



PLD-PI-001

SHORT TITLE: MASON vs. SECURITAS SECURITY, Et Al AND DOES 1-10	CASE NUMBER:
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4. ☐ Plaintiff (*name*):

is doing business under the fictitious name (*specify*):

and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person

a. ☐ **except** defendant (*name*):

- (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (*describe*):

(4) ☐ a public entity (*describe*):

(5) ☐ other (*specify*):

c. ☐ **except** defendant (*name*):

- (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (*describe*):

(4) ☐ a public entity (*describe*):

(5) ☐ other (*specify*):

b. ☐ **except** defendant (*name*):

- (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (*describe*):

(4) ☐ a public entity (*describe*):

(5) ☐ other (*specify*):

d. ☐ **except** defendant (*name*):

- (1) ☐ a business organization, form unknown
 (2) ☐ a corporation
 (3) ☐ an unincorporated entity (*describe*):

(4) ☐ a public entity (*describe*):

(5) ☐ other (*specify*):

☐ Information about additional defendants who are not natural persons is contained in Attachment 5.

6. The true names of defendants sued as Does are unknown to plaintiff.

a. ☒ Doe defendants (*specify Doe numbers*): 1 THROUGH (10) TEN were the agents or employees of other named defendants and acted within the scope of that agency or employment.

b. ☒ Doe defendants (*specify Doe numbers*): 1 THROUGH (10) TEN are persons whose capacities are unknown to plaintiff.

7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (*names*):

8. This court is the proper court because

a. ☒ at least one defendant now resides in its jurisdictional area.

b. ☒ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.

c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.

d. ☐ other (*specify*):

9. ☒ Plaintiff is required to comply with a claims statute, and

a. ☐ has complied with applicable claims statutes, or

b. ☒ is excused from complying because (*specify*):

**DUE TO HARDSHIPS WITH NO CONTROL OF PLAINTIFF WHO IS
BLAMELESS AND UPRIGHT**

SHORT TITLE:

MASON vs. SECURITAS SECURITY, Et Al AND DOES 1-10

CASE NUMBER:

10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):

- a. ☐ Motor Vehicle
- b. ☒ General Negligence
- c. ☐ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☒ Other (specify):

GREAT BODILY HARM WITH DAMAGES

11. Plaintiff has suffered

- a. ☒ wage loss
- b. ☒ loss of use of property
- c. ☒ hospital and medical expenses
- d. ☒ general damage
- e. ☒ property damage
- f. ☒ loss of earning capacity
- g. ☒ other damage (specify):

GREAT BODILY HARM WITH DAMAGES

12. ☒ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☒ as follows:

MOTHER DIED

13. The relief sought in this complaint is within the jurisdiction of this court.

THE SUPERIOR COURT OF THE STATE OF CALIFORNIA René C. Davidson Courthouse

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages
- (2) ☒ punitive damages

The amount of damages is (in cases for personal injury or wrongful death, you must check (1)):

- (1) ☐ according to proof
- (2) ☒ in the amount of: \$ TEN MILLION DOLLARS

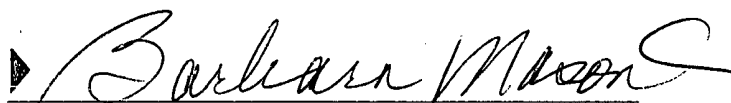
15. ☒ The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers):

ALL NOTED PARAGRAPHS

Date: FEBRUARY 21, 2014

BARBARA MASON

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

1 BARBARA MASON
2 POST OFFICE BOX 285
3 OAKLAND, CALIFORNIA 94604
4
5
6

7 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
8
9 IN AND FOR THE COUNTY OF ALAMEDA
10

11 BARBARA MASON,
12
13 Plaintiff,

Case No. _____

14 vs.

15 SECURITAS SECURITY, and
16 KAISER HOSPITAL

COMPLAINT FOR DAMAGES
UNLIMITED CIVIL CASE

17 As DOES 1-10, inclusive,
18 Defendants
19

20
21
22 PLAINTIFF alleges:

23 Defendants Securitas Security and Kaiser Permanente Foundation Hospital –
24
25 City of Oakland, is and at all times mentioned herein was a Security Agency
26 authorizing within the state of California, and existing under the laws of the State of
27 California.
28

