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6 Attorneys for Plaintiffs,

7 PEOPLE OF THE STATE OF CALIFORNIA

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF SACRAMENTO

10 People of the State of California, )

Case No.

11 Plaintiffs, )

**COMPLAINT FOR:**

12 v. )

1) Public Nuisance

13 )

2) Private Nuisance

14 CITY OF SACRAMENTO and DOES 1 )

3) Inverse Condemnation

15 through 100, inclusive, )

(Govt. Code Section 6103)

16 )

17 Defendants. )

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1 Plaintiff, THE PEOPLE OF THE STATE OF CALIFORNIA hereby file this Complaint  
2 against defendant City of Sacramento (the “City”) and Does 1 through 100, inclusive, as  
3 follows:

4 1. In the last 7 years, Sacramento’s unhoused population has exploded by over 250%.  
5 There are more homeless people in Sacramento than San Francisco. Our community is at a  
6 breaking point. We have an unhoused population living in conditions typical of Third World  
7 countries. And we have the rest of the community stuck between compassion and chaos.

8 2. On June 29, 2023, the Presiding Judge of the Superior Court, the Honorable  
9 Michael Bowman, sent the City of Sacramento a letter describing safety concerns that affected  
10 equal access to justice.

11 3. Judge Bowman wrote, “These daily incidents include, but are not limited to,  
12 physical and verbal assault, public sex acts, open fires, nudity, urinating and defecating on  
13 walkways. When coming to court is a trial itself for victims, witness or even jurors – access to  
14 justice is threatened. So, too, is public service when our employees’ fear for their own safety  
15 prevents them from leaving our buildings to go for a walk or supporting local businesses by  
16 having lunch with a colleague or shopping the farmer’s market.”

17 4. The primary mandate of the District Attorney is to ensure public safety for all  
18 while balancing the equal administration of justice.

19 5. Consistent with this mandate, on June 30, 2023, Sacramento County District  
20 Attorney Thien Ho sent the City of Sacramento a letter regarding the public safety crisis  
21 downtown affecting access to justice (See Exhibit 1).

22 6. District Attorney Ho wrote, “People are entitled to the fundamental right of fair  
23 and equal access to justice. But to obtain justice, members of our community require unfettered  
24 access to the Courthouse and the District Attorney's Office without threats to their safety or well-  
25 being. Unfortunately, this is not the experience for those having to navigate the city blocks  
26 surrounding the courthouse. Every day, people encounter growing unhoused encampments with  
27 open air drug use and dealing, tents blocking sidewalk access, unhoused individuals engaged in  
28 erratic and violent behavior – all within the three-block area that encompasses the Courthouse,

1 the District Attorney's Office, and Sacramento City Hall.”

2 7. District Attorney Ho described numerous incidents where District Attorney  
3 employees were assaulted and threatened. He asked the City to help get the unhoused off the  
4 streets and into shelters.

5 8. Mayor Darrell Steinberg responded and said, “The presiding judge and the district  
6 attorney are right. I’m working with the City Manager to open up the Miller Park Safe Camping  
7 no later than two weeks from now.”

8 9. That was almost 3 months ago, and since then things have only worsened. A court  
9 reporter was assaulted, another DA employee was threatened, and a woman was sexually harassed  
10 and forced to hide in the bathroom of the G Street Café. The community remains trapped in this  
11 “Groundhog Day” loop that keeps repeating itself where nothing changes, and nothing improves.

12 10. Past approaches by the City to address the unhoused crisis have failed. The  
13 community cannot stand idly by while lawless zones that promote crime erode the well-being of  
14 our community for those who live and work here.

15 11. On July 18, 2023, the Sacramento County District Attorney’s Office asked people  
16 to complete a survey regarding 16 major encampments within the City. As part of the survey,  
17 people were asked to describe how these encampments and the City’s actions have impacted their  
18 quality of life.

19 12. The District Attorney’s Office received nearly 3,000 responses. Many of the  
20 responses were disturbing and appalling. Residents reported they were assaulted at gunpoint by  
21 an unhoused individual; a girls’ soccer game was postponed because of hypodermic needles on  
22 the field; a homeowner was diagnosed with PTSD due to the constant harassment and break-ins  
23 by unhoused people living in an encampment across the street from her home; children have had  
24 to walk through human feces and urine to get to school.

25 13. Some respondents said their calls to the City for help had gone unanswered.  
26 Additional respondents received comments from elected leaders chastising them for seeking help  
27 and directed them to “be thankful” for being housed. Some who called 311 to request help were  
28 told to stop calling. After receiving these heart wrenching responses, District Attorney Ho sent

1 the City of Sacramento a letter (See Exhibit 2) asking the City to:

- 2 • Consistently enforce city ordinances such as sidewalk obstructions, unlawful  
3 storage, unlawful dumping, unlawful fires and unlawful camping;
- 4 • Create professionally operated Safe Ground sites;
- 5 • The City only allows camping at night on the grounds of City Hall but prohibits  
6 any camping during the day. District Attorney Ho asked the City to extend that  
7 same protection that they give to themselves to the rest of the City;
- 8 • Share real time data on shelter bed availability with all partners, including law  
9 enforcement;
- 10 • Complete an audit of the millions that have been spent on the unhoused crisis with  
11 a true accounting of which programs work. The city has been planning an audit for  
12 two years with nothing to show.

13 14. To date, the City has not accepted or fully implemented any of these proposals.

14 They haven't even provided a timeline on a single item.

15 15. The unhoused deserve to feel and be safe. Among the chronically homeless, those  
16 who have been unhoused for over a year, 9 out of 10 women have been victims of sexual assault.

17 16. During the recent heat wave in the summer of 2023, unhoused people  
18 were seen walking on the sizzling sidewalk barefoot. During the cold winter months of 2022,  
19 unhoused people were seen wrapped in blankets standing in the pouring rain.

20 17. It's not compassionate to let someone die in the sweltering summer sun or freeze  
21 to death in the cold winter night. It's not compassionate to allow unsafe conditions to fester so  
22 badly that a 14-year old boy cannot ride his bike to school or a group of little girls can't play  
23 soccer on a field littered with needles. It's not compassionate when someone in a wheelchair  
24 cannot use a sidewalk blocked by tents or a small business is forced to close forever due to  
25 repeated broken windows and vandalism.

26 18. In the midst of this spiraling descent into decay and this utter collapse into chaos,  
27 the City of Sacramento has failed to consistently enforce the law.

28

1           19.     The City instead chose to enforce some of the laws only some of the time against  
2 some of the people.

3           20.     Selective enforcement erodes public safety, enables lawlessness, and represents  
4 missed opportunities at intervention to encourage mental and substance abuse treatment.

5           21.     Among the chronically unhoused, 8 out of 10 suffer from mental health disorders  
6 or drug addictions. They present the most public safety issues for themselves and the rest of the  
7 community. They are the most treatment resistant in the unhoused population.

8           22.     Homelessness is a complex crisis that must be addressed with short term, mid-  
9 term, and long-term solutions.

10          23.     Long-term, Governor Gavin Newsom’s initiative to build 10,000 additional mental  
11 health beds is an important step at addressing the unhoused crisis in California. Efforts to expand  
12 conservatorship laws to include those suffering from substance abuse disorder will also assist in  
13 providing required treatment.

14          24.     Mid-term, programs such as the Sacramento County District Attorney’s CORE  
15 program, which offers individuals who commit multiple non-violent offenses the opportunity to  
16 receive treatment in lieu of jail can help encourage treatment.

17          25.     However, implementation of long-term or mid-term solutions is futile unless in the  
18 short term the City of Sacramento enforces the law.

19          26.     On August 7, 2023, District Attorney Ho received an email after business hours  
20 from Sacramento City Attorney Susana Alcala Wood in which she wrote, “SPD is simply not  
21 issuing citations for unlawful camping, unlawful storage, sidewalk obstruction or any Sacramento  
22 City code sections related to homeless encampments ... Our data indicates that no citations have  
23 been referred to our office ... we cannot prosecute cases if no cases are sent to us.” The City  
24 Attorney then asked the District Attorney to help encourage the police in ‘becoming more  
25 comfortable in issuing citations.’ (See Exhibit 3)

26          27.     This letter was a shocking admission of liability that the City has failed to enforce  
27 the law.

28



1 residences located at 29<sup>th</sup> and C Street in Sacramento. Jennifer Doe and Justin Doe reside on 29<sup>th</sup>  
2 Street. Staci Doe and Ryan Doe reside on C Street. Jason Doe is a longtime youth soccer coach  
3 at Stanford Park. These individuals are collectively referred to herein as the “C Street Victims.”

