

1 MICHAEL D. KOLODZI (CAL. BAR NO. 255772)
THE KOLODZI LAW FIRM
2 433 North Camden Drive, Suite 600
3 Beverly Hills, California 90210
4 Telephone: 310.279.5212
5 Facsimile: 866.571.6094
6 Email: mdk@mdklawfirm.com
7 *Counsel for Plaintiff*

8 LARRY E. KLAYMAN (D.C. BAR NO. 334581)
9 KLAYMAN LAW GROUP, PA
10 2020 Pennsylvania Avenue NW, Suite 800
11 Washington, DC 20006
12 Telephone: 561.558.5536
13 Email: leklayman@gmail.com
14 *Of Counsel*

15 **IN THE UNITED STATES DISTRICT COURT**
16 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

17 KIARA ROBLES, an individual
18 Oakland, CA

19 Plaintiff,

20 v.

21 IAN DABNEY MILLER, an individual and
22 member of ANTIFA
23 Oakland, CA

24 and

25 RAHA MIRABDAL a.k.a. Shadi Banoo, an
26 individual and member of ANTIFA
27 Berkeley, CA

28 and

JOHN DOES 1-20, et al.

Defendants.

Case No.: 1:17-4864-CW

SECOND AMENDED COMPLAINT

DEMAND FOR JURY TRIAL

I. INTRODUCTION

Plaintiff Kiara Robles (“Plaintiff” and/or “Robles”) brings this complaint against Defendant Ian Dabney Miller (“Miller”) and Defendant Raha Mirabdal (“Mirabdal”) and John Does 1-20 for assault, battery, and violations of the Bane Act.

Plaintiff Robles is a resident of Oakland, California. On February 1, 2017, Plaintiff

1 Robles attended a speech by Milo Yiannopoulos, a media personality and political commentator,
2 hosted on the UC Berkeley campus. On the day of Milo Yiannopoulos' speech, however, over
3 1,500 "protestors" gathered at UC Berkeley's Sproul Plaza and the "protestors" erupted into
4 violence just fifteen minutes after Plaintiff Robles' arrival onto the UC Berkeley campus. The
5 violence was, planned, orchestrated, and carried out by Defendants Miller, Mirabdal, and Does
6 1-20, all of whom were members of ANTIFA. Several people, including Plaintiff Robles, were
7 intentionally and violently attacked by both masked and unmasked defendant assailants,
8 including Miller and Mirabdal, and the UC Berkeley campus incurred over \$100,000 worth of
9 damage. Plaintiff Robles was attacked with extremely painful pepper spray and bear mace by
10 masked assailants amongst the "protestors" because she chose to exercise her right to freedom of
11 speech and show support for the planned speaker, Milo Yiannopoulos. She was also intentionally
12 beaten with flagpoles by Defendant Miller. All of these attacks were carried out after she was
13 incapacitated by Defendant Mirabdal, who shined blinding light directly into her eyes. As a
14 direct and proximate result of these actions, Plaintiff has suffered severe injuries, for which she
15 now brings suit.

16 **II. JURISDICTION AND VENUE**

17 1. This Court has subject matter jurisdiction over this case pursuant to 28 U.S.C. §
18 1331 (Federal Question Jurisdiction).

19 2. This Court has supplemental jurisdiction over this case pursuant to 28 U.S.C. §
20 1367.

21 3. Venue is proper pursuant to 18 U.S.C. § 1965 and 28 U.S.C. § 1391(b)(2), (3) in
22 that Defendants reside here and are subject to personal jurisdiction in this District.

23 **III. PARTIES**

24 4. Plaintiff Kiara Robles ("Plaintiff Robles") is an individual, a natural person, who
25 at all material times was a citizen and resident of California.

26 5. Defendant Ian Dabney Miller ("Miller") is a former (and possibly current) UC
27 Berkeley employee that protested the UC Berkeley Milo Yiannopolous event. Defendant Miller
28

1 is a member of the non-profit organization ANTIFA. He is being sued in his personal capacity
2 and in his official capacity, where applicable.

3 6. Defendant Raha Mirabdal (“Mirabdal”) is a former UC Davis employee that
4 protested the UC Berkeley Milo Yiannopolous event. Defendant Mirabdal is a member of the
5 non-profit organization ANTIFA. She is being sued in her personal capacity.

6 7. Does 1-20 are ANTIFA members who violently assaulted and battered Plaintiff
7 during the Yiannopolous event who are to this point unidentified, but will be identified in
8 discovery.

