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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

NYREE DAQUAN HINTON, an individual,

Plaintiff,

v.

COUNTY OF SANTA BARBARA, a public entity; SANTA BARBARA COUNTY SHERIFF'S OFFICE, a public agency; BILL BROWN, Sheriff-Coroner, in his official and supervisory capacities; JOSHUA COCKRELL (Badge #4167), Sergeant, in his individual capacity; MARIO RIVERA (Badge #5341), Deputy Sheriff, in his individual capacity; MITCHEL WOOLLEY (Badge #6101), Deputy Sheriff, in his individual capacity; BAYLEY WEBER (Badge #6100), Deputy Sheriff, in his individual capacity; A. SHIN (Badge #6189), Deputy Sheriff, in his individual capacity; THE GOLDEN 1 CREDIT UNION, a California corporation; STEVEN GUEVARA, an individual;

Case No. 2:26-cv-_____

COMPLAINT FOR DAMAGES, DECLARATORY RELIEF, AND INJUNCTIVE RELIEF:

(1) 42 U.S.C. § 1983 — Unlawful Stop and Detention (Fourth Amendment);
(2) 42 U.S.C. § 1983 — False Arrest and False Imprisonment (Fourth Amendment);
(3) 42 U.S.C. § 1983 — Unreasonable Search and Seizure of Vehicle and Legal Mail (First and Fourth Amendments);
(4) 42 U.S.C. § 1983 — Fabrication of Official Custodial Records (Fourteenth Amendment);
(5) 42 U.S.C. § 1983 — Procedural Due Process, Vehicle Code § 22852 (Fourteenth Amendment);
(6) 42 U.S.C. § 1983 — Supervisory and Monell Liability;
(7) Tom Bane Civil Rights Act, Cal. Civ. Code § 52.1;
(8) Truth in Lending Act, 15 U.S.C. § 1601 et seq.;

805 ROADSIDE TOWING, a business entity; FIVE STAR REGISTRATION, a business entity; PARAMOUNT RECOVERY SERVICE, a business entity; ELVEN-DAVID ROBERT BRAUN, an individual; and DOES 1 through 25, inclusive, Defendants.	(9) Rees-Levering Act, Cal. Civ. Code §§ 2983.2, 2983.3; (10) Wrongful Repossession and Conversion; (11) Collateral Recovery Act, Cal. Bus. & Prof. Code §§ 7507.9–7507.10; (12) Cal. Civ. Code §§ 3068–3074; (13) Rosenthal Fair Debt Collection Practices Act, Cal. Civ. Code § 1788 et seq.; (14) Unfair Competition, Cal. Bus. & Prof. Code § 17200; DEMAND FOR JURY TRIAL

Plaintiff NYREE DAQUAN HINTON, proceeding pro se, alleges upon personal knowledge as to his own acts and upon information and belief formed after reasonable inquiry as to all other matters. This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343(a)(3)–(4) and 15 U.S.C. § 1640(e). Plaintiff alleges as follows:

I. INTRODUCTION AND NATURE OF THE ACTION

1. This civil rights and consumer-protection action arises from a documented chain of unconstitutional policing, custodial record falsification, and unlawful collateral conversion that began on April 30, 2026, at the border of the University of California, Santa Barbara ("UCSB") in Goleta, California, and culminated in the unlawful seizure, multi-county concealment, and forced liquidation of Plaintiff's 2020 Jaguar F-TYPE (VIN: SAJDD1GX4LCK67497).

2. On the evening of April 30, 2026, while visiting UCSB following his admission to a graduate program, Plaintiff voluntarily brought his 2020 Jaguar F-TYPE to a complete stop at El Colegio Road and Camino Pescadero before any law enforcement emergency lights were activated. Despite Plaintiff's complete

cooperation, Santa Barbara County Sheriff's Office ("SBSO") Deputies Mitchel Woolley (#6101), Mario Rivera (#5341), and Bayley Weber (#6100) placed Plaintiff in handcuffs within three minutes of running his license plate (19:34:02), searched his vehicle without a warrant, seized a USPS Priority Mail box containing Plaintiff's privileged legal files and civil rights complaints, and arrested him on fabricated charges of obstructing an officer (Cal. Pen. Code § 148(a)(1)), unlicensed driving (Cal. Veh. Code § 12500(a)), and possessing a controlled substance without a prescription (Cal. Bus. & Prof. Code § 4060).