COMPLAINT FOR DAMAGES
UNLIMITED CIVIL CASE

1 At all times mentioned herein, defendants was an employee of Securitas
2 Security and Kaiser Permanente Foundation Hospital in City of Oakland and in doing
3 so committed these heinous malicious acts described hereafter and acted within the
4 course and scope of their employment within the County of Alameda.
5

6
7 PLAINTIFF is ignorant as to the true names and each true capacity as it applies
8 to each defendant and herein files this complaint as DOES 1-10, inclusive, and
9 therefore sues each and every defendant, by true names or by fictitious names.
10

11 PLAINTIFF have the rights to amend and will amend such complaint when
12 informed to allege the true names and each capacity when information is ascertained.
13

14 PLAINTIFF believes and is informed and believes to be true each and every
15 fact presented along with details and witnesses alleges that each of these defendants
16 are negligently and responsible for all injuries sustained and suffered by and from
17 their malicious acts in some manner for this unnecessary occurrences herein alleged,
18 and that all of PLAINTIFF's bodily injuries as herein subscribed and alleged to be true
19 and factual were truly caused by and from these acts by each individual who
20 contributed to the damages and charges suffered by PLAINTIFF due to their
21 negligence, wrongful decisions and means to show off and make PLAINTIFF suffer.
22
23

24 Thereby PLAINTIFF is informed and believes and thereon stated the true and
25 factual occurrences and that at all times herein mentioned each of these defendants are
26
27
28

1 sued including herein as DOES 1-10, inclusive, who was the agent and employee of
2 each defendants who was at all times acting within their purpose and scope of such
3 and employed by either Securitas Security and Kaiser Permanente Foundation
4 Hospital in the city of Oakland, California.
5

6
7 At all times herein mentioned, defendants and DOES 1-10, inclusive, were the
8 agent or servant and employees of defendants or codefendants, and in doing these
9 things hereinafter alleged were acting within the scope of their authority as such
10 agents, servants, or employees and with their permission and consent of these
11 defendants or co-defendants.
12
13

14 On or about June 20, 1013, PLAINTIFF who was in Kaiser Permanente Hospital
15 in Oakland, California and was visiting her mother in room 922A was attacked,
16 handcuffed, beaten down, forced to stand in attention over 4 hours waiting to be
17 arrested without being relieve, but constantly being restrained in a forceful position un
18 natural to the normal body posture and position, creating an hardship on the spinal
19 alignment and pressures onto the nervous system.
20
21

22 At such time and place these defendants performed these tortuous acts with
23 menace, evil, great bodily harm and injuries through their carelessly attacking
24 PLAINTIFF, who at never shown threaten, life, the same as Trey Von Martin, and the
25 Dunn case matter that Plaintiff is Blameless and upright and never did any actions to
26
27
28

1 cause this handcuffing and treatment. Trey Von Martin who was killed along with the
2 victim who also was Black in the Dunn case matter both in the State of Florida.
3
4 Proving to Blacks, that there are separate laws concerning racism is bold and justice is
5 denied. Officers, who attacked twisted, tossed Plaintiff off the floor beneath while she
6 was being wrestled to the floor for handcuffing a weakly 90 pound non-threaten
7 female as a Black race and suffering extreme pains as witnesses watch with surprise
8 while this was occurring who will testify non-threaten, unnecessary and never
9 required or needed by fellow employees of Kaiser Hospital in the City of Oakland,
10 California. Plaintiff remember the top security officer's statements to Plaintiff that he is
11 teaching her a lesson in her Black history.
12

13
14
15 Defendants took PLAINTIFF purse and kept it out of her sight while they stole
16 her cash monies amounts to \$2,500.00 which was used to purchase a second hand
17 vehicle. This money along with keys was in complete control and positions these
18 security officer employed by Kaiser Permanente Hospital in Oakland, California
19 location at MacArthur Blvd.
20
21

22
23 Plaintiff sustained major extreme Injuries such as physical location of the: Left
24 knee, neck, shoulder, right arm, back, spine, hip, lower back, nerves, hands\right
25 thumb, legs, and area of her mouth. These officers attacked her without cause by
26 wrestled Plaintiff to the floor as they twisted her body forcing an extreme painful
27
28

unnatural positions, as each forced their handcuffed tightly around her narrow wrists, each were forcefully pulling her shoulders out of alignment, causing extreme injuries to date she is still suffering extreme pains a year later in both legs, knees, shoulders, arms, nerves, back, hands and body parts. Now, Plaintiff has uncontrolled tremors and nerve attacks to present date.

