

1 John C. Carpenter (155610)
carpenter@cz.law
2 Carlos A. Hernandez, Esq. (SBN 316905)
chernandez@cz.law
3 Gabriel Minsal, Esq., LLM (SBN 347600)
gminsal@czrlaw.com
4 **CARPENTER & ZUCKERMAN**
5 8827 West Olympic Boulevard
6 Beverly Hills, California 90211
7 Tel: (310) 273-1230
8 Fax: (310) 858-1063

8 *Attorneys for Plaintiffs*
9 ESTATE OF STANLEY WILSON, JR.,
10 D. PULANE LUCAS, & STANLEY WILSON, SR.

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **FOR THE COUNTY OF LOS ANGELES**

13 ESTATE OF STANLEY WILSON, JR., by and
14 through Administrator D. Pulane Lucas and Stanley
15 Wilson, Sr.; D. PULANE LUCAS, an individual;
and STANLEY TOBIAS WILSON, SR.

16 Plaintiffs,

17 vs.

18 LOS ANGELES COUNTY SHERIFF'S
19 DEPARTMENT, a public entity; COUNTY OF
20 LOS ANGELES, a municipal government entity;
21 CALIFORNIA DEPARTMENT OF STATE
HOSPITALS, a state governmental agency; and
DOES 1 through 50, Inclusive;

22 Defendants.

FILED
Superior Court of California
County of Los Angeles
10/15/2025
David W. Slayton, Executive Officer / Clerk of Court
By: L. Naphen Deputy

CASE NO.: 23STCV21997
**FOURTH AMENDED COMPLAINT
FOR WRONGFUL DEATH AND
SURVIVAL DAMAGES FOR:**
1. **BANE CIVIL RIGHTS ACT
VIOLATIONS (CIV. CODE § 52.1)**
2. **NEGLIGENCE**
3. **NEGLIGENT HIRING,
SUPERVISION, AND
RETENTION**
4. **VIOLATIONS OF PENAL CODE
§ 10008 FAILURE TO REPORT
IN-CUSTODY DEATHS OF
INMATES (CAL. P.C. § 10008)**

**** DEMAND FOR JURY TRIAL ****

1 The Los Angeles County jail system has been experiencing recent increases in in-custody
2 deaths, with 2022 reporting twice as many in-custody deaths as 2016. Mistreatment and neglect of
3 inmates experiencing mental health illness, like Stanley Wilson, Jr., have been widely reported at
4 Los Angeles Sheriff Department's Twin Towers Correctional Facility with conditions falling far
5 below minimum health and safety standards. Facility reviews have found widespread failures by
6 County of Los Angeles custodial staff and medical examiners to exercise due diligence in ensuring
7 for the health and well-being of inmates, including of pre-trial detainee, like Stanley Wilson, Jr.
8 According to ACLU documentation, in 0% of in-custody death cases have field investigators and
9 medical examiners reviewed all pertinent inmate medical records, including relevant emergency
10 and mental health records. In order to shed light on the problem of in-custody deaths, the
11 California State Legislature enacted Assembly Bill 2761 and amended California Penal Code
12 Section 10008 to impose upon the County of Los Angeles the legal duty to report the facts and
13 circumstances of all in-custody deaths. On February 1, 2023, Stanford University Graduate and
14 former Detroit Lions cornerback Stanley Wilson Jr. died at the age of 40 while being held by the
15 County of Los Angeles. For reasons currently unknown to Plaintiffs, Defendants in this case,
16 including the County of Los Angeles refused to report, timely and otherwise, the facts and
17 circumstances of Stanley Wilson Jr.'s in-custody death. Defendants illegally failed and refused to
18 report the fact of Stanley Wilson Jr.'s in-custody death as required by law. With this action,
19 Plaintiffs seek the truth of the circumstances of their son's untimely death while in-custody so that
20 justice may be served.

21 COMES NOW, Plaintiffs ESTATE OF STANLEY WILSON, JR., by and through
22 administrator D. Pulane Lucas, D. PULANE LUCAS, an individual, and STANLEY TOBIAS
23 WILSON, SR., an individual, (collectively, "Plaintiffs") who complain and allege against
24 Defendants LOS ANGELES SHERIFF'S DEPARTMENT, a county law enforcement public entity,
25 COUNTY OF LOS ANGELES, a government entity, and the following Defendant COUNTY OF
26 LOS ANGELES' public employees: Defendants MICHAEL SMITH, M.D., an individual,
27 PATTY R. MONTOYA, N.P., an individual, JACOB PORTER KUNES, D.O., an individual;
28 QUYEN LU, PHARM. D., A.P., an individual, LAKEISHA MCBROOM, an individual,

1 THAJUDEEN OLADEPO, an individual, THOMAS D. HAN, D.D.S, an individual, DIRECTOR
2 TIMOTHY BELAVICH, PH.D., an individual, ASSISTANT SHERIFF PAULA L. TOKAR, an
3 individual, CHIEF TANIA PLUNKETT, an individual, and DOES 18 through 50, inclusive,
4 (collectively, “Defendants”) the following:

5 **THE PARTIES**

6 1. Stanley Wilson, Jr.’s death was pronounced on February 1, 2023, at or around 10:27
7 a.m. At all relevant times herein, Stanley Wilson Jr. was a resident of the State of California.
8 Stanley Wilson, Jr. was the son of Plaintiffs D. PULANE LUCAS and STANLEY TOBIAS
9 WILSON, SR. Due to the facts and circumstances of Stanley Wilson, Jr.’s February 1, 2023 death
10 as alleged herein, Plaintiff ESTATE OF STANLEY WILSON, JR., by and through administrators
11 D. PULANE LUCAS and STANLEY TOBIAS WILSON, SR. (“THE ESTATE”), brings this
12 action to recover survival action damages as a result of the tortious, unconstitutional, and illegal
13 acts and omissions that caused Stanley Wilson, Jr.’s death while he was in the COUNTY’s custody.

14 2. Plaintiff D. PULANE LUCAS was and remains a resident of the State of Virginia
15 and is Stanley Wilson’s mother. Plaintiff D. PULANE LUCAS is entitled to the property of
16 Stanley Wilson, Jr. under the laws of intestate and testate succession. Pursuant to, without
17 limitation, the operation of Cal. *Civ. Proc. Code* § 377.60, Plaintiff D. PULANE LUCAS is an heir,
18 a successor in interest, and a person lawfully entitled to assert a cause of action for the wrongful
19 death of Stanley Wilson, Jr. No other persons have any claim, right, or interest in the cause of
20 action for the wrongful death of Stanley Wilson, Jr. that is superior to the claims brought by
21 Plaintiffs.

22 3. Plaintiff STANLEY TOBIAS WILSON, SR. was and remains a resident of the State
23 of California, County of Los Angeles and is Stanley Wilson, Jr.’s father (“STANLEY WILSON,
24 SR.”). Plaintiff STANLEY WILSON, SR. is entitled to the property of Stanley Wilson, Jr. under
25 the laws of intestate and testate succession. Pursuant to, without limitation, the operation of Cal.
26 *Civ. Proc. Code* § 377.60, Plaintiff STANLEY WILSON, SR. is an heir, a successor in interest, and
27 a person lawfully entitled to assert a cause of action for the wrongful death of Stanley Wilson, Jr.
28

1 No other persons have any claim, right, or interest in the cause of action for the wrongful death of
2 Stanley Wilson, Jr. that is superior to the claims brought by Plaintiffs.

3 4. Plaintiffs are informed and believe, and thereon allege, that Defendant LOS
4 ANGELES COUNTY SHERIFF'S DEPARTMENT (hereinafter "LACSD") is, and at all relevant
5 times was, a public law enforcement entity with the capacity to sue and be sued. LACSD is
6 responsible for the actions, omissions, policies, procedures, practices, and/or customs of its various
7 agents, employees, independent contractors, and/or joint venturers, including of any and all
8 employees, agents, independent contractors, ostensible agents, representatives, and/or joint
9 venturers, including of the Los Angeles County's Department of Health Services and/or the County
10 Correctional Health Services (collectively, "COUNTY DSH"), and with the defendants named
11 and/or otherwise referenced herein. Defendant LACSD was responsible for assuring that the
12 actions, omissions, policies, procedures, practices, and/or customs of LACSD and the
13 aforementioned complied with the laws and Constitutions of the United States and of the State of
14 California. Plaintiffs are informed and believe, and thereon allege, that Defendant LACSD owned
15 and/or operated LACSD's and/or COUNTY OF LOS ANGELES' Twin Towers Correctional
16 Facility, located at 450 Bauchet St., Los Angeles, CA 90012, where Stanley Wilson, Jr. was held
17 prior to his February 1, 2023 death and where some of the tortious conduct alleged herein occurred.
18 LACSD is responsible for the tortious, unconstitutional, and/or unlawful conduct by authorizing,
19 acquiescing, ratifying, and/or failing to take action to prevent the said conduct. LACSD is further
20 responsible for said conduct by failing to adequately hire, train, supervise, discipline, and/or
21 terminate its employees, independent contractors, and agents, including any and all employees,
22 agents, independent contractors, ostensible agents, representatives, and/or joint venturers of
23 COUNTY DSH that Plaintiffs allege caused Stanley Wilson, Jr.'s February 1, 2023 death.

24 5. Plaintiffs are informed and believe, and thereon allege, that Defendant COUNTY OF
25 LOS ANGELES (hereinafter referred to as "COUNTY") is, and at all relevant times was, a
26 government entity and subdivision of the State of California with the capacity to sue and be sued.
27 At all relevant times herein, Defendant COUNTY is responsible for its actions, omissions, policies,
28 procedures, practices, and/or customs of the COUNTY and its various agents, employees,

1 independent contractors, and/or joint venturers, including LACSD and its agents, employees,
2 independent contractors, and/or joint venturers, and including of any and all employees, agents,
3 independent contractors, ostensible agents, representatives, and/or joint venturers of COUNTY
4 DSH”) and the defendants named and/or otherwise referenced herein. At all times relevant to the
5 facts alleged herein, Defendant COUNTY was responsible for assuring that its actions, omissions,
6 policies, procedures, practices, and/or customs and those of the aforementioned complied with the
7 laws and Constitutions of the United States and of the State of California. Plaintiffs are informed
8 and believe, and thereon allege, that Defendant COUNTY owned and/or operated LACSD’s and/or
9 COUNTY’s Twin Towers Correctional Facility, located at 450 Bauchet St., Los Angeles, CA
10 90012, where Stanley Wilson, Jr. was held prior to his February 1, 2023 death and where some of
11 the tortious conduct alleged herein occurred. COUNTY is responsible for the tortious,
12 unconstitutional, and/or unlawful conduct by authorizing, acquiescing, ratifying, and/or failing to
13 take action to prevent the said conduct. COUNTY is further responsible for said conduct by failing
14 to adequately hire, train, supervise, discipline, and/or terminate its employees, independent
15 contractors, and agents, including any and all employees, agents, independent contractors,
16 ostensible agents, representatives, and/or joint venturers of COUNTY DSH that Plaintiffs allege
17 caused Stanley Wilson, Jr.’s February 1, 2023 death. Collectively LACSD and COUNTY shall be
18 referred to herein as “COUNTY ENTITY DEFENDANTS.”

19 6. Plaintiffs are informed and believe, and thereon allege, that Defendant MICHAEL
20 SMITH, M.D., an individual COUNTY DSH public employee (“MICHAEL SMITH, M.D.”), was
21 at all relevant times an employee acting in their personal and/or official capacity within the course
22 and scope of their employment with COUNTY and/or under the color of state law. Defendant
23 MICHAEL SMITH, M.D. is responsible for the unlawful conduct by, inter alia, participating in the
24 conduct, jointly acting with others who did so, and/or conspiring with others when MICHAEL
25 SMITH, M.D., without limitation, caused Stanley Wilson, Jr.’s injuries and/or constitutional
26 violations and/or authorized, acquiesced to, ratified, and/or failed to take action to prevent the
27 unlawful conduct alleged herein, including on February 1, 2023. All allegations against Defendant
28 COUNTY’s public employee MICHAEL SMITH, M.D. made herein shall be deemed to mean acts,

1 omissions, and/or conduct within his individual capacity and/or in the course and scope of his
2 public employment with COUNTY and acting in concert with all other Defendants as an agent,
3 employee, joint venturer, and/or co-conspirator.

4 7. Plaintiffs are informed and believe, and thereon allege, that Defendant PATTY R.
5 MONTOYA, N.P., an individual COUNTY DSH public employee (“PATTY R. MONTOYA,
6 N.P.”), was at all relevant times an employee acting in their individual and/or official capacity
7 within the course and scope of their employment with COUNTY and/or under the color of state
8 law. Defendant PATTY R. MONTOYA, N.P. is responsible for the unlawful conduct by, inter alia,
9 participating in the conduct, jointly acting with others who did so, and/or conspiring with others
10 when PATTY R. MONTOYA, N.P., without limitation, caused Stanley Wilson, Jr.’s injuries and/or
11 constitutional violations and/or authorized, acquiesced to, ratified, and/or failed to take action to
12 prevent the unlawful conduct alleged herein, including on February 1, 2023. All allegations against
13 Defendant COUNTY’s public employee PATTY R. MONTOYA, N.P. made herein shall be
14 deemed to mean acts, omissions, and/or conduct within the course and scope of his public
15 employment with COUNTY and acting in concert with all other Defendants as an agent, employee,
16 joint venturer, and/or co-conspirator.

17 8. Plaintiffs are informed and believe, and thereon allege, that Defendant JACOB
18 PORTER KUNES, D.O., an individual COUNTY DSH public employee (“JACOB PORTER
19 KUNES, D.O.”), was at all relevant times an employee acting in their individual and/or official
20 capacity within the course and scope of their employment with COUNTY and/or under the color of
21 state law. Defendant JACOB PORTER KUNES, D.O. is responsible for the unlawful conduct by,
22 inter alia, participating in the conduct, jointly acting with others who did so, and/or conspiring with
23 others when JACOB PORTER KUNES, D.O., without limitation, caused Stanley Wilson, Jr.’s
24 injuries and/or constitutional violations and/or authorized, acquiesced to, ratified, and/or failed to
25 take action to prevent the unlawful conduct alleged herein, including on February 1, 2023. All
26 allegations against Defendant COUNTY’s public employee JACOB PORTER KUNES, D.O. made
27 herein shall be deemed to mean acts, omissions, and/or conduct within the course and scope of his
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1 public employment with COUNTY and acting in concert with all other Defendants as an agent,
2 employee, joint venturer, and/or co-conspirator.

