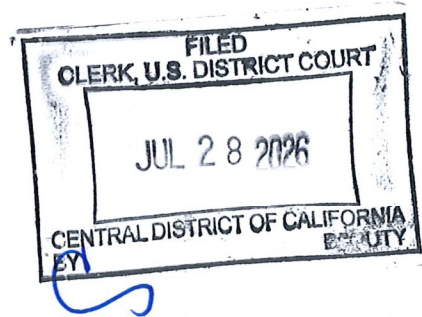


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UNITED STATES DISTRICT COURT *for the* CENTRAL
DISTRICT OF CALIFORNIA, *Western Division*

CV26-8508-KK-KES

ADAM JOHN MACKINTOSH,

Plaintiff,

v.

CALIFORNIA GOVERNOR
GAVIN CHRISTOPHER NEWSOM,
LOS ANGELES MAYOR
KAREN RUTH BASS,
CITY OF LOS ANGELES,
LOS ANGELES POLICE
DEPARTMENT,
CITY OF BURBANK,
STEVE GORDON,
POLICE OFFICER CARRILLO,
POLICE OFFICER JOSEPH,
POLICE OFFICER TERZIAN,
POLICE OFFICER SHUBUNKA,
POLICE OFFICER CUILLARD,
GIRARD PETERSON, INC.,
AND DOE DEFENDANTS 1 – 130,
Defendants.

RACKETEERING,
PUBLIC CORRUPTION,
AND CIVIL RIGHTS
COMPLAINT FOR DAMAGES
AND EQUITABLE RELIEF

Case No.

DEMAND FOR JURY TRIAL

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1 Plaintiff Adam John Mackintosh for his Complaint against
2 the Defendants listed below alleges:

3 **I. INTRODUCTION**

4 1. A license plate frame and a registration sticker. That is what
5 Defendants say this case is about — a piece of plastic and a sticker that
6 officers could read aloud and verify from a few feet away. Over the past
7 two years, that alleged license-plate infraction and registration issue have
8 been the stated justification for stopping Mr. Mackintosh four times.

9 2. In the course of those stops, officers shined lights into his eyes;
10 boxed in his car to detain him in a parking lot; surrounded him with as
11 many as six patrol units at a single stop while, across the four stops, at
12 least fourteen officers in all pressed him with interrogation questions after
13 he invoked his right to remain silent; searched his car and person after he
14 invoked his right to be free from unreasonable searches and seizures;
15 twisted his arms, permanently injuring his right shoulder; kicked his left
16 leg out from under him so he lost balance to push him to the ground, while
17 handcuffed in pain, asking for help up; slammed his body against a parked
18 car; bound his wrists in handcuffs so tight they blistered his skin —
19 blisters that later broke open into a gash, bled, became infected, and are
20 now forming a permanent scar; kept their hands on their holstered firearms
21 as though a movement from a seated man could justify deadly force —
22 and, at the fourth stop, one officer went further, unstrapping his holster
23 clip to grip his loaded firearm over a parking-lot conversation; strip-
24 searched him in a jail for remaining silent, then used the booking and
25 cataloging process to continue searching his belongings until they found
26 debit cards from a joint account he shares with his wife, and accused him
27 of identity theft for carrying those cards, and later dropped the charge;
28 seized his dog; and took the one thing he cannot live without: his car.

1 3. Mr. Mackintosh did not always live in his car. He had a
2 home and a full-time job that paid for it. During that employment,
3 he was investigating matters connected to a federal criminal
4 investigation into Uber Technologies, Inc. (“Uber”) and related parties
5 after he and his wife discovered the Jacobs Letter in a Google search.
6 Mr. Mackintosh is a witness to the alleged Uber crimes. Then in the course
7 of his investigation to build his case against Uber for trade secret and
8 intellectual property theft, his employment was terminated — a
9 termination shielded by California’s “*at-will*” doctrine, leaving him
10 no remedy at law even if he contested it — causing his income to
11 fall to zero. This event caused him to rebuild the only way available to
12 him at the time: working from his car, first working from it, and
13 eventually — as the fines, penalties, fees, and holds described
14 below mounted — living in it. By the time of the stops at issue, the car
15 was his home, his office and place of business, and his livelihood.
16 He slept in it. He earned his income from it, assisting seniors, hospital
17 patients, the disabled, retirees, and other customers at \$50 to \$275 a day.
18 He stored in it the records of his pending federal litigation and the
19 materials he maintains as a witness in the federal investigation.
20 When Defendants took the car, they did not merely impound a
21 vehicle — they took the last thing standing between a working man
22 and the street, ended his entire income, again, and separated him from
23 effects he needs to pursue justice.

24 4. The stops themselves tell a story no citation can explain.
25 At the second stop, Mr. Mackintosh handed the officer the citation from
26 the first stop — written proof that the identical alleged condition had
27 already been cited and that his plate was legible. The officer read it and
28 cited him again anyway. At the fourth stop, before any officer had said a

1 word to him, the patrol car's dashboard computer already displayed driver
2 license information, his name, vehicle, finance company, and Department
3 of Motor Vehicles ("DMV") records, with an "extracted delinquency
4 alert" displaying. Mr. Mackintosh was not encountered. He was located.

5 5. What followed each stop was not punishment fixed by any
6 court. It was a scheme designed to take money — a system in which a
7 single traffic stop sets off penalties, registration holds, towing, storage,
8 and collections, each step generating a new charge (the "Scheme").
9 Each citation generated fees and penalties; the penalties triggered
10 DMV late fees and holds; the holds brought serious demands from
11 collection authorities at the California Franchise Tax Board ("FTB"),
12 threatening wage garnishment and bank levies and enclosing DMV
13 vehicle release forms; and the impound produced fees that grew by the
14 day — timed across a weekend when the one office that could authorize
15 the release of the car — the Burbank, California, DMV office, within a
16 reasonable walking distance of the impound lot — was closed. The
17 Beverly Hills traffic court also demanded \$1,580 from Mr. Mackintosh
18 before it would let him contest the citations at all. Pay first, be heard later,
19 if ever. At every step, the price of the alleged infraction grew further from
20 anything a sticker and frame could justify, and the Scheme taking his
21 money never once required proof that Mr. Mackintosh had done anything
22 wrong. Even the "expired registration" at the center of the fourth stop is
23 the Scheme's own product: as alleged, registration cannot be completed
24 because the vehicle carries a catalytic converter — bearing a serial number
25 that does not match the vehicle — welded on before Mr. Mackintosh
26 purchased the car, a substitution omitted from every sale and finance
27 document, and because the Scheme itself stripped the cash he was saving
28 up to repair it, a staggering \$3,600 cost (§§ 60A, 76A).

1 6. This was not ordinary traffic enforcement gone wrong four
2 separate times, even if there were calls made for service or other reasons
3 used as a pretext. Mr. Mackintosh is a witness who has provided
4 information relating to a federal criminal investigation into Uber.
5 He has also petitioned the California Governor through his office and
6 the Mayor of Los Angeles through her office in writing about the
7 very fine-and-fee Scheme practices used against him during his
8 investigation. He has declared in open federal court that he would
9 “litigate his claims from his car if he has to.” Persons within
10 government agencies and departments — sued here as DOE
11 Defendants until proper discovery reveals their true names — knew of
12 his claims, key witness role, and located him through database queries
13 and other digital forms of camera and sensor surveillance and tracking
14 before officers ever approached him, and directed and carried out the
15 repeated, escalating stops against the car that houses his evidence and
16 litigation materials, in retaliation for his protected activity and to
17 hinder his pursuit of his claims in a court of law by exacting his
18 financial resources.

19 7. Mr. Mackintosh therefore brings this civil action under the
20 federal Racketeer Influenced and Corrupt Organizations Act of 1970,
21 18 U.S.C. §§ 1961–1968; the Civil Rights Act of 1871, 42 U.S.C. § 1983;
22 among others, and supplemental California tort and civil-rights law,
23 seeking treble damages for the income and property taken from him,
24 compensation for the injuries inflicted on his body, the return of his money
25 and property, and a judgment declaring that a man, woman or family with
26 children may not be fined, beaten, jailed, and dispossessed of their home
27 over a disputed registration, citations and a license plate frame officers
28 could read from where they stood.

1 **II. PARTIES AND RELEVANT NON-PARTIES**

2 **Plaintiff:**

3 8. Plaintiff Adam John Mackintosh is an individual residing in
4 Los Angeles County in California. At all relevant times to this action
5 his vehicle turned into his workplace, and ultimately his home,
6 and the repository of his business records and litigation files related
7 to *Waymo v. Uber Technologies, Inc., et al.* (the “*Waymo*” case),
8 case number 3:17-cv-00939, filed in the United States District Court
9 for the Northern District of California, San Francisco, a high-profile 2017
10 trade secret theft case. The files Mr. Mackintosh possesses are highly
11 relevant and crucial to an ongoing federal criminal investigative order
12 signed by William H. Alsup, the federal district court judge who presides
13 over the criminal investigation and presided over the *Waymo* case.

14 **RICO Defendants**

15 9. The Defendants identified in ¶¶ 10–16 performed the searches,
16 the tracking, state-wide surveillance through ALPRs and FLOCKS,
17 all stops, citations filed in various courts through agency practices and
18 systems, attempted arrests and arrest, seizures, holds, assessments,
19 towing, storage, and fcc collection as alleged, and are referred to herein
20 as the “RICO Defendants.” Each RICO Defendant, whether a
21 natural person or a legal entity, is a “person” within the meaning of
22 18 U.S.C. §§ 1961(3) and 1962(c).

23 10. Defendant Officer Carrillo, Badge No. 379, is a police officer
24 employed by the University of California Police Department (“UCPD”),
25 and a person defined under 18 U.S.C. § 1961(3). UCPD is the police
26 department of the University of California, whose officers exercise peace-
27 officer authority under California law and operate in coordination with the
28 Los Angeles Police Department (“LAPD”) in the areas surrounding

1 UCLA pursuant to interagency agreements, shared dispatch and database
2 systems, and mutual-aid protocols.

3 11. Defendant Officer Joseph, Badge No. 375, is a police officer
4 employed by the UCPD. He is sued in his individual capacity. Doe Officer
5 1 is his female partner, whose name is unknown to Mr. Mackintosh.

6 12. Defendant Officers Terzian, Badge No. 24918, and Officer
7 Shubunka, Badge No. 22310, are police officers employed by the
8 Glendale Police Department (“GPD”). They are sued in their individual
9 capacities.

10 13. Defendant Officer Cuillard, Badge No. 15652, is a police
11 officer employed by the City of Burbank Police Department (“BPD”).
12 He is sued in his individual capacity. Doe Officer 2 is his partner.

13 14. Defendant Girard Peterson, Inc., is a privately operated motor
14 vehicle carrier, specifically, it is a corporation registered with the DMV
15 as a “motor vehicle carrier of property,” under California Vehicle Code
16 § 34601, that took possession of Mr. Mackintosh’s vehicle on July 10,
17 2026, without his consent, under Officer Cuillard’s order, and conditioned
18 its release on daily and accumulating fees and demanded payment.

19 15. Doe Officers 3 through 10 are the unidentified officers who
20 participated in the stops described below.

21 16. Does 11 through 20 are government-agency officials or
22 employees who, as alleged in ¶¶ 65 and 84–96 *infra*, queried Mr.
23 Mackintosh’s records, directed or coordinated the stops, or communicated
24 among agencies concerning him, or ratified a system that did so. Their
25 identities are peculiarly within Defendants’ knowledge. Mr. Mackintosh
26 will amend this Complaint to state their true names when ascertained.

27 **Co-Conspirator Defendants (Public Officials and Entities)**

28 17. Defendant Gavin Christopher Newsom is the Governor of

1 California and is a “person” within the meaning of 18 U.S.C. § 1961(3),
2 and is sued in his individual capacity. Mr. Mackintosh mailed legal
3 demands to Newsom’s office around April 2024 describing the Scheme of
4 fine-and-fee practices that push American Citizens into homelessness.

5 18. Defendant Karen Ruth Bass is the Mayor of the City of Los
6 Angeles and is a “person” within the meaning of 18 U.S.C. § 1961(3), and
7 is sued in her individual capacity. Mr. Mackintosh mailed written
8 demands to her office around April 2024 describing the Scheme of fine-
9 and-fee practices that push American Citizens into homelessness.

10 19. Defendant City of Los Angeles is a municipal corporation and
11 a legal entity within the meaning of 18 U.S.C. § 1961(4).

12 20. Defendant City of Burbank is a municipal corporation and a
13 legal entity within the meaning of 18 U.S.C. § 1961(4). It is the employer
14 of Defendant Officer Cuillard and Doe Officer 2.

15 21. Defendant Steve Gordon is the Director of the California
16 DMV, he is sued in his official capacity for prospective declaratory and
17 injunctive relief. As alleged below, the DMV, acting under the Director’s
18 leadership, attached citation amounts, including Los Angeles Department
19 of Transportation (“LADOT”) amounts, to Mr. Mackintosh’s vehicle
20 registration, imposed registration holds, seized his vehicle, is continuing
21 to obstruct him from earning income, and mailed payment demands to
22 him. The Director is the state officer with authority to release the
23 registration hold and to end the ongoing enforcement practices described
24 herein, and he has allowed and permitted those practices to continue.

25 22. Defendant LAPD is a legal entity within the meaning of
26 18 U.S.C. § 1961(4). LAPD is sued because its communications, CAD,
27 ALPR, and database systems were used to query, locate, and coordinate
28 the enforcement against you (¶¶ 65, 86, 90, 112), and because the third

1 stop's multi-unit response occurred within its jurisdiction.

2 23. Does 21 through 130 are additional persons and entities whose
3 acts or agreements furthered the conduct alleged below, including persons
4 who transmitted directives concerning Mr. Mackintosh through a
5 chain-of-command structure and interagency communications.

6 **Relevant Non-Parties**

7 24. LADOT, the San Francisco Municipal Transportation Agency
8 (“SFMTA”), the FTB, the Superior Court of California traffic divisions,
9 and the University of California, Los Angeles dispute-resolution office
10 (the “UCCD”) are non-party agencies and offices whose acts are described
11 in this Complaint, including the issuance and collection of citation
12 amounts using the traffic courts, FTB and other government and agency
13 departments, the mailing of payment demands and collection threats, the
14 imposition of pay-first preconditions to contesting citations, and the
15 exoneration of officers without meaningful investigation through proper
16 authority. The dealership that sold Mr. Mackintosh the vehicle and the
17 finance company that holds the conditional sale contract, CarMax and
18 CarMax Auto Finance, are also relevant non-parties: as alleged in ¶ 60A,
19 they sold and financed the vehicle with an undisclosed, non-conforming
20 catalytic converter that now prevents the vehicle from passing a required
21 California SMOG inspection to complete registration. Mr. Mackintosh is
22 pursuing separate remedies against them; they are referenced here because
23 their concealment created the registration condition that Defendants
24 seized upon. Specifically, the catalytic converter has a stamped serial
25 number D-193-134, whereas the serial number for the date range of the
26 make, model and year of his car should be between serial numbers 151
27 and 152, as listed on California Air Resources Board’s website as
28 permitted catalytic converters.

1 **III. SUBJECT MATTER JURISDICTION AND VENUE**

2 25. This Court has federal-question jurisdiction under 28 U.S.C.
3 §§ 1331 and 1343(a)(3)–(4) and 18 U.S.C. § 1964(c) over the RICO
4 claims, which arise under 18 U.S.C. § 1961 et seq., and over the claims
5 under 42 U.S.C. §§ 1983, 1985, and 1986. The Court has supplemental
6 jurisdiction under 28 U.S.C. § 1367 over the state-law claims, which arise
7 out of the same incidents and form part of the same case or controversy
8 under a common nucleus of operative facts. The Court is authorized to
9 grant the declaratory relief sought herein under 28 U.S.C. §§ 2201 and
10 2202.

11 26. Venue is proper in this District under 28 U.S.C. § 1391(b),
12 because a substantial part of the events giving rise to the claims occurred
13 in Los Angeles County, California, within this District, and under
14 18 U.S.C. § 1965(a), because each Defendant resides, is found, has an
15 agent, or transacts his, her, or its affairs in this District.

16 **IV. PERSONAL JURISDICTION**

17 27. Exercise of personal jurisdiction over each of the
18 Defendants is reasonable and proper in this District. Each individual
19 Defendant resides in, is employed in, and performed the acts
20 alleged herein in California, and a substantial part of those
21 acts occurred within this District. Each entity Defendant is organized
22 under the laws of California, maintains its principal place of
23 business in California, or is a California public entity, and
24 each transacted the affairs alleged herein within this District.
25 For Mr. Mackintosh’s claims under 18 U.S.C. § 1962, jurisdiction
26 over the Defendants is additionally proper under 18 U.S.C. § 1965(a)–(b),
27 and the ends of justice require that all Defendants be brought before
28 this Court in a single action.

1 **V. FACTUAL BASIS FOR CLAIMS**

2 **A. Plaintiff's witness status and protected activity**

3 28. Mr. Mackintosh is a percipient and prospective witness with
4 respect to a federal criminal investigation in the *Waymo* case and trial
5 evidence filed in federal court. So is his wife, who was present for and
6 observed the forensic evidence described in ¶ 29 as it was discovered by
7 Mr. Mackintosh. No subpoena, court order, formal designation, or motion
8 by the Department of Justice ("DOJ") is required to make a person a
9 witness for purposes of the federal witness-protection statutes; those
10 statutes protect any person who holds information concerning the
11 commission or possible commission of a federal offense and who might
12 communicate it to federal officers (¶ 116).

13 29. Between approximately 2017 and 2019, Mr. Mackintosh was
14 building a company in the healthcare and rideshare space to give him entry
15 into the artificial-intelligence sector to lower healthcare costs for
16 seniors, the disabled, and patients. During these years, he witnessed
17 first-hand software functionalities that were under investigation by the
18 DOJ, including its National Security and Intellectual Property Theft
19 sections, in connection with the *Waymo* case: "Apple-Provided Software,"
20 "Screen Captures," "API Payload Intercepts containing his intellectual
21 property transmitted to Uber, Apple and other corporations from
22 Mr. Mackintosh's systems" and "iPhone Mirroring prior to Apple
23 releasing a Mirroring Feature," among others, without his knowledge.
24 Mr. Mackintosh's wife was present when he discovered a
25 "Screen Capture" of that kind on his own system, and she observed it on
26 the screen as he found it. She is therefore a percipient witness to the same
27 functionalities and forensic evidence, and their communications about
28 these matters are the communications carried on the devices searched and

1 seized in ¶ 62A. When DOJ agents investigated and lawfully interviewed
2 Uber employees, their attorneys, and others, those witnesses denied any
3 knowledge of it. When Judge Alsup ordered a pre-trial hearing concerning
4 the Jacobs Letter in December 2017 and asked each defendant to raise his
5 right hand and swear under oath to tell the truth, they asserted that the
6 companies involved in that letter were offshore companies — statements
7 contradicted by the software functionalities and forensic evidence found
8 in Mr. Mackintosh's systems, at his American company.

9 30. Mr. Mackintosh and his wife did not learn of the Jacobs Letter
10 itself until after 2017, when it had been filed in the Waymo case without
11 their knowledge; by then he had been investigating the software
12 functionalities described in ¶ 29 for a considerable period, and the
13 Jacobs Letter confirmed what his own systems had already shown him.
14 In the years before filing his own lawsuit, he gathered that evidence and
15 stored it in secured, encrypted containers and storage devices, among
16 other protected places. During that litigation, he filed a single piece of
17 forensic evidence — a “Screen Capture” of the kind described in the
18 Jacobs Letter. The Jacobs Letter was a key piece of evidence provided to
19 Judge Alsup during the Waymo trial that prompted the criminal referral
20 for investigation to the U.S. Attorney. See *Waymo* case, Docket Entry 428,
21 “Order of Referral to United States Attorney.”

