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6
7

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 VEM MILLER,

11 Plaintiff,

12 vs.

13 CHAD BIANCO, in his individual and
14 official capacities; COUNTY OF
RIVERSIDE, a municipal entity; and
15 DOES 1 through 100,

16 Defendants.
17
18
19
20
21
22

CASE NO.: 5:25-cv-00629-KK (DTBx)

**FIRST AMENDED COMPLAINT
FOR:**

1. 42 U.S.C. § 1983 - FIRST
AMENDMENT VIOLATIONS;

2. 42 U.S.C. § 1983 - MUNICIPAL
LIABILITY - FAILURE TO TRAIN;

3. 42 U.S.C. § 1983 - MUNICIPAL
LIABILITY – RATIFICATION;

4. 42 U.S.C. § 1983 - FAILURE TO
INTERVENE;

5. SLANDER PER SE;

6. LIBEL PER SE;

7. INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS.

DEMAND FOR JURY TRIAL

23
24
25
26 As and for its complaint, Plaintiff VEM MILLER, an individual, alleges as
27 follows:
28

INTRODUCTION

1. Plaintiff VEM MILLER (“**Miller**” or “**Plaintiff**”) is a political supporter of the 45th and 47th President of the United States of America, Donald John Trump.
2. Mr. Miller is deeply involved in political support for the President and has been since 2016, including websites, podcasts, political rallies, meetings, and involvement at the local, state, and national Republican parties.
3. As a long-time resident of Nevada, and Second Amendment supporter, Mr. Miller owns firearms.
4. On October 12, 2024, just before the historic presidential election, in his enthusiasm for President Trump, Mr. Miller requested and received tickets to the President Trump rally at Coachella, Riverside County, California.
5. In accordance with his experience of attending political rallies in Nevada, Mr. Miller did what he believed to be the right thing by approaching Riverside County Sheriff’s Department deputies approximately one mile from the site of the rally to announce that he was in possession of firearms.
6. Instead of simply issuing a citation to a fully compliant citizen, the Defendants chose to violate Mr. Miller’s constitutional rights when they detained him so he would miss the rally, excessively searched his vehicle, ignored his medical distress, arrested him, and repeatedly failed to grant him his request for a statutorily required telephone call.
7. Subsequently, Defendant Sheriff Chad Bianco (“**Bianco**”) chose to make this incident a news story when he reported to and appeared on local and national news outlets to falsely proclaim that the Riverside County Sheriff’s Department stopped the third “would-be Trump assassin”: even though the Federal Bureau of Investigations and the United States Secret Service decided not to interview Mr. Miller *because there was no reason to interview him as Mr. Miller was NOT an attempted Presidential assassin.*

1 8. By the morning hours of October 13, 2024, Defendant Bianco knew that the FBI
2 and the Secret Service had already dismissed the idea that Mr. Miller was an
3 assassin, and still Defendant Bianco proceeded to falsely and maliciously inform
4 The Epoch Times in a text message; “We arrested a man trying to get in the
5 perimeter with two firearms who ended up *saying he was going to kill the*
6 *president.*” Subsequently, Defendant Bianco told the Southern California News
7 Group that they “stopped another assassination attempt,” and that Mr. Miller had
8 “multiple phony passports and driver’s licenses.” Defendant Bianco continued
9 these false assertions during a news conference held that very afternoon at 3 p.m.
10 Following the news conference and proceeding the next day, Defendant Bianco
11 appeared on many news outlets, including renown Fox News Channel and News
12 Nation, where he falsely proclaimed that Mr. Miller was there to assassinate
13 President Trump, and that he and his department prevented Mr. Miller from
14 becoming the “third assassin.”

15 9. Defendant Bianco took advantage of a perceived golden opportunity to boost his
16 own political career and jumpstart his campaign for Governor of California¹ by
17 falsely claiming he stopped an attempted assassination of President Trump,
18 demonstrating an outrageous, reckless disregard for Mr. Miller and his rights.

19 10. Even worse, Defendant Bianco continued to change his story about what
20 happened on October 12 and October 13, 2024, adding to his lies and
21 impeachability about what transpired.

22 11. The aftermath of being falsely accused as an attempted presidential assassin has
23 been utterly devastating to Mr. Miller: destroying his previous work
24 opportunities, receiving threats which have led him into hiding, his parents’ home
25 (property) being raided by the Las Vegas Metropolitan Police Department on

26
27 ¹ *Riverside County Sheriff Chad Bianco announces run for California governor*, ABC
28 Eyewitness News (Feb. 17, 2025, 11:16 PM) <https://abc7.com/post/riverside-county-sheriff-chad-bianco-announce-run-california-governor/15921418/>

1 October 14, 2024, leaving him unable to obtain work, his ex-wife used those
2 allegations to prevent him from having any contact with his own children, and,
3 to this day, consistently receiving multiple weekly threats and harassment.
4

5 **PARTIES**

6 12.Plaintiff VEM MILLER is and at all times relevant to this Complaint an
7 individual residing in the County of Clark, State of Nevada.

8 13.Defendant CHAD BIANCO is sued in his official capacity as the present
9 Riverside County, California Sheriff, and individually. As the Sheriff, Defendant
10 is responsible for employment practices and procedures within the Riverside
11 County Sheriff's Department.

12 14.Defendant COUNTY OF RIVERSIDE ("Riverside"), California, is the county
13 responsible for Defendant Bianco and the Riverside County Sheriff's
14 Department.

15 15.The true names or capacities, whether individual, corporate, associate, or
16 otherwise of the Defendants named herein as DOES 1-100, are presently
17 unknown to Plaintiff, who therefore sue said Defendants by such fictitious names.
18 Plaintiff prays for leave to amend this Complaint to show the true names or
19 capacities of these Defendants if and when the same have been determined.
20

21 **JURISDICTION AND VENUE**

22 16.This action arises under Title 42 of the United States Code Sections 1983 and
23 1988. Jurisdiction is proper in this Court as conferred by Title 28 of the United
24 States Code Section 1331.

25 17.The jurisdiction of this court is invoked pursuant to 28 U.S.C. §§ 1331,
26 1343(a)(4), and 29 U.S.C. § 794(a).

27 18.Venue is proper in this United States District Court for the Central District of
28 California pursuant to 28 U.S.C. § 1391 in that County of Riverside, California

1 is where a substantial part of the events or omissions giving rise to all the actions
2 complained of herein took place.