3 9. Plaintiffs are informed and believe, and thereon allege, that Defendant QUYEN LU,
4 PHARM. D., A.P., an individual COUNTY DSH public employee (“QUYEN LU, PHARM. D.,
5 A.P.”), was at all relevant times an employee acting in their individual and/or official capacity
6 within the course and scope of their employment with COUNTY and/or under the color of state
7 law. Defendant QUYEN LU, PHARM. D., A.P. is responsible for the unlawful conduct by, inter
8 alia, participating in the conduct, jointly acting with others who did so, and/or conspiring with
9 others when QUYEN LU, PHARM. D., A.P., without limitation, caused Stanley Wilson, Jr.’s
10 injuries and/or constitutional violations and/or authorized, acquiesced to, ratified, and/or failed to
11 take action to prevent the unlawful conduct alleged herein, including on February 1, 2023. All
12 allegations against Defendant COUNTY’s public employee QUYEN LU, PHARM. D., A.P. made
13 herein shall be deemed to mean acts, omissions, and/or conduct within the course and scope of his
14 public employment with COUNTY and acting in concert with all other Defendants as an agent,
15 employee, joint venturer, and/or co-conspirator.

16 10. Plaintiffs are informed and believe, and thereon allege, that Defendant LAKEISHA
17 MCBROOM, an individual COUNTY DSH public employee (“LAKEISHA MCBROOM”), was at
18 all relevant times an employee acting in their individual and/or official capacity within the course
19 and scope of their employment with COUNTY and/or under the color of state law. Defendant
20 LAKEISHA MCBROOM is responsible for the unlawful conduct by, inter alia, participating in the
21 conduct, jointly acting with others who did so, and/or conspiring with others when LAKEISHA
22 MCBROOM, without limitation, caused Stanley Wilson, Jr.’s injuries and/or constitutional
23 violations and/or authorized, acquiesced to, ratified, and/or failed to take action to prevent the
24 unlawful conduct alleged herein, including on February 1, 2023. All allegations against Defendant
25 COUNTY’s public employee LAKEISHA MCBROOM made herein shall be deemed to mean acts,
26 omissions, and/or conduct within the course and scope of his public employment with COUNTY
27 and acting in concert with all other Defendants as an agent, employee, joint venturer, and/or co-
28 conspirator.

1 11. Plaintiffs are informed and believe, and thereon allege, that Defendant
2 THAJUDEEN OLADEPO, an individual COUNTY DSH public employee (“THAJUDEEN
3 OLADEPO”), was at all relevant times an employee acting in their individual and/or official
4 capacity within the course and scope of their employment with COUNTY and/or under the color of
5 state law. Defendant THAJUDEEN OLADEPO is responsible for the unlawful conduct by, inter
6 alia, participating in the conduct, jointly acting with others who did so, and/or conspiring with
7 others when THAJUDEEN OLADEPO, without limitation, caused Stanley Wilson, Jr.’s injuries
8 and/or constitutional violations and/or authorized, acquiesced to, ratified, and/or failed to take
9 action to prevent the unlawful conduct alleged herein, including on February 1, 2023. All
10 allegations against Defendant COUNTY’s public employee THAJUDEEN OLADEPO made herein
11 shall be deemed to mean acts, omissions, and/or conduct within the course and scope of his public
12 employment with COUNTY and acting in concert with all other Defendants as an agent, employee,
13 joint venturer, and/or co-conspirator.

14 12. Plaintiffs are informed and believe, and thereon allege, that Defendant THOMAS D.
15 HAN, D.D.S, an individual COUNTY DSH public employee (“THOMAS D. HAN, D.D.S.”), was
16 at all relevant times an employee acting in their individual and/or official capacity within the course
17 and scope of their employment with COUNTY and/or under the color of state law. Defendant
18 THOMAS D. HAN, D.D.S. is responsible for the unlawful conduct by, inter alia, participating in
19 the conduct, jointly acting with others who did so, and/or conspiring with others when THOMAS
20 D. HAN, D.D.S., without limitation, caused Stanley Wilson, Jr.’s injuries and/or constitutional
21 violations and/or authorized, acquiesced to, ratified, and/or failed to take action to prevent the
22 unlawful conduct alleged herein, including on February 1, 2023. All allegations against Defendant
23 COUNTY’s public employee THOMAS D. HAN, D.D.S. made herein shall be deemed to mean
24 acts, omissions, and/or conduct within the course and scope of his public employment with
25 COUNTY and acting in concert with all other Defendants as an agent, employee, joint venturer,
26 and/or co-conspirator.

27 13. Plaintiffs are informed and believe, and thereon allege, that Defendant DIRECTOR
28 TIMOTHY BELAVICH, Ph.D. an individual COUNTY DSH public employee (“DIRECTOR

1 BELAVICH”), was at all relevant times an employee acting in their individual and/or official
2 capacity within the course and scope of their employment with COUNTY and/or under the color of
3 state law. At all relevant times, DIRECTOR BELAVICH was responsible for overseeing the
4 management and/or control of the healthcare services provided to incarcerated persons in the
5 custody of COUNTY ENTITY DEFENDANTS, including of those pre-trial detainees incarcerated
6 at the Twin Towers Correctional Facility, like Stanley Wilson, Jr. As such, based upon information
7 and belief, DIRECTOR BELAVICH was responsible for developing, initiating, implementing,
8 promulgating, and/or maintaining reasonable training, retention, and/or supervision of COUNTY
9 ENTITY DEFENDANTS’ employees, agents, independent contractors, representatives, ostensible
10 agents, and/or joint venturers as it relates to the provision of medical care and/or treatment of
11 incarcerated persons at the Twin Towers Correctional Facility. Based on the foregoing,
12 DIRECTOR BELAVICH is responsible for the unlawful conduct by, inter alia, directly
13 participating in the tortious conduct and/or constitutional violations alleged herein, jointly acting in
14 concert with others who did, authorizing, acquiescing, and/or ratifying the alleged tortious conduct
15 and/or constitutional violations alleged herein, and/or failing to take reasonable action to prevent
16 the unlawful conduct alleged herein from occurring.

17 14. Plaintiffs are informed and believe, and thereon allege, that Defendant ASSISTANT
18 SHERIFF PAULA L. TOKAR, an individual LACSD public employee (“ASSISTANT SHERIFF
19 TOKAR”), was at all relevant times an employee acting in their individual and/or official capacity
20 within the course and scope of their employment with COUNTY, and/or under the color of state
21 law. At all relevant times, ASSISTANT SHERIFF TOKAR was responsible for the management
22 and operational control of the Twin Towers Correctional Facility. As such, based upon information
23 and belief, ASSISTANT SHERIFF TOKAR was responsible for developing, initiating,
24 implementing, promulgating, and/or maintaining adequate training, retention, and/or supervision of
25 COUNTY ENTITY DEFENDANTS’ employees, agents, independent contractors, representatives,
26 ostensible agents, and/or joint venturers at Twin Towers Correctional Facility as it relates to the
27 management and operational control of the Twin Towers Correctional Facility. Based on the
28 foregoing, ASSISTANT SHERIFF TOKAR is responsible for the unlawful conduct by, inter alia,

1 directly participating in the tortious conduct and/or constitutional violations alleged herein, jointly
2 acting in concert with others who did, authorizing, acquiescing, and/or ratifying the alleged tortious
3 conduct and/or constitutional violations alleged herein, and/or failing to take reasonable action to
4 prevent the unlawful conduct alleged herein from occurring.

5 15. Plaintiffs are informed and believe, and thereon allege, that Defendant CHIEF
6 TANIA PLUNKETT, an individual LACSD public employee, (“CHIEF PLUNKETT”) was at all
7 relevant times an employee acting in their individual and/or official capacity within the course and
8 scope of their employment with COUNTY, and/or under the color of state law. At all relevant
9 times, CHIEF PLUNKETT was responsible for the management and operational control of the
10 Twin Towers Correctional Facility. As such, based upon information and belief, CHIEF
11 PLUNKETT was responsible for developing, initiating, implementing, promulgating, and/or
12 maintaining adequate training, retention, and/or supervision of COUNTY ENTITY
13 DEFENDANTS’ employees, agents, independent contractors, representatives, ostensible agents,
14 and/or joint venturers at Twin Towers Correctional Facility as it relates to the management and
15 operational control of the Twin Towers Correctional Facility. Based on the foregoing, CHIEF
16 PLUNKETT is responsible for the unlawful conduct by, inter alia, directly participating in the
17 tortious conduct and/or constitutional violations alleged herein, jointly acting in concert with others
18 who did, authorizing, acquiescing, and/or ratifying the alleged tortious conduct and/or
19 constitutional violations alleged herein, and/or failing to take reasonable action to prevent the
20 unlawful conduct alleged herein from occurring.

21 16. Plaintiffs are informed and believe, and thereon allege that, at all times relevant and
22 mentioned herein, DEFENDANTS, including DOES 18 to 50 (herein after “DOE
23 DEFENDANTS”), and each of them, were agents, independent contractors, employees, employers,
24 co-conspirators, and/or joint venturers of their co-Defendants, and each of them, and were acting
25 within the course, scope and authority of said agency, employment, contracting relationship, and/or
26 joint venture and that each and all DEFENDANTS, as aforesaid, when acting as a principal, was,
27 without limitation, negligent in the selection and hiring, retention, training, and supervision of each
28

1 and every other DEFENDANT as an agent, employee, independent contractor, and/or joint
2 venturer.

3 17. Plaintiffs are informed and believe, and thereon allege that, at all times relevant and
4 mentioned herein, DOE DEFENDANTS caused and are responsible for the tortious,
5 unconstitutional, and/or unlawful conduct described herein by participating individually in the
6 conduct or acting jointly and in concert with others who did so, by authorizing, acquiescing,
7 ratifying, and/or failing to take action to prevent the tortious, unconstitutional, and unlawful
8 conduct, by promulgating policies, practices, and/or procedures pursuant to which the unlawful
9 conduct alleged herein occurred, by failing and refusing, with deliberate indifference to Stanley
10 Wilson, Jr.'s and PLAINTIFFS' rights, to initiate and maintain adequate supervision and/or
11 training, and/or by ratifying the unlawful conduct that occurred by agents, employees, independent
12 contractors, and/or agents under their direction and control. Whenever and wherever reference is
13 made in this Complaint to any act by a DEFENDANT and/or DOE DEFENDANTS, such
14 allegation and references shall also be deemed to mean the acts and failure to act of each Defendant
15 individually, jointly, and severally. They are sued in their individual and/or official capacities and
16 in some manner are responsible for the acts and omissions alleged herein.

17 18. The true names and capacities, whether individual, plural, corporate, partnership,
18 associate, or otherwise, of DOE DEFENDANTS, inclusive, are unknown to PLAINTIFFS, who
19 therefore sues said DOE DEFENDANTS by such fictitious names. The full extent of the facts
20 linking such fictitiously sued DOE DEFENDANTS is unknown to PLAINTIFFS. PLAINTIFFS
21 are informed and believe and thereon allege that each of the Defendants designated herein as a
22 DOE DEFENDANT was, and is, negligent, or in some other actionable manner, responsible for the
23 tortious, unconstitutional, and/or unlawful events and happenings hereinafter referred to and
24 thereby negligently, or in some other actionable manner, legally and proximately caused the
25 hereinafter described injuries and damages to Stanley Wilson, Jr. and PLAINTIFFS. PLAINTIFFS
26 will hereafter seek leave of the Court to amend this Complaint to show the DOE DEFENDANTS'
27 true names and capacities after the same have been ascertained.

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of its agents, employees, independent contractors, and/or joint venturers pursuant to, without limitation, California *Government Code* §§ 815.2, 815.4, and/or 815.6, and *Cal. Const. Art*, Sec. 1, 4, 7, 10, 13, 17 and/or 26. Based on the foregoing, PLAINTIFFS’ claims against COUNTY ENTITY DEFENDANTS are timely brought by and through the filing of this Complaint.

GENERAL ALLEGATIONS

25. Stanford University Graduate and former Detroit Lions cornerback Stanley Wilson Jr. died on February 1, 2023, at the age of 40, while in the custody of the COUNTY ENTITY DEFENDANTS.

26. Prior to his death, since August 24, 2022, Stanley Wilson, Jr. had been in the custody of COUNTY ENTITY DEFENDANTS,

LOS ANGELES COUNTY UNIFIED				
BEHAVIORAL OBSERVATION AND MENTAL HEALTH REFERRAL				
1	AGENCY: LAPD	REPORT #:		
	AGENCY CODE:	LASD REFERENCE #:		
2	INMATE INFORMATION			
	LAST NAME: WILSON	FIRST NAME: STANLEY	BOOKING #: 6450653	
	DOB: 11/05/1982	RACE: B	CHARGE: 459 P.C.	
	SPECIAL HANDLING: MHT	HOUSING LOCATION: HWD	FACILITY: LAPD HWD	
3	BEHAVIORAL INDICATORS (CHECK ANY THAT APPLY)			
	<input type="checkbox"/> SUICIDAL STATEMENTS OR ACTIONS	<input type="checkbox"/> DANGER TO OTHER INMATES	<input type="checkbox"/> DANGER TO STAFF	
4	OBSERVATIONS			
	INCIDENT DATE: 8/24/22	TIME: 1245	LOCATION: LAPD HWD	
	OBSERVED BEHAVIORS: <input type="checkbox"/> UNABLE TO FOLLOW SIMPLE INSTRUCTIONS <input type="checkbox"/> DISORIENTATION <input type="checkbox"/> BLANK STARE			
	<input type="checkbox"/> WITHDRAWN <input type="checkbox"/> CRYING <input type="checkbox"/> SHAKING <input type="checkbox"/> COMBATIVE/HOSTILE <input type="checkbox"/> RAPID/CONTINUOUS SPEECH			
	<input type="checkbox"/> SOLILOQUY <input checked="" type="checkbox"/> GOBBLEDEGAWK <input type="checkbox"/> CONFUSION <input type="checkbox"/> DELUSIONS <input checked="" type="checkbox"/> RAMBLING SPEECH			
	<input type="checkbox"/> HALLUCINATIONS <input type="checkbox"/> IMPAIRED MEMORY <input type="checkbox"/> PARANOIA <input type="checkbox"/> NONE OBSERVED			
	COMMENTS: MENTAL HEALTH			

including, during this time, at its Twin Towers for property-related charges. A COUNTY ENTITY DEFENDANTS Behavioral Observation and Mental Health Referral dated August 24, 2022 documents that **Stanley Wilson, Jr. required mental health “special handling,”** even while being detained at the Los Angeles Police Department’s Hollywood facility.

27. Soon after being subsequently placed into COUNTY ENTITY DEFENDANTS custody at Twin Towers on through the time of his death on February 1, 2023, COUNTY ENTITY DEFENDANTS records document **ongoing concerns** related to Stanley Wilson, Jr.’s health conditions, including concerns requiring immediate mental health attention, treatment, and further assessment and/or evaluation.