4 37. Starting March 2020 and for the past few years, hundreds of unhoused transients  
5 have inhabited an encampment consisting of trailers, tents, and makeshift structures on 29<sup>th</sup> and  
6 C Street near Stanford Park. Most recently members of the encampment have moved to C Street  
7 and Alhambra. (See Exhibit 4)

8 38. The encampment has fully occupied entire stretches of sidewalk, thereby impeding  
9 ingress and egress to Victims’ homes. Residents were forced to walk in the road to access their  
10 properties at their peril. (See Exhibit 5)

11 39. The unhoused inhabitants light campfires on the sidewalk and in the street daily.  
12 Some fires are so large and dangerous and have prompted calls to the fire department. Staci Doe  
13 observed that some fires were so large that embers flew onto victims’ property. Not only do the  
14 campfires endanger victim properties and their safety, but encampment inhabitants have also  
15 repeatedly threatened to burn the neighborhood to the ground. Compounding this obvious danger,  
16 the encampment and its inhabitants impede necessary access to public fire hydrants. (See Exhibit  
17 6)

18 40. The encampment inhabitants commit crimes regularly including threatening to kill  
19 victims while armed with deadly weapons, openly selling and use of narcotics, breaking into  
20 resident cars and homes, masturbating in public, and engaging in prostitution. Further, many of  
21 the unhoused residents have dogs which roam C Street off leash and/or unsupervised. C Street  
22 victims have been chased by vagrant canines.

23 41. The encampment inhabitants have maliciously vandalized victim homes and  
24 property repeatedly. They have thrown rocks through their windows, stole furniture from their  
25 porches, shot windows out, and even attempted to light Staci Doe’s car on fire.

26 42. The encampment residents regularly trespass upon victim properties, finding  
27 alcoves and dimly lit areas to defecate, use drugs, fornicate and/or masturbate. The trespasses  
28 have resulted in piles of feces and toilet paper festering on the properties, creating foul smells and

1 unsanitary conditions. Further, several unhoused have, on multiple occasions, attempted to tap  
2 into victims' electrical system to steal power, resulting in increased cost and thousands of dollars'  
3 worth of destruction of victim property.

4 43. The unhoused became increasingly aggressive and territorial. Victims were  
5 regularly threatened and/or assaulted for simply walking down the street. Jennifer Doe opened  
6 her front door to be met by an unhoused person with a firearm pointed at her face. Multiple  
7 victims have been assaulted by the encampment dwellers with weapons. Jennifer Doe was lunged  
8 at with a knife and Anayeli Doe was assaulted with garden shears. An unhoused individual  
9 pointed a laser into Staci Doe's eyes.

10 44. Encampment individuals also consistently engage in physical fights and multiple  
11 acts of violence (including domestic violence) against each other. This has been described as the  
12 "witching hour" by victims who have observed the unhoused attack each other in the street with  
13 large knives and other deadly weapons while threatening to kill each other.

14 45. Animal abuse was also rampant at the encampment. The inhabitants would beat  
15 and punish their dogs repeatedly, and the victims have called 911 many times to report such abuse.  
16 In April of 2023, Jennifer Doe called 911 for four hours straight because she heard a dog loudly  
17 screaming and crying as it was getting beaten by an encampment inhabitant. She called the noise  
18 awful and describes the disturbing "noise of an animal screaming in torment" as something she  
19 can never "unhear." The dog was eventually found dead in the morning. Another day, another  
20 dog was found to have many broken bones due to the abuse it suffered by an encampment  
21 inhabitant.

22 46. Violence is second nature to these encampment inhabitants. They have hit a  
23 woman with a skateboard rendering her bloody and unconscious and attempted to run people over  
24 with a car. During the winter of 2020, an unhoused subject with a running chainsaw was cruising  
25 around the victim's neighborhood on a skateboard laughing and chasing people. In March of  
26 2021, another encampment inhabitant violently raped a woman threatening others not to  
27 intervene.

28 47. The violence never stopped. Similar acts of violence continued until February



1 2023, when Staci Doe and Ryan Doe were confronted by a felon who threatened to kill them with  
2 a firearm at their front porch. After that terror, they were forced to move out of their residence  
3 due to the trauma of what they experienced. They began couch surfing on friend's and relative's  
4 homes to avoid the destruction that had been allowed to overtake their neighborhood. They  
5 described their experience as living in a Libyan terror camp. Staci has subsequently been  
6 diagnosed with Post Traumatic Stress Disorder and they have yet to return to their home full-  
7 time.

8 48. The unhoused also created disturbing and unwanted noise at all hours of the day.  
9 They were constantly screaming and cursing at each other day and night which routinely  
10 prevented the victims from sleeping at night. In October 2020, a longtime encampment inhabitant  
11 placed a 3-foot-tall speaker in front of the victims' residences and blasted loud music for 72 hours  
12 straight until the police department eventually arrived. The encampment resident was arrested as  
13 the speaker had been reported stolen.

14 49. As a direct result of the dangers posed by the encampment inhabitants, victims  
15 have incurred thousands of dollars worth of property damage, theft of personal property, and lost  
16 income. Jennifer Doe has ceased providing piano lessons at her residence as parents felt their  
17 children were unsafe at her home. This loss of clientele adversely impacted her business, and  
18 profit margin.

19 50. Victims Anayeli Doe and Ginger Doe have also lost rental income due to the  
20 encampment residents' erratic behavior. Ginger has had to repeatedly lower rent to attract renters.  
21 Renters would not stay long as the unhoused would often order meal delivery like "door dash"  
22 and "uber eats" and use her rental as the delivery address. Renters would be awakened at all  
23 hours of the night to the doorbell ringing from the constant food deliveries being made.

24 51. Not only were the streets and sidewalks inaccessible; Stanford Park which hosted  
25 neighborhood youth soccer was severely impacted. Games had to be stopped due to the constant  
26 presence of hypodermic needles and crack pipes. (See Exhibit 7) Recent clean-ups have resulted  
27 in the collection of over 750 used needles. Unhoused took over the park by allowing their  
28 aggressive dogs to run around unleashed, occupying the benches, and taking over the bathrooms

1 to engage in drug use and prostitution. An encampment inhabitant took over portions of the  
2 soccer field to charge his solar panels for his PlayStation.

3 52. C Street victims have called the City's 3-1-1 non-emergency response line ("311"),  
4 contacted the City's Department of Community Response, as well as their council representative  
5 on numerous occasions. The victims have also complained to law enforcement. In response to  
6 their complaints, the City of Sacramento, its officials, employees, and agents routinely informed  
7 C Street victims that nothing could be done. Multiple C Street victims have also been told to "get  
8 used to" the unhoused because there was "nothing" the city was able to do, and that victims should  
9 consider themselves "privileged" in comparison to the encampment dwellers. Jennifer Doe was  
10 told to try and "step over needles" that were strewn in the streets and sidewalks of their  
11 neighborhood.

12 53. After repeated calls to 311 and communication with the Department of  
13 Community Response, Jennifer Doe attempted to make remarks at a city council meeting only to  
14 be shut down as her comments "were not on the agenda."

15 54. Anayeli called 311 repeatedly and her councilmember's office over 20 times  
16 receiving no return call from her councilmember. Anayeli received a call from a representative  
17 from her councilmember's office which she found offensive. The representative made her feel as  
18 though she should not be complaining about the unhoused and that Anayeli should consider  
19 herself privileged for having the home she worked so hard for.

20 55. C Street victims are informed and believe, and thereon allege, that the City of  
21 Sacramento, its officials, employees, and agents refused to address the dangers posed by the  
22 encampment dwellers based upon the express or implied directives/policies of city officials and  
23 leaders.

### 24 **The R Street Encampments**

25 56. Tanya Doe has resided on P Street for over twenty years. Jeff Doe has operated  
26 his firm at 1718 3<sup>rd</sup> Street for over twenty years. He employs over twenty employees at his  
27 location. They are collectively referred to as "R Street Victims."

