

FILED

1 PETER BIBRING (SBN 223981)  
 Email: pbibring@aclu-sc.org  
 2 MARK ROSENBAUM (SBN 59940)  
 Email: mrosenbaum@aclu-sc.org  
 3 PETER J. ELIASBERG (SBN 189110)  
 Email: peliasberg@aclu-sc.org  
 4 ACLU FOUNDATION  
 OF SOUTHERN CALIFORNIA  
 5 1313 West Eighth Street  
 Los Angeles, CA 90017  
 6 Telephone: (213) 977-9500  
 7 Facsimile: (213) 977-5297

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 CLERK, U.S. DISTRICT COURT  
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 RIVERSIDE

8 STACY SHARTIN (SBN 58281)  
 Email: sshartin@seyfarth.com  
 9 RISHI PURI (SBN 252718)  
 Email: rpuri@seyfarth.com  
 10 SEYFARTH SHAW LLP  
 2029 Century Park East, Suite 3300  
 11 Los Angeles, California 90067-3063  
 Telephone: (310) 277-7200  
 12 Facsimile: (310) 201-5219

13  
 14 **UNITED STATES DISTRICT COURT**  
 15 **CENTRAL DISTRICT OF CALIFORNIA**  
 16 **EASTERN DIVISION**  
 17

18  
 19 KEVON GORDON, RONALD  
 JONES, RAYMOND BARNES,  
 20 QUINCY BROWN

21 Plaintiffs,

22 vs.

23 CITY OF MORENO VALLEY, a  
 Municipal Corporation; COUNTY  
 24 OF RIVERSIDE; RICK HALL,  
 CHIEF OF THE MORENO VALLEY  
 25 POLICE DEPARTMENT, in his  
 official capacity; KRISTY  
 26 UNDERWOOD, EXECUTIVE  
 OFFICER OF THE CALIFORNIA  
 27 BOARD OF BARBERING AND  
 COSMETOLOGY, in her official  
 28 capacity; STAN SNIFF, RIVERSIDE  
 COUNTY SHERIFF, in his official  
 capacity; TONY HEISTERBERG,

Case No. ED CV 09-00688 SGL (SSx)

**FIRST AMENDED COMPLAINT**

**DEMAND FOR JURY TRIAL**

Assigned to: Judge Stephen G. Larson

S) 20

1 DENNIS LONGDYKE, LORI  
2 MILLER, SETH HARTNETT,  
3 ROBERT DUCKETT, MARIO  
4 HERRERA, ERIC BREWER,  
5 ANTHONY JOHNSON,  
6 CHRISTOPHER GASTINGER,  
7 RICHARD HUTSON, JOE BROWN,  
8 XOCHI CARMARGO, ARLENE  
9 BAUBY, and DOES 1-20, in their  
10 individual capacities,

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Defendants.

1 **JURISDICTION AND VENUE**

2 1. This action seeks injunctive relief and damages for a series of raid-  
3 style searches conducted by police in Moreno Valley, in coordination with local  
4 and state inspectors, targeting African American barbershops that housed  
5 legitimate, respected businesses and that served the African American community  
6 as social centers and gathering places. These racially targeted raids violated the  
7 guarantees of both the California and United States constitutions against racial  
8 discrimination and unreasonable warrantless searches. This Court has jurisdiction  
9 over Plaintiffs' claims pursuant to 28 U.S.C. §1331 (in that they arise under the  
10 Constitution of the United States), § 1343(a)(3) (in that they are brought to redress  
11 deprivations, under color of state authority, of rights, privileges and immunities  
12 secured by the United States Constitution), § 1343(a)(4) (in that they seek to  
13 secure equitable relief under 42 U.S.C. §1983), and the Declaratory Judgment Act,  
14 28 U.S.C. §§ 2201(a) and 2202. This Court has jurisdiction over Plaintiffs'  
15 supplemental state law claims arising out of the same controversy pursuant to  
16 28 U.S.C. § 1367.