28. On August 27, 2022, COUNTY ENTITY DEFENDANTS records document that Stanley Wilson, Jr. was presenting with, without limitation, psychotic symptoms and endorsing

1 with perceptual disturbances and delusional disorder while in the custody of COUNTY ENTITY
2 DEFENDANTS, including throughout the time COUNTY DSH DEFENDANTS and/or
3 DIRECTOR BELAVICH failed to provide Stanley Wilson, Jr. with the medical care and/or
4 treatment he needed, as it was ordered by a court at the time of the November 7, 2022 Court Order.
5 The COUNTY ENTITY DEFENDANTS document that Stanley Wilson, Jr. “cannot safely be
6 treated in a setting that requires independent control of his behavior” and was to be housed for
7 further “stabilization and observation” and to be scheduled for “Care Transitions for release
8 planning.”

9 29. On September 3, 2022, COUNTY ENTITY DEFENDANTS’ inmate records
10 document that Stanley Wilson, Jr. had “multiple serious health issue[s].”

11 30. On or about October 13, 2022, the COUNTY ENTITY DEFENDANTS’ Mental
12 Health Division found Stanley Wilson Jr. incompetent to stand trial for charges brought against
13 him by the COUNTY ENTITY DEFENDANTS. The COUNTY ENTITY DEFENDANTS
14 further found that Stanley Wilson, Jr. lacked the capacity to make decisions regarding his medical
15 treatment while in custody of COUNTY ENTITY DEFENDANTS. The COUNTY ENTITY
16 DEFENDANTS found that it was medically appropriate to treat Stanley Wilson, Jr.’s psychiatric
17 condition with psychotropic medications in an objectively reasonable manner as prescribed by
18 treating psychiatrists.

19 31. Based on information and belief, on or about November 2, 2022, a COUNTY
20 ENTITY DEFENDANTS’ forensic evaluator recommended that Stanley Wilson, Jr. receive
21 competency training in a forensic setting approved by the California Department of State
22 Hospitals.

23 32. Based on information and belief, on or about November 7, 2022, the Court ordered
24 that Stanley Wilson, Jr. be committed to California Department of State Hospitals’ Metropolitan
25 State Hospital no later than December 5, 2022.

26 33. Importantly, at all relevant times, between August 24, 2022, the date Stanley Wilson,
27 Jr. entered the custody of COUNTY ENTITY DEFENDANTS, up to February 1, 2023, the date of
28 Stanley Wilson, Jr.’s death, COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS

1 DEFENDANTS, prescribed, managed, and/or otherwise controlled the medical care and/or
2 treatment, including the medical regiment of medications, prescription, and/or orders, of Stanley
3 Wilson, Jr. During the time COUNTY DSH DEFENDANTS were prescribing, managing, and/or
4 otherwise controlling Stanley Wilson, Jr.'s medical care and/or treatment – or lack thereof –
5 COUNTY DHS DEFENDANTS knew and/or should have known of the severity and exigency of
6 medical care and/or treatment required for Stanley Wilson, Jr and that he was to be transferred to
7 the Metropolitan State Hospital for treatment and care that was otherwise unavailable at the Twin
8 Towers Correctional Facility. Moreover, LACSD CUSTODIAL DEFENDANTS knew and/or
9 should have known that the November 7, 2022 Court Order required that Stanley Wilson, Jr. be
10 transferred the Metropolitan State Hospital by December 5, 2022. Despite the November 7, 2022
11 Order, COUNTY DHS DEFENDANTS' and LACSD CUSTODIAL DEFENDANTS failed to
12 take reasonable steps to comply with the December 5, 2022 deadline, which denied Stanley
13 Wilson, Jr. of the immediate and emergency medical care ordered by the Court and which
14 constitutes a proximate cause of his death.

15 34. Furthermore, at all relevant times, between August 24, 2022, the date Stanley
16 Wilson, Jr. entered the custody of COUNTY ENTITY DEFENDANTS, up to February 1, 2023,
17 the date of Stanley Wilson, Jr.'s death, COUNTY ENTITY DEFENDANTS, by and through
18 DIRECTOR BELAVICH and DOE DEFENDANTS, oversaw, managed, ratified, authorized,
19 controlled, and/or otherwise acquiesced the development, creation, implementation, and/or
20 otherwise enforcement of the policies, practices, and/or procedures followed by COUNTY DSH
21 DEFENDANTS, including as it pertained to the prescription, management, and/or otherwise
22 control of Stanley Wilson, Jr.'s medical and mental health care and/or treatment, or lack thereof.
23 Specifically, DIRECTOR BELAVICH and DOE DEFENDANTS knew and/or should have known
24 that the November 7, 2022 Court Order determined that Stanley Wilson, Jr. suffered from an
25 emergency medical condition that required immediate medical care and/or mental health treatment
26 at the Metropolitan State Hospital by December 5, 2022. Despite the November 7, 2022 Order,
27 DIRECTOR BELAVICH and DOE DEFENDANTS, in conscious and reckless disregard for the
28 rights and safety of Stanley Wilson, Jr., failed to develop, create, implement, and/or otherwise

1 enforce policies, procedures, and/or practices so that COUNTY DSH DEFENDANTS could take
2 reasonable steps to comply with the December 5, 2022 deadline and/or otherwise summon such
3 immediate and emergency medical care and/or treatment, as required to aid Stanley Wilson, Jr.

4 35. Similarly, at all relevant times, between August 24, 2022, the date Stanley Wilson,
5 Jr. entered the custody of COUNTY ENTITY DEFENDANTS, up to February 1, 2023, COUNTY
6 ENTITY DEFENDANTS, by and through LACSD CUSTODIAL DEFENDANTS, oversaw,
7 managed, ratified, authorized, controlled, and/or otherwise acquiesced in the development,
8 creation, and/or implementation of the management and operational control of the Twin Towers
9 Correctional Facility, including of its custodial staff and incarcerated persons, like Stanley Wilson,
10 Jr. Specifically, LACSD CUSTODIAL DEFENDANTS knew and/or should have known that the
11 November 7, 2022 Court Order determined that LACSD CUSTODIAL DEFENDANTS were
12 required to engage in the logistical management and/or operational control of Stanley Wilson, Jr.,
13 so as to comply with the court order by transporting him to the Metropolitan State Hospital.
14 Despite the November 7, 2022 Order, LACSD CUSTODIAL DEFENDANTS, in conscious and
15 reckless disregard for the rights and safety of Stanley Wilson, Jr., failed to activate, engage, and/or
16 otherwise trigger the management and/or operational control of Twin Towers Correctional Facility
17 so as to transport Stanley Wilson, Jr. by the December 5, 2022 deadline, pursuant to the November
18 7, 2022 Court Order.

19 36. Based on information and belief and without limitation, following the November 7,
20 2022 Court Order, COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS
21 DEFENDANTS and DIRECTOR BELAVICH, were on notice of the following related to Stanley
22 Wilson, Jr.:

- 23 • Stanley Wilson, Jr. had documented serious and deteriorating health issues that
24 required immediate mental health attention, treatment, and further assessment and/or
25 evaluation.
- 26 • Stanley Wilson, Jr. was presenting with, without limitation, psychotic symptoms and
27 endorsing with perceptual disturbances and delusional disorder that required
28 stabilization and observation and was to be scheduled for care transition for release

1 planning.

- 2 • Stanley Wilson, Jr. was repeatedly documented as having serious and deteriorating
- 3 health issues requiring medical attention.
- 4 • Stanley Wilson, Jr. had been found incompetent to stand trial and lacked the capacity
- 5 to make decisions regarding his medical treatment while in custody.
- 6 • Stanley Wilson, Jr.'s psychiatric condition required treatment with psychotropic
- 7 medications to be prescribed by treating psychiatrists.
- 8 • Stanley Wilson, Jr. was recommended to receive competency training in a forensic
- 9 setting approved by the California Department of State Hospitals.
- 10 • On November 7, 2022, the Court ordered that Stanley Wilson, Jr. be committed to
- 11 California Department of State Hospitals 'Metropolitan State Hospital for treatment
- 12 by December 5, 2022.

13 37. Based on information and belief, following the issuance of the November 7, 2022
14 court order, COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS,
15 had a duty to comply with said order, specifically to timely provide Stanley Wilson, Jr. with needed
16 medical care at Metropolitan State Hospital. Despite the duty to timely comply with the November
17 7, 2022 order, COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS
18 DEFENDANTS, intentionally, recklessly, and/or conscious disregard of Stanley Wilson, Jr.'s
19 constitutional right to medical care violated said order by failing to reasonably and timely provide
20 Stanley Wilson, Jr. with needed medical care by December 5, 2022 at the Metropolitan State
21 Hospital.

22 38. Based on information and belief, following the issuance of the November 7, 2022
23 Court Order, COUNTY ENTITY DEFENDANTS, by and through LACSD CUSTODIAL
24 DEFENDANTS, had a duty to comply with said order, specifically to timely activate, engage,
25 and/or otherwise trigger the logistical management and operational control of Stanley Wilson, Jr.,
26 so as to transport him to the Metropolitan State Hospital. Despite this duty to timely comply with
27 the November 7, 2022 Court Order, COUNTY ENTITY DEFENDANTS, by and through LACSD
28 CUSTODIAL DEFENDANTS, intentionally, recklessly, and/or in conscious disregard of Stanley



1 Wilson, Jr.'s constitutional rights violated said order by failing to reasonably and timely activate,
2 engage, and/or otherwise trigger the logistical management and operational control of Stanley
3 Wilson, Jr., so as to timely transport him to the Metropolitan State Hospital by the December 5,
4 2022 deadline ordered by the November 7, 2022 Court Order.

5 39. Based on information and belief, COUNTY ENTITY DEFENDANTS, by and
6 through COUNTY DHS DEFENDANTS and DIRECTOR BELAVICH, also denied Stanley
7 Wilson, Jr. medical care in, without limitation, the following ways: (1) failing to provide reasonable
8 and necessary medical and/or mental health care during the entirety of Stanley Wilson, Jr.'s care
9 while he was held in custody at Twin Towers, including to properly, reasonably, and/or safely treat
10 and stabilize his known deteriorating serious health issues in a hospital setting as required pursuant
11 to the Court Order during a time in which he required immediate medical/mental health attention,
12 treatment, assessment and/or evaluation; (2) failing to safely and properly prescribe, administer,
13 monitor, and/or supervise Stanley Wilson, Jr.'s medication regimen, instead, based upon
14 information and belief, negligently administering a combination of medications that unreasonably
15 increased the likelihood of physical conditions known to result in pulmonary embolisms, including
16 when in custody at Twin Towers and/or in restraints, and failing to properly monitor and supervise
17 Stanley Wilson, Jr. to prevent the development of fatal side effects stemming from the
18 unreasonably heightened risks associated with said medications and the carceral environment; (3)
19 failing to safely and properly adjust Stanley Wilson Jr.'s daily routine and carceral environment
20 including, without limitation, day-to-day activities required for his physical and/or mental health
21 while in custody at the Twin Towers Correctional Facility so as to reasonably prevent the
22 development of pulmonary embolisms and/or to reasonably minimize the increased likelihood of
23 developing a pulmonary embolism or other fatal condition; and (4) failing to provide timely,
24 reasonable, and/or adequate monitoring, supervision, screenings, examinations, and/or otherwise
25 tests so as to have timely detected the clear and known symptoms of physical conditions related to
26 the development of pulmonary embolisms and/or other fatal physical conditions, which, based upon
27 information and belief, were known and/or should have been known to cause serious physical
28 injury to and/or the death of Stanley Wilson, Jr. while in County Defendants' custody at Twin

1 Towers.

2 40. Medical records from COUNTY ENTITY DEFENDANTS' Correctional Health
3 Services during the time that Stanley Wilson, Jr. remained at COUNTY ENTITY
4 DEFENDANTS' Twin Towers Correctional Facility document a diagnosis of "[u]nspecified
5 psychosis not due to a substance or known physiological condition." Medical records document
6 that Stanley Wilson, Jr. did not have suicidal ideation, instead documenting his belief that "suicide
7 is wrong." Stanley Wilson, Jr. reported perceptual disturbances while in custody of COUNTY
8 ENTITY DEFENDANTS' related to hearing and seeing voices and sounds.

9 41. During this time, Stanley Wilson, Jr. sought treatment from COUNTY ENTITY
10 DEFENDANTS' Correctional Health Services for, without limitation. chronic tension headaches,
11 chronic insomnia, and toothaches.

<p>Medical Care Check Box</p>  <input type="checkbox"/>	<p>Date problem started: <u>11/15/22</u></p> <p>I have the following request:</p> <p><u>URGENT CARE NEEDED!!!</u></p>
<p>Dental Care Check Box</p>  <input checked="" type="checkbox"/> <p><small>(Cleanings are scheduled after one year of)</small></p>	<p><u>I AM EXPERIENCING</u> <u>EXTREME PAIN IN ONE OF</u> <u>MY MOLARS WHEN EATING</u> <u>AND DRINKING.</u></p> <p><u>I AM ALSO UNABLE TO SLEEP.</u></p>

21 42. For 59 days while Stanley Wilson, Jr. was a pre-trial detainee – from the November
22 7, 2022 court order that Stanley Wilson, Jr. receive treatment at California Department of State
23 Hospitals' Metropolitan State Hospital to the date of his February 1, 2023 death – COUNTY
24 ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS and DIRECTOR
25 BELAVICH, jointly and severally denied Stanley Wilson, Jr. both the court-ordered and medically
26 necessary health care that constitute substantial factors that caused injury and/or death to Stanley
27 Wilson, Jr and also constitute constitutional violations related to Stanley Wilson's conditions of
28 confinement and denial of needed medical care as a pre-trial detainee.

1 43. Furthermore, for 59 days while Stanley Wilson, Jr. was a pre-trial detainee – from
2 the deadline of the November 7, 2022 Court Order that Stanley Wilson, Jr. be transported to the
3 Metropolitan State Hospital to the date of his February 1, 2023 death – COUNTY ENTITY
4 DEFENDANTS, by and through LACSD CUSTODIAL DEFENDANTS, jointly and severally
5 violated the November 7, 2022 Court Order by failing to activate, engage, and/or otherwise trigger
6 the logistical management and/or operational control of Stanley Wilson, Jr. so that he could be
7 timely transported to the Metropolitan State Hospital. COUNTY ENTITY DEFENDANTS, by
8 and through LACSD CUSTODIAL DEFENDANTS, violated the November 7, 2022 order, which
9 constituted a substantial factor that caused injury and/or death to Stanley Wilson, Jr.