28 57. Since March of 2020, a large encampment has formed is now embedded in the

1 neighborhood. A large number of tents, RV's, and broken cars line the sidewalks from S Street  
2 to Q Street from 2<sup>nd</sup> Street through to 3<sup>rd</sup> Street. R Street victims describe the encampment as  
3 getting progressively worse since then. (See Exhibit 8)

4 58. Victims regularly witness drug deals and drug use. Used needles litter the  
5 sidewalks, as do trash and human feces. There are bicycle parts throughout the encampment. The  
6 encampment inhabitants allow their dogs to roam off-leash near and around R Street, thereby  
7 endangering the R Street victims. (See Exhibit 9)

8 59. Encampment residents break in the victims' cars, break office windows, defecate  
9 near their doors, use their landscaping to dispose of used hypodermic syringes and human  
10 excrement. Unhoused also scream, intimidate, and harass R Street victims coming to and from  
11 work and home. Some encampment members also use the sidewalk and pedestrian walkway to  
12 operate a bicycle chop-shop in broad daylight.

13 60. Tanya Doe smells fires coming from the encampments routinely. For the first time  
14 in decades the fire department ran drills in her building to prepare for the danger the unhoused  
15 fires pose. The trees that provided her privacy from the freeway had to be cut down in order to  
16 attempt to prevent fires caused by the unhoused. (See Exhibit 10)

17 61. The unhoused have negatively affected Tanya's quality of life greatly, especially  
18 since May of 2023. She no longer walks at night and can no longer ride her bike regularly as the  
19 unhoused in the area are unpredictable. For the first time in decades her car was broken into. She  
20 is now contemplating moving away from the area.

21 62. Jeff Doe has also contemplated relocating his practice to a safer location. His  
22 employees routinely inform him that they do not feel safe coming to and from work. He describes  
23 the encampment take over as "the disintegration of civilized society in full display" and says the  
24 neighborhood now looks worse than a "3<sup>rd</sup> world country."

25 63. The R Street victims have called 311 and law enforcement on numerous occasions.  
26 In response to the complaints, the City of Sacramento, its officials, employees and agents  
27 routinely inform the R Street Victims that nothing can be done. Tanya Doe authored a letter to  
28 her councilmember begging for help (See Exhibit 11). She received no response from the

1 councilmember.

2 64. The R Street Victims are informed and believe, and thereon allege, that the City  
3 of Sacramento, its officials, employees, and agents refuse to address the dangers posed by the  
4 encampment in and around the neighborhood based upon the express or implied  
5 directives/policies of city officials and leaders.

6 **17<sup>th</sup> Street Encampments**

7 65. Rebecca Doe has lived in the midtown neighborhood around 17th Street between  
8 I Street and J Street in Sacramento for over a year. Sara Doe and Aubrey Doe opened their store  
9 on I Street in December of 2019. An unhoused encampment entrenched itself in the neighborhood  
10 at I Street between 17<sup>th</sup> and 18<sup>th</sup> Streets in April of 2020 and remained until it was finally cleared  
11 in July of 2023. Collectively they are referred to as “17<sup>th</sup> Street Victims.”

12 66. Rebecca Doe still regularly encounters encampment inhabitants trespassing in  
13 the neighborhood. She has been threatened with rape while jogging near her house by a unhoused  
14 man. She has been followed and terrorized by another large unhoused man while trying to walk  
15 back to her house. The unhoused have screamed and engaged in fights in the street at all hours  
16 of the night. Unhoused throw trash into the street and one unhoused individual poured milk on  
17 her car. She now alters her walking and jogging habits and must drive (instead of walk) after  
18 dark.

19 67. Sara and Aubrey have operated their woman owned business on I Street since the  
20 end of 2019. Since then they have been negatively impacted by the encampment individuals.  
21 They have been victims of power theft, flashing, vandalism and assault. They see constant drug  
22 sales and use.

23 68. In 2021, Sara Doe was confronted by two unhoused subjects in front of her  
24 business. They demanded money and chased her when she said she didn't have any. She called  
25 9-1-1- and received no response.

26 69. Since 2021 several employees have been harassed by the encampment inhabitants.  
27 One employee was chased by an unhoused individual yielding a broken wine bottle. Other  
28 employees have been harassed by encampment inhabitants while taking out the trash. Customers

1 have also been intimidated by the unhoused nearby, causing them to not want to frequent the  
2 business. Due to constant harassment by the unhoused, Sara and Aubrey have had to train their  
3 employees to call 3-1-1 and report the previous night's criminal activity as part of their opening  
4 procedure.

5 70. Sara and Aubrey have now had to modify their operating hours and create a buddy  
6 system just to use the restroom. Their business has suffered a large monetary loss. They have  
7 spent over \$4,500 in damages and extra security costs and shortening their hours of operation has  
8 costs them \$6,000 in lost revenue. They are constantly receiving notifications that their security  
9 system is being triggered by unhoused trying to enter their store and using their doorway to use  
10 drugs. They feel unsafe and anxious and do not know whether their business can survive. (See  
11 Exhibit 12)

12 71. The 17<sup>th</sup> Street victims have called 311 and law enforcement on numerous  
13 occasions. Aubrey and Sara have called 311 over a hundred times. In response to the complaints,  
14 City of Sacramento, its officials, employees and agents routinely inform the 17<sup>th</sup> Street victims  
15 that nothing can be done.

16 72. 17<sup>th</sup> Street victims are informed and believe, and thereon allege, that the City of  
17 Sacramento, its officials, employees, and agents refuse to address the dangers posed by the  
18 encampment in and around the neighborhood based upon the express or implied  
19 directives/policies of city officials and leaders.

### 20 The Downtown Encampments

21 73. Nikki Doe works on J Street in downtown Sacramento. Ken Doe has operated his  
22 business, "G Street Café" at 906 G Street since 2018. Since March of 2020, nearby encampments  
23 on I and J Streets between 5<sup>th</sup> and 9<sup>th</sup> constantly endanger Nikki, Ken and their employees as they  
24 travel to and from work. Both these businesses are located within blocks of Sacramento City  
25 Hall. They are collectively referred to as the "City Hall Victims."

26 74. Residents of the encampments have and continue to damage Ken's café (CAFÉ).  
27 Since June of 2021, the unhoused have broken windows at the café four times, (See Exhibit 13)  
28 the last act of vandalism occurred July of 2023. Unhoused subjects come into his café several

1 times a week, intimidating customers and occupying the bathroom for hours at a time. Unhoused  
2 subjects sleep in front of his door leaving trash, human excrement, and drug paraphernalia that he  
3 must clean.

4 75. The constant presence by the unhoused has negatively impacted his business. The  
5 sidewalks are blocked, animals are on the sidewalk, all which discourage customers from entering  
6 the business resulting in the loss of sales. Furthermore, the property damage alone has cost  
7 thousands of dollars. (See Exhibit 14)

8 76. Further, the encampment individuals pose a significant public health risk to Nikki  
9 Doe, her customers and employees. Nikki and her employees have to escort 8-15 unhoused  
10 trespassers out a day, most of whom are combative.

11 77. Nikki Doe's employees have been harmed many times. Recently in July of 2023,  
12 an encampment resident threw a water bottle at an employee's head. Another employee slipped  
13 and fell on an unhoused person's urine and human excrement while accessing the stairwell.  
14 Nikki's hospitality business has been negatively impacted because people do not want to come to  
15 downtown Sacramento due to the unhoused and crime they commit.

16 78. The City Hall victims have called 311 and law enforcement on numerous  
17 occasions. In response to the complaints, City of Sacramento, its officials, employees and agents  
18 routinely inform them that nothing can be done.

19 79. The City Hall victims are informed and believe, and thereon allege, that the City  
20 of Sacramento, its officials, employees, and agents refuse to address the dangers posed by the  
21 encampments in and around the City Hall Victims businesses based upon the express or implied  
22 directives/policies of city officials and leaders.

### **The Encampments at Broadway and X Street**

23 80. Jerri Doe is a resident of Midtown Sacramento, Sofia Doe is a resident of South  
24 Land Park and Steve Doe owns and operates a business near the Broadway and X Street area.  
25 They are collectively referred to herein as the "Broadway and X Street Victims."  
26  
27  
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1           81.     The Broadway and X street unhoused encampment has fully occupied the entire  
2 stretches of sidewalk on both sides of the street beneath the Interstate 50 and Capital City Freeway  
3 exchange. Any pedestrians are forced to walk in the road on a very busy stretch of roadway.

4           82.     The unhoused encampment at this location consists of garbage, tents, cars,  
5 makeshift structures, open fires and animals. (See Exhibit 15)

6           83.     Starting March of 2020 Victim Steve Doe saw an increase in unhoused population  
7 in the area. After the X Street Navigation Center opened, in September 2021, he again saw the  
8 population of unhoused spike up.

9           84.     He has operated his business on X Street for approximately 23 years and the  
10 business is less than a mile away from the Broadway and X Street encampment.