3 **CALIFORNIA TORT CLAIMS ACT**

4 19. Plaintiff Miller exhausted his California Tort Claims Act statutory requirements
5 under California Government Code Sections 910, et seq. in order to bring this
6 action before this Court.

7 20. First, Plaintiff mailed his California Tort Claims Act Letter on January 16, 2025,
8 via USPS Certified Mail to Riverside County, California; Clerk of the Board of
9 Supervisors, Attention Claims Division, PO Box 1628, 4080 Lemon Street, 1st
10 Fl., Riverside, CA 92502-1628. Plaintiff also mailed his California Tort Claims
11 Act Letter on January 16, 2025, via USPS Certified Mail to the Riverside County
12 Sheriff-Coroner at 4095 Lemon St., Riverside, CA, 92501-3600.

13 21. Second, Plaintiff received a NOTICE OF REJECTION OF CLAIM from the
14 Riverside County Board of Supervisors dated January 22, 2025.

15 22. This action was brought within the six (6) months from the date of the Notice in
16 accordance with California Government Code Section 945.6.

17 **FACTUAL ALLEGATIONS**

18 23. Plaintiff Vem Miller is a media professional who operates The America Happens
19 Network, a conservative media entity. Between 2020 and 2024, Mr. Miller
20 attended over twenty (20) events for President Donald J. Trump in both
21 journalistic and social capacities.

22 24. Mr. Miller has consistently demonstrated support for President Trump through:

- 23 a. Production of pro-Trump media content since 2020;
24 b. Service as a Trump team leader and captain;
25 c. Campaign work as an America First Republican candidate in 2022; and
26 d. Active engagement in voter outreach efforts.

27 25. At approximately 3:15 PM on October 12, 2024, Mr. Miller approached the 52nd
28 Street parking lot, approximately a one mile drive from the Trump rally venue in

1 Coachella, California. Mr. Miller possessed valid entry passes for the event.

2 26. Following standard practice from his home state of Nevada, before attempting
3 to enter the venue parking area Mr. Miller voluntarily drove up to a Riverside
4 County Sheriff's Department ("RCSD") Deputy, and then voluntarily disclosed
5 to this RCSD Deputy ("Deputy 1") that he owned and possessed two firearms,
6 secured in his vehicle.

7 27. This initial interaction was captured on audio recording, during which Mr. Miller:

8 a. Immediately disclosed the presence of firearms in his vehicle;

9 i. Miller, "How are you doing, sir? Hi. So I have a question. So I'm a
10 Trump caucus captain, but I want to be totally transparent. I'm from
11 Nevada, and I do have my firearms in the back."

12 ii. Deputy 1, "You have firearms with you?"

13 iii. Miller, "Yeah, in the back, in the trunk. But, you know, obviously I
14 want to be totally transparent, but. Yeah."

15 iv. Deputy 1, "OK. How many firearms do you have?"

16 v. Miller, "I have a shotgun and I have a handgun. It's in all in the back
17 right there. Obviously, I'm not taking this down with me, it's just in
18 my car. And I want to let you guys know, okay?"

19 b. Offered to have law enforcement hold the firearms;

20 i. Miller, "You guys, do you guys want to hang on to it? I mean, I don't
21 mind you guys holding that."

22 c. Presented valid identification and entry passes; and

23 d. Made no attempt to enter the actual venue with firearms where President
24 Trump would be speaking to his supporters.

25 28. Following Mr. Miller's voluntary disclosure, Deputy 1 directed Mr. Miller to pull
26 his vehicle into a nearby alcove. Subsequently, a second deputy ("Deputy 2")
27 approached and asked Mr. Miller about why Mr. Miller was pulled over there.
28 Mr. Miller repeated his voluntary disclosure, "the gentleman that sheriff told me

1 to pull in here because I told him I have two firearms in the back, and I'm just
2 letting you guys know.”

3 29. Deputy 2 then ordered Mr. Miller to exit his vehicle, immediately restrained Mr.
4 Miller in handcuffs, stated the detention was "for his own safety and protection",
5 and placed Mr. Miller in the back of a patrol vehicle.

6 30. Mr. Miller had an audio recording device recording in his vehicle. The audio
7 captured many other statements from RCSD Deputies. A complete, true, and
8 accurate recording of the first 3 hours, 26 minutes, and 58 seconds from Mr.
9 Miller's audio device captured on October 12, 2024 can be downloaded from
10 https://drive.google.com/file/d/14RNILF2sbGvc2_SQRlxbqsbJ-Hw8RvhX

11 a. A RCSD Deputy stated, “I don't want to unnecessarily detain him [Mr.
12 Miller].” This statement indicated there was insufficient cause to detain
13 Mr. Miller.

14 31. During his detention in the patrol vehicle, Mr. Miller:

- 15 a. Was subjected to temperatures exceeding 110 degrees Fahrenheit;
16 b. Experienced and reported to one of the Deputies symptoms of a pre-
17 diabetic incident;
18 c. Repeatedly requested medical attention due to his pre-diabetic condition;
19 d. Was denied access to his supplements; and
20 e. Was denied access to bathroom facilities despite multiple requests.

21 32. Mr. Miller was informed by RCSD Deputy Coronado that the officers' only concern
22 was to ensure that the firearms were purchased lawfully. Although Mr. Miller
23 consented only to the turnover of his firearms, and expressly described their location
24 in the vehicle to Defendant Coronado, Defendants subsequently proceeded in
25 conducting an extensive search of Mr. Miller's vehicle without his consent,
26 wherein:

- 27 a. Approximately ten (10) to fifteen (15) officers, including RCSD officers,
28 FBI agents, and Secret Service agents participated;

- b. Officers deployed forensic tools including bomb-sniffing dogs and chemical swab tests;
- c. Officers removed, dispersed, and damaged Mr. Miller's personal belongings in a haphazard manner, including electronics, clothing, and medical supplies;
- d. This vehicle search lasted approximately one hour and twenty minutes;
- e. Officers left Mr. Miller's vehicle in complete disarray, in contrast to the orderly and clean condition upon Mr. Miller's arrival.

33. At no time before, during, or after said search did Defendants:

- a. Provide probable cause for the extensive nature of the search;
- b. Document any contraband in the vehicle or on Mr. Miller's person, or evidence of criminal activity;
- c. Explain the necessity for the duration or scope of the search; or
- d. Receive express consent by Mr. Miller to do so.