10 44. At all relevant times – from the November 7, 2022 court order that Stanley Wilson,
11 Jr. receive treatment at California Department of State Hospitals’ Metropolitan State Hospital by
12 December 5, 2022 to the date of his February 1, 2023 death – COUNTY ENTITY
13 DEFENDANTS, by and through COUNTY DHS DEFENDANTS and DIRECTOR BELAVICH,
14 jointly and severally owed a duty to Stanley Wilson to provide the court-ordered and medically
15 necessary health care and failed to do so. Despite these duties, including those imposed by the
16 November 7, 2022 court order, COUNTY ENTITY DEFENDANTS, by and through COUNTY
17 DHS DEFENDANTS and DIRECTOR BELAVICH, affirmatively took actions that prevented said
18 care and/or failed to take actions to provide said care for approximately 59 days in defiance of said
19 order. These failures by COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS
20 DEFENDANTS and DIRECTOR BELAVICH, constitute substantial factors that caused injury
21 and/or death to Stanley Wilson, Jr and also constitute constitutional violations related to Stanley
22 Wilson’s conditions of confinement and denial of needed medical care as a pre-trial detainee.

23 45. On February 1, 2023, after 59 days had elapsed from the November 7, 2022 Court
24 Order’s deadline to transport Stanley Wilson Jr. to Metropolitan State Hospital, COUNTY
25 ENTITY DEFENDANTS and , jointly and severally arranged to finally have Stanley Wilson, Jr.
26 transported to California Department of State Hospitals’ Metropolitan State Hospital to be
27 admitted as a “forensic patient.” And, after 59 days had elapsed from the November 7, 2022 Court
28 Order’s deadline to provide Stanley Wilson Jr. with medical care at Metropolitan State Hospital,

1 on February 1, 2023, COUNTY ENTITY DEFENDANTS, by and through LACSD CUSTODIAL
2 DEFENDANTS, jointly and severally activated, engaged and/or otherwise triggered the logistical
3 management and/or operational control of Stanley Wilson, Jr. so as to transport him to the
4 Metropolitan State Hospital.

5 46. However, instead of receiving timely, reasonable, and adequate medical treatment
6 for his mental health disorder and known physical health throughout his time at Twin Towers,
7 including between November 7, 2022 through February 1, 2023 when Stanley Wilson, Jr.'s health
8 was deteriorating, COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS
9 DEFENDANTS and DIRECTOR BELAVICH, deprived Stanley Wilson, Jr. of necessary and
10 immediate medical care and/or treatment necessary to treat his emergency medical condition at the
11 Metropolitan State Hospital in direct violation of the duties owed to Stanley Wilson, Jr. as a pre-
12 trial detainee, and as required by the November 7, 2022 Court Order. Rather, as a result of
13 COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS,
14 deprivation of necessary and immediate medical care, Stanley Wilson, Jr. succumbed to the
15 severity of his deteriorating health on February 1, 2023, at or about 10:27 a.m. Moreover, based
16 on information and belief, Stanley Wilson, Jr. was subjected to unlawful and unwarranted threats,
17 intimidation, and/or otherwise coercion at the hands of the COUNTY DHS DEFENDANTS.
18 COUNTY DHS DEFENDANTS' threats, intimidation, and/or otherwise coercion caused Stanley
19 Wilson, Jr. to reasonably believe that if he exercised his right to medical care, then COUNTY
20 DHS DEFENDANTS would commit violence against him and had the apparent ability to do so.
21 Moreover, based on the foregoing, DIRECTOR BELAVICH acquiesced, authorized, and/or
22 otherwise ratified COUNTY DHS DEFENDANTS' threats, intimidations, and/or otherwise
23 coercion as to Stanley Wilson, Jr., as alleged herein. Said unlawful and unwarranted threats,
24 intimidation, and/or otherwise coercion at the hands of the COUNTY DHS DEFENDANTS
25 constitute violations of Stanley Wilson, Jr.'s constitutional rights.

26 47. Moreover, instead of being providing safe conditions of confinement throughout
27 his time at Twin Towers, including between November 7, 2022 through February 1, 2023 when
28 Stanley Wilson, Jr.'s health was deteriorating, COUNTY ENTITY DEFENDANTS, by and

1 through LACSD CUSTODIAL DEFENDANTS, subjected Stanley Wilson, Jr. to unreasonable,
2 unsafe, and unjust conditions of confinement, including, without limitation, by subjecting him to:

- 3 • insufficient out-of-cell time and physical activity, which lead to and/or contribute to
4 physical deterioration and susceptibility to developing deep vein thrombosis and/or
5 increased risks of suffering and dying from pulmonary embolisms and/or lead to and/or
6 contribute to mental and emotional deterioration, especially for individuals, like Stanley
7 Wilson, Jr., who require mental health stabilization, care, and attention;
- 8 • unwanted levels of isolation, which lead to and/or contributed to physical deterioration
9 and/or to mental and emotional deterioration, especially for individuals, like Stanley
10 Wilson, Jr., who require mental health stabilization, care, and attention
- 11 • uninhabitable and unsafe sanitary conditions, such as malfunctioning plumbing, insufficient
12 ventilation, and/or vermin and insect infestations, which lead to and/or contribute to
13 physical, mental, and emotional deterioration, especially for individuals, like Stanley
14 Wilson, Jr., who require physical and mental health stabilization, care, and attention;
- 15 • debilitating conditions, such as inadequate air conditioning systems, lack of ventilation, and
16 lack of appropriate clothing for incarcerated persons, which lead to and/or contribute to
17 physical, mental, and emotional deterioration, especially for individuals, like Stanley
18 Wilson, Jr., who require physical and mental health stabilization, care, and attention;
- 19 • deprivation of basic hygienic supplies and/or products, such as lack of regular showers,
20 personal hygiene products, laundry services, clean clothing, and bedding, which lead to
21 and/or contribute to physical, mental, and emotional deterioration, especially for
22 individuals, like Stanley Wilson, Jr., who require physical and mental health stabilization,
23 care, and attention;
- 24 • inappropriate and/or inedible food products, including food diets in contravention of known
25 medical conditions, which lead to and/or contribute to physical, mental, and emotional
26 deterioration, especially for individuals, like Stanley Wilson, Jr., who require physical and
27 mental health stabilization, care, and attention; and/or
- 28 • the negligent administration of medical regiments and food diets in contravention of known

1 medical conditions, which lead to and/or contribute to physical, mental, and emotional
2 deterioration, especially for individuals, like Stanley Wilson, Jr., who require physical and
3 mental health stabilization, care, and attention and/or lead to and/or contribute to physical
4 deterioration and susceptibility to developing deep vein thrombosis and/or increased risks of
5 suffering and dying from pulmonary embolisms.

6 As a result of COUNTY ENTITY DEFENDANTS', by and through LACSD CUSTODIAL
7 DEFENDANTS, provision of said unreasonable, unsafe, and unjust conditions of confinement
8 caused Stanley Wilson, Jr.'s physical, mental, and emotional condition continued to deteriorate
9 during his incarceration at Twin Towers, which precipitated his death on February 1, 2023, at or
10 about 10:27 a.m. Moreover, based on information and belief, Stanley Wilson, Jr. was subjected to
11 unlawful and unwarranted threats, intimidation, and/or otherwise coercion at the hands of the
12 LACSD CUSTODIAL DEFENDANTS. LACSD CUSTODIAL DEFENDANTS' threats,
13 intimidation, and/or otherwise coercion caused Stanley Wilson, Jr. to reasonably believe that if he
14 exercised his right to medical care, then COUNTY DHS DEFENDANTS would commit violence
15 against him and had the apparent ability to do so. Moreover, based on the foregoing, LACSD
16 CUSTODIAL DEFENDANTS' leadership acquiesced, authorized, and/or otherwise ratified
17 LACSD CUSTODIAL DEFENDANTS' threats, intimidations, and/or otherwise coercion as to
18 Stanley Wilson, Jr., as alleged herein. Said unlawful and unwarranted threats, intimidation, and/or
19 otherwise coercion at the hands of the LACSD CUSTODIAL DEFENDANTS constitute violations
20 of Stanley Wilson, Jr.'s constitutional rights.

21 48. Based on information and belief, despite that an inmate death triggers an initial death
22 report generated by the prison in which the death occurs that includes a mortality review by both a
23 physician and nurse reviewer, COUNTY ENTITY DEFENDANTS, including by and through
24 COUNTY DHS DEFENDANTS and LACSD CUSTODIAL DEFENDANTS, and each of them,
25 failed and/or refused to conduct, timely or otherwise, the required review, and, based on
26 information and belief, no such report or review, timely or otherwise, has been conducted related
27 to the death of Stanley Wilson, Jr. As such, despite requirements that an extensive review be
28 conducted of Stanley Wilson, Jr.'s clinical record, dating back at least 6 months prior to his

1 February 1, 2023 death, no such review, timely or otherwise, has been conducted.

2 49. As is and has been the case with Stanley Wilson, Jr.’s parents, D. PULANE LUCAS
3 and STANLEY WILSON, SR., families have been left living in “purgatory” with inaccurate
4 and/or little to no information of loved ones who have died within the custody of COUNTY
5 ENTITY DEFENDANTS. Indeed, it took PLAINTIFFS approximately 902 days – from the date
6 of Stanley Wilson, Jr.’s death to the date COUNTY ENTITY DEFENDANTS provided
7 PLAINTIFFS with outstanding video production reflecting Stanley Wilson, Jr.’s path of travel on
8 the date of his death – to receive video surveillance footage that showed Stanley Wilson, Jr.’s
9 movements on February 1, 2023 prior to his death.

10 50. Based on information and belief, PLAINTIFFS allege that COUNTY PUBLIC
11 EMPLOYEE DEFENDANTS, have widely and misleadingly mischaracterized the cause and
12 circumstances of Stanley Wilson, Jr.’s death, specifically that Stanley Wilson, Jr.’s death was
13 “natural,” attributable to the rapid onset of a pulmonary thromboembolism that had nothing to do
14 with either the deprivation of medical care and unlawful conditions of confinement alleged herein.
15 After months-long efforts to obtain relevant documentation, including Stanley Wilson, Jr.’s
16 medical records while in the custody of COUNTY ENTITY DEFENDANTS from August 24,
17 2022 through his death on February 1, 2023, PLAINTIFFS hereon allege Stanley Wilson, Jr.’s
18 death is directly attributable to COUNTY ENTITY DEFENDANTS’ deprivation of necessary and
19 immediate medical care and/or treatment and/or provision of unreasonable, unsafe, and unjust
20 conditions of confinement to Stanley Wilson, Jr., including in direct violation of the November 7,
21 2022 Court Order that ordered them to be timely transported away from the Twin Towers
22 Correctional Facility to receive adequate and necessary medical care and/or treatment at the
23 Metropolitan State Hospital. PLAINTIFFS hereon allege COUNTY ENTITY DEFENDANTS’
24 failure to provide adequate and reasonable medical care and treatment and/or reasonable, safe, and
25 just conditions of confinement to Stanley Wilson, Jr. throughout the period he remained in their
26 custody and/or care caused Stanley Wilson, Jr.’s injuries and damages, including his death on
27 February 1, 2023. Furthermore, PLAINTIFFS hereon allege COUNTY ENTITY DEFENDANTS’
28 failure to provide adequate and reasonable medical care and treatment and/or reasonable, safe, and

1 just conditions of confinement in contravention of the November 7, 2022 Court Order constitutes
2 violations of Stanley Wilson, Jr.'s constitutional and statutory rights.

3 51. Based on information and belief, PLAINTIFFS allege that, from August 24, 2022
4 through Stanley Wilson, Jr.'s death on February 1, 2023, COUNTY DHS DEFENDANTS and/or
5 LACSD CUSTODIAL DEFENDANTS, without limitation, engaged Stanley Wilson, Jr. without
6 the sufficient training and/or supervision to properly interact with people like him who are known
7 to be struggling with mental health issues and/or emergency medical conditions.

8 52. Based on information and belief, PLAINTIFFS allege that, by failing to properly and
9 safely engage Stanley Wilson, Jr. – who was a mentally incompetent individual suffering from an
10 emergency medical condition in COUNTY ENTITY DEFENDANTS' custody and care – without
11 sufficient, required, and/or appropriate training and supervision, COUNTY DHS DEFENDANTS
12 and/or COUNTY CUSTODIAL DEFENDANTS displayed and practiced established customs,
13 policies, procedures, practices, and/or protocols that amounted to a conscious and reckless
14 disregard to Stanley Wilson, Jr.'s safety and constitutional and statutory rights, including a
15 deprivation of Stanley Wilson, Jr.'s constitutional right to medical care and/or his constitutional
16 right to reasonable, safe, and just conditions of confinement. Moreover, at all relevant times,
17 COUNTY ENTITY DEFENDANTS, by and through DIRECTOR BELAVICH and/or LACSD
18 CUSTODIAL DEFENDANTS, failed to implement and maintain proper policies, procedures,
19 practices, and/or protocols to engage mentally incapacitated individuals, including Stanley Wilson,
20 Jr., and provide these individuals with their constitutionally-protected right to adequate and
21 necessary medical care and treatment to treat their mental and medical conditions and/or to
22 provide them with reasonable, safe, and just conditions of confinement. As such, COUNTY
23 ENTITY DEFENDANTS, by and through DIRECTOR BELAVICH and/or LACSD
24 CUSTODIAL DEFENDANTS, were the moving force behind the constitutional violations that
25 Stanley Wilson, Jr. was forced to endure while in COUNTY ENTITY DEFENDANTS' custody.

26 53. Based on information and belief, PLAINTIFFS allege that the wrongful conduct
27 alleged herein was ratified, acquiesced, and/or authorized by COUNTY ENTITY DEFENDANTS,
28 by and through DIRECTOR BELAVICH and/or LACSD CUSTODIAL DEFENDANTS, and

1 other COUNTY ENTITY DEFENDANTS' officers, directors and/or managing agents, including
2 when DIRECTOR BELAVICH and/or LACSD CUSTODIAL DEFENDANTS performed,
3 contributed to, authorized, and/or ratified the above-described acts by establishing and
4 promulgating policies, procedures, and/or practices that carelessly, negligently, improperly,
5 recklessly, wantonly, and/or illegally failed to provide reasonably necessary care and/or failed to
6 provide reasonable, safe, and just conditions of confinement to Stanley Wilson, Jr. while he was in
7 COUNTY ENTITY DEFENDANTS' custody prior to his February 1, 2023 death.

8 54. Based on information and belief, PLAINTIFFS allege that COUNTY ENTITY
9 DEFENDANTS, by and through DIRECTOR BELAVICH and/or LACSD CUSTODIAL
10 DEFENDANTS, and other respective officers, directors and/or managing agents, negligently,
11 recklessly, and callously failed to implement policies, procedures, practices, and/or protocols to
12 ensure the safety of mentally incapacitated individuals known to be suffering from emergency
13 medical conditions in their custody, including Stanley Wilson, Jr, and to ensure those individuals
14 are provided with reasonable and just conditions of confinement.

