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8 ESTATE OF BRYAN DEBBS
9 and SHELLEY DEBBS

9 UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA
11 SACRAMENTO DIVISION

12 ESTATE OF BRYAN DEBBS and SHELLEY
13 DEBBS,

14 Plaintiffs,

15 vs.

16 COUNTY OF SACRAMENTO, SACRAMENTO
17 COUNTY SHERIFF'S DEPARTMENT,
18 SCOTT R. JONES, and DOE 1 to 50,

18 Defendants,

19 and

20 RIGOBERTO ARRIAGA,

21 Nominal Defendant.

Case No.

**COMPLAINT FOR VIOLATION OF
CIVIL AND CONSTITUTIONAL RIGHTS**

DEMAND FOR JURY TRIAL

22 **INTRODUCTION**

23 BRYAN DEBBS, a mentally-ill inmate at the Sacramento County Main Jail, was housed by jail
24 staff employed by the COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S
25 DEPARTMENT, and Sheriff SCOTT R. JONES, with a violent inmate who murdered BRYAN DEBBS.

26 **JURISDICTION & VENUE**

27 1. This Court has jurisdiction over the federal claims under 28 U.S.C. § 1331 (in that they
28 arise under the United States Constitution) and 28 U.S.C. § 1343(a)(3) (in that the action is brought to

1 address deprivations, under color of state authority, of rights, privileges, and immunities protected by the
2 U.S. Constitution). This Court has supplemental jurisdiction of the state claims under 28 U.S.C. § 1367.

3 2. Venue is proper in the United State District Court for the Eastern District of California
4 pursuant to 28 U.S.C. § 1391(b) because Defendants are located in the Eastern District of California and
5 because many of the acts and/or omissions described herein occurred in the Eastern District of California.

6 3. Intradistrict venue is proper in the Sacramento Division of the Eastern District of
7 California pursuant to E.D. Cal. L.R. 120(d) because the claims asserted herein arise from acts and/or
8 omissions which occurred in the County of Sacramento, California.

9 **EXHAUSTION**

10 4. Plaintiff ESTATE OF BRYAN DEBBS and SHELLEY DEBBS filed a government
11 claim with COUNTY OF SACRAMENTO and SACRAMENTO COUNTY SHERIFF'S
12 DEPARTMENT regarding the claims asserted herein on January 6, 2020. No response to the government
13 claim was provided. The government claim was rejected by February 20, 2020, as a matter of law. *See*
14 Cal. Gov. Code § 912.4(c).

15 **PARTIES**

16 5. Plaintiff ESTATE OF BRYAN DEBBS, the decedent ("BRYAN DEBBS"), brings this
17 action pursuant to Cal. Code Civ. Proc. § 377.30. Plaintiff SHELLEY DEBBS brings this action on
18 behalf of Plaintiff ESTATE OF BRYAN DEBBS, as a successors-in-interest. Plaintiff SHELLEY
19 DEBBS's declaration regarding her status as BRYAN DEBBS's successor-in-interest is attached,
20 pursuant to Cal. Code Civ. Proc. § 377.32.

21 6. Plaintiff SHELLEY DEBBS is a resident of the State of California, County of
22 Sacramento. Plaintiff SHELLEY DEBBS brings this action: (a) on behalf of Plaintiff ESTATE OF
23 BRYAN DEBBS, in her representative capacity as a successor-in-interest; and (b) on behalf of herself, in
24 her individual capacity. Plaintiff SHELLEY DEBBS is the biological mother of BRYAN DEBBS.

25 7. Defendant COUNTY OF SACRAMENTO is a "public entity" within the definition of
26 Cal. Gov. Code § 811.2.

27 8. Defendant SACRAMENTO COUNTY SHERIFF'S DEPARTMENT is a "public entity"
28 within the definition of Cal. Gov. Code § 811.2.

1 9. Defendant SCOTT R. JONES is and was, at all times material herein, a law enforcement
2 officer and the Sheriff for Defendants COUNTY OF SACRAMENTO and SACRAMENTO COUNTY
3 SHERIFF'S DEPARTMENT, acting within the scope of that employment. Defendant SCOTT R. JONES
4 is sued in his individual capacity.

5 10. Defendants DOE 1 to 50 are and/or were agents or employees of Defendants COUNTY
6 OF SACRAMENTO and/or SACRAMENTO COUNTY SHERIFF'S DEPARTMENT and acted within
7 the scope of that agency or employment and under color of state law. The true and correct names of
8 Defendants DOE 1 to 50 are not now known and, as a result, they are sued by their fictitious names and
9 true and correct names will be substituted when ascertained.

10 11. Nominal Defendant RIGOBERTO ARRIAGA is the biological father of BRYAN DEBBS
11 and a successor-in-interest on behalf of Plaintiff ESTATE OF BRYAN DEBBS. Nominal Defendant
12 RIGOBERTO ARRIAGA has declined to participate in this action and is joined as a party solely in a
13 nominal capacity.

14 **GENERAL ALLEGATIONS**

15 12. At all times relevant herein, all wrongful acts described were performed under color of
16 state law and/or in concert with or on behalf of those acting under the color of state law.

17 13. BRYAN DEBBS shared a close relationship and special bond with his mother, Plaintiff
18 SHELLEY DEBBS, prior to his death, which included deep attachments, commitments, and distinctively
19 personal aspects of their lives. Plaintiff SHELLEY DEBBS's relationship with BRYAN DEBBS was
20 typical of a loving mother-son relationship.

21 14. BRYAN DEBBS was a 33-year-old man suffering from mental-illness, including
22 schizophrenia. BRYAN DEBBS had been formally diagnosed with mental-illness, had previously
23 received mental health treatment for his mental illness, and had been on medication.

24 15. BRYAN DEBBS was an inmate in the custody of Defendant SACRAMENTO COUNTY
25 SHERIFF'S DEPARTMENT at the Sacramento County Main Jail.

26 16. BRYAN DEBBS was known by Defendant SACRAMENTO COUNTY SHERIFF'S
27 DEPARTMENT and its officials, including Defendants DOE 1 to 25, to be a vulnerable inmate, due to
28 his mental-illness. On information and belief, BRYAN DEBBS's mental-illness was not accommodated,

1 despite notice of the need to officials, including Defendants DOE 1 to 25.

2 17. BRYAN DEBBS was serving a six-month sentence for prior criminal charges.

3 18. On July 8, 2019, BRYAN DEBBS was brutally attacked by Christian Ento, a fellow
4 inmate at the Sacramento County Main Jail.

5 19. BRYAN DEBBS sustained serious and life-threatening injuries as a result of the attack.

6 20. BRYAN DEBBS was transported to the Sutter Medical Center for treatment.

7 21. On August 3, 2019, BRYAN DEBBS died as a result of his injuries.

8 22. BRYAN DEBBS's death certificate identifies the cause of death as "complications of
9 neck compression."

10 23. Defendant SACRAMENTO COUNTY SHERIFF'S DEPARTMENT and its officials did
11 not disclose that an inmate had been hospitalized, or that he had later died, until a local newspaper started
12 investigating the death. (*See* <<https://www.sacbee.com/news/local/crime/article239123253.html>>.)

13 **POLICY OR CUSTOM ALLEGATIONS**

14 24. Defendant SCOTT R. JONES, acting as Sheriff, was a final policy-making authority for
15 Defendants COUNTY OF SACRAMENTO and SACRAMENTO COUNTY SHERIFF'S
16 DEPARTMENT as it relates to the maintenance and operation of detention facilities, including
17 Sacramento County Jail facilities; training, supervision, and discipline of law enforcement officers acting
18 under his command; and the safekeeping of inmates/prisoners in his custody. *See* Cal. Const., art. XI, §
19 1(b); Cal. Pen. Code § 4000; Cal. Pen. Code § 4006; Cal. Gov. Code § 26605; Cal. Gov. Code § 26610.
20 Defendant SCOTT R. JONES has served as Sheriff since December 2010.

21 25. Defendants DOE 26 to 50 are/were policy-making authorities, based on a delegation of
22 authority, for Defendants COUNTY OF SACRAMENTO and SACRAMENTO COUNTY SHERIFF'S
23 DEPARTMENT as it relates to the maintenance and operation of detention facilities, including
24 Sacramento County Jail facilities, and training, supervision, and discipline of law enforcement officers
25 acting under their command.

26 26. Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S
27 DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50 maintain a policy or custom whereby their
28 personnel, including Defendants DOE 1 to 25, fail to provide necessary medical treatment to inmates

1 housed at Sacramento County Jail facilities; and/or fail to transfer inmates housed at Sacramento County
2 Jail facilities to medical facilities where necessary medical treatment is available, where it is not
3 available in Sacramento County Jail facilities. Specifically, inadequate training and supervision of staff at
4 Sacramento County Jail facilities results in the following deficiencies:

- 5 a. Failure to provide inmates with access to medical care;
- 6 b. Failure to create and implement appropriate mental health treatment plans;
- 7 c. Failure appropriately to assign inmates suffering from mental-illness;
- 8 d. Failure to follow clinical judgments and recommendations;
- 9 e. Failure promptly to evaluate and transfer inmates to a psychiatric hospital who are
10 gravely disabled or at risk of serious harm;
- 11 f. Failure to implement appropriate emergency treatment policies; and/or
- 12 g. Failure appropriately to staff and train personnel at Sacramento County Jail
13 facilities to provide minimally-adequate treatment for inmates suffering from mental-illness.

14 27. These policies or customs proximately caused the violation of BRYAN DEBBS's civil
15 and constitutional rights.

16 28. Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S
17 DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50's deficient policies and customs are evidenced
18 by, on information and belief, their failure to comply with the standards set forth by the National
19 Commission on Correctional Health Care's ("NCCHC") "Standards for Health Services in Jails."

20 29. Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S
21 DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50's deficient policies and customs are evidenced
22 by numerous incidents where vulnerable inmates have been severely injured or killed while under their
23 custody and care, in addition to BRYAN DEBBS, including:

- 24 a. On December 6, 2019, Antonio Thomas, a known mentally-ill inmate, was placed
25 in general population and attacked and severely injured by a fellow inmate at the Sacramento County
26 Main Jail. On January 21, 2020, Mr. Thomas died as a result of his injuries. Defendant SACRAMENTO
27 COUNTY SHERIFF'S DEPARTMENT and its officials did not report Mr. Thomas injuries to his family
28 until well-after it occurred and, even then, officials falsely reported: "Nobody's hurt, nobody's in

1 trouble,” despite the fact that Mr. Thomas was brain-dead and had entered a comatose state which he
2 would never leave. (See <<https://www.sacbee.com/news/local/crime/article239123253.html>> & *Estate of*
3 *Thomas v. County of Sacramento*, E.D. Cal. Case No. 2:20-cv-00903-KJM-DB.)

4 b. On June 16, 2017, Clifton Harris, a gay inmate who had requested accommodation
5 from the jail, was attacked and severely injured by a fellow inmate at the Sacramento County Main Jail,
6 causing him to become comatose. On March 2, 2018, Mr. Harris died as a result of the injuries he
7 sustained. Defendant SACRAMENTO COUNTY SHERIFF’S DEPARTMENT did not inform Mr.
8 Harris’s family that he had been attacked and was in a coma until two weeks after the attack. (See
9 <<https://www.newsreview.com/sacramento/what-happened-to-our-brother/content?oid=26996966>>.)

10 c. On January 16, 2015, Choi Saeteurn, an inmate, was attacked and smothered with
11 a blanket by his cellmate at the Sacramento County Main Jail. Mr. Saeteurn’s motionless body was
12 discovered by jail staff at approximately 5:38 a.m. but jail medical staff did not arrive until
13 approximately 5:52 a.m. with an automated external defibrillator in attempt to resuscitate Mr. Saeteurn.
14 Mr. Saeteurn died from blunt force injuries and asphyxia; he had contusions and lacerations throughout
15 his head and body and fractures to his clavicle and ribs. (See <[https://www.sacda.org/wp-](https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Saeteurn_Choi.pdf)
16 [content/uploads/2019/12/In_Custody_Death_Review_-_Saeteurn_Choi.pdf](https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Saeteurn_Choi.pdf)>.)

17 d. December 14, 2014, Edward Larson, an inmate, was attacked by his cellmate at the
18 Sacramento County Main Jail and died of blunt force injuries. Nearby inmates heard Mr. Larson
19 pleading, “Stop hitting me” or “Quit hitting me,” but no staff came to his aid. Mr. Larson was discovered
20 lying on the ground, motionless and non-responsive, at approximately 3:10 a.m. Jail staff only returned to
21 the cell with medical staff “a couple minutes” after 3:22 a.m. On December 13, 2014, the day before the
22 deadly assault, jail staff noticed red bruises on Mr. Larson’s head but did not report the injuries. (See
23 <[https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Larson_Edward-](https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Larson_Edward-1.pdf)
24 [1.pdf](https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Larson_Edward-1.pdf)>.)

25 e. On March 22, 2012, Carlos Aguirre, an inmate classified as being under protective
26 custody, was attacked by a general population inmate at the Sacramento County Main Jail, when he was
27 required by sheriff’s deputies to travel through a stairwell with general population access, while the staff
28 knew that general population inmates were present and had access to protective custody inmates.

1 Thereafter, Defendant SACRAMENTO COUNTY SHERIFF'S DEPARTMENT and its staff failed
2 adequately to investigate the attack and failed to provide Mr. Aguirre with necessary medical attention.
3 The resulting civil rights lawsuit was settled by Defendant COUNTY OF SACRAMENTO. (*Aguirre v.*
4 *County of Sacramento*, United States District Court, Eastern District of California, Case No. 2:12-cv-
5 02165-TLN-KJN.)

6 30. Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S
7 DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50's deficient policies and customs are evidenced
8 by jail staff's lax supervision of inmates and failure to provide necessary medical treatment, in numerous
9 incidents where inmates were able to attempt and actually commit suicide, including:

10 a. On March 8, 2017, Tom Korrell, an inmate, was able to hang himself using a
11 hand-made ligature fashioned from pieces of a ripped t-shirt at the Sacramento County Main Jail. Mr.
12 Korrell began strangling himself at approximately 12:35 a.m. and his body stopped moving a few
13 minutes later. Mr. Korrell was not discovered by jail staff until nearly an hour later, when Mr. Korrell's
14 cellmate alerted staff at 1:20 a.m. (*See* <[https://www.sacda.org/wp-](https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Korrell_Tom.pdf)
15 [content/uploads/2019/12/In_Custody_Death_Review_-_Korrell_Tom.pdf](https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Korrell_Tom.pdf)>.)

16 b. On January 6, 2017, Jonathan Carroll, an inmate, was able to hang himself using a
17 hand-made ligature fashioned from pieces of string and ripped clothing at the Sacramento County Main
18 Jail. Mr. Carroll was discovered motionless and non-responsive at approximately 4:18 a.m. It is unknown
19 for how long Mr. Carroll had been dead before being discovered, or when jail staff last checked-on Mr.
20 Carroll before he was discovered dead. (*See* <[https://www.sacda.org/wp-](https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Carroll_Jonathan.pdf)
21 [content/uploads/2019/12/In_Custody_Death_Review_-_Carroll_Jonathan.pdf](https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Carroll_Jonathan.pdf)>.)

22 c. On November 2, 2016, Brian Guerin, an inmate, was able to hang himself using a
23 hand-made ligature fashioned from pieces of torn blanket at the Sacramento County Main Jail. Mr.
24 Guerin's body was discovered by jail staff at approximately 3:28 a.m. It is unknown for how long Mr.
25 Guerin had been dead before being discovered, where jail staff last checked his cell more than an hour
26 earlier at approximately 2:20 a.m. (*See* <[https://www.sacda.org/wp-](https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Guerin_Brian.pdf)
27 [content/uploads/2019/12/In_Custody_Death_Review_-_Guerin_Brian.pdf](https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Guerin_Brian.pdf)>.)

28 d. On August 1, 2015, Joshua Gonder, an inmate, was able to hang himself using a

1 hand-made ligature fashioned from pieces of a torn t-shirt at the Sacramento County Main Jail. Mr.
2 Gonder was discovered at approximately 7:07 p.m. Mr. Gonder had covered the surveillance camera in
3 his cell with wet toilet paper prior to hanging himself and, on information and belief, jail staff failed to
4 investigate their inability to surveil Mr. Gonder. (See <[https://www.sacda.org/wp-](https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Gonder_Joshua.pdf)
5 [content/uploads/2019/12/In_Custody_Death_Review_-_Gonder_Joshua.pdf](https://www.sacda.org/wp-content/uploads/2019/12/In_Custody_Death_Review_-_Gonder_Joshua.pdf)>.)