17 2. Venue is proper in the Central District of California under 28 U.S.C.  
18 § 1391(b). Defendants are located in the Central District and all of the acts and/or  
19 omissions complained of herein occurred or will occur in this District.

20 **INTRODUCTION**

21 3. On April 2, 2008, officers from the Moreno Valley Police Department  
22 ("MVPD"), acting in conjunction with state and local inspectors, conducted raid-  
23 style searches on a number of African-American barbershops that housed  
24 legitimate, respected businesses and were used by members of the African  
25 American community as social centers. Despite the complete absence of any  
26 physical threat and the peaceful nature of all previous health and business  
27 inspections, the MVPD officers were armed with handguns and wore bulletproof  
28 vests. The police acted in conjunction with California Department of Consumer

1 Affairs Board of Barbering and Cosmetology (the “Board”) and the City of  
2 Moreno Valley Code and Neighborhood Services Division (“Code Enforcement”),  
3 under the ruse of conducting ordinary health and business inspections. The raid-  
4 style searches that ensued, however, were more intrusive in nature and scope than  
5 justified in any ordinary business inspection. Upon information and belief, this  
6 joint operation was initiated and undertaken at the request of MVPD officers. In  
7 the two businesses addressed in this action – the Hair Shack and Fades Unlimited  
8 – the raids included questioning of customers and extensive searches, but  
9 produced no evidence of any wrongdoing other than routine issues concerning  
10 maintenance and storage of barbering supplies and equipment. Following the  
11 searches of April 2, 2008, business declined for barbers at both the Hair Shack and  
12 Fades Unlimited.

13 4. Five of the six barbershops Defendants selected as targets for their  
14 raid-style inspections on April 2, 2008, were owned, operated, and primarily  
15 frequented by African Americans. This stark disparity and the unusually  
16 aggressive conduct of the MVPD during the raid-style inspections indicate that  
17 Defendants’ decision to target these business in the manner they did was based, in  
18 part or in whole, on the race of the barbers and their clientele.

19 5. Fades Unlimited had been subjected to two prior warrantless  
20 “inspections” by MVPD, once by MVPD officers and once by MVPD officers  
21 along with one Code Enforcement officer. During the course of these earlier  
22 inspections, MVPD officers demanded identification from barbers and customers,  
23 ran warrants, and searched through drawers and containers.

24 6. The above raids by the MVPD trampled Plaintiffs’ right to Equal  
25 Protection under the Fourteenth Amendment to the United States Constitution, and  
26 Article I, section 7 of the California Constitution, providing that the government  
27 cannot target individuals or businesses for investigation on the basis of race.  
28 Defendants further violated the guarantee of the Fourth Amendment to the United

1 States Constitution and Article I, section 13 of the California Constitution, that the  
2 government cannot subject individuals or businesses to unreasonable searches.  
3 Plaintiffs, barbers in business for themselves in the raided shops, bring this case to  
4 seek compensation, to obtain a declaration that Defendants' acts were unlawful,  
5 and to enjoin Defendants from applying their policies that resulted in in teh  
6 violations of constitutional rights alleged herein.

7 **PARTIES**

8 7. Plaintiff Kevon Gordon is a barber and the owner of the Hair Shack, a  
9 barbershop in Moreno Valley, California, and is a resident of the City of  
10 Riverside, California. Mr. Gordon is African American.

11 8. Plaintiff Ron Jones is a barber who works at the Hair Shack and is a  
12 resident of Moreno Valley, California. Mr. Jones is African American.

13 9. Plaintiff Raymond Barnes is a barber who, on April 2, 2008, worked  
14 at Fades Unlimited, a barbershop in Moreno Valley, California. Mr. Barnes  
15 resides in Moreno Valley and is African American.

16 10. Plaintiff Quincy Brown is a barber who, on April 2, 2008, worked at  
17 Fades Unlimited, a barbershop in Moreno Valley, California. Mr. Brown resides  
18 in Riverside, California, and is African American.