15 55. Based on information and belief, PLAINTIFFS allege that COUNTY ENTITY
16 DEFENDANTS, by and through DIRECTOR BELAVICH and/or LACSD CUSTODIAL
17 DEFENDANTS, and other respective officers, directors, and/or managing agents, negligently,
18 recklessly, and callously failed to train their employees, agents, independent contractors, and/or
19 joint venturers, including COUNTY DHS DEFENDANTS and/or LACSD CUSTODIAL
20 DEFENDANTS, to reasonably ensure that mentally incapacitated individuals in COUNTY
21 ENTITY DEFENDANTS' custody, like Stanley Wilson, Jr., receive reasonably necessary medical
22 attention, are not deprived from receiving such care, including in contravention of court orders,
23 and/or are not deprived of reasonable, safe, and just conditions of confinement, all of which
24 amount to cruel and unusual punishment.

25 56. As a direct and proximate cause of the tortious conduct and/or omissions of
26 COUNTY DHS DEFENDANTS, including DIRECTOR BELAVICH, and LACSD CUSTODIAL
27 DEFENDANTS, Stanley Wilson, Jr. suffered an untimely and wrongful death on February 1,
28 2023.

1 57. As a direct and proximate cause of the tortious acts and /or omissions described
2 herein, Plaintiffs D. PULANE LUCAS and STANLEY WILSON, SR., parents of Stanely Wilson,
3 Jr., have suffered and continue to suffer, without limitation, the loss of DECEDENT's love,
4 companionship, comfort, care, assistance, protection, affection, society, moral support, training,
5 and guidance.

6 58. As a direct and proximate cause of COUNTY DHS DEFENDANTS' tortious acts
7 and/or omissions described herein, Plaintiffs D. PULANE LUCAS and STANLEY WILSON, SR.,
8 parents of Stanely Wilson, Jr., have suffered wrongful death damages that include, without
9 limitation, economic losses associated with (1) the loss of financial support that DECEDENT
10 would have contributed to the family during the life expectancy that DECEDENT had before his
11 death or the life expectancy of PLAINTIFFS, (2) the loss of gifts or benefits that PLAINTIFFS
12 would have expected to receive from DECEDENT, (3) funeral and burial expenses, and (4) the
13 reasonable value of household services that DECEDENT would have provided.

14 59. As a result of the tortious acts and omissions described herein, the ESTATE claims
15 compensable pre-death pain and suffering of Stanley Wilson, Jr.

16 **FIRST CAUSE OF ACTION FOR BANE CIVIL RIGHTS VIOLATIONS**

17 **(Bane Act Violations against COUNTY DHS DEFENDANTS, DIRECTOR BELAVICH,**
18 **LACSD CUSTODIAL DEFENDANTS, and DOE DEFENDANTS)**

19 60. PLAINTIFFS incorporate herein by reference, each and every allegation and
20 statement contained hereinabove as if the same had been set forth fully below.

21 **Deprivation of Stanley Wilson, Jr.'s Right to Medical Care by COUNTY ENTITY**
22 **DEFENDANTS, by and through COUNTY DHS DEFENDANTS and/or DIRECTOR**

23 **BELAVICH:**

24 61. Without limitation, the 14th Amendment civil rights of Stanley Wilson, Jr. were
25 violated by COUNTY DHS DEFENDANTS and/or DIRECTOR BELAVICH when they
26 intentionally interfered with Stanley Wilson, Jr.'s rights as a pre-trial detainee, specifically by
27 denying him needed and court-ordered medical care. The denial of medical care by COUNTY
28 DHS DEFENDANTS and/or DIRECTOR BELAVICH, as alleged herein, was done under

1 conditions of intimidation and coercion, including during a time when Stanley Wilson, Jr. was in
2 the custody and/or carceral environment at COUNTY ENTITY DEFENDANTS' Twin Towers
3 Correctional Facility. At all relevant times, Stanley Wilson, Jr. reasonably believed COUNTY
4 DSH DEFENDANTS and/or DIRECTOR BELAVICH would retaliate against him with threats,
5 intimidation, and/or otherwise coercion withing the carceral environment should he had attempted
6 to exercise his constitutional right to medical care.

7 62. Based on information and belief, on or about November 7, 2022, the Court ordered
8 that Stanley Wilson, Jr. be committed to California Department of State Hospitals' Metropolitan
9 State Hospital no later than December 5, 2022.

10 63. Based on information and belief, following the November 7, 2022 Court Order,
11 COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS,
12 DIRECTOR BELAVICH, and/or LACSD CUSTODIAL DEFENDANTS, were on notice of the
13 following related to Stanley Wilson, Jr.:

- 14 • Stanley Wilson, Jr. had documented serious and deteriorating health issues that
15 required immediate mental health attention, treatment, and further assessment and/or
16 evaluation.
- 17 • Stanley Wilson, Jr. was presenting with, without limitation, psychotic symptoms and
18 endorsing with perceptual disturbances and delusional disorder that required
19 stabilization and observation and was to be scheduled for care transition for release
20 planning.
- 21 • Stanley Wilson, Jr. was repeatedly documented as having serious and deteriorating
22 health issues requiring medical attention.
- 23 • Stanley Wilson, Jr. had been found incompetent to stand trial and lacked the capacity
24 to make decisions regarding his medical treatment while in custody.
- 25 • Stanley Wilson, Jr.'s psychiatric condition required treatment with psychotropic
26 medications to be prescribed by treating psychiatrists.
- 27 • Stanley Wilson, Jr. was recommended to receive competency training in a forensic
28 setting approved by the California Department of State Hospitals.

- On November 7, 2022, the Court ordered that Stanley Wilson, Jr. be committed to California Department of State Hospitals 'Metropolitan State Hospital for treatment by December 5, 2022.

64. Based on information and belief, following the issuance of the November 7, 2022 court order, COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS and/or DIRECTOR BELAVICH, who, at all relevant times, had the authority and ability to transport Stanley Wilson, Jr. to Metropolitan State Hospital no later than December 5, 2022, had a duty to comply with said order, specifically to timely provide Stanley Wilson, Jr. with needed medical care at Metropolitan State Hospital. Despite the duty to comply with the November 7, 2022 order, COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS and/or DIRECTOR BELAVICH, intentionally, recklessly, and/or in conscious disregard of Stanley Wilson, Jr.'s right to medical care violated said order by failing to reasonably and timely provide Stanley Wilson, Jr. with needed and immediate medical care by December 5, 2022 at the Metropolitan State Hospital.

65. Based on information and belief, at all time while in their custody, COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS and/or DIRECTOR BELAVICH, had a duty to, without limitation, provide Stanley Wilson, Jr. with needed medical and mental health care which included, without limitation, the following: (1) to provide reasonable and necessary medical and/or mental health care during the entirety of Stanley Wilson, Jr.'s care while he was held in custody at Twin Towers, including to properly, reasonably, and/or safely treat and stabilize his known deteriorating serious health condition, including by providing him care in a hospital setting, as required pursuant to the Court Order, during a time in which his physical and mental health was deteriorating; (2) to safely and properly prescribe, administer, monitor, and/or supervise Stanley Wilson, Jr.'s medication regimen - instead, based upon information and belief, the aforementioned defendants negligently administered a combination of medications that unreasonably increased the likelihood of developing severe physical conditions known to result in pulmonary embolisms, including when in custody at Twin Towers and/or in restraints, and failed to properly monitor and supervise Stanley Wilson, Jr. to prevent the development of fatal side effects

1 stemming from the unreasonably heightened risks associated with said medications and the carceral
2 environment; (3) to safely and properly adjust Stanley Wilson Jr.'s daily routine and carceral
3 environment including, without limitation, day-to-day activities required for his physical and/or
4 mental health while in custody at the Twin Towers Correctional Facility so as to reasonably prevent
5 the development of pulmonary embolisms and/or to reasonably minimize the increased likelihood
6 of developing a pulmonary embolism or other fatal condition; and/or (4) to provide timely,
7 reasonably, and/or adequate monitoring, supervision, screenings, examinations, and/or otherwise
8 tests so as to have timely detected the clear and known symptoms of his deteriorating physical
9 condition, including related to the heightened risk of developing pulmonary embolisms and/or other
10 fatal physical conditions, which, based upon information and belief, were known and/or should
11 have been known to cause serious physical injury to and/or death.

12 66. Despite the duty to timely comply with the November 7, 2022 order, COUNTY
13 ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS and/or DIRECTOR
14 BELAVICH, intentionally, recklessly, and/or in conscious disregard of Stanley Wilson, Jr.'s
15 constitutional right to medical care, violated said order by failing to reasonably and timely provide
16 Stanley Wilson, Jr. with needed medical care at Metropolitan State Hospital. Specifically,
17 COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS,
18 affirmatively did not, without limitation, provide reasonable and necessary medical and/or mental
19 health care during the entirety of Stanley Wilson, Jr.'s care while he was held in custody at Twin
20 Towers, including to properly, reasonably, and/or safely treat and stabilize his known deteriorating
21 serious health issues in a hospital setting as required pursuant to the Court Order during a time in
22 which he required immediate medical/mental health attention, treatment, assessment and/or
23 evaluation.

24 67. For 59 days while Stanley Wilson, Jr. was a pre-trial detainee – from the November
25 7, 2022 court order that Stanley Wilson, Jr. receive treatment at California Department of State
26 Hospitals' Metropolitan State Hospital to the date of his February 1, 2023 death – COUNTY
27 ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS and DIRECTOR
28 BELAVICH, jointly and severally denied Stanley Wilson, Jr. both the court-ordered and medically

1 necessary health care that constitute substantial factors that caused injury and/or death to Stanley
2 Wilson, Jr and also constitute constitutional violations related to Stanley Wilson's conditions of
3 confinement and denial of needed medical care as a pre-trial detainee.

4 68. Without limitation, the civil rights of Stanley Wilson, Jr. were also violated by
5 COUNTY DHS DEFENDANTS and/or DIRECTOR BELAVICH when they intentionally,
6 recklessly, and/or in conscious disregard failed to provide him with needed medical care under
7 threats, intimidation, and/or otherwise coercion in the carceral environment. At all relevant times,
8 based on information and belief, Stanley Wilson, Jr. reasonably believed that COUNTY DHS
9 and/or DIRECTOR BELAVICH had the ability to carry out such threats and would do so if he
10 attempted to exercise his constitutional right to medical care while at the LACSD's Twin Towers
11 Correctional Facility.

12 69. The aforementioned conduct by COUNTY DHS DEFENDANTS and/or
13 DIRECTOR BELAVICH ultimately resulted in, and was a substantial factor in causing Stanley
14 Wilson, Jr.'s death on February 1, 2023.

15 70. Without limitation, the threats, intimidation, and/or otherwise coercion used against
16 Stanley Wilson, Jr. in the carceral environment by COUNTY DHS DEFENDANTS and/or
17 DIRECTOR BELAVICH while at LACSD's Twin Towers Correctional Facility prevented Stanley
18 Wilson, Jr. from exercising his right to medical care, including out of fear of retaliation from
19 COUNTY DHS DEFENDANTS and/or DIRECTOR BELAVICH.

20 71. Instead of receiving timely, reasonable, and adequate medical treatment for his
21 mental health disorder and known physical health throughout his time at Twin Towers, including
22 between November 7, 2022 through February 1, 2023 when Stanley Wilson, Jr.'s health was
23 deteriorating, COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS
24 DEFENDANTS and DIRECTOR BELAVICH, deprived Stanley Wilson, Jr. of necessary and
25 immediate medical care and/or treatment necessary to treat his emergency medical condition at the
26 Metropolitan State Hospital in direct violation of the duties owed to Stanley Wilson, Jr. as a pre-
27 trial detainee, and as required by the November 7, 2022 Court Order. Rather, as a result of
28 COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS, deprivation

1 of necessary and immediate medical care, Stanley Wilson, Jr. succumbed to the severity of his
2 deteriorating health on February 1, 2023, at or about 10:27 a.m.

3 72. As a direct and proximate cause of the tortious conduct and/or omissions of
4 COUNTY DHS DEFENDANTS, including DIRECTOR BELAVICH, and LACSD CUSTODIAL
5 DEFENDANTS, Stanley Wilson, Jr. suffered an untimely and wrongful death on February 1,
6 2023.

7 73. As a direct and proximate cause of the tortious acts and /or omissions described
8 herein, Plaintiffs D. PULANE LUCAS and STANLEY WILSON, SR., parents of Stanely Wilson,
9 Jr., have suffered and continue to suffer, without limitation, the loss of DECEDENT's love,
10 companionship, comfort, care, assistance, protection, affection, society, moral support, training,
11 and guidance.

12 74. As a direct and proximate cause of COUNTY DHS DEFENDANTS' tortious acts
13 and/or omissions described herein, Plaintiffs D. PULANE LUCAS and STANLEY WILSON, SR.,
14 parents of Stanely Wilson, Jr., have suffered wrongful death damages that include, without
15 limitation, economic losses associated with (1) the loss of financial support that DECEDENT
16 would have contributed to the family during the life expectancy that DECEDENT had before his
17 death or the life expectancy of PLAINTIFFS, (2) the loss of gifts or benefits that PLAINTIFFS
18 would have expected to receive from DECEDENT, (3) funeral and burial expenses, and (4) the
19 reasonable value of household services that DECEDENT would have provided.

20 75. As a result of the tortious acts and omissions described herein, the ESTATE claims
21 compensable pre-death pain and suffering of Stanley Wilson, Jr.

22 76. As a result of the tortious actions and omissions as described herein, THE ESTATE
23 is entitled to punitive damages because COUNTY DHS DEFENDANTS and/or DIRECTOR
24 BELAVICH acted with the intent to cause injury and/or their conduct was done with a conscious
25 disregard of the rights and/or safety of DECEDENT. At all relevant times, COUNTY DHS
26 DEFENDANTS and/or DIRECTOR BELAVICH were aware of the probable consequences of
27 their conduct and deliberately failed to avoid those consequences.
28

1 77. As a result of COUNTY DHS DEFENDANTS' and/or DIRECTOR BELAVICH's
2 acts as alleged herein, THE ESTATE is entitled to reasonable attorneys' fees and costs of said suit
3 and a civil penalty of \$25,000.00 as provided in Cal. *Civil Code* § 52. Furthermore, as a result
4 COUNTY DHS DEFENDANTS' and/or DIRECTOR BELAVICH's wrongful and illegal conduct
5 as alleged herein, THE ESTATE, without limitation, is also entitled to treble their actual damages,
6 which in no case shall be less than \$4,000.00.

