

1 ERIC G. YOUNG, ESQ. (SBN 190104)  
2 **YOUNG LAW GROUP**  
3 2544 Cleveland Avenue, Suite 210  
4 Santa Rosa, California 95403  
5 Tel.: 707.343.0556  
6 Fax: 707.327.4360  
7 Email: [eyoung@younglawca.com](mailto:eyoung@younglawca.com)  
8 E-Service: [service@younglawca.com](mailto:service@younglawca.com)

9 Attorneys for Plaintiff  
10 KENI MAE MEYER

11 **UNITED STATES DISTRICT COURT**

12 **NORTHERN DISTRICT OF CALIFORNIA – OAKLAND DIVISION**

13 KENI MAE MEYER, an individual,  
14 Plaintiff,  
15 vs.

16 COUNTY OF SONOMA, a municipal  
17 corporation; TENNIS WICK, in his  
18 individual and official capacities; TYRA  
19 HARRINGTON, in her individual and official  
20 capacities; TODD HOFFMAN, in his  
21 individual and official capacities; RYAN  
22 SHARP, in his individual and official  
23 capacities; CHRIS MARTINEZ, in his  
24 individual and official capacities; and DOES  
25 1-50, inclusive.

26 Defendants.

CASE NO.:

**COMPLAINT FOR DECLARATORY  
RELIEF, INJUNCTIVE RELIEF,  
AND DAMAGES**

- 1) **42 U.S.C. § 1983 - VIOLATION OF 4<sup>TH</sup> AND 14<sup>TH</sup> AMENDMENTS, U.S. CONSTITUTION;**
- 2) **42 U.S.C. § 1983, VIOLATION OF 8<sup>TH</sup> AND 14<sup>TH</sup> AMENDMENTS, U.S. CONSTITUTION;**
- 3) **MONELL LIABILITY;**
- 4) **VIOLATION OF CALIFORNIA CONST., ART. I, § 1 – RIGHT OF PRIVACY**
- 5) **TRESPASS TO LAND**
- 6) **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

**JURY TRIAL DEMANDED**

27 *“The proliferation of government snooping and data collecting is threatening to  
28 destroy our traditional freedom. Government agencies seem [sic] to be competing to  
compile the most extensive sets of dossiers of American citizens. Computerization of  
records makes it possible to create “cradle-to-grave” profiles on every American. At  
present there are no effective [restraints] on the information activities of government  
and business. This amendment creates a legal and enforceable right of privacy for  
every Californian.” – State of California, 1972 Ballot Pamphlet, p. 26, Prop 11, Right to  
Privacy (See, **Exhibit A.**)*



1 **COMES NOW**, Plaintiff KENI MAE MEYER (“Meyer”) to the best of her knowledge,  
2 information, and belief formed after an investigation reasonable under the circumstances,  
3 which facts are likely to have evidentiary support after a reasonable opportunity for further  
4 investigation and discovery, except for information identified herein based on personal  
5 knowledge, hereby alleges as follows against the above-named Defendants, and each of them:  
6

7 **I.**

8 **INTRODUCTION**

- 9  
10 1. This action seeks compensatory, punitive, and nominal damages as well as  
11 injunctive and declaratory relief to redress violations of the Fourth, Eighth, and  
12 Fourteenth Amendments to the United States Constitution, made actionable against  
13 Defendants, and each of them, by the Civil Rights Act of 1872, 42 U.S.C. § 1983,  
14 which violations were caused by Defendants, and each of them, acting under color  
15 of law, to undertake, promote, encourage, implement, or enforce unconstitutional or  
16 unlawful actions, policies, practices, procedures, ordinances, resolutions, patterns  
17 of conduct, customs and usage of regulations adopted, employed or ratified by  
18 policy-making supervisors, managers, or decision-makers acting on behalf of  
19 Defendant COUNTY OF SONOMA (“the County”) in doing or causing each of the  
20 following to occur, or ratifying or approving of same:  
21

22 **II.**

23 **THE PARTIES**

- 24  
25 2. At all times relevant herein, Meyer was an individual who either resided at 639  
26 Duer Road, Sebastopol, California 95472 (“the subject property”); or was, and  
27 is, the owner of record of the subject property, and was, and is, entitled to the  
28

1 full panoply of rights, privileges, and protections of the United States  
2 Constitution, the California Constitution as well as statutory and common law.

- 3  
4 3. Defendant TENNIS WICK (“Wick”) is the Director of the County’s Permit Resource  
5 Management Department (a.k.a. “Permit Sonoma”), a municipal agency within the  
6 County, which includes a Code Enforcement Division (“CED”) that investigates and  
7 enforces local building and zoning codes and regulations. By reason of the authority  
8 vested in him by the Sonoma County Code of Ordinances, Chapter 7, Art. I, Sec. 7-2,  
9 Wick is “the Chief Building Official” for and on behalf of the County. Section 7-2  
10 further provides:

11  
12 “The chief building official shall be the director of the permit and resource  
13 management department or his or her designee. The chief building official  
14 shall supervise and be responsible for all inspection work required for the  
15 proper enforcement of regulations imposed by this chapter except those  
16 duties specifically delegated herein to the county public health officer. The  
17 chief building official shall perform related duties as directed by the board  
of supervisors. The chief building official shall appoint such deputies and  
assistants as may be authorized by the board of supervisors.”

18 (Ord. No. 5754 § 1 (b), 2007: Ord. No. 5399 § 1, 2003: Ord. No. 4906 § 3, 1995.)

- 19 4. On information and belief, in this official capacity, Wick has rule-making authority  
20 over Permit Sonoma which was delegated to him by the County Board of  
21 Supervisors, specifically including authority to write and implement official policies  
22 for CED. Wick is sued in his individual and official capacities.  
23  
24 5. Defendant TYRA HARRINGTON (“Harrington”) was, and is, the Code  
25 Enforcemebnt Manager for CED. On information and belief, in this official capacity,  
26 Harrington has unfettered discretion to implement official policies for CED as well  
27 as directing, supervising, and ratifying the actions of CED’s code enforcement  
28

1 officers including those named herein. Harrington is sued in her individual and  
2 official capacities.

3  
4 6. Defendant TODD HOFFMAN (“Hoffman”) was, and is, a Senior Code Enforcement  
5 Inspector with CED. In this official capacity, Hoffman, among other official duties,  
6 pilots or assists in piloting one or more unmanned aerial vehicles (UAVs), commonly  
7 known as “drones,” which are owned by the County and used by CED to surveil  
8 private property of landowners in the County without warrants, consent, or exigent  
9 circumstances, pursuant to the County’s unlawful and unconstitutional policies as  
10 more fully alleged herein, including warrantless surveillance of Plaintiff’s private  
11 property. Hoffman is sued in his individual and official capacities.

12  
13 7. Defendant JESSE CABLK (“Cablk”) is now the Code Enforcement Supervisor with  
14 CED. Prior to achieving this promotion from the County in or about October or  
15 November 2024, Cablk had been a Code Enforcement Inspector of some rank with  
16 CED. In this official capacity, Cablk, among other official duties, pilots or assisted in  
17 piloting one or more unmanned aerial vehicles (UAVs), commonly known as  
18 “drones,” which are owned by the County and used by CED to surveil private  
19 property of landowners in the County without warrants, consent, or exigent  
20 circumstances, pursuant to the County’s unlawful and unconstitutional policies as  
21 more fully alleged herein, including warrantless surveillance of Plaintiff’s private  
22 property. Cablk is sued in his individual and official capacities.