22 31. After he filed that single piece of forensic evidence to
23 challenge screen-capture evidence offered by Apple’s attorneys — which
24 was a screenshot, not the underlying forensic evidence — the presiding
25 judge dismissed the case as wholly frivolous under Rule 12(b)(1), rather
26 than under Rule 12(b)(6) as Apple had requested.

27 32. Despite the dismissal, Mr. Mackintosh maintains the evidence
28 in additional physical and documentary form, preserved in sealed bags and

1 storage devices kept in his vehicle, together with his litigation files, which
2 include material prepared and handled under attorney-client privilege.
3 There is a reasonable likelihood that, absent the interference caused by the
4 four stops described below, he would communicate — and would continue
5 to communicate — information concerning the commission or possible
6 commission of federal offenses to federal law-enforcement officers in the
7 DOJ, including its National Security and Intellectual Property Theft
8 sections, and to federal judges, including through his court filings and his
9 prosecution of his claims.

10 33. Defendants had knowledge, communication and other
11 information of Mr. Mackintosh’s witness role and of his contemplated
12 state and federal proceedings. Among other facts pled: (a) during
13 the July 10, 2026 stop, and before his arrest, Mr. Mackintosh told Officer
14 Cuillard that he possessed a drafted RICO complaint for an impending
15 lawsuit, told the officers that their conduct was racketeering, and told
16 them that by seizing him they were going to ruin his life, and that they had
17 been dispatched through their chain-of-command to do it (§§ 60, 68–69,
18 95); (b) the officers nonetheless searched his vehicle and located,
19 unsealed, opened, and handled sealed anti-static, anti-RFID evidence-
20 preservation Faraday bags — packaging of the kind used specifically to
21 preserve electronic and forensic evidence, routinely used by government
22 agencies and their departments to seal evidence during investigations, and
23 recognizable as such on sight (§§ 62A–63); and (c) Mr. Mackintosh stated
24 in federal court in the *Mackintosh v. Cook*, case number 2:24-cv-05854
25 (C.D. Cal.) (the “*Mackintosh*” case), that he would “litigate from his car
26 if necessary” — a statement he made because, by the time he made it,
27 the citations, registration holds, and related exactions described in
28 §§ 35–35C and 77–83 were interfering with and consuming the money that

1 kept him housed, and litigating from his car was ceasing to be a figure of
2 speech and becoming his only remaining option.

3 34. The seizure and retention of Mr. Mackintosh's vehicle
4 deprived him of custody of the described evidence and litigation materials.
5 Any loss, destruction, or disposal of the vehicle's contents while his car
6 was impounded would destroy evidence relevant to a federal investigation
7 and to pending and contemplated court proceedings.

8 35. The takings began in 2017. While Mr. Mackintosh was
9 investigating the matters described above, parking enforcement began
10 citing his Dodge Ram truck; it then followed him continuously — before,
11 during, and after the *Mackintosh* case — and towed and seized the truck,
12 which he had purchased for approximately \$30,000, together with other
13 property. The cumulative acts eventually prompted Mr. Mackintosh to
14 send written legal demand letters to the Office of the Governor and the
15 Office of the Mayor of Los Angeles concerning escalating parking
16 citations and fine practices that were draining, and continuing to attempt
17 to drain money from his bank accounts and other valuable resources. In
18 those demands, Mr. Mackintosh asserted that continuous parking citations
19 and related practices in California contribute to the homelessness crisis.
20 He gathered and preserved the evidence, and attached to those demands
21 parts of the evidence showing admissions from the LADOT stating that
22 "if you are experiencing homelessness," a program is available — an
23 acknowledgment that LADOT parking enforcement cites homeless people
24 who live in their cars. Mr. Mackintosh conveyed in those demands that
25 citing vehicles belonging to homeless people leads to unjust fines, DMV
26 holds, police citations, and impoundments, and ultimately displaces
27 people onto the streets. Mr. Mackintosh also mailed written notice to the
28 Office of the Los Angeles City Attorney asserting that the parking-citation

1 practices — including street-sweeping citations issued on streets where,
2 as he observed and documented, no sweeper appeared or no sweeping
3 occurred — take money from residents automatically and operate as
4 extortion and forced labor in violation of the federal racketeering laws,
5 and that continued enforcement of those practices against him and others
6 would compound the violations as alleged in section I, *infra*.

7 35A. The four stops did not arise from a drastic change in
8 Mr. Mackintosh's driving; they arose from a change in his activity. A
9 before-and-after comparison of his own citation history, documented in
10 exhibits, shows the shift. In the approximately twenty-one years (roughly
11 8,000 days) before Mr. Mackintosh began investigating and litigating the
12 matters described in this Complaint, his truck and car were cited
13 approximately one to three times in total, with combined fines of
14 approximately \$600. In the approximately three years (roughly 1,100
15 days) during and after his investigation and litigation against Uber,
16 Apple, and related parties, his truck and cars were cited and towed
17 approximately sixteen to eighteen times, with combined fines, fees, and
18 costs of approximately \$7,000 to \$9,000 or more. Even on the most
19 conservative reading of those figures — three citations in twenty-one
20 years versus sixteen to eighteen — the annual rate at which Mr.
21 Mackintosh was cited increased at least fifteen-fold, an increase of
22 approximately 1,400 percent; using the midpoints of the ranges, the
23 citation rate increased nearly thirty-fold. The annual rate of fines and fees
24 extracted from him rose even more dramatically — from roughly \$28 per
25 year across the first period to more than \$2,300 per year in the second, on
26 the figures above — as seen in each of the attached exhibits. This
27 documented escalation — beginning with his protected activity and
28 accelerating after each protected act, including closing in on filing his

lawsuit — supports the inference that the citations and stops were directed at him through the surveillance, database, and license-plate-reader systems, not limited to FLOCK surveillance, as alleged herein (¶¶ 65, 86, 90), that on the surface appear to be isolated enforcement events.

35B. The geography of the encounters points the same direction. On information and belief, the SFMTA employs approximately 370 parking-enforcement officers to cover San Francisco’s approximately 46.9 square miles — on the order of 1.3 billion square feet, or roughly one officer for every 3.5 million square feet at any given moment — by Mr. Mackintosh’s estimate, roughly a 1-in-5,000 (0.02%) chance of any given officer encountering him at a given time. The City of Los Angeles spans approximately 469 square miles, roughly ten times that area. Yet in both cities, wherever Mr. Mackintosh drove and parked, parking enforcement and San Francisco Police Officers located his particular vehicle again and again — following him in every area he drove and parked (¶ 77) — an outcome whose likelihood by undirected chance is vanishingly small, and which is instead consistent with vehicle-specific location through the automated license-plate-reader, CAD, and database systems alleged herein (¶¶ 65, 86, 90). The scan logs, query histories, and dispatch records of those systems will show how his vehicle was found, and by whom.

35C. The chronology is a chain, and each link was forged by the one before it. In 2017, the citing, towing, and seizure of Mr. Mackintosh’s truck began — during, and on the facts above because of, his investigation into the Uber matters described above (¶¶ 28–30, 35). In October 2019, his employment was terminated and his income fell to zero (¶¶ 72–73). Deprived of his truck, his job, and then his home, he later moved into his vehicle to work and to live (¶ 74) — and living and working from a vehicle

1 placed him squarely and continuously in the path of the Scheme's
2 street-level enforcement: the San Francisco citations and impound (§ 77),
3 the DMV's attachment of citation amounts to his registration (§ 82A), the
4 four stops of 2024 through 2026 (§§ 36–71), and, finally, the July 2026
5 seizure of the vehicle itself — his last remaining shelter, workplace, and
6 repository of evidence. Each deprivation manufactured the vulnerability
7 that the next deprivation exploited, culminating in the roughly 1,100-day
8 period of acute enforcement measured in § 35A. The harm has therefore
9 been continuous and compounding from 2017 to the present: a decade in
10 which the Scheme progressively stripped Mr. Mackintosh of his truck, his
11 employment, his home, his savings, his safety, the stability of his marriage
12 (§ 77A), and ultimately the car that held what remained of his life and his
13 evidence. That decade-long arc is the injury period alleged in §§ 118–119
14 and in the Prayer for Relief.

15 35D. Three further events belong to that chain, and potentially
16 others related to the Scheme. First, in 2019, while Mr. Mackintosh
17 continued his investigation into the Jacobs Letter matters, a police officer
18 entered his home and his room within minutes of his roommate arriving
19 home. The officer attempted to arrest him, purportedly on an allegation of
20 assault, while he peacefully sat at his desk behind an iMac computer, with
21 his best friend who's a witness — and while his wife sat on their bed
22 texting her best friends; no arrest was made, because Mr. Mackintosh was
23 seated, calm, and had assaulted no one. Second, within approximately
24 four weeks of Mr. Mackintosh filing his complaint concerning the Jacobs
25 Letter matters — a complaint to which he attached the Jacobs Letter
26 itself — his mother passed away suddenly following routine back-pain
27 medicine through needle injection — a death that, Mr. Mackintosh
28 was told, Stanford medical doctors deemed medically implausible.

1 Mr. Mackintosh does not attribute her death to any Defendant in this
2 action; he pleads the loss and its timing because he has carried it
3 through every event alleged in this Complaint, because the exactions
4 alleged herein consumed the time, money, and records he would have used
5 to seek answers about her death and the timing of it, and because enduring
6 the stops, seizures, arrest, and dispossession described herein while
7 grieving her compounded the severe and continuing emotional injuries
8 for which he seeks recovery (Prayer ¶ 1(b)). Third, around the same
9 time — as Mr. Mackintosh’s employment was constructively terminated
10 and he began repeatedly seeing advertisements on his iPhone that he
11 could earn money working from his car as an independent contractor —
12 Defendant Governor Newsom signed an investigative order concerning
13 Chevron Corporation and gasoline pricing. In the period that followed,
14 gasoline prices rose and citations began occurring more often, even in
15 remote areas — and because working from his vehicle required him to
16 continually fuel it, the increase subtly eroded Mr. Mackintosh’s daily
17 income from both directions at once. Across all of these events,
18 Mr. Mackintosh made his circumstances known to the State’s highest
19 offices through channels that create a record: his written legal demands to
20 the Governor that purportedly were relayed to the Attorney General, his
21 court filings in the *Mackintosh* case related to the *Waymo* case, and the
22 police reports and emergency calls he placed. Defendant Newsom and
23 successive California Attorneys General were therefore on notice, through
24 their own files, of both his witness status and the escalating enforcement
25 against him, yet the conduct alleged in this Complaint continued unabated.

26 35E. The surveillance was not abstract; it was visible, recorded,
27 and escalating. Beginning in 2021 — after Mr. Mackintosh filed the
28 Screen Capture evidence described in ¶ 30 in federal court — and

1 continuing to the present, marked and unmarked law-enforcement
2 vehicles from multiple agencies, including police and sheriff's
3 departments, repeatedly located Mr. Mackintosh's vehicle where it was
4 lawfully parked; at night, activated their spotlights and floodlights and
5 shined them directly at him and into his vehicle; idled or circled nearby;
6 and followed him when he relocated. Some encounters also occurred in
7 daylight, and some occurred while his vehicle was in motion, as officers
8 followed or paced him (§§ 132). These encounters recurred across different
9 cities and jurisdictions, escalated in frequency and boldness through the
10 years measured in §§ 35A–35C, and included at least one incident in which
11 a patrol vehicle maneuvered toward Mr. Mackintosh's car in an
12 intersection in a manner that nearly caused a collision. The encounters
13 continued and intensified after Mr. Mackintosh mailed his written legal
14 demands to the offices of Governor Newsom and Mayor Bass in
15 April 2024 (§§ 17–18, 36) — meaning this conduct persisted, and grew
16 bolder, after the State's and the City's highest offices were on written
17 notice of the enforcement campaign against him. Mr. Mackintosh
18 possesses video and photographic recordings of these encounters, with
19 dates and locations, and can produce them to the Court. On information
20 and belief, the officers involved located his parked vehicle through the
21 FLOCK, ALPR, CAD, and database systems alleged in §§ 35A–35B, 65,
22 86, and 90 — systems whose scan and query data flow to the departments
23 involved — and through inquiries made of persons in the vicinity of where
24 he parked. A man's parked car is his home in this case; the sustained
25 location, illumination, and following of it is not traffic enforcement — it
26 is surveillance and intimidation of a witness, and it is part of the retaliation
27 and witness-tampering conduct alleged in §§ 84–96 and 115–116 and the
28 Fifth Claim for Relief.

1 **A1. The enforcement system in context: fines as revenue,**
2 **pretext as method**

3 35.1 Mr. Mackintosh does not challenge California’s traffic-safety
4 laws themselves. He challenges the way those laws were used
5 against him. An interlocking enforcement apparatus — surveillance,
6 tracking, then citations, multiplying penalty assessments, DMV
7 registration holds, pay-first preconditions to any administrative
8 hearing, court-ordered debt collection through the FTB, and
9 impoundment with daily storage fees — was operated against him
10 not as an instrument of safety, but as an instrument of revenue extraction
11 and retaliation. That apparatus, as applied to Mr. Mackintosh, is the
12 Scheme defined in ¶ 5.

13 35.2 The danger that this apparatus would be used
14 this way is not novel, and it is recognized at the highest level.
15 In the case of *Timbs v. Indiana*, 586 U.S. 146 (2019), a
16 unanimous Supreme Court, tracing the Excessive Fines Clause to
17 Magna Carta and the English Bill of Rights, explained why
18 fines demand closer scrutiny than other punishments: fines are
19 a source of revenue for the government and associated
20 corporations and other legal entities that impose them, while
21 other forms of punishment cost the State money, so fines may be
22 employed out of accord with any penal purpose. *Id.* at 153–58
23 (discussing *Harmelin v. Michigan*, 501 U.S. 957, 978 n.9 (1991)).
24 *Pimentel v. City of Los Angeles*, 974 F.3d 917 (9th Cir. 2020), holding
25 that parking fines and late assessments are subject to Eighth Amendment
26 proportionality review.

27 35.3 The federal government has likewise documented, in an
28 official investigative report, how such a system operates when

1 enforcement is driven by revenue: citations generate fines; fines
2 generate assessments, holds, warrants and even arrests; holds make lawful
3 driving impossible; and the inability to pay generates further
4 enforcement — a self-reinforcing repeating pattern of enforcement that
5 falls hardest on the poor and can be directed at chosen individuals.
6 See U.S. Department of Justice, Civil Rights Division, Investigation of
7 the Ferguson Police Department (Mar. 4, 2015). The Scheme operated
8 against Mr. Mackintosh in precisely this way (¶¶ 36–83), and this
9 Complaint is pled with sufficient particularity that the same federal
10 authorities may evaluate the pattern described here should they choose to
11 review it.

12 35.4 Two features of California’s vehicle-enforcement
13 apparatus make it a ready instrument for targeting. First, because
14 an officer may lawfully stop a vehicle upon observing any code
15 violation, *Whren v. United States*, 517 U.S. 806, 813 (1996), a code
16 containing thousands of enforceable conditions places a lawful pretext
17 within arm’s reach of any directed stop; the check on that power is
18 the requirement — enforced through this action — that stops not be
19 conducted in retaliation for protected activity or as part of a scheme
20 of extortion. Second, the integration of automated license-plate
21 readers, surveillance, CAD systems, and interagency databases
22 means that enforcement can be pointed at a specific person in advance, as
23 the “extracted delinquency alert” displayed on Officer Cuillard’s
24 computer before any contact with him demonstrates (¶ 65). The
25 combination — a universal pretext, plus person-specific targeting data,
26 plus a Scheme that runs automatically once triggered — is the Enterprise’s
27 method of commission alleged in ¶ 96 and in the First and Second Claims
28 for Relief.

B. First stop — August 28, 2024 (Officer Carrillo)

36. After Mr. Mackintosh mailed the legal demands to both Newsom and Bass’s offices in April 2024 through certified United States Postal Service (“USPS”), and after the *Mackintosh* case was obstructed in the same district in July 2024, on August 28, 2024, Officer Carrillo and a supervising officer of the UCPD under LAPD’s jurisdiction, policies, and directives, stopped Mr. Mackintosh’s vehicle, stating the reason for the stop was an “obstructed license plate” that could be read at a horizontal view, but was not visible at a heightened angle.

37. Both officers were able to read Mr. Mackintosh’s license plate numbers at close proximity, demonstrating the rear license plate was legible.

38. Officer Carrillo continuously shined his flashlight directly into Mr. Mackintosh’s eyes and continued to do so even after Mr. Mackintosh respectfully asked the officer to stop.

39. The officers demanded his driver license and stated that because he was detained, he was required to identify himself. When he declined out of fear for his safety, the officers summoned three to five additional officers, who walked around and inspected the exterior of Mr. Mackintosh’s vehicle.

40. The officers articulated no suspicion of any crime beyond the plate-display allegation, stating only that the plate must be displayed “in case” Mr. Mackintosh “runs a red light,” and potentially because overhead cameras could not read his license plate at an angle.

41. The stop was prolonged beyond the permissible time reasonably necessary to issue a citation for the stated violation.

42. Mr. Mackintosh was cited under California Vehicle Code (“CVC”) §§ 5200 and 5201, and incurred a cumulating fine of \$868.

1 **C. Second stop — January 10, 2025 (Officers Shubunka and**
2 **Terzian)**

3 43. On January 10, 2025, Officers Shubunka and Terzian also
4 stopped Mr. Mackintosh's vehicle, again citing "license plate
5 obstruction," although the plate was visible at close proximity, as shown
6 in the body-camera and photographic records.

7 44. During the stop, both officers repeatedly placed their hands on
8 their holstered firearms and positioned themselves at the front and side
9 windows while Mr. Mackintosh sat in the vehicle. Additional officers
10 were called to the scene without just cause and prolonged the stop.

11 45. Officer Shubunka told him that the CVC violation "is a lower
12 level crime," demanded his driver license, and threatened to arrest him
13 and take him to jail to appear before a judge if he did not identify himself.

14 46. Mr. Mackintosh handed Officer Shubunka the August 28, 2024
15 citation showing he had already been cited for the identical alleged
16 condition, and stated the plate was not covered.

17 47. Officer Shubunka stated that if Mr. Mackintosh let him
18 "verify" that "the name on the citation matches the name on your driver
19 license, I will let you go." In reliance on that statement and under the
20 threat conveyed by the officers' continuously placing their hands on their
21 firearms, he surrendered his license. Officer Shubunka did not return it as
22 stated; Officer Terzian took the license and used it to write a second
23 citation that added additional vehicle code sections to attempt to seize the
24 vehicle, increased his total assessments by approximately \$1,500, and
25 declared the car unsafe for public roads.

26 48. The stop was prolonged well beyond the time reasonably
27 necessary for the stated purpose, an obstructed license plate cover on the
28 rear of the vehicle.

D. Third stop — March 3, 2025 (Officer Joseph and Doe Officer 1)

49. On March 3, 2025, at approximately 11:00 p.m., Officer Joseph positioned his patrol car at an intersection ahead of Mr. Mackintosh's route coming from Beverly Hills, and circled the intersection until Mr. Mackintosh passed, and then he initiated a stop of his vehicle.

