C	ase 5:24-cv-02275	Document 1	Filed 10/25/24	Page 1 of 15	Page ID #:1
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16	DAVID HOOD,	CENTRAL		F CALIFORNI Case No	A . 5:24-cv-2275
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16 17 18	V.	CENTRAL Plaintiff,	DISTRICT OF	F CALIFORNI Case No	A . 5:24-cv-2275
16 17 18 19	v. KAREN ROSS, the California Do	CENTRAL Plaintiff, Secretary of A epartment of F	DISTRICT OF	F CALIFORNI Case No	A . 5:24-cv-2275
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INTRODUCTION

This lawsuit asserts a homeowner's Fourth Amendment rights against the 2 execution of an unconstitutional general warrant against the curtilage of his home. 3 4 Under the U.S. Constitution's Fourth Amendment, a warrant must particularly 5 describe the property to be searched. The warrant executed against Mr. Hood's did 6 not. Instead, it included a map with a border drawn around a 554-square-mile area. Mr. Hood's property was one of the many thousands inside that border. 7

The reason Mr. Hood's property was searched was the control of an invasive 8 9 species of fly. No flies or larvae were found. But while controlling invasive species is a legitimate and laudable goal, it must be accomplished through legitimate and 10 11 constitutional means. There are a great many reasons to protest invasions into one's 12 private property by agents of the state, even for those with nothing to hide. Indeed, 13 intrusions into the curtilage are constitutionally equivalent to intrusions into the home itself because the intimate activities of daily life extend to this area immediately 14 surrounding the home and thus intrusions there threaten the security and privacy that 15 the Fourth Amendment was drafted to defend. When Mr. Hood objected to the search 16 of his property, the officers should have furnished a judge with probable cause that 17 fruit flies were likely to be found on his property and obtained a specific warrant. 18 19 They had ample time to request such a warrant from a judge.

20 Mr. Hood pursues legal relief through this lawsuit for nominal damages, a declaratory judgment, and prospective injunctive relief to hold those accountable 21 who have resurrected the primary evil the Fourth Amendment was drafted to kill, and 22 to prevent them from doing it again. 23

JURISDICTION AND VENUE

1. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. §§ 1331

(federal question jurisdiction) and 1343 (jurisdiction to redress deprivations of

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civil rights), and the Civil Rights Act of 1871, 42 U.S.C. § 1983.

1	2. The Court has authority to provide the relief requested under the Fourth
2	Amendment, as incorporated against the states by the Fourteenth Amendment,
3	28 U.S.C. §§ 2201 and 2202 (Declaratory Judgment Act), 42 U.S.C. § 1983,
4	and its inherent equitable powers.
5	3. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b)(1) and (2)
6	because all parties to the litigation reside, a substantial part of the events or
7	omissions giving rise to Plaintiff's claims occurred, and the property that is the
8	subject of this action is located, within this judicial district.
9	4. Defendants Ross, Duryee, Dallin, and Does 1 and 2 are "persons" within the
10	meaning of 42 U.S.C. § 1983. See Will v. Michigan Dep't of State Police, 491
11	U.S. 58, 71 n.10 (1989).
12	PARTIES
13	5. Plaintiff David Hood is a United States citizen and homeowner residing at
14	30595 Palo Alto Drive, Redlands, CA 92373.
15	6. Mr. Hood's home is located within the 554-square-mile project area
16	boundaries covered by the warrant at issue in this action and he resided there
17	at the time of the controversy that forms the basis for this Complaint.
18	7. The warrant is attached to this Complaint as Exhibit A and incorporated by
19	reference.
20	8. Defendant Karen Ross is the California Secretary of Agriculture and head of
21	the California Department of Food and Agriculture (CDFA).
22	9. In her capacity as Secretary of Agriculture, she is charged with enforcing the
23	California Food and Agricultural Code. By enforcing the policies complained
24	of in this action, she deprived Mr. Hood of his right to be free from
25	unreasonable searches. Defendant Ross is sued in her official capacity.
26	10. The CDFA is the California state governmental department responsible for
27	enforcing the California Food and Agricultural Code.
28	///

- 11.CDFA promulgated the January 12, 2024 Proclamation of Emergency
 Program (Proclamation), under the direction of Defendant Ross, and then
 sought, obtained, and executed the warrant at issue in this action under the
 purported authority of said proclamation and Defendant Ross.
 12.Defendant John Doe 1 is employed by the CDFA and, in conjunction with
 Defendants Dallin and John Doe 2 of the California Highway Patrol, executed
 - the warrant to search Mr. Hood's property on April 4, 2024. Defendant John Doe 1 is sued in his personal capacity for nominal damages and official capacity for equitable relief.
- 13.Defendant Sean A. Duryee is the Commissioner of the California Highway
 Patrol (CHP). In his capacity as Commissioner of the CHP, Defendant Duryee
 is responsible for enforcing the laws of the State of California, including those
 laws under which the warrant that is the subject of this action was executed.
 Defendant Duryee is sued in his official capacity for equitable relief.
- 14. The CHP is the principal state police agency for the State of California
 responsible for, *inter alia*, assisting state agencies such as the CDFA in the
 enforcement of administrative warrants. CHP officers, in conjunction with
 CDFA officers, executed the unconstitutional general warrant to search Mr.
 Hood's property on April 4, 2024.
- 15.Defendant Ryan Dallin is an officer of the CHP who, together with John Does
 1 and 2, executed the warrant to search Mr. Hood's property on April 4, 2024.
 Defendant Dallin is sued in his personal capacity for nominal damages and
 official capacity for equitable relief.
- 16.John Doe 2 is an officer of the CHP with the last name of "Peterson" who,
 together with Defendant Dallin and John Doe 1, executed the warrant to search
 Mr. Hood's property on April 4, 2024. Defendant John Doe 2 is sued in his
 personal capacity as to damages and official capacity for equitable relief.
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17.Defendants Ross, John Doe 1, Duryee, Dallin, and John Doe 2 have authority under the laws of California to implement and administer the CDFA's provisions. The officials are accordingly subject to an official capacity suit for equitable relief from the unconstitutional enforcement of general warrants that violate Mr. Hood's federal constitutional rights under *Ex parte Young*, 209 U.S. 123 (1908).

LEGAL BACKGROUND

The Fourth Amendment Prohibits General Warrants

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18. The Fourth Amendment to the United States Constitution states:

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue but upon probable cause, <u>supported by Oath or affirmation, and particularly describing the places</u> to be searched and the persons or things to be seized.

U.S. Const. Amend. IV (emphasis added).

19.Enacted largely as a response to abuses by British customs agents during the 16 colonial era, the Fourth Amendment expressly prohibits general warrants-17 that is, warrants that do not specify the particular places to be searched and/or 18 items to be seized. See Carpenter v. United States, 585 U.S. 296, 303 (2018) 19 20 ("The Founding generation crafted the Fourth Amendment as a response to the reviled general warrants and writs of assistance of the colonial era[.]") 21 (citations and punctuation omitted); United States v. Chadwick, 433 U.S. 1, 7-22 8 (1977) ("It cannot be doubted that the Fourth Amendment's commands grew 23 in large measure out of the colonists' experience with the writs of assistance 24 and their memories of the general warrants formerly in use in England."). 25

20. The Fourth Amendment's protection of the People's right to be secure in their
"houses" against unreasonable search and seizure extends not just to the
interior living area of their homes, but also to the area immediately surrounding