7 **Violation of Stanley Wilson, Jr.'s 14th Amendment Right to Be Free of Unreasonable, Unsafe,**
8 **and Unjust Conditions of Confinement by CUSTODY ENTITY DEFENDANTS, by and**
9 **through LACSD CUSTODIAL DEFENDANTS.**

10 78. Furthermore, without limitation, the 14th Amendment civil rights of Stanley Wilson,
11 Jr. were violated by LACSD CUSTODIAL DEFENDANTS when they intentionally, recklessly,
12 and/or otherwise in conscious disregard interfered with Stanley Wilson, Jr.'s rights as a pre-trial
13 detainee, specifically by subjecting him to unreasonable, unsafe, and unjust conditions of
14 confinement. These unjust and unreasonable conditions of confinement include, without
15 limitation:

- 16 • insufficient out-of-cell time and physical activity, which lead to and/or contribute to
17 physical deterioration and susceptibility to developing deep vein thrombosis and/or
18 increased risks of suffering and dying from pulmonary embolisms and/or lead to and/or
19 contribute to mental and emotional deterioration, especially for individuals, like Stanley
20 Wilson, Jr., who require mental health stabilization, care, and attention;
- 21 • unwanted levels of isolation, which lead to and/or contributed to physical deterioration
22 and/or to mental and emotional deterioration, especially for individuals, like Stanley
23 Wilson, Jr., who require mental health stabilization, care, and attention
- 24 • uninhabitable and unsafe sanitary conditions, such as malfunctioning plumbing, insufficient
25 ventilation, and/or vermin and insect infestations, which lead to and/or contribute to
26 physical, mental, and emotional deterioration, especially for individuals, like Stanley
27 Wilson, Jr., who require physical and mental health stabilization, care, and attention;
- 28 • debilitating conditions, such as inadequate air conditioning systems, lack of ventilation, and

- 1 lack of appropriate clothing for incarcerated persons, which lead to and/or contribute to
2 physical, mental, and emotional deterioration, especially for individuals, like Stanley
3 Wilson, Jr., who require physical and mental health stabilization, care, and attention;
- 4 • deprivation of basic hygienic supplies and/or products, such as lack of regular showers,
5 personal hygiene products, laundry services, clean clothing, and bedding, which lead to
6 and/or contribute to physical, mental, and emotional deterioration, especially for
7 individuals, like Stanley Wilson, Jr., who require physical and mental health stabilization,
8 care, and attention;
 - 9 • inappropriate and/or inedible food products, including food diets in contravention of known
10 medical conditions, which lead to and/or contribute to physical, mental, and emotional
11 deterioration, especially for individuals, like Stanley Wilson, Jr., who require physical and
12 mental health stabilization, care, and attention; and/or
 - 13 • the negligent administration of medical regimens and food diets in contravention of known
14 medical conditions, which lead to and/or contribute to physical, mental, and emotional
15 deterioration, especially for individuals, like Stanley Wilson, Jr., who require physical and
16 mental health stabilization, care, and attention and/or lead to and/or contribute to physical
17 deterioration and susceptibility to developing deep vein thrombosis and/or increased risks of
18 suffering and dying from pulmonary embolisms.

19 79. As a result of COUNTY ENTITY DEFENDANTS', by and through LACSD
20 CUSTODIAL DEFENDANTS, provision of said unreasonable, unsafe, and unjust conditions of
21 confinement caused Stanley Wilson, Jr.'s physical, mental, and emotional condition continued to
22 deteriorate during his incarceration at Twin Towers, which precipitated his death on February 1,
23 2023, at or about 10:27 a.m.

24 80. Based on information and belief, on or about November 7, 2022, the Court ordered
25 that Stanley Wilson, Jr. be committed to California Department of State Hospitals' Metropolitan
26 State Hospital no later than December 5, 2022.

27 81. Based on information and belief, following the issuance of the November 7, 2022
28 Court Order, COUNTY ENTITY DEFENDANTS, by and through LACSD CUSTODIAL

1 DEFENDANTS, had a duty to comply with said order, specifically to provide Stanley Wilson, Jr.
2 with reasonable and just conditions of confinement by timely activating, engaging, and/or
3 otherwise triggering the logistical management and operational control of Stanley Wilson, Jr., so
4 as to transport him to the Metropolitan State Hospital. Despite this duty to timely comply with the
5 November 7, 2022 Court Order, COUNTY ENTITY DEFENDANTS, by and through LACSD
6 CUSTODIAL DEFENDANTS, intentionally, recklessly, and/or in conscious disregard of Stanley
7 Wilson, Jr.'s constitutional rights to reasonable and just conditions of confinement violated said
8 order by keeping him at Twin Towers and depriving him of transportation to Metropolitan State
9 Hospital. These decisions, actions, and/or omissions further constituted unreasonable, unsafe, and
10 unjust conditions of confinement of Stanley Wilson, Jr., including in contravention of the
11 December 5, 2022 deadline ordered by the November 7, 2022 Court Order.

12 Despite the duty to timely comply with the November 7, 2022 Court Order, COUNTY ENTITY
13 DEFENDANTS, by and through LACSD CUSTODIAL DEFENDANTS, intentionally, recklessly,
14 and/or in conscious disregard of Stanley Wilson, Jr.'s constitutional right to be free from unjust and
15 unreasonable conditions of confinement, violated said order by failing to provide Stanley Wilson,
16 Jr. with reasonable, safe, and just conditions of confinement. Moreover, based on information and
17 belief, Stanley Wilson, Jr. was subjected to unlawful and unwarranted threats, intimidation, and/or
18 otherwise coercion at the hands of the LACSD CUSTODIAL DEFENDANTS. LACSD
19 CUSTODIAL DEFENDANTS' threats, intimidation, and/or otherwise coercion caused Stanley
20 Wilson, Jr. to reasonably believe that if he exercised his right to medical care, then COUNTY DHS
21 DEFENDANTS would commit violence against him and had the apparent ability to do so.

22 Moreover, based on the foregoing, LACSD CUSTODIAL DEFENDANTS' leadership acquiesced,
23 authorized, and/or otherwise ratified LACSD CUSTODIAL DEFENDANTS' threats, intimidations,
24 and/or otherwise coercion as to Stanley Wilson, Jr., as alleged herein. Said unlawful and
25 unwarranted threats, intimidation, and/or otherwise coercion at the hands of the LACSD
26 CUSTODIAL DEFENDANTS constitute violations of Stanley Wilson, Jr.'s constitutional rights.

27 82. For 59 days while Stanley Wilson, Jr. was a pre-trial detainee – from the November
28 7, 2022 Court Order's deadline that Stanley Wilson, Jr. receive treatment at the Metropolitan State

1 Hospital to the date of his February 1, 2023 death – COUNTY ENTITY DEFENDANTS, by and
2 through LACSD CUSTODIAL DEFENDANTS, jointly and severally violated the November 7,
3 2022 Court Order by failing to activate, engage, and/or otherwise trigger the logistical
4 management and/or operational control of Stanley Wilson, Jr. so that he could be timely
5 transported to the Metropolitan State Hospital by December 5, 2022 in compliance with the
6 November 7, 2022 Court Order. Plaintiffs allege that the aforementioned violations related to the
7 November 7, 2022 Order by COUNTY ENTITY DEFENDANTS, by and through LACSD
8 CUSTODIAL DEFENDANTS, constituted a substantial factor that caused injury and/or death to
9 Stanley Wilson, Jr.

10 83. Without limitation, the civil rights of Stanley Wilson, Jr. were also violated by
11 LACSD CUSTODIAL DEFENDANTS when they intentionally, recklessly, and/or in conscious
12 disregard interfered with Stanley Wilson, Jr.’s rights, including as a pre-trial detainee, to be free
13 of unjust and unreasonable conditions of confinement by subjecting him to threats, intimidation,
14 and/or otherwise coercion of retaliation that Stanley Wilson, Jr. reasonably believed would occur if
15 he attempted to exercise his right to be free from unjust and unreasonable conditions of
16 confinement while at the LACSD’s Twin Towers Correctional Facility and/or California
17 Department of State Hospitals’ Metropolitan State Hospital. These threats, intimidation, and/or
18 coercion by LACSD CUSTODIAL DEFENDANTS were done intentionally, recklessly, and/or in
19 conscious disregard despite LACSD CUSTODIAL DEFENDANTS’ knowing Stanley Wilson, Jr.
20 to be mentally incompetent to stand trial and known to be diagnosed with mental health disorders
21 that required release from confinement at Twin Towers and transportation to Metropolitan State
22 Hospital as determined by the November 7, 2022 Court Order.

23 84. The decision by COUNTY ENTITY DEFENDANTS, by and through LACSD
24 CUSTODIAL DEFENDANTS, to continue to detain Stanley Wilson, Jr. in the carceral
25 environment at Twin Towers past the Court-imposed December 5, 2023 deadline, instead of
26 releasing him to Metropolitan State Hospital, constitutes egregious constitutional violations of his
27 constitutional rights. These decisions and actions forced Stanley Wilson, Jr. to remain in Twin
28 Towers’ carceral environment – in conscious and reckless disregard for his health and safety –

1 instead of being released from COUNTY ENTITY DEFENDANTS' custody so that he could be
2 administered needed health care in a hospital setting during a time when his physical and mental
3 health was deteriorating and as ordered by the Court. The actions and/or omissions of COUNTY
4 ENTITY DEFENDANTS, by and through LACSD CUSTODIAL DEFENDANTS, to keep
5 Stanley Wilson, Jr. in their custody in contravention of the Court-imposed December 5, 2023
6 deadline – which deprived him of Court-ordered and medical necessary care and attention –
7 constitute proximate causes of Stanley Wilson, Jr.'s death on February 1, 2023.

8 85. The denial of just and reasonable conditions of confinement by LACSD
9 CUSTODIAL DEFENDANTS as alleged herein was done under conditions of intimidation and
10 coercion, including during a time when Stanley Wilson, Jr. was in conditions of confinement and a
11 carceral environment at COUNTY ENTITY DEFENDANTS' Twin Towers Correctional Facility.
12 At all relevant times, Stanley Wilson, Jr. reasonably believed LACSD CUSTODIAL
13 DEFENDANTS would retaliate against him with threats, intimidation, and/or otherwise coercive
14 actions in the carceral environment and that, should he had attempted to exercise his constitutional
15 right to reasonable and just conditions of confinement, such threatened actions would have been
16 committed against him. LACSD CUSTODIAL DEFENDANTS' tortious conduct was done
17 intentionally, consciously, and/or otherwise in reckless disregard of Stanley Wilson Jr.'s
18 constitutional right to be free from unjust and unreasonable conditions of confinement.

19 86. Based on the foregoing, LACSD CUSTODIAL DEFENDANTS' tortious conduct
20 herein caused Stanley Wilson, Jr. injuries and damages, including his untimely death on February 1,
21 2023. The aforementioned conduct by LACSD CUSTODIAL DEFENDANTS ultimately resulted
22 in, and was a substantial factor in causing Stanley Wilson, Jr.'s death on February 1, 2023.

23 87. Based on information and belief, LACSD CUSTODIAL DEFENDANTS, intended
24 to deprive Stanley Wilson, Jr. of his enjoyment of the interests protected by the right, as a pre-trial
25 detainee, to be free from unjust and unreasonable conditions of confinement, and all cognizable
26 interests under the Due Process Clause of the Fifth and Fourteenth Amendments of the United
27 States Constitution and related California constitutional interests to be free from state actions that
28 deprive individuals of recognized constitutional rights and liberties

1 exercise reasonable care in activities from which harm might reasonably be anticipated. At all
2 relevant times, Stanley Wilson, Jr. was in the custody and control of COUNTY ENTITY
3 DEFENDANTS, including COUNTY DHS DEFENDANTS, DIRECTOR BELAVICH, and/or
4 LACSD CUSTODIAL DEFENDANTS, who jointly and individually had a duty to exercise
5 reasonable care towards him as a mentally incapacitated inmate, including to provide him with
6 reasonable medical care, follow court order related to the provision of medical care at the
7 Metropolitan State Hospital, and/or to provide him with reasonably safe conditions of confinement.

8 **Negligence as to COUNTY DHS DEFENDANTS and/or DIRECTOR BELAVICH:**

9 95. Based on information and belief, on or about November 7, 2022, the Court ordered
10 that Stanley Wilson, Jr. be committed to California Department of State Hospitals' Metropolitan
11 State Hospital no later than December 5, 2022.

12 96. Based on information and belief, following the November 7, 2022 Court Order,
13 COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS,
14 DIRECTOR BELAVICH, and/or LACSD CUSTODIAL DEFENDANTS, were on notice of the
15 following related to Stanley Wilson, Jr.:

- 16 • Stanley Wilson, Jr. had documented serious and deteriorating health issues that
17 required immediate mental health attention, treatment, and further assessment and/or
18 evaluation.
- 19 • Stanley Wilson, Jr. was presenting with, without limitation, psychotic symptoms and
20 endorsing with perceptual disturbances and delusional disorder that required
21 stabilization and observation and was to be scheduled for care transition for release
22 planning.
- 23 • Stanley Wilson, Jr. was repeatedly documented as having serious and deteriorating
24 health issues requiring medical attention.
- 25 • Stanley Wilson, Jr. had been found incompetent to stand trial and lacked the capacity
26 to make decisions regarding his medical treatment while in custody.
- 27 • Stanley Wilson, Jr.'s psychiatric condition required treatment with psychotropic
28 medications to be prescribed by treating psychiatrists.

- 1 • Stanley Wilson, Jr. was recommended to receive competency training in a forensic
2 setting approved by the California Department of State Hospitals.
- 3 • On November 7, 2022, the Court ordered that Stanley Wilson, Jr. be committed to
4 California Department of State Hospitals 'Metropolitan State Hospital for treatment
5 by December 5, 2022.

6 97. Based on information and belief, following the issuance of the November 7, 2022
7 court order, COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS
8 and/or DIRECTOR BELAVICH, who, at all relevant times, had the authority and ability to
9 transport Stanley Wilson, Jr. to Metropolitan State Hospital no later than December 5, 2022, had a
10 duty to comply with said order, specifically to timely provide Stanley Wilson, Jr. with needed
11 medical care at Metropolitan State Hospital. Despite the duty to comply with the November 7,
12 2022 order, COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS
13 and/or DIRECTOR BELAVICH, negligently breached their duty to provide Wilson, Jr. with said
14 medical care in violation of said order by failing to reasonably and timely provide Stanley Wilson,
15 Jr. with needed and immediate medical care by December 5, 2022 at the Metropolitan State
16 Hospital.

