

1 PAUL ADAMS, CDCR#F.92755
2 CALIFORNIA CORRECTIONAL INSTITUTION
3 FACILITY (E) WILLARD HALL, 27LOW.
4 P.O. BOX 107
5 TEHACHAPI, CALIF. 93581
6 PLAINTIFF IN PRO SE

FILED
Superior Court Of California
County Of Los Angeles

SEP 02 2016

Sherri R. Carter, Executive Officer/Clerk
By A. C. J., Deputy
A. C. J.

7 SUPERIOR COURT OF CALIFORNIA

8 PAUL ADAMS,
9 PLAINTIFF,

CASE NO.: LC104591

10 VS.

11 MICHAEL GOTTLIEB; MARK LEE INABA;
12 PEGGY FIDERIO; JOHN A. FISHER; KAMALA D. HARRIS;
13 STEVE COOLEY; DOES 1-20.
14 DEFENDANTS

CAUSES OF ACTION

15 Plaintiff PAUL ADAMS alleges as follows:

16 **FIRST CAUSE OF ACTION: FALSE PROBABLE CAUSE**

17 1. On or about May 2006, Office of the District Attorney (STEVE COOLEY) manufactured a false probable cause order, supported by false facts related to, a "COLD HIT MATCH" MADE BY AFIS DATABASE. (THE PEOPLE'S INFORMATION IS FRAUD IN THE INDUCEMENTS.) As AFIS database never made a "COLD HIT MATCH" and fails to exist. The prints that the alleged COLD HIT MATCH made a return on in fact is not a match to PAUL ADAMS; the Plaintiff Contends that, his rights under the U.S. 4th Amendment was fundamentally Violated.

18 In the context that the State Government issued false warrants for arrest and prosecution, as to Probable Cause. Amendment IV [Section 1]: The right of the people to be secure in their persons, houses, papers and effects, against unreasonable searches, seizures, shall not be violated and that **NO WARRANTS SHALL ISSUE, but upon probable cause, supported by OATH OR AFFIRMATION, AND PARTICULARITY DESCRIBING THE place to be searched, and the persons or things to be seized.**

19 Plaintiff's rights as described above were and still are being violated; The Government issued false Probable Cause, supported by Perjured Oath and Affirmation, and facts in support thereof, AFIS COLD HIT MATCH and false prints that "matched Plaintiff." Thereby, issued a Probable Cause, based upon knowing falsehoods, and falsely manufactured Evidence, to secure a false arrest, prosecution, and imprisonment. Probable Cause was, issued under perjury, and fraud in the inducements. Conviction is based upon, impermissible application of the statutes and laws, and false statements.

20 **SECOND CAUSE OF ACTION: VINDICTIVE PROSECUTION**

21 Beginning on May 2006 and ending on April 11, 2007, Office of the District Attorney (STEVE COOLEY), and his team, had fabricated false evidence, and manufactured false testimonies, regarding AFIS database making COLD HIT matches to Plaintiff PAUL ADAMS, were in fact no such evidence exists at all. Convicting Plaintiff for seventeen years wrongfully in prison. Prints were not matched to PAUL ADAMS, and that AFIS database never made and COLD HIT MATCH at all. VIOLATION OF THE DUE PROCESS CLAUSE. 5TH, 6th, AND 14TH Amendments of the Federal Constitution.

1 **THIRD CAUSE OF ACTION:** **LEGAL MALPRACTICE**

2 On or about the years of 2006-2007, Defendant: MICHAEL GOTTLIEB had represented Plaintiff PAUL ADAMS by
3 false pretenses and conspired with the Office of the District Attorney. (STEVE COOLEY) AND HIS ENTIRE TEAM,
4 to wrongfully convict Plaintiff PAUL ADAMS, while concealing evidence of Plaintiff's innocence, and deliberately
5 sabotaging Plaintiff's Defense to aid and abet the District Attorney in Convicting his Client PAUL ADAMS.
6 Violations of the 5th, 6th, and 14th Amendments; MICHAEL GOTTLIEB violated Plaintiff's rights to truth in
7 evidence representation, in which he withheld information that AFIS database returns, did not exist. He also
8 knew that the crime prints did not match Plaintiff and Gottlieb, suppressed that information. GOTTLIEB also
9 knew that the PROBABLE CAUSE for arrest, want, and prosecution were based upon FALSE INFORMATION
10 AND PERJURED AFFIDAVITS. Otherwise, he should have known. MICHAEL GOTTLIEB breached his responsibility
11 as a defense counsel to Plaintiff, by **AIDING AND ABETTING** the District Attorney's Office in bringing about a
12 false conviction. (SEE, FACTS IN CAUSE OF ACTION (1)).