50. When Mr. Mackintosh partially opened his driver side door to ask the purpose of the stop and then attempted to close it, Officer Joseph — who is approximately 6'4" and 250 pounds — physically held the door open against Mr. Mackintosh's will and requests. Officer Joseph proceeded to state "you have a license plate cover", which is a "crime."

51. Mr. Mackintosh objected and did not consent to any search or seizure.

52. Officer Joseph told Mr. Mackintosh "you're detained" after Mr. Mackintosh disputed the stop. Officer Joseph and his partner, Doe Officer 1, then proceeded to grab his arms, twisted his back and shoulders while he was seated and restrained by his seatbelt, reached into the vehicle to unbuckle the seatbelt, then pulled him from the vehicle, and handcuffed him with his arms jolted behind his back, causing muscle trauma injuries to his shoulders, back, arms, and wrists.

53. Officer Joseph then kicked Mr. Mackintosh's left leg out from under him, causing him to lose balance, and then pushed him down to the ground to sit in a dark area next to the passenger side of the patrol car, away from the lights and cameras, and threatened to tow the vehicle for expired registration.

1 54. After a prolonged stop, Doe Officer 1 called for backup, and
2 more than eight additional officers arrived in approximately six patrol
3 cars, surrounding him. While he lay handcuffed on the ground repeatedly
4 asking for help up and repeatedly shifting his body because of pain,
5 officers ignored him; Doe Officer 1, instead photographed, and
6 recorded him, and searched the vehicle without a warrant, and
7 without consent, and after Mr. Mackintosh invoked his right to
8 remain free from searches or seizures under the Fourth Amendment
9 to the U.S. Constitution.

10 55. During the stop, several UCLA students, drawn by
11 the patrol-car lights, walked up to the scene and started observing the stop
12 and saw that Officer Joseph kicked Mr. Mackintosh's leg out from
13 under him, in order to shove him to the ground because Mr. Mackintosh
14 wished to remain on his feet, and while he was on the ground in
15 pain and asking for help up, the UCLA students were concerned
16 and began recording the incident. The officers immediately threatened
17 them, demanded that they stop recording, and ordered them to keep
18 walking.

19 56. No arrest was made that night. Mr. Mackintosh was
20 issued a third citation. A supervising officer arrived, conferred with
21 Officer Joseph, and all officers fled the scene, leaving him injured
22 on the ground.

23 57. Mr. Mackintosh suffered lasting shoulder and back injuries
24 from this incident, later aggravated during the fourth stop.

25 58. On April 8, 2025, Mr. Mackintosh received a notice from
26 the University of California, Los Angeles dispute-resolution office,
27 ("UCCD"), purporting to open an investigation into the incident; a
28 subsequent letter declared the matter final and exonerated the officers.

E. Fourth stop — July 10–11, 2026 (Officer Cuillard and Doe Officer 2)

59. On July 10, 2026, at approximately 10:40 p.m., Mr. Mackintosh was lawfully parked in a grocery store parking lot in Burbank when Officer Cuillard used his patrol car to block his vehicle from reversing and leaving the parking lot, while a cement barrier blocked the front of his car. Mr. Mackintosh immediately began recording the encounter.

60. Officer Cuillard stated that Mr. Mackintosh’s “registration had been expired since 2024.”

60A. The registration status Officer Cuillard invoked is genuinely disputed, and its cause predates Mr. Mackintosh’s ownership. Before Mr. Mackintosh purchased the vehicle from a dealership and financed it, a catalytic converter bearing serial number D-193-134 — which does not match the vehicle OEM catalytic converter — was welded onto the exhaust system, in a location underneath the vehicle that no ordinary consumer, including Mr. Mackintosh, could have seen.

60B. That chop and weld job was omitted from every purchase, disclosure, 125+ point inspection, and finance document. Because of the converter issue, the vehicle cannot pass a California SMOG inspection, and the DMV will not permit registration to be completed until the converter is replaced or serviced by a certified SMOG mechanic or SMOG technician — a repair Mr. Mackintosh cannot afford precisely because the citations, holds, lost income, and impound fees alleged in this Complaint consumed the money he was saving and would have used to pay for the major repair. Mr. Mackintosh must drive to work, work to save, and save to repair; each stop, citation, and impoundment for “expired registration” therefore does not enforce

1 compliance — it forecloses it entirely.

2 60C. The “125+ point inspection” representation on which
3 Mr. Mackintosh relied was, by the time of his purchase, already the
4 subject of a federal deception order. In *In the Matter of CarMax, Inc.*, FTC
5 Docket No. C-4605 (final order Mar. 2017), the Federal Trade
6 Commission charged that CarMax’s advertising of its “125+ Point
7 Inspection” and reconditioning process, without adequate disclosure that
8 some vehicles carried open, unrepaired safety recalls — including Takata
9 airbag and ignition-switch defects — was deceptive under Section 5 of the
10 FTC Act; CarMax, without admitting the allegations, agreed to a final
11 consent order prohibiting unqualified inspection and safety claims,
12 barring misrepresentation of recall and repair status, requiring notice to
13 customers who purchased vehicles dating back to July 1, 2013, and
14 imposing compliance and recordkeeping obligations for a term of twenty
15 years. Mr. Mackintosh pleads that order as context, not as a claim against
16 the FTC or as proof of the converter substitution itself: it establishes that
17 the inspection representation was material to consumers, that unqualified
18 versions of it had been federally adjudged deceptive years before his
19 purchase, and that the seller was on federal notice that buyers rely on
20 it — context bearing on the willfulness of the concealment alleged in
21 ¶¶ 60A–60B and on why Mr. Mackintosh, an ordinary consumer, could
22 not have discovered the non-conforming converter himself.

23 61. When Mr. Mackintosh declined to identify himself out of
24 genuine fear arising from all other prior stops and attempted
25 false arrests and other perceived retaliation, Officer Cuillard
26 threatened to arrest him and take him to jail if he continued refusing
27 to identify himself. Officer Cuillard then unclipped his firearm
28 holster and placed his hand on his firearm while ordering Mr. Mackintosh

1 to “show me your right hand” — a right hand Mr. Mackintosh was
2 using on his right leg to support himself while leaning out of the car to
3 record — and kept saying “don’t reach for that weapon,” although
4 Mr. Mackintosh had no weapon on him and was recording the stop.
5 Doe Officer 2 put on rubber gloves.

6 62. The officers then reached for Mr. Mackintosh’s body,
7 said “okay, you’re going to jail,” and grabbed him as he stood
8 himself up and out of the car to turn around. The arresting officers
9 immediately slammed his body against an adjacent parked car,
10 leveraged their full body weight against him, crushing his chest, and
11 forced his arms upward behind his back with their full strength, causing
12 muscle damage and aggravating the shoulder trauma from the March 3,
13 2025 incident.

14 62A. The handcuffs were applied so tightly that they blistered the
15 skin of Mr. Mackintosh’s wrists; in the days that followed, the blisters
16 broke open during ordinary daily movement; the broken skin then
17 revealed a gash with deep lesions on the wrist, bled, and developed an
18 infection; and the wound is now scabbing over in a manner that is forming
19 a permanent scar. Mr. Mackintosh photographed the wounds and
20 continued documenting these events. He also invoked his right to remain
21 silent and stated that he did not consent to any searches or seizures while
22 he was in handcuffs. The officers nonetheless continued asking
23 interrogating questions, repeatedly after his invocation to remain silent.
24 He was placed in the patrol car while officers searched his entire vehicle
25 without a warrant — including the trunk — cutting open boxes, opening
26 sealed bags, and removing his clothes, shoes, food, and belongings.
27 Officers repeatedly walked back to the patrol car and opened the door to
28 ask him further questions, and searched containers filled with tools.

1 The officers also took Mr. Mackintosh's telephones. The first was the
2 phone in his hand, which the officers seized as they grabbed his arms,
3 ending his recording of the encounter. After he stated that he did not
4 consent to any search or seizure, the officers returned to his vehicle and
5 removed two additional telephones from inside it. No search warrant was
6 presented to him then, and none has been presented since. The telephones
7 were later returned — still without any warrant, inventory of access, or
8 disclosure of whether their contents were examined or copied. The
9 registration dispute that was the stated basis for the encounter required no
10 telephone, and the officers articulated no evidentiary or inventory purpose
11 for taking three of them. Mr. Mackintosh alleges, on information and
12 belief and subject to confirmation through discovery, that the officers took
13 the devices in order to examine or forensically extract their contents —
14 which include his privileged and confidential communications with his
15 wife concerning this case and the federal matters in which they are
16 witnesses — and that the extraction reports, device logs, chain-of-custody
17 records, and forensic-tool records in Defendants' possession will show
18 whether, when, and by whom the contents were accessed or relayed.
19 Under *Riley v. California*, 573 U.S. 373 (2014), any warrantless
20 examination of the digital contents of a phone seized incident to arrest is
21 unconstitutional. The scope of the search far exceeded any purpose
22 connected to the registration status — itself the subject of a legal
23 dispute — that was the stated basis for the encounter.

24 63. Among the items the two arresting officers opened and
25 handled were sealed anti-static, anti-RFID evidence-preservation
26 Faraday bags — materials recognizable on sight as forensic-preservation
27 packaging — containing crucial and key evidence Mr. Mackintosh
28 maintains for the federal investigation and for his civil claims. After

1 recovering access to the vehicle's contents on July 13, 2026, he found all
2 preservation bags and containers opened and their forensic integrity
3 compromised, and he has been unable to fully determine what, if anything,
4 was erased, tampered, spoliated or taken. Items gathered from those bags
5 were not cataloged in the booking inventory but were nonetheless taken.
6 Upon the vehicle's return, the preservation bags were visibly flatter and
7 no longer full; an iMac hard drive and other items stored in them appear
8 to be missing, pending a complete inventory; and Mr. Mackintosh
9 personally observed Doe Officer 2, during the July 10, 2026 search,
10 remove items from the sealed bags and place them on top of the vehicle.

11 64. Officers also seized Mr. Mackintosh's dog — a dog who has
12 become his service and emotional-support animal — and delivered the dog
13 to the Burbank Animal Shelter.

14 65. While Mr. Mackintosh was in severe pain from the handcuffs
15 in the back seat of the patrol car, he observed Officer Cuillard's computer
16 mounted on the dashboard issued by the City of Burbank, which displayed
17 a computer-aided-dispatch ("CAD") display showing Mr. Mackintosh's
18 driver license information, name, phone number, vehicle identification,
19 finance company, and DMV information, with the most recent action
20 reading "extracted delinquency alert." The display showed that his
21 identity and records had been queried before any interaction with
22 him began, and that Officer Cuillard had been searching for him and his
23 car — facts contradicting statements Officer Cuillard made at the scene
24 after Mr. Mackintosh stated, "you're searching, and you were ordered to
25 search for me to arrest me."

26 66. Mr. Mackintosh was arrested, transported to the Burbank Jail,
27 and held from approximately midnight until approximately 7:45 a.m. on
28 July 11, 2026.

1 67. During the booking process between 11:30 p.m. and 2:00 a.m.,
2 Doe Officer 2 searched Mr. Mackintosh a second time, which was
3 unnecessary, during which he groped the side of Mr. Mackintosh's
4 genitals, and Mr. Mackintosh was forced to strip naked and wear paper
5 clothing as punishment for remaining silent under the Fifth Amendment
6 to the U.S. Constitution, although he was a short-term detainee held on
7 citation-level allegations. Two female jailers witnessed the officers'
8 conduct while Mr. Mackintosh remained silent.

9 68. Officers seized and cataloged a thumb drive Mr. Mackintosh
10 wore strapped around his neck, together with his wallet, papers, and debit
11 cards from a joint account he holds with his wife, who authorized his
12 possession and use of the cards, but did not record the seized evidence
13 from his vehicle. When Mr. Mackintosh, exercising his Fifth Amendment
14 right, remained silent about the account holder, Officer Cuillard stated,
15 "Okay, you'll be charged with stealing this debit card and identity
16 theft" — a felony accusation that Officer Cuillard knew or should have
17 known was unfounded and would jeopardize Mr. Mackintosh's
18 employment. The identity-theft charge was dropped but an obstruction
19 charge stayed instead; the accusation was made to coerce him to speak,
20 not as a good-faith charging decision.

21 69. Mr. Mackintosh was ultimately charged with resisting,
22 delaying, or obstructing a peace officer under California Penal Code
23 § 148(a)(1). The charge was pursued by Officer Cuillard and is now
24 being reviewed by a prosecuting office even though, prior to the arrest,
25 Mr. Mackintosh said, "you're going to ruin my life, and I know you're
26 going to arrest me, and I know you were dispatched to search for me and
27 that came from the chain-of-command," and even though, when the
28 officers grabbed his arms to arrest him, Mr. Mackintosh stood out of his

1 car while the officers grabbed his arms, and he willingly turned around to
2 be handcuffed, even when the officers failed to give the under arrest
3 command, or step out of your vehicle command or any other command
4 that could have been obstructed, delayed or resisted. The two charges must
5 be read together and in sequence: a felony identity-theft accusation
6 was threatened to compel Mr. Mackintosh to abandon his silence (§ 68);
7 when the threat failed and the accusation was dropped, the obstruction
8 charge was pursued in its place — against a man who, on the facts above,
9 obstructed, delayed, and resisted nothing. The obstruction charge was
10 therefore initiated and is being pursued without probable cause, and
11 its function is the same as the felony threat that preceded it: to punish
12 Mr. Mackintosh's silence, to burden his witness role and his announced
13 litigation, and to place on his record a charge whose mere pendency
14 threatens his remaining employment and liberty (§§ 75, 95–96).

15 70. Upon release, Mr. Mackintosh was told by staff at the
16 police-department front desk that he had to pay \$175 for a vehicle-release
17 slip — a piece of paper — and then that the vehicle would not be released
18 until he first paid the DMV and all other fees after she performed a search
19 in the interagency system that's connected to DMV and other agencies.
20 After walking to the impound yard, the manager stated that he needed the
21 release form from the police station's front desk in order for them to start
22 the process, and full payment of all fees, and that he shouldn't even be in
23 their office without that release slip to release the vehicle. The Burbank
24 DMV office was closed until Monday, and a lien on his car would
25 commence after 72 hours — with daily storage fees charged at an
26 interval spanning the weekend, during which release was impossible. The
27 vehicle — Mr. Mackintosh's residence, his workplace, and the repository
28 of his litigation files — remained impounded, rendering him another

1 homeless man in California.

2 71. The July 2026 stop and impound cost him approximately
3 \$2,300 in fees, penalties, charges, and surcharges, a figure that does not
4 include lost time or lost income, and the impound separated him from his
5 home, his business equipment (deep-cycle batteries, an inverter, and the
6 printer he used to print drafted documents to prepare for litigation), his
7 records, and his dog, on whom he co-depends.

8 71A. The exactions are calibrated to consume the cost of a defense.
9 Each enforcement cycle extracts approximately \$500 to \$2,300 from its
10 target — the \$175 release slip, towing and daily storage charges, and
11 DMV fees and penalties — payable as a precondition to recovering one's
12 own property and livelihood. A retainer for misdemeanor defense counsel
13 commonly begins at approximately \$2,500. The Scheme thus strips from
14 its targets, in advance of any adjudication, approximately the sum they
15 would need to retain counsel — and it did so to Mr. Mackintosh, who
16 faces the pending charge described in ¶ 69 without representation because
17 the exactions alleged herein consumed the funds that would have paid for
18 it. On information and belief, this is not incidental: a system that first takes
19 a person's money and then presents him with a criminal charge predictably
20 produces unrepresented defendants and pleas of guilty or no contest driven
21 by imposed poverty rather than guilt.

22 **F. Employment and income losses**

23 72. Mr. Mackintosh was employed full-time by Gap, Inc., a
24 private employer, during the period in which he was investigating matters
25 related to the Jacobs Letter and the criminal investigation into Uber
26 ordered by Judge Alsup in the *Waymo* case.

27 73. During that employment, while Mr. Mackintosh was
28 investigating the Jacobs Letter, his employer attempted to double- and

1 then triple-pay him a bonus to set him up for payroll theft, but,
2 Mr. Mackintosh met with H.R., corrected it, and took photos as
3 evidence, and thereafter his employer constructed a pretext to terminate
4 his employment, ending his income. Almost immediately after Gap's
5 conduct occurred, its CEO resigned. A CEO who said in internal
6 videos that "he loves the company and sees himself there for years to
7 come."

8 74. After his employer abruptly terminated his employment
9 under the protection of California's *at-will* policy, and through the
10 constructed termination practices, Mr. Mackintosh continued seeing
11 iPhone ads and was influenced to earn quick cash performing work
12 from his car as an independent contractor, placing him in his car
13 approximately ten to fourteen hours per day on public roads, and
14 this is when the issuance of citations started accelerating and
15 accumulating.

16 75. Immediately before the July 10, 2026 stop, he was
17 earning approximately \$1,300 per week not including expenses
18 to work, for example gas. He split his time between work and working on
19 his cases. Since July 10, 2026, the impoundment of his vehicle, and
20 the DMV registration hold have prevented Mr. Mackintosh from
21 performing any work without risking another impoundment, causing
22 continuing losses of approximately \$50 to \$275 per day, which
23 continue to accrue to this present day. The DMV representative
24 gave Mr. Mackintosh an operating permit for SMOG, which he can use
25 to drive around to clear codes once the sensor in the catalytic
26 converter is fixed, or if he buys a new one to clear the codes. The permit
27 is vague on its face, identifies no protected routes, purposes, or dates, and
28 provides no assurance against a further stop or impoundment while he

1 drives to complete the repair and clear the emissions codes — leaving the
2 threat of a fifth stop and a fourth impoundment fully intact (§ 76A).
3 In addition, even if the car is repaired, and even if the pending
4 obstruction charge is dropped, Mr. Mackintosh faces the termination
5 of his only remaining source of income he relies on, during
6 a routine background check while the arrest remains on his
7 record.

8 76. Those continuing losses of approximately \$50 to \$275
9 per day remain unabated and accrue daily while the vehicle
10 remained seized by the impound yard and now remains administratively
11 seized by the DMV under a registration hold. These events,
12 paired with the fact that Mr. Mackintosh must drive to earn income, mean
13 he is at risk of having the vehicle repossessed as he is being
14 obstructed from working, or runs the risk of an impoundment if he does
15 work or drives around to clear codes from the vehicle's computer systems
16 to complete the DMV registration.

17 76A. The registration condition and the income losses are locked
18 together. To complete registration, Mr. Mackintosh must replace the
19 non-conforming catalytic converter installed before his purchase (§ 60A);
20 to pay for that repair, he must work; to work, he must drive; and each time
21 he drives, the same alleged conditions expose him to a fifth stop and a
22 fourth impoundment. The system thus punishes Mr. Mackintosh for a
23 condition it prevents him from curing — a structure that is itself evidence
24 that the object of the enforcement is revenue and retaliation, not
25 compliance.

26 76B. The seizure and hold on Mr. Mackintosh's car are also
27 interfering with his existing contractual relations, and that
28 interference compounds daily. First, his vehicle is financed under a

1 conditional sale contract (§ 24); because the seizure and
2 registration hold are obstructing him from working, his finance
3 payment is falling further behind, accruing late fees, exposing
4 the vehicle — his home — to repossession. A repossession
5 caused by Defendants' obstruction of his income would complete
6 what the Scheme began: it would render him homeless not
7 by impound but by default. Second, Mr. Mackintosh's contracting work
8 includes an employer incentive payment of approximately \$1,700
9 conditioned on meeting specified hours worked; because the seizure and
10 hold prevent him from putting those hours on the clock, he is being
11 prevented from earning that payment. These are concrete, present
12 injuries to Mr. Mackintosh's business and property within the
13 meaning of 18 U.S.C. § 1964(c), further exactions in the chain pled
14 in §§ 96 and 103–118, and evidence of the immediate and
15 irreparable harm supporting the injunctive relief sought listed under
16 Prayer ¶ 7.