19 11. Defendant City of Moreno Valley (the "City") is a municipality  
20 located in Riverside County, California. The City of Moreno Valley is one of the  
21 legal entities responsible for the acts and omissions of the MVPD and Code  
22 Enforcement, including the policies concerning administrative inspections and  
23 criminal investigations.

24 12. Defendant Rick Hall is the Chief of Police for MVPD. He is sued in  
25 his official capacity.

26 13. Defendant Stan Sniff is the Riverside County Sheriff. The County of  
27 Riverside Sheriff's Department ("Sheriff's Department") provides police services  
28 to the City of Moreno Valley under contract with the City of Moreno Valley.

1 Sheriff Sniff is sued in his official capacity.

2 14. Defendant County of Riverside (the "County") is a county of the State  
3 of California. The County operates the County of Riverside Sheriff's Department,  
4 which operates the MVPD pursuant to a contract to provide police services to the  
5 City of Moreno Valley. Upon information and belief, the Riverside County  
6 Sheriff's Department remains responsible for the discipline of officers assigned to  
7 the MVPD, who remain employees and agents of the County. The County remain  
8 in part responsible for the policies and procedures of the MVPD.

9 15. Defendant Kristy Underwood is the Executive Officer of the Board.  
10 In her official capacity, Defendant Underwood is responsible for setting policies  
11 and procedures concerning the Board's inspectors. Ms. Underwood is sued in her  
12 official capacity.

13 16. Defendants Tony Heisterberg, Dennis Longdyke, and Lori Miller  
14 (collectively, the "Code Enforcement Officers") are Code Enforcement officers  
15 employed by the City of Moreno Valley. They are sued in their individual  
16 capacities.

17 17. Defendants Seth Hartnett, Robert Duckett, Mario Herrera, Eric  
18 Brewer, Anthony Johnson, Christopher Gastinger, and Richard Hutson  
19 (collectively, the "MVPD Officers") are peace officers employed by the County of  
20 Riverside assigned to the MVPD. They are sued in their individual capacities.

21 18. Defendants Joe Brown, Xochi Camargo, and Arlene Bauby  
22 (collectively, the "Board Officers") are inspectors employed by the Board. They  
23 are sued in their individual capacities.

24 19. The true names and capacities of defendants Does 1 through 10 are  
25 unknown to Plaintiffs who therefore sue these Defendants by fictitious names.  
26 Doe Defendants include the supervisors at MVPD, Code Enforcement, and the  
27 Board who directly approved the acts described herein, as well as agents, officers  
28 and employees of MVPD, Code Enforcement, and the Board who participated in

1 the raid but are not named herein. Plaintiffs will amend this Complaint to show  
2 Doe Defendants' true names and capacities when they have been ascertained.  
3 Plaintiffs are informed and believe, and herein allege, that such Doe Defendants  
4 are residents of California.

5 **FACTUAL ALLEGATIONS**

6 20. Plaintiffs Gordon and Jones have operated the Hair Shack, a  
7 barbershop in Moreno Valley California, in the same location since about 1987.  
8 Mr. Gordon and Mr. Jones — the only two barbers who work in the Hair Shack —  
9 are themselves both African American. While the Hair Shack serves a variety of  
10 clients, the majority are African American. The front lobby of the Hair Shack is  
11 decorated with posters showing sample haircuts, all of which use African  
12 American models. The magazines in the lobby of the Hair Shack are magazines  
13 directed to an African American readership, including Ebony, Hip Hop Soul,  
14 King, Smooth Hair, and Source.

15 21. Fades Unlimited operated as a barbershop in Moreno Valley from  
16 about 2003, or earlier, until about 2008. During 2007 and 2008, plaintiffs Barnes  
17 and Brown worked at Fades Unlimited as an independent contractors, paying a  
18 weekly fee for his station and retaining all proceeds from his clients. All the  
19 barbers who worked at Fades Unlimited during the relevant period of late 2007 to  
20 2008 were African American, and most of the clientele was African American.  
21 The name "Fades Unlimited" refers to a type of haircut, a "fade," that is popular  
22 among African American men. There were pictures of sample haircuts in the  
23 lobby, all or substantially all of which used African American models. The lobby  
24 contained magazines directed toward an African American readership, including  
25 Ebony, Jet, and Oprah. Art on the walls represented African American subjects.