9 **IV. STANDING**

10 8. Plaintiff Robles has standing to bring this action because she has been directly
11 affected and victimized by the unlawful conduct complained herein. Her injuries are proximately
12 related to the conduct of Defendants, jointly and severally.

14 **V. FACTS**

15 **Defendants Worked in Concert to Deprive Plaintiff of Her First Amendment Rights**

16 9. Defendants—in concert with each and every named Defendant, jointly and
17 severally—have worked in concert to deny numerous individuals who attended the Milo
18 Yiannopolous event, including Plaintiff Robles, their constitutional right to freedom of speech
19 and freedom of assembly, as guaranteed by the First Amendment to the U.S. Constitution.

20 10. Defendants Mirabdal, Miller, and Does 1-20 (“ANTIFA Defendants”) are all
21 members of ANTIFA, an extremely violent organization that routinely uses deadly force under
22 the guise of “protests” to further their causes.

23 11. The ANTIFA Defendants organized, plotted, planned, and executed the violent
24 shutdown of the Milo Yiannopolous event. Members of ANTIFA, including Defendants Miller
25 and Mirabdal rioted at the Milo Yiannopolous event and viciously attacked attendees, including
26 Plaintiff Robles, because of their political beliefs, sex, and sexual preference, such as Plaintiff
27 Kiara Robles’. On information and belief, ANTIFA acted under the direction of, and in concert
28 with, each and every named Defendant jointly and severally.

1 12. It has been widely reported that ANTIFA, and the ANTIFA Defendants, were
2 responsible for the violent riots at the Yiannopolous event.¹ The New York Times reported that
3 “Anti-fascists, or antifa, clad like ninjas and hellbent on silencing a speaker (the provocateur
4 Milo Yiannopoulos), smashed windows and set fires.”²

5 13. Anyone who was at the Yiannopolous event was either there to support him
6 and/or listen to Yiannopolous speak, like Plaintiff, or a member of ANTIFA there to shut down
7 the Yiannopolous event using deadly violent force.

8 14. ANTIFA is known for using violence and inciting violence to achieve their
9 objectives.

10 15. ANTIFA has threatened, encouraged violence, and committed violent acts against
11 Plaintiff Robles and other peaceful protestors like her that share political views that ANTIFA
12 does not agree with.

13 16. The twitter account for San Francisco ANTIFA has made such statements as,
14 “There’s no better feeling than an #Antifa comrade helping you sucker punch people because
15 doing it one on one can be scary!”³ and “The Nazis found our comrade who hit a Trump
16 supporter in the head with a U-lock”⁴, referring to an incident where an ANTIFA protestor was
17 charged with assault with a deadly weapon at a Berkeley free speech rally .

18 17. The San Francisco ANTIFA twitter account has also retweeted videos of
19 ANTIFA members throwing explosives⁵ and violently kicking public property⁶ during a
20 Berkeley protest.

21 18. Thus, each of the ANTIFA Defendants are equally, jointly, and severally liable
22 for each others’ actions, as they were all performed in concert, and as part of their conspiracy to

23 ¹ Carlo David, Frances Dinkelspiel, *Chaos erupts, protesters shut down Yiannopoulos events,*
24 *banks in downtown vandalized*, Berkeleyside, Feb. 2, 2017, available at:
[https://www.berkeleyside.com/2017/02/02/chaos-erupts-protesters-shut-yiannopolous-events-](https://www.berkeleyside.com/2017/02/02/chaos-erupts-protesters-shut-yiannopolous-events-banks-downtown-vandalized)
[banks-downtown-vandalized](https://www.berkeleyside.com/2017/02/02/chaos-erupts-protesters-shut-yiannopolous-events-banks-downtown-vandalized).

25 ² Andrew Beale, Sonner Kehrt, *Behind Berkeley’s Semester of Hate*, Aug. 4, 2017, New York
26 Times, available at: [https://www.nytimes.com/2017/08/04/education/edlife/antifa-collective-](https://www.nytimes.com/2017/08/04/education/edlife/antifa-collective-university-california-berkeley.html)
[university-california-berkeley.html](https://www.nytimes.com/2017/08/04/education/edlife/antifa-collective-university-california-berkeley.html).(emphasis added).

27 ³ @SFAntifa.

27 ⁴ @SFAntifa.

28 ⁵ @SFAntifa.

28 ⁶ @SFAntifa.

1 violently shut down the Yiannopolous event using, among other dangerous objects, pepper spray
2 and bear mace, flag poles, signs, and flashlights.