34. At approximately 5:00 PM, Mr. Miller was transported to Thermal Police Station.

Records indicate:

- a. Booking Number: 202445251
- b. Arrest Time: 17:00
- c. Booking Time: 20:44
- d. Location: Ave 52 x Celebration Indio
- e. Facility: John Benoit Detention Center

35. Defendants denied Mr. Miller his statutory right to a telephone call pursuant to California Penal Code Section 851.5, notwithstanding that:

- a. The aforementioned penal code was clearly posted on the walls of the detention facility;
- b. Mr. Miller specifically demanded his statutory right under Penal Code Section 851.5 to a telephone call while referencing the posted penal code;
- c. Upon Mr. Miller's second demand for his telephone call, Deputy Coronado

1 expressly refused said request; and

2 d. Mr. Miller made additional demands for his telephone call, none of which
3 were granted.

4 36. With respect to Federal Bureau of Investigation ("FBI") and United States Secret
5 Service interviews:

6 a. Mr. Miller expressly consented to the FBI and Secret Service agents
7 request to interview, subject only to his statutory right to first make one
8 telephone call;

9 b. The federal law enforcement agents departed without conducting any
10 interview and no federal agent has ever interviewed Mr. Miller regarding
11 the allegations against him.

12 37. Defendants RCSD and its Deputies thereafter:

13 a. Transported Mr. Miller to jail without any form of formal questioning
14 being conducted;

15 b. Proceeded with booking despite the absence of any federal investigation;

16 c. Failed to document any legitimate basis for continuing Mr. Miller's
17 detention.

18 38. During the booking process, Defendants:

19 a. Attempted to conduct medical tests on Mr. Miller to which he expressly
20 denied consent;

21 b. Subjected Mr. Miller to x-ray examination after his express refusal of
22 medical testing;

23 c. Failed to inform Mr. Miller of the x-ray examination prior to its
24 administration; and

25 d. Conducted the x-ray examination without obtaining required consent or
26 providing any medical necessity.

27 39. Mr. Miller was charged with two misdemeanor violations:

28 a. CPC 25850(A) - Carrying/Loaded Firearm; and

1 b. CPC 32310(A) - Large Capacity Magazine

2 40.Both misdemeanor charges resulted in his cite and release.

3 41.Early in the morning of October 13, 2024, Defendant Bianco falsely told The
4 Epoch Times in a text message, “We arrested a man trying to get in the perimeter
5 with two firearms who ended up saying **he was going to kill the president**”
6 (emphasis added.)² Mr. Miller never said those words or anything remotely like
7 those words at any time on October 12 or October 13, 2024.

8 42.Additionally, during the early morning of October 13, 2024, Defendant Bianco
9 gave an interview to the Riverside Press-Enterprise, which was published at
10 10:37 am that same day³. In this interview to the media, Defendant Bianco made
11 many false statements, including but not limited to:

- 12 a. “...the sheriff called the arrest a thwarted assassination attempt”;
13 b. “...he said [Mr. Miller] identifies with a right-leaning anti-government
14 group”;
15 c. Mr. Miller “planned to kill Trump and that deputies thwarted the plan”;
16 d. “Bianco said they also found he had multiple phony passports and driver’s
17 licenses”; and
18 e. “...arrested with guns and fake I.D.s about a quarter mile from former
19 President Donald Trump’s campaign rally.” The distance was actually six-
20

21 ² Brad Jones, *UPDATE: Riverside County Sheriff Says Suspect Never Said He Was*
22 *‘Going to Kill the President’*, (Originally published October 13, 2024, Updated October
23 24, 2024) [https://www.theepochtimes.com/us/armed-man-who-allegedly-said-he-](https://www.theepochtimes.com/us/armed-man-who-allegedly-said-he-wanted-to-kill-the-president-arrested-outside-trump-rally-5740578)
24 [wanted-to-kill-the-president-arrested-outside-trump-rally-5740578](https://www.theepochtimes.com/us/armed-man-who-allegedly-said-he-wanted-to-kill-the-president-arrested-outside-trump-rally-5740578)

25 ³ Brian Rokos, Mona Darwish, Beau Yarbrough, *Man with guns arrested near Trump*
26 *rally in Coachella; Riverside sheriff says they stopped assassination attempt*,
27 (Originally Published: October 13, 2024 at 10:37 AM PDT, UPDATED: October 17,
28 2024 at 2:57 PM PDT) [https://www.pressenterprise.com/2024/10/13/las-vegas-man-](https://www.pressenterprise.com/2024/10/13/las-vegas-man-found-with-loaded-firearm-high-capacity-magazine-near-trump-rally-in-coachella-valley/)
[found-with-loaded-firearm-high-capacity-magazine-near-trump-rally-in-coachella-](https://www.pressenterprise.com/2024/10/13/las-vegas-man-found-with-loaded-firearm-high-capacity-magazine-near-trump-rally-in-coachella-valley/)
[valley/](https://www.pressenterprise.com/2024/10/13/las-vegas-man-found-with-loaded-firearm-high-capacity-magazine-near-trump-rally-in-coachella-valley/)

1 tenths of a mile directly or one mile by walking.⁴

2 43. On October 13, 2024, Defendant Bianco held a press conference where he made
3 numerous knowingly false statements about Mr. Miller, including but not limited
4 to:

- 5 a. Falsely claimed that deputies had "prevented the third assassination
6 attempt" on President Trump;
- 7 b. Falsely called Mr. Miller a "lunatic";
- 8 c. Falsely claimed that Mr. Miller possessed "fake IDs" and a "fake press
9 pass";
- 10 d. Falsely stated Mr. Miller had "fake credentials";
- 11 e. Falsely asserted that Mr. Miller's vehicle was "in disarray" in support of
12 his other allegations;
- 13 f. Falsely asserted that Mr. Miller did not have "legitimate identification";
14 and
- 15 g. Falsely implied that Mr. Miller was a member of the sovereign citizen
16 movement based on nothing Mr. Miller said.

17 44. On October 13, 2024, Defendant Bianco appeared on at least one other live
18 interview where he continued with his false allegations: News Nation. On
19 information and belief, due to their lawyers' desire to not be subjected to a
20 defamation lawsuit, News Nation has taken down the video of the interview with
21 Defendant Bianco. A copy of the original video was preserved via download prior
22 to its take down, and can be found on Rumble - https://rumble.com/v5rqflb-dan-abrams-live-newsnation-bianco.html?e9s=src_v1_ucp .