3. Each arrest charge was directly refuted by objective evidence in the deputies' immediate possession: (a) SBSO's own Computer-Aided Dispatch ("CAD") log at 20:02:46 returned Plaintiff's Pennsylvania driver's license as "Valid" with "SuspensionCategory 0 – NO," establishing a complete statutory exemption under Vehicle Code § 12502(a)(1); (b) the medication seized was in a clearly labeled prescription bottle bearing Plaintiff's and his physician's names; and (c) the Santa Barbara County District Attorney subsequently declined to file the Penal Code § 148(a)(1) obstruction charge altogether in Case No. 26CR03411.

4. To conceal the unlawful overnight incarceration of a cooperative citizen, Booking Deputy A. Shin (#6189) and Sergeant Joshua Cockrell (#4167) falsified official custody records (Booking #1193941) to certify that Plaintiff was "Cite Released" on April 30, 2026, at 22:15, when internal jail financial records (Transaction #49925) prove Plaintiff was held in custody until 02:46 on May 1, 2026. Simultaneously, Deputies Rivera, Weber, and Sgt. Cockrell ordered Plaintiff's vehicle impounded by Defendant 805 Roadside Towing (Invoice #68306) in violation of the Fourth Amendment community caretaking doctrine and SBSO Policy Manual § 510.2, while explicitly checking "NO" on the CHP 180 form as to whether mandatory post-storage hearing notices under Vehicle Code § 22852 were sent to the registered and legal owners.

5. What followed was a coordinated, extra-legal disposition scheme between SBSO, 805 Roadside Towing, Five Star Registration, The Golden 1 Credit Union ("Golden 1"), and Paramount Recovery Service. First, on May 11, 2026, 805 Roadside and Five Star Registration initiated a fraudulent Civil Code § 3072 lien sale by valuing the 2020 Jaguar F-TYPE at "$4,000 or less." Second, to bypass the 30-day impound rules and defeat Plaintiff's timely June 5, 2026 DMV Declaration of Opposition, Golden 1 Specialist Steven Guevara executed a backdated DMV Certificate of Repossession (REG 119) claiming repossession on May 15, 2026, and on May 21–26, 2026, secured an "Early Release Agreement" from SBSO under Vehicle Code § 14602.6(f) by submitting a completely unrelated retail installment contract belonging to another consumer (Emogene McGhee, for a 2015 Audi Q7, VIN WA1LGAFE8FD027525).

6. Between May 26 and June 5, 2026, Golden 1 and Paramount Recovery secretly moved Plaintiff's vehicle across three counties—from Goleta to Ventura County, and then on June 5, 2026, to Adesa Los Angeles Auto Auction in Mira Loma (Riverside County)—without serving the 48-hour Notice of Seizure required by Business and Professions Code § 7507.10 or the Notice of Intent to Dispose required by Civil Code § 2983.2. Because Golden 1 withheld all legal notice of repossession until June 11, 2026, Plaintiff's good-faith effort to retrieve his personal property at the Mira Loma lot on June 6, 2026, resulted in his false arrest in Riverside County. Five days later, on June 11, 2026, Golden 1 mailed a defective Notice of Plan to Sell that falsely accused Plaintiff of "criminal acts of violence" to strip him of his statutory right of reinstatement under Civil Code § 2983.3(b)(4), sold the vehicle on July 10, 2026, demanded an unlawful $6,067.84 deficiency on August 13, 2026, and terminated Plaintiff's credit union membership on August 14, 2026.

II. JURISDICTION AND VENUE

7. This Court has original federal question jurisdiction over Plaintiff's federal claims pursuant to 28 U.S.C. §§ 1331 and 1343(a)(3)–(4) because this action is brought under 42 U.S.C. §§ 1983 and 1988 to redress the deprivation, under color of state law, of rights, privileges, and immunities secured by the First, Fourth, and Fourteenth Amendments to the United States Constitution, and under the Truth in Lending Act ("TILA"), 15 U.S.C. § 1640(e).