3 19. ANTIFA receives funds from umbrella companies and subsidiaries of Soros'
4 Open Society Foundation, a network of foundations, partners, and projects that funds George
5 Soros' ("Soros") political interests.

6 20. The group ANTIFA is sponsored by Alliance for Global Justice ("AGJ").⁷ Soros
7 is a major backer of AGJ, as AGJ receives grants from Soros' foundation, the Open Society
8 Institute.⁸ In addition, the Tides Foundation, a non-profit funded by Soros, contributes money to
9 AGJ.

10 21. As a result of each and every Defendants' conduct, Plaintiff Robles was deprived
11 of her constitutional right to freedom of speech and freedom of assembly in support of Milo
12 Yiannopolous and discriminated against based on sex and sexual preference.

13 22. It is clear that the shutdown of the Yiannopolous event was the intention of the
14 ANTIFA Defendants, as they carefully planned, orchestrated, and carried out this attack at the
15 exact moment that the Yiannopolous event was to take place, knowing full well that if the event
16 turned into a violent rampage with Yiannopolous supporters being beaten with deadly weapons,
17 there was no possible way that the Yiannopolous event could proceed as planned in the interest
18 of public safety.

19 23. The ANTIFA Defendants achieved their goal to shut down the Yiannopolous
20 event, as the event was officially cancelled around 6:15 p.m., about 20 minutes after Defendants
21 Mirabdal, Miller, and Does 1-20 began their vicious riot and attack on Plaintiff and other
22 Yiannopolous supporters.⁹

23 ///

24 _____
25 ⁷ <https://refusefascism.org/donate/>

26 ⁸ *The Alliance for Global Justice*, Group Snoop, available at:
27 <http://www.groupsnoop.org/The+Alliance+for+Global+Justice>.

28 ⁹ Carlo David, Frances Dinkelspiel, *Chaos erupts, protesters shut down Yiannopoulos events, banks in downtown vandalized*, Berkeleyside, Feb. 2, 2017, available at:
<https://www.berkeleyside.com/2017/02/02/chaos-erupts-protesters-shut-yiannopoulos-events-banks-downtown-vandalized>.

Facts Pertaining Directly to Plaintiff Robles' Injuries

1
2 24. On February 1, 2017, Plaintiff Robles planned to attend a speech by Milo
3 Yiannopoulos, a media personality and political commentator, hosted on UC Berkeley campus.

4 25. Mr. Yiannopoulos was invited to speak by the Berkeley College Republicans,
5 which is a UC Berkeley Registered Student Organization ("RSO").

6 26. Plaintiff Robles purchased a ticket to the event and the proceeds of the ticket sale
7 went to the Berkeley College Republicans.

8 27. Over 1,500 "protestors," including the ANTIFA Defendants gathered at Sproul
9 Plaza to picket the event. Several people were intentionally and violently attacked by both
10 masked and unmasked assailants, and the UC Berkeley campus incurred over \$100,000 worth of
11 damage.

12 28. The violence was orchestrated by the ANTIFA Defendants in an effort to disrupt
13 the Milo Yiannopolous event.

14 29. Plaintiff Robles was being interviewed by news station KGO-TV about her
15 thoughts on freedom of speech versus "hate speech" when she was approached by several
16 protestors that began to yell that she was a "fascist." The "protestors" surrounded Plaintiff
17 Robles violently and combatively.

18 30. Soon thereafter, an unknown assailant, Doe 1, sprayed Plaintiff Robles in the face
19 with painful pepper spray. Shortly after Plaintiff Robles was sprayed with pepper spray, Plaintiff
20 Robles was again sprayed in the face by an unknown assailant, Doe 2, with bear mace, which
21 contains a much higher concentration of harmful substances than standard pepper spray.

22 31. Doe 1 and Doe 2 were undoubtedly members of ANTIFA, and were acting in
23 concert, jointly and severally, with Defendants Mirabdal and Miller.

24 32. Defendants Mirabdal and Miller knew that Does 1-2 were going to intentionally
25 pepper spray and bear mace the Yiannopoulos supporters, including Plaintiff Robles, and they
26 knowingly and willingly participated in the acted in concert, jointly and severally, with each and
27 every Defendant, to execute carefully calculated a plan of attack to inflict maximum physical
28 pain to Plaintiff Robles and the other Yiannopoulos supporters.