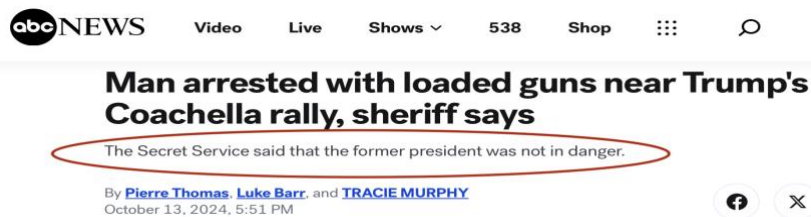
24 45. On October 14, 2024, Sheriff Bianco appeared on Fox News Channel, where he
25 made additional false statements about Mr. Miller. During this interview, Sheriff
26 Bianco:

28 ⁴ Google Maps, <https://maps.app.goo.gl/jcXNweh6WbcsmlsY7>

- a. When asked if he believed Mr. Miller's explanation, stated "...it doesn't change the fact that he brought the guns onto a Trump rally, and he was stopped before he got inside," falsely implying Mr. Miller attempted to enter the venue with firearms, which Mr. Miller did not;
- b. Maintained his false assertion that Mr. Miller's deputies "prevented another assassination attempt";
- c. Made prejudicial statements about Mr. Miller's legal dual U.S. and Canada citizenship documentation and court approved name change, which Mr. Miller had with him at the time of his detention, stating "I couldn't tell you what his real name is";
- d. Falsely suggested criminal intent, stating Mr. Miller was "only a few hundred yards, couple hundred yards from the stage where President Trump eventually was"; and
- e. Maintained the false allegations despite his acknowledgment, "we knew nothing about it."

46. The allegations and mischaracterizations made on behalf of Sheriff Bianco led to a number of incredibly damaging and facially harmful headlines on credible news outlets, including but not limited to:

- a. ABC News



b. New York Post:

US NEWS

Armed man Vem Miller arrested outside Trump's Coachella rally — as local sheriff insists it was third assassination attempt despite letting perp walk on meager \$5K bail

By [Alex Oliveira](#) and [Joe Marino](#)
Published Oct. 13, 2024 | Updated Oct. 14, 2024, 7:12 a.m. ET

3.2K Comments

c. FOX 11 (Los Angeles):

FOX 11 Live News Good Day LA Contests TV Links FOX LOCAL More

Possible third Trump assassination attempt thwarted in Coachella, Riverside County sheriff says

By FOX 11 Digital Team | Updated October 13, 2024 4:07pm PDT | Donald J. Trump | FOX 11 |

d. FOX 5 (Washington DC):

Trump third assassination attempt thwarted in California



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Man arrested outside Trump rally had two guns and fake passports

15:40 13 October 2024

Suspect possibly a member of far-right group Sovereign Citizens

Suspect Vem Miller told authorities he was a member of the far-right group called Sovereign Citizens, sheriff Bianco says.

15:25 13 October 2024

Suspect was a 'lunatic', sheriff says

Sheriff Bianco says his office is still in contact with the Secret Service and the FBI to investigate the incident "until we get to the bottom of it".

CALIFORNIA NEWS

Riverside Co. sheriff says deputies 'probably' prevented third assassination attempt on Trump

by: Austin Turner
Posted: Oct 13, 2024 / 11:41 AM PDT
Updated: Oct 13, 2024 / 04:57 PM PDT



f. KTLA 5:

g. Newsweek: "Vem Miller, Trump Assassination Attempt Suspect, Denies Plot to Kill."

h. Daily Mail:

EXCLUSIVE Sheriff doubles down on Vem Miller 'red flags' after MAGA 'lunatic' is arrested at Trump rally with loaded gun

- Miller was arrested with two firearms outside Trump's Saturday rally
- [Sign up here for DailyMail.com's U.S. Politics Newsletter](#)
- [Follow DailyMail.com's politics live blog](#) for all the latest news and updates

By KATELYN CARALLE, SENIOR U.S. POLITICAL REPORTER IN WASHINGTON, D.C.
PUBLISHED: 16:50 EST, 14 October 2024 | UPDATED: 08:23 EST, 15 October 2024

47. Over 300 total news outlets around the world carried the false statements from Defendant Bianco in their headlines and stories.

1 48. On information and belief, Defendant Bianco finally recognized the severity of
2 his false statement that Mr. Miller said he wanted “to kill the President”,
3 sometime on October 14, 2024, and sent a text message to the Epoch Times which
4 stated, “He never said it. It was bad info ... given to me. He never told a deputy
5 that...”

6 49. On Sunday, March 16, 2025, at the CAGOP convention in Sacramento,
7 California, Defendant Bianco continued with his lies about what happened on
8 October 12, 2024. After Shaun Frederickson asked Defendant Bianco about the
9 events on October 12, 2024, Defendant Bianco falsely stated that “He [Vem
10 Miller] didn’t declare anything,” regarding the firearms. He further lied, “This
11 led my deputy to further investigate to which he discovered the weapon under the
12 seat,” and that, “they found a loaded handgun under the seat and the loaded
13 shotgun in the trunk.” A true and correct copy of the Declaration of Shaun
14 Frederickson is attached herein as Exhibit “A.”

15 50. On April 12, 2025, Defendant Bianco held an event which was recorded on video
16 and audio in which his story about the events of October 12 and October 13,
17 2024, changed yet again⁵. Defendant Bianco said:

- 18 a. He falsely claimed that this entire case and international news story was
19 because of Mr. Miller, not because of his own text message to The Epoch
20 Times and his interview with The Riverside Press-Enterprise which set off
21 the media firestorm and brought this entire incident to the public’s
22 attention. “So the bottom line is, is this was media generated. And if you
23 really want to get really deep into it, it was Vem Miller generated and all
24 of his friends and social media that then the media started picking up on.”
25 b. He directly contradicted his own prior interviews and knowledge of the
26 events regarding his false statements about Mr. Miller and an attempted

27 ⁵ Sheriff Chad Bianco for California Governor Apr 12, 2025, [https://rumble.com/v6s4373-](https://rumble.com/v6s4373-sheriff-chad-bianco-for-california-governor-apr-12-2025.html)
28 [sheriff-chad-bianco-for-california-governor-apr-12-2025.html](https://rumble.com/v6s4373-sheriff-chad-bianco-for-california-governor-apr-12-2025.html)

1 assassination of President Trump, “We have no idea as a law enforcement
2 officer, any crime against the president. That's not my investigation. We
3 have absolutely no part of that. That's FBI and Secret Service. That is 100%
4 theirs. And they were responsible for him... And I, I don't know what he
5 [Vem Miller] was there for.”