23  
24  
25 8. Defendant RYAN SHARP (“Sharp”) was, and is, a Code Enforcement Inspector I  
26 with CED. In this official capacity, Sharp, among other official duties, pilots or  
27 assisted in piloting one or more unmanned aerial vehicles (UAVs), commonly known  
28 as “drones,” which are owned by the County and used by CED to surveil private



1 property of landowners in the County without warrants, consent, or exigent  
2 circumstances, pursuant to the County’s unlawful and unconstitutional policies as  
3 more fully alleged herein, including warrantless surveillance of Plaintiff’s private  
4 property. Sharp is sued in his individual and official capacities.<sup>1</sup>  
5

6 9. Defendant CHRIS MARTINEZ (“Martinez”) was, and is, an Animal Services Officer  
7 with the County’s Animal Services. His official rank, title and full job description are  
8 not known at this time. In his official capacity as an officer with Animal Services,  
9 however, Martinez intruded upon the private land of Plaintiff without a warrant,  
10 consent, or exigent circumstances, in a surreptitious manner, and refused to leave  
11 the property when requested to do so by Plaintiff, as more fully alleged herein.  
12 Martinez is sued in his individual and official capacities.  
13

14 10. Meyer does not know the true names and capacities of those defendants sued herein  
15 as DOES 1-50, inclusive, whether they be individuals, agents, representatives,  
16 corporations, associates, partners, departments, subdivisions, or other business or  
17 governmental entities, and therefore, Meyer sues these defendants by fictitious  
18 names. Meyer is informed and believes, and thereon alleges, that each of these  
19 fictitiously named defendants has harmed Meyer, or caused damage to Meyer,  
20 through varied intentional Constitutional violations and deprivations, or they have  
21 violated state or common law, in a manner that is equally reprehensible, outrageous,  
22 and vindictive as those Defendants named herein. Meyer will seek leave to amend  
23 this Complaint to set forth the true names and capacities of such defendants when  
24 the information is ascertained.  
25  
26  
27

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28 <sup>1</sup> Attached hereto as **Exhibit B** for reference only is a true and correct copy of Permit Sonoma’s most current Organizational Chart obtained from the County’s official website on December 13, 2024.



1 11. Meyer is informed and believes, and thereon alleges, that each of the Defendants  
2 named herein, including defendants sued herein as DOES 1-50, inclusive, in some  
3 legally recognizable manner acted in concert with, as the agent of, employee,  
4 representative, or assign of each of the other Defendants; or the conduct of the  
5 Defendants named herein, including defendants sued herein as DOES 1-50,  
6 inclusive, was done at the behest of the other Defendants, with their express or  
7 implied approval, encouragement, acquiescence, or was ratified by the other  
8 Defendants, and each of them, after the fact.  
9

10 **III.**

11 **JURISDICTION & VENUE**

12  
13 12. This Court has jurisdiction over the claims set forth in this Complaint pursuant to  
14 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1343 (deprivation of civil rights and  
15 conspiracies), 28 U.S.C. § 2201 (declaratory relief), and 42 U.S.C. § 1983 (civil rights  
16 violations actionable against states). This Court has supplemental jurisdiction over  
17 the pendent state law claims pursuant to 28 U.S.C. § 1367.  
18

19 13. Venue in this Court is proper pursuant to 28 U.S.C. §1391b in that at least one  
20 Defendant resides in this District, and the events giving rise to Meyer's claims  
21 occurred in this District.  
22

23 **IV.**

24 **COMPLIANCE WITH GOVT TORT CLAIMS PROCEDURES**

25 14. To the extent required to do so, Meyer has complied with all pre-lawsuit notice  
26 requirements applicable to public entities or their employees prior to filing this  
27 action.  
28

V.

**FACTUAL BACKGROUND**

**(A) Legalization of Recreational Cannabis as Legislative Backdrop**

15. Although Meyer has, herself, never been affiliated with, associated with, involved in, or accuse of the operation of a cannabis grow in the County, the facts of her case, nevertheless, are inextricably tied to the manner in which the County acted to regulate such grows following the legalization of recreational use cannabis in the state. Thus, some discussion of the legislative backdrop of cannabis is warranted.

16. On November 8, 2016, Proposition 64, passed by a 57% to 43% vote, legalizing the use, sale, and cultivation of recreational cannabis in California for adults 21 and over. The following year, the California Legislature effectively codified the Proposition into the provisions of the Adult Use of Marijuana Act, creating a single regulatory framework, termed the Medical and Adult-Use Cannabis Regulatory and Safety Act.

17. California counties were purportedly authorized to enact ordinances regulating the cultivation of cannabis. From sometime in December 2016 to July 2017, the County opened up applications for cannabis grow permits, which were issued through Permit Sonoma. Some of the first permits were issued in July 2017.

18. At that time, the Chairwoman of the Sonoma County Growers Alliance and the California Growers Association, Tawnie Logan, estimated that there were about 5,000 cannabis grow operations in the County. In an article published in the North Bay Biz Journal on July 6, 2017 Logan “commended the county for being among the first to adopt such a plan. And she said the fees were modest compared to other jurisdictions like Desert Hot Springs in Southern California, which charges five times



1 as much for a similar permit and development application.” (See **Exhibit C**,  
2 attached hereto and incorporated herein.)

3 19. On information and belief, between July 2017 and October 2018, the County, acting  
4 through Permit Sonoma, collected thousands of applications from individuals who  
5 were cannabis growers prior to legalization who were interested in operating  
6 legitimately. Most of these individuals operated small cannabis grows.

7  
8 20. On or about October 16, 2018, the County modified its local ordinance with  
9 Ordinance Number 6245 (“the ordinance”) regulating the cultivation of medical  
10 marijuana. The Ordinance imposed extraordinarily complex requirements for  
11 obtaining a permit to cultivate cannabis. The minimum cost of obtaining a permit  
12 was at least \$50,000, and in many cases far higher. The permit, even if obtained, was  
13 good for one to five years and subject to revocation by the County.

14  
15 21. The complexity and cost of obtaining a license to cultivate cannabis in The County  
16 was without any rational basis. Many small growers were present in The County prior  
17 to enactment of the Ordinance and posed little if any threat to public health and  
18 safety. These were ordinary agricultural operations, and not methamphetamine  
19 laboratories subject to explosions.

20  
21 22. Because the County priced the cost of obtaining a permit to cultivate cannabis at a  
22 prohibitively costly level, very few of the individuals who requested information  
23 and/or forms regarding licensure completed the applications, and even fewer were  
24 awarded permits.

25  
26 23. The Ordinance, in addition to setting the cost of entry for licensed cannabis  
27 cultivation at a prohibitively costly level, also imposed draconian penalties for even  
28 suspected unlicensed cultivation. This was designed both to protect the large scale



1 growers and to enable the County to bleed money from landowners. (See Ordinance  
2 section 26-88-252 entitled “Enforcement.”) The Ordinance provided that each day  
3 that an unlicensed condition existed constituted a separate offense, and that the fine  
4 for such violations was up to \$10,000 per day for a first violation, up to \$25,000 per  
5 day for a second violation, and up to \$50,000 per day for a third violation.

6  
7 24. With regard to the evidence that could subject a person to the above extraordinary  
8 fines, the Ordinance provided that “Sheriff reports, on-line searches, citations, aerial  
9 photos or neighbor documentation may constitute proof of a violation.”

10  
11 25. The Ordinance further provided that where an inspector, purportedly inspecting for  
12 unlicensed cannabis cultivation, discovered violation of a county code or zoning  
13 standard, remediation of the use or structure would be subject to confiscatory fees.  
14 “In the event that the use or structure in violation may be permitted with an  
15 appropriate permit up to a maximum of fifty (50) times the amount of the standard  
16 fee for each approval, review and permit [may be charged].” This provision was  
17 designed to, and did, empower the County to prevent remediation by making the  
18 necessary permit(s) prohibitively costly, thereby causing huge daily fines to  
19 accumulate. Upon information and belief, the 50X multiplier was reduced to a 10X  
20 multiplier in September of 2020, but the County often applies the higher multiplier  
21 retroactively.  
22

23  
24 26. Upon information and belief, the County Board of Supervisors was influenced by  
25 large scale cannabis growers, who had pre-existing operations, to shift gears, enact  
26 the Ordinance, and set the cost of entry and remaining in business at a prohibitively  
27 costly level. These large scale growers sought to prevent smaller scale operations from  
28 entering the market and competing with them.