1 33. Soon after the first incident, Plaintiff Robles and others were again physically
2 attacked by protestors. Miller and Does 1-20, intentionally and willfully struck Plaintiff Robles
3 in the face and body with flagpoles until Plaintiff Robles was forced to escape by jumping over a
4 metal barrier.

5 34. Defendants Mirabdal and Does 1-20 knew that Defendant Miller and others were
6 going to intentionally beat Yiannopoulos supporters with flagpoles, including Plaintiff Robles,
7 and they knowingly and willingly participated, in concert, jointly and severally, with each and
8 every ANTIFA Defendant, to execute carefully calculated a plan of attack to inflict maximum
9 physical pain to Plaintiff Robles and the other Yiannopoulos supporters.

10 35. Miller is a former, and possibly current, UC Berkeley employee.¹⁰

11 36. Miller is a member of a radical American, left wing, anti-Trump, non-profit
12 organization funded by Soros, ANTIFA, and carried out the battery on Plaintiff Robles at the
13 direction of ANTIFA and in concert with each and every Defendant.

14 37. Miller admitted that he was present at the Milo Yiannopoulos event in an
15 interview with the New York Daily News.¹¹

16 38. Miller wore a mask to hide his identity and wielded a wooden weapon during the
17 Milo Yiannopoulos event.¹² He was identified later by the particular tattoos on his neck.¹³

18 39. On the day of the UC Berkeley riot, Miller boasted on his social media account
19 that he physically beat Trump supporters at the Milo Yiannopoulos event.¹⁴

20 40. Miller posted a photo of one his incapacitated victims on his social media
21 account.¹⁵

22 _____
23 ¹⁰ University of California Data Analysis - Browse UC Salary Data, available at:
http://ucpay.globl.org/index.php?campus=BERKELEY&name=MILLER+_+IAN+DABNEY

24 ¹¹ Chris Sommerfeldt, *Violent protests at Berkeley college prompt cancellation of speech by*
right-wing writer Milo Yiannopoulos, New York Daily News, February 2, 2017, available at:
25 [http://www.nydailynews.com/news/national/protests-prompt-cancellation-calif-college-wing-](http://www.nydailynews.com/news/national/protests-prompt-cancellation-calif-college-wing-event-article-1.2962069)
[event-article-1.2962069](http://www.nydailynews.com/news/national/protests-prompt-cancellation-calif-college-wing-event-article-1.2962069).

26 ¹² <https://twitter.com/chillum/status/827655032665473024>

27 ¹³ *Id.*

28 ¹⁴ Ethan Ralph, *FIRST ON TRR: A UC Berkeley Rioter Has Been Exposed, & He's a University*
Staff Member!, The Ralph Retort, February 3, 2017, available at: [http://theralphretort.com/uc-](http://theralphretort.com/uc-berkeley-rioter-exposed-works-university-203017/)
[berkeley-rioter-exposed-works-university-203017/](http://theralphretort.com/uc-berkeley-rioter-exposed-works-university-203017/).

¹⁵ *Id.*

1 41. Mirabdal was also present at the Milo Yiannopoulos event.¹⁶

2 42. Mirabdal is a member of the radical American, left wing, anti-Trump, non-profit
3 organization funded by Soros, ANTIFA, and carried out the assault on Plaintiff Robles at the
4 direction of ANTIFA and in concert with each and every Defendant.

5 43. Mirabdal was, at all material times, walking alongside her fellow ANTIFA
6 protestors and engaging in the same violent conduct as her fellow ANTIFA protestors.

7 44. Mirabdal personally and intentionally beat peaceful Milo Yiannopolous
8 supporters with a wooden sign post during the UC Berkeley riot, which is the same thing that
9 fellow ANTIFA member Miller did.¹⁷

10 45. Mirabdal was clearly a member of ANTIFA and furthering ANTIFA interests
11 along with he co-Defendants because she (1) was present at the Yiannopolous event, (2) was not
12 there to support Yiannopolous and/or listen to him speak, (3) was surrounded at all material
13 times by her fellow ANTIFA members who were engaging in violent conduct towards
14 Yiannopolous supporters, (4) personally and knowingly engaged in violent conduct towards
15 Yiannopolous supporters, (5) personally and knowingly incapacitated Plaintiff with a flashlight
16 so that the persons she was with, fellow ANTIFA members, could attack Plaintiff.

17 46. After Mirabdal and several unknown assailants, Does 1-20, surrounded Plaintiff
18 Robles combatively, Mirabdal shined a flashlight aggressively in Plaintiff Robles' face, blinding
19 Plaintiff Robles and placing her in fear and apprehension of harm.

