subject to The California Drug Dealer Liability Act, codified as Health and Safety Code sections 11700, *et seq.*, which is a health and safety law pertaining to the significant health hazards posed by the consumption of illegal controlled substances, like crystal methamphetamine. The Drug Dealer Liability Act was intended to preserve life and prevent bodily injury to individual users of illegal controlled substances, like crystal methamphetamine, by imposing civil liability on a defendant who manufacturers, distributes, or furnishes an illegal controlled substance to an individual who is subsequently injured as a direct and proximate result of consuming the same. The Drug Dealer Liability Act was further intended to promote the health of those who use illegal controlled substances by providing such individuals with a mechanism for paying the substantial costs of medical rehabilitation by obtaining monetary damages from a defendant who manufactures, distributes, or furnishes an illegal controlled substance.

75. Mr. Moore is a member of a class (individuals who consume illegal controlled substances) for whose benefit the Drug Dealer Liability Act was passed.

76. Mr. Buck violated the Drug Dealer Liability Act and breached that duty of care that was owed to Mr. Moore, as described herein, when, after distributing or furnishing crystal methamphetamine to Mr. Moore, Mr. Buck then forcibly and repeatedly injected Mr. Moore with crystal methamphetamine while requiring Mr. Moore to view hardcore pornographic films, masturbate and perform other various sexually graphic acts.

1 77. As a direct and proximate result of Mr. Buck's actions, Mr. Moore suffered the
2 same type of harm that the Drug Dealer Liability Act was intended to prevent, resulting in "(1)
3 Economic damages, including, but not limited to, the cost of treatment and rehabilitation,
4 medical expenses, loss of economic or educational potential, loss of productivity, absenteeism,
5 support expenses, accidents or injury, and any other pecuniary loss proximately caused by the
6 use of an illegal controlled substance. (2) Noneconomic damages, including, but not limited to,
7 physical and emotional pain, suffering, physical impairment, loss of companionship, services
8 and consortium, and other nonpecuniary losses proximately caused by an individual's use of an
9 illegal controlled substance" all in an amount exceeding the Superior Court's jurisdictional
10 minimum according to proof at trial. *Cal. Health & Safety Code* § 11705, subd. (d).

11 78. Mr. Buck's conduct was malicious and oppressive, and done with a conscious
12 disregard of Mr. Moore's rights. Mr. Buck also acted with the knowledge of or with reckless
13 disregard for the fact that his conduct was certain to cause injury and/or humiliation to Mr.
14 Moore. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, is further informed and
15 believes that Mr. Buck intended to cause fear, physical injury and/or pain and suffering to Mr.
16 Moore. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, is entitled to recover
17 punitive and exemplary damages from Mr. Buck according to proof at trial.

18 **EIGHTH CAUSE OF ACTION: NEGLIGENCE (PREMISES LIABILITY)**

19 **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

20 79. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, restates and
21 incorporates by reference, as though fully set forth herein, the allegations contained in each of
22 the paragraphs above.

23 80. In the alternative, Ms. Nixon alleges that Mr. Buck was negligent in the use
24 and/or maintenance of the property on which Mr. Moore was harmed.

25 81. Mr. Buck occupied or controlled the property on which Mr. Moore was harmed.
26 As the occupier or controller of the property, Mr. Buck was under a duty to manage and act
27 reasonably to control his property and guests to prevent injury from, among other things,
28

1 foreseeable sexual battery, battery, assault, and injuries resulting from the distribution,
2 manufacturing, or furnishing of illegal controlled substances to Mr. Moore.

3 82. Based on information and belief, as described herein, Ms. Nixon alleges that Mr.
4 Buck has a history of hosting sexual encounters at the property during which he facilitated the
5 distribution, manufacturing or furnishing of illegal controlled substances to his guests, into
6 whom Mr. Buck forcibly injected crystal methamphetamine. Mr. Buck was aware or should
7 have been aware of the risk of injury to his guests.

8 83. By virtue of the information Mr. Buck knew or should have known as alleged
9 herein, Mr. Buck owed Mr. Moore a duty to prevent the kinds of injuries he sustained.

10 84. Mr. Buck breached that duty of care that was owed to Mr. Moore by his own
11 conduct, as described herein. Among other things, when Mr. Buck forcibly and repeatedly
12 injected Mr. Moore with crystal methamphetamine while requiring Mr. Moore to view hardcore
13 pornographic films, masturbate and perform other various sexually graphic acts, Mr. Buck
14 breached his duty to ensure the safety of guests on his premises, such as Mr. Moore, who, as a
15 result of Mr. Buck's breach of duty, died shortly after being injected with crystal
16 methamphetamine on the living room floor of Mr. Buck's apartment.