6 c. Again, Defendant Bianco contradicted his own prior statements regarding
7 his false claims of an attempted assassination his beliefs, “if the FBI and
8 the Secret Service determines that he wasn't, awesome.” There is no
9 evidence the FBI and the Secret Service determined he was ever a threat,
10 let alone someone who was going to commit a serious federal crime.

11 d. Mr. Miller was only ever at the outside perimeter of the rally,
12 approximately one mile from where President Trump would speak at the
13 rally, outside of a parking lot, when he was directed into an alcove still
14 outside the parking lot, by a Riverside County Sheriff's Deputy, yet
15 Defendant Bianco falsely stated that, “We arrested him for bringing guns
16 into a Trump rally.”

17 e. Ignoring his own interview on Fox News Channel on October 14, 2024,
18 after his press conference on October 13, 2024, he said, “I have not said
19 one single thing since then, since that press conference, other than
20 answering crazy allegations.”

21 f. Continuing his baseless attacks on Mr. Miller, Defendant Bianco accused
22 Mr. Miller of making this whole thing up for his own benefit, “Mr. Miller
23 now apparently makes a living off of filing lawsuits. He filed a lawsuit
24 against us the next business morning. Just the next business morning on a
25 weekend and a holiday. How do you even find an attorney while you're in
26 jail?” Mr. Miller was in jail for hours and was released early the morning
27 of Sunday, October 13, 2024, and his own deputies wrongfully and
28 illegally denied Mr. Miller's right to make a telephone call while he was

1 in their custody.

2 51. On April 11, 2025, podcaster Britt Mayer on her The Britt Mayer Show released
3 an interview with Defendant Bianco wherein they discussed the events around
4 this present case⁶. Defendant Bianco, yet again, chose to change his story and to
5 repeat other false statements.

6 a. Defendant Bianco said, “when information started getting out that we
7 arrested someone for, you know, with guns and everything else at a
8 Trump rally after he's already been two attempts on his life. The media
9 went nuts.” The media went nuts because Defendant Bianco falsely told
10 The Epoch Times that Mr. Miller said, “he was going to kill the
11 president.” The media went nuts because Defendant Bianco followed that
12 with an interview with the Riverside Press-Enterprise where he made
13 numerous false statements about Mr. Miller.

14 b. In direct contradiction to the evidence set forth above in ¶¶ 42-49,
15 Defendant Bianco said, “the question went from was this a third
16 assassination attempt to all of a sudden different outlets just started
17 dropping the was and then saying this is a third assassination attempt.”
18 Then Defendant Bianco falsely claimed, “So we had that press
19 conference the next day and I answered all of those questions.” The press
20 conference was held the afternoon of October 13, 2024, not the next day
21 and he did not answer all of those questions.

22 c. In direct contradiction to his answers on April 12, 2025, wherein he said
23 it was the Secret Service and FBI, Defendant Bianco said, “And so the
24 question that was asked of me is, did we believe that we prevented an
25 attack. And my answer was based on what the deputy found.” He was
26

27 ⁶ Ep 37 - Sheriff Chad Bianco: California's Next Governor?
28 <https://www.youtube.com/watch?v=pvaeZVfUicg&list=PLU5w2frskedp8OA3XN-sM1UmIGhnm64o&index=4>

1 back to pointing at a deputy for all of his false statements.

2 d. Defendant Bianco continued with a new false statement, “But in the end,
3 we arrested him for fake license plates on his car...” There is no record
4 of a citation for fake license plates on his car.

5 e. Instead of taking responsibility for what he has done, Defendant Bianco
6 chose to blame the victim, Mr. Miller, for his false statements to the
7 media “it's nonstop with him about this whole assassination attempt, the
8 assassination investigation is up to the FBI and the Secret Service, not
9 me. We arrested him for state crimes, and they do whatever it is they're
10 going to do. And in the end, they chose to do nothing, which for local law
11 enforcement, I don't care.”

12 52. As a direct result of Sheriff Bianco's false statements and their widespread, global
13 dissemination, Mr. Miller has suffered severe and ongoing harm including:

- 14 a. International media coverage falsely identified Mr. Miller as a potential
15 presidential assassin;
16 b. Forced relocation due to credible threats to personal safety;
17 c. Severe reputational damage affecting professional relationships;
18 d. Loss of business opportunities and income;
19 e. Destruction of professional reputation built over decades;
20 f. Severance of family relationships, including with his children;
21 g. Ongoing harassment and threats from members of the public;
22 h. Rejection from social relationships and opportunities due to the severe
23 reputation damage; and
24 i. Severe emotional distress as a result of all of the above.

25 53. The false allegations have resulted in specific documented damages including:

- 26 a. The eviction of Mr. Miller's elderly parents (ages 80 and 77) from their
27 residence due to Mr. Miller's residence with them at the time of the false
28 allegations;

- b. Mr. Miller's inability to secure housing due to reputational damage;
- c. Loss of business relationships and opportunities;
- d. Ongoing security concerns, requiring Mr. Miller to maintain undisclosed residence; and
- e. Severe emotional distress and mental anguish.

54. Sheriff Bianco's statements specifically targeted Mr. Miller's dual citizenship status and legal name variations, despite:

- a. Mr. Miller having maintained proper documentation of all legal name changes in the vehicle with him at the time of the detention;
- b. Mr. Miller's Armenian heritage necessitating name variations for security during international journalism work;
- c. Such documentation being common among dual citizens and immigrant families; and
- d. Over 11 million U.S. residents maintaining dual citizenship status.

55. The actions of Defendants demonstrated a pattern of misconduct including:

- a. Unlawful detention without probable cause;
- b. Excessive use of force;
- c. Deliberate indifference to medical needs;
- d. Unlawful search and seizure;
- e. Intentional defamation through media statements; and
- f. Discriminatory treatment based on ethnic background.

FIRST CAUSE OF ACTION

42 U.S.C. § 1983 - First Amendment Violations

(Against all Defendants)

56. Plaintiff re-alleges as though set forth herein the allegations of Paragraphs 1 through 55.

57. The elements of 42 U.S.C. § 1983 are: (1) defendant acted under color of state law, (2) defendant's actions deprived plaintiff of a constitutional right; and (3)

1 causation between defendant's actions and plaintiff's harm.