1 27. Upon further information and belief, armed with a ready list of “interested persons”  
2 who had essentially stepped forward and admitted they were already engaged in  
3 growing cannabis, the County saw an opportunity to use the powers of CED to  
4 generate massive sums of money through the imposition of financially devastating  
5 fines and crippling penalties against those individuals. What began as the County’s  
6 open invitation to its citizens to legitimize cannabis grows became a government  
7 sanctioned sting operation.  
8

9 **(B) Sonoma County Enacts Unlawful Code Enforcement Enhancement**  
10 **Program**

11 28. On information and belief, the County had always known the money-making  
12 opportunity legalized recreational cannabis presented and intended this result. On  
13 March 27, 2017, under the moniker “Code Enforcement Enhancement Program”  
14 (“CEEP”), County Counsel (at the time, Bruce Goldstein) and Defendant Wick  
15 presented Agenda Item 26 to the County Board of Supervisors, which was approved.  
16 Attached hereto as **Exhibit D**, and incorporated herein, is a true and correct copy  
17 of Agenda Item 26.  
18

19 29. It was asserted in Agenda Item 26 that CEEP was needed to address Permit Sonoma  
20 staffing reductions that had occurred in previous years, which had allegedly led to a  
21 decrease in revenue generated by Permit Sonoma for the County.  
22

23 30. Rather than being a “program” to hire more Code Enforcement Inspectors to  
24 address the alleged backlog of cases and revenue shortfall, CEEP proposed hiring  
25 one Code Enforcement Manager, which ultimately turned out to be Defendant  
26 Harrington, who on information and belief is a former Deputy Sheriff with the  
27 Sonoma County Sheriff’s Department.  
28

1 31. According to CEEP, Defendant Harrington’s mandate is “to oversee and coordinate  
2 violation remediation efforts to both increase cost recovery and reduce case  
3 backlog.” (Exhibit D, “Recommended Actions,” (A), page 1 of 8, emphasis added.)

4 In other words, Defendant Harrington’s job was, and is, to increase the revenue  
5 generated by Permit Sonoma for the County. Indeed, according to CEEP, 100% of  
6 Defendant Harrington’s salary, which on information and belief was or is at least  
7 \$154,292 (as of 2018) or more in salary and benefits annually<sup>2</sup>, was expected to be  
8 generated from increases in cost recovery. (Exhibit D, “Executive Summary,” page 4  
9 of 8; “Narrative Explanation of Fiscal Impacts,” page 7 of 8, emphasis added.)

10 32. On information and belief, CEEP, which represents official County policy set into  
11 effect by the County Board of Supervisors, gave, and continues to give, a powerful  
12 incentive and motivation to Defendant Harrington to not only aggressively pursue  
13 “cost recovery” on behalf of the County herself, but to instigate, encourage, or  
14 mandate those working under her at PRMD, such as Defendants Franceschi,  
15 Hoffman, Smith, Cablk, and others, including DOES 1-50, to aggressively generate  
16 as much revenue as possible for the County. Indeed, the policy inasmuch  
17 encourages this by stating:

- 18 • “Aggressive code enforcement actions can also serve as an upstream  
19 investment...” (Exhibit D, “Executive Summary,” page 1 of 8.)
- 20 • “[T]his item recognizes the effectiveness of quick and aggressive  
21 litigation to resolve violations...” (Exhibit D, “Executive Summary, page 2  
22 of 8.)

23  
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26  
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<sup>2</sup> <https://calsalaries.com/tyra-harrington-4899625>.



1 • “The decline in cases and corresponding decline in [cost] recovery is due  
2 to the elimination of the Division manager and reduction in staffing.”

3 (Exhibit D, “Discussion,” page 3 of 8.)

4 • “The new manager position will facilitate the resolution of more  
5 complaints, as well as more Code Enforcement cases going to hearing,  
6 which together are expected to generate approximately \$600,000 per year  
7 in additional cost recovery (\$12,000 per hearing with an additional 50  
8 cases going to hearing.” (Exhibit D, “Discussion,” page 4 of 8.)

9  
10 33. Additionally, CEEP proposed what it called “a number of minor policy  
11 modifications and delegations” and “policy modifications to increase effectiveness.”  
12 (Exhibit D, “Executive Summary, page 2 of 8; “Discussion,” page 5 of 8.) What this  
13 innocuous sounding phrase means is that the County Board of Supervisors  
14 delegated their authority to “bypass the administrative process” and file a lawsuit to  
15 abate any violations. This delegation of authority gave Defendant Wick, together  
16 with County Counsel, the unfettered authority to declare property uses as  
17 constituting “an immediate threat to public health and/or safety” with no guidance  
18 on to how they were to define these terms.

19  
20  
21 34. Furthermore, CEEP proposed to “streamline” the administrative hearing process”  
22 by creating an “Administrative Citation Program.” In effect, this proposal, which  
23 was also approved as official policy by the County’s Board of Supervisors, allowed  
24 Permit Sonoma to simply bypass certain procedural steps the department had  
25 previously taken when dealing with property owners, and instead, encouraged  
26 Permit Sonoma to immediately cite property owners with violations and assess  
27 penalties of one kind or another. Stated differently, this Administrative Citation  
28

1 Program conferred a virtually unfettered right on the part of Defendants Wick and  
2 Harrington to speed up the cost recovery process, and increase “citation fee  
3 revenue” while running roughshod over the constitutional due process rights of  
4 property owners within the jurisdiction of the County.  
5

6 35. On information and belief, CEEP was not fully implemented by the County until late  
7 in 2018. In the interim, on the night of October 8, 2017, a historic wind event led to  
8 one of the worst firestorms in Sonoma County history, followed by almost three  
9 weeks of fire. In total, the Nuns, Tubbs, and Pocket Fires (together comprising the  
10 Sonoma Complex Fire) burned over 110,700 acres in Sonoma and Napa counties. 24  
11 lives were lost as a result of the fires. 6,997 structures were destroyed, resulting in  
12 direct losses exceeding \$7.8 billion according to the California Insurance  
13 Commissioner. 25% of the destruction occurred on protected or open land in  
14 Sonoma County.  
15

16 36. The cost to the County itself totaled at least \$18.1 million. On information and  
17 belief, a significant portion of the County’s Code Enforcement efforts were diverted  
18 as a result of the Sonoma Complex Fires, which explains in part why CEEP’s  
19 implementation was delayed until late in 2018.  
20

21 **(C) Permit Sonoma Comes Under Fire From Local Press for Over-**  
22 **Promising and Under-Delivering Through CEEP**

23 54. On August 9, 2019, a local reporter, Tyler Silvy, authored an unflattering article in  
24 the Sonoma County Press-Democrat, accusing Wick as head of Permit Sonoma with  
25 over-promising and under-delivering through what started as the CEEP policy.  
26 Attached hereto as **Exhibit E**, and incorporated herein, is a true and correct copy of  
27 Silvy’s article downloaded from the Sonoma County Press-Democrat website.  
28

55. According to the article, the program had been implemented for approximately one



1 year, and only 2 administrative citations had been issued; yet, according to Silvy,  
2 the program had cost the County thousands of dollars. On information and belief,  
3 pressure from bad press such as Silvy’s article also prompted Defendants and the  
4 County to step up their Code Enforcement activities, at whatever cost to the  
5 constitutional rights of property owners in the County.  
6