17 85. As a direct and proximate result of Mr. Buck's actions, Mr. Moore suffered
18 special and general damages, including physical pain, mental suffering, loss of enjoyment of
19 life, anxiety, embarrassment, humiliation, and severe emotional distress, all in an amount
20 exceeding the Superior Court's jurisdictional minimum according to proof at trial.
21 Additionally, Mr. Moore suffered a loss of earnings and other economic opportunities.

22 86. Mr. Buck's conduct was malicious and oppressive, and done with a conscious
23 disregard of Mr. Moore's rights. Mr. Buck also acted with the knowledge of or with reckless
24 disregard for the fact that his conduct was certain to cause injury and/or humiliation to Mr.
25 Moore. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, is further informed and
26 believes that Mr. Buck intended to cause fear, physical injury and/or pain and suffering to Mr.
27 Moore. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, is entitled to recover
28 punitive and exemplary damages from Mr. Buck according to proof at trial.

1 **NINTH CAUSE OF ACTION: INTENTIONAL INFLICTION OF EMOTIONAL**
2 **DISTRESS**

3 **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

4 87. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, restates and
5 incorporates by reference, as though fully set forth herein, the allegations contained in each of
6 the paragraphs above.

7 88. Mr. Buck knew or should have known that Mr. Moore did not want to be
8 injected with crystal methamphetamine by Mr. Buck. Mr. Buck further knew or should have
9 known that Mr. Moore did not want to be rendered incapacitated and made to view hardcore
10 pornographic films while masturbating and being forced to perform various other sexually
11 graphic acts.

12 89. Mr. Buck's conduct was extreme and outrageous. Mr. Buck acted with reckless
13 disregard for Mr. Moore's rights and feelings, and with deliberate indifference to the certainty
14 that Mr. Moore would suffer emotional distress.

15 90. As a direct and proximate result of Mr. Buck's actions, Mr. Moore suffered and
16 continued to suffer severe mental anguish, humiliation, pain, severe emotional distress and
17 physical distress. The amount of general and special damages suffered by Mr. Moore as a direct
18 and proximate result of Mr. Buck's wrongful actions exceeds the Superior Court's jurisdictional
19 minimum.

20 91. Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, is informed and
21 believes, and based upon such information and belief alleges, that the outrageous conduct of
22 Mr. Buck described above was performed with conscious disregard for Mr. Moore's rights and
23 feelings. As a result, Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, is entitled to
24 punitive or exemplary damages from Mr. Buck in an amount according to proof at trial.

25 **TENTH CAUSE OF ACTION: CIVIL RIGHTS VIOLATION (42 U.S.C. § 1983)**

26 **(Against Defendants LOS ANGELES COUNTY, JACKIE LACEY, individually and as**
27 **Los Angeles County District Attorney, CRAIG HUM, individually and as Los Angeles**
28 **County Assistant Head Deputy District Attorney, and DOES 1 through 20, Inclusive)**

1 92. Ms. Nixon, Individually and as Successor in Interest of Mr. Moore, Deceased,
2 restates and incorporates by reference, as though fully set forth herein, the allegations contained
3 in each of the paragraphs above.

4 93. County is and at all times herein mentioned has been a public entity and an
5 incorporated municipality duly authorized and existing as such in and under the laws of the
6 State of California; and at all times herein mentioned, County possessed the power and
7 authority to adopt policies and prescribe rules, regulations and practices affecting the operation
8 of the Los Angeles County District Attorney's Office and its tactics, methods, practices,
9 customs and usages related to criminal investigations and prosecutions, generally.

10 94. At all times herein mentioned, Ms. Lacey and Mr. Hum were employees acting
11 under the County's direction and control, who knowingly and intentionally promulgated,
12 maintained, applied, enforced and suffered the continuation of policies, customs, practices and
13 usages in violation of the Fourteenth Amendment to the United States Constitution, which
14 customs, policies, practices and usages at all times herein mentioned required and encouraged
15 the bigoted and racially-motivated decision to decline to prosecute white men, including Mr.
16 Buck, for his felonious crimes of narcotics possession and physical violence against Black men,
17 including Mr. Moore.

