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FILED
Clerk of the Superior Court
FEB 10 2020
By _____
DEPUTY CLERK

**ASSIGNED TO
JUDGE Wendy G. Getty
FOR ALL PURPOSES**

***425CMFF383073**

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SOLANO

UNLIMITED JURISDICTION

14 JAZMA WASHINGTON, an individual; S.W.,
15 S.S.W, J.S., S.J. and V.H. are minors, by and
16 through their guardian ad litem, DON
TAYLOR,

17 Plaintiffs,

18 vs.

19 SIX FLAGS ENTERTAINMENT, a
20 corporation; and DOES 1-50, inclusive.

21 Defendants.

Case No.: **FCS054347**

COMPLAINT FOR DAMAGES

BATTERY

NEGLIGENCE

NEGLIGENT SUPERVISION

FALSE IMPRISONMENT

NEGLIGENT INFLICTION OF

EMOTIONAL DISTRESS

JURY TRIAL DEMANDED

22 **INTRODUCTION**

23
24
25 1. On May 28, 2018, Plaintiff Jazma Washington took her children, her family and
26 her boyfriend to enjoy a day at Six Flags amusement park in Vallejo, California. Ms. Washington
27 had purchased season tickets for her kids and herself. After enjoying some of the rides, Ms.
28

1 Washington and her children purchased food that was included with their season tickets, and
2 there was a small dispute whether toppings on ice creams were included. After a discussion with
3 a manager, Ms. Washington agreed to pay the extra fee for toppings. Later, Ms. Washington and
4 her family left the park and were on their way to their car in the parking lot.
5

6 2. On their way to their cars, several yet-to-be-identified Six Flags employees
7 followed them out and cornered them accusing them of not paying. Ms. Washington explained
8 that attempted to walk away from them to go home with her children, and an employee attacked
9 her. The employee grabbed her by the neck and threw her to ground breaking her wrist. Ms.
10 Washington's teenage daughter attempted to intervene and the Six Flags supervisor punched her
11 daughter in the face.
12

13 3. As a result, Ms. Washington and her daughter, Plaintiff S.W., were beat up by
14 yet-to-be-identified male Six Flags employees causing serious harm and a broken wrist.
15 Furthermore, the Doe employees beat up and choked Ms. Washington in front of her five
16 children causing each of them serious emotional distress and suffering.
17

18 JURISDICTION

19 4. The unlawful acts and practices alleged herein occurred in Vallejo, Solano
20 County, California, which is within this judicial district.
21

22 PARTIES

23 5. Plaintiff JAZMA WASHINGTON (hereinafter "Plaintiff") is a competent adult,
24 resident of CALIFORNIA.

25 6. S.W., S.S.W, J.S., S.J. and V.H. are minors, by and through their guardian ad
26 litem, DON TAYLOR. Plaintiff minors are the biological children of JAZMA WASHINGTON.
27

1
2 20. Plaintiff hereby re-alleges an incorporates each and every paragraph in this
3 Complaint as if fully set forth here.

4 21. At all times, Defendant DOES and Defendant SIX FLAGS owed Plaintiffs the
5 duty to act with reasonable care including allowing them to leave the premises without battering
6 them. Instead, Defendant DOES 1-50 attacked Plaintiffs who were lawfully leaving.
7

8 22. Defendants, through their acts and omissions, breached each and every one of the
9 aforementioned duties owed to Plaintiffs.

10 23. Defendants DOES 1-50 and SIX FLAGS are vicariously liable for the wrongful
11 acts and omissions of its employees and agents.
12

13 24. As a direct and proximate result of Defendants' negligence, Plaintiff sustained
14 injuries and damages, and against each and every Defendant is entitled to relief as set forth
15 above.
16

17 **THIRD CAUSE OF ACTION**
18 **(Negligent Hiring, Supervision and/or Retaining)**
19 *(Plaintiffs Washington and S.W. against SIX FLAGS and DOES 1-50)*

20 25. Plaintiff hereby re-alleges and incorporates each and every paragraph in this
21 Complaint as if fully set forth here.

22 26. At all times, Defendants owed Plaintiffs the duty to act with reasonable care in
23 regards to hiring, supervision and retention of employees. Defendant DOES and SIX FLAGS
24 were aware that employees were using physical force against customers simply for alleged
25 failure to pay without calling for law enforcement. Furthermore, the supervisors' participation in
26 the use of force is indicative of the failure to properly supervise its employees. Therefore,
27 Defendant DOES and SIX FLAGS had retained and reinforced the conduct of these employees.
28

1 33. Plaintiffs re-allege and incorporate by reference each and every paragraph of this
2 Complaint.

3 34. Defendants forcefully held Plaintiffs from leaving without just cause under false
4 pretenses. Defendants confined Plaintiffs without their consent or a lawful basis.
5

6 35. As a result of the Defendants' unlawful confinement, Plaintiffs suffered emotional
7 distress and physical injuries.

8 WHEREFORE, Plaintiffs pray for relief as hereinafter set forth.

9 **JURY DEMAND**

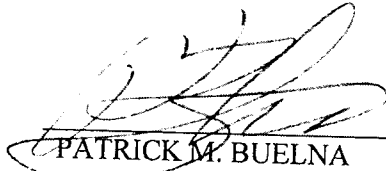
10 36. Plaintiffs hereby demand a jury trial in this action.

11 **PRAYER**

12 Wherefore, Plaintiffs pray for relief as follows:

- 13
- 14 1. For general damages in a sum to be proven at trial;
 - 15 2. For special damages, included but not limited to medical expenses and other
16 special damages in a sum to be determined according to proof;
 - 17 3. For punitive damages against Defendant DOES 1-50 in a sum according to
18 proof;
 - 19 4. For cost of suit herein incurred; and
 - 20 5. For such other and future relief as the Court deems just a proper.
- 21
22

23 Dated: February 7, 2020

24
25
26 
27 PATRICK M. BUELNA
LAW OFFICES OF JOHN BURRIS

28 Attorney for Plaintiffs