17 98. Based on information and belief, at all time while in their custody, COUNTY
18 ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS and/or DIRECTOR
19 BELAVICH, had a duty to, without limitation, provide Stanley Wilson, Jr. with needed medical and
20 mental health care which included, without limitation, the following: (1) to provide reasonable and
21 necessary medical and/or mental health care during the entirety of Stanley Wilson, Jr.'s care while
22 he was held in custody at Twin Towers, including to properly, reasonably, and/or safely treat and
23 stabilize his known deteriorating serious health condition, including by providing him care in a
24 hospital setting, as required pursuant to the Court Order, during a time in which his physical and
25 mental health was deteriorating; (2) to safely and properly prescribe, administer, monitor, and/or
26 supervise Stanley Wilson, Jr.'s medication regimen - instead, based upon information and belief,
27 the aforementioned defendants negligently administered a combination of medications that
28 unreasonably increased the likelihood of developing severe physical conditions known to result in

1 pulmonary embolisms, including when in custody at Twin Towers and/or in restraints, and failed to
2 properly monitor and supervise Stanley Wilson, Jr. to prevent the development of fatal side effects
3 stemming from the unreasonably heightened risks associated with said medications and the carceral
4 environment; (3) to safely and properly adjust Stanley Wilson Jr.'s daily routine and carceral
5 environment including, without limitation, day-to-day activities required for his physical and/or
6 mental health while in custody at the Twin Towers Correctional Facility so as to reasonably prevent
7 the development of pulmonary embolisms and/or to reasonably minimize the increased likelihood
8 of developing a pulmonary embolism or other fatal condition; and/or (4) to provide timely,
9 reasonably, and/or adequate monitoring, supervision, screenings, examinations, and/or otherwise
10 tests so as to have timely detected the clear and known symptoms of his deteriorating physical
11 condition, including related to the heightened risk of developing pulmonary embolisms and/or other
12 fatal physical conditions, which, based upon information and belief, were known and/or should
13 have been known to cause serious physical injury to and/or death.

14 99. Despite the duty to timely comply with the November 7, 2022 order, COUNTY
15 ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS and/or DIRECTOR
16 BELAVICH, negligently failed to provide Stanley Wilson, Jr. with said medical care and, as such,
17 breached their duties by failing to reasonably and timely provide Stanley Wilson, Jr. with needed
18 medical care at Metropolitan State Hospital. Specifically, COUNTY ENTITY DEFENDANTS, by
19 and through COUNTY DHS DEFENDANTS, affirmatively did not, without limitation, provide
20 reasonable and necessary medical and/or mental health care during the entirety of Stanley Wilson,
21 Jr.'s care while he was held in custody at Twin Towers, including to properly, reasonably, and/or
22 safely treat and stabilize his known deteriorating serious health issues in a hospital setting as
23 required pursuant to the Court Order during a time in which he required immediate medical/mental
24 health attention, treatment, assessment and/or evaluation.

25 100. As a further breach, for 59 days while Stanley Wilson, Jr. was a pre-trial detainee –
26 from the November 7, 2022 court order that Stanley Wilson, Jr. receive treatment at California
27 Department of State Hospitals' Metropolitan State Hospital to the date of his February 1, 2023
28 death – COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS DEFENDANTS

1 and DIRECTOR BELAVICH, jointly and severally denied Stanley Wilson, Jr. both the court-
2 ordered and medically necessary health care that constitute substantial factors that caused injury
3 and/or death to Stanley Wilson, Jr and also constitute constitutional violations related to Stanley
4 Wilson's conditions of confinement and denial of needed medical care as a pre-trial detainee.

5 101. The aforementioned conduct by COUNTY DHS DEFENDANTS and/or
6 DIRECTOR BELAVICH ultimately resulted in, and was a substantial factor in causing Stanley
7 Wilson, Jr.'s death on February 1, 2023.

8 102. Instead of receiving timely, reasonable, and adequate medical treatment for his
9 mental health disorder and known physical health throughout his time at Twin Towers, including
10 between November 7, 2022 through February 1, 2023 when Stanley Wilson, Jr.'s health was
11 deteriorating, COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS
12 DEFENDANTS and DIRECTOR BELAVICH, negligently deprived Stanley Wilson, Jr. of
13 necessary and immediate medical care and/or treatment necessary to treat his emergency medical
14 condition at the Metropolitan State Hospital in direct violation of the duties owed to Stanley
15 Wilson, Jr. as a pre-trial detainee, and as required by the November 7, 2022 Court Order. Rather,
16 as a result of COUNTY ENTITY DEFENDANTS, by and through COUNTY DHS
17 DEFENDANTS, deprivation of necessary and immediate medical care, Stanley Wilson, Jr.
18 succumbed to the severity of his deteriorating health on February 1, 2023, at or about 10:27 a.m.

19 103. As a direct and proximate cause of the tortious conduct and/or omissions of
20 COUNTY DHS DEFENDANTS, including DIRECTOR BELAVICH, and LACSD CUSTODIAL
21 DEFENDANTS, Stanley Wilson, Jr. suffered an untimely and wrongful death on February 1,
22 2023.

23 104. As a direct and proximate cause of the tortious acts and /or omissions described
24 herein, Plaintiffs D. PULANE LUCAS and STANLEY WILSON, SR., parents of Stanley Wilson,
25 Jr., have suffered and continue to suffer, without limitation, the loss of DECEDENT's love,
26 companionship, comfort, care, assistance, protection, affection, society, moral support, training,
27 and guidance.

28 105. As a direct and proximate cause of COUNTY DHS DEFENDANTS' tortious acts

1 and/or omissions described herein, Plaintiffs D. PULANE LUCAS and STANLEY WILSON, SR.,
2 parents of Stanely Wilson, Jr., have suffered wrongful death damages that include, without
3 limitation, economic losses associated with (1) the loss of financial support that DECEDENT
4 would have contributed to the family during the life expectancy that DECEDENT had before his
5 death or the life expectancy of PLAINTIFFS, (2) the loss of gifts or benefits that PLAINTIFFS
6 would have expected to receive from DECEDENT, (3) funeral and burial expenses, and (4) the
7 reasonable value of household services that DECEDENT would have provided.

8 106. As a result of the tortious acts and omissions described herein, the ESTATE claims
9 compensable pre-death pain and suffering of Stanley Wilson, Jr.

10 107. As a result of the tortious actions and omissions as described herein, THE ESTATE
11 is entitled to punitive damages because COUNTY DHS DEFENDANTS and/or DIRECTOR
12 BELAVICH acted with the intent to cause injury and/or their conduct was done with a conscious
13 disregard of the rights and/or safety of DECEDENT. At all relevant times, COUNTY DHS
14 DEFENDANTS and/or DIRECTOR BELAVICH were aware of the probable consequences of
15 their conduct and deliberately failed to avoid those consequences.

16 **Negligence as to CUSTODY ENTITY DEFENDANTS, by and through LACSD CUSTODIAL**
17 **DEFENDANTS.**

18 108. Furthermore, COUNTY ENTITY DEFENDANTS, by and through the actions of
19 LACSD CUSTODIAL DEFENDANTS also breached their duty to provide Stanley Wilson, Jr.
20 with reasonably safe conditions of confinement when they negligently subjecting him to
21 unreasonable, unsafe, and unjust conditions of confinement. These unjust and unreasonable
22 conditions of confinement include, without limitation:

- 23 • insufficient out-of-cell time and physical activity, which lead to and/or contribute to
24 physical deterioration and susceptibility to developing deep vein thrombosis and/or
25 increased risks of suffering and dying from pulmonary embolisms and/or lead to and/or
26 contribute to mental and emotional deterioration, especially for individuals, like Stanley
27 Wilson, Jr., who require mental health stabilization, care, and attention;
- 28 • unwanted levels of isolation, which lead to and/or contributed to physical deterioration

1 and/or to mental and emotional deterioration, especially for individuals, like Stanley
2 Wilson, Jr., who require mental health stabilization, care, and attention

- 3 • uninhabitable and unsafe sanitary conditions, such as malfunctioning plumbing, insufficient
4 ventilation, and/or vermin and insect infestations, which lead to and/or contribute to
5 physical, mental, and emotional deterioration, especially for individuals, like Stanley
6 Wilson, Jr., who require physical and mental health stabilization, care, and attention;
- 7 • debilitating conditions, such as inadequate air conditioning systems, lack of ventilation, and
8 lack of appropriate clothing for incarcerated persons, which lead to and/or contribute to
9 physical, mental, and emotional deterioration, especially for individuals, like Stanley
10 Wilson, Jr., who require physical and mental health stabilization, care, and attention;
- 11 • deprivation of basic hygienic supplies and/or products, such as lack of regular showers,
12 personal hygiene products, laundry services, clean clothing, and bedding, which lead to
13 and/or contribute to physical, mental, and emotional deterioration, especially for
14 individuals, like Stanley Wilson, Jr., who require physical and mental health stabilization,
15 care, and attention;
- 16 • inappropriate and/or inedible food products, including food diets in contravention of known
17 medical conditions, which lead to and/or contribute to physical, mental, and emotional
18 deterioration, especially for individuals, like Stanley Wilson, Jr., who require physical and
19 mental health stabilization, care, and attention; and/or
- 20 • the negligent administration of medical regiments and food diets in contravention of known
21 medical conditions, which lead to and/or contribute to physical, mental, and emotional
22 deterioration, especially for individuals, like Stanley Wilson, Jr., who require physical and
23 mental health stabilization, care, and attention and/or lead to and/or contribute to physical
24 deterioration and susceptibility to developing deep vein thrombosis and/or increased risks of
25 suffering and dying from pulmonary embolisms.

26 109. As a result of COUNTY ENTITY DEFENDANTS', by and through LACSD
27 CUSTODIAL DEFENDANTS, negligent provision of said unreasonable, unsafe, and unjust
28 conditions of confinement caused Stanley Wilson, Jr.'s physical, mental, and emotional condition

1 continued to deteriorate during his incarceration at Twin Towers, which precipitated his death on
2 February 1, 2023, at or about 10:27 a.m.

3 110. Based on information and belief, on or about November 7, 2022, the Court ordered
4 that Stanley Wilson, Jr. be committed to California Department of State Hospitals' Metropolitan
5 State Hospital no later than December 5, 2022.

6 111. Based on information and belief, following the issuance of the November 7, 2022
7 Court Order, COUNTY ENTITY DEFENDANTS, by and through LACSD CUSTODIAL
8 DEFENDANTS, had a duty to comply with said order, specifically to provide Stanley Wilson, Jr.
9 with reasonable and just conditions of confinement by timely activating, engaging, and/or
10 otherwise triggering the logistical management and operational control of Stanley Wilson, Jr., so
11 as to transport him to the Metropolitan State Hospital. Despite this duty to timely comply with the
12 November 7, 2022 Court Order, COUNTY ENTITY DEFENDANTS, by and through LACSD
13 CUSTODIAL DEFENDANTS, negligently disregarded their duty to provide him with reasonable,
14 safe, and just conditions of confinement and instead negligently violated said order by keeping him
15 at Twin Towers and depriving him of transportation to Metropolitan State Hospital. These
16 negligent decisions, actions, and/or omissions further constituted unreasonable, unsafe, and unjust
17 conditions of confinement of Stanley Wilson, Jr., including in contravention of the December 5,
18 2022 deadline ordered by the November 7, 2022 Court Order.

19 112. Despite the duty to timely comply with the November 7, 2022 Court Order,
20 COUNTY ENTITY DEFENDANTS, by and through LACSD CUSTODIAL DEFENDANTS,
21 negligently disregarded Stanley Wilson, Jr.'s constitutional right to be free from unjust and
22 unreasonable conditions of confinement and violated said order by failing to provide Stanley
23 Wilson, Jr. with reasonable, safe, and just conditions of confinement.

24 113. For 59 days while Stanley Wilson, Jr. was a pre-trial detainee – from the November
25 7, 2022 Court Order's deadline that Stanley Wilson, Jr. receive treatment at the Metropolitan State
26 Hospital to the date of his February 1, 2023 death – COUNTY ENTITY DEFENDANTS, by and
27 through LACSD CUSTODIAL DEFENDANTS – jointly and severally violated the November 7,
28 2022 Court Order by negligently failed to activate, engage, and/or otherwise trigger the logistical

1 management and/or operational control of Stanley Wilson, Jr. so that he could be timely
2 transported to the Metropolitan State Hospital by December 5, 2022 in compliance with the
3 November 7, 2022 Court Order. Plaintiffs allege that the aforementioned violations related to the
4 November 7, 2022 Order by COUNTY ENTITY DEFENDANTS, by and through LACSD
5 CUSTODIAL DEFENDANTS, constituted a substantial factor that caused injury and/or death to
6 Stanley Wilson, Jr.

7 114. The decision by COUNTY ENTITY DEFENDANTS, by and through LACSD
8 CUSTODIAL DEFENDANTS, to continue to negligently detain Stanley Wilson, Jr. in the carceral
9 environment at Twin Towers past the Court-imposed December 5, 2023 deadline, instead of
10 releasing him to Metropolitan State Hospital, constitutes egregious constitutional violations of his
11 constitutional rights. These negligent decisions and actions forced Stanley Wilson, Jr. to remain in
12 Twin Towers' carceral environment instead of being released from COUNTY ENTITY
13 DEFENDANTS' custody so that he could be administered needed health care in a hospital setting
14 during a time when his physical and mental health was deteriorating and as ordered by the Court.
15 The actions and/or omissions of COUNTY ENTITY DEFENDANTS, by and through LACSD
16 CUSTODIAL DEFENDANTS, to keep Stanley Wilson, Jr. in their custody in contravention of the
17 Court-imposed December 5, 2023 deadline – which negligently deprived him of Court-ordered and
18 medical necessary care and attention – constitute proximate causes of Stanley Wilson, Jr.'s death
19 on February 1, 2023.

20 115. Based on the foregoing, LACSD CUSTODIAL DEFENDANTS' tortious conduct
21 herein caused Stanley Wilson, Jr. injuries and damages, including his untimely death on February 1,
22 2023. The aforementioned conduct by LACSD CUSTODIAL DEFENDANTS ultimately resulted
23 in, and was a substantial factor in causing Stanley Wilson, Jr.'s death on February 1, 2023.

24 116. Based on information and belief, LACSD CUSTODIAL DEFENDANTS,
25 negligently deprived Stanley Wilson, Jr. of his enjoyment of the interests protected by the right, as a
26 pre-trial detainee, to be free from unjust and unreasonable conditions of confinement, and all
27 cognizable interests under the Due Process Clause of the Fifth and Fourteenth Amendments of the
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1 United States Constitution and related California constitutional interests to be free from state
2 actions that deprive individuals of recognized constitutional rights and liberties

3 117. Based on the foregoing, as a direct and proximate cause of LACSD CUSTODIAL
4 DEFENDANTS' tortious conduct and/or omissions as described herein, Stanley Wilson, Jr.
5 suffered an untimely and wrongful death.

6 118. As a direct and proximate cause of the tortious acts and /or omissions described
7 herein, Plaintiffs D. PULANE LUCAS and STANLEY WILSON, SR., parents of Stanely Wilson,
8 Jr., have suffered and continuous to suffer, without limitation, the loss of DECEDENT's love,
9 companionship, comfort, care, assistance, protection, affection, society, moral support, training,
10 and guidance.