11          85.     Almost daily, Victim Steven Doe must clean up human feces, drug needles and  
12 garbage from the front and around his business.

13          86.     His business is visited by unhoused people daily. The unhoused have stolen  
14 merchandise, broken merchandise and harassed his clients and employees.

15          87.     The daily stress of dealing with the unhoused is exacerbating a mental toll on his  
16 employees, that while he has not lost an employee yet, he fears that it is a matter of time.

17          88.     Victim Steve Doe described an incident when an unhoused individual was so angry  
18 that they were being asked to leave the store, that with outstretched arms, the individual walked  
19 out of the store knocking over and breaking a substantial amount of merchandise. Victim Steve  
20 Doe estimates approximately \$2000 in broken merchandise from unhoused people visiting his  
21 store.

22          89.     He said it is common to have unhoused people half naked and yelling at screaming  
23 at the store. He described one incident when he called the Sacramento Police Department for help  
24 and was told there is nothing that can be done to help him.

25          90.     Victim Steve Doe says that as a result he depends first on the security provided by  
26 the Broadway Association, as their response is usually faster than that of law enforcement.

27  
28

1           91.       The windows of his business have been broken so often that his insurance company  
2 will no longer insure the windows of his business. Since 2020, he has spent approximately \$12,000  
3 in window repairs.

4           92.       To compensate for his losses and the stress Victim Steve Doe has modified his  
5 business practices. He no longer has mirrors facing the street to prevent anyone with mental  
6 illness from attacking the windows. He now lines his business windows with furniture to prevent  
7 as much visibility inwards.

8           93.       Victim Steve Doe opened a space in Roseville to sell his items in order to  
9 compensate for the lost business here in Sacramento.

10          94.       Victim Steve Doe also upgraded his security camera system at an additional cost  
11 for \$40-\$70 a month. He no longer sleeps comfortably through the night as the security system is  
12 connected to his phone, and he is constantly checking cameras during the night. This has been an  
13 added stressor to his life.

14          95.       Victim Steve Doe said when he spoke with City Councilmember Katie Valenzuela,  
15 she told him to have more compassion for the unhoused and that they meant no harm.

16          96.       Victim Jerri Doe is 82 years old and lives in the Midtown Area on a fixed  
17 income. Her primary form of transportation is a bicycle. Jerri Doe stated that she travels by the  
18 Broadway and X Street location.

19          97.       Approximately 6 months ago, Victim Jerri Doe traveled by the Broadway and X  
20 Street encampment when returning from the store. She said she normally walks her bicycle on  
21 sidewalks where there is an increased amount of traffic is. Due to the large sidewalk obstruction  
22 on both sides of this street, Jerri Doe was forced to ride her bicycle on the street.

23          98.       She described being cursed at and intimidated by the unhoused inhabitants living  
24 at that encampment.

25          99.       She was recalled being very frightened by the traffic and the unhoused inhabitants  
26 and now feels limited to where she can travel.

27          100.       Victim Jerri Doe said that since living in Midtown, 5 pharmacies have closed due  
28



1 to unhousted activity. As a result, there is one remaining pharmacy, Target on 1707 J Street. On  
2 June 23, 2023, that Target caught fire due to arson. Jerri Doe said that pharmacy was closed for 3  
3 weeks. She said she worried that this final pharmacy would permanently close leaving her with  
4 no options close by.

5 101. Victim Jerri Doe said she regularly shops at the local Grocery Outlet in Midtown  
6 due to the unhousted activity in the area, there are no shopping carts available. She said she spoke  
7 with management asking them to please provide shopping carts for their elderly customers. Victim  
8 Jerri Doe said management informed her they could not keep the shopping carts due to the  
9 unhousted constantly stealing the carts. As a result, her and other elderly shoppers are forced to use  
10 baskets which are heavy and difficult for her to carry.

11 102. Victim Jerri Doe said she never reached out to a local official until filling out the  
12 Sacramento District Attorney's questionnaire. She was motivated because she feels that her  
13 independence is slowly being diminished, the elderly have been forgotten and make the perfect  
14 victims.

15 103. On February 2, 2021, Victim Sofia Doe was attacked by an unhousted man. The  
16 Man attempted to drag her into his car and sexually assault her. This event has been life changing  
17 for Victim Sofia Doe and she now suffers from ongoing panic attacks.

18 104. Victim Sofia Doe's mother, Nancy Doe said her daughter is not the same person  
19 she once was and is uncertain if she will ever be the same. This incident has altered her life  
20 trajectory, and a once independent woman now still lives with her at home.

21 105. Both women also indicate that the safety of her home in a quiet South Land Park  
22 area has also been compromised due to increased unhousted activity. Her family has added security  
23 cameras and locks to their backyard gates.

24 106. Through security camera footage they have seen the unhousted roaming around in  
25 Their backyard, taking from them the sense of security they once had in their home. They are in a  
26 constant state of fear even inside their home. (See Exhibit 16)

27 107. Nancy Doe said that she used to walk to Midtown regularly from her home but no  
28

1 Longer feels that she can safely walk. The encampments block sidewalks making them unusable  
2 and she is afraid due to the unpredictable nature of many of the unhoused.

3 108. The Broadway and X Street victims have called 311 and the police on numerous  
4 occasions. In response to the complaints, City of Sacramento, its officials, employees and agents  
5 routinely inform them that nothing can be done.

6 109. The Broadway and X Street victims are informed and believe, and thereon  
7 alleges that the City of Sacramento, its officials, employees, and agents refuse to address the  
8 dangers posed by the encampments based upon the express or implied directives/policies of city  
9 officials and leaders.

### 10 The Commerce Circle Encampment

11 110. Byron Doe owns a commercial building on Commerce Circle in the City of  
12 Sacramento. Victim Byron Doe has owned the building since 2003 and currently leases the  
13 building to a business. He is known as the "Commerce Circle Victim" herein.

14 111. Victim Byron Doe stated since 2020 he has noticed an increase in unhoused  
15 activity, with several hundred motor vehicles parking in the area. (See Exhibit 17)

16 112. The unhoused inhabitants engage in a variety of illegal activity that he witnesses  
17 daily. There is open air drug use, selling of drugs, animals on the loose, blocked sidewalks, fires  
18 so large that require a response from the fire department. He said last year there was a homicide in  
19 the area. (See Exhibit 18)

20 113. Victim Byron Doe said almost daily he cleans human feces, needles and deals  
21 with blocked sidewalks.

22 114. Unlike traditional commercial leases, Victim Byron Doe states he feels that he  
23 must pay for all repairs and upgrades to the building. He installed a \$12,000 security system to  
24 protect the building and installed a laser security system in the parking lot. Victim Byron Doe fears  
25 that without these accommodations he would lose his tenant, and jeopardize his investment.

26 115. Victim Byron Doe also said that his building is routinely vandalized, despite his  
27 best efforts to secure the property. The fence and razor wire surrounding his building have both  
28 been cut since installing the new system.

1        116.        Victim Byron Doe said that he also helps work his tenant business when it is  
2 short-staffed or during the winter when it gets dark early to allow people who don't feel safe to  
3 leave early. He says he does this to ensure the business continues to operate out of his building.

4        117.        He also states that he has not raised the rent in his building since 2011. He is  
5 afraid any increase will drive the tenant away, as there are other locations in the area that do not  
6 have the same unhoused problem as Commerce Circle.

7        118.        Victim Byron Doe said that part of his retirement is in this building and he is  
8 watching himself lose his retirement every year.

9        119.        In addition to the financial struggles, Victim Byron Doe said that what attracted  
10 him to this building was its location close to the parkway. Prior to the large encampment, he would  
11 take walks or run on the parkway. He can no longer use the Parkway or go for walks due to the  
12 dangerous conditions.

13        120.        Victim Byron Doe said he reached out to the Sacramento Police Department but it  
14 often requires hours of wait for a response or he is direct to 311. Victim Byron Doe said when he  
15 contacted 311 nothing usually happened, except on occasion a vehicle will be tagged, only to have  
16 the vehicles return the next day.

17        121.        Victim Byron Doe said he once reached out to the Sacramento Police Department  
18 to remove an unhoused person who was setting up a tent on his private property and was told  
19 nothing could be done. Given the limited assistance from the police department, Victim Byron  
20 Doe states property owners are being forced into confrontations to clear their properties.

21        122.        He also stated that he has contacted the City Council but feels that the Council  
22 listens to the unhoused advocates instead of people like him. Victim Byron Doe said he contacted  
23 Sacramento City Mayor Darrell Steinberg on several occasions and receives every excuse except  
24 enforcement of laws. Victim Byron Doe said it was clear that the laws were not being enforced.