26 22. At all relevant times, the Hair Shack and Fades Unlimited have  
27 served as community and social centers for African American residents of Moreno  
28 Valley. Because most of Plaintiffs' clientele at both the Hair Shack and Fades

1 Unlimited consisted of repeat customers who returned for their haircuts every one  
2 to three weeks, barbers and customers knew each other well. The atmosphere in  
3 each place was friendly – barbers, customers who were being served, and those  
4 who were waiting all talked with one another about politics, sports and current  
5 events. On weekends at the Hair Shack, customers often remained to socialize  
6 after their haircuts were finished, and long-time customers would stop by to talk  
7 without getting a haircut at all. Hair Shack also allowed customers to play cards  
8 and dominoes in a back room not used for barbering.

9       23. On April 2, 2008, the MVPD, acting in conjunction with Moreno  
10 Valley Code Enforcement and Board inspectors conducted unannounced  
11 inspections and searches on barbershops in the City of Moreno Valley. Upon  
12 information and belief, the operation targeted six barbershops, five of which were  
13 owned and operated by African Americans and served primarily African American  
14 clientele. The Hair Shack and Fades Unlimited were among the targeted African  
15 American barbershops.

16       24. During the April 2, 2008, raids on the Hair Shack, two MVPD police  
17 cars pulled up to the front of the Hair Shack, while another police car pulled into  
18 the alley behind the Hair Shack. Approximately five MVPD officers wearing  
19 bulletproof vests and side arms ran into the shop accompanied by about three  
20 Board officers and about two officers from Code Enforcement. One MVPD  
21 officer stood in the front doorway while others entered the barbering area and the  
22 back room of the shop. The officer in the alley guarded the back door to the Hair  
23 Shack from his police car. The officers never claimed that they had a warrant to  
24 conduct a search and never produced a warrant. For approximately one-half hour,  
25 the MVPD, Code Enforcement, and Board officers conducted an extensive search  
26 of the Hair Shack, including areas where no barbering was performed, and  
27 questioned employees and customers. The search was more extensive and  
28 intrusive than necessary to determine compliance with barbering or business



1 regulations. During the search, MVPD officers followed Board officers closely  
2 and looked in the drawers and cabinets as Board officers opened them and  
3 searched their contents.

4 25. Also on April 2, 2008, MVPD officers, accompanied by Code  
5 Enforcement and Board inspectors, rushed into Fades Unlimited, blocking the  
6 entrance so that no one could enter or leave. MVPD officers questioned  
7 employees and customers, collected drivers licenses from them, and ran warrant  
8 checks on them. Officers and inspectors conducted an extensive search of the  
9 shop. The search was more intrusive than necessary to determine compliance with  
10 barbering or business regulations. During the search, MVPD officers followed  
11 Board officers closely and looked in the drawers and cabinets as Board officers  
12 opened them and searched their contents. When plaintiff Brown expressed his  
13 objections to the searches, an officer handcuffed him, took him to a police car in  
14 the parking lot, placed him handcuffed in the back of the car, and told him they  
15 had found an outstanding warrant. After about ten minutes, officers released  
16 Brown and allowed him back inside the shop.

17 26. MVPD officers had previously inspected Fades Unlimited on two  
18 occasions, once in about late 2007 or early 2008, and again in about early 2008.  
19 Some of the same MVPD officers were present on one or more of these occasions  
20 and on the raid of April 2, 2008.

