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

BY 

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

5 Plaintiff In Pro Per

6  
7 UNITED STATES DISTRICT COURT  
8 CENTRAL DISTRICT OF CALIFORNIA

9 Case No.: **CV10-05604**

*GHK*  
*(MAN)*

10 Scott E. Pombria, et al,

(To be supplied by the Clerk)

11 PLAINTIFF,

COMPLAINT FOR:

12 vs.

Civil and ADA Rights

13 City-County of Los Angeles


Violations; Per 42 USC § 1983;

14 Mayor A. Villalobos

42 USC § 12101 et seq.

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

BY 

DEFENDANT(S).

Jury Trial Demanded

**I. JURISDICTION**

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

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**II. VENUE**

2. Venue is proper pursuant to both parties reside within the Central District.

**III. PARTIES**

3. Plaintiff's name is A. Villagrosa Scott E. Pamba Plaintiff resides at: City Hall of Los Angeles, Ca. 90012  
LOSS Virgues

4. Defendant A. Villagrosa, Mayor City of Los Angeles  
etal

5. Defendant John Doe, Security Supervisor L# Co  
Law Library, etal

#### IV. STATEMENT OF FACTS

1  
2  
3 A. On 7-27-10, plaintiff entered LACo Low 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 USDO on an H.C. 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 fatigably 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 Plaintiff's in violation of 42 USC 8121a 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 8<sup>th</sup> & 14<sup>th</sup>  
27 amendments of the US Constitution's 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  
<sup>Insert ¶ #</sup> cruelty. Plaintiff has Never caused One (1) problem at the  
LL, and when Doe asked he leave, plamt. # 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~~ statutes.

<sup>Insert ¶ #</sup>

<sup>Insert ¶ #</sup>

**V. CAUSES OF ACTION**

**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 L.L. Security Supervisor Doe )

a. Insert ¶ # Did/do 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 14<sup>th</sup> amendment violation of equal protection, and 8<sup>th</sup> amendment.

**SECOND CAUSE OF ACTION**

(Due Process Violation)  
insert title of cause of action

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

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 14<sup>th</sup> amendment violations

Insert ¶ #

Insert ¶ #

**VI. REQUEST FOR RELIEF**

WHEREFORE, the Plaintiff requests:

        :          The LACo. LL allow the homeless pro se or pers,  
*Insert ¶ #* 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."

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

        :          A sum of \$? to be used for supras requests,  
*Insert ¶ #* 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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**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

**I (a) PLAINTIFFS** (Check box if you are representing yourself   
*Scott E Pombrio, et al*

**DEFENDANTS**  
*A. Villagros et al  
T.000 Security LACOLL*

**(b) Attorneys** (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)  
*Scott E Pombrio  
Loss Vignes  
No Phone  
LA, Ca 90012*

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 - For Diversity Cases Only**  
(Place an X in one box for plaintiff and one for defendant.)

- |   |                            |                            |   |                            |                            |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
|   | <b>PTF</b>                 | <b>DEF</b>                 |   | <b>PTF</b>                 | <b>DEF</b>                 |
| 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. 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 Multi-District Litigation     7 Appeal to District Judge from Magistrate Judge

**V. REQUESTED IN COMPLAINT: JURY DEMAND:**  Yes     No (Check 'Yes' only if demanded in complaint.)

**CLASS ACTION** under F.R.C.P. 23:  Yes     No

**MONEY DEMANDED IN COMPLAINT:** \$ over \$25,000

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)  
*42 USC § 1983, and 42 USC § 12101 et seq. Violations*

**VII. NATURE OF SUIT** (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER	LABOR
<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <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"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State 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 Loan (Excl. 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 <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	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. 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-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<b>PERSONAL PROPERTY</b> <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 <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus <input type="checkbox"/> 535 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <b>FORFEITURE/PENALTY</b> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <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)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

**CV10-05604**

FOR OFFICE USE ONLY: Case Number: \_\_\_\_\_

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

**VIII(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed?  No  Yes  
If yes, list case number(s): \_\_\_\_\_

**VIII(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case?  No  Yes  
If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

- (Check all boxes that apply)  A. Arise from the same or closely related transactions, happenings, or events; or  
 B. Call for determination of the same or substantially related or similar questions of law and fact; or  
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**IX. VENUE:** (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.  
 Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.  
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.  
**Note: In land condemnation cases, use the location of the tract of land involved.**

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

\* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties  
**Note: In land condemnation cases, use the location of the tract of land involved**

X. SIGNATURE OF ATTORNEY (OR PRO PER): Scott E. Pombo Date 7-28-20

**Notice to Counsel/Parties:** The CV-71 (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. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

**Key to Statistical codes relating to Social Security Cases:**

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))