25        123.        He wonders why law-abiding citizens, business entrepreneurs, like himself are  
26 held to such rigid standards by the City and other regulatory agencies, but the unhoused are allowed  
27 to illegally dispose of sewage, engage in criminal activity, disregard all City ordinances without  
28 proactive enforcements and penalties.

1 124. The Commerce Circle victim is informed and believes, and thereon alleges that  
2 the City of Sacramento, its officials, employees, and agents refuse to address the dangers posed  
3 by the encampments based upon the express or implied directives/policies of city officials and  
4 leaders.

5 **The Encampments near F Street to I Street**

6 125. Dr. Todd Doe is a dentist and his office is located near the F and I Street  
7 Encampment. Dr. Doe purchased the building in 2010. Dr. Todd Doe hereinafter referred to as  
8 the Victim of F Street to I Street.

9 126. Since 2015, Victim Dr. Doe has noticed a steady increase in unhoused activity,  
10 but it has dramatically increased in the past couple of years.

11 127. Victim Dr. Doe said that he comes in early every day to check the property for  
12 human feces, needles or to remove the unhoused from his property. He said he cleans up about  
13 once a week himself because he cannot ask his staff to clean up.

14 128. The building used to have two showers on the first floor, but he was forced to  
15 remodel and remove the showers due to the unhoused constantly breaking in and trashing the  
16 showers.

17 129. Victim Dr. Doe change the locks to his building to timed locks to prevent the  
18 unhoused from sleeping in his stairwell. As a result, mail needs to be delivered before 6 PM or  
19 the doors lock. Dr. Doe said this impacts his business as there are often checks in the mail that he  
20 may not get for 3-4 days.

21 130. Since 2010, Victim Dr. Doe said he has spent approximately \$100,000 securing  
22 and repairing his building. Six months ago, he upgraded the building camera system at a cost of  
23 \$7,500. While a significant cost, Victim Dr. Doe said he felt this was necessary to protect his  
24 building.

25 131. The cameras sound an alarm and allow him to talk to the unhoused on his  
26 property. He said due to this, the amount of feces he picks up has now decreased to less than once  
27 a week. However, Dr. Doe said that since the cameras are accessible on his phone, he is constantly  
28

1 checking the video feed and alarms. The constant stress and worry are impacting his life outside  
2 the office.

3 132. Victim Dr. Doe said that he has called law enforcement repeatedly for the  
4 unhoued people camping at his building, but they either will not come out to remove them or  
5 arrive four hours later. As a result, he has to move the unhoued people himself and once had a  
6 man swing a metal pipe at him.

7 133. Victim Dr. Doe said that earlier this year, 2023, he called law enforcement for a  
8 man that was masturbating in front of his building. When the police arrived, he said it was obvious  
9 they knew the unhoued man as they called out to him by his first name. The police simply told  
10 the individual that he could not do that there and to be on his way, but no one was ever arrested.

11 134. Victim was shocked at the response since there is a middle school nearby.

12 135. As for other elected officials, Dr. Doe said that he reached out to his City Council  
13 member, and never received a response.

14 136. Dr. Doe is informed and believes, and thereon alleges that the City of

15 137. Sacramento, its officials, employees, and agents refuse to address the dangers  
16 posed by the encampments based upon the express or implied directives/policies of city officials  
17 and leaders.

### 18 **The Colonial Heights Encampment**

19 138. Victim Rosario Doe has owned property near the Colonial Heights library in the  
20 City of Sacramento since 2016. She shares the home with her young daughter and partner. Sandra  
21 Doe has owned her home in Colonial Heights since 1992. She raised her children in that home and  
22 her husband passed away in the home. Collectively, they are referred to as the “Colonial Heights  
23 Victims.”

24 139. Since March of 2020, the encampment near the Colonial Heights victims’ homes  
25 has grown to include large structural tents and garbage that obstruct the sidewalk. (See Exhibit 19)

26 140. Criminal activity is commonplace in the encampment just steps from their homes.  
27 The victims regularly see drug dealing, prostitution, sexual acts, and public urination and  
28 defecation outside the front of their homes and in their backyards. The victims also describe

1 routinely finding needles and condoms around their property. They routinely see trailers parked  
2 along the street dumping sewage and feces into the City drains with garbage overflowing into the  
3 street. (See Exhibit 20)

4 141. Sandra Doe and her son have repeatedly been terrorized by known drug dealers  
5 that frequent the area to sell to the encampment individuals. One dealer walked past their house  
6 everyday cracking a leather whip while threatening them with harm.

7 142. Sandra Doe has been diagnosed with cancer and has been receiving treatment on  
8 and off for several years. One day, as Sandra Doe was resting inside her home, her son told the  
9 dealer to stop cracking the whip as his mom was resting. The dealer confronted her son, prompting  
10 Sandra's son to call 911.

11 143. Several encampment inhabitants have threatened to burn their house down.  
12 Another inhabitant threatened Sandra Doe's son by saying he would "fuck" his mom if she was  
13 ever left alone.

14 144. In November of 2022, Sandra Doe's house was shot multiple times with a pellet  
15 gun causing damage. Even though she is on a fixed income, she was forced to pay \$1,200 a month  
16 to relocate to a different area in order to feel safe. Because of the trauma that she had already been  
17 put through however, she slept in the living room for 6 months before she got used to the quieter  
18 neighborhood. She has been diagnosed with PTSD.

19 145. Sandra Doe still checks on her property, so the encampment inhabitants don't  
20 damage it even further. She returns to her home to take care of her landscaping and turns random  
21 lights on and off to make it look as if someone was staying there.

22 146. Sandra Doe continues to see encampment inhabitants on her property with her  
23 "ring" doorbell. On Christmas Eve 2022, the camera captured an unhoused individual on her porch  
24 with a long sword hitting her front porch area and eaves with it.

25 147. Sandra describes dealing with her cancer diagnosis as well as the recent deaths in  
26 her family as an extremely difficult time in her life. Sandra lost her husband, her mother and was  
27 taking care of her elderly father during this time. She said the cancer didn't break her. The deaths  
28 of her family did not break her. But in describing her trauma due to the homeless encampment

1 she stated, "this broke me." She had once hoped to return to her family home but doesn't believe  
2 that the city will ever help her do so.

3 148. The Colonial Heights victims feel trapped and are afraid to confront the unhoused  
4 people at the encampment. The Colonia Heights Victims say the unhoused know their schedules  
5 and are afraid of retaliation or damage to their property when they have to leave their home.

6 149. Victim Rosario Doe described an event in August 2023 where she saw an  
7 unhoused man in her backyard. Rosario Doe said she was trying to put her young daughter down  
8 for a nap in her bedroom, the room has a sliding glass door. When she screamed for help, her  
9 partner confronted the unhoused man, who was armed with a knife, and was assaulted. That  
10 individual is currently facing felony charges.

11 150. On April 11, 2023, Rosario Doe stated she received a phone call from a neighbor  
12 at approximately 4 AM, warning her that an unhoused man was looking in her windows.

13 151. Rosario states that in 2023 she spent \$200 to repair a door, and currently has a  
14 broken fence that is unrepaired due to the cost and the uncertainty if the repairs would last with  
15 the encampment. (See Exhibit 21)

16 152. Victim Rosario Doe states that she cannot let her daughter outside to play even in  
17 the backyard. She is afraid of people trespassing on her property, needles, unsanitary conditions  
18 and concerned about what her daughter may witness. She is fearful when she is home and feels  
19 trapped in her current home. Victims of the Colonial Heights indicate this was not the condition  
20 of the neighborhood when they purchased their home.

21 153. The Colonial Heights victims states that they have called 311 multiple times and  
22 received no assistance. Their concern is that their neighborhood currently is not being represented  
23 by a City Council member and their needs are unheard as they are now represented by the Mayor.

24 154. The victims would like to move as soon as possible but wonders who would ever  
25 buy a home with an encampment step away from the front door. While Sandra Doe was able to  
26 rent another room, Rosario Doe has no option other than to stay in the unsafe conditions with her  
27 family while she attempts to sell her home. (See Exhibit 22)

28 155. The Colonial Heights victims have called 311 and the police on numerous

1 occasions. In response to the complaints, City of Sacramento, its officials, employees and agents  
2 routinely inform them that nothing can be done.

3 156. The Colonial Heights victims are informed and believe, and thereon alleges that  
4 the City of Sacramento, its officials, employees, and agents refuse to address the dangers posed  
5 by the encampments based upon the express or implied directives/policies of city officials and  
6 leaders.