1 them (known as the curtilage), to which the intimate activities of home life extend. Florida v. Jardines, 569 U.S. 1, 6-7 (2013). 2 21. The privacy interests protected by the Fourth Amendment are particularly 3 acute in the context of private homes and their surrounding curtilage. See Kyllo 4 v. United States, 533 U.S. 27, 34 (2001); Camara v. Mun. Ct. of the City and 5 6 *Cnty. of San Francisco*, 387 U.S. 523 (1967). 22. The warrant requirement extends beyond the criminal context and applies to 7 administrative searches for code enforcement, the regulatory laws, and other 8 special needs. Camara, 387 U.S. at 534. While administrative searches may 9 sometimes be justified by something less than probable cause of a specific 10 11 violation on the property, they must be supported by a warrant that complies with both the Oath-or-affirmation and the particularity requirements of the 12 Fourth Amendment. Id. at 536–38. 13 California's Fruit Fly Quarantine Regime 14 23.Section 5753 of the California Food and Agricultural Code authorizes the 15 Secretary of Agriculture to, "in a summary manner," "disinfect or take such 16 other action, including removal or destruction, with reference to any such 17 public nuisance, which he thinks is necessary." 18 24.On January 12, 2024, Defendant Ross issued a Proclamation of Emergency 19 20 Program, declaring oriental fruit flies in the State to be a significant threat to agriculture and the environment. 21 25. The Proclamation creates a "project area boundary" encompassing a 554-22 square-mile area (Search Area), and directs CDFA officials to engage in a 23 program of monitoring, treatment, and removal of fruit flies and potentially 24 infected fruit. 25 26. The Proclamation requires consent from property owners for CDFA officials 26 to engage in certain treatments on their properties, but includes no such consent 27 requirements for entries or searches and provides no guidance for responding 28

1	to any property owners who do not consent to CDFA officials entering their
2	property.
3	27. The Proclamation states that it shall remain in force until July 21, 2025.
4	28.As Secretary of the CDFA, Defendant Ross is responsible for the measures
5	employed by CDFA to control fruit flies, including the use of general warrants,
6	and specifically, the execution of the warrant against Mr. Hood.
7	29.On information and belief, CHP works in conjunction with CDFA in the
8	execution of search and seizure warrants as a general practice.
9	30.Defendant Duryee, as the Commissioner of CHP, is responsible for the CHP
10	officers involved in executing warrants in conjunction with CDFA, and
11	specifically, the execution of the warrant against Mr. Hood.
12	FACTUAL ALLEGATIONS
13	Mr. Hood's Property
14	31.David Hood is a homeowner who lives in Redlands, California, in a home he
15	and his wife purchased in 2010.
16	32.Like thousands of his neighbors in this area of Southern California long known
17	for its citrus, Mr. Hood has several citrus trees in his backyard.
18	33.Mr. Hood's home, located at 30595 Palo Alto Drive, Redlands, CA 92373, was
19	within the Search Area boundaries established in the Proclamation.
20	34.Mr. Hood's home has remained within the steadily enlarging boundaries of the
21	Search Area throughout each amendment to the Proclamation (on October 12,
22	2023, November 2, 2023, November 29, 2023, and January 12, 2024), and
23	remains within the Search Area at the time of filing this Complaint.
24	35.No oriental fruit fly infestation has ever been found on Mr. Hood's property.
25	36.Upon information and belief, Defendants have made no specific findings or
26	allegations regarding Mr. Hood's property to establish probable cause for a
27	specific warrant.
28	///

1	The Warrant
2	37. Shortly after issuing the Proclamation, the CDFA applied to the San
3	Bernardino County Superior Court for an "inspection and abatement" warrant
4	to enter private properties to inspect them for evidence of oriental fruit flies.
5	The court issued the warrant on February 15, 2024.
6	38. The warrant covered a 554-square-mile area, an area nearly 12 times the size
7	of San Francisco.
8	39. The warrant authorized CDFA officials to enter and search the exterior areas
9	of any property within the 554-square-mile Search Area including curtilage,
10	and further authorized CDFA officials to execute the warrant regardless of
11	whether the property owner was present or even aware of the search.
12	40. The warrant further authorized any peace officer to "use such reasonable force
13	as is necessary for Department employees to gain entry to the exterior premises
14	and to conduct any and all inspection and abatement activities to which this
15	warrant pertains."
16	41. The warrant provided CDFA officials with judicially unconstrained discretion
17	over which properties to search within the 554-square-mile Search Area, with
18	no mechanism for precompliance review or the establishment of probable
19	cause with respect to the search of any particular property.
20	42. While the Warrant prospectively required CDFA officials to find oriental fruit
21	fly larvae within a certain number of miles of any particular property to be
22	searched, the warrant did not require any oath, affirmation, or affidavit
23	establishing the existence of this precondition.
24	43.No oath, affirmation, affidavit, or statement of probable cause was furnished
25	to any court concerning the finding of oriental fruit flies or their larvae near
26	Mr. Hood's particular property.
27	44.Defendants, neither jointly nor severally, made any effort or application to
28	obtain a specific warrant for Mr. Hood's property.

1 45.No oath, affirmation, affidavit, or statement of probable cause was furnished to any court concerning the likelihood of finding oriental fruit flies or their 2 larvae on Mr. Hood's particular property. 3 46. The warrant did not include Mr. Hood's name, address, or any identifying 4 information whatsoever to distinguish his home from the thousands of homes 5 6 the warrant facially applied to. 47.No specific places or persons were described in the warrant or any form 7 appended thereto. 8 9 48. The warrant was set to expire after 90 days, and so expired on June 20, 2024. The Proclamation, however, remains in effect until July 21, 2025. 10 49. Absent action by this Court, there is a substantial likelihood that similar 11 unconstitutional general warrants will be obtained and executed against Mr. 12 Hood's property in the future. 13 **CDFA** demands to search Mr. Hood's property 14 50. During the Spring of 2024, CDFA posted a notice on Mr. Hood's front door 15 requesting permission to search his property for oriental fruit flies, indicating 16 that some flies had been spotted recently in his neighborhood and that his 17 property was believed to contain "host material" (i.e., citrus fruits on the trees 18 in his backyard). While the notice sought consent, it also asserted CDFA's 19 20 authority to search the property regardless of whether Mr. Hood consented. 51.Mr. Hood responded by phone and email to CDFA after reviewing the notice, 21 indicating that he would be withholding his consent. Mr. Hood indicated that 22 he opposed government agents trespassing on his property, but offered to send 23 photographs of his citrus trees to the CDFA to show they did not currently bear 24 any fruit. 25 52.CDFA informed Mr. Hood that it had authority to search his property without 26 permission and told Mr. Hood he must allow the inspection. 27 /// 28

1	53.On or about March 28, 2024, CDFA posted a second notice on Mr. Hood's				
2	front door informing him that the property was subject to inspection and that				
3	he must contact CDFA "no later than 4:30 p.m., Monday April 1, 2024 to				
4	schedule the removal of all host fruit from [his] property."				
5	54. Communications from CDFA to Mr. Hood repeatedly emphasized that all of				
6	Mr. Hood's neighbors were consenting to the inspections without the need for				
7	the execution of the warrant.				
8	CDFA executes the general warrant against Mr. Hood				
9	55.On or about April 5, 2024, CDFA Defendant Doe 1, accompanied by CHP				
10	Defendants Dallin and Doe 2, arrived at Mr. Hood's property to execute the				
11	warrant and search his property.				
12	56.CDFA had ample time between its initial communication with Mr. Hood and				
13	its search of Mr. Hood's property to apply for a specific warrant and receive a				
14	decision thereon from a court of competent jurisdiction.				
15	57.Mr. Hood met the CDFA and CHP officers at the foot of his long, steep				
16	driveway.				
17	58.Mr. Hood pointed to the warrant in Defendant Dallin's hands, informing him				
18	that the document did not list his name or address and that it was therefore				
19	invalid.				
20	59.Mr. Hood pointed out to Defendant Dallin that the warrant covered an area of				
21	over 500 square miles.				
22	60. The officer inspected the warrant carefully and announced that it was valid,				
23	concluding verbally that Mr. Hood's property was within that area.				
24	61.CDFA Defendant John Doe 1 informed Mr. Hood while the warrant was being				
25	executed that every other property within the neighborhood had already been				
26	searched, but that Mr. Hood's property was the only one that they hadn't been				
27	able to access.				
28	///				