17 77. Mr. Mackintosh has additionally paid citation amounts
18 of approximately \$450 with the San Francisco Municipal Transportation
19 Agency (A parking enforcement agency that operates similarly to the
20 LADOT, and other city parking enforcement agencies) in 2022
21 that were attached to his DMV registration when he resided in the
22 City of San Francisco, a \$500 impound charge by a City of San Francisco
23 impound yard, and \$589 with the LADOT, which continued
24 following him in every area he stopped or parked, while working and
25 during his active investigation into the Jacobs Letter and his litigation of
26 the *Mackintosh* case in the United States District Courts for the Northern
27 and Central Districts of California and the Ninth Circuit Court of Appeals.
28 Those citations and the impoundments involved another seizure

1 and tow and storage fees imposed under California policies,
2 procedures, vehicle code provisions, and other laws ratified by the
3 Co-Conspirator Defendants, specifically, Newsom and Bass, and the
4 remaining Defendants, and other California public officials who ratified
5 or otherwise furthered the conduct in the preceding paragraphs, who
6 are unnamed and unknown at this time to Mr. Mackintosh.

7 77A. The exactions described throughout this Complaint also
8 consumed funds and small amounts of valuable resources Mr. Mackintosh
9 had specifically been storing and setting aside for a legal process here
10 and abroad. He was holding the funds in his account to pay fees
11 charged by the Australian Government, Attorney-General's Department,
12 to process legal documents for family-law proceedings involving
13 his wife in Australia, themselves precipitated by the years-long
14 retaliation by police officers in Sacramento and San Francisco, while he
15 investigated Jacobs Letter and the financial strain described herein.
16 The citations, continuous registration holds, accrued impound charges,
17 penalties and related takings by California agencies depleted those
18 earmarked savings of approximately \$500 or more, forcing Mr.
19 Mackintosh to divert them to Defendants' demands and preventing and
20 delaying the processing of his legal documents, and attempting to prevent
21 and obstruct him from filing his civil lawsuit for redress against Newsom
22 and Bass, and others. This is a concrete injury to Mr. Mackintosh's
23 property, and a further illustration of the Enterprise's method of
24 commission: money taken by the Scheme is money taken from every
25 other purpose to which its victim had committed it or intended to commit
26 it — here, Mr. Mackintosh's access to a legal process itself, and the filing
27 and litigation in federal courts.

28 78. The LADOT citations issued to him and his vehicle from 2024

1 to the present contained printed language addressed to recipients who are
2 “experiencing homelessness.” The relevant non-party agencies and the
3 Defendants therefore knew that their parking-enforcement officers and
4 practices reach persons whose vehicles are their homes in Los Angeles,
5 and that those practices could render them homeless — a homelessness
6 crisis that is itself under federal investigation, and one for which
7 Mr. Mackintosh had been gathering and storing evidence, including
8 these very citations with admissions printed on them. The citations also
9 worked a second harm: while Mr. Mackintosh was attempting to pursue
10 his litigation and to provide evidence of federal crimes in connection with
11 the investigation ordered in the *Waymo* case, the repeated and escalating
12 citations eventually pulled his attention away from that work and into
13 investigating why he was continuously being cited — a diversion pled in
14 ¶ 93, and conduct that operated to obstruct justice and to tamper with a
15 witness to the Uber federal criminal investigation as alleged in ¶¶ 91
16 and 116. The officers nonetheless impounded the vehicle they knew
17 served as Mr. Mackintosh’s residence, rendering him homeless until he
18 expended money to re-shelter himself, and the threat of being forced into
19 homelessness again persists.

20 **G. The payment demands that followed the stops**

21 79. On April 16, 2025, the DMV mailed Mr. Mackintosh a notice
22 demanding \$879, including LADOT citation amounts that the DMV
23 attached to his vehicle registration.

24 80. On April 23, 2025, he received a Superior Court notice arising
25 from Officer Joseph’s citation, demanding \$828 as bail.

26 81. The Beverly Hills Superior Court, Traffic Division, has
27 demanded \$1,580 from him before he may have a trial or a trial by written
28 declaration on the citations. When Mr. Mackintosh drafted, printed, and

1 submitted through USPS a trial-by-written-declaration requesting to
2 contest all three citations that were centered on similar CVC allegations,
3 license plate obstruction, a clerk used the USPS to respond, and
4 asserted that he could not contest a citation without first depositing
5 the fine amount. The clerk made further statements that each citation
6 issued by UCPD and GPD had to be contested separately for each
7 citation.

8 82. After Mr. Mackintosh drafted and finalized a declaration and
9 mailed it to the Glendale courthouse for the second stop, to contest its
10 validity, it was returned as undeliverable by the USPS. Mr. Mackintosh
11 was also unable to access the citation through the court's online website
12 or to appear remotely to contest the citations. While other litigants or
13 petitioners were permitted to appear and contest their citations by video
14 call, Mr. Mackintosh was not, regardless of the court's justification, rules,
15 policies and other procedures. On July 21, 2025, and continuing
16 thereafter, the FTB used the USPS mailing system to send Mr. Mackintosh
17 multiple demands for court-ordered debt collection, threatening various
18 deprivations of property, such as wage garnishment, bank levies,
19 seizure of property.

20 82A. The closing of Mr. Mackintosh's avenues to be heard in a
21 traffic court was not limited to the pay-first precondition (§ 81) and the
22 undeliverable mailing (§ 82). As reflected in court and agency records as
23 seen in the attached exhibits: the SFMTA cancelled Mr. Mackintosh's
24 scheduled hearings to contest his San Francisco citations at SFMTA
25 headquarters in San Francisco; and California courts terminated his
26 remote hearings to contest citations at the last minute, leaving him without
27 any practical court forum in which to be heard, leaving his citations open
28 and unpaid, allowing parking enforcement and police officers to stop him

1 and continue citing him. During the same period, the DMV began
2 attaching unpaid citation amounts, including SFMTA and LADOT
3 amounts, to Mr. Mackintosh's vehicle-registration renewal costs — the
4 mechanism by which the Scheme converts contested citations into
5 registration holds (§§ 21, 79) — as reflected in the DMV renewal notices
6 and demands mailed to him. That change coincided with Mr.
7 Mackintosh's San Francisco litigation and investigation; it is when the
8 citations against him began to increase; and its effect was to price
9 registration beyond his reach at precisely the moment his income was
10 being consumed by the impound yard and the citations themselves.
11 Defendants' own staff have since confirmed, in their own verbal
12 admissions during the course of their Scheme, both the policy and its
13 purpose: specifically, when Mr. Mackintosh visited the Burbank police
14 station's front desk on July 13, 2026 at approximately 10:30 a.m. to ask
15 for a vehicle release slip, the station staff told Mr. Mackintosh — a
16 statement of which Mr. Mackintosh possesses evidence — that a new
17 policy would soon be implemented under which vehicle registrations
18 would be seized if there are any unpaid parking citations attached to
19 vehicles "because people are not paying them." That admission states the
20 Scheme's object in a single sentence: the registration system is used not
21 for road safety, but as a collection device to extract payment from those
22 who have not paid questionable citations.

23 83. In August 2025, Mr. Mackintosh received a demand from a
24 law firm hired by the Courts, which threatened legal action against him if
25 he refused to pay up.

26 **H. The connection between the stops and Plaintiff's protected**
27 **activity**

28 84. Mr. Mackintosh alleges, on information and belief, that the

1 four stops were not independent enforcement events but coordinated
2 responses to his protected activity through the use of geolocation data
3 extractions, FLOCK camera and sensor systems, ALPRs and other
4 surveillance that recorded his precise travel patterns and locations for
5 police officers to access and intercept — his role as a witness to the federal
6 criminal investigation into Uber described above, his demand letters to
7 public officials in California, the fact that he holds evidence related to the
8 Uber investigation — including evidence of Uber’s employees’ and
9 contractors’ access to and misappropriation of his highly valuable trade
10 secrets and other intellectual property — and his stated aim of using the
11 courts to guard his fellow Americans from the harm he faces — directed
12 or facilitated by one or more government-agency officials whose identities
13 are presently unknown to Mr. Mackintosh at this time and who are sued
14 herein as Does 11–20. Mr. Mackintosh’s belief is founded on the
15 following facts, each within his personal knowledge or documented.

16 85. Each stop invoked the same pretext — a license-plate
17 display or registration issue or obstruction — and the second
18 stop repeated a pretext that had already been disproven:
19 Mr. Mackintosh handed Officer Shubunka the prior citation for the
20 identical alleged condition, and the officers cited him again anyway,
21 adding more CVCs alleging his car is unsafe for public roads in an attempt
22 to seize his car (§§ 46–47).

23 86. Officer Cuillard’s dashboard computer displayed his
24 driver license information, his name, address, phone number,
25 vehicle and finance information, and a completed “extracted
26 delinquency alert” action before any interaction with him
27 began, showing that his records were queried in advance of the
28 encounter (§ 65).

1 87. The stops escalated in severity — citation, armed
2 intimidation, physical violence, then impoundment,
3 arrest and charges — in temporal proximity to Mr. Mackintosh’s
4 protected acts from 2017 to the present, including: the seizure
5 of his truck and the citations issued to him; the repeated
6 night-time location, spotlighting, and following of his parked vehicle
7 beginning in 2021 and documented on video (§ 35E); the use of
8 government surveillance that tracked his whereabouts when
9 he relocated from the City of San Francisco to Los Angeles County;
10 the legal demand letters he mailed to Governor Newsom and
11 Mayor Bass; the written notice he mailed to the Office of the
12 Los Angeles City Attorney asserting that the parking-citation
13 practices violate the federal racketeering laws when evaluating
14 the totality of the practice of the Scheme (§ 35); his fraud on the Court
15 motion filed in the Central District of California against Tim Cook,
16 Uber, Apple, their attorneys, among others, and his statement in
17 that federal proceeding that, “he will litigate from his car if he has to”
18 and supplied the screen shots of his statements; and his repeated
19 calls, emails, and other correspondence seeking to stop the citations,
20 fees, fines, penalties, and other Scheme exactions he faced from the
21 DMV, SFMTA, LADOT, and other agencies. Defendants Newsom and
22 Bass knew, from his written legal demands and correspondence, what
23 was transpiring in San Francisco, Los Angeles, and other California
24 jurisdictions.

25 88. The stops were conducted by officers of at least three
26 different agencies, in different California cities, that operate similarly and
27 in close proximity to their department policies listed on their online
28 websites, against the same individual, over the same minor alleged

1 conditions — an enforcement intensity vastly disproportionate to the
2 alleged infraction, and consistent with the documented escalation
3 and improbable geography alleged in ¶¶ 35A–35B.

4 89. During the fourth stop, officers opened and handled sealed
5 materials Mr. Mackintosh maintained as evidence for the federal
6 investigation and his civil claims (¶¶ 62A–63), and the impoundment
7 separated him from the equipment he was using to prepare this
8 Complaint (¶¶ 70–71).

9 90. The identities of the persons who queried his records,
10 dispatched or surveilled him — including through FLOCK automated
11 license-plate-reader systems, ALPRs and other means — directed the
12 stops, or communicated among agencies, and the contents of
13 any such directives, are peculiarly within Defendants’ knowledge and are
14 recorded in CAD logs, ALPR and database query histories, dispatch
15 records, and interagency communications, which he will obtain in
16 discovery.

17 91. On the basis of the foregoing, Does 11–20 acted with
18 knowledge of his protected activity and with the purpose of
19 hindering, delaying, and preventing his communication of information
20 to law enforcement and his prosecution of his claims, within the meaning
21 of 18 U.S.C. §§ 1512 and 1513.

22 92. On the basis of the foregoing paragraphs, Mr. Mackintosh
23 further alleges, and alleges on information and belief, that Does 11–20
24 acted with knowledge of his protected activity to obstruct
25 his lawful efforts, and to allow the continuous seizure of his
26 property, money, and valuable resources and the repeated injuries and
27 threats of which Defendants Newsom and Bass were made
28 aware through his written demands, that listed his name and other

1 information.

2 93. As a result of that conduct, Mr. Mackintosh was coerced to
3 redirect his attention away from his ongoing Uber and Apple
4 investigations and trade secret and intellectual property theft case,
5 the *Mackintosh* case, and from the court filings through which he
6 sought redress, and redirected it towards the immediate threats of
7 citations, holds, and impoundments described above. In the
8 course of doing so, he began investigating homelessness in
9 Los Angeles, the tampering with, and subsequent invalidation of
10 his voter registration and cast vote for address issues, and other matters
11 that affect him, that he understands to be the subject of federal
12 investigations by the DOJ and its fraud task forces.

13 **I. Plaintiff's draft complaint, the immediate retaliation that followed,**
14 **and the conspiracy**

15 94. In 2025, Mr. Mackintosh began drafting a separate civil
16 complaint on the MacBook computer he kept in his vehicle at all times
17 relevant here. The draft alleged that the Scheme described in the preceding
18 paragraphs and in this Complaint — pretextual stops; surveillance and
19 automatic citation driven by cameras, databases, and license-plate readers,
20 which automatically take property from Americans in the name of safety
21 and without any crime; year-over-year increases in fines, fees, penalties,
22 the creation of new taxes for any reason, and DMV charges; registration
23 holds and terminations; and impoundments enforced by threat of arrest
24 and seizure — operates as extortion under color of official right in
25 violation of the Hobbs Act, 18 U.S.C. § 1951; as a scheme executed
26 through the mails and wires in violation of 18 U.S.C. §§ 1341 and 1343;
27 and as forced labor under servitude in violation of 18 U.S.C. § 1589.

28 94A. It alleged that Americans who reside in California

1 must work longer hours, second and third jobs, side jobs and gig
2 jobs, and overtime away from their families simply to afford and
3 keep the cars they need to live, to earn, and to feed their families
4 while paying the excessive taxes that are created year-after-year and
5 increase year-over-year, and are affected by the Scheme — and that those
6 who cannot pay have their vehicles cited and taken, are harassed and
7 arrested, and are entered into enforcement databases for further
8 collection and imprisonment. The draft further alleged, based on his
9 research, that public officials — including Marqueece Harris-Dawson and
10 others on the Los Angeles City Council — have ratified the pretextual
11 stops, the continuous citations, the parking-enforcement practices, and
12 the year-over-year increases in fines, fees, penalties, and other costs that,
13 the draft alleged, sustain this system that forces Americans into servitude
14 through forced labor. Drafting that complaint for filing is protected
15 petitioning and speech under the First Amendment, and protected witness
16 activity within the meaning of 18 U.S.C. §§ 1512 and 1513.

17 95. His allegations grew. The draft catalogued unchecked
18 year-over-year DMV increases ratified by Newsom — who signed
19 Assembly Bills for pay increases to DMV employees and others, while
20 extending penalties for Americans — including but not limited to:

- 21 A. 1997 – 1998: Early adjustment to DMV fees and smog abatement fees;
22 B. 2003 – 2004: The VLF was increased (the “car tax” hike) back to 2%
23 after previous offsets were removed, before finally being reduced to
24 0.65% in late 2004;
25 C. 2009: Significant increases in registration fees and VLF adjustments
26 due to “state budget crises”;
27 D. 2010 – 2011: Further adjustments to CHP fees;
28 E. 2017 – 2018: Introduction of the Transportation Improvement Fee

- 1 (TIF) (commonly known as the SB 1 “Road Repair and Accountability
2 Act” fee), which added \$25 - \$175, depending on vehicle value;
3 F. 2020: Increase in miscellaneous fees;
4 G. 2021: Further CPI-based increases to base registration and special fees;
5 H. 2023: Introduction of the Zero Emission Vehicle (ZEV) road
6 improvement fee for electric vehicles;
7 I. 2024: Incremental increases in specialized fees;
8 J. 2025: Increase in base registration fee to \$74, along with inflation
9 adjustments to TIF;
10 K. 2026: Significant increases driven by new EV road fees, higher vehicle
11 valuations affecting VLF, and increased CHP fees; and
12 L. 2027 – 2028: A new proposed per-mile charge for freeways and roads
13 to compensate for electric cars.

14 Those increases — together with excessive taxation ratified by
15 Governor Newsom, which Mr. Mackintosh calculates to exceed
16 \$1.6 trillion yearly across sales tax, payroll tax, gas tax, property
17 tax, and excise taxes, state funds, and many other levies, and with
18 the alleged corporate planned obsolescence of Apple products
19 under Tim Cook’s direction, which compels consumers to replace
20 \$999-to-\$1,600 iPhones and other devices as they are rendered
21 obsolete, among other corporations’ constructive takings — are
22 cumulatively among the drivers of this forced labor, pressing
23 millions of Americans residing in California, among other states,
24 into longer hours, multiple jobs, and side work performed for
25 another party, to afford costs they cannot refuse. The United States
26 itself has sued Apple over practices that raise costs for consumers
27 and lock them into its products. See *United States, et al. v. Apple,*
28 *Inc.*, No. 2:24-cv-04055 (D.N.J., filed Mar. 21, 2024). Then

1 came July 10, 2026. During the stop that night — and before his
2 arrest — Mr. Mackintosh told Officer Cuillard that he possessed
3 a drafted RICO complaint for an impending lawsuit. The
4 enforcement against him immediately escalated to its most severe
5 form: Officer Cuillard's patrol vehicle blocked his parking
6 space so that he could not reverse or leave; he was seized, injured,
7 arrested, jailed overnight, and strip-searched; he was charged with
8 obstruction; and he was stripped of his car, his evidence, his
9 business equipment, his dog, and his remaining income — with the
10 threat that, even if the charge is dropped, his only remaining source
11 of income will be terminated by the arrest on his record.

12 96. The Defendants and Does 11–130 agreed, expressly or tacitly,
13 to conduct and participate in the affairs of the enterprise described in the
14 first claim for relief, through a pattern of racketeering activity, and the
15 four stops and the property exactions that followed them were carried out
16 in retaliation for, and to hinder and prevent the filing of, Mr. Mackintosh's
17 draft complaint and his other protected activity. Even where no single
18 directive ordered a particular stop, each Defendant performed his, her, or
19 its ordinary duties in the commission of the scheme — locating Mr.
20 Mackintosh through database and license-plate queries; stopping him;
21 citing him; arresting and charging him; assessing, billing, and collecting
22 fines, fees, penalties, and registration holds; conditioning completion of
23 registration on payments and repairs that the scheme itself rendered
24 impossible (§§ 60A, 76A); and towing, storing, and conditioning the
25 release of his vehicle on payment. Each such act was that Defendant's
26 assigned part in the Scheme's method of commission, and the scheme
27 required each part to be carried out for the whole to succeed. Taken
28 together and in sequence, those acts took his money; enabled the shielded

1 termination of his employment under California's "at-will" doctrine if
2 contested; and took his home, his evidence, and his liberty — and, even if
3 the obstruction charge is dropped, Mr. Mackintosh's only source of
4 income will be terminated during a required background check conducted
5 yearly — and operated to hinder, delay, and prevent him from filing his
6 complaint related to Jacobs Letter and from communicating with judges
7 and federal authorities in federal court. Each Defendant knew that his, her,
8 or its acts furthered this common course of conduct, and the agreement is
9 to be inferred from the coordination alleged in ¶¶ 84–95, including the
10 pre-stop database queries, the duplicated citations, the on-scene
11 supervisory conferences, and the interlocking fee demands of the police,
12 the DMV, the courts, the FTB, and the impound operator, among others.

