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Superior Court of California,  
County of Los Angeles  
11/01/2023 1:10 PM  
David W. Slayton,  
Executive Officer/Clerk of Court,  
By Y. Ayala, Deputy Clerk

7 SUPERIOR COURT OF CALIFORNIA  
8 LOS ANGELES COUNTY

9 JASON REEDY, an individual, ) Case No. 23STCV26754  
10 PLAINTIFF, ) CAUSES OF ACTIONS  
11 v. ) 1. NEGLIGENCE -- Premises  
12 KEVIN DE LEON, ) Liability  
13 Los Angeles City Councilman, ) 2. BATTERY  
14 CITY OF LOS ANGELES and DOES 1-10, )  
15 DEFENDANTS. )  
16 \_\_\_\_\_ )

17 I. FACTS

18 Defendant, City of Los Angeles, owns and controls the real property at 3501 Valley Blvd., Los  
19 Angeles, CA, 90031 (the facility).

20 Defendant, City of Los Angeles, invited Plaintiff to an event on 12/9/22 at 6 PM occurring at the  
21 facility (the event).

22 Defendant, City of Los Angeles, invited the public to the event.

23 Defendant, City of Los Angeles, invited Kevin De Leon, the notorious member of the Los  
24 Angeles City Council and Defendant, to the event.

25 Defendant, City of Los Angeles, has previously provided security at events at this facility.

26 Prior to the event, public appearances by DeLeon at other facilities controlled by plaintiff drew  
27 crowds and protestors that were incited by DeLeon's racist rhetoric.  
28

1  
2 Plaintiff had a duty to provide security at the event that would protect the public from DeLeon's  
3 violent bad behavior.

4 Defendant, City of Los Angeles, did not provide security at the event to prevent DeLeon from  
5 lashing out and attacking the invited guest, including Plaintiff.

6  
7 Plaintiff was physically attacked by DeLeon at the event.

8  
9 Plaintiff suffered damages as a result of DeLeon's attack at the event.

10 The defendant provided security, including LAPD officers, at those prior appearances, including  
11 at city council meetings.

12  
13 Defendant filed a claim that was rejected Plaintiff claim.

14  
15 **II. FIRST CAUSE OF ACTION – PREMISES LIABILITY**

16  
17 Plaintiff incorporates all of the above.

18 Defendant had a duty to provide security to ensure the safety of those attending public events at  
19 the facility.

20  
21 Defendant knew and could fore seen that protestors would attend the event based on DeLeon's  
22 appearance at the event.

23 Defendant failed to provide adequate security to prevent DeLeon from physically attacking  
24 plaintiff.

25  
26 Plaintiff was harmed by Defendants lack of preparation, security and by DeLeon's physical  
27 attack.

28 COMPLAINT

1            III. SECOND CAUSE OF ACTION – BATTERY

2  
3            Plaintiff incorporates all of the above.

4            Kevin DeLeon, defendant's agent, grabbed, pushed and hit plaintiff at the event.

5  
6            DeLeon did not have plaintiff's consent to grab, push or hit him.

7  
8            Plaintiff was harmed by DeLeon's grabbing, pushing and hitting him.

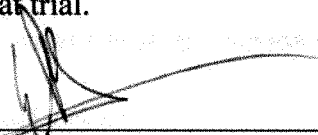
9  
10           DeLeon's actions were the cause of the harm plaintiff suffered.

11           Defendant grabbed, hit and pushed plaintiff without consent.

12  
13           IV. PRAYER

14           For damages, including punitive damages, to be proven at trial.

15  
16           Dated: 10/31/23

17           By:   
                 Dermot Givens  
                 Attorney for Jason Reedy, Plaintiff