1	62.Mr. Hood made it clear that he did not consent to the search, but that he would				
2	not resist the warrant's execution.				
3	63.Under protest, Mr. Hood then accompanied CDFA officer John Doe 1,				
4	Defendant Dallin, and Defendant John Doe 2 up his driveway to the hill atop				
5	which his house sits.				
6	64. The Defendant officers proceeded past the driveway, around the garage, past				
7	a fence, and into Mr. Hood's backyard, where the Defendant officers inspected				
8	the trees around Mr. Hood's patio, directly adjacent to his house.				
9	65.Mr. Hood's patio is an area directly adjacent to and behind his house.				
10	66. The backdoor of Mr. Hood's house opens directly onto the patio.				
11	67. The patio is enclosed by a fence and contains a swimming pool, lounge chairs,				
12	grill, pergola, fire pit, swing, and basketball hoop.				
13	68. The patio is an area to which the intimate activities of Mr. Hood's residential				
14	home life extends, where his family cooks, eats, and relaxes.				
15	69.No oriental fruit flies or "host material" were found during the inspection.				
16	70.After the inspection, Mr. Hood accompanied the officers back down the hill				
17	and off his property.				
18	71. The officers informed him that he was the only property owner against whom				
19	they had to execute the warrant.				
20	72. Throughout the April 4 encounter, Mr. Hood was respectful to the officers, but				
21	firmly and repeatedly stated that he did not consent to the search of his				
22	property.				
23	CDFA is a repeat offender with general warrants				
24	73. While the particular warrant enforced upon Mr. Hood expired after 90 days,				
25	the Proclamation, which was first issued on September 27, 2023, remains in				
26	effect until July 21, 2025 and continues to include Mr. Hood's home within				
27	the designated Search Area.				
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1	74.CDFA has obtained and executed several general warrants similar to the one	
2	at issue in this case targeting residential areas of San Bernardino County,	
3	California within the past five years.	
4	75. With CDFA's repeated and recent practice of obtaining and executing general	
5	warrants within San Bernardino County, there is a substantial and impending	
6	likelihood that Mr. Hood's property will again be subject to another general	
7	warrant of similar dimension and unconstitutionality as the warrant already	
8	executed against his property.	
9	CLAIM FOR RELIEF	
10	Count I	
11	Violation of Mr. Hood's Fourth Amendment Rights	
12	(Fourth Amendment and 42 U.S.C. § 1983)	
13	76.Plaintiff realleges and incorporates the allegations in the preceding paragraphs.	
14	77. The Fourth Amendment prohibits general warrants, commanding that all	
15	warrants be "supported by Oath or affirmation" and "particularly describ[e]	
16	the places to be searched and the persons or things to be seized."	
17	78. Physical trespasses to persons, houses, papers, and effects are searches under	
18	the Fourth Amendment. Florida v. Jardines, 569 U.S. 1, 10-11 (2013) (citing	
19	United States v. Jones, 565 U.S. 400, 406–09 (2012)).	
20	79. The warrant issued on February 15, 2024 and executed against Mr. Hood on	
21	April 4, 2024 is a general warrant in violation of the U.S. Constitution's Fourth	
22	Amendment.	
23	80. The execution of the warrant against Mr. Hood's property constituted an	
24	unlawful search and violated Mr. Hood's fundamental Fourth Amendment	
25	right to be secure in his house and curtilage against unreasonable searches.	
26	81. The warrant executed against the curtilage of Mr. Hood's house was not	
27	adequately supported by an "oath or affirmation" respecting his property.	
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1 82. The warrant did not "particularly describ[e] the places to be searched and the persons or things to be seized," rendering it general in nature rather than 2 specific. 3 83.On its face, the warrant applied equally to nearly every piece of property 4 located within a 554-square-mile area, an area that includes thousands of 5 6 residential households, without regard for whether citrus trees are present on any individual property. 7 84. The warrant included no list of names or addresses, nor any particular, 8 9 identifying information for the specific properties to be searched. 85.Defendants acted under color of state law at all times relevant to the facts 10 related in this Complaint, including the execution of the general warrant 11 against Mr. Hood. 12 86. The right to be free from unreasonable searches of houses and curtilage 13 through general warrants is clearly established in this nation's history, legal 14 tradition, the plain meaning of the text employed by the U.S. Constitution's 15 16 Fourth Amendment, and historical and contemporary judicial interpretations thereof. 17 87.A reasonable government official in each of Defendants' places would 18 understand that the execution of a general warrant against a homeowner's 19 20 curtilage is an unreasonable search in violation of that homeowner's federally protected Fourth-Amendment rights. 21 88. The Civil Rights Act of 1871 (codified as 42 U.S.C. § 1983) provides a private 22 right of action for challenging deprivations of an individual's "rights, 23 privileges, or immunities secured by the Constitution and laws" conducted by 24 state and local governments under color of law. It provides for compensatory, 25 equitable, "or other proper proceedings for redress." 26 89. In the process of executing the warrant against Mr. Hood, CDFA and CHP 27 officers entered the curtilage of Mr. Hood's private residence without 28

1	obtaining the consent of Mr. Hood or any other resident and searched his				
2	home's curtilage under the asserted authority of the warrant, the Proclamation,				
3	and California state law, in violation of the U.S. Constitution's Fourth				
4	Amendment, as applied to the States through the Fourteenth Amendment, and				
5	42 U.S.C. § 1983.				
6	PRAYER FOR RELIEF				
7	Wherefore, Plaintiff respectfully requests that this Court enter judgment in his				
8	favor and provide the following relief:				
9	1. Declare that the warrant described by this complaint, a copy of which is				
10	appended hereto as Exhibit A, is a general warrant that violates the U.S.				
11	Constitution's Fourth Amendment;				
12	2. Declare that the execution of the warrant against the curtilage of Mr. Hood's				
13	house violated Mr. Hood's constitutional right to be secure in his house and				
14	curtilage against unreasonable searches under the U.S. Constitution's Fourth				
15	Amendment;				
16	3. Permanently enjoin Defendants, their officers, agents, servants, employees,				
17	and all persons in active concert or participation with them from enforcing				
18	against Mr. Hood's house or curtilage any general warrant of the same or				
19	substantially similar dimensions as the one complained of in this action;				
20	4. Award Plaintiff nominal money damages in compensation for the violation of				
21	his Fourth Amendment rights, which occurred through an unlawful physical				
22	trespassory search pursuant to a general warrant;				
23	5. Award Plaintiff his costs, attorneys' fees, and other expenses in accordance				
24	with law, including 42 U.S.C. § 1983; and				
25	6. Order such additional relief as justice may require.				
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EXHIBIT A

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DUPLICATE ORIGINAL	1 2 3 4 5 6 7	ROB BONTA Attorney General of California ERIC M. KATZ, State Bar No. 204011 Supervising Deputy Attorney General BENJAMIN LEMPERT, State Bar No. 344239 Deputy Attorney General 300 South Spring Street, Suite 1702 Los Angeles, CA 90013-1230 Telephone: (213) 269-6731 Fax: (916) 731-2128 E-mail: benjamin.lempert@doj.ca.gov Attorneys for Applicant California Department of Food and Agriculture	
	8	[EXEMPT FROM FILING FEES-	
	9	GOV. CODE § 6103]	
	10	SUPERIOR COURT OF THE STATE OF CALIFORNIA	
	11	COUNTY OF SAN BERNARDINO	
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	12	· *	10 m m m m m m m m m m m m m m m m m m m
	13	In the Matter of:	D
	15	APPLICATION OF THE CALIFORNIA	3
		DEPARTMENT OF FOOD AND $/Wi$	
	16	ABATEMENT WARRANT FOR	1
	17	ERADICATION PROJECT IN SAN [Code Civ Proc. § 1822 59: Food & Acr	
	18	BERNARDINO COUNTY, CALIFORNIA Code, § 5763]	
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[proposed] Inspection and Abatement Warrant

