

ORIGINAL

1 Name: Scott E Pombrio
2 Address: 2055 Vignes
3 Los Angeles, Ca 90012
4 Phone: Ø

5 Plaintiff In Pro Per

7 UNITED STATES DISTRICT COURT
8 CENTRAL DISTRICT OF CALIFORNIA

9
10 Scott E. Pombrio, et al.

11 PLAINTIFF,

12 vs.

13 City-County of Los Angeles
14 Mayor A. Villalobos

Case No.:

CV10-05604 (MAN)

(To be supplied by the Clerk)

COMPLAINT FOR:

Civil and ADA Rights
Violations; Per 42 USC §1983;
42 USC § 12101 et seq.

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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY [Signature]

DEFENDANT(S).

Jury Trial Demanded

I. JURISDICTION

1. This Court has jurisdiction under 28 USC § 1331 + 28 USC § 1343
can within the Central District's Jurisdiction.

1 **II. VENUE**

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3 2. Venue is proper pursuant to both parties reside within
4 the Central District.
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8 **III. PARTIES**

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12 3. Plaintiff's name is A. Villagrosa Scott E. Pombro Plaintiff resides
13 at: City Hall of Los Angeles, Ca. 90012
14 1055 Virgnes
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18 4. Defendant A. Villagrosa, Mayor City of Los Angeles
19 et al
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24 5. Defendant John Doe, Security Supervisor LH Co
25 Law Library, et al
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IV. STATEMENT OF FACTS

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3 A. On 7-27-10, plaintiff entered LACo Law Library
4 (LL), with backpack, coat attached to same, and 2 plastic
5 bags containing water, cans & plastic bottles crushed, food,
6 etc. Asked security if he needed to inspect it? States
7 "No". Stayed 1 hour on preparation of Federal forms
8 for Fresno USDC on an HC. This 7-28-10, enter
9 LL, Supervisor Doe halts plaintiff, inspects same & states
10 "you may not enter here with any of that - see supra."
11

12 B. Plaintiff is ADA-Mobility Impaired needing
13 various surgery to repair further bone-muscle damages
14 from Assaults. Plus, just diagnosed a double inguinal
15 hernia's, need surgery also. The LACo LL is on a high
16 hill (Banker Hill), making plaintiff futilely have to walk up
17 & down at the whim of LA's numerous Security Officers
18 thru-out the city, causes undue pain and creates a
19 hardship to Homeless Plaintiffs in violation of 42 USC 81202 et seq
20

21 C. When plaintiff asked Security Doe "if you (Doe)
22 are violating my Civil and ADA rights?" Doe replied
23 "I don't care, you can't come in here (LL) with that
24 stuff!" Plaintiff asks "What of my Due Process & Equal
25 Protection Rights for ongoing Federal cases?" Same
26 reply supra. Thus violating 42 USC 51983, the 8th & 14th
27 amendments of the US Constitutions guarantees of Due
28 Process, Legal Materials Research on Appeal, without further

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C. (continues) infliction of pain that surely amounts to
^{Insert ¶ #} cruelty. Plaintiff has Never caused One (1) problem at the
LL, and when Doe asked he leave, plaintiff did. But
all thruout the city of L.A., Security harasses & threatens
any persons "they" deem Unfit, while ignoring both Cal's
Civil Code 56, & 42 USC §1983 - 22101 et seq. Plaintiff is has
been threatened "Daily" with arrest, handcuffs & imprisonment
for just "claimed trespass." Not under supra statues.

^{Insert ¶ #}

^{Insert ¶ #}

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V. CAUSES OF ACTION

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FIRST CAUSE OF ACTION

(CIVIL AND ADA RIGHTS VIOLATIONS)
insert title of cause of action

(As against Defendant(s): A. Villagrosa, Mayor et al; and
LACo LL Security Supervisor Doe)

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a. Insert ¶ # Do/did daily deny access to the Law Library to the homeless by crafting rules specifically against their possession of own personal property be allowed into the LL. Said property falls "within the LLs guidelines", except for food, which is both cruel & a civil rights violation.

b. Insert ¶ # Do use entirely "Arbitrary Methods" to routinely deny access to Public Buildings & Places for merely being homeless, or ADA qualified. While practicing entirely different rules to the affluent - as eating & drinking in the LL, or even in Public.

c. Insert ¶ # Do Ban any & all outsiders to Private Parties held on Public Premises. As a recent party Sat. pm at the Main Library, plaintiff stopped for water, but 3 Security Does kept him 6 feet from the fountain, while intimidating, threatening & Laying hand on plaintiff - on Public Property. A 14th amendment violation of equal protection, and 8th amendment.

SECOND CAUSE OF ACTION

(Due Process Violation
insert title of cause of action)

(As against Defendant(s): Security Supervisor Doe; Mayor
A. Villogrosa.)

d. Insert ¶# The arbitrary denial of access to the LL; also
denies access to the Great Writ, the right to appeal,
access to the proper legal forms & research. Plus, the
access to Civil Remedies. All are clear 14th amendment
violations

Insert ¶#

Insert ¶#

VI. REQUEST FOR RELIEF

WHEREFORE, the Plaintiff requests:

 . Insert ¶ # The LACo. LL allow the homeless pro se or pers, access to the library-with their possessions kept either with them, or outside the Front Door. Or a small storage area for those who possess "too much property."

 . Insert ¶ # The court issue an immediate Injunction for supra's requests, and total access to the Law Library, Post Alaska

 . Insert ¶ # A sum of \$? to be used for supras requests, the entire courts costs; and any and all such other costs the court may assess.

 . Insert ¶ #

VII. DEMAND FOR JURY TRIAL

Plaintiff hereby requests a jury trial on all issues raised in this complaint.

Dated: 7-28-10

Sign: Scott E Pombrio

Print Name: Scott E Pombrio

Plaintiff in pro per

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