21 27. During the first inspection of Fades Unlimited in about late 2007,  
22 MVPD officers came without any Board or Code Enforcement officers and  
23 questioned and checked identification of employees and customers. Upon  
24 information and belief, MVPD officers ran warrant checks on individuals whose  
25 identification they had collected. Upon information and belief, MVPD officers  
26 took one of the barbers to his residence, searched it with his consent, and returned  
27 him to the shop. Officers never stated they had a warrant for this search and  
28 never produced such a warrant.

1           28. In early 2008, a Code Enforcement officer accompanied the MVPD to  
2 Fades Unlimited and conducted a cursory visual inspection of the shop. The  
3 MVPD used this agency inspection as an excuse once again to collect  
4 identification from all the barbers. Upon information and belief, MVPD officers  
5 ran warrant checks on individuals whose identification they had collected. Both  
6 MVPD officers and the Code Enforcement officer opened cabinets, drawers and  
7 containers belonging to some of the barbers. Officers neither produced a warrant  
8 nor claimed the search was authorized by warrant.

9           29. Upon information and belief, the inspections conducted at the other  
10 African-American businesses on April 2, 2008, were conducted in a similarly  
11 invasive and intrusive manner.

12           30. Upon information and belief, following the April 2, 2008, raids there  
13 was substantial outcry among members of the community, leading to several  
14 media stories and a community meeting with the Mayor of Moreno Valley. In  
15 comments to the media and to the public, the Mayor, City Council members, and  
16 Chief Hall defended the raids as legitimate law enforcement operations. The  
17 Sheriff's Department characterized the sweeps as a "City issue." A Code  
18 Enforcement official told members of the press his department would conduct  
19 such sweeps in the future, saying, "This is not a one-time event," and  
20 characterizing the joint operation as successful. Upon information and belief, no  
21 action was taken by either the City, the Sheriff's Department, or the MVPD to  
22 discipline officers and officials involved, to correct policies or procedures that led  
23 to the searches, or to make clear to officers or to the community that the searches  
24 were unlawful.

25           31. Business dropped significantly for all Plaintiffs following these police  
26 searches.

27           32. Upon information and belief, defendants Hartnett, Duckett, Herrera,  
28 Brewer, Johnson, Gastinger, and Hutson were the MVPD officers who participated

1 in the raids on Fades Unlimited and the Hair Shack on April 2, 2008, and/or in the  
2 two earlier raids on Fades Unlimited.

3 33. Upon information and belief, defendants Heisterberg, Longdyke and  
4 Miller were the Code Enforcement officers who participated in the raids on Fades  
5 Unlimited and the Hair Shack on April 2, 2008, and/or in the earlier raid on Fades  
6 Unlimited.

7 34. Upon information and belief, defendants Brown, Camargo, and  
8 Bauby were the Board inspectors who participated in the raids on Fades Unlimited  
9 and the Hair Shack on April 2, 2008.

10 35. Upon information and belief, based on the open and deliberate  
11 manner in which the raids were carried out, the need for multi-agency  
12 coordination, and the unusual nature of the raids, it can be inferred that  
13 supervisors at Code Enforcement, MVPD (or the Sheriff's Department) and/or the  
14 Board approved in advance the manner in which the raids would be conducted,  
15 which businesses would be selected for raid, or the manner in which businesses  
16 would be selected for raids. These supervisors number among the Doe Defendants.

17 **CAUSES OF ACTION**

18 **FIRST CAUSE OF ACTION**

19 **Violation of the Fourteenth Amendment; 42 U.S.C. § 1983**

20 **(Against defendants Hartnett, Duckett, Herrera, Brewer, Johnson, Gastinger,**  
21 **Hutson, Heisterberg, Longdyke, Miller, Brown, Camargo, and Bauby; and**  
22 **Does 1-10, in their individual capacities)**

23 36. Plaintiffs reallege and incorporate the foregoing paragraphs as if set  
24 forth herein.

25 37. Defendants' actions described herein violated the rights of Plaintiffs  
26 under the Equal Protection Clause of the Fourteenth Amendment to the United  
27 States Constitution by depriving Plaintiffs of their right to equal protection under  
28 the law.