18 95. County knowingly maintains and permits official *sub-rosa* policies or customs of
19 permitting the occurrence of the kinds of wrongs set forth above, by failing and refusing to
20 impartially prosecute white men, like Mr. Buck, who commit felonious crimes of narcotics
21 possession and physical violence against Black men, including Mr. Moore.

22 96. The unconstitutional policy, practice or custom promulgated, sanctioned or
23 tolerated by County, Ms. Lacey and Mr. Hum include, but are not limited to:

24 (1) County, Ms. Lacey and Mr. Hum had knowledge, since the death of Mr.
25 Moore, of Mr. Buck's commission of felonious crimes of narcotics possession and physical
26 violence against Mr. Moore, and refused to prosecute Mr. Buck because he is white, and
27 because Mr. Moore was Black;

1 (2) County, Ms. Lacey and Mr. Hum had knowledge, prior to and since the
2 death of Mr. Dean, of Mr. Buck's commission of felonious crimes of narcotics possession and
3 physical violence against Mr. Dean and other Black men, and refused to prosecute Mr. Buck
4 because he is white, and because Mr. Moore was Black;

5 (3) County, Ms. Lacey and Mr. Hum had knowledge of similar allegations of
6 Mr. Buck's commission of felonious crimes of narcotics possession and physical violence
7 against other Black men, and refused to prosecute Mr. Buck because he is white, and because
8 his victims are Black.

9 (4) County, Ms. Lacey and Mr. Hum fostered and encouraged an atmosphere
10 of lawlessness, abuse and unconstitutional misconduct, which now represents the
11 unconstitutional policies, practices and customs of the County.

12 97. By reason of the aforesaid policies, customs, practices and usages, Mr. Moore's
13 rights under the Fourteenth Amendment to the United States Constitution were deprived.

14 **ELEVENTH CAUSE OF ACTION: CIVIL RIGHTS VIOLATION (42 U.S.C. § 1985 (3))**

15 **(Against Defendants LOS ANGELES COUNTY, JACKIE LACEY, individually and as**
16 **Los Angeles County District Attorney, CRAIG HUM, individually and as Los Angeles**
17 **County Assistant Head Deputy District Attorney, and DOES 1 through 20, Inclusive)**

18 98. Ms. Nixon, Individually and as Successor in Interest of Mr. Moore, Deceased,
19 restates and incorporates by reference, as though fully set forth herein, the allegations contained
20 in each of the paragraphs above.

21 99. By virtue of the foregoing, Ms. Lacey, Mr. Hum, and Does 1 through 20,
22 Inclusive, conspired for the purpose of depriving Mr. Moore of (a) equal protection of the law;
23 and (b) equal protection and immunities under the law; and for the purpose of preventing and
24 hindering the constituted authorities from giving and securing to Mr. Moore equal protection of
25 the law.

26 100. Ms. Lacey, Mr. Hum, and Does 1 through 20, did and caused to be done, an act
27 or acts in furtherance of the object of the conspiracy, whereby Mr. Moore was deprived of the
28 rights and privileges as set forth above.

101. As a direct proximate result of the foregoing, Ms. Nixon, as Successor in Interest of Mr. Moore, Deceased, has been damaged as described herein and demands and is entitled to general and punitive damages (except as to County) and attorney's fees.

PRAYER FOR RELIEF

WHEREFORE, Ms. Nixon prays for judgment and damages against the Defendants as follows:

1. General damages in an amount to be determined at trial;
2. Past and future medical and related expenses in an amount to be determined at trial;
3. Past and future lost earnings in an amount to be determined at trial;
4. Impairment of earning capacity in an amount to be determined at trial;
5. Punitive damages pursuant to applicable law (except as to County);
6. Reasonable attorneys' fees pursuant to applicable law;
7. Prejudgment and post-judgment interest, including but not limited to, California Civil Code § 3288; and
8. Any other and further relief that the Court considers just and proper.

DEMAND FOR JURY TRIAL

Plaintiff hereby requests a trial by jury.

DATED: February 25, 2019


Hussain Turk, Esq.

Attorney for Plaintiff LATISHA NIXON

DATED: February 25, 2019


Nana Gyamfi, Attorney

Attorney for Plaintiff LATISHA NIXON

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9 Attorneys for Plaintiffs
10 LATISHA NIXON as Successor in Interest of
11 GEMMEL MOORE, Deceased; and LATISHA
12 NIXON, Individually

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
LOS ANGELES COUNTY, CENTRAL DIVISION

13 LATISHA NIXON as Successor in Interest
14 of GEMMEL MOORE, Deceased; and
15 LATISHA NIXON, Individually,
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Plaintiff.

v.