### 7 The Encampment on W Street

8 157. Matthew Doe owns property and resides on X Street near the W Street  
9 encampment. He has lived in the area for approximately 28 years and has seen the neighborhood  
10 deteriorate. He resides in his home with his wife and minor daughter. Collectively they are  
11 referred to as the "W Street Victims".

12 158. Victim Matthew Doe states that within the last 5 years there has been an increase  
13 in the number of unhoused in the area. Their behavior is increasing in violence and danger to him  
14 and his family.

15 159. On or around July 2023, Victim Matthew Doe stated that his minor daughter had  
16 a friend visiting their home. The two minors were chased up the stairs by an unhoused woman  
17 holding hypodermic needles. The minor children were able to successfully enter the home and  
18 barricade themselves inside the home. The unhoused woman proceeded to pound on the front  
19 door while the minor children called for help. (See Exhibit 23)

20 160. The W Street Victim stated it took approximately 2.5 hours for the law  
21 enforcement to respond to the call. When law enforcement arrived, Victim Doe was told there  
22 was nothing that law enforcement could not do anything to people experiencing homelessness  
23 and she was not on probation or parole. A Sergeant eventually responded and decided to tow a  
24 van related to some complaints due to the number of complaints.

25 161. Victim Doe stated he was shocked and disappointed as he had photographic  
26 evidence of the woman with needles on his property but nothing was done to protect his minor  
27 daughter.

28 162. The Sacramento Police Department informed Victim Matthew Doe that if he was



1 dissatisfied with the response that he should contact Sacramento Mayor Darrell Steinberg.

2 163. For years, Victim Matthew Doe states he has found feces and needles weekly on  
3 his property and is forced to clean them himself. He said that as a good neighbor he also cleans  
4 the business next to his home. He said it is a constant battle. (See Exhibit 24)

5 164. He indicated that drug use was open and rampant and there is evidence of its use  
6 around the neighborhood. He described one van that had hundreds of people coming to it for drug  
7 sales. For approximately 3 days, Victim James contacted law enforcement with no urgent  
8 response. The City eventually responded and towed the vehicle but no arrests were made. (See  
9 Exhibit 25)

10 165. Victim Matthew Doe states an encampment has previously blocked the area in  
11 front of his home and his child has been scared to enter. He describes neighbors moving after  
12 their child saw an unhoused individual overdosing on the street.

13 166. Victim Doe says that he no longer feels safe in his home and is constantly  
14 worried about his family when he leaves for work. He indicated there are approximately 10 minor  
15 children on his block and the community is concerned about the safety for these children.

16 167. Approximately 2 years ago, W Street Victim added security cameras to his  
17 home, locked water spigots and installed an \$8,000 gate to prevent the unhoused from accessing  
18 his backyard. Since then Victim Matthew Doe states that he is constantly checking his cameras  
19 and is never fully at peace. (See Exhibit 26)

20 168. The W Street victims have called 311 and the police on numerous occasions. In  
21 response to the complaints, City of Sacramento, its officials, employees and agents routinely  
22 inform them that nothing can be done.

23 169. The W Street victims are informed and believe, and thereon alleges that the City  
24 of Sacramento, its officials, employees, and agents refuse to address the dangers posed by the  
25 encampments based upon the express or implied directives/policies of city officials and leaders.

26 **The Encampment on Bannon Street Between North B Street**  
27 **and Richards Boulevard**

28 170. Evelyn Doe, Brian Doe and Kesha Doe are employees at Schetter Electric, Inc.

1 (“SE”) which is a business located on Bannon Street in Sacramento. David Doe is an employee  
2 at Goldstar Insulation (“GI”) located on N. 10<sup>th</sup> Street. These individuals are collectively referred  
3 to herein as the “Bannon Street Victims.”

4 171. Between GI and SE they employ hundreds of staff members at their N. 10<sup>th</sup> and  
5 Bannon Street locations. As with both businesses, the streets leading up to their facilities are  
6 overrun with a large-scale encampment occupied by many unhoused individuals who set up camp  
7 on the sidewalk, in the street, and directly in front of their offices. (See Exhibit 27)

8 172. Drug dealers sell narcotics to the unhoused located directly in front of their  
9 property. Fights between unhoused residents regularly occur on the sidewalk and in the street  
10 next to and in front of their buildings.

11 173. Bannon street victims routinely observe indecent exposure, drug usage,  
12 vandalism, human trafficking, and receive threats to their physical safety on a regular basis. These  
13 victims are aware of multiple instances of theft of personal property, catalytic converters, gas  
14 tanks drilled for gas while their cars are parked at work.

15 174. Victims have observed animal abuse occurring at the encampments. Unhoused  
16 individuals have been observed choking their dogs and throwing small puppies into the street  
17 resulting in their death.

18 175. Residents of the encampments display erratic and unpredictable behavior. They  
19 regularly step into the street and block the road as employees drive to and from work. The  
20 unhoused throw things at the employees as they drive by, causing damage to vehicles. Another  
21 unhoused individual threatened a victim with a large boulder.

22 176. On several occasions, the unhoused have attempted to enter the locked vehicles  
23 of the employees and customers as they drive to and from the facility, creating a sense of imminent  
24 danger and unavoidable intimidation. Victims have walked to their cars after work to find  
25 unhoused people sleeping in them.

26 177. Unhoused individuals have trespassed on both properties. They have stolen  
27 items, defecated inside the building, and are verbally combative when confronted.

28 178. Due to the encampment inhabitants, piles of garbage litter the street and

1 sidewalk, attracting rats and other vermin to the area. Rodents and vermin infest both buildings,  
2 to their profound detriment. Prior to the unhoused taking over, they did not experience rodents  
3 and/or other vermin infestations on/in their respective properties. (Exhibit 28)

4 179. Bannon Street victims do not feel safe going to and coming from work. Due to  
5 safety concerns, both businesses actively discourage clients from visiting the facility. Victims  
6 and other employees have and continue to express their unwillingness to work on campus due to  
7 the dangers posed by the encampment and its inhabitants.

8 180. The victims do not feel safe. Pederson has purchased pepper spray as she is not  
9 comfortable walking from her building to her car. They can no longer enjoy their afternoon walks  
10 around their workplace for fear for their safety. They cannot remain in the area for lunch due to  
11 these same concerns.

12 181. Evelyn Doe grew up in Mexico and has seen poverty firsthand. She moved to  
13 Sacramento seventeen years ago and describes having pride for the city which has now “been  
14 replaced by fear” because of the unhoused crisis at her place of work.

15 182. Bannon Street victims have called 311 and the police on numerous occasions in  
16 response to the complaints, City of Sacramento, its officials, employees and agents routinely  
17 inform them that nothing can be done. The Bannon Street victims are informed and believe, and  
18 thereon alleges that the City of Sacramento, its officials, employees, and agents refuse to address  
19 the dangers posed by the encampments based upon the express or implied directives/policies of  
20 city officials and leaders. (See Exhibit 29)

### 21 **River Plaza Drive Encampments**

22 183. Victim Evan Doe lives in the area of River Plaza Drive in the City of Sacramento.  
23 Since 2020, Victim Evan Doe has seen his neighborhood grow with an RV unhoused  
24 encampment.

25 184. Victim Evan Doe states that at this encampment there is open air drug use, loud  
26 noises at all hours of the night that prevent him from being able to sleep or work effectively during  
27 the day. His fiancé no longer feels safe to run in her neighborhood.

28 185. He states that he has been confronted by the unhoused residents when he has called

1 police or City Code requesting enforcement.

2 186. Victim Evan Doe states that his repeated emails and calls to the City of Sacramento  
3 have gone unanswered. He specifically asked the City of Sacramento to abate the nuisance in his  
4 neighborhood and enforce the City's local ordinances with no answers.

5 187. Victims Evan Doe focus has specifically been on two RVs that are the main source  
6 of nuisance and criminal issues in his neighborhood, Southwinds RV #6CVD179 and a Chevrolet  
7 Van #7ATK430, who he says have parked in his neighborhood indefinitely since 2018.

8 188. Through a Public Information Request Act (PRA) Victim Evan Doe discovered  
9 that the City of Sacramento's Department of Community Response responded over 400 times  
10 since December 2021 and that there were over 700 police reports filed regarding the two vehicles  
11 in the last 5 years.

12 189. Victim Evan Doe then contacted City of Sacramento Mayor Darrell Steinberg's  
13 office and asked the office please coordinate an effort between the agencies.