1 38. Defendants' actions deprived Plaintiffs of their right to equal  
2 protection under the law by selecting Plaintiffs' businesses for search and  
3 inspection on the basis of Plaintiffs' race and the race of the owners, employees  
4 and clientele at Plaintiffs' businesses.

5 39. Defendants' conduct violated clearly established constitutional or  
6 other rights, of which Defendants knew, or of which reasonable public officials  
7 should have known, rendering Defendants liable to Plaintiffs under 42 U.S.C.  
8 § 1983.

9 40. Upon information and belief, the statements of City and County  
10 officials following the raids indicate that the City and County subsequently ratified  
11 the raids, including the manner in which businesses were selected for search.

12 41. As a direct and proximate result of the unlawful actions of these  
13 Defendants, Plaintiffs have suffered significant emotional and economic harm.

14 **SECOND CAUSE OF ACTION**

15 **Violation of the Fourth Amendment; 42 U.S.C. § 1983**

16 **(Against the City, the County, defendants Hartnett, Duckett, Herrera,**  
17 **Brewer, Johnson, Gastinger, Hutson, Heisterberg, Longdyke, Miller, Brown,**  
18 **Camargo, and Bauby; and Does 1-10, in their individual capacities)**

19 42. Plaintiffs reallege and incorporate the foregoing paragraphs as if set  
20 forth herein.

21 43. Defendants' actions described herein violated the rights of Plaintiffs  
22 under the Fourth Amendment to the United States Constitution by subjecting  
23 Plaintiffs to unreasonable warrantless searches.

24 44. Upon information and belief, the open and deliberate manner in  
25 which these raids were carried out, the fact that they were a coordinated multi-  
26 agency operation, the fact that the officers acted in a similar fashion repeatedly at  
27 other businesses, and the statements of City and County officials following the  
28 raids indicate that the raids were conducted according to custom and practice of

1 the City and the Sheriff's Department, that the City and County inadequately  
2 trained their officers and employees on the constitutional limits of warrantless  
3 searches, and that the City and County subsequently ratified the raids.

4 45. Defendants' conduct violated clearly established constitutional or  
5 other rights, of which Defendants knew, or of which reasonable public officials  
6 should have known, rendering Defendants liable to Plaintiffs under 42 U.S.C.  
7 § 1983.

8 46. As a direct and proximate result of the unlawful actions of these  
9 Defendants, Plaintiffs have suffered significant emotional and economic harm.

10 **THIRD CAUSE OF ACTION**

11 **Violation of Cal. Constitution, Art. I, § 7; Cal. Civil Code §52.1**

12 **(Against Defendants Underwood, Hall and Sniff for injunctive relief only.)**

13 47. Plaintiffs reallege and incorporate the foregoing paragraphs as if set  
14 forth herein.

15 48. Defendants' actions described herein violated the rights of Plaintiffs  
16 to equal protection of the laws under Article I, section 7 of the California  
17 Constitution. Defendants deprived Plaintiffs of these rights through, among other  
18 means, the threat of force and intimidation.

19 49. Defendants' use of threats, intimidation and coercion, as well as their  
20 attempts to use threats, intimidation and coercion, to deprive Plaintiffs of the equal  
21 protection of the laws violates Plaintiffs' rights under California Civil Code §52.1  
22 to be free from such threats, intimidation and coercion in the exercise of rights  
23 guaranteed to Plaintiffs by the United States and California Constitutions.

24 **FOURTH CAUSE OF ACTION**

25 **Violation of Cal. Constitution, Art. I, § 13; Cal. Civil Code § 52.1**

26 **(Against Defendants Underwood, Hall and Sniff for injunctive relief only.)**

27 50. Plaintiffs reallege and incorporate the foregoing paragraphs as if set  
28 forth herein.