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THE PEOPLE OF THE STATE OF CALIFORNIA TO THE CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE, GOOD CAUSE APPEARING:

This warrant authorizes the California Department of Food and Agriculture 4 ("Department") to conduct certain inspection and abatement activity within those portions of a 5 Program Area depicted in Exhibit 1 that are contained within San Bernardino County (the San 6 Bernardino Program Area). Exhibit 2 provides a map at the street-level of the boundaries of the 7 Program Area. Within the San Bernardino Program Area, this warrant authorizes the Department 8 to enter exterior areas of property to remove fruits within 100 meters of sites (e.g., a tree or bush) 9 where the Department has detected or subsequently detects immature oriental fruit flies, mated 10 female oriental fruit flies, or multiple adult oriental fruit flies. In the event that the Department 11 discovers immature oriental fruit flies or mated female oriental fruit flies at five or more distinct 12 sites in a 60-day period, and each of these sites is separated by no more than a mile, this warrant 13 additionally authorizes the Department to enter exterior areas of property to remove fruits within 14 a half-mile of these sites. The Department is authorized to take such actions pursuant to Food and Agricultural Code section 5763 and the Proclamation of Emergency Program ("Proclamation") issued by the Department on January 12, 2024.

The Court finds that there is a significant, clear, and imminent threat posed by the oriental 18 fruit fly in certain areas in San Bernardino County, as detailed in the Proclamation and depicted in 19 the accompanying exhibits. Consequently, the inspection and abatement activities authorized 20 herein may commence on the calendar day following the issuance of this warrant, beginning at 21 8:00 a.m. and ending at 5:00 p.m. on each day, and the Department is authorized to execute this 22 warrant whether or not the property is occupied at the time of your arrival for execution. 23

Any peace officer is authorized to use such reasonable force as is necessary for Department employees to gain entry to the exterior premises and to conduct any and all inspection and abatement activities to which this warrant pertains.

26 Pursuant to Code of Civil Procedure section 1822.55, the Court finds that it is in the 27 public interest to issue this warrant for a period of 90 days, commencing tomorrow, unless further 28

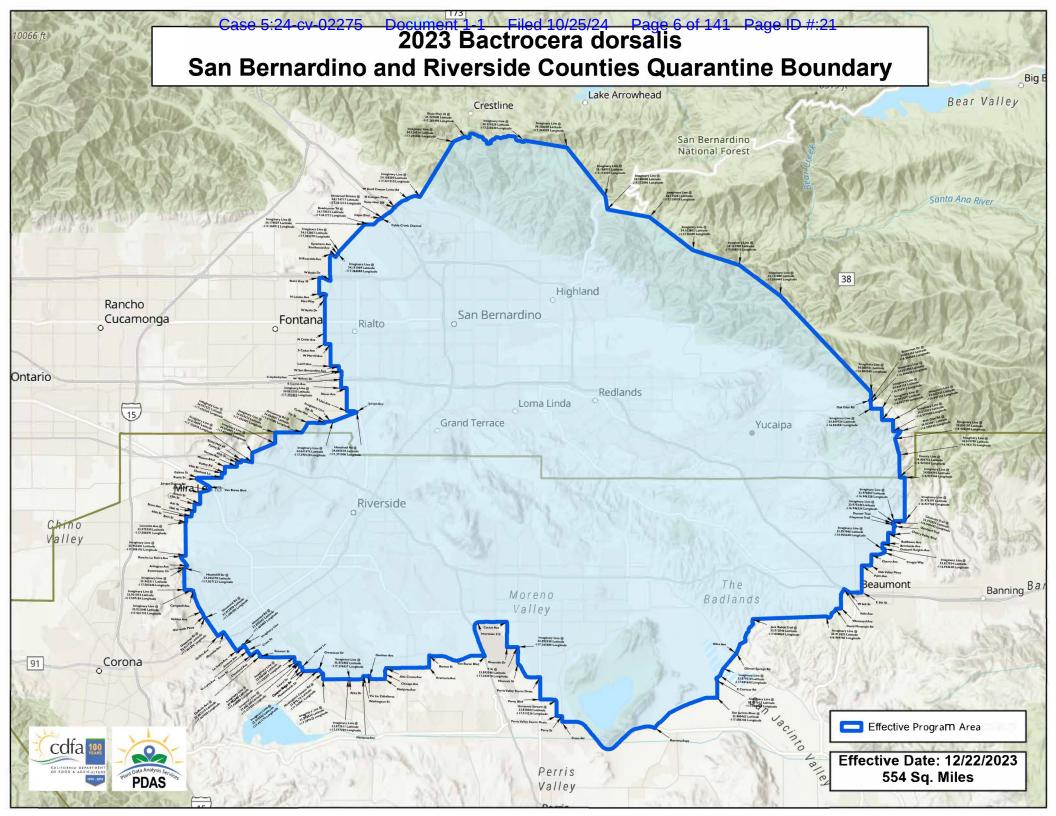
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Document 1-1

Filed 10/25/24

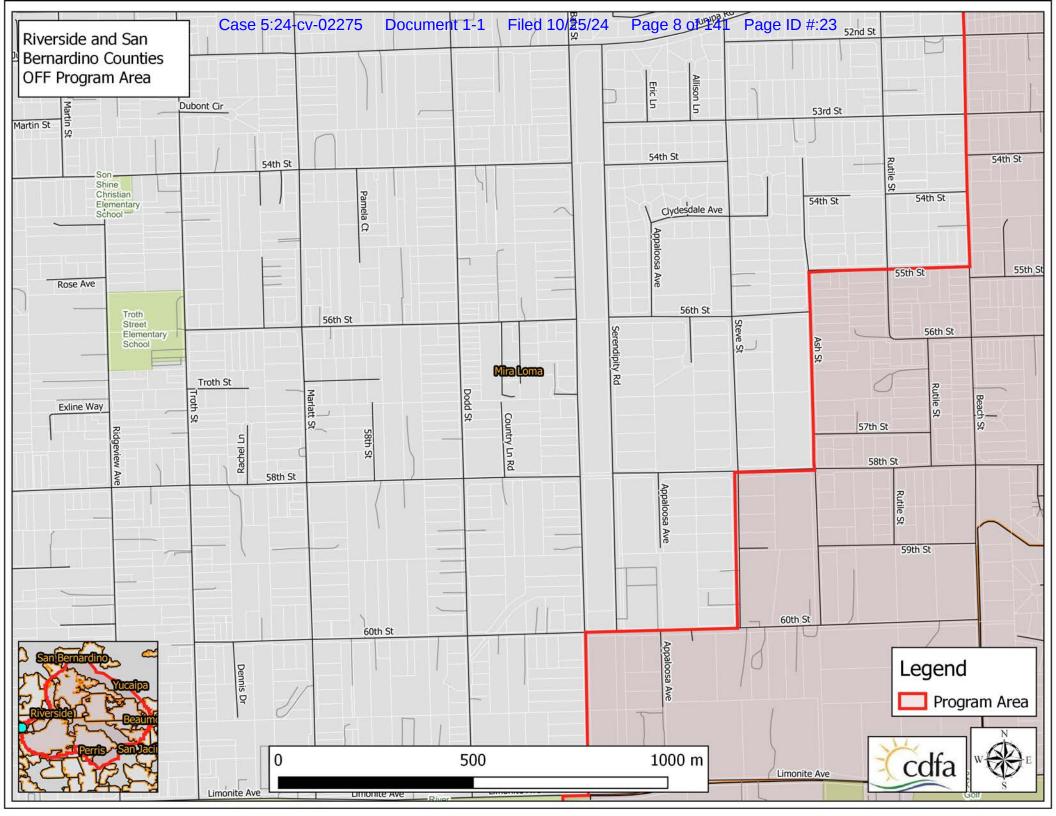
extended or renewed, and it shall thereafter be returned to the judge whose signature appears below. Dated: February JUDGE OF THE SUPERIOR COURT COUR