18 EDWARD BUCK, individually; LOS
19 ANGELES COUNTY; JACKIE LACEY,
20 individually and as Los Angeles County
21 District Attorney; CRAIG HUM,
22 individually and as Los Angeles County
23 Deputy District Attorney; and DOES 1
24 through 20, inclusive,
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26
27
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Defendant.

**DECLARATION OF LATISHA NIXON
PURSUANT TO SECTION 377.32 OF
THE CODE OF CIVIL PROCEDURE**

I, LATISHA NIXON, declare as follows:

1. I am over the age of 18 years. I have personal knowledge of the facts contained in this declaration, and if called as a witness I could and would testify competently to the truth of the facts stated herein.

2. I am the mother of GEMMEL ARTAE MOORE, who died on July 27, 2017 at Los Angeles, California.

3. No proceeding is now pending in the State of California for the Estate of GEMMEL ARTAE MOORE.

4. I am the only Successors in Interest to GEMMEL ARTAE MOORE, as defined in Section 377.11 of the Code of Civil Procedure.

5. No other person has a superior right to commence the above-entitled proceeding or to be substituted for GEMMEL ARTAE MOORE in the above-entitled proceeding.

6. A certified copy of the death certificate for GEMMEL ARTAE MOORE is attached hereto as Exhibit "A" and incorporated herein by reference.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed on Feb. 26, 2019 at Los Angeles, California.