8 **FOURTH CAUSE OF ACTION:** **CONSPIRACY AGAINST CITIZENS RIGHTS**

9 In the years of 2006-2010, and continuing, all of the defendants of the complaint have CONSPIRED AGAINST
10 PLAINTIFF'S CITIZENS RIGHTS IN VIOLATION OF TITLE 18. U.S.C. SECTION 241, AND CALIFORNIA CONSTITUTION
11 ARTICLE I, SECTION 14. By and through the deliberate impermissible application of the statutes and laws, by the
12 manufacturing of false evidence and fabricated testimonies, and fake probable cause, to obtain a knowing false
13 conviction of the factually innocent Citizen of the United States, Plaintiff PAUL ADAMS.

12 **FIFTH CAUSE OF ACTION:** **INVOLUNTARY SERVITUDE**

13 By the scope of the Violations of cause of actions 1, 2, and 3, Plaintiff was made a slave to serve and pay debt
14 not owed, and or such is obtained debt to society IMPRISONMENT by fraud and deceit, and thereby, had
15 wrongly held Plaintiff as a slave involuntarily. In violation of the Laws and Constitutions of California and the
16 United States.

16 **SIXTH CAUSE OF ACTION:** **DENIED LIBERTY**

17 **CALIFORNIA CONSTITUTION ARTICLE 1, Section I, DENIED LIBERTY:** THE DEFENDANTS OF THE COMPLAINT HAVE
18 CONSPIRED AGAINST Plaintiff; with the District Attorney's Office and its witness PEGGY FIDERIO. The (Police
19 Investigator "SID"), presented false evidence (AFIS AND PRINTS.) to the jury and had PEGGY FIDERIO falsely
20 testify, as MARK LEE INABA, falsely argued to the jury false facts in order to convict a knowingly innocent Citizen
21 of the United States. Thereby, implemented false imprisonment by presenting FRAUD TO THE COURT AND JURY
22 in their, "OVERT ACTS" to convict Plaintiff for ill-gotten gain. Additionally, the Defendants of the complaint
23 continued to conspire to maintain the false conviction upon plaintiff PAUL ADAMS, and represented fraud to the
24 courts in the inducements to deprive Plaintiff PAUL ADAMS his freedom. U.S.C.A. Title 18, section 1, **ARTICLE 1**
25 **section I. DENIED RIGHT TO LIBERTY, DUE PROCESS CLAUSE.**

22 **SEVENTH CAUSE OF ACTION:** **DENIED EQUAL PROTECTION OF THE LAWS**

23 **ART I, SEC 7, DENIED EQUAL PROTECTION PURSUANT TO THE 14TH AMENDMENT OF THE UNITED STATES**

24 **CONSTITUTION; As a result and reflection of the above causes of actions, and all the issues relative in the**
25 **body of the complaint.**

26 In addition, had treated Plaintiff differently in similarly situations and was discriminative.

1 **EIGHTH CAUSE OF ACTION: CRUEL AND UNUSUAL PUNISHMENT**

2 All of the defendants have engaged in an "OVERT ACT" to carry out a false conviction, depriving Plaintiff of his
3 Life, liberty and property. A Seventeen -year wrongful prison commitment with a knowing disregard for
4 Plaintiff's freedom rights; Knowing to falsely convict, aid and abet, and to maintain the false conviction amounts
5 to deliberate violations of the Eighth Amendment. EIGHTH AMENDMENT [Section 1]:

6 Excessive bail shall not be requiring, nor excessive fines imposed, **nor cruel and unusual punishments inflicted.**
7 **FALSE IMPRISONMENT IS CRUEL & UNUSUAL PUNISHMENT.**

8 Plaintiff suffers:

- 9 ➤ **Mental and Emotional Anguish;**
 - 10 ➤ **Loss of life, liberty and property;**
 - 11 ➤ **The pursuit of happiness;**
 - 12 ➤ **Freedoms in which are enjoyed by all Citizens of the United States; and,**
 - 13 ➤ **Loss of family, friends, and children; and**
 - 14 ➤ **Rights to Truth in Evidence;**
 - 15 ➤ **To not be falsely convicted and imprisoned; and,**
 - 16 ➤ **The rights to have Governmental Officials like Police and Prosecutors, to follow the due course of law.**
- 17 Thereby, Plaintiff suffered extreme, unjustified, and profound violations of his most fundamental rights.

18 **NINTH CAUSE OF ACTION: FRAUD AND FALSE STATEMENTS**

19 The Government/Defendants of this complaint, engaged in corrupt activity, and represented fraud upon the
20 court, and the jury. False claims, statements, and false inducements., FRAUD AND FALSE STATEMENTS,
21 VIOLATION, TITLE 18 U.S.C. SECTION 1001; CAL. CONST., ART. I, SECTIONS 6 AND 15; AND,

22 **TENTH CAUSE OF ACTION: DISHONOR OF A FINANCIAL STATEMENT**

23 Premised upon the fact that the defendants of the complaint, were adequately noticed of the complaint,
24 presented with charges against them, demands for contestation, opportunity to cure default, and presented
25 with a conditional acceptance for value; the defendants agreed to pay the some demanded in the conditional
26 acceptance for value. By their refusal to contest the complaint, value demanded, and or any part thereof. They
27 then went into a dishonor of said financial instrument, by failing to affix Plaintiff's account from ZERO to the
amount agreed upon by the defendants to Pay. \$210,000,000.00 TWO-HUNDRED AND TEN MILLION DOLLARS,
The amount is a fraction represented for a conditional acceptance for value, by Plaintiff PAUL ADAMS, in return
for the false imprisonment (uncontested by defendants) pursuant to the provisions of TREZAVANT v. TAMPA, in
which the Court awarded \$25,000.00 for every 23 minutes of incarceration, or 1.8 Million dollars a day. THIS
CAUSE OF ACTION IS, BASED UPON THE SCOPE, AND MAGNITUDE OF THE FULL CONTENTS OF THE PLAINTIFF'S,
FIVE AFFIDAVITS IN WHICH OUTLINE THE CAPACITY OF THE ABOVE CAUSE OF ACTION. Thereby, it is, based
upon the Common Law of Torts.

28 **ELEVENTH CAUSE OF ACTION: VIOLATION OF RIGHTS UNDER THE COLOR OF LAW**

29 All the Defendants of the complaint had acted in their individual and official capacities while committing the
30 violations in the complaint against Plaintiff PAUL ADAMS, thereby, engaged in a Conspiracy, THAT RESULTED IN
31 A SEVENTEEN YEAR PRISON SENTENCE IN A PLANNED CONVICTION AGAINST PLAINTIFF PAUL ADAMS, A CITIZEN
32 OF THE UNITED STATES AND CALIFORNIA; U.S.C. TITLE 18. SECTION 242, CALIFORNIA CONSTITUTION ARTICLE I,

33 SECTION 7.

1 **TWELVETH CAUSE OF ACTION: AIDING AND ABETTING**

2 At all times mentioned in the complaint, all defendants are, charged with Aiding and Abetting the OFFICE OF THE
3 DISTRICT ATTORNEY (STEVE COOLEY) in conspiracy to convict PAUL ADAMS., As defined in the facts established
4 in the body of the complaint. The Aiding and Abetting consists of the following: (a) conspiracy to conceal truth in
5 evidence of innocence/exculpatory; (b) Conspiracy to bring about a knowing false conviction by manufacturing
6 false evidence and testimonies; (c) Representing Fraud in the inducements by statements, records, and
7 information and declarations to the Courts to maintain the knowing false imprisonment of PAUL ADAMS; and (d)
8 Failing to step forward to present the truth, and set Plaintiff free of his false imprisonment. This cause also falls
9 under the scope defined as VINDICTIVE PROSECUTION.

7 **ACKNOWLEDGEMENT**

8 At all times mentioned in the complaint, the premise established for the causes of actions reflect within the
9 body of the COMPLAINT AND THE FIVE AFFIDAVITS. (ATTACHED THERETO);

10 These alleged Causes of actions are the magnitude of the violations in which the defendants are charged, and
11 where any new information leads to additional causes of action, Plaintiff PAUL ADAMS, maintains the right to
12 amend the new information into the complaint as information is developed, learned, and or found out.

13 The causes of action are premised upon, the information available to Plaintiff at this time. Moreover, the causes
14 of action are subject to change were the facts and information is more developed during the course of litigation
15 in this case.

16 The remedies sought in the complaint, reflect in "PRAYER FOR RELIEF." Therefore, are also subject to change as
17 it is deemed, appropriate depending upon the information and evidence that is developed in the course of
18 litigation.

19 THE PRAYER FOR RELIEF IS AS FOLLOWS:

- 20 ➤ VACATE THE FALSE IMPRISONMENT FREEING PLAINTIFF OF THE FALSE CHARGES, AND EXPUNGING THE
21 ENTIRE RECORD AS IF PLAINTIFF HAD NEVER BEEN ARRESTED, CHARGED, AND CONVICTED;
- 22 ➤ AWARD PLAINTIFF THE DAMAGE AWARD OF \$5,000,000.00 FIVE MILLION DOLLARS FOR COMPENSATORY
23 DAMAGES CALCULATED AT \$500,000.00 FIVE-HUNDERED THOUSAND DOLLARS A YEAR FOR THE SMOUNT
24 OF TEN YEARS SO FAR.
- 25 ➤ ORDER THE DEFENDANTS OF THE FIVE AFFIDAVITS TO HONOR THEIR AGREEMENT TO PAY THE AMOUNT OF
26 \$210,000,000.00 TWOHUNDERED AND TEN MILLION DOLLARS, AS A PUNITIVE DAMAGE;

27 (d)

- 1 > DECLATORY JUDGMENT IN WHICH PRESENTS THE DEFENDANTS FOUND GUILTY, HAVE ENGAGED IN
2 CRIMINAL CONSPIRACY, AND ILLEGAL AIDING AND ABETTING, TO DEFRAUD GOVERNMENT IN THE
3 INDUCEMENTS IN WHICH WAS FOR ILL-GOTTEN GAIN;
- 4 > ANY OTHER RELIEF DEEMED APPROPRIATE BY THE JUDGE, JURY OR BOTH.
- 5 > TRIAL DATE APPOINTED AS SOON AS POSSIBLE;
- 6 > APPOINTMENT OF COUNSEL TO REPRESENT THE CASE PURSUANT TO THE PROVISION OF LAW; and,
- 7 > JUDICIAL NOTICE OF PLAINTIFF'S, EXONERATION EXHIBIT-[1]; AND THE FIVE AFFIDAVITS, OF THIS
8 COMPLAINT.

9 Plaintiff contends that his rights have been, violated in that the defendants of the complaint impermissibly
10 misappropriated the Statutes, Laws and Constitutions, in order to fabricate a false conviction for ill-gotten gain.
11 It is evident upon the scope and magnitude of the information firmly established in the complaint that the
12 defendants have performed such practice in numerous cases. And that it is adequate to declare that these
13 defendants of the complaint pose an unreasonable risk to society, and aim to deliberately pervert the integrity
14 of justice, were their actions and omissions reflect that they use their Color of Authority to achieve ill-gotten
15 gain. For these reasons, Plaintiff seeks the damages, and relief sought in the complaint. As the defendants
16 actions are with a deliberate plot, plan, and procedural process that they have developed among themselves to
17 falsely convict innocent citizens, and to silence their cries for justice by stonewalling their complaints and
18 presentations where information and evidence is presented that exonerates the wrongfully accused.
19 The defendants conduct herein this complaint are evidence of immoral turpitude, with a deliberate aim to
20 prevail in their OVERT ACTS to convict at all costs, guilty or not. By fabrication of false evidence, and tailoring
21 false testimonies, and using immoral and unethical prosecutorial tactics in which is Criminal, and improper for
22 Governmental Officials, that are under OATH OF OFFICE to uphold the laws, and constitutions.
23 The evidence is indisputable; Plaintiff was convicted with nonexistent evidence and fabricated testimonies to
24 bring about a false conviction. Only because Plaintiff fit the profile and the defendants created a policy among
25 themselves that convict at all costs for the ILL-GOTTEN GAIN.