6 31. Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S
7 DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50's deficient policies and customs are evidenced
8 by numerous and significant settlements in actions where indifference to inmates' needs for necessary
9 medical treatment were alleged, including:

10 a. In *Mays v. County of Sacramento*, United States District Court, Eastern District of
11 California, Case No. 2:18-cv-02081-TLN-KJN, the plaintiffs alleged numerous "dangerous, inhumane
12 and degrading conditions" at jail facilities operated by Defendants COUNTY OF SACRAMENTO and
13 SACRAMENTO COUNTY SHERIFF'S DEPARTMENT. Defendant COUNTY OF SACRAMENTO
14 settled the case in June 2019, agreeing to millions of dollars'-worth of changes to jail staffing, facilities,
15 inmate health services, and custodial practices, including the creation and enforcement of polices and
16 trainings that ensure compliance with Americans with Disabilities Act ("ADA") requirements, and
17 improving the delivery of medical care through timely referrals, responses to requests for care and
18 medication disbursement, chronic care treatment plans, appropriate clinic space, and staff training. (See
19 <<https://www.sacbee.com/news/local/article231792088.html>>.)

20 b. In *Estate of Scott v. County of Sacramento*, United States District Court, Eastern
21 District of California, Case No. 2:13-cv-00024-GEB-KJN, the plaintiff died from untreated vomiting
22 which resulted from unchecked bleeding caused by esophageal tears at the Sacramento County Main Jail.
23 The plaintiffs alleged that the decedent was sick and vomiting, coughing and spitting-up blood, from the
24 morning of January 6, 2012, until his death later that evening, but that, despite the decedent's numerous
25 pleas for medical attention made to multiple jail staff members, no medical attention was provided. The
26 resulting civil rights lawsuit was settled by Defendant COUNTY OF SACRAMENTO.

27 c. In *Cain v. County of Sacramento*, United States District Court, Eastern District of
28 California, Case No. 2:17-cv-00848-JAM-DB, the plaintiff alleged that he was beaten by a police officer

1 and transported to the Sacramento County Main Jail. Jail staff did not offer or provide necessary medical
2 care to the visibility-injured plaintiff, but, rather, placed him in an isolation cell where he was
3 subsequently attacked by multiple jail staff members. The resulting civil rights lawsuit was settled by
4 Defendant COUNTY OF SACRAMENTO.

5 d. In *Rodrique v. County of Sacramento*, United States District Court, Eastern
6 District of California, Case No. 2:17-cv-02698-WBS-EFB, the plaintiff alleged that, after a sheriff's
7 deputy intentionally broken his arm during jail intake, he was placed in a "sobering" cell. The plaintiff
8 requested, and was denied, immediate medical attention. The deputy responsible for breaking his arm
9 opened the cover of the cell's viewing portal, pointed at the plaintiff, and laughed. The plaintiff filed a
10 citizen complaint with Defendant SACRAMENTO COUNTY SHERIFF'S DEPARTMENT against the
11 deputy. Defendant SACRAMENTO COUNTY SHERIFF'S DEPARTMENT "Exonerated" the deputy of
12 the allegations of misconduct [2017PSB-814]. The resulting civil rights lawsuit was settled by Defendant
13 COUNTY OF SACRAMENTO.

14 e. In *Mayfield v. Orozco*, United States District Court, Eastern District of California,
15 Case No. 2:13-cv-02499-JAM-AC, the plaintiff alleged that he was diagnosed with serious mental illness
16 and, as a result, was identified by jail staff as a suicide risk but, despite this knowledge, failed to be
17 provided with necessary mental care in the jail. After being beaten by a jail staff member, the plaintiff
18 attempted to commit suicide in his cell, causing a significant spinal injury that left him paralyzed and
19 cognitively impaired. The resulting civil rights lawsuit was settled by Defendant COUNTY OF
20 SACRAMENTO.

21 f. In The Sacramento Bee article, *Questions Persist Over Jail Health Care* (Dec. 18,
22 2005) (<http://www.parentadvocates.org/nicecontent/dsp_printable.cfm?articleID=6557>), numerous
23 incidents of Defendants COUNTY OF SACRAMENTO and SACRAMENTO COUNTY SHERIFF'S
24 DEPARTMENT and jail staff's failure to provide inmates' necessary treatment and care are documented.

25 32. On information and belief, Defendants COUNTY OF SACRAMENTO, SACRAMENTO
26 COUNTY SHERIFF'S DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50 did not meaningfully
27 discipline, re-train, or otherwise penalize any of the law enforcement officers under their command
28 involved in the incidents described, including the deaths of BRYAN DEBBS, Bryan Debbs, Clifton

1 Harris, Choi Saeteurn, Edward Larson, Tom Korrell, Jonathan Carroll, Brian Guerin, Joshua Gonder, and
2 Mark Scott.

3 33. On information and belief, Defendants COUNTY OF SACRAMENTO, SACRAMENTO
4 COUNTY SHERIFF'S DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50 routinely failed to hold
5 subordinates accountable for violations of law or policies and/or acquiesced in the violations, creating an
6 environment where personnel believe they can "get away with anything."

7 34. On information and belief, Defendants COUNTY OF SACRAMENTO, SACRAMENTO
8 COUNTY SHERIFF'S DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50 were aware of the
9 multiple settlements, prior incidents, and prior complaints.

10 35. On information and belief, despite knowledge of these numerous incidents and systematic
11 problems at Sacramento County Jail facilities, Defendants COUNTY OF SACRAMENTO,
12 SACRAMENTO COUNTY SHERIFF'S DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50
13 perpetuated the problem by knowingly turning a blind eye to the abuses and have ignored or refused to
14 investigate complaints of subordinate misconduct, acquiescing to and implicitly condoning the
15 misconduct through a culture of impunity. These allegations are supported by The Sacramento Bee's
16 recent reporting on misconduct at Sacramento County Jail facilities. (*See, e.g.*,
17 <https://www.sacbee.com/opinion/article238722483.html>) (Memo to Sheriff Jones: Abusive deputies
18 should be fired and charged, not protected.) Additionally, Defendants COUNTY OF SACRAMENTO,
19 SACRAMENTO COUNTY SHERIFF'S DEPARTMENT, and SCOTT R. JONES affirmatively seek to
20 avoid laws requiring disclosure of incidents which could reflect misconduct by their personnel. (*See, e.g.*,
21 <https://www.sacbee.com/news/local/crime/article240513976.html>) (Judge finds Sacramento Sheriff
22 still fails to comply with law on disclosing deputy files).)