14 190. On April 4, 2023, and April 10, 2023 Victim Evan Doe emails Sacramento City  
15 Code and the Mayor's office again and states that while an RV was towed on March 30, 2023, it  
16 was back the same day at the same location. Sacramento City Code informs Victim Evan Doe  
17 that the fines and fees for the towed vehicle were paid the same day.

18 191. On May 13, 2023, Victim Evan Doe communicated through email with  
19 Sacramento Police Captains. He asks both Captains if the Sacramento Police Department could  
20 please respond and conduct enforcement because the RVs constant presence are a public nuisance.  
21 Victim Evan Doe is informed that the police department can only respond if the vehicle is actively  
22 blocking a roadway or driveway, otherwise it is a 311 matter. The City blatantly dismissed and  
23 overlooked his pleas for help regarding the constant nuisance activity, despite being aware of the  
24 constant calls for help.

25 192. On May 16, 2023, Victim Evan Doe emails Assistant City Manager Mario Lara  
26 and asks what is the definition of a public nuisance and who is responsible for enforcing those  
27 violations. Mr. Lara directs Victim Evan Doe to the City of Sacramento's webpage. Victim Evan  
28 Doe follows up this email by providing Mr. Lara the information from the PRA informing him of

1 the hundreds of calls, directly quotes from the City of Sacramento web page regarding public  
2 nuisances and asks how his situation does not quality.

3 193. Victim Evan Doe continues to send regular emails to Mr. Lara, the Sacramento  
4 Police Department, Sacramento City Code pleading for enforcement on myriad of City ordinances  
5 such as illegal dumping, moving a vehicle every 72 hours, nuisance violations, DMV violations.  
6 He is ignored by all departments until the end of August. On September 1, 2023, the City  
7 responded that it was under a federal injunction that prevented it from enforcing laws against the  
8 unhoused. However, the injunction had already expired by then. The City was either grossly  
9 mistaken or misrepresenting the facts.

10 194. The City of Sacramento was aware of the criminal activity, nuisance and  
11 blight but chose to ignore the pleas for help from Victim Evan Doe. The City allowed the nuisance  
12 to exist and used the federal injunction to justify its inaction despite years of notice and  
13 information as to the deteriorating conditions on River Plaza Drive.

14 195. Evan Doe is informed and believes, and thereon alleges that the City of  
15 Sacramento, its officials, employees, and agents refuse to address the dangers posed by the  
16 encampments based upon the express or implied directives/policies of city officials and leaders.

### 17 **The Pitt Encampments**

18 196. Michael Doe, Tabitha Doe, and Katelyn Doe have worked on 14<sup>th</sup> Avenue for the  
19 last six years. An unhoused encampment entrenched itself in the area on 14<sup>th</sup> Avenue as well as  
20 in the large area just north of their building in an area called “the Pitt.” The inhabitant numbers  
21 have increased steadily since early 2021. Collectively they are referred to as “the Pitt Victims.”

22 197. The Pitt victims have been negatively impacted by the encampment individuals.  
23 They have been victims of power theft, flashing, vandalism and assault. They see constant drug  
24 sales and use, domestic violence, and erratic behavior by the encampment inhabitants. The  
25 inhabitants are also constantly lighting fires.

26 198. The Pitt victims have experienced theft and vandalism to their business. The  
27 inhabitants have stolen batteries from their machinery as well as many tools off their property.  
28 Inhabitants have cut the fencing around the building over a dozen times in the past couple of

1 years. They have had to increase their security measures to the tune of \$30,000 but those measures  
2 have not curtailed the damage cause by the inhabitants.

3 199. Just recently, the encampment inhabitants cut the internet cable that serviced  
4 their business resulting in a disruption in services and a profit loss over \$5,000 due to not being  
5 able to process customer orders online.

6 200. Michael Doe works as the general manager of the business and advised it is  
7 “challenging” to keep their business running because of the homeless frequently harassing the  
8 business, including illegal dumping on their property. Michael reports that employees feel unsafe  
9 coming to work due to these very conditions. Employees of the business reported that on April  
10 27, 2023, they saw a video of a car that was set on fire near the business.

11 201. The Pitt victims have called 311 and law enforcement on numerous occasions.  
12 The 311 operators have told their employees “not to call too much” or they would be placed “in  
13 the back of the que.” Also in response to their complaints, City of Sacramento, its officials,  
14 employees and agents routinely inform the Pitt encampment victims that nothing can be done.

15 202. The Pitt encampment victims are informed and believe, and thereon allege, that  
16 the City of Sacramento, its officials, employees, and agents refuse to address the dangers posed  
17 by the encampment in and around the neighborhood based upon the express or implied  
18 directives/policies of city officials and leaders.

### 19 **The Del Paso Bike Trail Encampments**

20 203. John Doe and his family have been living on Edgewater in Del Paso Heights for  
21 over 7 years. His wife Ariana Doe and her family are lifelong residents of the area. His wife  
22 describes the area as once an idyllic place to raise a family. Gerri Doe, and her 80-year-old mother  
23 have lived on Altos Avenue for many years. A large number of unhoused individuals have set up  
24 encampments all along the bike trail that runs through their neighborhood. They are collectively  
25 referred to as the “Del Paso Bike Trail victims.”

26 204. The Del Paso bike trail victims have been negatively impacted by the  
27 encampment individuals. They see constant drug sales and use, defecating and urinating in public,  
28 and erratic behavior by the encampment inhabitants. The inhabitants are also constantly lighting

1 fires and allowing their dogs to roam freely without leashes. (See Exhibit 30)

2 205. Del Paso residents have also reported encampments at the corner of  
3 Baxter Avenue and Del Paso Boulevard. for several months. Just recently, that City owned parcel  
4 went up in flames due to unlicensed starting fires on the property. (See Exhibit 31)

5 206. John Doe and his wife have seen fights among the inhabitants. One fight  
6 involved two unlicensed men – one armed with a knife and the other armed with a pipe fighting.  
7 John has seen encampment dweller walk down his street armed with man-made weapons that he  
8 describes as a long pipe with one end sharpened.

9 207. John Doe works as a firefighter and is assigned to his station overnight two  
10 nights a week. His wife and their 2 young daughters are not comfortable being alone by  
11 themselves. They often call upon other family members to stay with them when John is at work.  
12 Even during the day, the family is uncomfortable walking in their neighborhood due to the erratic  
13 behavior of the encampment inhabitants.

14 208. John Doe reports long stretches of the bike trail being unusable as they are  
15 blocked by the encampment dwellers. He reports the encampment at “Camp Resolution” has  
16 always been present but has grown exponentially since March of 2020.

17 209. John Doe has observed increasing illegal dumping in the area due to the  
18 worsening conditions spilling out of Camp Resolution onto Colfax and Traction. He has observed  
19 people dumping refrigerators, housing materials, and couches on the dirt area right outside the  
20 camp. He has also observed more dilapidated vehicles and RVs parked along the street just  
21 outside the camp.

22 210. Gerri Doe had to move in with her 80-year-old mother for their safety. She says  
23 her neighbors are constantly terrorized by the encampment inhabitants who are aggressive and  
24 constantly armed.

25 211. The Del Paso bike trail victims have called 311 and law enforcement on  
26 numerous occasions. In response to their complaints, City of Sacramento, its officials, employees  
27 and agents routinely inform the victims that nothing can be done.

28 212. The Del Paso bike trail victims are informed and believe, and thereon allege, that

1 the City of Sacramento, its officials, employees, and agents refuse to address the dangers posed  
2 by the encampment in and around the neighborhood based upon the express or implied  
3 directives/policies of city officials and leaders.

#### 4 **The Auburn and Marconi Circle Encampments**

5 213. Georgina Doe, and her children have lived on Marconi Avenue for over 5 years.  
6 Ryan Doe has lived on Naomi Way for over twenty-five years. Eric Doe works for a company  
7 that is responsible for fire hydrants in and around Sacramento including the one located at 1834  
8 Auburn Boulevard. An unhoused encampment entrenched itself in the area of Marconi Circle  
9 and encampments have formed on Auburn between Marconi and El Camino as well. The  
10 inhabitant numbers have increased steadily since early 2020 and saw an exponential increase after  
11 the Roseville Road encampment was moved earlier this year. Collectively they are referred to as  
12 “the Auburn and Marconi Circle Victims.” (See Exhibit 32)

13 214. The Auburn and Marconi Circle victims have been severely impacted by the  
14 encampment individuals. They have been victims of theft, flashing, vandalism and assault. They  
15 see constant drug sales and use, domestic violence, and erratic behavior by the encampment  
16 inhabitants. The inhabitants are also constantly lighting fires.