11 119. As a direct and proximate cause of COUNTY ENTITY DEFENDANTS, by and
12 through the actions of LACSD CUSTODIAL DEFENDANTS' tortious acts and/or omissions
13 described herein, Plaintiffs D. PULANE LUCAS and STANLEY WILSON, SR., parents of
14 Stanely Wilson, Jr., have suffered wrongful death damages that include, without limitation,
15 economic losses associated with (1) the loss of financial support that DECEDENT would have
16 contributed to the family during the life expectancy that DECEDENT had before his death or the
17 life expectancy of PLAINTIFFS, (2) the loss of gifts or benefits that PLAINTIFFS would have
18 expected to receive from DECEDENT, (3) funeral and burial expenses, and (4) the reasonable
19 value of household services that DECEDENT would have provided.

20 120. As a result of the tortious acts and omissions described herein, THE ESTATE claims
21 compensable pre-death pain and suffering of Stanley Wilson, Jr.

22 121. As a result of the tortious actions and omissions as described herein, THE ESTATE
23 is entitled to punitive damages because LACSD CUSTODIAL DEFENDANTS acted with the
24 intent to cause injury and/or their conduct was done with a conscious disregard of the rights and/or
25 safety of DECEDENT. At all relevant times, LACSD CUSTODIAL DEFENDANTS were aware
26 of the probable consequences of their conduct and deliberately failed to avoid those consequences.

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1 ENTITY DEFENDANTS' employees at Twin Towers Correctional Facility, including DOE
2 DEFENDANTS, such that (1) pre-trial detainees, like Stanley Wilson, Jr., could be free from unjust
3 and unreasonable conditions of confinement and (2) there would be compliance with court orders,
4 including those requiring transportation of inmates to hospital settings when required.

5 126. COUNTY DHS DEFENDANTS, DIRECTOR, BELAVICH, LACSD CUSTODIAL
6 DEFENDANTS, including DOE DEFENDANTS, and each of them, owed DECEDENT a duty of
7 care to act in a reasonable and ordinary manner so as not to cause Stanley Wilson, Jr. any
8 foreseeable harm.

9 127. Based on information and belief, on or about November 7, 2022, the Court ordered
10 that Stanley Wilson, Jr. be committed to California Department of State Hospitals' Metropolitan
11 State Hospital no later than December 5, 2022.

12 128. Based on information and belief, following the November 7, 2022 Court Order,
13 COUNTY ENTITY DEFENDANTS, by and through DIRECTOR BELAVICH, LACSD
14 CUSTODIAL DEFENDANTS, COUNTY DHS DEFENDANTS and DOE DEFENDANTS, were
15 on notice of the following related to Stanley Wilson, Jr.:

- 16 • Stanley Wilson, Jr. had documented serious and deteriorating health issues that
17 required immediate mental health attention, treatment, and further assessment and/or
18 evaluation.
- 19 • Stanley Wilson, Jr. was presenting with, without limitation, psychotic symptoms and
20 endorsing with perceptual disturbances and delusional disorder that required
21 stabilization and observation and was to be scheduled for care transition for release
22 planning.
- 23 • Stanley Wilson, Jr. was repeatedly documented as having serious and deteriorating
24 health issues requiring medical attention.
- 25 • Stanley Wilson, Jr. had been found incompetent to stand trial and lacked the capacity
26 to make decisions regarding his medical treatment while in custody.
- 27 • Stanley Wilson, Jr.'s psychiatric condition required treatment with psychotropic
28 medications to be prescribed by treating psychiatrists.

- 1 • Stanley Wilson, Jr. was recommended to receive competency training in a forensic
2 setting approved by the California Department of State Hospitals.
- 3 • On November 7, 2022, the Court ordered that Stanley Wilson, Jr. be committed to
4 California Department of State Hospitals 'Metropolitan State Hospital for treatment
5 by December 5, 2022.

6 129. DIRECTOR BELAVICH, LACSD CUSTODIAL DEFENDANTS and/or DOE
7 DEFENDANTS, and each of them, failed to use ordinary and reasonable care to avoid injury to
8 Stanley Wilson, Jr. Such failures include, but are not limited to, DIRECTOR BELAVICH's,
9 LACSD CUSTODIAL DEFENDANTS', and/or DOE DEFENDANTS' failures to adopt adequate
10 standards for its employees, agents, and/or joint venturers who were unfit and/or incompetent to
11 perform the work for which they were hired. Such failure includes DIRECTOR BELAVICH's and
12 DOE DEFENDANTS' failure to reasonably train, supervise, and/or to correct their agents,
13 employees, and/or joint venturers who were negligently failing to perform their job duties,
14 specifically so as to prevent the denial of needed and court-ordered medical care for pre-trial
15 detainees, including for Stanley Wilson, J. Additionally, such failures include LACSD
16 CUSTODIAL DEFENDANTS' and/or DOE DEFENDANTS' failure to reasonably train,
17 supervise, and/or correct their agents, employees, and/or joint venturers who were negligently
18 failing to perform their duties, specifically so as to provide reasonable and just conditions of
19 confinement for pre-trial detainees, including Stanley Wilson, Jr. Such failures further include
20 COUNTY ENTITY DEFENDANTS, DIRECTOR BELAVICH, LACSD CUSTODIAL
21 DEFENDANTS, and DOE DEFENDANTS' failure to properly train and supervise their agents,
22 employees, and/or joint venturers so as to, without limitation, (1) avoid unreasonably and
23 unlawfully threatening, intimidating, and/or otherwise coercing persons suffering from emotional,
24 psychological, and/or psychiatric distress, like Stanley Wilson, Jr., and (2) adequately implement
25 safe and reasonable procedures to individuals suffering from severe emotional, psychological,
26 and/or psychiatric distress, like Stanley Wilson, Jr.

27 130. DIRECTOR BELAVICH and DOE DEFENDANTS, and each of them, further
28 failed to use ordinary and reasonable care to avoid injury to Stanley Wilson, Jr. when they failed to

1 properly supervise their employees to ensure that pre-trial detainees who exhibited mental health
2 disorders and required court-ordered medical care, like Stanley Wilson, Jr., actually timely received
3 such medical care and attention. PLAINTIFFS are informed and believe that in failing to
4 reasonably supervise their employees, agents, and/or joint venturers, COUNTY ENTITY
5 DEFENDANTS, DIRECTOR BELAVICH, and DOE DEFENDANTS ratified their negligent
6 and/or unlawful conduct, including by failing to provide needed and court-ordered medical care, as
7 alleged herein.

8 131. As a direct and proximate cause of DIRECTOR BELAVICH's, LACSD
9 CUSTODIAL DEFENDANTS' and/or DOE DEFENDANTS' tortious conduct and/or omissions
10 as described herein, Stanley Wilson, Jr. suffered an untimely and wrongful death.

11 132. As a direct and proximate cause of the tortious acts and /or omissions described
12 herein, Plaintiffs D. PULANE LUCAS and STANLEY WILSON, SR., parents of Stanley Wilson,
13 Jr., have suffered and continuous to suffer, without limitation, the loss of DECEDENT's love,
14 companionship, comfort, care, assistance, protection, affection, society, moral support, training,
15 and guidance.

16 133. As a direct and proximate cause of COUNTY ENTITY DEFENDANTS,
17 DIRECTOR BELAVICH, LACSD CUSTODIAL DEFENDANTS and/or DOE DEFENDANTS'
18 tortious acts and/or omissions described herein, Plaintiffs D. PULANE LUCAS and STANLEY
19 WILSON, SR., parents of Stanley Wilson, Jr., have suffered wrongful death damages that include,
20 without limitation, economic losses associated with (1) the loss of financial support that
21 DECEDENT would have contributed to the family during the life expectancy that DECEDENT
22 had before his death or the life expectancy of PLAINTIFFS, (2) the loss of gifts or benefits that
23 PLAINTIFFS would have expected to receive from DECEDENT, (3) funeral and burial expenses,
24 and (4) the reasonable value of household services that DECEDENT would have provided.

25 134. As a result of the tortious acts and omissions described herein, THE ESTATE claims
26 compensable pre-death pain and suffering of Stanley Wilson, Jr.

27 135. As a result of the tortious actions and omissions as described herein, THE ESTATE
28 is entitled to punitive damages because DIRECTOR BELAVICH, LACSD CUSTODIAL

1 DEFENDANTS and/or DOE DEFENDANTS acted with the intent to cause injury and/or their
2 conduct was despicable and was done with a willful and knowing disregard of the rights and or
3 safety of DECEDENT. At all relevant times, DIRECTOR BELAVICH, LACSD CUSTODIAL
4 DEFENDANTS and/or DOE DEFENDANTS were aware of the probable consequences of their
5 conduct and deliberately failed to avoid those consequences.

6 **FOURTH CAUSE OF ACTION FOR VIOLATIONS OF PENAL CODE § 10008 - FAILURE**

7 **TO REPORT IN-CUSTODY DEATHS OF INMATES**

8 **(Violations against COUNTY ENTITY DEFENDANTS AND DOE)**

9 136. PLAINTIFFS incorporate herein by reference, each and every allegation and
10 statement contained hereinabove as if the same had been set forth fully below .

11 137. Pursuant to Penal Code § 10008:

12 (a) When a person who is in custody dies, the agency with jurisdiction over the state or local
13 correctional facility with custodial responsibility for the person at the time of their death shall,
14 consistent with reporting requirements pursuant to Section 12525 of the Government Code, post all
15 of the following on its internet website:

16 (1) The full name of the agency with custodial responsibility at the time of death.

17 (2) The county in which the death occurred.

18 (3) The facility in which the death occurred, and the location within that facility where the
19 death occurred.

20 (4) The race, gender, and age of the decedent.

21 (5) The date on which the death occurred.

22 (6) The custodial status of the decedent, including, but not limited to, whether the person was
23 awaiting arraignment, awaiting trial, or incarcerated.

24 (7) The manner and means of death.

25 138. Furthermore, pursuant to Penal Code § 10008, the aforementioned information shall
26 be posted for the public to view on the agency's internet website within 10 days of the date of death.
27 If any of the information changes, including, but not limited to, the manner and means of death, the
28 agency shall update the posting within 30 days of the change. If the agency seeks to notify the next

1 of kin and is unable to notify them within 10 days of the death, the agency shall be given an
2 additional 10 days to make good faith efforts to notify next of kin before the information shall be
3 posted for the public to view on the agency's internet website.

4 139. Despite the clear and mandatory requirement of Penal Code § 10008, Stanley Wilson,
5 Jr.'s death was inadequately, improperly, and/or otherwise deficiently reported by COUNTY
6 ENTITY DEFENDANTS. As such, COUNTY ENTITY DEFENDANTS' protocols related to the
7 reporting of Stanley Wilson, Jr.'s death were not activated, which lead to a lack of an adequate and
8 immediate investigation as to the facts and/or circumstances surrounding his death. Despite at all
9 relevant times being in the custody and/or care of COUNTY ENTITY DEFENDANTS, Plaintiffs
10 hereon allege that, to date, Stanley Wilson, Jr.'s death is not listed as having appeared while in the
11 custody of COUNTY ENTITY DEFENDANTS. Furthermore, based upon information and belief,
12 Stanley Wilson, Jr.'s parents, D. PULANE LUCAS and STANLEY WILSON, SR., have, to date,
13 not been notified of any good faith efforts to report the death of their son, Stanley Wilson, Jr.
14 Plaintiffs hereon allege that, to date, Stanley Wilson, Jr.'s death is not listed in COUNTY ENTITY
15 DEFENDANTS' inmate death database(s) nor in COUNTY ENTITY DEFENDANTS' health care
16 services inmate death database(s), when it otherwise would have been posted under normal
17 circumstances.

18 140. As a result of the COUNTY ENTITY's failures, Stanley Wilson, Jr.'s parents were
19 painfully left with many unanswered questions about the in-custody death of their son due to
20 COUNTY ENTITY DEFENDANTS' failures to comply with the reporting requirements of Penal
21 Code § 10008.

22 141. As a result of the tortious actions and omissions as described herein, PLAINTIFFS
23 seek injunctive relief, including, without limitation, (1) a complete accounting of all in-custody
24 deaths – including of Stanley Wilson, Jr. – that have occurred in COUNTY ENTITY
25 DEFENDANTS' facilities, including at Twin Towers, and (2) that COUNTY ENTITY
26 DEFENDANTS be required to complete mortality reviews triggered by inmate death occurrences at
27 COUNTY ENTITY DEFENDANTS facilities, including at Twin Towers, that includes a mortality
28 review by both a physician and nurse reviewer prior to a reported in-custody death.

1 **PRAYER FOR RELIEF**

2 WHEREFORE, Plaintiff prays for judgment against all DEFENDANTSs, and each of them,
3 including Does 1 through 50, Inclusive, as follows:

- 4 1. For compensatory, general, and special damages against each Defendant, jointly and
5 severally, in an amount to be proven at trial;
- 6 2. For punitive and exemplary damages against COUNTY DHS DEFENDANTS, DIRECTOR
7 BELAVICH, LACSD CUSTODIAL DEFENDANTS, and DOE DEFENDANTS in an
8 amount appropriate to punish COUNTY DHS DEFENDANTS, DIRECTOR BELAVICH,
9 LACSD CUSTODIAL DEFENDANTS, and DOE DEFENDANTS and deter others from
10 engaging in similar misconduct;
- 11 3. For civil penalties as permitted by law;
- 12 4. For trebling of actual damages;
- 13 5. For costs of suit, including reasonable attorneys' fees;
- 14 6. For pre-judgment and post-judgment interest as permitted by law;
- 15 7. For injunctive relief that includes (1) a complete accounting of all in-custody deaths –
16 including of Stanley Wilson, Jr. – that have occurred in 2023 at COUNTY and California
17 Department of State Hospitals' facilities and (2) that COUNTY ENTITY DEFENDANTS
18 be required to complete mortality reviews triggered by inmate death occurrences at
19 COUNTY and California Department of State Hospitals' facilities that include a mortality
20 review by both a physician and nurse reviewer dating back at least 6 months prior to a
21 reported in-custody death; and


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8. For other such relief as the Court may deem proper.

Dated: October 15, 2025

CARPENTER & ZUCKERMAN

BY:  _____

John C. Carpenter
Carlos A. Hernandez
Gabriel Minsal
Attorney for Plaintiffs
ESTATE OF STANLEY WILSON, SR., D.
PULANE LUCAS, and STANLEY WILSON,
SR.

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DEMAND FOR JURY TRIAL

Plaintiffs ESTATE OF STANLEY WILSON, JR., D. PULANE LUCAS, and STANLEY WILSON, SR. hereby demand a trial of all causes by jury.

Dated: October 15, 2025

CARPENTER & ZUCKERMAN

BY:  _____

John C. Carpenter
Carlos A. Hernandez
Gabriel Minsal
Attorney for Plaintiffs
ESTATE OF STANLEY WILSON, SR., D.
PULANE LUCAS, and STANLEY WILSON,
SR/