8. This Court has supplemental jurisdiction over Plaintiff's state-law claims against all public and private Defendants pursuant to 28 U.S.C. § 1367(a) because those claims—arising from the April 30, 2026 seizure of Plaintiff's 2020 Jaguar F-TYPE, the May 21–26, 2026 Vehicle Code § 14602.6 early release agreement between SBSO and Golden 1, the multi-county relocation of the vehicle without statutory notice, and the July 10, 2026 disposition—are so related to the federal claims that they form part of the same case or controversy under Article III of the United States Constitution.

9. This Court has authority to grant declaratory and injunctive relief pursuant to 28 U.S.C. §§ 2201 and 2202 and Federal Rules of Civil Procedure 57 and 65.

10. Venue is proper in the Central District of California (Western Division) pursuant to 28 U.S.C. § 1391(b)(1) and (b)(2) because a substantial part of the events, omissions, and property seizures giving rise to Plaintiff's claims occurred in Santa Barbara County, Ventura County, and Riverside County, California, all of which lie within the Central District of California.

11. Administrative prerequisites (Cal. Gov. Code § 910 et seq.): Plaintiff timely served formal written notice of claims and pre-litigation demands upon the County of Santa Barbara and the Santa Barbara County Sheriff's Office on June 7, 2026, June 13, 2026, and within the six-month statutory period prescribed by California Government Code § 911.2.

III. PARTIES

A. Plaintiff

12. Plaintiff NYREE DAQUAN HINTON is, and at all relevant times was, a thirty-year-old Black male, a citizen of the United States, a financial data analyst and technology entrepreneur, the registered owner of the subject 2020 Jaguar F-TYPE (VIN: SAJDD1GX4LCK67497; California License Plate #9PCM313), and the holder of a valid Pennsylvania driver's license and a valid California identification card. Plaintiff maintains residences in Easton, Pennsylvania, and Los Angeles, California.

B. County and Law Enforcement Defendants

13. Defendant COUNTY OF SANTA BARBARA ("County") is a public entity and political subdivision of the State of California, duly organized and existing under the laws of the State of California. Defendant SANTA BARBARA COUNTY SHERIFF'S OFFICE ("SBSO") is a local law enforcement agency and operating department of the County. Pursuant to California Government Code § 815.2, the County is vicariously liable for the state-law torts and statutory violations committed by its employees within the course and scope of their employment, and is directly liable under 42 U.S.C. § 1983 for unconstitutional policies, customs, ratifications, and failures to train.

14. Defendant BILL BROWN is, and at all relevant times was, the elected Sheriff-Coroner of Santa Barbara County and the final policymaker for SBSO regarding patrol operations, arrest and booking integrity, vehicle impoundment under SBSO Policy Manual § 510, and internal affairs oversight. He is sued in his official and supervisory capacities.

15. Defendant JOSHUA COCKRELL (Badge #4167) is, and at all relevant times was, a sworn Sergeant employed by SBSO. Sgt. Cockrell was the supervising officer who approved the false arrest and crime reports (Case #260004258) on May 1, 2026, at 01:57:48 while Plaintiff remained unlawfully

incarcerated, and who approved the unlawful CHP 180 vehicle impoundment without Vehicle Code § 22852 notice. He is sued in his individual capacity.

16. Defendant MITCHEL WOOLLEY (Badge #6101, Unit F17) is, and at all relevant times was, a sworn Deputy Sheriff employed by SBSO assigned to the Isla Vista Foot Patrol ("IVFP") division. Deputy Woolley initiated the April 30, 2026 license plate check (19:31:39) and initial detention in handcuffs (19:34:02). He is sued in his individual capacity.

17. Defendant MARIO RIVERA (Badge #5341, Unit F14) is, and at all relevant times was, a sworn Deputy Sheriff employed by SBSO. Deputy Rivera acted as the primary arresting and reporting officer in Case #260004258 and authored the materially false incident narrative omitting the valid Pennsylvania license return. He is sued in his individual capacity.