17 215. Georgina Doe and her family have been forced to live in a constant state of fear  
18 of the encampment dwellers. Their house was shot last year, breaking their back patio window.  
19 The unhoused have jumped her fence and tried to break into her home at least two times that she  
20 is aware of. She and her children have observed the encampment dwellers looking over their  
21 fence while armed with weapons.

22 216. Georgina is paralyzed by fear. She suffers from depression and PTSD. She has  
23 not been able to work as she is taking medication for her illness. She feels unsafe in her home  
24 but doesn't ever leave because she is so afraid of what the unhoused will do to her when she  
25 leaves or what they will do to her dogs she leaves in the house. She has been so negatively  
26 affected that she missed several family events including a funeral last year. She had another two  
27 relatives die recently and she fears she will not be able to make it to their funeral services either.

28 217. Georgina and her children are aware of constant fires started by the nearby



1 unhoused that rage near their home. She reports that the encampment inhabitants run their  
2 generators everyday - 24/7.

3 218. Georgina sees men walk up and down her street in their underwear. Dilapidated  
4 vehicles park in front of her house. The sidewalks are blocked by the encampments so they can  
5 longer walk their dogs. There is trash everywhere. The inhabitants have stolen her neighbor's  
6 boat, and water from the fire hydrant and Georgina's front yard.

7 219. Due to the erratic behavior of the inhabitants, Georgina installed several cameras  
8 to protect her family. While watering her plants an unhoused individual came by to tell her that  
9 he didn't like her cameras and to turn them off "or else."

10 220. Ryan Doe has lived in home for over twenty-five years. A portion of these  
11 encampments relocated in front of his house.

12 221. The encampment inhabitant in front of Ryan's home has set multiple fires, the  
13 largest have occurred within the past five months. They were so large that Ryan was afraid his  
14 home would also be engulfed in flames. Ryan called 911 and the fire department arrived. He  
15 was told that the inhabitant lit the fires to kill the rodents running around his encampment. After  
16 the police left, the man remained.

17 222. Ryan and his girlfriend Ann have seen many ordinance violations including  
18 illegal dumping, illegal parking, urinating, and defecating in public. They have also seen women  
19 having sex with men in cars on their street. His mailbox had been broken into so many times, he  
20 purchased a new "night drop" mailbox.

21 223. Ryan hears the encampment dwellers fight all day and night. They curse and  
22 scream at him. Ryan and his girlfriend have tried to leave or enter the house several times only  
23 to be stopped by an unhoused person sleeping in their driveway. His girlfriend feels too unsafe  
24 to stay at his home when he is not home.

25 224. Erik Doe monitors several fire hydrants and water sources in Sacramento. The  
26 hydrant located at 1834 Auburn Boulevard has been tampered with repeatedly by the encampment  
27 inhabitants. The unhoused have removed the caps and attached plastic bottles to the hydrant to  
28 steal water. He removed the contraption the first time he saw it, but it was there two days later.

1 (See Exhibit 33)

2 225. The Auburn and Marconi victims have called 311 and law enforcement on  
3 numerous occasions. In response to their complaints, City of Sacramento, its officials, employees  
4 and agents routinely inform the Pitt encampment victims that nothing can be done.

5 226. The Auburn and Marconi encampment victims are informed and believe, and  
6 thereon allege, that the City of Sacramento, its officials, employees, and agents  
7 refuse to address the dangers posed by the encampment in and around the neighborhood based  
8 upon the express or implied directives/policies of city officials and leaders.

9 **FIRST CAUSE OF ACTION**

10 **Public Nuisance**

11 **Civ. Code §§ 3480 *et seq.***

12 **(People of the State of California Against City)**

13 227. THE PEOPLE OF THE STATE OF CALIFORNIA re-allege and incorporate by  
14 reference each and every allegation set forth in paragraphs 1 through 226 above as though fully  
15 set forth herein.

16 228. California law defines nuisance as “[a]nything which is injurious to health,  
17 including, but not limited to, the illegal sale of controlled substances, or is indecent or offensive  
18 to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable  
19 enjoyment of life or property, or unlawfully obstructs the free passage or use, in the customary  
20 manner, of any...public park, square, street or highway[.]” Civ. Code § 3479. A public nuisance  
21 is the substantial and unreasonable interference with a public right.

22 229. As described herein, the City’s refusal to maintain the public property under its  
23 control and to enforce laws and local ordinances thereon facilitates and perpetuates a public  
24 nuisance. This failure to consistently enforce the law has and continues to convert City parks,  
25 sidewalks, and streets into rotting cesspools overrun with crime and disease. The unsanitary  
26 conditions in the homeless encampments are injurious to the public health and place many people  
27 at risk of contracting noxious diseases. The crime which runs rampant and unabated throughout  
28 the homeless encampments places people, their homes, their businesses, and their properties at  
risk. All victims have experienced a substantial and unreasonable interference with the enjoyment  
of their property. The people have and continue to suffer injury and the threat of injury as a result

1 of the homeless encampments outside their respective properties.

2 230. The People of the State of California contend that each victim has been damaged  
3 in their own right and in a manner specially injurious to them. The People of the State of  
4 California have not consented to the City's tortious conduct.

5 **SECOND CAUSE OF ACTION**

6 **Private Nuisance**

7 **Civ. Code § 3501 *et seq.***

8 **(People of the State of California Against City)**

9 231. The People of the State of California re-allege and incorporate by reference each  
10 and every allegation set forth in paragraphs 1 through 226 above as though fully set forth herein.

11 232. Each individual victim owns, leases, occupies, or otherwise controls all or a  
12 portion of the house, apartment, or business identified herein. City's actions and/or inactions, as  
13 alleged herein, has/have created a condition and/or permitted a condition to exist that is harmful  
14 to the People's health; indecent and offensive to the senses; obstructs the free passage and use of  
15 public parks, sidewalks, and streets; permits the unlawful solicitation of prostitution near and/or  
16 in front of victims' property; permits the sale and use of illicit drugs near and/or in front of  
17 victims' property; leads to the excretion of human waste on and in front of victims' property; and  
18 constitutes a fire hazard, as alleged herein above.

19 233. The City's conduct is intentional and unreasonable, or unintentional but  
20 negligent or reckless. Alternatively, the conditions permitted by way of the City's actions and  
21 inactions are the result of abnormally dangerous activities that substantially interfere with each  
22 victim's use or enjoyment of their land that would reasonably annoy or disturb an ordinary person.  
23 The People of the State of California have not consented to the City's conduct; The People of the  
24 State of California were harmed; the City's conduct was a substantial factor in causing the harm;  
25 and the seriousness of the harm outweighs any perceived public benefit, for which there is none.

26 234. The People of the State of California do not seek monetary damages. They seek  
27 only equitable and injunctive relief. Accordingly, City is not entitled to any claim of immunity.  
28 Gov. Code § 814.

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**THIRD CAUSE OF ACTION**

**Inverse Condemnation**

**Cal. Const. art. I § 9**

**(People of the State of California Against City)**

1  
2  
3 235. The People of the State of California re-allege and incorporate by reference each  
4 and every allegation set forth in paragraphs 1 through 226 above as though fully set forth herein.

5 236. California Constitution, Article I Section 19(a) provides, in relevant part,  
6 “Private property may be taken or damaged for a public use and only when just compensation,  
7 ascertained by a jury unless waived, has first been paid to, or into court for, the owner.”

8 237. City’s actions and/or inactions by way of the City’s failure to consistently  
9 enforce the law have and continue to limit, damage, and/or burden people’s property and/or  
10 business to such a degree that they rise to the level of a regulatory taking for which no  
11 compensation has been (or can be) provided.

12 238. The People of the State of California do not seek monetary damages. They seek  
13 only equitable and injunctive relief. Accordingly, the City is not entitled to any claim of  
14 immunity. Gov. Code § 814.

15  
16 **PRAYER FOR RELIEF**

17 WHEREFORE, PEOPLE OF THE STATE OF CALIFORNIA pray for judgment against  
18 Defendant City of Sacramento and for relief as follows:

- 19 1. Injunctive/equitable relief in a manner to be determined by law;  
20 2. And such other and further relief as this Court deems just and proper.

21  
22 Dated: September 19, 2023

**SACRAMENTO COUNTY  
DISTRICT ATTORNEY**

  
**THIEN HO  
DISTRICT ATTORNEY**