7 **(D) County Promulgates Standard Operating Procedures on the Use of**  
8 **Unmanned Aircraft Systems (UAS) (a.k.a. “Drones”)**

9 56. Shortly afterwards, on or about September 10, 2019, the County, acting through  
10 Permit Sonoma, promulgated a five-page policy and procedure document entitled  
11 “7.0 Standard Operating Procedures on the Use of Unmanned Aircraft Systems (UAS)  
12 (i.e., “drones”) (“the drone policy”). Attached hereto as **Exhibit F**, and incorporated  
13 herein, is a true and correct copy of the drone policy.  
14

15 57. “UAS,” or “Unmanned Aircraft Systems,” is an acronym that is often associated  
16 with vehicles more commonly described as “drones.” UAS refers to “an aircraft and its  
17 associated elements which are operated with no pilot on board.” “Drones” are also  
18 frequently referred to as UAVs, or “Unmanned Aerial Vehicles.” For simplicity and  
19 consistency herein, Meyer will continue to refer herein to such vehicles and systems  
20 primarily as “drones.”  
21

22 58. According to the United States Department of Defense, “drones” are categorized  
23 as follows :

24 59. Drones can also be classified based on range and endurance, size, weight,  
25 altitude, and degree of autonomy. Some drones are remotely piloted aircraft, some  
26 offer intermediate degrees of autonomy, and some are fully autonomous. At this  
27 time, it is not known what category of drones the County has acquired for Permit  
28 Sonoma; only that it has acquired one or more drones, nor is it known specifically



1 what capabilities these drones have. On information and belief, however, Permit  
2 Sonoma's drones are remotely controlled but may have some features that are semi-  
3 autonomous. On further information and belief, Permit Sonoma's drones have the  
4 ability to fly at altitudes that are above 400 feet and below 400 feet, take high-  
5 resolution digital photographs, and record high-resolution video footage. In all  
6 respects, Permit Sonoma's drones, when used to conduct inspection searches of  
7 private property, enhance the senses of Code Enforcement officers such as the  
8 Defendants beyond what an ordinary human is capable of, and as such, require a  
9 warrant prior to their use to inspect and search private property. (Florida v. Jardines,  
10 569 U.S. 1, 133 S. Ct. 1409 (2013); Kyllo v. United States, 533 U.S. 27 (2001).)

11  
12  
13 60. The County's drone policy was authored, at least primarily, by Defendant  
14 Harrington, and Defendant Harrington also reviewed the drone policy. The drone  
15 policy was reviewed by County Counsel's office acting through Holly Rickett, who is  
16 not named as a Defendant herein. Most importantly, however, the drone policy was  
17 approved by Defendant Wick acting in his capacity as Permit Sonoma Director,  
18 evidencing Defendant Wick's role as the policy-making official for the County's  
19 Permit & Resources Management Department as further alleged herein.

20  
21 61. The County operates one or more websites available to the public which discuss a  
22 variety of topics related to the County's many activities and departments, including  
23 the policies and procedures that apply to the operations of Permit Sonoma.  
24 Significantly, however, the County did not publish its drone policy on the "Internet."  
25 Instead, the drone policy was published solely on the "Intranet." Meyer alleges on  
26 information and belief that the use of the word "Intranet" on page 4 of 5 of Exhibit F  
27 refers to the County's private Intranet. An Intranet is a local, restricted  
28

1 communications network built using World Wide Web software, which is available to  
2 limited numbers of individuals (typically a work group or similar closed group) and  
3 not to members of the general public.

4  
5 62. On information and belief, Meyer alleges the County and Defendants Wick and  
6 Harrington deliberately chose not to publish its new drone policy on the Internet in  
7 order to keep the drone policy, and Permit Sonoma's use of drones to conduct  
8 warrantless searches of private property based on the drone policy, secret from the  
9 people of the County of Sonoma.

10  
11 63. On information and belief, at or about the same time, Permit Sonoma executed a  
12 contract with a private drone operator to conduct aerial surveillance over private  
13 properties in the County of Sonoma through the use of drones. Attached hereto as  
14 Exhibit K, and incorporated herein, is a true and correct copy of an exhibit to that  
15 contract, entitled "Exhibit A: Scope of Work – Services to be Provided." On  
16 information and belief, this contract was awarded to an individual named Anthony  
17 Cinquini ("Cinquini"). At this time, it is not known whether Mr. Cinquini ever  
18 operated a drone to search the subject property; thus, he is not named as a defendant  
19 herein. Meyer reserves the right to amend this Complaint, however, should discovery  
20 reveal Cinquini was involved in such activities, as Meyer may have additional rights  
21 and remedies against Cinquini.  
22

23  
24 64. On information and belief, this contract for a drone operator was not opened for  
25 public bidding because, once again, Defendants desired to keep the drone-related  
26 activities of Permit Sonoma, including the contract referencing the Scope of Work,  
27 secret from the people of the County of Sonoma.

28 65. The County's drone policy and Scope of Work were promulgated prior to a



1 warrantless drone search of the subject property that occurred in the Spring of 2020.  
2 The warrantless drone search of the subject property in March 2020 occurred  
3 pursuant to and was guided by the County’s drone policy. On information and belief,  
4 the March 27, 2020 warrantless use of a drone to search the subject property was  
5 conducted by Defendants Hoffman and Cablk, acting pursuant to the County’s drone  
6 policy, which was, itself, promulgated as part of Agenda Item 26 approved by the  
7 County’s Board of Supervisors, and Defendants Hoffman and Cablk were acting at the  
8 direction and under the supervision of the remaining Defendants, and each of them,  
9 or these Defendants ratified Defendants Hoffman and Cablk’s unconstitutional  
10 actions after they were committed.  
11

12  
13 66. Under its terms, on pages 1-2 of 5, the County’s drone policy provides, in  
14 pertinent part:

15 “Approved Use: Approved Permit Sonoma uses of a UAS include  
16 investigations of complaints received about alleged violations of the  
17 Sonoma County Code. These inspections of unpermitted and/or illegal  
18 land uses include, but are not limited to violations of zoning regulations,  
19 such as cannabis cultivation non-operative motor vehicle storage yards,  
20 and junkyard conditions. A UAS may also be employed for complaints  
21 and/or investigations alleging unpermitted construction, grading, and  
22 drainage improvements/obstructions....  
23

24 Prohibited Use: The UAS video surveillance equipment shall not be used:  
25 to conduct surveillance or inspection activity without a reasonable  
26 suspicion of unpermitted or illegal actions; to target people; to harass,  
27 intimidate, or discriminate against any individual or group; or to conduct  
28



1 personal business of any type....

2 GENERAL

3 Small unmanned aircraft systems (UAS) may be utilized for inspections of  
4 private property to detect violations of the Sonoma County Code when  
5 other means and resources are not available or are less effective. Permit  
6 Sonoma shall make every attempt to respect and observe existing privacy  
7 rights on private property. Permit Sonoma shall only conduct UAS take-  
8 offs and landings from public property or public right of way...

9 Permit Sonoma's use of UAS shall focus primarily on expanses of land  
10 (e.g., "open fields") in which private property owners have knowingly  
11 exposed unpermitted structures and uses to aerial vantage points. While a  
12 Permit Sonoma UAS pilot is operating a UAS they will take steps necessary  
13 to protect privacy and private property rights by (1) turning on  
14 photographic equipment only when the UAS is positioned close to the  
15 suspected violation or unpermitted use; (2) launch UAS as close to the  
16 suspected unpermitted property and/or property use as possible to limit  
17 potential exposure to other properties; (3) ensure all UAS recording  
18 devices are focused on the areas necessary to support the mission and to  
19 minimize the inadvertent collection of data about persons or uninvolved  
20 places. Any inadvertently collected data will be immediately destroyed  
21 upon review by the Code Enforcement Manager or Supervisor.