LATISHA NIXON

EXHIBIT A

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC HEALTH

3052017164642

CERTIFICATE OF DEATH

3201719036484

STATE FILE NUMBER		STATE OF CALIFORNIA USE BLACK INK ONLY IF NO ERASURES, WHITEOUTS OR ALTERATIONS VS-1 (REV. 3/06)		LOCAL REGISTRATION NUMBER	
1. NAME OF DECEDENT - FIRST (Given) GEMMEL		2. MIDDLE ARTAE		3. LAST (Family) MOORE	
AKA, ALSO KNOWN AS - Include full AKA (FIRST, MIDDLE, LAST) ---		4. DATE OF BIRTH mm/dd/ccyy 01/14/1991		5. AGE Yrs 26	
9. BIRTH STATE/FOREIGN COUNTRY CA		10. SOCIAL SECURITY NUMBER 611-42-1691		11. EVER IN U.S. ARMED FORCES? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> LINK	
12. MARITAL STATUS/SROP (at Time of Death) NEVER MARRIED		7. DATE OF DEATH mm/dd/ccyy 07/27/2017		8. HOUR (24 Hours) 1922	
13. EDUCATION - Highest Level/Degree (see worksheet on back) HS GRADUATE		14/15. WAS DECEDENT HISPANIC/LATINO/ASIAN/PAKISTANI? (if yes, see worksheet on back) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		16. DECEDENT'S RACE - Up to 3 races may be listed (see worksheet on back) BLACK	
17. USUAL OCCUPATION - Type of work for most of life. DO NOT USE RETIRED CLERK		18. KIND OF BUSINESS OR INDUSTRY (e.g., grocery store, road construction, employment agency, etc.) RESTAURANT		19. YEARS IN OCCUPATION 1	
20. DECEDENT'S RESIDENCE (Street and number, or location) REDACTED					
21. CITY REDACTED		22. COUNTY/PROVINCE REDACTED		24. YEARS IN COUNTY 10	
25. STATE/FOREIGN COUNTRY TX		26. INFORMANT'S NAME, RELATIONSHIP LATISHA NIXON, MOTHER			
27. NAME OF SURVIVING SPOUSE/SROP - FIRST ---		28. MIDDLE ---		29. LAST (BIRTH NAME) ---	
30. LAST (BIRTH NAME) ---		31. NAME OF FATHER/PARENT - FIRST JERMELL		32. MIDDLE ---	
33. NAME OF MOTHER/PARENT - FIRST LATISHA		34. MIDDLE ---		35. LAST (BIRTH NAME) NIXON	
36. MIDDLE ---		37. LAST (BIRTH NAME) NIXON		38. BIRTH STATE CA	
39. DISPOSITION DATE mm/dd/ccyy 08/19/2017		40. PLACE OF FINAL DISPOSITION REDACTED			
41. TYPE OF DISPOSITION(S) CR/TR/RES		42. SIGNATURE OF EMBALMER CHRISTOPHER BROWN		43. LICENSE NUMBER EMB8182	
44. NAME OF FUNERAL ESTABLISHMENT SERENITY FAMILY MORTUARY		45. LICENSE NUMBER FD2311		46. SIGNATURE OF LOCAL REGISTRAR JEFFREY GUNZENHAUSER, MD	
47. DATE mm/dd/ccyy 08/16/2017		48. DATE mm/dd/ccyy 08/16/2017			
101. PLACE OF DEATH RESIDENCE		102. IF HOSPITAL, SPECIFY ONE <input type="checkbox"/> IP <input type="checkbox"/> ER/OP <input type="checkbox"/> DCA <input type="checkbox"/> Home		103. IF OTHER THAN HOSPITAL, SPECIFY ONE <input type="checkbox"/> Nursing Home/LTC <input type="checkbox"/> Decedent's Home <input checked="" type="checkbox"/> Other	
104. COUNTY LOS ANGELES		105. FACILITY ADDRESS OR LOCATION WHERE FOUND (Street and number, or location) 1234 NORTH LAUREL AVENUE APT. #17		106. CITY WEST HOLLYWOOD	
107. CAUSE OF DEATH Enter the chain of events - diseases, injuries, or complications - that directly caused death. DO NOT list non-terminal events such as cardiac arrest, respiratory arrest, or ventricular fibrillation without showing the etiology. DO NOT ABBREVIATE. METHAMPHETAMINE USE		Time Interval Between Onset and Death (AT) MINS		108. DEATH REPORTED TO CORONER? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
109. BIOPSY PERFORMED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		110. AUTOPSY PERFORMED? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		111. USED IN DETERMINING CAUSE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
112. OTHER SIGNIFICANT CONDITIONS CONTRIBUTING TO DEATH BUT NOT RESULTING IN THE UNDERLYING CAUSE GIVEN IN 107 NONE					
113. WAS OPERATION PERFORMED FOR ANY CONDITION IN ITEM 107 OR 112? (If yes, list type of operation and date) NO					
114. I CERTIFY THAT TO THE BEST OF MY KNOWLEDGE DEATH OCCURRED AT THE HOUR, DATE, AND PLACE STATED FROM THE CAUSES STATED. Decedent Attended Since: (A) mm/dd/ccyy (B) mm/dd/ccyy		115. SIGNATURE AND TITLE OF CERTIFIER EVONNE D REED		116. LICENSE NUMBER EVONNE D REED, DEPUTY CORONER	
117. DATE mm/dd/ccyy 08/16/2017		118. TYPE ATTENDING PHYSICIAN'S NAME, MAILING ADDRESS, ZIP CODE EVONNE D REED, DEPUTY CORONER			
119. I CERTIFY THAT IN MY OPINION DEATH OCCURRED AT THE HOUR, DATE, AND PLACE STATED FROM THE CAUSES STATED. MANNER OF DEATH: <input type="checkbox"/> Natural <input checked="" type="checkbox"/> Accident <input type="checkbox"/> Homicide <input type="checkbox"/> Suicide <input type="checkbox"/> Pending Investigation <input type="checkbox"/> Could not be determined		120. INJURED AT WORK? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> LINK		121. INJURY DATE mm/dd/ccyy 07/27/2017	
122. HOUR (24 Hours) 1700		123. PLACE OF INJURY (e.g., home, construction site, wooded area, etc.) RESIDENCE			
124. DESCRIBE HOW INJURY OCCURRED (Events which resulted in injury) DRUG INTAKE					
125. LOCATION OF INJURY (Street and number, or location, and city, and zip) 1234 NORTH LAUREL AVENUE APT. #17, WEST HOLLYWOOD, CA 90046					
126. SIGNATURE OF CORONER / DEPUTY CORONER EVONNE D REED		127. DATE mm/dd/ccyy 08/16/2017		128. TYPE NAME, TITLE OF CORONER / DEPUTY CORONER EVONNE D REED, DEPUTY CORONER	
STATE REGISTRAR		A B C D E		FAX AUTH.#	
CENSUS TRACT		010001003636671*			

CERTIFIED COPY OF VITAL RECORD

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

This is a true certified copy of the record filed in the County of Los Angeles Department of Public Health if it bears the Registrar's signature in purple ink.



Health Officer and Registrar

DATE ISSUED

MAR 20 2018

This copy is not valid unless prepared on an engraved border, displaying the date, seal and signature of the Registrar.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE

