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7 Attorney for Plaintiffs,
8 And as successors in interest to the
9 ESTATE OF DECEDENT – BINH VAN NGUYEN

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF ORANGE, CENTRAL JUSTICE CENTER**
13 **UNLIMITED JURISDICTION**

30-2017-00931894-CU-CR-CJC

14 MICHELLE SUZANNE HADLEY
15 An Individual ,

16 Plaintiffs

17 vs.

18 CITY OF ANAHEIM, Pewsey as an
19 individual and in his official capacity ,
20 Segletes as an individual and in his official
21 capacity, Lee as an individual and in his
22 official capacity and Cunha as an individual
23 and in his official; ANGELA MARIE DIAZ
24 an individual , IAN RICHARD DIAZ an
25 individual and DOES 1 to 100, inclusive,

26 Defendants.

Case No.: Judge Gregory H. Lewis

COMPLAINT FOR:

1. False Imprisonment;

Unlimited Civil Case
Demand over \$25,000.

1 MICHELLE SUZANNE HADLEY

2 An Individual ,

3 CITY OF ANAHEIM, Pewsey as an individual and in his official capacity , Segletes as
4 an individual and in his official capacity, Lee as an individual and in his official capacity and
5 Cunha as an individual and in his official; ANGELA MARIE DIAZ an individual , IAN
6 RICHARD DIAZ an individual and DOES 1 to 100, inclusive allege as follows:

7 **INTRODUCTION**

8 This is an action for money damages brought pursuant to 42 U.S.C. § 1983, the Fourth
9 and Fourteenth Amendments to the United States Constitution and the constitutional right to
10 substantive due process and under the law of the State of California, against Doe police officers
11 of the City of Anaheim, in their individual capacities and official capacity, PEWSEY as an
12 individual and in his official capacity , SEGLETES as an individual and in his official capacity,
13 LEE as an individual and in his official capacity and CUNHA as an individual and in his official;
14 ANGELA MARIE DIAZ an individual , IAN RICHARD DIAZ an individual and DOES 1 to
15 100, inclusive allege as follows.

16 **VENUE**

17 Venue is proper in the Central District of Orange County in that Plaintiffs are informed
18 and believe and therefore allege that all Defendants reside in the Central District, within the State
19 of California. Venue is also proper, because virtually all of the events, acts, or omissions giving
20 rise to the claims occurred in the Central District.

21 **PARTIES**

22 1. MICHELLE SUZANNE HADLEY (hereinafter "PLAINTIFF"), was a resident of
23 County of Orange at all relevant times herein.

24 2. Plaintiff is informed and believes and therefore alleges that Defendant, PEWSEY is
25 an individual residing in Orange County, California and a police officer at City of Anaheim,
26 Anaheim Police Department.

27 3. Plaintiff is informed and believes and therefore alleges that Defendant, SEGLETESS
28 is an individual residing in Orange County, California and a police officer at City of Anaheim,
Anaheim Police Department

1 4. Plaintiff is informed and believes and therefore alleges that Defendant, LEE is an
2 individual residing in Orange County, California and a police officer at City of Anaheim,
3 Anaheim Police Department.

4 5. Plaintiff is informed and believes and therefore alleges that Defendant, CUNHA is an
5 individual residing in Orange County, California and a police officer at City of Anaheim,
6 Anaheim Police Department.

7 6. Plaintiff is informed and believes and therefore alleges that Defendant, IAN
8 RICHARD DIAZ is an individual residing in Orange County, California.

9 7. 6. Plaintiff is informed and believes and therefore alleges that Defendant, ANGELA
10 MARIE DIAZ is an individual residing in Orange County, California

11 7. Plaintiffs are informed and believe and therefore allege that Defendants, DOE 2 to
12 DOE 10, are and at all relevant times were individuals and a citizen of the State of California
13 residing in Orange County, California and police officers at City of Santa Ana, Anaheim Police
14 Department.

15 8. Plaintiffs are informed and believe and therefore allege that Defendant, City of
16 ANAHEIM, is and at all relevant times was a government municipality within the jurisdiction of
17 the United States, located in Orange County, California.

18 12. On information and belief, the true names and capacities of the Defendants named
19 herein as Does 11 to 100, inclusive, whether individual, partnership, corporate, associate or
20 otherwise, are unknown to Plaintiffs who therefore sue such Defendants by fictitious names.
21 Plaintiffs will amend this complaint to show such true names and capacities when they have been
22 determined. The DOE Defendants and the named Defendants are collectively referred to in this
23 Complaint as the "Defendants," unless otherwise stated or the context requires otherwise.

24 14. Plaintiffs are informed and believe and on that basis allege that at all times herein
25 mentioned, each Defendant was the employee, agent, and servant of each of the other Defendants
26 and in doing the things herein alleged, was acting within the course and scope of its authority as
27 such, and with the consent of each of the other Defendants. Each of the individual Defendants
28 are sued in both their individual capacities, as well as their official capacities as either Mayor of

1 the City of Anaheim or law enforcement personnel for the City of Anaheim including but not
2 limited to Police Chief, , and each of the individual police officer Defendants as DOE
3 Defendants later to be named upon ascertainment of their true names. The true names of Doe
4 defendants will be pursued in discovery.

5 GENERAL FACTUAL ALLEGATIONS

6
7 15. On June 01, 2016 at 2100 hours, Angela Diaz and Ian Diaz went to
8 Anaheim police department and falsely reported threatening messages from
9 Plaintiff. Angela Diaz and Ian Diaz falsely reported that from May 26, 2016
10 to June 01, 2016, Angela Diaz received numerous e-mails from Plaintiff.
11 Angela Diaz believes Plaintiff obtained her email through her LinkedIn
12 profile. Angela Diaz received some e-mails from Plaintiff direct e-mail
13 address and the rest where from unknown e-mail addresses. Plaintiff initial
14 e-mails only advised and warned Angela Diaz about her marriage with Ian
15 Diaz. Angela Diaz told Plaintiff to stop contacting her, but Plaintiff
16 continued to send her e-mails. The e-mails then, escalated by threatening to
17 kill, kidnap, rape, and torture Angela Diaz. Plaintiff stated several times
18 "watch your back tonight and this week "and "I hope you are scared of
19 death tomorrow." Angela Diaz also received graphic photographs of women
20 being kidnapped and raped. See attached scanned images for the
21 photographs and emails.

22 16. from June 24, 2017 to July 13, 2017, Angela Diaz and Ian Diaz made
23 numerous false reports to the Anaheim Police department that Angela Diaz was
24 sexually assaulted, raped or was the victim of attempted rape because of ads that
25 plaintiff posted on craigslist.

26 17. Due to the False reports of Ian Diaz and Angela Diaz Plaintiff was falsely
27 arrested and imprisoned on June 14, 2017 and bail was set at one million dollars.
28 Plaintiff was unable to post bail and spent 88 days in Orange County Jail.

18. Although Plaintiff was released on her own recognizance, Plaintiff was still
charged for crimes which carried sentences of 7 years to life in prison.

19. On January 19, 2017, The Orange County District Attorney Exonerated
Plaintiff of all wrong doing against Angela Diaz . The District attorney stated that
Angela Diaz had concocted all of her statements against Plaintiff and Diaz herself
staged the attacks and was responsible for the false craigslist ad activity

20. Angela Diaz was arrested and charged with multiple crimes against Plaintiff

FIRST CAUSE OF ACTION