22 Permit Sonoma will conduct UAS aided inspections on properties where  
23 Permit Sonoma staff has reason to believe unpermitted building or illegal  
24 land use violations are occurring. Reasonable suspicion will be based on  
25  
26  
27  
28



1 citizen complaints and/or staff observations coupled with any other facts  
2 that suggest violation of the Sonoma County Code.

3 Data Retention and Processing

4 All UAS recorded data shall be reviewed and evaluated for evidentiary  
5 value by the Code Enforcement Manager or Supervisor. Data of  
6 identifiable individuals not intended to be used as evidence shall not be  
7 retained. All retained data shall be maintained or destroyed pursuant to  
8 County retention policies....

9 All UAS flights must be pre-approved by the Code Enforcement Manager  
10 or Supervisor and will be reviewed by the Code Enforcement Manager or  
11 Supervisor to ensure that they are conducted in accordance with Permit  
12 Sonoma policy, FAA regulations, state and federal law, and with due  
13 regard for public privacy.”

14  
15  
16 67. On information and belief, at all relevant times, the Code Enforcement Manager  
17 referred to in the County’s drone policy was, and is, Defendant Harrington and the  
18 Code Enforcement Supervisor is now Defendant Cablk.

19 68. Additionally, the Scope of Work states, in pertinent part:

20  
21 “Contractor shall only gather aerial data upon receipt of written  
22 authorization from either a Senior Code Enforcement Inspector, the Code  
23 Enforcement Supervisor or the Code Enforcement Manager of Permit  
24 Sonoma....

25 Contractor shall accompany a written summary for each request that  
26 includes the name and contact information of the employee that collected  
27 the data ,the date the data was collected, clearly outlined parcel and  
28

1 address information as well as detailed GPS coordinates and any other  
2 information for the County to understand the data location and scope....  
3 Contractor shall comply with all laws, statutes, ordinances and regulations  
4 as they may be amended from time to time...”

- 5
- 6 69. Whether by the drone policy or private contract, the County does not have the  
7 authority to promulgate policies and procedures authorizing nonconsensual  
8 inspections of private property absent an administrative warrant. (Marshall v.  
9 Barlow’s, Inc., 436 U.S. 307, 324 (1978) [striking down OSHA’s warrantless  
10 inspection scheme finding it “unconstitutional insofar as it purports to authorize  
11 inspections without warrant.”].)
- 12
- 13 70. As alleged in greater detail herein, neither the drone policy nor the Scope of Work  
14 represent adequate substitutes for the constitutional safeguards afforded by the  
15 Fourth Amendment to protect the civil rights of property owners in the County,  
16 including Meyer. Taken together, these documents – which represent official County  
17 policy applied and put into official action - delegate the manner, method and  
18 operation of the use of drones to search private property to the unfettered discretion  
19 of those County officials engaged in the warrantless search. (See De La Cruz v.  
20 Quackenbush, 80 Cal.App.4th 775, 789-790 (2000) [“the regulatory scheme at issue  
21 does not provide an adequate substitute for a warrant because it has neither a  
22 ‘properly defined scope’ nor a ‘limit on the discretion of the officers.’”])
- 23
- 24
- 25 71. What is most noticeable, however, is not so much what is stated in these documents;  
26 rather, it is what is not stated. Nowhere in either the County’s drone policy or the  
27 Scope of Work is the word “warrant” even mentioned, much less are there any  
28 directives (or even encouragements) for Permit Sonoma officials to obtain a warrant



1 before using drones to conduct nonconsensual, non-exigent searches of private  
2 property.

3 72. In short, these documents, at best, impose only the vaguest limitations on the  
4 discretion of County officials when conducting drone searches of private property  
5 resulting in the proverbial “fox guarding the hen house.” The net result is the  
6 violation of the constitutional rights of Meyer and other property owners within the  
7 County’s jurisdiction.  
8

9 **(E) Plaintiff Inherits the Subject Property**

10 73. On October 18th 2018, Meyer inherited a four acre parcel of property at 639 Duer  
11 Road, Sebastopol, California, otherwise referred to herein as the subject property.  
12

13 **(F) The County Expands CEEP to Non-Cannabis Related Properties  
14 Including Plaintiff and the Subject Property**

15 74. CEEP was never limited solely to cannabis related code violations or grow  
16 operations. In 2019, the reach of this unconstitutional policy went into full swing  
17 against both cannabis and non-cannabis property owners. On information and  
18 belief, Meyer was one of the first, if not the first, non-cannabis properties that was  
19 subjected to the reach of CEEP. To date, County officials – including the Office of  
20 County Counsel – has referred to Meyer’s case as their “unprecedented case.”  
21

22 75. On 1/02/2019, Meyer and her contractor, Anthony Judge, went to Permit Sonoma to  
23 get a grading permit for a small horse arena Meyer wanted to build on the southwest  
24 side of the subject property. She was told she did not need a grading permit for an  
25 arena of that type and size. She was told that because she was not actually erecting  
26 any walls for a building, she did not need a grading permit.  
27

28 76. On or around 1/20/2019 Meyer began building the arena. A neighbor filed a  
complaint with CED questioning if she had the right permits for the arena. On

1 2/11/2019, Meyer received a violation, VGR19-0018, unpermitted grading in a flood  
2 prone urban area.

3 77. On or around 2/11/2019, Meyer and Judge again went to talk to officials at Permit  
4 Sonoma, bringing with them plans for the arena. Meyer made an appointment for an  
5 inspection of the arena.  
6

7 78. On or around 2/11/2019, an officer with CED who on information and belief was  
8 Ryan Petirelli, no longer employed with the County, came to the subject property  
9 and inspected the arena, signing off on it without a grading permit and giving us  
10 permission to finish the project.  
11

12 79. On 6/26/2019, some four months later and for reasons unknown, Hoffman entered  
13 upon the subject property in the afternoon. At that time, Hoffman, a former  
14 narcotics cop, had a shaved head and many visible tattoos. Meyer saw him from a  
15 window of her residence. When she approached him, Hoffman was rude and could  
16 produce no identification backing up the claim he was from the County. Meyer told  
17 Hoffman to “get the fuck off my property,” at which time Hoffman in a punitive and  
18 retaliatory manner told Meyer she had done it now “and he could give me 10  
19 violations.”  
20

21 80. In fact, Hoffman did proceed to issue the following violations to Meyer:

- 22 • VBU-19-0382 (deck to access second story);
- 23 • VPL-19-05255 (fence exceeding 3’ in front yard);
- 24 • VPL-19-0526 (occupied travel trailer);
- 25 • VPL-19-0527 (occupied travel trailer); and
- 26 • VGR-19-0034 - 6-26-2019 (grading violation in excess of 50 cubic yards)

27 81. This last violation re-opened the grading violation that Petirelli had previously  
28 closed.