2 58. Plaintiff hereby repeats, realleges, and incorporates that Defendants violated Mr.
3 Miller's First Amendment rights by: (a) preventing Mr. Miller from attending a
4 political rally despite his possession of valid entry passes; (b) detaining Mr. Miller
5 without probable cause when he voluntarily disclosed the presence of firearms; (c)
6 using excessive force and unlawful detention to chill protected First Amendment
7 activities.

8 59. The Defendants acted under color of state law:

- 9 a. All Defendants were operating within their official capacities as RCSD
10 employees or as the Sheriff of Riverside County.
11 b. Deputies were performing official law enforcement functions during the
12 incident.

13 60. Defendants' actions deprived Mr. Miller of his Constitutional Rights:

- 14 a. Mr. Miller was prevented from attending a political rally despite
15 possessing valid entry passes.
16 b. Mr. Miller's detention directly interfered with his right to political
17 assembly.
18 c. Mr. Miller's detention was precipitated by his voluntary firearm disclosure,
19 not by any other illegal conduct.

20 61. As a direct and proximate result of Defendants' actions, Mr. Miller has suffered
21 damages including: (a) deprivation of his First Amendment rights; (b) loss of
22 journalistic opportunities; (c) damage to professional reputation; (d) emotional
23 distress and mental anguish.

24 62. Mr. Miller is entitled to recover from Defendants for his general, noneconomic
25 damages in an amount to be determined at trial.

26 63. Mr. Miller is entitled to recover his reasonable attorney fees, expert witness
27 expenses, and litigation costs.

28 64. Mr. Miller is entitled to punitive damages for the malicious intent of the

1 Defendants.

2 65. WHEREFORE, Plaintiff requests relief as hereafter provided.

3 **SECOND CAUSE OF ACTION**

4 **42 U.S.C. § 1983 - Municipal Liability - Failure to Train**
5 **(Against Defendant Riverside County)**

6 66. Plaintiff re-alleges as though set forth herein the allegations of Paragraphs 1
7 through 55, 59, and 60.

8 67. The elements in Municipal Liability Failure to Train are: (1) inadequate training
9 program, (2) deliberate indifference to constitutional rights, (3) and causal link
10 between inadequate training and constitutional violation. *City of Canton v.*
11 *Harris*, 489 U.S. 378 (1989) (failure to train standard); *Connick v. Thompson*,
12 563 U.S. 51 (2011) (pattern of violations); *Board of County Comm'rs v. Brown*,
13 520 U.S. 397 (1997) (deliberate indifference); *Rodriguez v. Cty. of L.A.*, 891 F.3d
14 776 (9th Cir. 2018) (unreasonable searches).

15 68. Mr. Miller hereby repeats, realleges, and incorporates that Defendants Riverside
16 County and RCSD:

17 a. Failed to adequately train employees regarding: (a) proper procedures for
18 voluntary firearm disclosure; (b) constitutional limits on searches; and (c)
19 medical care for detainees.

20 b. Maintained inadequate policies regarding: (a) public statements about
21 ongoing investigations; and (b) use of force protocols.

22 69. Defendants Riverside County and RCSD had inadequate training programs: (a)
23 Officers demonstrated lack of proper training regarding voluntary firearm
24 disclosure procedures; (b) inadequate training on constitutional search
25 limitations; (c) insufficient training on detainee medical care protocols; and (d)
26 improper training regarding public statements about ongoing investigations.

27 70. Defendants Riverside County and RCSD demonstrated deliberate indifference to
28 Constitutional rights through: (a) pattern of misconduct demonstrating systemic

1 failures; (b) Sheriff's prioritization of political advancement over constitutional
2 protections; (c) failure to have proper RSCD policies in place regarding
3 Constitutional limits when detaining an individual; and (d) failure to implement
4 proper RSCD training despite known risks.

5 71. The evidence shows a causal link between inadequate training and constitutional
6 violations: (a) direct connection between training deficiencies and constitutional
7 violations; and (b) Sheriff Bianco's improper training on public statements
8 directly led to defamatory statements and false light.

9 72. Defendant Riverside County has a lengthy history of prior incidents:

- 10 a. *Leon v. County of Riverside* (2023) 14 Cal.5th 910, in this negligent
11 infliction of emotional distress case, the California Supreme Court ruled
12 that Government Code § 821.6 does not broadly immunize police officers
13 or other public employees for any and all harmful actions they may take in
14 the course of investigating crime.
- 15 b. *Estate of Richard Matus, Jr. v. County of Riverside*, Case No. 5:23-cv-
16 00506 (C.D. Cal. 2023), involves extensive allegations of abuse by the
17 Riverside County Sheriff's Department.
- 18 c. *Genaro Bautista v. County of Riverside*, Case No. 5:24-cv-01658 (C.D.
19 Cal. 2024), alleges unlawful detention, unlawful search of a vehicle, false
20 arrest and excessive use of force.
- 21 d. The State of California Department of Justice and Attorney General Rob
22 Bonta announced on February 23, 2023, that they opened a civil rights
23 investigation into the Riverside County Sheriff's Office due to, "a pattern
24 or practice of unconstitutional policing amid deeply concerning allegations
25 relating to conditions of confinement in its jail facilities, excessive force,
26
27
28

1 and other misconduct.⁷

2 e. Riverside city councilwoman Clarissa Cervantes filed a defamation
3 lawsuit against Defendant Bianco in 2022 for false statements he made
4 about the councilwoman.⁸

5 73.As a direct, foreseeable, and proximate result of Defendant's unlawful actions,
6 Mr. Miller has suffered substantial mental and emotional distress,
7 embarrassment, and overall discomfort.

8 74.Defendants committed the acts herein with malice against Mr. Miller with the
9 wrongful intention of injuring Mr. Miller with conscious disregard to his health,
10 safety, and rights.

11 75.WHEREFORE, Plaintiff requests relief as hereafter provided

12 **THIRD CAUSE OF ACTION**

13 **42 U.S.C. § 1983 - Failure to Intervene**

14 **(Against Defendant County of Riverside and DOES 1-100)**

15 76.Plaintiff re-alleges as though set forth herein the allegations of Paragraphs 1
16 through 55, and 58 through 60.

17 77.The elements of a Failure to Intervene cause of action are: (1) officer present at
18 scene of constitutional violation, (2) officer had opportunity to intervene, (3)
19 officer failed to intervene; and (4) constitutional violation occurred.

20 78.Deputy Coronado and additional officers were present during Mr. Miller's
21 detention and search. Multiple officers: (1) witnessed Mr. Miller's medical
22 distress, (2) witnessed and participated in the unauthorized medical exam of Mr.