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administrative searches as described herein;

c. To the extent the Court finds that state statutes and regulations authorized Defendants' conduct, a declaration that those state statutes and regulations are unconstitutional under the Fourth Amendment to the United States Constitution.

d. As to the City of Moreno Valley, the County of Riverside, and individual defendants sued in their individual capacities, compensatory damages for violation of the laws and Constitution of the United States, in an amount to be determined at trial;

e. Reasonable attorneys' fees and costs; and

f. All other appropriate relief as may be just and proper.

Dated: *May 22, 2009*

ACLU Foundation of Southern California  
Seyfarth Shaw LLP

By *Rishi Puri/PB*  
Rishi Puri

By *Peter Bibring*  
Peter Bibring

Attorneys for Plaintiffs Kevon Gordon,  
Ronald Jones, Raymond Barnes, and Quincy  
Brown

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**PROOF OF PERSONAL SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 1313 West Eighth Street., Los Angeles, CA 90017.

On May 22, 2009, I served the foregoing document:

**FIRST AMENDED COMPLAINT**

personally on the parties in this action by delivering a true and correct copy of each document thereof to:

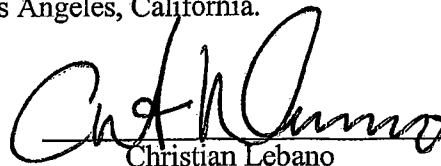
**SEE ATTACHED SERVICE LIST**

**BY FIRST CLASS MAIL:** I am readily familiar with the business' practice of collection and processing correspondence for mailing with the United States Postal Service. I know that the correspondence is deposited with the United States Postal Service on the same day this declaration was executed in the ordinary course of business. I know that the envelope was sealed and, with postage thereon fully prepaid, placed for collection and mailing on this date, following ordinary business practices, in the United States mail at Los Angeles, California.

**BY ELECTRONIC DELIVERY:** by transmitting a true and correct copy via electronic mail, with prior advance permission of counsel, to the email addresses contained on the attached service list.

I am employed in the office of a member of the bar of the State of California at whose direction service was made.

Executed this May 22, 2009, at Los Angeles, California.

  
Christian Lebano



**SERVICE LIST**

MICHAEL A. BELL, SBN 034900  
LA FOLLETTE, JOHNSON, DEHAAS, FESLER & AMES  
A Professional Corporation  
2280 Market Street, Suite 140  
Riverside, CA 92501  
Phone: (951) 275-9192  
Fax: (951) 275-9249  
Email: mbell@ljdfa.com

ROBERT D. HERRICK, SBN 100916  
City Attorney, City of Moreno Valley  
ROBERT L. HANSEN, SBN 130677  
Assistant City Attorney, City of Moreno Valley  
14177 Frederick Street  
Moreno Valley, CA 92552  
Phone: (951) 413-3000  
Fax: (951) 413-3034  
Email: Mr. Herrick - bobh@moval.org  
Email: Mr. Hansen - bobha@moval.org

TIMOTHY T. COATES, SBN 110364  
GREINES, MARTIN, STEIN & RICHLAND, LLP  
5900 Wilshire Boulevard, 12th Floor  
Los Angeles, CA 90036  
Phone: (310) 859-7811  
Fax: (310) 276-5261  
Email: tcoates@gmsr.com

Attorneys for defendant City of Moreno Valley

JOHN M. PORTER, SBN 62427  
LEWIS, BRISBOIS, BISGAARD & SMITH LLP  
650 E. Hospitality Lane, Suite 600  
San Bernardino, CA 92408  
Phone: (909) 387-1130  
Fax: (909) 387-1138  
Email: porter@lbbslaw.com

CHRISTOPHER D. LOCKWOOD, SBN 110853  
ARIAS & LOCKWOOD  
225 W. Hospitality Lane, Suite 314  
San Bernardino, CA 92408  
Phone: (909) 890-0125  
Fax: (909) 890-0185  
Email: christopher.lockwood@ariaslockwood.com