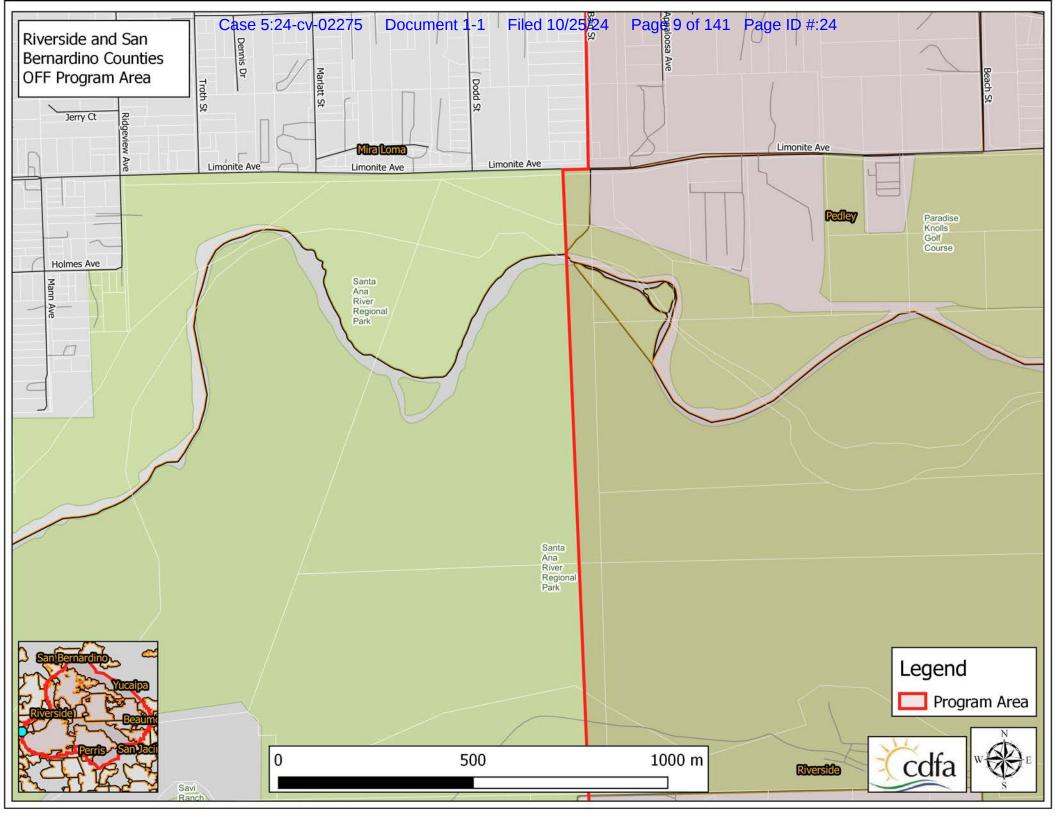
EXHIBT 1

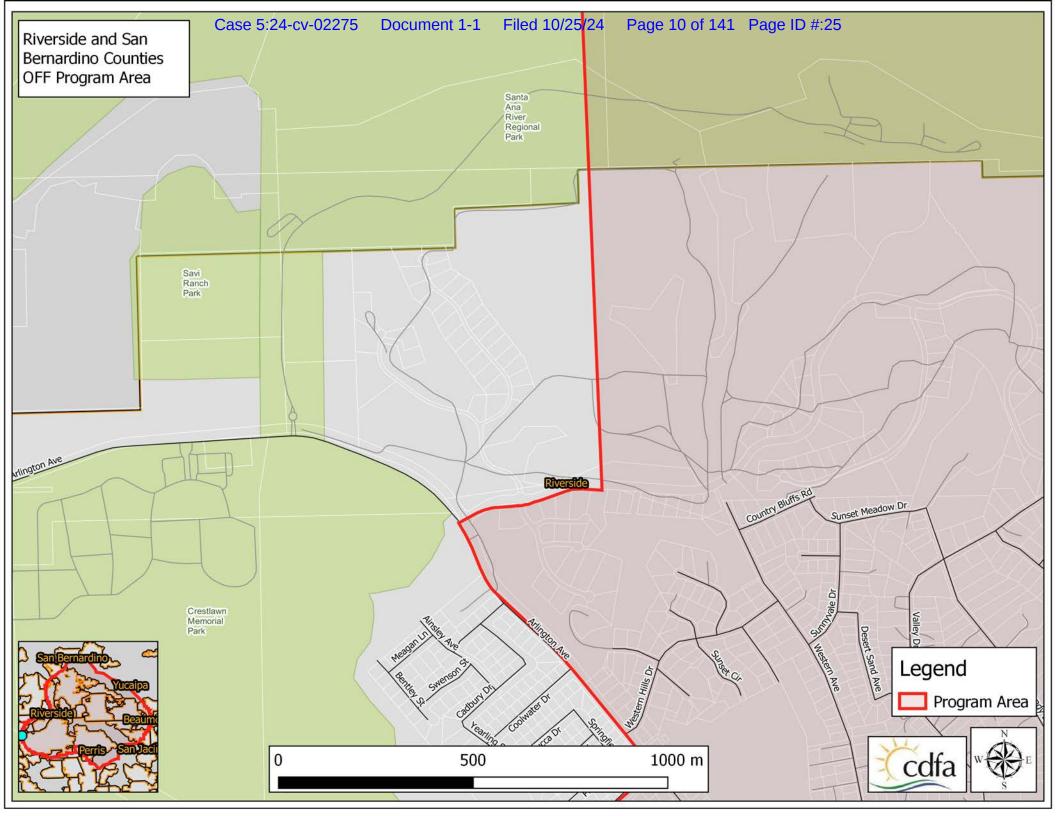


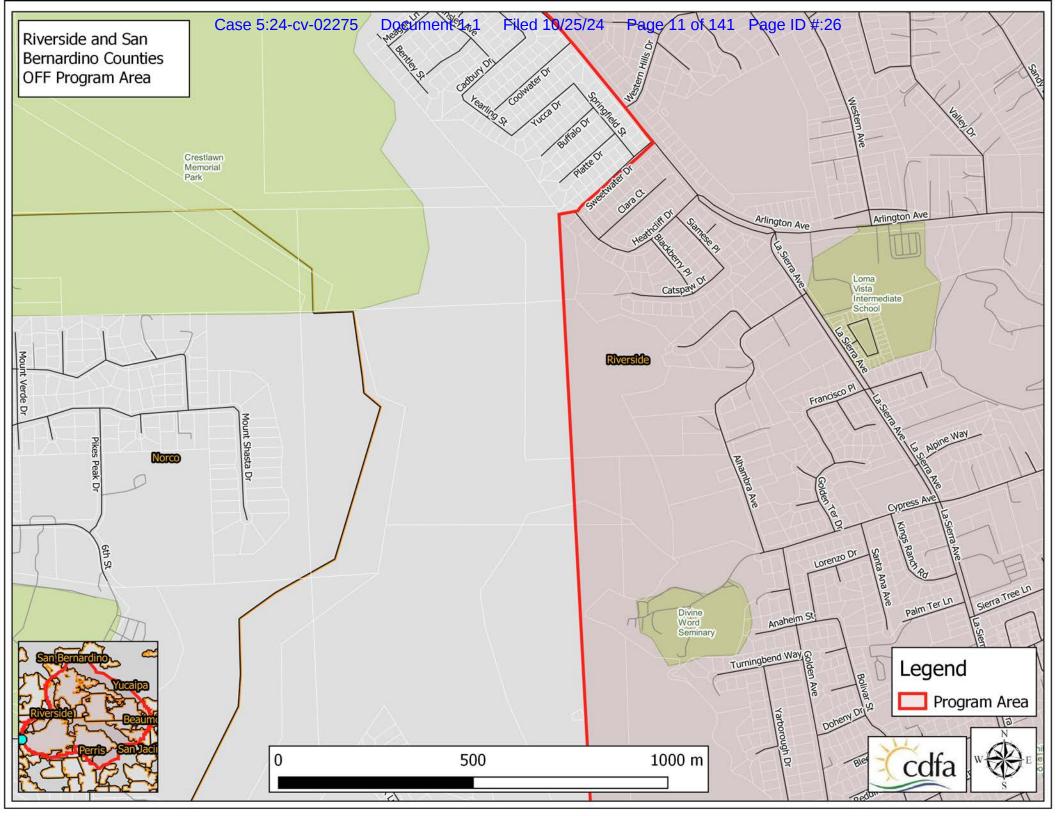
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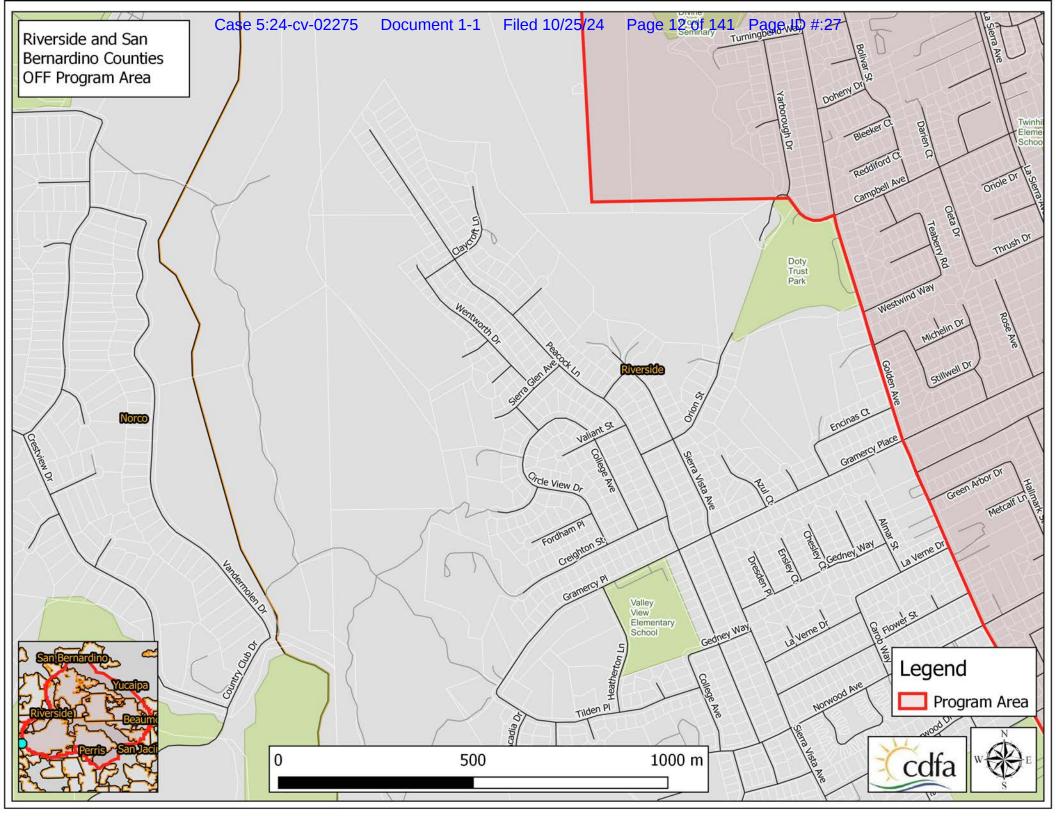
EXHIBIT 2