18. Defendant BAYLEY WEBER (Badge #6100, Unit F16) is, and at all relevant times was, a sworn Deputy Sheriff employed by SBSO. Deputy Weber assisted in the detention, search, and arrest of Plaintiff, and executed the CHP 180 Vehicle Report authorizing the impoundment of Plaintiff's vehicle while checking "NO" as to mandatory Vehicle Code § 22852 notice. He is sued in his individual capacity.

19. Defendant A. SHIN (Badge #6189) is, and at all relevant times was, a sworn Deputy Sheriff and booking officer employed by SBSO. Deputy Shin signed Citation #AS363045 and entered the falsified "Cite Release" disposition on Booking Form #1193941 certifying that Plaintiff was released on April 30, 2026, at 22:15. He is sued in his individual capacity.

C. Towing and Lien-Agent Defendants

20. Defendant 805 ROADSIDE TOWING ("805 Roadside") is a business entity operating at 5939 Placencia Street, Goleta, California 93117. Acting as a contracted towing agent for SBSO under color of law, 805 Roadside seized and impounded Plaintiff's vehicle (Invoice #68306) and Plaintiff's USPS Priority Mail

box containing legal files, assessed unlawful storage fees of $125.00 per day, initiated a fraudulent Civil Code § 3072 lien sale, and released the vehicle to Paramount Recovery despite Plaintiff's timely opposition.

21. Defendant FIVE STAR REGISTRATION ("Five Star") is a licensed registration and lien-sale service (Registration No. R39701) operating at P.O. Box 3169, Canyon Country, California 91386. Acting as agent for 805 Roadside, Five Star prepared and mailed the May 11, 2026 Notice of Pending Lien Sale (Seq. #260511-002) fraudulently valuing Plaintiff's 2020 Jaguar F-TYPE at "$4,000 or less" under Civil Code § 3072.

D. Credit Union and Repossession Defendants

22. Defendant THE GOLDEN 1 CREDIT UNION ("Golden 1") is a California corporation and state-chartered credit union headquartered at 8945 Cal Center Drive, Sacramento, California 95826. Golden 1 was the legal owner and lienholder on Plaintiff's September 17, 2024 retail installment contract (account ending 3789) for the 2020 Jaguar F-TYPE.

23. Defendant STEVEN GUEVARA is, and at all relevant times was, an Asset Management Specialist employed by Golden 1. Defendant Guevara executed the backdated May 15, 2026 DMV Certificate of Repossession (REG 119) under penalty of perjury, issued the May 21, 2026 Hold Harmless letter, and executed the May 26, 2026 SBSO Legal Owner Early Release Agreement using an unrelated third party's contract (Emogene McGhee's 2015 Audi Q7).

24. Defendant PARAMOUNT RECOVERY SERVICE ("Paramount") is a licensed repossession agency (BSIS License No. 1827) and Defendant ELVEN-DAVID ROBERT BRAUN is a registered repossession agent (BSIS Registration No. RAE513764, residing in Redding/Oxnard, California). Acting as agents for Golden 1, Paramount and Braun took physical custody of Plaintiff's Jaguar from Goleta on May 26, 2026, under the defective SBSO Early Release Agreement and transported it across multiple counties without serving the mandatory 48-hour

Notice of Seizure or personal property inventory under Business and Professions Code §§ 7507.9 and 7507.10.

25. Plaintiff is ignorant of the true names and capacities of Defendants sued herein as DOES 1 through 25, inclusive, and therefore sues these Defendants by such fictitious names. Plaintiff will amend this Complaint to allege their true names and capacities when ascertained through discovery, including the native RMS/CAD audit trails and jail booking logs.

IV. GENERAL FACTUAL ALLEGATIONS

A. Plaintiff's Background, Protected Activity, and Vehicle

26. Plaintiff Nyree Daquan Hinton is a financial data product manager and equity research analyst who previously held institutional roles at Bloomberg Intelligence, Third Bridge, and Capital Group, and is the founder of AI analytics platforms including Sapientiae.io. Plaintiff is also the lead plaintiff in a federal consumer action in this District challenging algorithmic odometer practices, Hinton v. Tesla, Inc., Case No. 2:25-cv-02877.