23 36. Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S
24 DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50 were or should have been on notice regarding
25 the need to discontinue, modify, or implement new and different versions of the deficient policies or
26 customs because the inadequacies were so obvious and likely to result in the violation of rights of
27 inmates housed at Sacramento County Jail facilities under their command.

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FIRST CLAIM

Failure to Protect

(U.S. Const., Amend. VIII; 42 U.S.C. § 1983)

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4 37. This Claim is asserted by Plaintiff ESTATE OF BRYAN DEBBS (pursuant to Cal. Code
5 Civ. Proc. § 377.30) against Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY
6 SHERIFF’S DEPARTMENT, SCOTT R. JONES, and DOE 1 to 50.

7 38. Plaintiff ESTATE OF BRYAN DEBBS realleges and incorporates the allegations of the
8 preceding paragraphs 1 to 36, to the extent relevant, as if fully set forth in this Claim.

9 39. Defendants DOE 1 to 25, acting or purporting to act in the performance of their official
10 duties as law enforcement officers, intentionally refused to provide BRYAN DEBBS with necessary
11 medical care or treatment, refused to transfer BRYAN DEBBS to a mental health facility that could
12 provide such necessary care or treatment, or intentionally placed BRYAN DEBBS with a dangerous
13 cellmate, putting BRYAN DEBBS at substantial risk of suffering serious harm, and did not take
14 reasonable available measures to abate that risk, where a reasonable official in the circumstances would
15 have appreciated the high degree of risk involved, resulting in the violation of BRYAN DEBBS’s rights
16 protected by the Eighth Amendment to the U.S. Constitution.

17 40. Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF’S
18 DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50, acting under color of state law and as policy-
19 making authorities, knew or should have known that law enforcement officers under their command,
20 including Defendants DOE 1 to 25, were inadequately trained, supervised, or disciplined resulting from
21 either the lack of proper training, pursuant to policy, or the result of the lack of policy, resulting in the
22 violation of BRYAN DEBBS’s rights protected by the Eighth Amendment to the U.S. Constitution.

23 41. Defendants SCOTT R. JONES and DOE 1 to 50’s actions and inactions were motivated
24 by evil motive or intent, involved reckless or callous indifference to constitutional rights, or were
25 wantonly or oppressively done.

26 42. As a direct and proximate result of Defendants COUNTY OF SACRAMENTO,
27 SACRAMENTO COUNTY SHERIFF’S DEPARTMENT, SCOTT R. JONES, and DOE 1 to 50’s
28 actions and inactions, BRYAN DEBBS suffered injuries entitling Plaintiff ESTATE OF BRYAN

1 DEBBS to receive compensatory damages against Defendants COUNTY OF SACRAMENTO,
2 SACRAMENTO COUNTY SHERIFF'S DEPARTMENT, SCOTT R. JONES, and DOE 1 to 50; and
3 punitive damages against Defendants SCOTT R. JONES and DOE 1 to 50.

4 WHEREFORE, Plaintiff ESTATE OF BRYAN DEBBS prays for relief as hereunder appears.

5 **SECOND CLAIM**

6 **Right of Familial Association**

7 **(U.S. Const., Amend. XIV; 42 U.S.C. § 1983)**

8 43. This Claim is asserted by Plaintiff SHELLEY DEBBS against Defendants DOE 1 to 25.

9 44. Plaintiff SHELLEY DEBBS realleges and incorporates the allegations of the preceding
10 paragraphs 1 to 23, to the extent relevant, as if fully set forth in this Claim.

11 45. Defendants DOE 1 to 25, acting or purporting to act in the performance of their official
12 duties as law enforcement officers, intentionally refused to provide BRYAN DEBBS with necessary
13 medical care or treatment, refused to transfer BRYAN DEBBS to a mental health facility that could
14 provide such necessary care or treatment, or intentionally placed BRYAN DEBBS with a dangerous
15 cellmate, putting BRYAN DEBBS at substantial risk of suffering serious harm, and did not take
16 reasonable available measures to abate that risk, where a reasonable official in the circumstances would
17 have appreciated the high degree of risk involved, resulting in the violation of BRYAN DEBBS's rights
18 protected by the Fourteenth Amendment to the U.S. Constitution. Defendants DOE 1 to 25's conduct
19 shocks the conscience, resulting in the violation of Plaintiff SHELLEY DEBBS's rights protected by the
20 Fourteenth Amendment to the U.S. Constitution.

21 46. Defendant DOE 1 to 25's actions and inactions were motivated by evil motive or intent,
22 involved reckless or callous indifference to constitutional rights, or were wantonly or oppressively done.

23 47. As a direct and proximate result of Defendants DOE 1 to 25's actions and inactions,
24 Plaintiff SHELLEY DEBBS suffered injuries entitling her to receive compensatory and punitive
25 damages against Defendants DOE 1 to 25.

26 WHEREFORE, Plaintiff SHELLEY DEBBS prays for relief as hereunder appears.

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THIRD CLAIM

Right of Familial Association

(U.S. Const., Amend. I; 42 U.S.C. § 1983)

48. This Claim is asserted by Plaintiff SHELLEY DEBBS against Defendants DOE 1 to 25.

49. Plaintiff SHELLEY DEBBS realleges and incorporates the allegations of the preceding paragraphs 1 to 23, to the extent relevant, as if fully set forth in this Claim.