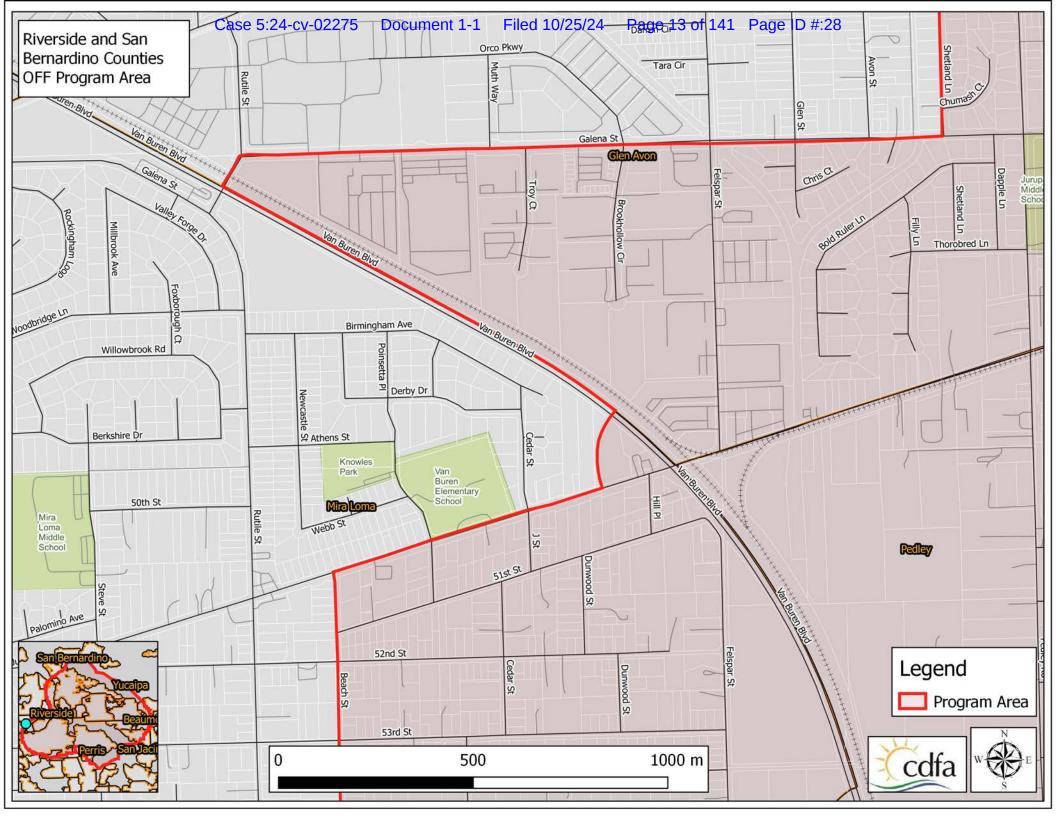


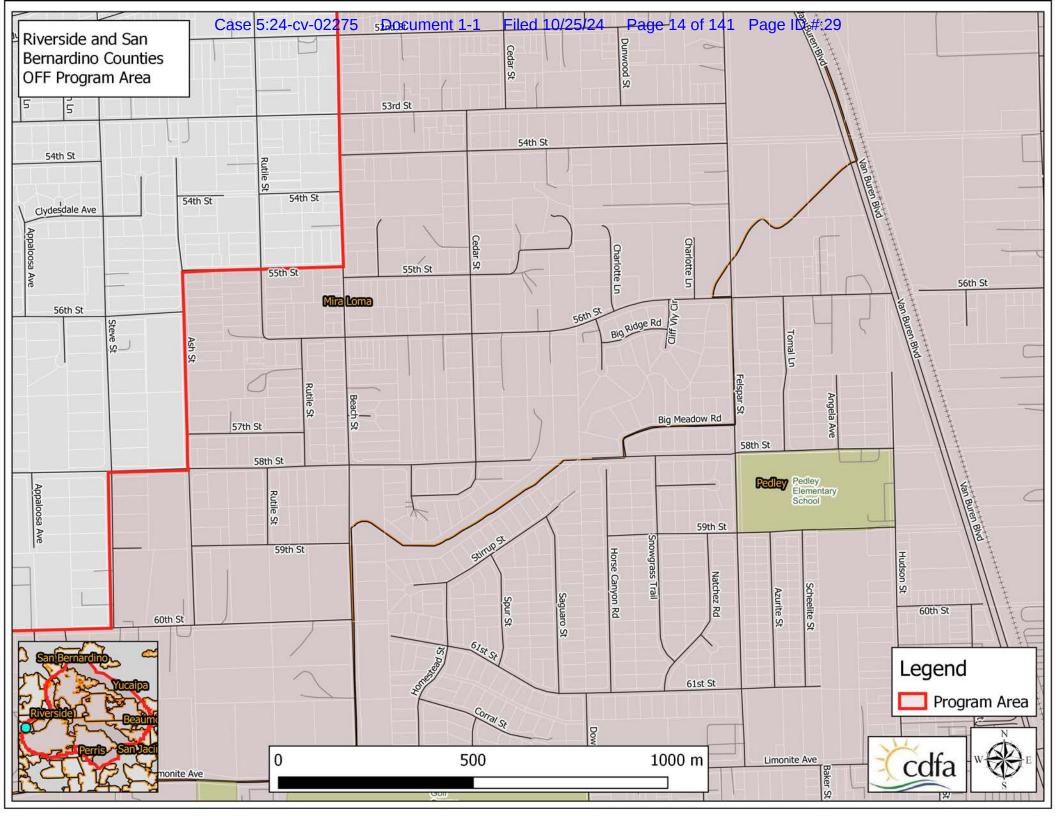


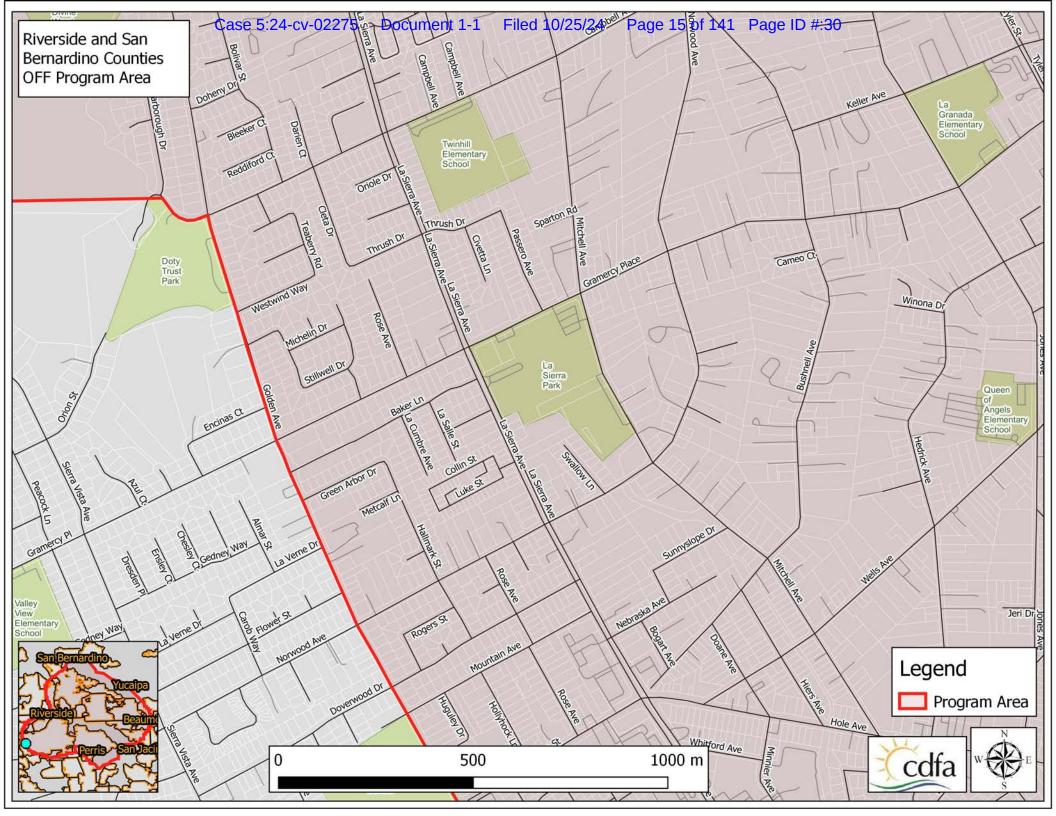


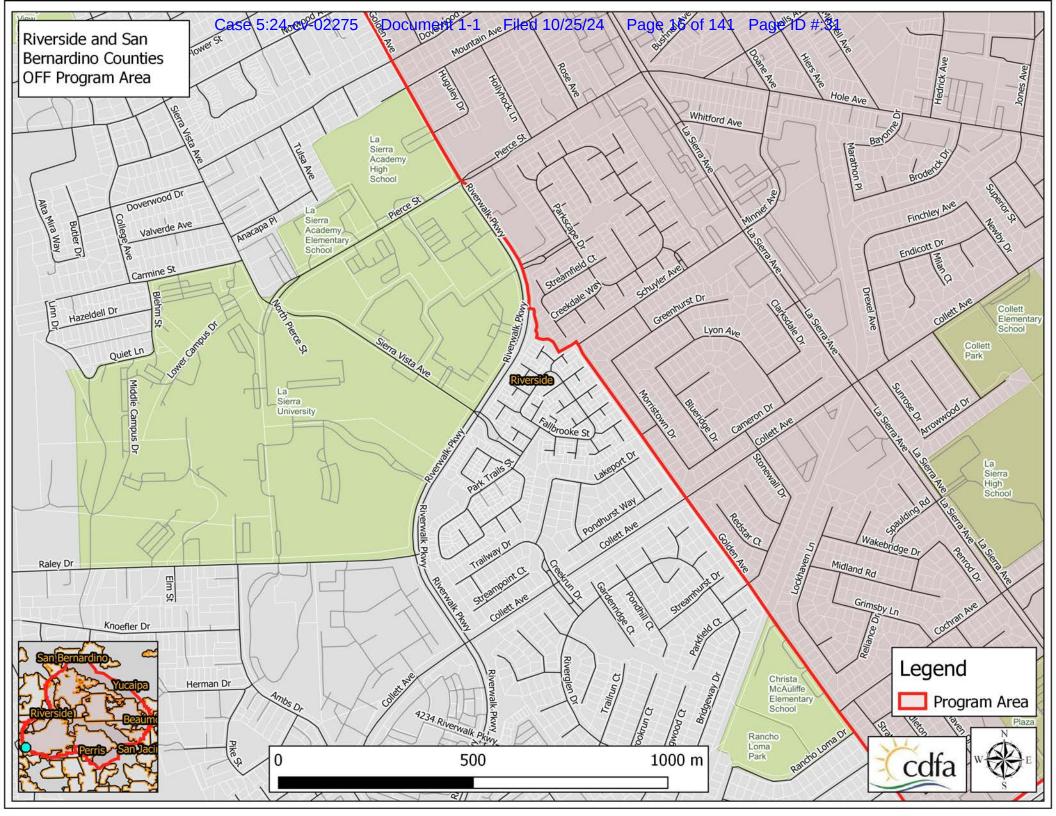