1 82. Thereafter, Deputy County Counsel Holly Rickett informed Meyer that she  
2 would close the grading violation on the arena herself if Meyer could produce  
3 receipts showing how much material she had used. Although Meyer produced  
4 receipts, and eventually obtained a grading permit, neither Rickett nor anyone  
5 else closed the violation.  
6

7 83. Hoffman was not done. On or around 7/18/2019, he returned to the subject  
8 property without an invite, appointment, or notice. Access by vehicle to the  
9 subject property is barred by a security gate which opens with a code. Hoffman  
10 was at the gate demanding to see my septic. Meyer refused because she was  
11 leaving for an appointment. She told Hoffman there was nothing wrong with the  
12 septic system. In retaliation, Hoffman issued Meyer yet another violation –  
13 VWS-19-0028 (“self proclaimed septic and leach field failure”).  
14

15 84. Subsequently, Hoffman wrote an ambiguous letter to Meyer stating that her  
16 septic needed to be tested, but he did not specify that it must be by an engineer.  
17 On 7-29-2019, Meyer hired Joe Farmers Septic to test the septic system which  
18 passed, at a cost to Meyer of \$1,200.00.  
19

20 85. Both Hoffman and Rickett found old paperwork from the 1970’s stating that the  
21 septic system did not perk and would need to be tested every year. Based on  
22 their utter lack of any knowledge about septic systems, or building systems in  
23 general, they both failed to recognize that in 1980’s the septic system at the  
24 subject property had been permitted when the residence was legally built on the  
25 subject property.  
26

27 86. Rickett emailed Meyer stating that if she got a Tier 1 report done on the septic  
28 system by an engineer, she would close the violation with no penalties. On



1 February 1, 2022, Meyer retained Mike Treinen, a septic engineer and ex county  
2 employee, who performed both a Tier 1 and Tier 2 test. Meyer’s septic system  
3 passed with issues. Nevertheless, no official with the County ever closed the  
4 violation as Rickett had promised, and in fact, the County pursued a \$50,000  
5 claim against Meyer for the septic violation to a judgment in court, and  
6 continues to seek collection of this and other sums from Meyer to the present  
7 day.  
8

9 87. This is but one example of many that occurred over the following twenty-four  
10 months where Meyer, working with an attorney, tried to negotiate a resolution  
11 with the County only to find herself on the receiving end of yet more violations  
12 or re-violations, which the County refused to close.  
13

14 88. Eventually, Meyer’s attorney, Elizabeth Reifler, was able to negotiate a deal with  
15 Rickett to resolve all the violations the County had issued against her for the  
16 sum of \$17,000. The deal was reached on March 13, 2020.  
17

18 89. In or about the same time, the County flew a drone for the first time over  
19 Plaintiff’s property without a warrant, without consent, and without any exigent  
20 circumstances.  
21

22 90. Immediately after the deal was reached, County Counsel’s Office completely shut  
23 down due to the COVID-19 pandemic. Meyer – who had obtained a hard money  
24 loan to pay the County under the agreement – was unable to pay the agreed-  
25 upon sum. By the time County Counsel’s Office reopened, a new Deputy County  
26 Counsel, Sharmalee Rajukumaran, had been assigned to Meyer’s case.  
27 Rajukumaran refused to abide by the agreement previously reached with  
28 Meyer’s attorney whom they knew had died in the meantime.

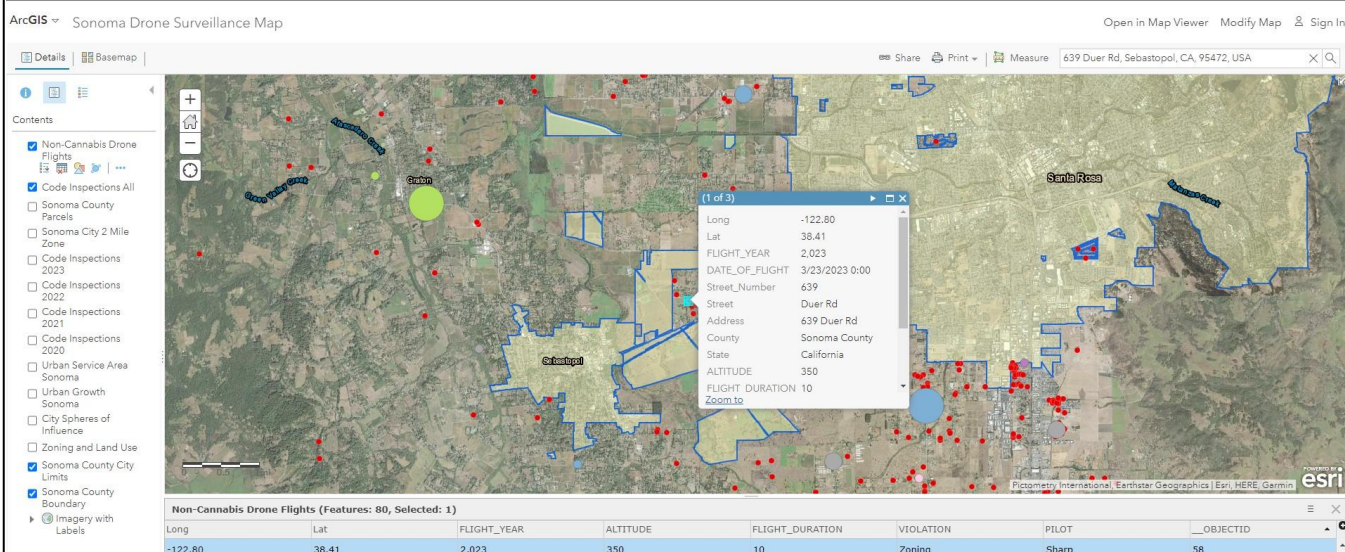




91. Ultimately, the County pursued Meyer in civil court and obtained a judgment against her for the aforementioned violations and others which are not set forth herein but can and will be upon amendment and subject to further disclosure and discovery.

**(G) The County Has Continued to Use Drones to Surveil Plaintiff and the Subject Property & Has Used Animal Control to Intrude Upon the Subject Property Without a Warrant**

92. Since that time, the County has continued to surveil the subject property with drones, each time without a warrant, consent, or exigent circumstances. The most recent such surveillance occurred on March 23, 2023 according to records obtained from the County as a result of a Public Records Act Request which are depicted in the ARCGis image below:



93. In addition, on or about February 14, 2024, Defendant Martinez, acting in his official capacity as an Animal Services Officer for the County surreptitiously entered upon the subject property when Meyer activated her security gate to let a guest drive onto the property. Martinez quickly followed Meyer’s guest so that his County vehicle was able to enter through the gate before the gate closed. On



1 information and belief, Martinez was “casing” the subject property as it would be  
2 quite a coincidence that he should arrive at the subject property just in the nick  
3 of time to follow a guest onto the subject property. On further information and  
4 belief, Martinez was at the subject property at the behest of one or more  
5 individuals employed in CED.  
6

7 94. Once upon the subject property, Martinez drove nearly 130 feet onto the  
8 property. When Meyer approached and told him to get off the property,  
9 Martinez refused to leave to property and, instead, badgered and harassed  
10 Meyer who captured the encounter on video.  
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**VI.**

**COUNT ONE**

**(42 U.S.C. § 1983 – VIOLATION OF 4TH and 14TH AMENDMENTS)**

**(Against all Defendants)**

95. Meyer realleges each and every allegation contained in this Complaint and incorporates them as if set forth in full in Count One of this Complaint.

96. The Fourth Amendment to the U.S. Constitution provides:

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

105. By doing the acts complained of herein, Defendants, and each of them, and acting under color of law, county ordinances, regulations, official policies or procedures, or customs and practices, in violation of 42 U.S.C. § 1983, have deprived Meyer, and continue to deprive Meyer, of the right against unreasonable searches of the subject property as guaranteed by the Fourth Amendment.