50. Defendants DOE 1 to 25, acting or purporting to act in the performance of their official duties as law enforcement officers, intentionally refused to provide BRYAN DEBBS with necessary medical care or treatment, refused to transfer BRYAN DEBBS to a mental health facility that could provide such necessary care or treatment, or intentionally placed BRYAN DEBBS with a dangerous cellmate, putting BRYAN DEBBS at substantial risk of suffering serious harm, and did not take reasonable available measures to abate that risk, where a reasonable official in the circumstances would have appreciated the high degree of risk involved, resulting in the violation of BRYAN DEBBS's rights protected by the Fourteenth Amendment to the U.S. Constitution. Defendants DOE 1 to 25's conduct shocks the conscience, resulting in the violation of Plaintiff SHELLEY DEBBS's rights protected by the First Amendment (as incorporated through the Fourteenth Amendment) to the U.S. Constitution.

51. Defendant DOE 1 to 25's actions and inactions were motivated by evil motive or intent, involved reckless or callous indifference to constitutional rights, or were wantonly or oppressively done.

52. As a direct and proximate result of Defendants DOE 1 to 25's actions and inactions, Plaintiff SHELLEY DEBBS suffered injuries entitling her to receive compensatory and punitive damages against Defendants DOE 1 to 25.

WHEREFORE, Plaintiff SHELLEY DEBBS prays for relief as hereunder appears.

FOURTH CLAIM

Rehabilitation Act

(29 U.S.C. § 701, et seq.)

53. This Claim is asserted by Plaintiff ESTATE OF BRYAN DEBBS (pursuant to Cal. Code Civ. Proc. § 377.30) against Defendants COUNTY OF SACRAMENTO and SACRAMENTO COUNTY SHERIFF'S DEPARTMENT.

1 54. Plaintiff ESTATE OF BRYAN DEBBS realleges and incorporates the allegations of the
2 preceding paragraphs 1 to 36, to the extent relevant, as if fully set forth in this Claim.

3 55. Defendants COUNTY OF SACRAMENTO and SACRAMENTO COUNTY SHERIFF'S
4 DEPARTMENT are each a "public entity" within the meaning of 42 U.S.C. § 12131(1)(A) and 28 C.F.R.
5 § 35.104. Upon information and belief, Defendants COUNTY OF SACRAMENTO and
6 SACRAMENTO COUNTY SHERIFF'S DEPARTMENT receive federal financial assistance. BRYAN
7 DEBBS, at all times material herein, was regarded as having a physical or mental impairment that
8 substantially limited one or more major life activities; or perceived to have a physical or mental
9 impairment.

10 56. Defendants DOE 1 to 25, acting or purporting to act in the performance of their official
11 duties as law enforcement officers, intentionally refused to provide BRYAN DEBBS with necessary
12 medical care or treatment, refused to transfer BRYAN DEBBS to a mental health facility that could
13 provide such necessary care or treatment, or intentionally placed BRYAN DEBBS with a dangerous
14 cellmate, putting BRYAN DEBBS at substantial risk of suffering serious harm, and did not take
15 reasonable available measures to abate that risk, where a reasonable official in the circumstances would
16 have appreciated the high degree of risk involved, resulting in the violation of BRYAN DEBBS's rights
17 protected by the Rehabilitation Act, 29 U.S.C. § 701, *et seq.*

18 57. Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S
19 DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50, acting under color of state law and as policy-
20 making authorities, knew or should have known that law enforcement officers under their command,
21 including Defendants DOE 1 to 25, were inadequately trained, supervised, or disciplined resulting from
22 either the lack of proper training, pursuant to policy, or the result of the lack of policy, resulting in the
23 violation of BRYAN DEBBS's rights protected by the Rehabilitation Act, 29 U.S.C. § 701, *et seq.*

24 58. Defendants SCOTT R. JONES and DOE 1 to 50's actions and inactions were motivated
25 by evil motive or intent, involved reckless or callous indifference to statutory rights, or were wantonly or
26 oppressively done.

27 59. As a direct and proximate result of Defendants COUNTY OF SACRAMENTO,
28 SACRAMENTO COUNTY SHERIFF'S DEPARTMENT, SCOTT R. JONES, and DOE 1 to 50's

1 actions and inactions, BRYAN DEBBS suffered injuries entitling Plaintiff ESTATE OF BRYAN
2 DEBBS to receive nominal, compensatory, and punitive damages against Defendants COUNTY OF
3 SACRAMENTO and SACRAMENTO COUNTY SHERIFF'S DEPARTMENT.

4 WHEREFORE, Plaintiff ESTATE OF BRYAN DEBBS prays for relief as hereunder appears.

5 **FIFTH CLAIM**

6 **Americans with Disabilities Act**

7 **(42 U.S.C. § 12101, *et seq.*)**

8 60. This Claim is asserted by Plaintiff ESTATE OF BRYAN DEBBS (pursuant to Cal. Code
9 Civ. Proc. § 377.30) against Defendants COUNTY OF SACRAMENTO and SACRAMENTO
10 COUNTY SHERIFF'S DEPARTMENT.

11 61. Plaintiff ESTATE OF BRYAN DEBBS realleges and incorporates the allegations of the
12 preceding paragraphs 1 to 36, to the extent relevant, as if fully set forth in this Claim.

13 62. Defendants COUNTY OF SACRAMENTO and SACRAMENTO COUNTY SHERIFF'S
14 DEPARTMENT are each a "public entity" within the meaning of 42 U.S.C. § 12102(1) and 28 C.F.R. §
15 35.104. BRYAN DEBBS, at all times material herein, was regarded as having a physical or mental
16 impairment that substantially limited one or more major life activities; or perceived to have a physical or
17 mental impairment.