13 **CLAIMS FOR RELIEF**

14 **FIRST CLAIM FOR RELIEF**

15 **(Violations of RICO, 18 U.S.C. § 1962(c))**

16 **(Against Officers Carrillo, Shubunka, Terzian, Joseph, and**
17 **Cuillard; Doe Officers 1–10; Does 11–20; and Girard Peterson, Inc.)**

18 97. Mr. Mackintosh realleges and incorporates herein by reference
19 each and every foregoing paragraph of this Complaint as set forth in full.

20 **The RICO Persons**

21 98. At all relevant times, each RICO Defendant is a "person"
22 within the meaning of 18 U.S.C. §§ 1961(3) and 1962(c).

23 **The RICO Enterprise**

24 99. The RICO Defendants and Does 11–20 are a group of persons
25 associated together, in fact and through a loose-knit group, for the
26 common purpose of carrying out an ongoing enterprise, as described in
27 the foregoing paragraphs, specifically in the Introduction of this
28 Complaint and throughout: namely, extracting money and property from

1 Mr. Mackintosh and other Americans, through continuous pretextual
2 enforcement, the creation of new taxes and fines, corporate junk fees,
3 interest on taxes, fines and fees, escalating fines, fees, penalties, and
4 holds, seizure of his vehicle and effects, and the conditioned release of his
5 property, accomplished through the use and threat of force, threats of
6 arrest and prosecution, and fear of economic loss. This association in
7 fact constitutes an enterprise within the meaning of 18 U.S.C. §§ 1961(4)
8 and 1962(c) (the “Enterprise”).

9 100. The Enterprise has an ongoing organization and a division of
10 function among its members, and each RICO Defendant participated in
11 the operation or management of the Enterprise: the officers perform
12 the stops, citations, arrests, and seizures; agency personnel, sued as
13 Does 11–20, perform the record queries, delinquency alerts,
14 registration holds, assessments, and billing; and Girard Peterson, Inc.,
15 (“Girard”) the private carrier, performs towing, storage, and fee collection
16 that convert the officers’ stops and seizures into payment demands. The
17 Enterprise is distinct from each Defendant “person,” because it pairs
18 public officers and agency personnel with a private impound operator that
19 is a separate legal entity with its own economic stake in the storage fees
20 it charges.

21 101. At all relevant times, the Enterprise was engaged in, and its
22 activities affected, interstate commerce within the meaning of 18 U.S.C.
23 § 1962(c), and its activities interfered with, and attempted to interfere
24 with, Mr. Mackintosh’s communication of information to federal officers
25 in federal court in connection with a federal criminal investigation arising
26 out of the *Waymo* case, in at least the following ways: Mr. Mackintosh’s
27 vehicle was the instrumentality of his commercial contracting and online
28 business, through which he transported goods moving in interstate

1 commerce for interstate platforms and merchants including transporting
2 his own goods from various online stores moving in interstate and foreign
3 commerce; the seizures and registration hold halted that transport entirely,
4 eliminating approximately \$50 to \$275 per day in commercial activity;
5 Girard is a registered motor-vehicle carrier of property under CVC
6 § 34601, operating in the market for vehicle transport and storage;
7 and payments were demanded and extracted through instrumentalities of
8 interstate commerce, including electronic payment systems and the mails.

9 *Pattern of Racketeering Activity*

10 102. The RICO Defendants conducted and participated, directly or
11 indirectly, in the conduct, management, or operation of the Enterprise's
12 affairs through a "pattern of racketeering activity" within the meaning of
13 18 U.S.C. § 1961(5) and in violation of 18 U.S.C. § 1962(c), to wit:

14 *Pattern of Racketeering Activity: Extortion in Violation of the Hobbs Act,*
15 *18 U.S.C. § 1951 and California Penal Code §§ 518 and 524*

16 103. At all times material to this Complaint, Mr. Mackintosh was
17 engaged in interstate and foreign commerce and conducted his contracting
18 and online business from his vehicle — his place of business and
19 property — in California and beyond.

20 104. As described herein, the RICO Defendants obtained, and
21 attempted to obtain, Mr. Mackintosh's property with his consent
22 induced by the wrongful use of actual and threatened force, violence,
23 and fear — including fear of arrest, fear of deadly force through excessive
24 force threats, and fear of economic loss and total economic loss — and
25 under color of official right. Each RICO Defendant carried out his, her,
26 or its part:

27 105. Officer Carrillo initiated the first pretextual stop over a plate
28 both officers read aloud, demanded Mr. Mackintosh's identification under

1 threat, and issued the citation that began the escalating assessments, a
2 cumulating \$868 (§§ 36–42).

3 106. Officers Shubunka and Terzian obtained Mr. Mackintosh’s
4 driver license through a false promise that it would be returned — made
5 while both officers repeatedly placed their hands on their holstered
6 firearms and threatened him with arrest and jail — and then used the
7 license to write a second, duplicative citation, adding CVC §§ 12951
8 and 4462 among other sections to inflate the assessment by approximately
9 \$1,500, after he handed them written proof that the identical condition had
10 already been cited (§§ 43–48).

11 107. Officer Joseph and Doe Officer 1 used physical
12 force — twisting Mr. Mackintosh’s arms and back, while pulling him
13 from his vehicle while Mr. Mackintosh’s seatbelt was buckled, kicking
14 his leg out from under him so he lost balance in order to shove him to
15 the ground — and the threat of towing his vehicle for an expired
16 registration, to compel submission during the third stop, generating
17 the citation that produced the Superior Court’s \$828 bail demand under
18 threat of arrest (§§ 49–57, 80).

19 108. Officer Cuillard and Doe Officer 2 roamed and searched
20 the parking lot where Mr. Mackintosh’s vehicle was located and
21 blocked his vehicle in a parking space, threatened him with arrest,
22 unclipped a holstered firearm and gripped the weapon to create fear of
23 deadly force, physically slammed him against a parked car, arrested
24 and jailed him, threatened him with an unfounded felony identity-theft
25 charge for remaining silent, directed Girard to take possession
26 of his vehicle, and conditioned any path to release on a \$175 payment
27 for a release slip plus payment of all DMV amounts and fees
28 (§§ 59–70).

1 109. The DMV attached LADOT citations and amounts due to
2 Mr. Mackintosh's vehicle registration, and imposed registration
3 holds, fees, and penalties that rendered his driving unlawful until he paid
4 up — making his livelihood itself contingent on payment and on a SMOG
5 repair he could not afford because of the exactions themselves
6 (§§ 60A, 76A), and mailed demands for those amounts; the FTB
7 followed with threats of wage garnishment and property seizure; and
8 Girard held his vehicle, his residence and workplace, on storage fees
9 structured to escalate into a lien to keep his vehicle after 72 hours, across
10 a weekend when the officers and operator knew that payment and release
11 were impossible (§§ 70, 79–83). Mr. Mackintosh was required to use his
12 vehicle to work while the registration dispute was pending; the same
13 registration was then used as the basis to seize the vehicle; and the seizure
14 was then used to extract payment.

15 110. These acts placed Mr. Mackintosh in reasonable fear of
16 economic harm, including imminent total economic loss — the loss,
17 at once, of his income, his home, his evidence, and his means of
18 litigating — and did in fact inflict that loss. Accordingly, the RICO
19 Defendants have obstructed, delayed, and affected — and attempted to
20 obstruct, delay, and affect — commerce and the movement of articles and
21 commodities in commerce by extortion, as those terms are defined in
22 18 U.S.C. § 1951. The same conduct constitutes extortion under
23 California Penal Code §§ 518 and 524, offenses chargeable under state
24 law and punishable by imprisonment for more than one year, and therefore
25 racketeering activity within the meaning of 18 U.S.C. § 1961(1)(A).

26 *Pattern of Racketeering Activity: Multiple Instances of Mail Fraud and*
27 *Wire Fraud in Violation of 18 U.S.C. §§ 1341 and 1343*

28 111. As alleged, the RICO Defendants and Does 11–20 engaged in

1 a scheme or artifice to obtain money and property from Mr. Mackintosh
2 by materially false and fraudulent pretenses and representations including:
3 (a) representing that the assessed amounts arose from lawful enforcement
4 of a legible license plate condition that officers had verified with their
5 own eyes and that had already been cited (§§ 37, 46–47); (b) representing
6 that Mr. Mackintosh’s driver license would be returned if surrendered for
7 “verification,” when it was instead used to write a second, inflated citation
8 (§ 47); (c) representing that he could dispute citations, while conditioning
9 any hearing on full deposits of the amounts due (§ 81), and thereafter
10 cancelling or terminating at the last minute the very hearings at which the
11 citations could have been contested (§ 82A); and (d) representing that
12 payment of the demanded fees would produce release of his vehicle during
13 a period when the Defendants knew release was impossible (§ 70).

14 112. In furtherance of that scheme, the Defendants used
15 the mails and interstate wires, including: the DMV’s April 16, 2025
16 mailed demand totaling \$879, incorporating LADOT amounts
17 attached to his registration (§ 79); the California Superior Court’s
18 April 23, 2025 mailed demand for \$828 as bail (§ 80); the FTB’s
19 mailed collection demands beginning July 21, 2025, threatening to
20 garnish his wages, institute bank levies to extract payment, and seizure
21 (§ 83); and the electronic database queries, the CAD transmissions in
22 Burbank, Glendale and Los Angeles Counties, delinquency alerts, and
23 electronic payment systems used to locate Mr. Mackintosh and to demand
24 and extract payment (§§ 65, 86, 90).

25 113. Each such mailing and wire transmission constitutes a separate
26 act of mail fraud or wire fraud in violation of 18 U.S.C. §§ 1341 and 1343,
27 and each is an act of racketeering activity within the meaning of 18 U.S.C.
28 § 1961(1).

1 113A. The wire component of the Scheme extended beyond billing.
2 As alleged in ¶ 62A, the fourth stop was used not merely to cite or tow,
3 but to take three of Mr. Mackintosh's telephones — including the one
4 recording the officers — without a warrant and after his express refusal
5 of consent. The purpose and effect were to obtain access to his private
6 electronic communications, including communications about his witness
7 role related to a federal criminal investigation and this litigation, and to
8 serve the Enterprise's object of locating, obtaining, and compromising the
9 very evidence and litigation materials Mr. Mackintosh maintains. Using a
10 pretextual traffic stop as the occasion to conduct a warrantless digital
11 search — a fishing expedition for a witness's litigation materials under
12 the cover of a registration dispute — is not ordinary enforcement; it is the
13 use of official position to obtain what could not lawfully be obtained, in
14 furtherance of the obstruction and witness-tampering objects alleged in
15 ¶¶ 114–117. This conduct affected interstate wires and constitutes a
16 further act of racketeering activity within the meaning of 18 U.S.C.
17 § 1961(1) and a predicate obstruction act under ¶¶ 115–116.

18 *Pattern of Racketeering Activity: Obstruction of Justice and Obstruction*
19 *of a Criminal Investigation in Violation of 18 U.S.C. §§ 1503 and 1510*

20 114. Mr. Mackintosh is a witness in connection to a criminal
21 investigation ordered by Judge Alsup arising out of the *Waymo* case, and
22 he maintains evidence and litigation files for that investigation and for his
23 pending and contemplated federal proceedings in his vehicle (¶¶ 28–34).

24 115. As described herein, the RICO Defendants opened and
25 compromised his sealed evidence-preservation bags, failed to catalog
26 items gathered from them, seized and retained the vehicle — which
27 remains administratively seized under the DMV registration hold —
28 containing his remaining evidence, litigation files, and the equipment he

1 used to prepare his court filings, seized three of his telephones without a
2 warrant and over his refusal of consent (§ 62A), and drained his
3 financial resources through the exactions described above, with the
4 intent and effect of impeding his communication of information to
5 federal criminal investigators and judges and obstructing the due
6 administration of justice, in violation of 18 U.S.C. §§ 1503 and 1510
7 (§§ 62A–63, 70–71, 89, 91–96).

8 *Pattern of Racketeering Activity: Witness Tampering and Retaliation*
9 *Against a Witness in Violation of 18 U.S.C. §§ 1512, 1513, and 1519*

10 116. The RICO Defendants took actions harmful to Mr. Mackintosh
11 — the stops, seizures, arrest, impoundment, opening of his sealed
12 evidence, threats of an unfounded felony charge, interference with his
13 livelihood that forced him into homelessness after release — with intent
14 to hinder, delay, and prevent his communication of information
15 concerning the commission or possible commission of federal offenses to
16 federal law-enforcement officers and judges, to prevent his production of
17 records and evidence, and to retaliate against him for information he had
18 provided and for his drafted complaint, as alleged in §§ 28–35, 62A–63,
19 65, and 84–96. The charging conduct itself — the threatened felony to
20 compel speech, followed by the fallback obstruction charge when the
21 silence continued (§§ 68–69) — is likewise an action harmful to a witness
22 within the meaning of § 1513 and corruptly-persuading conduct within
23 the meaning of § 1512(b). No pending official proceeding is required,
24 18 U.S.C. § 1512(f)(1); it suffices that there was a reasonable likelihood
25 that Mr. Mackintosh would communicate with federal officers absent
26 Defendants’ conduct, *Fowler v. United States*, 563 U.S. 668 (2011),
27 and Defendants contemplated particular proceedings — the federal
28 investigation and his impending and announced litigation in the federal

1 docketing system — of which they knew as alleged in ¶¶ 33 and 95.
2 *Arthur Andersen, LLP v. United States*, 544 U.S. 696, 707–08 (2005).
3 Nor does the predicate require that Mr. Mackintosh hold any formal
4 witness designation, or that any investigation be open, pending, or
5 imminent. Section 1512(b)(3) — the clause protecting the communication
6 of information to federal law-enforcement officers and judges — “does
7 not depend on the existence or imminency of a federal case or
8 investigation but rather on the possible existence of a federal crime and
9 a defendant’s intention to thwart an inquiry into that crime.” *United States*
10 *v. Veal*, 153 F.3d 1233, 1250 (11th Cir. 1998) (affirming the convictions
11 of police officers under § 1512(b)(3)); accord *United States v. Guadalupe*,
12 402 F.3d 409, 411 (3d Cir. 2005); *United States v. Perry*, 335 F.3d 316,
13 321 (4th Cir. 2003) (false information given to local police with intent to
14 prevent a federal investigation from beginning violates § 1512(b)(3)). And
15 § 1513 is backward-looking: it prohibits retaliation against a person on
16 account of information he has already given to law enforcement
17 concerning the commission or possible commission of a federal offense,
18 so the present procedural status of any investigation is irrelevant to that
19 predicate — the retaliation itself completes the offense. Mr. Mackintosh
20 holds information concerning the possible commission of federal offenses
21 (¶¶ 28–32), has communicated and attempted to communicate it to federal
22 officers and judges (¶¶ 30–33, 87), and was retaliated against for it
23 (¶¶ 84–96); nothing more is required.

24 117. In addition, the opening of Mr. Mackintosh’s sealed
25 evidence-preservation bags, the compromise of their forensic
26 integrity, and the failure to catalog items gathered from them
27 constitute the alteration, concealment, and covering up of objects with the
28 intent to impede, obstruct, or influence the investigation and proper

1 administration of matters within the jurisdiction of departments and
2 agencies of the United States, in violation of 18 U.S.C. § 1519.(¶ 63).

3 ***The Pattern: Relatedness and Continuity***

4 118. The predicate acts alleged above span over ten years; share the
5 same victim, participants, methods, and purpose; and threaten continued
6 repetition, including the continuing surveillance, location, and
7 spotlighting of his vehicle (¶ 35E), the continuing DMV registration hold
8 that keeps the vehicle administratively seized and exposes it to re-
9 impoundment whenever it is driven, the continuing retention of the debit
10 card seized under the dropped identity-theft accusation, the continuing
11 collection demands of the DMV and FTB, and the pending charge whose
12 mere existence threatens Mr. Mackintosh's remaining employment, home
13 and liberty. They constitute a pattern of racketeering activity under 18
14 U.S.C. § 1961(5). *H.J. Inc. v. Northwestern Bell Telephone Co.*, 492 U.S.
15 229, 239–42 (1989).

16 ***Injury and Damages***

17 119. As a direct and proximate result of the RICO Defendants'
18 violations of 18 U.S.C. § 1962(c), Mr. Mackintosh was injured in
19 his business and property. Itemized, that injury includes: (a)
20 approximately \$236,000 in lost Gap, Inc. employment income
21 (\$35,000 per year from October 2019 to present) (¶¶ 72–73); (b)
22 continuing lost income of approximately \$50 to \$275 per day since July
23 10, 2026, accruing daily while his vehicle remains under seizure — first
24 by impound, and now through the DMV's registration block (¶¶ 75–76);
25 (c) the seized Dodge Ram truck — purchased for approximately
26 \$30,000 and, Mr. Mackintosh alleges, transferred into government
27 control through the DMV's power over title and registration
28 (¶ 35); (d) citation assessments and bail demands exceeding \$3,200

(¶¶ 42, 47, 79–81); (e) approximately \$2,300 in impound-release fees and charges from the July 2026 impound (¶ 71); (f) the approximately \$500 San Francisco impound charge (¶ 77); (g) the approximately \$500 in earmarked savings diverted from legal-document processing fees (¶ 77A); (h) additional tow and storage fees; (i) the approximately \$1,700 employer incentive payment he is being prevented from earning, together with the late-payment charges and repossession exposure accruing on his vehicle-finance contract (¶ 76B); and (j) the loss of use of his vehicle, business equipment, and records — damages according to proof. Excluding the continuing daily losses and the items to be proved at trial, these sums total no less than approximately \$274,200 in economic injury to Mr. Mackintosh’s business and property — before any recovery for physical injury, pain, emotional distress, or the life-altering irreparable injuries alleged herein. Trebled under 18 U.S.C. § 1964(c), the economic injury alone exceeds \$810,000. Under *Medical Marijuana, Inc. v. Horn*, 604 U.S. (2025), these business and property losses are recoverable notwithstanding that some flow from personal injury.

120. Mr. Mackintosh is entitled to treble damages, costs, and reasonable attorney’s fees under 18 U.S.C. § 1964(c).

SECOND CLAIM FOR RELIEF

(Conspiracy to Violate RICO,

18 U.S.C. § 1962(d))

(Against All First Claim for Relief Defendants;

Defendants Newsom and Bass;

and Does 11–130)

121. Mr. Mackintosh realleges and incorporates herein by reference each and every foregoing paragraph of this Complaint as set forth

1 in full.

2 121A. The RICO Defendants, Defendants Newsom and Bass, and
3 Does 11–130 have unlawfully, knowingly, and willfully combined,
4 conspired, confederated, and agreed together and with others,
5 known and unknown, directly and indirectly, as an association
6 in fact and through a loose-knit group, to violate 18 U.S.C.
7 § 1962(c) as described, in violation of 18 U.S.C. § 1962(d). Each
8 Defendant knew that his, her, or its acts were part of a pattern of
9 racketeering activity and agreed to the commission of the predicate
10 acts in furtherance of the Scheme. It is no defense that any
11 particular Defendant acted separately, did not personally commit
12 every predicate act, or was nominally responding to a call for service:
13 under *Salinas v. United States*, 522 U.S. 52, 63–65 (1997),
14 a RICO conspirator need not agree to commit or facilitate each
15 part of the substantive offense, and need not commit any predicate act
16 personally — it suffices that he adopt the goal of furthering
17 or facilitating the endeavor and play his own part, as each
18 Defendant did (¶¶ 96, 122). A lawful-sounding occasion for
19 an encounter does not launder its retaliatory object (¶ 35.4).