23
24 ⁷ *Attorney General Bonta Launches Civil Rights Investigation into Riverside County*
25 *Sheriff's Office* (February 23, 2023) [https://oag.ca.gov/news/press-releases/attorney-](https://oag.ca.gov/news/press-releases/attorney-general-bonta-launches-civil-rights-investigation-riverside-county)
26 [general-bonta-launches-civil-rights-investigation-riverside-county](https://oag.ca.gov/news/press-releases/attorney-general-bonta-launches-civil-rights-investigation-riverside-county)

27 ⁸ Tom Coulter, *Riverside councilwoman files libel suit against Sheriff Chad Bianco*
28 *over vandalism comments*, Desert Sun (Oct. 1, 2022),
[https://www.desertsun.com/story/news/crime_courts/2022/10/01/riverside-](https://www.desertsun.com/story/news/crime_courts/2022/10/01/riverside-councilwoman-clarissa-cervantes-libel-suit-sheriff-chad-bianco/8152766001/)
[councilwoman-clarissa-cervantes-libel-suit-sheriff-chad-bianco/8152766001/](https://www.desertsun.com/story/news/crime_courts/2022/10/01/riverside-councilwoman-clarissa-cervantes-libel-suit-sheriff-chad-bianco/8152766001/)

1 Miller, and (3) were aware of Mr. Miller's request for his statutory phone call.

2 79.The officers failed to intervene: (a) no action was taken to limit excessive search
3 scope/duration; (b) no intervention was made to provide medical care; (c) no
4 intervention was made to halt the unauthorized medical exam of Mr. Miller; and
5 (d) express refusal to accommodate Mr. Miller's statutory rights.

6 80.Constitutional violations occurred: (a) Fourth Amendment violation through
7 search/seizure as described above; and (b) procedural due process violations
8 through Defendants denial of Mr. Miller's statutory rights.

9 WHEREFORE, Plaintiff requests relief as hereafter provided.

10 **FOURTH CAUSE OF ACTION**

11 **Slander Per Se**

12 **(Against Defendants Bianco and Riverside County)**

13 81.Plaintiff re-alleges as though set forth herein the allegations of Paragraphs 1
14 through 55.

15 82.The elements of slander per se are: (1) a false and unprivileged publication; (2)
16 orally uttered to a person; and (3) naturally tending directly to injure a person;
17 (4) slander per se statements include: charging the commission of crime, tending
18 directly to injure a plaintiff in respect to the plaintiff's business by imputing
19 something with reference to the plaintiff's business that has a natural tendency to
20 lessen its profits, or by natural consequence, causes actual damage. California
21 Civil Code Section 46; *Mann v. Quality Old Time Serv., Inc.* (2004) 120 Cal.
22 App. 4th 90; *Burrill v. Nair* (2013) 217 Cal.App.4th 357, 358 ("accusations of
23 crime were defamatory per se and were specific enough that they were not mere
24 hyperbole").

25 83.Defendant Bianco made unprivileged oral statements during his:

- 26 a. Interview with the Southern California News Group.
27 b. Public press conference on October 13, 2024.
28 c. Fox News national television appearance on October 14, 2024.

1 d. Resulting in widespread media dissemination.

2 e. His April 12, 2025 appearance.

3 f. His May 1, 2025, podcast appearance.

4 84. Defendant Bianco made false statements about Mr. Miller when he:

5 a. Falsely claimed that Mr. Miller said “he was going to kill the president.”

6 b. Falsely claimed Mr. Miller was a “would-be Trump assassin.”

7 c. Falsely alleged Mr. Miller of possessing false identification

8 d. Falsely alleged Mr. Miller had fake press credentials.

9 e. Falsely alleged Mr. Miller had extremist affiliations.

10 85. The false statements were slanderous per se:

11 a. The false claim that Mr. Miller said “*he was going to kill the president*” is
12 prima facie slander per se.

13 b. “Would-be Trump assassin” is commonly understood as an attempted
14 assassination, as the media headlines show. Especially in light of the two
15 temporally connected actual attempted assassinations of President Trump.⁹
16 Attempted assassination of a major presidential candidate is a very serious
17 federal crime under 18 U.S.C. § 1751.

18 c. The false accusation that Mr. Miller possessed and presented false
19 identification and fake press credentials is identity fraud, a crime under
20 California Penal Code Sections 529 and 148.9.

21 d. The false statement that Mr. Miller had extremist affiliations is naturally
22 causing harm due to our society’s rejection of such groups.

23 86. Defendant Bianco knew or, with reckless disregard for the truth, should have
24 known that the statements were false:

25 a. Mr. Miller announced to RCSD deputies two times that he had firearms.
26 No reasonable person would believe that someone intending to kill the
27

28 ⁹ Ryan Wesley Routh Indicted for Attempted Assassination of Former President Trump, U.S. Department of Justice (Sept. 24, 2024), <https://www.justice.gov/archives/opa/pr/ryan-wesley-routh-indicted-attempted-assassination-former-president-trump>

1 President would announce his firearms before committing the crime.

2 b. FBI and Secret Service declined to interview Mr. Miller because he was
3 deemed to be non-threatening.

4 c. Defendant Bianco knew the federal agencies had dismissed assassination
5 theory.

6 d. Mr. Miller possessed legitimate identification documentation.

7 e. Mr. Miller never stated that he was a “sovereign citizen.”

8 f. Mr. Miller did not have a loaded handgun under his seat.

9 87. Defendant failed to use reasonable care to determine truth:

10 a. Defendant Bianco proceeded despite knowledge of federal agencies'
11 assessment.

12 b. Defendant Bianco with reckless disregard for the truth, allegedly relied on
13 only one deputy who informed him of the falsely attributed statement to
14 Mr. Miller.

15 c. Defendant Bianco made statements for his own political advancement and
16 media opportunities.

17 d. Defendant Bianco clearly demonstrated reckless disregard for factual
18 accuracy with his own contradictions and failure to determine facts before
19 spreading them to the media and beyond.

20 88. Mr. Miller suffered harm, including:

21 a. International media coverage as potential presidential assassin.

22 b. Forced relocation due to threats resulting from the false statements.

23 c. Severe reputational damage affecting livelihood.

24 d. Family relationship severance.

25 e. Ongoing harassment and threats.