These particularity facts are sufficient to established that defendants are not only liability but also responsible for incurring, causing these unnecessary unnatural injuries towards Plaintiff without merit or threats by Plaintiff who to date is blameless and in right standings for these procedures.

Again repeat Plaintiff never at any time cause, threaten or implied acts of violence immediate threats at all during this time or at any other moments during this altercation caused by these defendants. Under the color of law, these facts are established by these individuals and each one is liable to PLAINTIFF why now has the legal and lawful rights to recover all injuries in the amounts of TEN MILLION DOLLARS by officers' who willingly choose to do their wrongful acts only because Plaintiff is an AFRICAN AMERICAN.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: Thursday, May 29, 2014

By 
Plaintiff, Barbara MASON

1 BARBARA DOBARD
2 POST OFFICE BOX 285
3 OAKLAND, CALIFORNIA 94604



4
5
6
7 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
8
9 IN AND FOR THE COUNTY OF ALAMEDA

10
11 BARBARA DOBARD,

12 Plaintiff,

13
14 vs.

15 KAISER HOSPITAL and SECURITAS
16 SECURITY, and DOES 1-10,

17
18 Defendants
19

Case No.: _____

PLAINTIFF TO OBTAIN RECORDS,
SUMMARY REPORT, INVESTIGATION
LOG, IR REPORTS NOS. 103 &
104, OBTAINING RECORDS/REPORTS
FROM LAW ENFORCEMENT
AGENCY; SECURITAS SECURITY

20
21 PLAINTIFF is hereby requesting from Defendants, Securitas Security Agency
22 Department records of I.R. Nos. 103 and number 104 complete details, notes and
23 comments along with summary reports by and from in the City of Oakland, Kaiser
24 Permanente Hospital in the City of Oakland, for the State of California and County of
25
26 Alameda
27
28

PLAINTIFF TO OBTAIN RECORDS, SUMMARY REPORT, INVESTIGATION LOG, IR REPORTS
NOS. 103 & 104, OBTAINING RECORDS/REPORTS FROM LAW ENFORCEMENT
AGENCY; SECURITAS SECURITY

1 These reports, records, summary, remarks, notes, logs, identification of
2 employees involved with assault dated in and during the month of June 2013. Such
3 documents requested are hereby governed by the United States Government Code §§
4 58097 - 68097.10 of these sections.
5

6 For good cause and reasons these production of all records and requests hereby
7 made upon and to defendants also known as Securitas Security Agency and Kaiser
8 Permanente Hospital in the City of Oakland, County of Alameda, and State of
9 California are hereby setting forth in full details as the materiality towards these issues
10 involved in this case and with this matter.
11

12 This Law Enforcement Agency has these desired documents in their possession
13 and must immediately turn them over to Plaintiff since documents, reports, log,
14 summary and Investigation Reports are under their control. These factual bases are for
15 this legal law suits for this case with legal conclusion and these materials are necessary
16 for the successful prosecution against defendants for and in these proceedings.
17 I declare under penalty of perjury under the laws of the State of California that
18 the foregoing is true and correct.
19

20 Dated: Friday, December 13, 2013 By Plaintiff, Barbara Dobard
21
22
23
24
25
26
27
28

1 **CLAIM INFORMATION AND CLAIM FORM**
2
3

4 **THE CLAIMANT: BARBARA MASON**

5 ACTION DATED: JUNE 2013

6 FILE RECORD:.....JUNE 28, 2013

7 NOTIFICATION GIVEN TO: Victim Compensation and Government Claims
8 Board @630 K Street, Sacramento AND Cc: State Of California Governor, State
9 Officials & Washington
10

11 TODAY'S ACTION NOTIFICATION DATED:29 May 2014

12
13 This claim to be filed for losses Plaintiff, Barbara believed was caused by the
14 action and inaction of this agency.
15

16 This claim incurred: Damages to person, reimbursement for losses, benefits,
17 salary and expenses.
18

19 This claim for damages caused by these defendants and their agency directly
20 involved and Plaintiff who believes and experience to date damages and suffering
21 caused by and from these individuals who represents this agency. Plaintiff suffered
22 monetary loss and long term bodily injuries to date, Plaintiff has no medical insurance
23 coverage and could not afford to sustain longer damages through government
24 process. This case should never happen and due to ego and power of employees
25 forced this case to go to court.
26
27
28

COMPLAINT FOR DAMAGES
UNLIMITED CIVIL CASE

1. FULL NAME: Barbara MASON, Claimant

2. MAILING & CONTACT INFORMATION PLAINTIFF'S ADDRESS:

a. P. O. Box 285, Oakland, CA 94604;