20 122. Each Defendant named herein knowingly agreed to
21 facilitate a scheme that included the operation or management of the
22 Enterprise. The agreement of each is shown by, among other facts:
23 the supervising officer’s on-scene conference with Officer Joseph
24 and the officers’ coordinated, simultaneous departure from the
25 scene of the third stop (¶ 56); the pre-stop database query reflected
26 in the “extracted delinquency alert” on Officer Cuillard’s CAD
27 display — which Officer Cuillard denied when Mr. Mackintosh
28 asserted that he had been searching for him and was directed to

1 make an arrest, search, and seizure — (§§ 65, 86); the handoff of Mr.
2 Mackintosh’s driver license between Officers Shubunka and
3 his partner Terzian to write a second, duplicative citation after the first
4 citation had been shown to them, with the understanding that Mr.
5 Mackintosh “will be able to go” (§§ 46–47); the interlocking conditions
6 placed on the release of Mr. Mackintosh’s vehicle, coordinated among
7 BPD, the DMV hold, and Girard (§ 70); and the method of commission
8 alleged in § 96, by which each Defendant performed his, her,
9 or its assigned part, and by which the scheme required each part
10 to be carried out for the whole to succeed. As to Defendants Newsom and
11 Bass, Mr. Mackintosh alleges that, having received his written
12 legal demands describing the fine-and-fee Scheme and its actual effects
13 (§§ 35–36, 87, 92), they ratified and permitted the continuation of the
14 scheme with knowledge of it, having consulted with attorneys, including
15 California’s Attorney General, Rob Bonta, among other lawyers and
16 consultants.

17 123. In furtherance of the RICO conspiracy, Defendants
18 committed the overt and predicate acts alleged in §§ 103–117, injuring
19 Mr. Mackintosh in his business and property as alleged in § 119, and under
20 18 U.S.C. § 1964(c), he is entitled to treble damages, costs, and fees.

21 **THIRD CLAIM FOR RELIEF**

22 **(42 U.S.C. § 1983**

23 **Fourth Amendment Violations:**

24 **Unreasonable Detention, Arrest, and Searches)**

25 **(Against All Individual Officer Defendants)**

26 124. Mr. Mackintosh realleges and incorporates §§ 1–96.

27 125. Acting under color of state law, the officer Defendants
28 continuously stopped and detained Mr. Mackintosh without reasonable

1 visual suspicion and beyond any lawful scope (§§ 36–56, 59–65),
2 arrested him without disclosing the reason for the arrest and without
3 disclosing any probable cause, and without probable cause in fact
4 (§§ 66, 69), and searched his vehicle and his person and personal
5 papers, effects and other items without a warrant, without consent, and
6 without any applicable exception (§§ 54, 62–63, 67–68), and seized the
7 car that is his residence — all in violation of the Fourth Amendment
8 to the United States Constitution. Each detention also exceeded its
9 permissible mission and duration: a stop may last no longer
10 than is necessary to address the infraction that justified it, and
11 prolonging it without independent reasonable suspicion — as officers
12 did at every stop, summoning additional units and pressing interrogation
13 after invocation (§§ 39, 41, 44, 48, 54, 62A) — is itself an
14 unconstitutional seizure. *Rodriguez v. United States*, 575 U.S. 348, 354–
15 57 (2015). And because the vehicle seized was Mr. Mackintosh's
16 residence, the Fourth Amendment's protections applied at their zenith: the
17 home is "first among equals" under the Amendment, *Florida v. Jardines*,
18 569 U.S. 1, 6 (2013), and Defendants took it — with the
19 papers, effects, and evidence inside — without warrant, exigency, or
20 process.

21 126. The warrantless search of a vehicle that the officers knew
22 served as Mr. Mackintosh's residence, and the strip search of a short-term
23 detainee held on citation-level allegations, were objectively unreasonable.
24 The seizure of three of Mr. Mackintosh's telephones — including the
25 device recording the officers — without a warrant and over his express
26 refusal of consent, and any examination of their contents, independently
27 violated the Fourth Amendment. *Riley v. California*, 573 U.S. 373 (2014).
28 The seizure of the recording device also burdened the protected activity

1 alleged in ¶ 131.

2 **FOURTH CLAIM FOR RELIEF**

3 **(42 U.S.C. § 1983,**

4 **Fourth Amendment Violations: Excessive Force)**

5 (Against Officers Joseph and Cuillard and Doe Officers 1–2)

6 127. Mr. Mackintosh realleges and incorporates ¶¶ 49–58 and
7 59–71.

8 128. The force described — twisting a seated, unresisting person’s
9 arms and back; kicking his left leg out from under him to push him to the
10 ground; applying crushing handcuffs causing blisters; slamming his body
11 into a parked car; and forcing injured arms upward behind his back — was
12 objectively unreasonable under *Graham v. Connor*, 490 U.S. 386 (1989),
13 because the alleged offenses were minor DMV issues, Mr. Mackintosh
14 verbally disputed the stops, but posed no threat, and he was not fleeing.

15 129. Mr. Mackintosh suffered physical injuries to his shoulders,
16 back, arms, and wrists — including an open wrist wound that became
17 infected and is now forming a permanent scar — aggravation of prior
18 injuries, pain, and emotional distress, all recoverable in full under § 1983.

19 **FIFTH CLAIM FOR RELIEF**

20 **(42 U.S.C. § 1983 Violations,**

21 **First Amendment Retaliation)**

22 (Against All Individual Officer Defendants)

23 130. Mr. Mackintosh realleges and incorporates ¶¶ 28–96.

24 131. Mr. Mackintosh engaged in protected activity at all relevant
25 times: petitioning government officials by written legal demand letters
26 mailed through USPS; pursuing litigation; providing information to
27 federal law enforcement in federal courts, attempting to continue
28 providing information to federal law enforcement; drafting a complaint

1 for filing; and video-recording police in public, and exercising his liberty
2 to pursue justice so other Americans do not face the same using evidence
3 and legal writings, however inartfully pled.

4 132. Defendants took adverse actions — prolonged and
5 unreasonable detentions, use of force and escalating excessive force,
6 threat of arrest and eventual arrest on pretextual registration grounds,
7 seizure of his vehicle and other property taken from his person and car,
8 the repeated night-time-day-time location and spotlighting of his in
9 motion and parked vehicle (§ 35E), and a threatened felony charge that
10 was later dropped against him but remains on his record — that would
11 chill a person of ordinary firmness. Mr. Mackintosh's protected activity
12 was a but-for cause of those actions, as shown by: the sequence and
13 escalation of enforcement following each protected act (§§ 87, 94–95); the
14 issuance of a duplicate citation after written proof of the prior citation was
15 presented (§ 85); the pre-stop database query (§ 86); the threat of an
16 unfounded felony charge immediately upon Mr. Mackintosh's invocation
17 of his right to remain silent (§ 68); the officers' escalating threats when
18 bystanders began recording (§ 55); and the arrest that followed his
19 statement that he possessed a drafted RICO complaint (§§ 33, 95).

20 132A. The arrest and the pending charge are independently
21 actionable as retaliation. A retaliatory-prosecution claim lies where
22 officials induce a prosecution in retaliation for protected activity and
23 the plaintiff pleads the absence of probable cause. *Hartman v. Moore*,
24 547 U.S. 250, 265–66 (2006). That absence is pled here (§§ 69, 125):
25 as to the physical conduct that Penal Code § 148(a)(1) addresses,
26 Mr. Mackintosh obeyed every physical command given, stood out of his
27 car when the officers took hold of his arms, and turned around to be
28 handcuffed. His declining to identify himself (§ 61) — a refusal born of

1 documented fear from the prior stops — cannot supply the missing
2 probable cause, because California has no stop-and-identify statute, and a
3 person's refusal to disclose his identity to an investigating officer is not a
4 violation of § 148(a)(1). *In re Chase C.*, 243 Cal. App. 4th 107 (2015);
5 *People v. Quiroga*, 16 Cal. App. 4th 961, 966 (1993) (finding no authority
6 that a suspect's refusal to identify himself during a police investigation
7 violates § 148). If a driver's duty to present a license exists, it arises under
8 a separate Vehicle Code provision, Cal. Veh. Code § 12951(b), which the
9 Legislature made its own distinct offense — not obstruction under § 148
10 — and Mr. Mackintosh was the parked occupant of a stationary vehicle,
11 not a driver in operation, when the demand was made (§ 59). Section 148
12 further requires that the officer be engaged in the lawful performance of
13 his duties at the moment of the alleged obstruction; a detention or arrest
14 that is itself unlawful — including one undertaken in retaliation for
15 protected activity or effected with excessive force — defeats that element
16 as a matter of law. *In re Manuel G.*, 16 Cal. 4th 805, 815 (1997);
17 *Smith v. City of Hemet*, 394 F.3d 689, 695 (9th Cir. 2005) (en banc).
18 A retaliatory-arrest claim likewise lies where the arrest was made without
19 probable cause, *Nieves v. Bartlett*, 587 U.S. 391, 402–04 (2019), and
20 Nieves's exception independently applies: even where probable cause is
21 asserted, the claim proceeds on objective evidence that similarly situated
22 persons not engaged in protected activity are not arrested for the same
23 conduct, *Id.* at 406–07 — and persons stopped over infraction-level
24 plate-display and registration matters are not customarily arrested at
25 all, let alone jailed overnight and charged. The two-step charging
26 sequence — a felony threat to compel speech, then a fallback obstruction
27 charge when the threat failed (§§ 68–69) — is also a harmful act
28 against a witness under 18 U.S.C. § 1513, as alleged in ¶ 116.

SIXTH CLAIM FOR RELIEF

**(42 U.S.C. § 1983, First and Fifth Amendments Violations:
Compelled Speech, Compelled Self-Identification,
and Penalizing the Invocation of Silence)
(Against All Individual Officer Defendants)**

133. Mr. Mackintosh realleges and incorporates ¶¶ 36–69 and 84–96.

134. The First Amendment to the United States Constitution protects not only the right of the people to speak, but the right to refrain from speaking, and the State may not compel a person to serve as a courier for its message. *Wooley v. Maynard*, 430 U.S. 705, 714–15 (1977). A central issue in this case is Defendants’ use of car license plates — a state-issued display Mr. Mackintosh is compelled to mount, exhibit, and keep camera-readable on his own property at all times even while operating his vehicle — which supplies the recurring pretext for surveilling him, scanning and searching his information, automatically issuing citations to automatically take his money through the Scheme, and stopping, citing, searching, and seizing him. As applied to Mr. Mackintosh, the enforcement regime alleged herein compelled his participation in the State’s automated surveillance and citation system under threat of citation, arrest, and seizure of his home, and punished him each time the display was said to be imperfect for the State’s cameras, even after officers verified its legibility with their own eyes.

135. The Fifth Amendment secures the right to remain silent. At each stop, Mr. Mackintosh invoked that right; the officers responded by continuing interrogation after invocation (¶ 62A), threatening arrest and jail if he did not speak to identify himself (¶¶ 39, 45, 61), and, at the fourth stop, threatening him with an unfounded felony identity-theft charge

1 specifically because he remained silent and no questions were answered,
2 and remained in complete silence thereafter (§ 68). Conditioning liberty
3 on the surrender of silence, and imposing penalties and threat of penalties
4 for its invocation, violated Mr. Mackintosh's rights under the First and
5 Fifth Amendments as applied through 42 U.S.C. § 1983.

6 136. As a direct and proximate result, Mr. Mackintosh suffered the
7 detentions, citations, arrest, and seizures alleged herein, and the attendant
8 economic and dignitary harms.

9 **SEVENTH CLAIM FOR RELIEF**

10 **(42 U.S.C. § 1983, Monell Liability)**

11 **(Against Defendants City of Burbank and the**
12 **City of Los Angeles)**

13 137. Mr. Mackintosh realleges and incorporates §§ 1--96.

14 138. The violations alleged above were caused by the entity
15 Defendants' policies, rules, customs, and ratification, including:
16 the exoneration of the officers involved in the third stop by a
17 dispute-resolution office called UCCD, without any meaningful
18 investigation, hearing or opportunity to be part of the decision making,
19 ratifying the conduct (§ 58); the City of Burbank's impound-release
20 fee policy, including the \$175 release-slip charge, the pay-all-fees
21 precondition, and the 72-hour storage-fee and lien escalation
22 applied across a weekend when payment to the Burbank DMV – an office
23 within reasonable walking distance of the impound lot — is closed on
24 weekends (§ 70); citation forms bearing printed language addressed to
25 persons "experiencing homelessness," showing policymakers' knowledge
26 that these enforcement practices reach persons whose vehicles are their
27 homes (§ 78); and the pay-first precondition imposed before Mr.
28 Mackintosh could contest the citations at all (§ 81).

EIGHTH CLAIM FOR RELIEF

(42 U.S.C. § 1983, Eighth and Fourteenth Amendments:

Excessive Fines)

(Against the City of Burbank,

the City of Los Angeles, Girard, and Does 11–20)

139. Mr. Mackintosh realleges and incorporates ¶¶ 36–83.

140. The Excessive Fines Clause of the Eighth Amendment, applicable to the states and their subdivisions, *Timbs v. Indiana*, 586 U.S. 146 (2019), limits the government’s power to extract payments as punishment, including fines, penalties, and forfeitures arising from minor vehicle infractions. *Pimentel v. City of Los Angeles*, 974 F.3d 917 (9th Cir. 2020). The Clause does not require a criminal conviction: it reaches civil exactions and forfeitures that serve, even in part, to punish. *Austin v. United States*, 509 U.S. 602, 609–10 (1993). And the Supreme Court has warned of precisely the abuse alleged in this Complaint — that excessive fines “can be used, for example, to retaliate against or chill the speech of political enemies,” *Timbs*, 586 U.S. at 154 — which is what the pattern pled in ¶¶ 84–96 and 103–118 describes. The financial exactions imposed on Mr. Mackintosh are grossly disproportionate to the gravity of the alleged infractions — license-plate display and registration matters involving no victim and no public harm. Those exactions include: base and penalty citation amounts of approximately \$868 and approximately \$1,500 in additional assessments from the traffic stops; SFMTA citation amounts of approximately \$450; escalating late penalties and assessments; DMV and court demands of \$879 and \$828; a demand of \$1,580 as a precondition to contesting the citations at all; a \$175 paper slip vehicle-release charge; impound and storage fees of approximately \$556, structured to increase after 72 hours under

1 a lien clause, imposed across a weekend during which the DMV was
2 closed and payment was impossible; and the continued retention
3 of Mr. Mackintosh's vehicle — his residence and the instrument of his
4 livelihood — as leverage for payment.

5 141. These exactions are punitive in character, deliberately
6 structured to escalate, and imposed without proportionality review, in
7 violation of the Eighth and Fourteenth Amendments. They must also be
8 measured in the aggregate: the citations, penalty assessments, DMV holds,
9 the \$175 release-slip charge, storage fees, lien, and the retention of the
10 vehicle itself were not independent charges but sequential steps of the
11 single Scheme pled in ¶¶ 96 and 103–118, and their combined weight —
12 the loss of a home and a livelihood over a plate frame and a disputed
13 registration — is grossly disproportionate to any legitimate penal purpose.
14 Mr. Mackintosh seeks damages in the amount of the excessive exactions
15 paid, an order releasing property held as payment leverage, and a
16 declaration that the exactions as applied to him are unconstitutional under
17 the Eighth and Fourteenth Amendments to the United States Constitution.

18 **NINTH CLAIM FOR RELIEF**

19 **(Battery)**

20 **(Against Officers Joseph and Cuillard and Doe Officers 1–2, and**
21 **their Employing Entities under Cal. Gov. Code § 815.2)**

22 142. Mr. Mackintosh realleges and incorporates ¶¶ 49–58, 59–71,
23 and 153.

24 143. Mr. Mackintosh never consented to being touched, grabbed,
25 twisted, struck, or moved. At every encounter he stated his objection and
26 invoked his rights, and he physically complied respectfully — remaining
27 seated and belted at the third stop, and standing and turning around to be
28 handcuffed at the fourth (¶¶ 51–52, 62A, 69).

1 144. Defendants Joseph, Cuillard, and Doe Officers 1–2
2 nonetheless intentionally touched Mr. Mackintosh in a harmful and
3 offensive manner, with force that was unreasonable and far beyond any
4 lawful need: twisting his arms, back, and shoulders while he sat
5 restrained by his seatbelt; kicking his left leg out from under him
6 to cause his imbalance in order to shove him to the ground out of light and
7 camera views; slamming his body against a parked car; wrenching his
8 injured arms upward behind his back; and applying handcuffs so tightly
9 that they blistered the skin of his wrists, which later broke open into a
10 gash with deep lesions, bled, became infected, and are now forming a
11 permanent scar (¶¶ 49–58, 59–71). Because the detentions and arrest were
12 themselves unlawful, as alleged in the Third and Fourth Claims for Relief,
13 no privilege authorized any touching at all. As a direct and proximate
14 result, Mr. Mackintosh suffered physical injury — lasting shoulder and
15 back injuries, wrist wounds and infection, and aggravation of prior
16 injuries — together with pain and emotional distress. The conduct of the
17 individual Defendants was malicious, oppressive, and in conscious
18 disregard of Mr. Mackintosh’s rights, supporting punitive damages under
19 Cal. Civ. Code § 3294, and their employing entities are vicariously liable
20 under Cal. Gov. Code § 815.2(a).

21 **TENTH CLAIM FOR RELIEF**

22 **(False Imprisonment)**

23 **(Against the Individual Officer Defendants and their**

24 **Employing Entities under Cal. Gov. Code § 815.2)**

25 145. Mr. Mackintosh realleges and incorporates ¶¶ 36–71 and 153.

26 146. Defendants intentionally confined Mr. Mackintosh without
27 lawful privilege — during each prolonged detention and during the July
28 10–11, 2026 arrest and overnight detention — for appreciable periods.

ELEVENTH CLAIM FOR RELIEF

(Conversion)

**(Against Officer Shubunka, Officer Cuillard, Doe Officer 2,
Girard, Defendant Gordon, and employing entities under
Cal. Gov. Code § 815.2)**

147. Mr. Mackintosh realleges and incorporates ¶¶ 47, 59–71, 79–83, and 153.

148. Mr. Mackintosh owned or lawfully possessed his driver license, vehicle, dog, storage drives, wallet, debit cards, business equipment, and personal property. Defendants intentionally and wrongfully exercised dominion over that property — retaining the license contrary to the stated condition of its surrender; seizing and withholding the vehicle and its contents; attaching citation amounts to the vehicle’s registration and imposing holds that deprived him of its lawful use; and conditioning release on payment of fees during a period when payment was impossible — causing damages including the property’s value, its loss of use, and the fees paid.

TWELFTH CLAIM FOR RELIEF

(Trespass to Chattels, in the Alternative to the Eleventh Claim)

(Against the Same Defendants)

149. In the alternative to conversion, Mr. Mackintosh realleges ¶¶ 47, 59–71, 79–83, and 153, and alleges that Defendants intentionally interfered with Mr. Mackintosh’s possession and use of his personal property — his vehicle, which the officers seized and the DMV’s holds and the impound operator’s fees kept from him; his sealed evidence containers, boxes, and effects, which officers cut open, opened, damaged, and handled during the searches described above; and his driver license, dog, and

1 equipment — depriving him of the property's use for substantial periods
2 and proximately causing damages including repair costs, loss of use, and
3 lost income.