26 89. Statements were substantial factor in causing Mr. Miller's harm:

27 a. Prima facie direct causal connection between Sheriff Bianco's statements
28 and Mr. Miller's damages.

1 b. Specific documented damages resulting from Sheriff Bianco's statements.

2 90. WHEREFORE, Plaintiff requests relief as hereafter provided.

3 **FIFTH CAUSE OF ACTION**

4 **Libel Per Se**

5 **(Against Defendants Bianco and Riverside County)**

6 91. Plaintiff re-alleges as though set forth herein the allegations of Paragraphs 1
7 through 55.

8 92. The elements of libel per se are: (1) a false and unprivileged publication; (2) by
9 writing; and (3) naturally tending directly to injure a person; (4) libel per se
10 statements are those "without the necessity of explanatory matter, such as an
11 inducement, innuendo or other extrinsic fact." California Civil Code Sections 45,
12 45a.

13 93. Defendant Bianco texted the Epoch Times the malicious, false statement
14 regarding Mr. Miller, "He was going to kill the president."

15 94. Defendant Bianco with reckless disregard for the truth, allegedly relied on only
16 one deputy who informed him of the falsely attributed statement to Mr. Miller.
17 Defendant Bianco later tried to blame the FBI and Secret Service for that false
18 information.

19 95. A sheriff alleging an attempted assassination of a major presidential candidate
20 needs no explanation, as it is prima facie libelous and harmful to Mr. Miller.

21 96. WHEREFORE, Plaintiff requests relief as hereafter provided.

22 **SIXTH CAUSE OF ACTION**

23 **Intentional Infliction of Emotional Distress**

24 **(Against Defendants Bianco and Riverside County)**

25 97. Plaintiff re-alleges as though set forth herein the allegations of Paragraphs 1
26 through 55, 58-60, 83-87, and 93-95.

27 98. The elements of Intentional Infliction of Emotional Distress are: "(1) extreme and
28 outrageous conduct by the defendant with the intention of causing, or reckless

1 disregard of the probability of causing, emotional distress, (2) plaintiff's
2 suffering severe or extreme emotional distress; and (3) actual and proximate
3 causation of the emotional distress by the defendant's outrageous conduct."
4 *Hughes v. Pair*, 46 Cal. 4th 1035, 1050-1051 (2009).

5 99. Defendants' conduct constitutes extreme and outrageous behavior exceeding all
6 bounds of decency tolerated in a civilized society, as evidenced by:

- 7 a. Defendant Bianco's deliberate and calculated decision to publicly label Mr.
8 Miller as a "would-be presidential assassin" despite contemporaneous
9 knowledge that federal authorities had explicitly declined to investigate
10 Mr. Miller as a potential threat, constituting conduct so extreme as to be
11 utterly intolerable in a civilized society.
- 12 b. The timing of Defendant Bianco's false accusations during the heightened
13 political tensions of the final weeks of a presidential election cycle, a
14 period when Defendants knew or should have known such accusations
15 would generate maximum public outrage and threaten Mr. Miller's safety.
- 16 c. Defendants' exploitation of Mr. Miller's status as a documented supporter
17 of President Trump to create a particularly damaging narrative of
18 "betrayal" that Defendants knew would subject Mr. Miller to unique forms
19 of public hatred and condemnation.
- 20 d. Defendants' reckless disregard for the entirely foreseeable consequences
21 of falsely labelling someone as an attempted presidential assassin in the
22 contemporary political climate, including death threats, family
23 estrangement, and professional destruction that have forced Mr. Miller to
24 change his life.
- 25 e. Defendant Bianco's calculated expansion of defamatory statements into
26 multiple high-profile national media appearances, demonstrating a
27 deliberate intent to maximize harm rather than isolate it to local
28 jurisdictions.

1 f. Defendant Bianco's on-going statements at events and in media
2 appearances which demonstrate his knowledge of the severity of his
3 statements and the damage it has been causing.

4 100. The extraordinary severity of emotional distress inflicted by Defendant
5 Bianco's conduct, including, but not limited to: (i) acute psychological trauma,
6 (ii) profound social isolation, (iii) persistent fear for personal safety, (iv)
7 severance of parent-child relationships, and (v) comprehensive destruction of
8 professional identity and livelihood prospects, all of which no reasonable person
9 should be expected to endure.

10 101. There is a clear, direct connection between Sheriff Bianco's statements and the
11 ongoing media coverage of Mr. Miller which have resulted in specific damages
12 flowing from public allegations and the ongoing consequences of nationwide
13 publicity harming Mr. Miller's reputation and professional opportunities, severe
14 mental distress, and other harms to be proven at trial.

15 102. WHEREFORE, Plaintiff requests relief as hereafter provided.

16
17 **PRAYER FOR RELIEF**

18 103. Plaintiff prays this Honorable Court to declare and adjudge that Defendants'
19 conduct alleged herein constitutes violations of Plaintiff's constitutional rights
20 under the First, Fourth, Fifth, and Fourteenth Amendments to the United States
21 Constitution; statutory violations under 42 U.S.C. § 1983 and California Civil
22 Code § 52.1; and tortious conduct constituting defamation per se, false light
23 invasion of privacy, and intentional infliction of emotional distress under
24 California law, all of which have caused Plaintiff to suffer severe, continuing,
25 and irreparable damages to his reputation, employment prospects, family
26 relationships, personal safety, and psychological well-being.

27 WHEREFORE, Plaintiff prays for Judgment against Defendant as follows:

28 A. To declare Defendants' actions unlawful;

- 1 B. Order that the Defendants pay Plaintiff compensatory damages, including
2 but not limited to, lost back pay and benefits plus interest, according to
3 proof;
4 C. For general and special damages;
5 D. For punitive damages, as allowed by law, that will sufficiently punish,
6 make an example of, and deter future conduct by Defendants;
7 E. For B, C, and D in an amount not less than \$100,000,000;
8 F. Order that the Defendants pay the Plaintiff's attorney fees and costs of this
9 litigation, related litigation, and of the preceding administrative actions at
10 the Agency level;
11 G. For an award of pre-judgment and post-judgment interest; and
12 H. For such other and further relief as the Court deems just and proper.

13
14 **JURY DEMAND**

15 Plaintiff demands a trial by jury on all issues so triable.
16

17
18 DATED: May 7, 2025

Respectfully submitted,
THE BEARMAN FIRM, INC.

20 By: 
21 _____

22 ETHAN BEARMAN
23 Attorney for Plaintiff
24 VEM MILLER
25
26
27
28