106. Defendants violated Meyer’s right to be free from unreasonable searches under the Fourth Amendment by, among other things, surveiling the subject property using a drone on or about March 23, 2023, without an inspection warrant, and without Meyer’s consent and without exigent circumstances; and entering upon the subject property on February 14, 2024, again without a warrant, and without Meyer’s consent and without exigent circumstances, to harass Meyer and violate her rights;



1 107. At the time Defendants undertook the above-referenced conduct, their acts and  
2 omissions as alleged herein are indicative and representative of unconstitutional policies  
3 promulgated by the County and/or a repeated course of conduct by Defendants, and each of  
4 them, in unconstitutionally enforcing the County’s policies, which is tantamount to a custom,  
5 practice or procedure of the County and its agency, Permit Sonoma, of condoning and  
6 encouraging the disregard of the constitutional rights of the residents of the County, as alleged  
7 herein.  
8

9 108. As a direct and proximate result of Defendants’ illegal conduct, Meyer has suffered  
10 actual injuries and damages to his person, including general damages, as well as financial and  
11 pecuniary damages to the subject property in an amount according to proof at trial.  
12

13 WHEREFORE, Meyer prays for Judgment as set forth below.

14 **COUNT TWO**  
15 **(VIOLATION OF 42 U.S.C. § 1983 – VIOLATION OF 8th AND 14th**  
16 **AMENDMENTS)**  
17 **(Against All Defendants)**  
18

19 109. Meyer realleges each and every allegation contained in this Complaint and  
20 incorporates them as if set forth in full in Count Two of this Complaint.

21 110. The Eighth Amendment to the U.S. Constitution provides, in part:

22 *“Excessive bail shall not be required, nor excessive fines imposed, nor cruel and*  
23 *unusual punishments inflicted..”*  
24

25 110. In doing the acts complained of herein, Defendants, and each of them, did impose,  
26 and continue to impose, excessive fines and penalties against Meyer in violation of the Eighth  
27 Amendment, which is a violation of 42 U.S.C. Section 1983, and is made applicable to the  
28



1 states through the Fourteenth Amendment as held in *Timbs*; and is further made applicable to  
2 municipal fines as held in *Pimentel*, as alleged in more detail herein.

3 111. At the time Defendants undertook the above-referenced conduct, their acts and  
4 omissions as alleged herein are indicative and representative of unconstitutional policies  
5 promulgated by the County and/or a repeated course of conduct by Defendants, and each of  
6 them, in unconstitutionally enforcing the County's policies, which is tantamount to a custom,  
7 practice or procedure of the County and its agency, Permit Sonoma, of condoning and  
8 encouraging the disregard of the constitutional rights of the residents of the County, as alleged  
9 herein.  
10

11 112. These actions, and the others by Defendants were undertaken arbitrarily,  
12 capriciously, punitively, and in furtherance of illegal conduct that violated Meyer's  
13 constitutional rights and has directly and proximately caused Meyer to sustain actual injuries  
14 and damages to his person as well as his financial and pecuniary interest in the subject  
15 property, which has had its value substantially reduced as a result of Defendants' actions, in  
16 an amount according to proof at trial.  
17

18 WHEREFORE, Meyer prays for Judgment as set forth below.  
19

20 **COUNT THREE**

21 ***MONELL LIABILITY***

22 **(Against Defendant COUNTY OF SONOMA)**

23 113. Meyer realleges each and every allegation contained in this Complaint and  
24 incorporates them as if set forth in full in Count Three of this Complaint.  
25

26 114. The County in its official capacity, and under color of law, knowingly, or  
27 negligently, or with deliberate indifference to the rights allegedly violated, caused to come into  
28 being, maintained, fostered, condoned, approve of, either before the fact or after, ratified, took

1 no action to correct, an official policy, practice, procedure, or custom of permitting the  
2 occurrence of the wrongs set forth in this pleading, and/or improperly, inadequately, with  
3 deliberate indifference to the federal constitutional or statutory rights of persons, with  
4 negligent or reckless disregard for those rights, failed to properly train, supervise, retrain,  
5 monitor, or take corrective action with respect to the Director, Code Enforcement Manager,  
6 Senior Code Enforcement Officers, and other inspection officers working with CED and with  
7 respect to the types of wrongful conduct alleged in this pleading, so that the County is legally  
8 responsible for all injuries and/or damages sustained by Meyer pursuant to the holding of  
9 *Monell v. New York City Dept. of Social Sev'cs*, 436 U.S. 658 (1987) and its progeny.  
10

11  
12 115. At all times alleged herein, the County had a duty to adequately train, supervise  
13 and discipline CED officers in order to protect members of the public, including Meyer, from  
14 being harmed by the actions of said officers. The County was deliberately indifferent to such  
15 duties, enacting policies that encouraged and promoted unconstitutional behavior by CED  
16 officers, and thereby proximately caused the harm to Meyer alleged herein.  
17

18 116. The County's implementation of an unconstitutional policy, or its failure to  
19 implement proper code enforcement inspection, citation, and collections procedures and  
20 practices proximately caused the harm to Meyer alleged herein. The County's actions or  
21 failures to act resulted in willful ignorance of Meyer's constitutional rights, willful disregard  
22 for those rights, and malicious and reckless misconduct by Hoffman and Cablk as well as by  
23 other County officials involved with imposing and collecting excessive fines from Meyer as  
24 alleged herein.  
25

26 117. The County's unlawful CEEP policy and Drone Use Policy, in lieu of proper,  
27 constitutional code enforcement policies, promote, condone, authorize and approve of CED's  
28 practices, procedures, and customs that have harmed and damaged, and continue to harm and

1 damage, hundreds, if not thousands of landowners in the County, including Meyer. The  
2 County's code enforcement policies, customs, and practices were, and are, malicious, reckless,  
3 or at least grossly negligent, and have resulted and continue to result in a deprivation of  
4 Meyer's federal constitutional rights as enumerated herein.  
5

6 118. As detailed herein, the County had a duty to properly supervise CED and its  
7 activities to ensure that such code enforcement actions were in the public's interest and did  
8 not harm Meyer's constitutional rights, property rights, or financial interests. In this regard,  
9 the County intentionally, maliciously, and negligently failed in its duty, and even now,  
10 threaten to dispossess Meyer of the subject property through abuse of judicial process.  
11

12 119. The County's code enforcement policies and practices are malicious, reckless, and  
13 or grossly negligent in that they permit County officials and their agents to conduct  
14 warrantless searches by means of drones and under other circumstances; execute and obtain  
15 overly broad, defective inspection warrants; levy excessive and exaggerated fines and penalties  
16 of hundreds of thousands of dollars for trumped up violations that do not threaten to harm  
17 anyone or the public at large. The County condoned, approved, ratified and maintained  
18 procedures and practices of using CED in an overly aggressive, harassing, retaliatory manner  
19 against landowners, including Meyer, and in doing so blatantly violated Meyer's constitutional  
20 rights.  
21

22 120. Meyer is informed and believes, and based thereon alleges, that in doing the acts  
23 alleged herein, or failing to take action, the County knew, or in the exercise of reasonable  
24 diligence should have known, that Hoffman and Cablk were incompetent and unfit to perform  
25 the duties for which the County employed or promoted them to perform, and that an undue  
26 risk to persons such as Meyer would exist because of their employment.  
27  
28



1 121. Further, the County, by and through those employees and agents who trained  
2 and/or supervised Hoffman and Cablk, failed to exercise reasonable care when training  
3 and/or supervising them.