4 **THIRTEENTH CLAIM FOR RELIEF**

5 **Bane Act, Cal. Civ. Code § 52.1**

6 **(Against the Individual Officer Defendants and their**

7 **Employing Entities under Cal. Gov. Code § 815.2)**

8 150. Mr. Mackintosh realleges and incorporates ¶¶ 36–96 and 153.

9 151. By threat, intimidation, and coercion — including displays of
10 and reaching for loaded and ready to use firearms during minor traffic
11 encounters, threats of arrest for declining to identify, the threat of an
12 unfounded felony charge for remaining silent, and physical violence —
13 Defendants interfered with Mr. Mackintosh's exercise and enjoyment of
14 rights secured by the United States and California Constitutions, with the
15 specific intent to do so.

16 152. Mr. Mackintosh is entitled to actual damages, statutory
17 damages, civil penalties, and attorney's fees under Cal. Civ. Code §§ 52
18 and 52.1.

19 **FOURTEENTH CLAIM FOR RELIEF**

20 **(Civil Rights Act of 1871, Section 2:**

21 **Conspiracy to Deter a Party or Witness in Federal Court,**

22 **42 U.S.C. § 1985(2); Neglect to Prevent, 42 U.S.C. § 1986)**

23 **(Against All Individual Officer Defendants and Does 11–130;**

24 **and, under § 1986, Defendants Newsom and Bass)**

25 152A. Mr. Mackintosh realleges and incorporates ¶¶ 28–35D,
26 84–96, 121A–122, and 153.

27 152B. Section 1 of the Civil Rights Act of 1871 is codified at
28 42 U.S.C. § 1983, under which the Third through Eighth Claims

1 for Relief are brought. Section 2 of the same Act, codified at
2 42 U.S.C. § 1985(2), prohibits two or more persons from conspiring
3 to deter, by force, intimidation, or threat, any party or witness in any court
4 of the United States from attending such court or from testifying
5 freely, fully, and truthfully, or from injuring such party or witness
6 in his person or property on account of his having so attended or testified.
7 Mr. Mackintosh is a party in the *Mackintosh* case and a witness in
8 connection with the federal criminal investigation arising out of the
9 *Waymo* case (¶¶ 28–34). As alleged in ¶¶ 84–96 and 121A–122,
10 two or more Defendants conspired to deter him — by force (¶¶ 49–57,
11 61–62), by intimidation (¶¶ 44–45, 61, 68), and by threat (¶¶ 45, 61,
12 68) — from attending and litigating in the courts of the United States
13 and from communicating his evidence to them, and injured him in his
14 person and property on account of his federal-court activity, causing the
15 economic injuries alleged in ¶ 119 and the physical and emotional injuries
16 alleged herein. Mr. Mackintosh is entitled to recover his damages under
17 42 U.S.C. § 1985(3) and his attorney’s fees and costs under 42 U.S.C. §
18 1988.

19 152C. Defendants Newsom and Bass, and Does 21–130,
20 having knowledge that the wrongs described in ¶ 152B — of which
21 Mr. Mackintosh’s legal demands gave them notice — were being
22 committed and were about to continue, and having the power to
23 prevent or to aid in preventing them (¶¶ 17–18, 35–36, 87, 92,
24 122), neglected and refused to do so, in violation of 42 U.S.C. § 1986.
25 As to conduct within one year of the filing of this Complaint — including
26 the July 10–11, 2026 stop, arrest, impoundment, and their continuing
27 effects — Mr. Mackintosh seeks recovery against them under § 1986
28 accordingly.

FIFTEENTH CLAIM FOR RELIEF
(42 U.S.C. § 1983, Sixth and Fourteenth Amendments:
Punishment Without Adjudication of Guilt,
Punishment of Inability to Pay,
Deprivation of Property Without a Hearing,
and Deprivation of the Means to Retain Counsel)
(Against All Individual Officer Defendants,
the City of Burbank, the City of Los Angeles, Girard,
and Does 11–20)

152D. Mr. Mackintosh realleges and incorporates ¶¶ 36–83, 96, 103–118, and 140–141. Mr. Mackintosh has never been adjudicated guilty of any offense arising from the four stops. No jury has found him guilty, and no court has entered a judgment of conviction against him, in connection with any of these events; Under the Due Process Clause of the Fourteenth Amendment, a person who has not been adjudicated guilty may not be punished at all: punishment may follow only an adjudication of guilt in accordance with due process of law. *Bell v. Wolfish*, 441 U.S. 520, 535–37 (1979); *Kingsley v. Hendrickson*, 576 U.S. 389 (2015). Yet the conduct alleged herein imposed punishment before and without any adjudication: the strip search and forced paper clothing inflicted, in the officers’ own framing, “as punishment” for remaining silent (¶ 67); the overnight jailing on citation-level allegations (¶ 66); the seizure and retention of his home, income, records, and dog (¶¶ 62A–64, 70–71); the escalating fees and holds that stripped and eroded his savings (¶¶ 79–83); and an arrest record that by itself threatens the termination of his remaining employment (¶¶ 75, 95–96). What the Constitution reserves for the convicted was imposed on a man convicted of nothing.

1 152E. The Scheme also punishes poverty itself. The Supreme
2 Court has held that the government may not punish a person for
3 failure to pay without first inquiring into the reasons for nonpayment
4 and considering whether the failure was willful. *Bearden v. Georgia*,
5 461 U.S. 660, 667–72 (1983). Here, no Defendant ever inquired
6 whether Mr. Mackintosh could pay: the DMV attached amounts and
7 imposed holds automatically (§§ 79, 82A); the registration could
8 not be completed because the Scheme itself had consumed the repair
9 money (§§ 60A, 76A); the impound fees escalated across a weekend when
10 payment was structurally impossible (§ 70); and each inability to pay was
11 treated not as a reason for inquiry but as the trigger for the next
12 exaction — a system in which poverty is the offense and deeper poverty
13 is the sentence.

14 152F. Finally, due process requires notice and a meaningful
15 opportunity to be heard before the government works a serious
16 deprivation of property. *Fuentes v. Shevin*, 407 U.S. 67, 80–82
17 (1972); *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976).
18 Mr. Mackintosh was afforded the opposite: a \$1,580 pay-first
19 precondition to any hearing at all (§ 81); a mailed declaration returned
20 as undeliverable (§ 82); scheduled hearings cancelled or terminated
21 at the last minute (§ 82A); and the seizure and retention of his residence
22 and livelihood with no pre- or prompt post-deprivation hearing of any
23 kind (§ 70). As a direct and proximate result of the violations alleged in
24 §§ 152D–152F, Mr. Mackintosh suffered the punitive, financial,
25 dignitary, and property harms alleged herein, recoverable under 42 U.S.C.
26 § 1983, and he seeks the declaratory and injunctive relief stated in the
27 Prayer.

28 152G. The Scheme also deprived Mr. Mackintosh of the means to

1 retain counsel. The Sixth Amendment guarantees a criminal defendant the
2 assistance of counsel of his choice, and the government violates that right
3 when it wrongfully deprives him of the untainted funds needed to retain
4 counsel. *Luis v. United States*, 578 U.S. 5 (2016); *United States v.*
5 *Gonzalez-Lopez*, 548 U.S. 140, 147–48 (2006) (deprivation of counsel of
6 choice is structural error). As alleged in ¶ 71A, Defendants’ exactions
7 consumed, before any adjudication, the funds with which Mr. Mackintosh
8 would have retained defense counsel, leaving him to face a charge their
9 own officers initiated without representation. Taking a man’s money and
10 then charging him is punishment first and process second — it coerces
11 pleas from the poor and the innocent alike — and as applied to Mr.
12 Mackintosh it violated the Sixth and Fourteenth Amendments, actionable
13 under 42 U.S.C. § 1983, and forms a further part of the pattern alleged in
14 ¶¶ 96 and 103–118.

15 ADMINISTRATIVE PREREQUISITES

16 153. Government Claims Act compliance (Cal. Gov. Code
17 §§ 810 et seq., 945.4; enacted September 20, 1963): Between
18 approximately June 2024 and December 2025, Mr. Mackintosh
19 presented written claims under the Government Claims Program
20 administered by the California Department of General Services
21 (“DGS”) using USPS and certified tracking, concerning the first, second,
22 and third stops, which were ignored entirely. No written rejection
23 was received, and those claims are therefore deemed denied by operation
24 of law. Mr. Mackintosh will present any further or supplemental claims
25 required — including claims to the City of Burbank and the City of Los
26 Angeles concerning the incidents alleged herein — and will seek leave to
27 present a late claim under Cal. Gov. Code § 911.4 to the extent any is
28 required.

PRAYER FOR RELIEF

WHEREFORE, Mr. Mackintosh prays for judgment as follows:

1. Compensatory damages according to proof, including: (a) economic losses of not less than approximately \$270,000 and continuing (§ 119), trebled on the First and Second Claims for Relief under 18 U.S.C. § 1964(c) to not less than \$810,000; and (b) general damages for physical injury, pain, and the emotional distress and duress inflicted over the period spanning 2017 to the present as alleged herein (§§ 35C–35D), in an amount to be determined by the jury and reasonably estimated at not less than \$3.33 million — for an aggregate compensatory award of not less than \$4.1 million;

2. Treble damages on the First and Second Claims for Relief under 18 U.S.C. § 1964(c);

3. Statutory damages and civil penalties under Cal. Civ. Code §§ 52 and 52.1;

4. Punitive damages against the individual Defendants;

5. Return of all property still withheld, or its value — including the debit card seized from Mr. Mackintosh and every item removed from the vehicle or the preservation bags and not returned — together with an order requiring Defendants to preserve intact any data, images, or forensic copies taken from his telephones, devices, or effects, and to make no further access to, use of, or disclosure of their contents;

6. Costs of suit and attorney's fees as permitted by 42 U.S.C. § 1988, 18 U.S.C. § 1964(c), and Cal. Civ. Code § 52.1;

7. A declaration that the practices alleged herein, as applied to Mr. Mackintosh, violate the First, Fourth, Fifth, Eighth, and Fourteenth Amendments to the United States Constitution, and preliminary and permanent injunctive relief under 42 U.S.C. § 1983 and Cal. Civ. Code

1 § 52.1; (a) barring Defendants from surveilling, tracking, stopping, citing,
2 arresting, or impounding Mr. Mackintosh or his vehicle based on the
3 disputed plate-display and registration conditions — including while he
4 drives under the DMV-issued operating permit to complete the smog
5 repair and clear the vehicle's emissions codes — while this action is
6 pending; (b) directing Defendant Gordon to release the registration hold
7 or, at minimum, to issue written, unambiguous temporary operating
8 authorization so Mr. Mackintosh may lawfully drive, work, and complete
9 registration; (c) barring further collection on the disputed amounts
10 pending adjudication; and (d) requiring preservation of all evidence, data,
11 and forensic copies as stated in Prayer ¶ 5 — relief necessary to prevent
12 the irreparable harm of a further impoundment and of losing his vehicle,
13 residence, and workplace to third-party repossession precipitated by
14 Defendants' interference with the income that services the conditional sale
15 contract (¶¶ 24, 76B);

16 8. An order of referral to the United States Attorney and the
17 United States Department of Justice, Civil Rights Division, should the
18 Court find that the record before it warrants such a referral;

19 9. Such other and further relief as the Court deems just and
20 proper.

21 **DEMAND FOR JURY TRIAL**

22 Mr. Mackintosh hereby demands a jury trial of all issues in this
23 action triable as of right by a jury.

24 Dated: July 23, 2026

Respectfully Submitted,

25 
26 Adam J. Mackintosh (*Pro Se*)
27
28

EXHIBIT L

COURT CODE: 19312

PHONE: (866) 561-9742

NEW COURT CODE:

NAME/ADDRESS: CITY OF LOS ANGELES

DEPARTMENT OF TRANSPORTATION

100 S MAIN STREET 10TH FLOOR

LOS ANGELES, CA

90012

COURT CODE:

PHONE:

NEW COURT CODE:

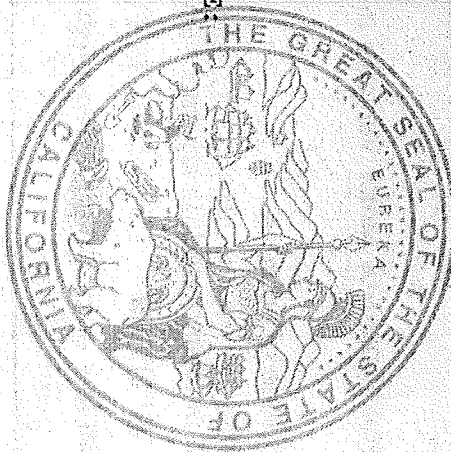
NAME/ADDRESS:

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NEW COURT CODE:

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DMVA-HZ4

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H00 I HZ4 P PCVS 61624215 12
*** P A R K / T O L L C I T A T I O N D I S P O S I T I O N ***
0 082924 1625 VDA

LAST TRF/ACQSTN/FIRST OPER/FEE DUE DATE-
LICENSE NO: 9LIB205 REPO DATE-

CURR EXP DATE- 12/14/24
NEW EXP DATE: 12/14/24

#	C VIOLDT	CITATION NUMBER	AGNCY AMT	#	C VIOLDT	CITATION NUMBER	AGNCY AMT
01	041824	3	19312 240	02	050224	2	19312 200

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TOTAL DISP CD 5-\$ + TOTAL BLANK DISP CD-\$ 440 = TOTAL DUE-\$ 440

ENTER PAY DMV-PF1 PAY DMV/RDF(EV)-PF2 RDF(EV) FALLBACK RESTART CANCEL

2.15.2.1

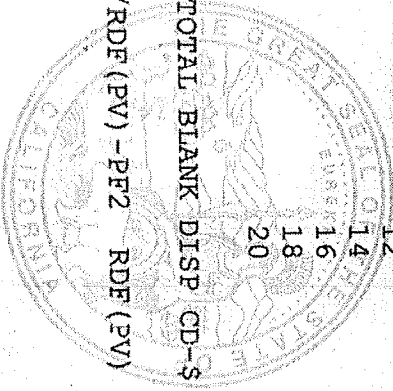


EXHIBIT M



LICENSE NUMBER

NOTICE OF DELINQUENT RENEWAL

Registration or Certification of Planned Nonoperation (PNO) and late payment are due. Our records show that you have not renewed the vehicle's registration or filed a PNO with the \$27 filing fee. California law requires all vehicle owners to register or, if the vehicle is not being operated, parked or towed upon a street or highway, to place a nonoperation status on file before the vehicle's registration expiration date. A PNO may be filed with a payment of a late filing fee, up to ninety days after the vehicle expiration date. After ninety days, a PNO cannot be filed.

To file Planned Nonoperational (PNO) status

- * Determine PNO eligibility. Vehicle has not been operated (driven, moved, or parked on a street or highway) after the registration expiration date of 12/14/2024.
- * If eligible, check the PNO box and pay the PNO amount due. Note: PNO is valid until the vehicle is operated.

To Renew the vehicle registration

- * Pay the renewal amount due on the bottom portion of this notice.
 - * RENEWAL or PNO online, by kiosk or phone (1-800-777-0133) is an option available to you.
 - * Your Renewal Identification Number is 075100.
 - * DMV's Internet address is WWW.DMV.CA.GOV
- OR Return by MAIL.

Fees and Tax Information for Renewal

REGISTRATION FEE	\$171
LICENSE FEE (Maybe an income tax deduction)	\$123
WEIGHT FEE (This may reflect an increase authorized by statute effective 1/1/95)	\$0
COUNTY/DISTRICT FEES (Your county or district has requested these fees)	\$11
SPECIAL PLATE FEE	\$0
OWNER RESPONSIBILITY FEE	\$0
PENALTY FEE	\$134

PARK/TOLL VIOLATIONS	DATE	AGENCY	VIOLATION NUMBER	AGENCY CODE	
	04/18/24	LOS ANGELES		19312	\$240
	05/02/24	LOS ANGELES		19312	\$200

Total Late Payment Due Now

PNO * RENEWAL
\$131 \$879

* PNO is not allowed if postmarked after 03/14/2025
NOTE: Late penalties will be added after one year.

DETACH AND RETURN

PNO - Planned Nonoperation
Change of Address (see back)
For DMV Use Only

2

P

LICENSE NUMBER	MAKE
DMV USE	DUE DATE
	12/14/2024
	AMOUNT DUE
	\$879

MAKE PAYMENT TO:

MACKINTOSH ADAM JOHN

DMV RENEWAL
P.O. BOX 942897
SACRAMENTO CA 94297-0897



EXHIBIT N



Issued To:
ADAM MACKINTOSH

Receipt Date: 04/26/2021 10:57 AM
Receipt Number: 2832514
Tow Reference Number: 20210426A0015
Status: RELEASED
Release Authorized Until: 04/26/2021 03:03 PM
Release Authorized By: JuanC

Authorized By SF Municipal Transportation Agency
Stored By City and County of San Francisco Impound
 450 7th Street
 San Francisco, CA 94103
 (415) 865-8200

VEHICLE	TOW	LOT
ID:	Dispatched Time: 04/26/2021 07:58 AM	Name: 450 7th Street
Make:	On Site Time: 04/26/2021 08:03 AM	
Model:	Completed Time: 04/26/2021 08:38 AM	
Year:	Tow Origin:	
Color:	Equipment Type: Reg	
Body:	Tow Reason: 500/500E-500/500E - Blocking Driveway	
License:	Tow Destination:	
VIN:		

Fee Description	Qty.	Price	Total
City Admin Fee - Excluding Citations	1	\$318.00	\$318.00
Tow Passenger Vehicle	1	\$256.00	\$256.00
City Admin Fee - First Tow Reduction	1	-\$50.00	-\$50.00
		Total:	\$524.00
Needs To be Applied -> First Tow Dis.			
		DEBIT CARD:	\$524.00
		Total Paid:	\$524.00
		Balance:	\$0.00

- This receipt is proof of payment of vehicle towing and storage fees paid to the City and County of San Francisco for violations of on-street parking ordinances under the San Francisco Transportation Code.
- You may contest the towing of your vehicle within 30 days from date of tow, as follows:
 - For tows initiated by SFMTA, go to www.sfmta.com/ContestTow, call (415) 701-5400, OR go to the SFMTA Customer Service Center at 11 South Van Ness Avenue, San Francisco.
 - For tows initiated by SFPD, go to www.sanfranciscopolice.org/towed-vehicle-information, call (415) 553-1618, OR go to the SFPD at 850 Bryant Street, Room 154, San Francisco.
- Hours: 9am to 3pm, Monday through Friday
- Customer must pay separately any amounts owing for parking citations.
- If you qualify for, but did not receive, reduced towing or storage fees for First Tow or Low-Income customers, you may seek reimbursement of a portion of the fees paid. You must seek reimbursement within 30 days from date of tow. For more information, go to www.sfmta.com/FirstTow.

Signature: _____ **Date:** _____

Upon request, you are entitled to receive a copy of the Towing Fees and Access Notice

EXHIBIT O

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SFMTA

NOTICE OF PARKING CITATION

The vehicle described below is illegally parked in violation of the section referenced below.

Payment or request for administrative review is required within 21 days or further penalties may be assessed.