Attorneys for defedants Stan Sniff, Rick Hall and the County of Riverside

EDMUND G. BROWN JR  
Attorney General of the State of California  
JAMES M. LEDAKIS  
Supervising Deputy Attorney General  
DIANE DE KERVOR, SBN 174721  
Deputy Attorney General  
110 West "A" Street, Suite 1100  
San Diego, CA 92101  
PO Box 85266  
San Diego, CA 92186-5266  
Phone: (619) 645-2611  
Fax: (619) 645-2061  
Email: [diane.dekervor@doj.ca.gov](mailto:diane.dekervor@doj.ca.gov)

Attorneys for Defendant Kristy Underwood, Executive Officer of the California Board of  
Barbering & Cosmetology

FOR OFFICE USE ONLY

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

KEVON GORDON, RON JONES, RAYMOND BARNES, QUINCY BROWN  
PLAINTIFF(S)  
v.

CASE NUMBER  
ED CV 09-00688 SGL (SSx)

CITY OF MORENO VALLEY, (see attached list of Defendants)  
DEFENDANT(S).

SUMMONS

FOR OFFICE USE ONLY

TO: DEFENDANT(S): See attachment.

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached  complaint  First amended complaint  counterclaim  cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Peter Bibring, whose address is 1313 W. 8th Street, Los Angeles, California, 90017. If you fail to do so, 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.

TERRY NAFISI

Clerk, U.S. District Court

Dated: MAY 22 2009

By: L. MURRAY

Deputy Clerk  
(for the Court)  
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[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

1 PETER BIBRING (SBN 223981)  
Email: pbibring@aclu-sc.org  
2 MARK ROSENBAUM (SBN 59940)  
Email: mrosenbaum@aclu-sc.org  
3 PETER J. ELIASBERG (SBN 189110)  
Email: peliasberg@aclu-sc.org  
4 ACLU FOUNDATION  
OF SOUTHERN CALIFORNIA  
5 1313 West Eighth Street  
Los Angeles, CA 90017  
6 Telephone: (213) 977-9500  
7 Facsimile: (213) 977-5297

8 STACY SHARTIN (SBN 58281)  
Email: sshartin@seyfarth.com  
9 RISHI PURI (SBN 252718)  
Email: rpuri@seyfarth.com  
10 SEYFARTH SHAW LLP  
2029 Century Park East, Suite 500  
11 Los Angeles, California 90067-3063  
Telephone: (310) 277-7200  
12 Facsimile: (310) 291-5219

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CENTRAL DIST. OF CALIF.  
RIVERSIDE

14 UNITED STATES DISTRICT COURT  
15 CENTRAL DISTRICT OF CALIFORNIA  
16 EASTERN DIVISION

19 KEVON GORDON, RONALD  
20 JONES, RAYMOND BARNES,  
QUINCY BROWN

21 Plaintiffs,

22 vs.

23 CITY OF MORENO VALLEY, a  
Municipal Corporation; COUNTY  
24 OF RIVERSIDE; RICK HALL,  
CHIEF OF THE MORENO VALLEY  
25 POLICE DEPARTMENT, in his  
official capacity; KRISTY  
26 UNDERWOOD, EXECUTIVE  
OFFICER OF THE CALIFORNIA  
27 BOARD OF BARBERING AND  
COSMETOLOGY, in her official  
28 capacity; STAN SNIFF, RIVERSIDE  
COUNTY SHERIFF, in his official  
capacity; TONY HEISTERBERG,

Case No. ED CV 09-00688 SGL (SSx)  
FIRST AMENDED COMPLAINT

FOR OFFICE USE ONLY

DEMAND FOR JURY TRIAL

Assigned to: Judge Stephen G. Larson

1 DENNIS LONGDYKE, LORI  
2 MILLER, SETH HARTNETT,  
3 ROBERT DUCKETT, MARIO  
4 HERRERA, ERIC BREWER,  
5 ANTHONY JOHNSON,  
6 CHRISTOPHER GASTINGER,  
7 RICHARD HUTSON, JOE BROWN,  
8 XOCHI CARMARGÓ, ARLENE  
9 BAUBY, and DOES 1-20, in their  
10 individual capacities,

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Defendants.