18 63. Defendants DOE 1 to 25, acting or purporting to act in the performance of their official
19 duties as law enforcement officers, intentionally refused to provide BRYAN DEBBS with necessary
20 medical care or treatment, refused to transfer BRYAN DEBBS to a mental health facility that could
21 provide such necessary care or treatment, or intentionally placed BRYAN DEBBS with a dangerous
22 cellmate, putting BRYAN DEBBS at substantial risk of suffering serious harm, and did not take
23 reasonable available measures to abate that risk, where a reasonable official in the circumstances would
24 have appreciated the high degree of risk involved, resulting in the violation of BRYAN DEBBS's rights
25 protected by the Americans with Disabilities Act, 42 U.S.C. § 12101, *et seq.*

26 64. Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S
27 DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50, acting under color of state law and as policy-
28 making authorities, knew or should have known that law enforcement officers under their command,

1 including Defendants DOE 1 to 25, were inadequately trained, supervised, or disciplined resulting from
2 either the lack of proper training, pursuant to policy, or the result of the lack of policy, resulting in the
3 violation of BRYAN DEBBS's rights protected by the Americans with Disabilities Act, 42 U.S.C. §
4 12101, *et seq.*

5 65. Defendants SCOTT R. JONES and DOE 1 to 50's actions and inactions were motivated
6 by evil motive or intent, involved reckless or callous indifference to statutory rights, or were wantonly or
7 oppressively done.

8 66. As a direct and proximate result of Defendants COUNTY OF SACRAMENTO,
9 SACRAMENTO COUNTY SHERIFF'S DEPARTMENT, SCOTT R. JONES, and DOE 1 to 50's
10 actions and inactions, BRYAN DEBBS suffered injuries entitling Plaintiff ESTATE OF BRYAN
11 DEBBS to receive nominal, compensatory, and punitive damages against Defendants COUNTY OF
12 SACRAMENTO and SACRAMENTO COUNTY SHERIFF'S DEPARTMENT.

13 WHEREFORE, Plaintiff ESTATE OF BRYAN DEBBS prays for relief as hereunder appears.

14 **SIXTH CLAIM**

15 **Right to Medical Care / Treatment**

16 **(Cal. Gov. Code § 845.6)**

17 67. This Claim is asserted by Plaintiff ESTATE OF BRYAN DEBBS (pursuant to Cal. Code
18 Civ. Proc. § 377.30) against Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY
19 SHERIFF'S DEPARTMENT, SCOTT R. JONES, and DOE 1 to 50.

20 68. Plaintiff ESTATE OF BRYAN DEBBS realleges and incorporates the allegations of the
21 preceding paragraphs 1 to 36, to the extent relevant, as if fully set forth in this Claim.

22 69. Defendants DOE 1 to 25, acting or purporting to act in the performance of their official
23 duties as law enforcement officers, knew or had reason to know that BRYAN DEBBS was in need of
24 immediate medical care and failed to take reasonable action to summon such medical care.

25 70. Defendants COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S
26 DEPARTMENT, SCOTT R. JONES, and DOE 26 to 50, acting under color of state law and as policy-
27 making authorities, maintained policies or customs of action and inaction resulting in the violation of
28 BRYAN DEBBS's rights protected by Cal. Gov. Code § 845.6.

1 deprive BRYAN DEBBS of his statutory and constitutional rights protected by the Fourteenth
2 Amendment to the U.S. Constitution; art. I, § 17 of the California Constitution; the Rehabilitation Act, 29
3 U.S.C. § 701, *et seq.*; and the Americans with Disabilities Act, 42 U.S.C. § 12101, *et seq.*; and/or

4 b. knew or had reason to know that BRYAN DEBBS was in need of immediate
5 medical care and failed to take reasonable action to summon such medical care, with specific intent (*i.e.*,
6 deliberate indifference or reckless disregard) to deprive BRYAN DEBBS of his statutory rights protected
7 by Cal. Gov. Code § 845.6.

8 77. Defendants SCOTT R. JONES and DOE 26 to 50, acting under color of state law and as
9 policy-making authorities knew or should have known that law enforcement officers under their
10 command, including Defendants DOE 1 to 25, were inadequately trained, supervised, or disciplined
11 resulting from either the lack of proper training, pursuant to policy, or the result of the lack of policy,
12 with specific intent (*i.e.*, deliberate indifference or reckless disregard) to deprive BRYAN DEBBS of his
13 statutory and constitutional rights protected by the Fourteenth Amendment to the U.S. Constitution; art. I,
14 § 17 of the California Constitution; the Rehabilitation Act, 29 U.S.C. § 701, *et seq.*; the Americans with
15 Disabilities Act, 42 U.S.C. § 12101, *et seq.*; and Cal. Gov. Code § 845.6.

16 78. Defendants SCOTT R. JONES and DOE 1 to 50's actions and inactions constituted
17 oppression, fraud, and/or malice resulting in great harm to BRYAN DEBBS.

18 79. As a direct and proximate result of Defendants SCOTT R. JONES and DOE 1 to 50's
19 actions and inactions, BRYAN DEBBS suffered injuries entitling Plaintiff ESTATE OF BRYAN
20 DEBBS to receive compensatory damages, treble damages, punitive damages, and civil penalties against
21 Defendants SCOTT R. JONES and DOE 1 to 50.

22 WHEREFORE, Plaintiff ESTATE OF BRYAN DEBBS prays for relief as hereunder appears.

23 **EIGHTH CLAIM**

24 **Negligence**

25 80. This Claim is asserted by Plaintiff ESTATE OF BRYAN DEBBS (pursuant to Cal. Code
26 Civ. Proc. § 377.30) against Defendants SCOTT R. JONES and DOE 1 to 50.

27 81. Plaintiff ESTATE OF BRYAN DEBBS realleges and incorporates the allegations of the
28 preceding paragraphs 1 to 36, to the extent relevant, as if fully set forth in this Claim.