27. On September 17, 2024, Plaintiff purchased a 2020 Jaguar F-TYPE (VIN: SAJDD1GX4LCK67497, California License Plate #9PCM313) through Volvo of Palo Alto, financed through Defendant Golden 1 under the account ending 3789. At all relevant times prior to the April 30, 2026 seizure, Plaintiff maintained active automobile insurance on the vehicle through State Farm (added February 10, 2026), had a pending registration renewal and Statement of Facts (REG 256, Case #48616756) on file with the California DMV, and had made consistent monthly payments—including payments exceeding the scheduled baseline—on his Golden 1 account.

28. Prior to April 30, 2026, Plaintiff had engaged in constitutionally protected First Amendment activity by filing formal administrative and POST decertification complaints regarding pretextual traffic stops in Los Angeles County. At the time of the April 30, 2026 encounter, Plaintiff carried in his vehicle

a USPS Priority Mail box containing his privileged legal papers, evidence logs, and draft civil rights complaints.

B. The April 30, 2026 Detention and Arrest

29. On April 30, 2026, Plaintiff was in Santa Barbara County touring the University of California, Santa Barbara ("UCSB") campus after being accepted into a UCSB graduate program.

30. At approximately 19:31 hours, Plaintiff was driving his 2020 Jaguar F-TYPE near the intersection of El Colegio Road and Camino Pescadero in Goleta / Isla Vista—a heavily policed university zone primarily regulated under Santa Barbara County Code §§ 36-6 and 6-70.01 for student social gatherings.

31. According to SBSO's own CAD Incident Detail Report (Incident #SBSO260042030), at 19:31:39—before any traffic stop was initiated—Defendant Deputy Woolley (Unit F17) ran an automated license plate query on Plaintiff's vehicle (Plate #9PCM313). At 19:31:42, the SVS and WPS databases returned: "NO HITS IN SVS / NO NEAR MISS IN SVS / NO VEHICLE HIT IN WPS," confirming the vehicle was not stolen, had no warrants or wants attached to it, and was registered to Plaintiff Nyree Hinton, with Golden 1 as legal owner.

32. Before Deputy Woolley activated any emergency overhead lights, siren, or lawful command to stop, Plaintiff had already voluntarily pulled his vehicle to the curb and brought it to a complete stop at El Colegio Road and Camino Pescadero.

33. Upon contact, Plaintiff was calm and cooperative, immediately identified himself, and presented his valid, unexpired Pennsylvania driver's license, issued January 28, 2026, and expiring March 6, 2030, as well as his valid California identification card.

34. Notwithstanding the absence of any criminal hit or reasonable suspicion of a crime, the CAD log reflects that at 19:34:02—just two minutes and twenty seconds after the initial plate query—Deputy Woolley logged: "F17 ONE

DETAINED IN CUFFS." Within minutes, Defendant Deputies Rivera (F14) and Weber (F16), along with a fourth unit (3566/Yu), arrived on scene. [The Pages folder ends here. Continue this allegation and the narrative that follows, including the search, the seizure of the legal papers, the arrest, the booking, the tow, the notice failure, the lien sale, the repossession, the Riverside arrest, and the sale.]

V. CAUSES OF ACTION

COUNT I

(42 U.S.C. § 1983 — Unlawful Stop and Detention)

(Fourth Amendment)

(Plaintiff v. [Defendants for this count])

35. Plaintiff incorporates by reference each allegation set forth above.

36. [State the Fourth Amendment stop and detention elements and the facts, already begun in paragraphs 2, 3, and 29 through 34, that show the absence of reasonable suspicion. Name each Defendant who personally participated.]

37. [Causation and damages.]

COUNT II

(42 U.S.C. § 1983 — False Arrest and False Imprisonment)

(Fourth Amendment)

(Plaintiff v. [Defendants for this count])

38. Plaintiff incorporates by reference each allegation set forth above.

39. [State the absence of probable cause for each charge — Penal Code § 148(a)(1), Vehicle Code § 12500(a), and Business and Professions Code § 4060 — and the facts showing each Defendant's personal participation in the arrest and the continued custody. Probable cause for any one offense defeats a false-arrest claim. Plead the facts that meet that problem.]