20 47. Mirabdal was shining flashlights in Yiannopoulos supporters' eyes in order to
21 incapacitate them, so that her fellow ANTIFA members, including Defendants Miller and Does
22 1-20, could physically assault Yiannopoulos supporters, including Plaintiff Robles, with pepper
23 spray, bear mace, and flag poles.

24 48. As a direct and proximate result of the pepper spray, bear mace, and bright light
25 all being directed at her eyes by the ANTIFA Defendants, Plaintiff Robles has suffered
26 significant trauma and injury to her eyes.

27 _____
28 ¹⁶ <https://pbs.twimg.com/media/C3vodrJWIAAYQ0h.jpg>

¹⁷ <https://www.instagram.com/p/BQAFESPj1aM/>

1 49. As a direct and proximate result of being beaten with flagpoles by the ANTIFA
2 Defendants, Plaintiff Robles suffered significant injuries to her body.

3 **FIRST CAUSE OF ACTION**

4 ***Violation of State Protected Right Under Cal. Civ. Code § 52.1 – Bane Act***
5 ***Against Defendants Mirabdal, Miller, and Does 1-20***

6 50. Plaintiff Robles repeats and re-alleges all of the previous allegations of the
7 entirety of this Complaint, including, but not limited to, the Introduction, with the same force and
8 effect, as if fully set forth herein again at length.

9 51. Defendants, each and every one of them, acting in concert, jointly and severally,
10 intentionally interfered with Plaintiff Robles’ federally protected right to freedom of speech and
11 freedom of assembly under the First Amendment to the Constitution by threatening and
12 intentionally committing violent acts.

13 52. Plaintiff Robles reasonably believed that if she exercised her rights to freedom of
14 speech and freedom of assembly, Defendants, each and every one of them, acting in concert,
15 jointly and severally, would commit violence against her.

16 53. Defendants, each and every one of them, acting in concert, jointly and severally,
17 injured Plaintiff Robles to prevent her from exercising her rights to freedom of speech and
18 freedom of assembly and/or retaliate against Plaintiff Robles for having exercised her rights to
19 freedom of speech and freedom of assembly.

20 54. The ANTIFA Defendants organized, plotted, planned, and executed the violent
21 shutdown of the Milo Yiannopoulos event. Members of ANTIFA, including Defendants Miller
22 and Mirabdal rioted at the Milo Yiannopolous event and viciously attacked attendees, including
23 Plaintiff Robles, because of their political beliefs, sex, and sexual preference, such as Plaintiff
24 Kiara Robles’. On information and belief, ANTIFA acted under the direction of, and in concert
25 with, each and every named Defendant jointly and severally.

26 55. Thus, each of the ANTIFA Defendants are equally, jointly, and severally liable
27 for each others’ actions, as they were all performed in concert, and as part of their conspiracy to
28 violently shut down the Yiannopolous event using, among other dangerous objects, pepper spray
and bear mace, flag poles, signs, and flashlights.

1 56. Defendants, each and every one of them, acting in concert, jointly and severally,
2 threatened and intentionally committed violent acts against Plaintiff Robles because of Plaintiff
3 Robles' political affiliation, sexual orientation, and gender.

4 57. Plaintiff Robles was harmed, and Defendants, each and every one of them, acting
5 in concert, jointly and severally, were a substantial factor in causing Plaintiff Robles' harm.

6 **SECOND CAUSE OF ACTION**
7 **ASSAULT**

8 ***Against Defendants Ian Dabney Miller and John Does 1-20***

9 58. Plaintiff Robles repeats and re-alleges all of the previous allegations of the
10 entirety of this Complaint, including, but not limited to, the Introduction, with the same force and
11 effect, as if fully set forth herein again at length.

12 59. The ANTIFA Defendants, acting in concert, jointly and severally, placed Plaintiff
13 Robles in apprehension of an imminent harmful or offensive contact by, among other things,
14 aggressively shining a flashlight directly into her eyes so as to blind her after intentionally
15 surrounding her in a combative manner.

16 60. The ANTIFA Defendants, acting in concert, jointly and severally, placed Plaintiff
17 Robles in apprehension of an imminent harmful or offensive contact by, among other things,
18 threatening to intentionally beat her with flagpoles.

19 61. The ANTIFA Defendants organized, plotted, planned, and executed the violent
20 shutdown of the Milo Yiannopolous event. Members of ANTIFA, including Defendants Miller
21 and Mirabdal rioted at the Milo Yiannopolous event and viciously attacked attendees, including
22 Plaintiff Robles, because of their political beliefs, sex, and sexual preference, such as Plaintiff
23 Kiara Robles'. On information and belief, ANTIFA acted under the direction of, and in concert
24 with, each and every named Defendant jointly and severally.