1 82. Defendants DOE 1 to 25, acting or purporting to act in the performance of their official
2 duties as law enforcement officers, owed BRYAN DEBBS a duty of care and breached that duty,
3 including by:

- 4 a. failing to protect BRYAN DEBBS, despite the existence of a special relationship;
- 5 b. failing to provide BRYAN DEBBS with necessary medical care or treatment;
- 6 c. failing to transfer BRYAN DEBBS to a mental health facility that could provide
7 such necessary care or treatment;
- 8 d. placing BRYAN DEBBS with a dangerous cellmate;
- 9 e. putting BRYAN DEBBS at substantial risk of suffering serious harm and failing to
10 take reasonable available measures to abate that risk; and/or
- 11 f. knowing or having reason to know that BRYAN DEBBS was in need of
12 immediate medical care and failing to take reasonable action to summon such medical care, pursuant to
13 Cal. Gov. Code § 845.6.

14 83. Defendants SCOTT R. JONES and DOE 26 to 50, acting under color of state law and as
15 policy-making authorities, owed BRYAN DEBBS a duty of care and breached that duty, including by:

- 16 a. failing to protect BRYAN DEBBS, despite the existence of a special relationship;
17 and/or
- 18 b. inadequately training, supervising, or disciplining law enforcement officers under
19 their command, including Defendants DOE 1 to 25, resulting from either the lack of proper training,
20 pursuant to policy, or the result of the lack of policy.

21 84. Defendants SCOTT R. JONES and DOE 1 to 50's actions and inactions constituted
22 oppression, fraud, and/or malice resulting in great harm to BRYAN DEBBS.

23 85. As a direct and proximate result of Defendants SCOTT R. JONES and DOE 1 to 50's
24 actions and inactions, BRYAN DEBBS suffered injuries entitling Plaintiff ESTATE OF BRYAN
25 DEBBS to receive compensatory and punitive damages against SCOTT R. JONES and DOE 1 to 50.

26 WHEREFORE, Plaintiff ESTATE OF BRYAN DEBBS prays for relief as hereunder appears.

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NINTH CLAIM

Wrongful Death

(Cal. Code Civ. Proc. § 377.60)

86. This Claim is asserted by Plaintiff SHELLEY DEBBS against Defendants SCOTT R. JONES and DOE 1 to 50; and against Nominal Defendant RIGOBERTO ARRIAGA

87. Plaintiff SHELLEY DEBBS realleges and incorporates the allegations of the preceding paragraphs 1 to 36, to the extent relevant, as if fully set forth in this Claim.

88. Defendants DOE 1 to 25, acting or purporting to act in the performance of their official duties as law enforcement officers, engaged in the following wrongful act or neglect which caused BRYAN DEBBS's death:

- a. failing to protect BRYAN DEBBS, despite the existence of a special relationship;
- b. failing to provide BRYAN DEBBS with necessary medical care or treatment;
- c. failing to transfer BRYAN DEBBS to a mental health facility that could provide such necessary care or treatment;
- d. placing BRYAN DEBBS with a dangerous cellmate;
- e. putting BRYAN DEBBS at substantial risk of suffering serious harm and failing to take reasonable available measures to abate that risk; and/or
- f. knowing or having reason to know that BRYAN DEBBS was in need of immediate medical care and failing to take reasonable action to summon such medical care, pursuant to Cal. Gov. Code § 845.6.

89. Defendants SCOTT R. JONES and DOE 26 to 50, acting under color of state law and as policy-making authorities, engaged in the following wrongful act or neglect which caused BRYAN DEBBS's death:

- a. failing to protect BRYAN DEBBS, despite the existence of a special relationship; and/or
- b. inadequately training, supervising, or disciplining law enforcement officers under their command, including Defendants DOE 1 to 25, resulting from either the lack of proper training, pursuant to policy, or the result of the lack of policy.

1 90. Defendants SCOTT R. JONES and DOE 1 to 50's actions and inactions constituted
2 oppression, fraud, and/or malice resulting in great harm to Plaintiff SHELLEY DEBBS.

3 91. As a direct and proximate result of Defendants SCOTT R. JONES and DOE 1 to 50's
4 actions and inactions, Plaintiff SHELLEY DEBBS suffered injuries entitling her to receive compensatory
5 and punitive damages against Defendants SCOTT R. JONES and DOE 1 to 50.

6 WHEREFORE, Plaintiff SHELLEY DEBBS prays for relief as hereunder appears.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, Plaintiffs ESTATE OF BRYAN DEBBS and SHELLEY DEBBS seek Judgment
9 as follows:

10 1. For an award of nominal, compensatory, general, and special damages against Defendants
11 COUNTY OF SACRAMENTO, SACRAMENTO COUNTY SHERIFF'S DEPARTMENT, SCOTT R.
12 JONES, and DOE 1 to 50, according to proof at trial;

13 2. For an award of exemplary/punitive damages against SCOTT R. JONES and DOE 1 to
14 50, in an amount sufficient to deter and to make an example of them, because their actions and/or
15 inactions, as alleged, were motivated by evil motive or intent, involved reckless or callous indifference to
16 constitutionally-protected rights, or were wantonly or oppressively done, and/or constituted oppression
17 and/or malice resulting in great harm;

18 3. For an award of actual damages, treble damages, punitive damages, civil penalties, and
19 any other available relief against Defendants SCOTT R. JONES and DOE 1 to 50, pursuant to Cal. Civ.
20 Code §§ 52, 52.1, and any other statute as may be applicable;

21 4. For an award of reasonable attorneys' fees and costs, pursuant to 42 U.S.C. § 1988, 29
22 U.S.C. § 794, 42 U.S.C. § 12205, Cal. Civ. Code § 52.1, Cal. Code Civ. Proc. § 1021.5, and any other
23 statute as may be applicable; and

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5. For an award of any other further relief, as the Court deems fair, just, and equitable.

Dated: June 9, 2020

Respectfully Submitted,



By: _____

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ESTATE OF BRYAN DEBBS
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JURY TRIAL DEMAND

A JURY TRIAL IS DEMANDED on behalf of Plaintiffs ESTATE OF BRYAN DEBBS and SHELLEY DEBBS.

Dated: June 9, 2020

Respectfully Submitted,



By: _____

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