4 122. Plaintiff is informed and believes and thereupon alleges that the County had  
5 advance knowledge of Hoffman’s propensity to violate the constitutional rights of others or  
6 otherwise engage in misconduct in his individual and official capacity, as he has a history of  
7 such acts, and the County knew or, in the exercise of reasonable diligence, should have known  
8 of such history, which made Hoffman unsuitable for employment by the County, and certainly  
9 unsuitable for a senior inspector role at CED.  
10

11 123. Despite this advance knowledge, the County hired and retained Hoffman as  
12 employees in conscious disregard of the rights and safety of others, and of Meyer.  
13

14 124. As a proximate and direct legal result of the County’s negligence as alleged herein,  
15 Meyer has suffered the harm alleged herein, in an amount to be determined at trial, but in  
16 excess of the minimum jurisdictional limits of this court.  
17

18 **COUNT FOUR**

19 **VIOLATION OF CALIFORNIA CONST., ART. I, § 1 – RIGHT OF PRIVACY**  
20 **(Against All Defendants)**

21 125. Meyer realleges each and every allegation contained in this Complaint and  
22 incorporates them as if set forth in full in Count Four of this Complaint.  
23

24 126. Article I, Section 1 of the California Constitution provides:

25 *“All people are by nature free and independent and have inalienable rights.*  
26 *Among these are enjoying and defending life and liberty, acquiring, possessing,*  
27 *and protecting property, and pursuing and obtaining safety, happiness, and*  
28 *privacy.”*





1 127. By doing the acts complained of herein, Defendants, and each of them, and acting  
2 under color of law, county ordinances, regulations, official policies or procedures, or customs  
3 and practices have deprived Meyer, and continue to deprive Meyer, of her rights under the  
4 California Constitution, causing actual harm.

5  
6 128. These actions, and the others by the individual Defendants were done  
7 intentionally, knowingly, maliciously and with an evil or improper motive amounting to  
8 malice; or with a knowing and conscious disregard for Meyer's rights; in a manner and  
9 according to methods that no civilized society should be required to tolerate. As such, the  
10 individual Defendants may, and should be, held liable for punitive or exemplary damages in  
11 order to deter such conduct in the future. undertaken arbitrarily, capriciously, punitively, and  
12 in furtherance of illegal conduct that violated Meyer's constitutional rights and has

13  
14 129. Under California Government Code section 820(a), the individual Defendants are  
15 liable for damages for their own misconduct.

16  
17 130. Under California Government Code section 815.2(a), the County is vicariously  
18 liable for the conduct of the individual Defendants that was performed within the course and  
19 scope of their employment, though not for any award of punitive damages and no such award  
20 is sought against the County; however, the County may be required to indemnify the  
21 individual Defendants for some or all of the damages alleged herein.

22 WHEREFORE, Meyer prays for Judgment as set forth below.

23  
24 **COUNT FIVE**

25 **TRESPASS**

26 **(Against All Defendants)**

27 131. Meyer realleges each and every allegation contained in this Complaint and  
28 incorporates them as if set forth in full in Count Five of this Complaint.

1 132. At all times alleged herein, Meyer legally possessed the subject property and had a  
2 reasonable expectation of privacy over the subject property.

3 133. At all times alleged herein, Defendants' entry onto the subject property was not  
4 authorized by a warrant, or a properly issued warrant, was without Meyer's consent, and  
5 without any privilege on the part of Defendants to enter upon the subject property.  
6

7 134. As a direct and proximate result, Meyer has sustained actual injuries and damages  
8 to his person as well as his financial and pecuniary interest in the subject property, which has  
9 had its value substantially reduced as a result of Defendants' actions, in an amount according  
10 to proof at trial.

11 135. These actions, and the others by the individual Defendants were done  
12 intentionally, knowingly, maliciously and with an evil or improper motive amounting to  
13 malice; or with a knowing and conscious disregard for Meyer's rights; in a manner and  
14 according to methods that no civilized society should be required to tolerate. As such, the  
15 individual Defendants may, and should be, held liable for punitive or exemplary damages in  
16 order to deter such conduct in the future. undertaken arbitrarily, capriciously, punitively, and  
17 in furtherance of illegal conduct that violated Meyer's constitutional rights and has  
18  
19

20 136. Under California Government Code section 820(a), the individual Defendants are  
21 liable for damages for their own misconduct.

22 137. Under California Government Code section 815.2(a), the County is vicariously  
23 liable for the conduct of the individual Defendants that was performed within the course and  
24 scope of their employment, though not for any award of punitive damages and no such award  
25 is sought against the County; however, the County may be required to indemnify the  
26 individual Defendants for some or all of the damages alleged herein.  
27

28 WHEREFORE, Meyer prays for Judgment as set forth below.

**COUNT SIX**

**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

**(Against All Defendants)**

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138. Meyer realleges each and every allegation contained in this Complaint and incorporates them as if set forth in full in Count Six of this Complaint.

139. At all times alleged herein, Defendants, and each of them, acted intentionally or recklessly, in a manner that was extreme and outrageous, and Defendants' conduct has caused Meyer to suffer severe emotional distress to her harm and detriment.

140. As a direct and proximate result, Meyer has sustained actual injuries and damages to his person as well as his financial and pecuniary interest in the subject property, which has had its value substantially reduced as a result of Defendants' actions, in an amount according to proof at trial.

141. These actions, and the others by the individual Defendants were done intentionally, knowingly, maliciously and with an evil or improper motive amounting to malice; or with a knowing and conscious disregard for Meyer's rights; in a manner and according to methods that no civilized society should be required to tolerate. As such, the individual Defendants may, and should be, held liable for punitive or exemplary damages in order to deter such conduct in the future. undertaken arbitrarily, capriciously, punitively, and in furtherance of illegal conduct that violated Meyer's constitutional rights and has

142. Under California Government Code section 820(a), the individual Defendants are liable for damages for their own misconduct.

143. Under California Government Code section 815.2(a), the County is vicariously liable for the conduct of the individual Defendants that was performed within the course and scope of their employment, though not for any award of punitive damages and no such award



1 is sought against the County; however, the County may be required to indemnify the  
2 individual Defendants for some or all of the damages alleged herein.

3 WHEREFORE, Meyer prays for Judgment as set forth below.

4 **VII.**

5 **RELIEF SOUGHT**

6  
7 WHEREFORE, Plaintiff KENI MAE MEYER, seeks the following relief on behalf of  
8 himself and others similarly situated:

9 1. A declaration that the actions of Defendants', and each of them, were and are  
10 unlawful and unconstitutional;

11 2. A temporary restraining order and preliminary and permanent injunction enjoining  
12 Defendants, and each of them, their agents and employees, from entering the private property  
13 of the residents of the County of Sonoma without first securing a warrant; unless Defendants,  
14 and each of them, their agents and employees have the consent of the person in lawful  
15 possession of the property, unless the property presents exigent circumstances, unless the  
16 property is "open field, or unless the search is conducted from a public vantage point;

17 3. A temporary restraining order and preliminary and permanent injunction enjoining  
18 Defendants, and each of them, their agents and employees, from using drones to conduct  
19 inspections or searches of the private property of the residents of the County of Sonoma  
20 without a warrant; unless Defendants, and each of them, their agents and employees have the  
21 consent of the person in lawful possession of the property, unless the property presents  
22 exigent circumstances, or unless the property is "open field;

23 4. A temporary restraining order and preliminary and permanent injunction enjoining  
24 Defendants, and each of them, their agents and employees, from using drones to conduct  
25



1 inspections or searches of the private property at a height greater than 400 feet above the  
2 ground;

3 5. For damages and punitive damages, according to proof at trial;

4 6. For costs and attorney's fees incurred in this action; and

5 7. For such other and further relief as this Court deems is just and proper.

6  
7 Respectfully submitted,

8 Dated: December 13, 2024

**YOUNG LAW GROUP**

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11 By: /s/Eric G. Young, Esq.  
12 ERIC G. YOUNG, ESQ., Attorneys for  
13 Plaintiff KENI MAE MEYER  
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VIII.

**DEMAND FOR JURY TRIAL**

Plaintiff KENI MAE MEYER hereby demands a trial by jury on all counts and upon all relief sought herein that is so triable.

Dated: December 13, 2024

**YOUNG LAW GROUP**

By: /s/Eric G. Young, Esq.  
ERIC G. YOUNG, ESQ., Attorneys for  
Plaintiff KENI MAE MEYERR