25 62. Thus, each of the ANTIFA Defendants are equally, jointly, and severally liable
26 for each others' actions, as they were all performed in concert, and as part of their conspiracy to
27 violently shut down the Yiannopolous event using, among other dangerous objects, pepper spray
28 and bear mace, flag poles, signs, and flashlights.

1 63. Plaintiff Robles was indeed beaten with flagpoles and sprayed with pepper spray
2 and bear mace.

3 64. Plaintiff Robles did not consent to the ANTIFA Defendants' conduct described in
4 the foregoing paragraphs.

5 65. As a direct and proximate result of the ANTIFA Defendants' wrongful conduct,
6 Plaintiff Robles suffered conscious pain, suffering, severe emotional distress and the fear of
7 imminent serious bodily injury or death, and other mental and physical injuries.

8 **THIRD CAUSE OF ACTION**
9 **BATTERY**

10 ***Against Defendants Ian Dabney Miller and John Does 1-20***

11 66. Plaintiff Robles repeats and re-alleges all of the previous allegations of the
12 entirety of this Complaint, including, but not limited to, the Introduction, with the same force and
13 effect, as if fully set forth herein again at length.

14 67. Plaintiff Robles suffered harmful, offensive bodily contact from the ANTIFA
15 Defendants' actions of beating Plaintiff's face and body with flag poles and flashlights and
16 spraying her with pepper spray and bear mace, from which Plaintiff sustained significant injuries

17 68. The ANTIFA Defendants beat Plaintiff Robles' face and body with flag poles and
18 flashlights and sprayed her with pepper spray and bear mace with the intent to harm and injure
19 her.

20 69. Plaintiff Robles did not consent to the ANTIFA Defendants' attacks with pepper
21 spray, bear mace, flag poles, and flashlight on her face and body, and she was harmed and
22 injured by Defendants' intentional attacks.

23 70. The ANTIFA Defendants organized, plotted, planned, and executed the violent
24 shutdown of the Milo Yiannopoulos event. Members of ANTIFA, including Defendants Miller
25 and Mirabdal rioted at the Milo Yiannopolous event and viciously attacked attendees, including
26 Plaintiff Robles, because of their political beliefs, sex, and sexual preference, such as Plaintiff
27 Kiara Robles'. On information and belief, ANTIFA acted under the direction of, and in concert
28 with, each and every named Defendant jointly and severally.

1 71. Thus, each of the ANTIFA Defendants are equally, jointly, and severally liable
2 for each others' actions, as they were all performed in concert, and as part of their conspiracy to
3 violently shut down the Yiannopolous event using, among other dangerous objects, pepper spray
4 and bear mace, flag poles, signs, and flashlights.

5 72. As a direct and proximate result of the wrongful attacks on Plaintiff Robles, by
6 the ANTIFA Defendants, Plaintiff suffered conscious pain, suffering, severe emotional distress
7 and the fear of imminent, serious bodily injury or death, and other mental and physical injuries.

8 **PRAYER FOR RELIEF**

9 WHEREFORE, Plaintiff Robles prays for relief and judgment against Defendants,
10 jointly and severally, as follows:

- 11 (a) For general (non-economic), special (economic), actual and compensatory
12 damages in excess of \$3,000,000;
- 13 (b) For punitive damages in excess of \$20,000,000;
- 14 (c) For equitable, declaratory, and injunctive relief as the Court deems proper; and
- 15 (d) For such other relief as the court may deem just and proper.

16 **DEMAND FOR JURY TRIAL**

17 Plaintiff demands a trial by jury on all counts, as to all issues so triable.

18 DATED: October 5, 2018

19 Respectfully submitted,

20 //Michael D. Kolodzi

21 Michael D. Kolodzi

22 THE KOLODZI LAW FIRM

433 North Camden Drive, Suite 600

Beverly Hills, California 90210

Telephone: 310.279.5212

Facsimile: 866.571.6094

Email: mdk@mdklawfirm.com

Counsel for Plaintiff

25 Larry Klayman, Esq.

26 FREEDOM WATCH. INC.

2020 Pennsylvania Ave N.W. #345

Washington, D.C. 20006

27 Tel: (561) 558-5336

Email: leklayman@gmail.com

28 *Of Counsel*