DATE OF INCIDENT: JUNE 2013 Caused damages and injuries

3. **EMPLOYEES RESPONSIBLE** FOR ALL DAMAGES INCURRED BY SECURITAS SECURITY: **HAROLD BONTON**, BLACK OVERWEIGHT BIG MAN responsible for all Injuries & Damages incurred to plaintiff who suffered extreme massive body damages; who was personally informed prior to being handcuffed that plaintiff was only visiting her mother on the 9th floor and did not cause any disturbances, or and never created any threats or performed any threaten acts to these police officers, since being Black knows that she would be a victim of harsh treatments or even killed by these police, such as the same from the case of Trey Van Martin. Plaintiff kept, still this did not work at all she was physically hurt and damages in all parts of her body a 90 pound thin bone Black female

4. **EMPLOYEE JOE SAP**....CORRECT spelling of last name is uncertain and he refused to supply later to plaintiff when she returned for details, she was denied by and with the support of his co-workers., Plaintiff was denied copy of the IR 103 supplemental report on the date of occurrence. This employee was the one giving the orders to ruff plaintiff up and handcuff her without any cause, even the workers who witness his demands and the wrongful treatment of Plaintiff, stated "this was not necessary and there were no caused for such hardness and roughness taken against Plaintiff, who was quiet and submissive during the entire event. The same as Oscar Grant, who was sitting docile and quiet, yet police hit him in the face and killed him in the back. {Plaintiff who believed same would happen to her} only because she was Black, and voiced this to employee Joe Sap. He would have never done such at another race, but believed he could get away because plaintiff was Black and dump that nothing would ever happen to him because this country justice is against Blacks.

1 5. **EMPLOYEE KUNUKE**, there was also description of a tall very tall Asian male
2 who was involved with this racial harassment who personally spoken with
3 Plaintiff's mother and was physically along with verbal information and being
4 informed that Plaintiff Barbara is her daughter, prior to Plaintiff being taken and
5 ruffling handcuffed. Robert..... Check 5-employees involved on summary &
6 Investigation Report Numbers 103 and 104.

7 **6. EMPLOYEE INVOLVEMENT**

- 8 a. **ROBERT FOSTER** contact Tele: information: (925) 324-2135, Position
9 title Supervisor/Security, have been informed and aware of damages
10 Plaintiff suffered on the date of incident. Who also refused to supply
11 Plaintiff with copies of I.R. 103 report even though it involved Plaintiff
12 personally who was being denied three times.
- 13 b. **PATIENT** relationship mother to Plaintiff who suffered lies told by
14 defendants and damages suffered to personal reputation and slanderous
15 acts of embarrassment to her reputation and character as well as her state
16 of mind and physically pains suffered emergency acts against her
17 without probable cause of any evidence of dangerous or threaten acts
18 caused by Plaintiff at any time during this malicious acts taken against
19 her.
- 20 c. **PLAINTIFF SUFFERED** pains for over four (4) + forced to stand in
21 attention without any relief for a prolong time, handcuffed too tight and
22 causing exclusion pains through hours while waiting for the Oakland
23 Police to arrest her and transfer her to jail.
- 24 d. **ROOM 922B** Plaintiff's mother was admitted, from 12:15 p.m. on after
25 Officer approach Plaintiff's mother questioning whether she had a Power
26 of Attorney and designation of her funds information, at this time
27 Plaintiff knew hard force would be placed upon Plaintiff. From this
28 stated time to present to day, her mother has had a heart attack and now
needed assistance in breathing, her health has gone negative due to the
action of defendants.