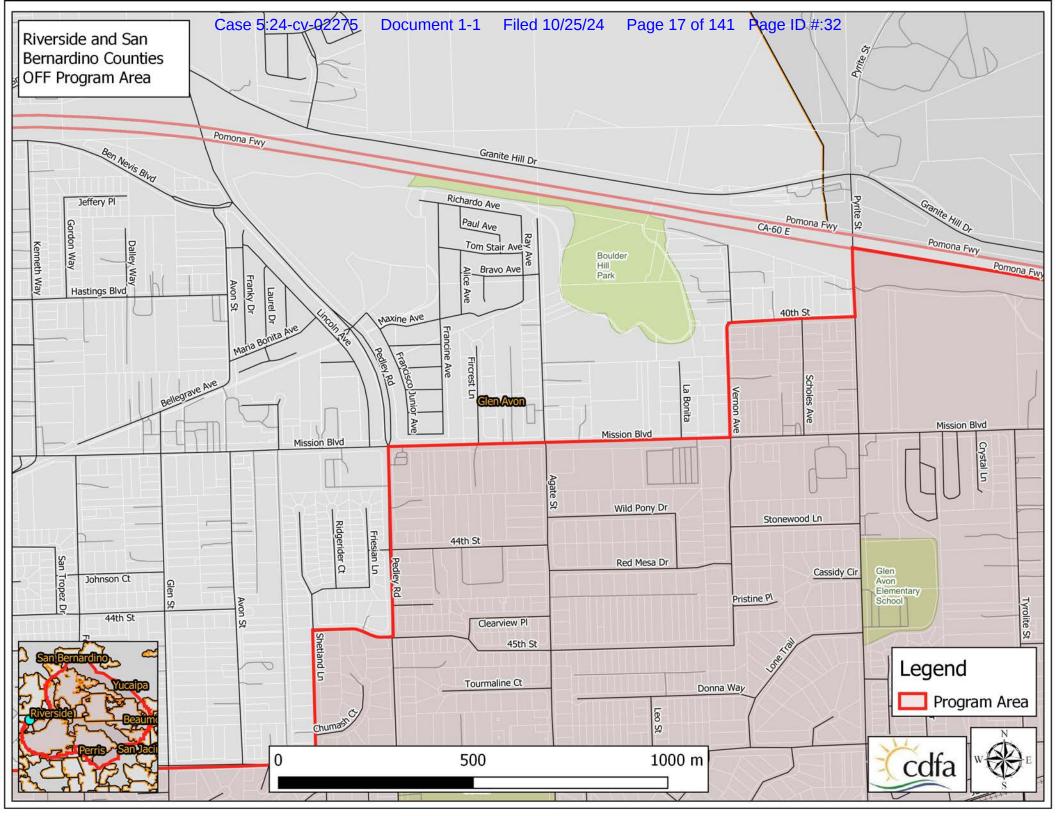


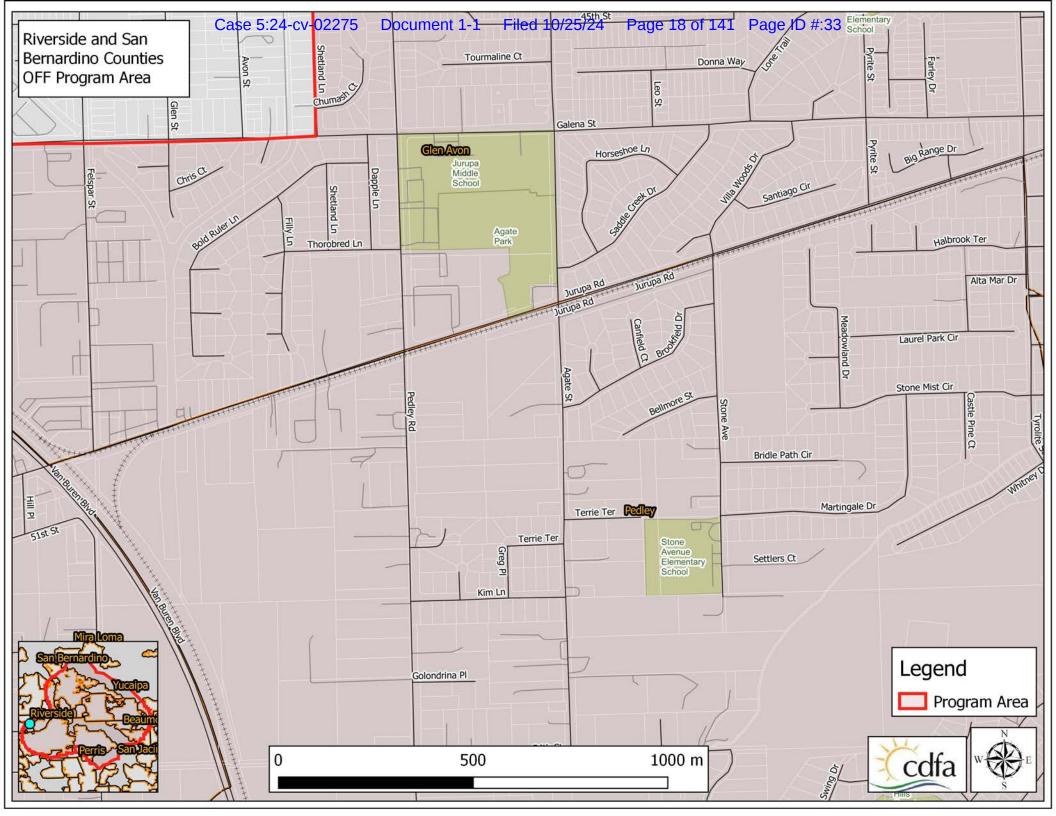


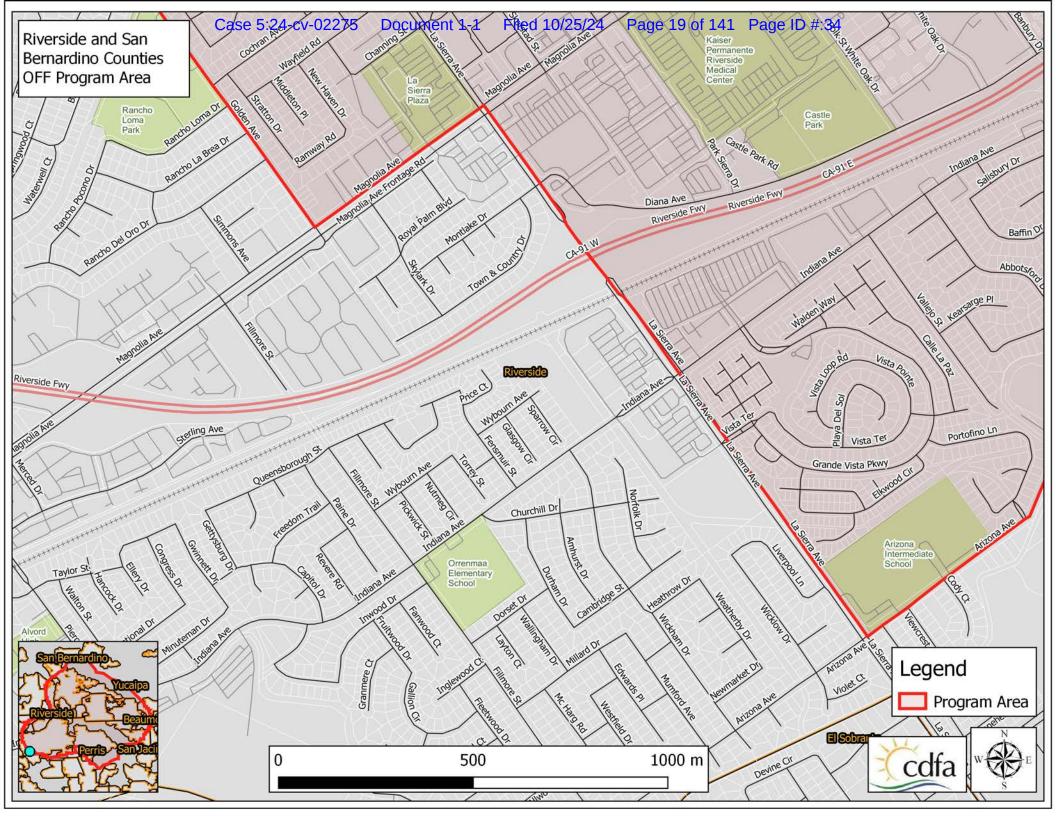












Riverside and San Bernardino Counties OFF Program Area	Case 5:24-cv-02275	Document 1-1 Filed 10/	Page 20 of 141	Page ID #:35	
	Regelting the second seco				Legend Program Area
Rents Sanlad	0	500	1000 m	Boulder Dr	