CITATION # **938455814**

FROM: 000100 41855495

Date		Time Issued	
4/26/21		7:54 AM	
License Number		Tag Number	
State	Month	Year	
CA	10	2021	
VIN			
Vehicle Make	Body	Color	
Location		Meter #	
Street			
Officer	Badge #		
S.L.	0093		
IN VIOLATION OF SECTION: VC22500E DRIVER AT			
AMOUNT DUE:		\$110.00	
COMMENTS:			
FINE INCLUDES MANDATED STATE FEES TWELVE INCH PASS DROP CURB			
CERTIFICATE OF CORRECTION			
STAR HO			
OFFICER'S SIGNATURE CVC 4000(a) 5200 5201(a) 5201(b) 5201(c) 5201			

REMOVE THIS STUB BEFORE MAILING

EXHIBIT Q

Citation Number	Issue Date	Violation Code	Violation	Amt. Due
1.	02-05-2021	TRC.2.22	Street Clean	\$212
2.	04-07-2021	V22500I	Bus Zone	\$479
3.	04-26-2021	V22500E	Driveway	\$110
4.	09-09-2021	V22500H	Double Park	\$110

EXHIBIT R



Citation Details

About the citation:

Citation Number	Issue Date	Due Date	Amount Due
	04/07/2021	05/19/2021	\$350.00

About the violation:

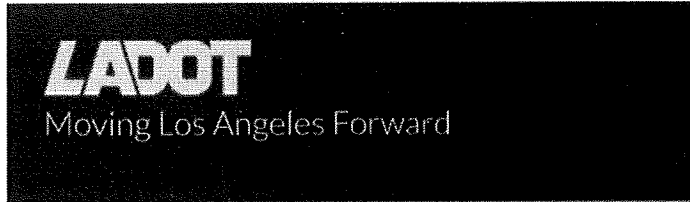
Violation Code	Description	Photos
V225001	BUS ZONE	Citation image(s)

Information

Initial Review period for this citation is still open. You still have the option to protest it.

Fee Schedule	Amount	Date Applied
Fine	\$350.00	04/07/2021
Penalty 1:	\$0.00	
Penalty 2:	\$0.00	
Special Collections Fee:	\$0.00	
Paid:	\$0.00	
Total Due:	\$350.00	

EXHIBIT S



Citation

You have a total of **1** citation(s) on your license plate.

The amount of the citation entered is: **\$171.00**

The total amount of your citation(s) is: **\$173.00**

There is a processing fee of **\$ 2.00**

Please select from the following:

☐ I would like to pay for this citation only.

Please note: PVB accepts partial payments; however, it does on the citation.

Notices will continue to be sent and any DMV hold on your v place until the citation has been paid in full.

<u>Citation Number</u>	<u>Issue Date</u>	<u>Violation</u>	<u>Location</u>
	05/02/2024	8069B NO PARK ST CLN	

Total Payment Including

Submit

Back

Cancel

EXHIBIT T

CITY OF LOS ANGELES
PARKING VIOLATION

PARKING VIOLATION
PAYMENT OPTIONS

CITATION#		Offence Date		Offence Time	Time Marked
		5/2/2024		9:45 AM	
State	License Number				
CA					
Month	Year	Vehicle Make	Color	Type	
Meter # PPD	Serial No.	Beat	Agency		
	2889	159	51		
Location					
IN VIOLATION OF SECTION:					
LAMC- 80.69B					
NO PARK/STREET CLEAN					
AMOUNT DUE:		\$73.00			
COMMENTS:					
8A-11A THURSDAY. APRX ADDR.					

SEE REVERSE SIDE FOR CONTACT INFORMATION.

Payment is required within 21 calendar days from above issuance date.

Payment plans are available for indigent and eligible low income customers. If you are experiencing homelessness, please inquire about the Community Assistance Parking Program (CAPP).

EXHIBIT U

UNIVERSITY OF CALIFORNIA POLICE DEPARTMENT
LOS ANGELES

P

NOTICE TO:
☐ APPEAR IN COURT AT 8.30 AM ON:
OR
☐ RESPOND TO CITATION BEFORE:
DATE: ____/____/____
See back for detailed instructions

ACT BY THIS DATE TO AVOID A WARRANT OR ADDED FEES

☐ To be noted
Date of Violation (month/day/yy) _____
Name (first, middle, last) _____
Phone No. _____
State _____ Reg. (month/yy) _____ Year of Veh. _____ Make _____
Reason for Stop _____

CITATION DETAILS ☐ Booking Required (see reverse)

Code/Section	Description	M = Misdemeanor I = Infraction (Circled)
☐ YQN	12500 VC	M I
☐ YQN	12500 VC	M I
☐ YQN	12500 VC	M I
☐ YQN	12500 VC	M I

Approx. Speed/PF/Max Speed _____ Veh. Limit _____ Safe Speed _____ Radar/Lidar _____ ☐ Commercial Veh. (VC § 15210c)
Location of Violation _____
City/County of Occurrence _____ Agency Case No. _____
Comments (weather, road, traffic conditions) _____
☐ Violations not committed in my presence, declared on information and belief (VC § 40600)
I declare under penalty of perjury under the laws of the State of CA that the foregoing is true and correct.
DECL. DATE _____ ARRESTING OR CITING OFFICER _____ SERIAL NO. _____
DECL. DATE _____ ARRESTING OFFICER, (if different from above) _____ SERIAL NO. _____
I promise to act by the date at the top of this citation. Signing DOES NOT admit guilt.
CELLPHONE - OPTIONAL (may be used for reminders) _____ EMAIL - OPTIONAL (may be used for reminders) _____
X _____
SIGNATURE _____

DEFENDANT COPY | FORM INFO
Continuation form ☐

Form Adopted for Mandatory Use
Judicial Council of California
TR-130, Traffic/Nontraffic Notice to Appear
(Rev. Jan. 1, 2024)
SEE REVERSE

P110763

1997

Vehicle Code: §54050(b); 40513(b)
40522, 40600; Pen. Code: §853.9

EXHIBIT V

LEGAL NOTICE:

TO: City of Los Angeles 1575 Westwood Blvd. Suite #100B Los Angeles, CA 90024	DATE: 04/18/2024 STATE: CALIFORNIA
--	---------------------------------------

FROM: Adam Mackintosh	[REDACTED]
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REQUEST:

- i. Dismissal of parking citation [REDACTED] 3.

EVIDENCE:

- ii. See Exhibits 1, 2, 3 and 4. See also color Exhibits 5, 6 and 7.

After reviewing video and photographic evidence, this citation is invalid and or unenforceable because the curb appears to be available for parking and there is no indication of a "red zone" and or "no parking sign or markings." The attached evidence in form of exhibits below supports a dismissal of this citation in its entirety.

In addition, its presumed LADOT and its Parking Enforcement Officers in California are colluding with the Defendant's named in my civil Racketeer Influenced and Corrupt

1 These circumstances are well known to the RICO Defendants. Furthermore, a case can be
2 made in a court of law that LADOT and the City of Los Angeles implementation of
3 unreasonable high-cost tickets and cyber-surveillance targeting schemes has significantly
4 contributed to the homelessness crisis in California by displacing people onto the streets
5 from their car, who use their car as shelter. This happens in collusion between LADOT,
6 DMV and CHP and their public officers to (1) ticket, (2) tow, (3) block registration and (4)
7 other restrictive policies to (5) auction off cars and property to put (6) Californian's in the
streets for profit to enrich city leaders and those associated to them.

8 Specifically, the LADOT and the City of Los Angeles acknowledged, through their
9 own admission, that their deliberate appropriation of funds and property from individuals
10 experiencing homelessness who live in their car, continues causing homelessness, as indicated
11 by statements made on citations, "if you are experiencing homelessness, please inquire about
12 our Community Assistance Parking Program (CAPP)." Despite being very well aware of
13 these facts, Governor Gavin Newsom, the Mayor of the City of Los Angeles, city managers,
14 and other relevant authorities still appropriated \$10's of billions of dollars from tax payers
15 and the federal government to "address the homelessness crisis in California," while "they
16 are knowingly causing homelessness," as evidenced by the citations issued by LADOT and
17 the targeting of individuals in situations similar to mine across California. The collective
conduct above constitutes as Racketeering creating California into a RICO Enterprise.

18 **SIGNED AND DATED.**

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CITY OF LOS ANGELES
PARKING VIOLATION



CITATION# 45		
Offence Date	Offence Time	Time Marked
4/18/2024	6:14 AM	

Month	Year	Vehicle Make	Color	Type
				PA
Meter#/PPD	Serial No.	Beat	Agency	
	3018	138B	51	

IN VIOLATION OF SECTION: LAMC 80.56E4 RED ZONE
AMOUNT DUE : \$ 93.00
COMMENTS: RIGHT SIDE OF VEHICLE PARKED IN RED GP NA UA, APPROX ADDRESS



SEE REVERSE SIDE FOR CONTACT INFORMATION.

Payment is required within 21 calendar days from above
issuance date.

Payment plans are available for indigent and eligible low
income customers. If you are experiencing homelessness,
please inquire about the Community Assistance Parking
Program (CAPP).

PAYMENT OPTIONS

Pay-by-Web or Pay-by-Phone

www.lacity-parking.org

(866) 561-9742

Visa or MasterCard are accepted.

Pay by Mail:

City of Los Angeles

P.O. Box 30420

Los Angeles, CA 90030-0420

Make checks payable to "City of Los Angeles" and write the citation number on the check.

In person at the following locations: Monday-Friday, 09:00 am—05:00pm

A. 312 W. 2nd St., L.A., CA 90012

B. 3333 Wilshire Blvd., Suite 3337, L.A., CA 90010

C. 1575 Westwood Blvd., Suite #100B, L.A., CA 90024

D. 6309 Van Nuys Blvd., Room 103, Van Nuys, CA 91401

WARNING: FAILURE TO PAY FINES MAY CAUSE SEIZURE OF VEHICLES (CVC 22651.7).

FINE WILL INCREASE FOR LATE PAYMENTS

The Department of Motor Vehicles may refuse renewal of registration for failure of payment (CVC 4760[a][1]).

CONTESTING CITATION:

You have 21 calendar days (CVC 40202) from the date this citation was issued to pay or contest. More information can be found on the website or by calling number listed below. You will be notified by mail of the results.

TELEPHONE:

(866) 561-9742 or (213) 623-7046 TTY (8 a.m.-5 p.m.)

Monday-Friday

To pay with your smartphone, scan the QR Code and get the free Pay Tix app.

EXHIBIT W

lacourt.org/trafficDL/ui/trafficOS.aspx?s=2&language=1

Ticket Number: P110763	Law Enforcement Agency: University Of California Los Angeles
Name:	ADAM JOHN MACINTOSH
Filing Court:	Beverly Hills Courthouse 9355 Burton Way, Beverly Hills, CA 90210 (213)742-6648
Violation Date:	8/28/2024
Due Date:	1/3/2025
Case Status:	Open

afficDL/ui/trafficOS.aspx?s=2&language=1

Ticket Number:
P110763

Law Enforcement Agency:
University Of California Los Angeles

Name:

ADAM JOHN MACINTOSH

Filing Court:

Beverly Hills Courthouse
9355 Burton Way, Beverly Hills, CA 90210
(213)742-6648

Violation Date:

8/28/2024

Due Date:

1/3/2025

Case Status:

Open

Your ticket qualifies for the following online transaction(s). Select the transaction you would like an submit button.

- ☐ Pay and Close Your Ticket - The amount due is \$752.00 plus an online transaction fee of \$5.00 amount.
- ☐ Enroll in a Payment Plan - The initial payment will include an online transaction fee* of \$5.00.
- ☒ Request an Extension of the Due Date on Your Ticket - The extension date will be 4/3/2025.
- ☐ Court Date Reservation for Arraignment Only - No Trials - Select a time preference below.
 - ☐ AM ☐ PM ☐ Night Court ☐ No Preference

Ineligible transaction(s):

Schedule your Remote Appearance - What are the qualifications?

Request Traffic School - What are the qualifications?

Make a Partial Payment to a Court Ordered Fine - What are the qualifications?

Make the Payment after you are Enrolled in Traffic Payment Plan - What are the qualifications?

Request an Extension to pay your fine - What are the qualifications?

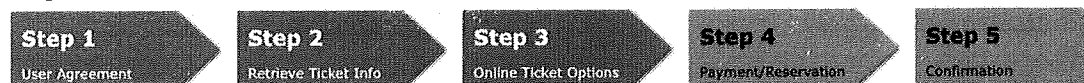
Request an Extension to complete Traffic School - What are the qualifications?

* In order to provide electronic public access to court information, the Los Angeles Superior Court incurs technology development operational expenses. Pursuant to California Rule of Court 2.506 and Government Code Section 68150(h)2.

The Los Angeles Superior Court may impose fees for the costs of providing access to its electronic records. This fee is non-refundable.

 We are now retrieving your requested information. Please be patient while your information is processed. This process may take up to several minutes to complete.

ONLINE SERVICES

Eligibility List**Progress:**

Ticket Number: P111145	Law Enforcement Agency: University Of California Los Angeles
Name:	ADAM MACKINTOSH
Filing Court:	Beverly Hills Courthouse 9355 Burton Way, Beverly Hills, CA 90210 (213)742-6648
Violation Date:	3/3/2025
Due Date:	6/2/2025
Case Status:	Open

Your ticket qualifies for the following online transaction(s). Select the transaction you would like and click on the submit button.

- ☐ Pay and Close Your Ticket - The amount due is \$828.00 plus an online transaction fee of \$5.00 will be added to this amount.
- ☐ Enroll in a Payment Plan - The initial payment will include an online transaction fee* of \$5.00.
- ☐ Request an Extension of the Due Date on Your Ticket - The extension date will be 9/1/2025.
- ☐ Court Date Reservation for Arraignment Only - No Trials - Select a time preference below.
☐ AM ☐ PM ☐ Night Court ☐ No Preference

Ineligible transaction(s):

Check-in for Remote Appearance - What are the qualifications?

Request Traffic School - What are the qualifications?

Make a Partial Payment to a Court Ordered Fine - What are the qualifications?

Make the Payment after you are Enrolled in Traffic Payment Plan - What are the qualifications?

Request an Extension to pay your fine - What are the qualifications?

EXHIBIT X

**City of Sacramento
Notice of
Parking Violation**

PARKING CITATION

Issue No. 605899106	
Date WED 11/01/2017	Time 01:18PM
Officer Name ORTEGA	Officer ID 9327
Agency PE - SACRAMENTO	Date 11
Location 2208 13TH ST	

Violation		
Code: CVC 22500E		
PARKING BLOCKING A DRIVEWAY		
PARKING BLOCKING A DRIVEWAY	State Surcharge	Total Amount Due Now
\$50.00	\$12.50	\$62.50

Vehicle	
License No. 6VBM155	State Exp. CA 11/17
VIN NV (last 4 digits)	Type PAS
Make LEXS	Color GRY
Body Style 4 DOOR	

Remarks UNATT VEH PKED BLOCKING DRIVEWAY C

CITATION MAY BE SUPPORTED BY PHOTOGRAPHS. ANY PHOTO TAKEN IS VIEWABLE AT WWW.SACPARK.ORG

Failure to respond to 3 or more outstanding violations may result in the immobilization and towing of your vehicle pursuant to C.V.C. 22651.7 and/or 22651(3). Responsibility for towing, storage, and immobilization fees must be paid by the vehicle owner or person in control of the vehicle. Registration and equipment violations require proof of correction: verification by a police officer, a California Highway Patrol Officer, or by any Department of Motor Vehicle representative.

6058991060062500

EXHIBIT Y

City of Sacramento Notice of Parking Violation

PARKING CITATION

Issue No. 60 [REDACTED]	Time 03:52PM
Date FRI [REDACTED]/2017	Officer ID 9 [REDACTED]
Officer Name BOWMAN	Beck 14 [REDACTED]
Agency PE - SACRAMENTO	
Location 2 [REDACTED]	

Violation

Code: 10.48.150A
RESIDENTIAL PERMIT PARKING

RESIDENTIAL PERMIT PARKING	State Surcharge	Total Amount Due Now
\$40.00	\$12.50	\$52.50

Vehicle

License No. 4 [REDACTED]	State CA	Exp 08/17	Type PAS
VIN 4 [REDACTED] (digits)		Color GRY	
Make NISS	Body Style 4 DOOR		

Remarks

LNATT NO DP LRTMKD 1436 PSTD 1HR EXC PERMIT
NO U PERMIT RES/VISITOR VISIBLE

CITATION MAY BE SUPPORTED BY PHOTOGRAPHS. ANY
PHOTO TAKEN IS VIEWABLE AT WWW.SACPARK.ORG

Failure to respond to 5 or more outstanding violations may result in the immobilization and/or
towing of the vehicle. For more information, please contact the City of Sacramento Parking Department at (916) 498-5509.

61985509

EXHIBIT Z

clear instructions to park in an open spot. I believe they were intentionally getting tickets
to hurt Adam and iHug financially, as they kept asking Adam to pay for the tickets.

2051



Adam 3:50 PM

File from iOS



SMCTY.002

FINAL NOTICE BEFORE ASSIGNMENT TO COLLECTIONS

CITATION NO.	ISSUE DATE	VIOLATION SECT	VIOLATION ADDRESS	AMT. DUE
6058 [REDACTED]	12-04-17	10-46-150A	1311 V ST	\$107.50

Notice Date: 1/16/2018

DUE WITHIN 14 DAYS OF NOTICE DATE

AMOUNT DUE INCLUDES A STATE MANDATED SURCHARGE.

Our records indicate that your Parking Citation remains unpaid and is now delinquent! Failure to make payment within 14 days of this notice will result in additional action, which may include any or all of the following:

1. Increase in penalties including collection fees
2. Withholding of vehicle registration
3. Assignment to collection agency
4. Vehicle impoundment or immobilization
5. Garnishment of tax or lottery winnings

DO NOT MAIL CASH

FOR INFORMATION: 1-(916) 808-8500

PAY ONLINE AT: www.sacpark.org

PAY BY PHONE AT: 1-(888) 266-1314

OWNER
David [REDACTED]

LICENSE NO.
GMN [REDACTED]

MAKE-TYPE AND COLOR
HOND 4 DOOR BLK

2000 [REDACTED]





POSTAGE REQUIRED

PRESS FIRMLY TO SEAL



EP14F October 2023
OD: 12 1/2 x 9 1/2

PS0000C 000014

UNITED STATES POSTAL SERVICE® | **PRIORITY MAIL**

Expected delivery date specified for domestic use.
Domestic shipments include \$100 of insurance (restrictions apply).
SPS Tracking® service included for domestic and many international destinations.
Limited international insurance.**
When used internationally, a customs declaration form is required.
Insurance does not cover certain items. For details regarding claims exclusions see the
Domestic Mail Manual at <http://pe.usps.com>.
See International Mail Manual at <http://pe.usps.com> for availability and limitations of coverage.

To schedule free Package Pickup,
scan the QR code.



[USPS.COM/PICKUP](http://usps.com/pickup)



LAT RATE ENVELOPE
ONE RATE ■ ANY WEIGHT

TRACKED ■ INSURED

EP14F October 2023
OD: 12 1/2 x 9 1/2

PS0000C 000014

	UNITED STATES POSTAL SERVICE®	Click-N-Ship®
usps.com	U.S. POSTAGE	U.S. POSTAGE PAID
\$11.05	07/26/2026	Mailed from 9423 157448042652
P	PRIORITY MAIL®	
Created: 2024-09-24 Length: 11.5 in RDC 03 C058		
MACKINTOSH ADAM 14320 VENTURA BLVD SHERMAN OAKS CA 91423-2717		
FEDERAL COURT HOUSE 350 W 1ST ST LOS ANGELES CA 90012-4536		
USPS TRACKING # 9405 5301 0835 5430 9377 20		
Clerks Office New Filing		