- 1 7. DAMAGES: Hardship, emotional damages, pains, injuries, are continuing to
2 date and anticipated in the future. This claim is an unlimited civil case. Total
3 amount explanation computations for total amount undetermined yet injuries
4 ongoing to date and expect to have in the future. Expenses expected to continue
5 to have in the future. Body out of alignment, hip pains, right nerve
6 uncontrollable shaking, right shoulder pains, back and upper shoulder pains,
7 swelling behind left knee, front knee damages and pains incurred due to men
8 twisting, pulling, throwing forcing down 90 pound female, who never threaten,
9 caused forced who never acted in any threaten manner. Plaintiff has over
10 twenty witnesses to testify, action taken against her was never necessary.
11
- 12 8. DESCRIBE SPECIFIC: Thrown down with great force by four men, while
13 one applied pressures against the body within unnatural way and forcing the
14 body, bones and muscles at great massive levels to be twisted, turned against the
15 natural and normal process for the body to retain and have control of it regular
16 position or position without tears, pulls, or extreme forcing against natural body
17 positions.
18
- 19 9. DESCRIBE DETAILS: Plaintiff, personally informed Black Security
20 personnel by introducing herself to him and giving him details concerning my
21 name is Barbara and I am here visiting my mother in this room. Prior to being
22 attacked, wrestled and handcuffed, as Plaintiff looked up at this Black man, she
23 said to him You know the TRUTH, facts, and what is right DON'T allowed this
24 to be done to me. This Black security man looked at Plaintiff and remarked with
25 replied, 'IT DOE NOT MATTER.'" PLAINTIFF, being Afro-American female,
26 knew from history, this Black man was going to support any wrongs done by
27 these racist non-Black members. In addition for support of this unnecessary
28

roughness, Plaintiff also watch as their tall ASIAN Male walked into the patient's room belonging to Plaintiff's mother and he personally asked the patient who was lying in her bed on the ninth floor, "WHO IS THIS WOMAN", the patient replied, SHE IS MY DAUGHTER. All before Plaintiff was handcuffed two of their own officers knew the facts and truth, but after their knowledge plaintiff was handcuffed and taken away and charged with trespassing on the Kaiser Foundation Hospital-Oakland. Why was this done So, Plaintiff would be taught a lesson as was personally stated to Plaintiff by and from Lead Supervisor Joe Sap....., Facts knowledge was given prior to being wrestled down to the floor and body forcible twisted, secondly, Plaintiff never resisted in any form or manner, knowing how cops are with Blacks and their injustices, lies and cover-ups, Plaintiff kept extremely calm.

10. AGENT IS RESPONSIBLE: Knowledge and onsite, training and orientation teaching done by agencies that are responsible for their employees' knowledge, insights, actions, which used extreme force when not required, necessary or threaten.

11. CLAIMANT'S CLAIM: All expenses incurred to date and future doctors and corrective visits, loss of wages and additional general damages sustained currently and continued to the future due to time heading and long termed damaged, any future medical expenses. These claims are based upon injuries, damages and/losses. This claim is made on behalf of Plaintiff who's identified as the daughter of Kaiser Permanente Hospital patient in room 912A.

12. The following day, Plaintiff mother was taken to ICU, Plaintiff believes patient condition worsen due to the crisis her daughter suffered by defendants.

13. **WITNESSES IN CASE:** Name: Valerie Farrell, RN, BSN

Position Title: Assistant Nurse Manager

Physical Location: 3rd Floor, ICU/TCU

Building: Kaiser Foundation Hospital, 280 W.
MacArthur Blvd, #3022, Oakland, California 94611.

Name: Myrna A. Concepcion, RN

Position Title: Assistant Nurse Manager

Physical Location: 9th Floor,

Medical/Surgical/Telemetry/Stroke

Building: Kaiser Foundation Hospital,
280 W. MacArthur Blvd, Oakland, California 94611.

Name: James (Jim) Hopkins, RN

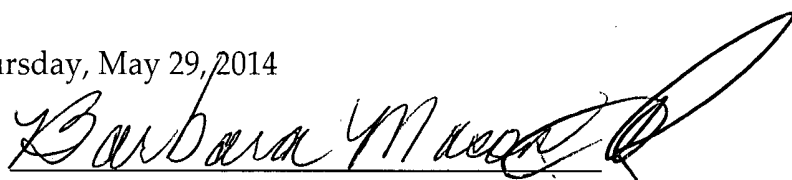
Position Title: Assistant Nurse Manager

Physical Location: Intensive Care and Transitional
Care Unit

Building: Kaiser Foundation Hospital,
280 W. MacArthur Blvd, Suite 3022
Oakland, California 94611.

Cc: Victim Compensation and Government Claims Board @
630 K Street, Sacramento, California

DATED: Thursday, May 29, 2014


Claimant, in the above described case

Plaintiff, Barbara MASON

COMPLAINT FOR DAMAGES
UNLIMITED CIVIL CASE

SHERIFF OF ALAMEDA COUNTY TO
SERVICE DEFENDANTS

CASE TITLED:

MASON VS. SECURITAS
SECURITY AND KAISER
HOSPITAL DOES 1-10
INCLUSIVE