40. [Causation and damages. This count overlaps the pending criminal case, Case No. 26CR03411. The Pages folder does not contain a request to stay,

rather than dismiss, any claim that would imply the invalidity of a future conviction.]

COUNT III

(42 U.S.C. § 1983 — Search and Seizure of the Vehicle and Legal Mail)

(First and Fourth Amendments)

(Plaintiff v. [Defendants for this count])

41. Plaintiff incorporates by reference each allegation set forth above.

42. [State the warrantless search, the seizure of the USPS Priority Mail box of legal papers, and the impound, including which Defendant did each act and why no exception applied.]

43. [Causation and damages.]

COUNT IV

(42 U.S.C. § 1983 — Fabrication of Official Custodial Records)

(Fourteenth Amendment)

(Plaintiff v. [Defendants for this count])

44. Plaintiff incorporates by reference each allegation set forth above.

45. [State who made each false record, what the record said, what the jail financial record showed, when it was made, and how it was used. Plead those facts with particularity. Fed. R. Civ. P. 9(b).]

46. [Causation and damages.]

COUNT V

(42 U.S.C. § 1983 — Procedural Due Process)

(Fourteenth Amendment; Vehicle Code § 22852)

(Plaintiff v. [Defendants for this count])

47. Plaintiff incorporates by reference each allegation set forth above.

48. [State the property interest, the missing Vehicle Code § 22852 notice (the CHP 180 box checked "NO"), who was responsible, and the deprivation that followed without a hearing.]

49. [Causation and damages.]

COUNT VI

(42 U.S.C. § 1983 — Supervisory and Monell Liability)

(Plaintiff v. [County, Sheriff Brown in his official capacity, and any supervising Defendant])

50. Plaintiff incorporates by reference each allegation set forth above.

51. [State the policy, custom, ratification, or failure to train; identify the final policymaker; and state facts beyond this single incident. A single incident is generally not enough. Do not seek damages from Sheriff Brown in his official capacity.]

52. [Causation and damages as to the County. Prospective declaratory and injunctive relief only as to Sheriff Brown in his official capacity.]

COUNT VII

(Tom Bane Civil Rights Act — Cal. Civ. Code § 52.1)

(Plaintiff v. [Defendants for this count])

53. Plaintiff incorporates by reference each allegation set forth above.

54. [Do not file this count until the Government Code claim is rejected or deemed rejected. Cal. Gov. Code § 945.6. The pages allege that notice was served. They do not allege rejection. State the threat, intimidation, or coercion, and the constitutional or statutory right interfered with. Do not plead treble damages. Section 52(b) treble damages do not apply to section 52.1.]

55. [Causation and damages. A pro se plaintiff does not recover attorney's fees for representing himself.]

COUNT VIII

(Truth in Lending Act — 15 U.S.C. § 1601 et seq.)

(Plaintiff v. [Golden 1 and any other TILA defendant])

56. Plaintiff incorporates by reference each allegation set forth above.

57. [State the specific TILA disclosure or notice that was required, the document that omitted or misstated it, the date, and who was responsible. Plead any fraud theory with particularity. Fed. R. Civ. P. 9(b). State the limitations theory under 15 U.S.C. § 1640(e).]

58. [Causation and statutory or actual damages, as the statute allows.]

COUNT IX

(Rees-Levering Automobile Sales Finance Act)

(Cal. Civ. Code §§ 2983.2 and 2983.3)

(Plaintiff v. [Golden 1 and any other defendant on this count])

59. Plaintiff incorporates by reference each allegation set forth above.

60. [State the missing Notice of Intent to Dispose, the defective Notice of Plan to Sell, the false accusation of "criminal acts of violence," and the loss of the right of reinstatement. Plead the false statement with particularity. Fed. R. Civ. P. 9(b).]

61. [Causation and damages.]

COUNT X

(Wrongful Repossession and Conversion)

(Plaintiff v. [Defendants for this count])

62. Plaintiff incorporates by reference each allegation set forth above.

63. [State Plaintiff's ownership or right to possession, each Defendant's act of taking or disposing of the vehicle or the legal papers, and the demand and refusal if one is an element. Identify the backdated REG 119 and the unrelated McGhee contract with particularity. Fed. R. Civ. P. 9(b).]

64. [Causation and damages, including the July 10, 2026 sale and the August 13, 2026 deficiency demand of $6,067.84, if those facts are retained.]

COUNT XI

(Collateral Recovery Act)

(Cal. Bus. & Prof. Code §§ 7507.9 and 7507.10)

(Plaintiff v. [Paramount, Braun, Golden 1, and any other defendant on this count])

65. Plaintiff incorporates by reference each allegation set forth above.

66. [State the missed 48-hour notice of seizure and the missed personal-property inventory, who had the duty, and the dates the vehicle moved from Goleta to Ventura County and then to Mira Loma.]

67. [Causation and damages.]

COUNT XII

(Lien Sale — Cal. Civ. Code §§ 3068–3074)

(Plaintiff v. [805 Roadside, Five Star, and any other defendant on this count])

68. Plaintiff incorporates by reference each allegation set forth above.

69. [State the May 11, 2026 Notice of Pending Lien Sale, the "$4,000 or less" valuation, why that valuation was false, and the authority relied on. Plead the fraud theory with particularity. Fed. R. Civ. P. 9(b).]

70. [Causation and damages.]

COUNT XIII

(Rosenthal Fair Debt Collection Practices Act)

(Cal. Civ. Code § 1788 et seq.)

(Plaintiff v. [Defendants for this count])

71. Plaintiff incorporates by reference each allegation set forth above.

72. [State that the defendant is a debt collector, that the obligation is a consumer debt, and the specific prohibited act, with dates. Plead any false or misleading representation with particularity. Fed. R. Civ. P. 9(b).]

73. [Causation and damages. Do not request attorney's fees for self-representation.]

COUNT XIV

(Unfair Competition — Cal. Bus. & Prof. Code § 17200)

(Plaintiff v. [Defendants for this count])

74. Plaintiff incorporates by reference each allegation set forth above.

75. [State the unlawful, unfair, or fraudulent prong, the business practice, and the restitution sought. Section 17200 does not provide damages. Plead any fraudulent prong with particularity. Fed. R. Civ. P. 9(b).]

76. [Restitution and injunctive relief.]

VI. TOLLING OF THE STATUTES OF LIMITATIONS

77. [State any discovery, fraudulent-concealment, or equitable-tolling facts, including the dates notice was withheld and the date Plaintiff received the June 11, 2026 Notice of Plan to Sell. Delete this section if no tolling theory is needed.]

VII. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court enter judgment against Defendants and award the following relief:

a. Compensatory damages in an amount to be determined at trial;

b. [Statutory damages, where a statute pleaded above allows them;]

c. Declaratory relief;

d. Prospective injunctive relief;

e. Punitive damages against the individual Defendants, where the law allows them;

f. Pre-judgment and post-judgment interest;

g. Costs of suit; and

h. Such other and further relief as the Court deems just and proper.

VIII. DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable. Fed. R. Civ. P. 38(b).

Dated: [Month Day, Year]

Respectfully submitted,

NYREE DAQUAN HINTON
Plaintiff, Pro Se
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Easton, PA 18045
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VERIFICATION

I, Nyree Daquan Hinton, declare under penalty of perjury under 28 U.S.C. § 1746 that I am the Plaintiff in this action, that I have read the foregoing Complaint, and that the factual allegations in it are true and correct to the best of my knowledge, information, and belief.

Executed on [Month Day, Year], at [City, State].

NYREE DAQUAN HINTON

EXHIBIT INDEX

Exhibit A CAD Incident Detail Report, Incident #SBSO260042030

Exhibit B Booking Form #1193941 and Citation #AS363045

Exhibit C Jail financial record, Transaction #49925

Exhibit D CHP 180 Vehicle Report

Exhibit E 805 Roadside Towing Invoice #68306

Exhibit F Notice of Pending Lien Sale, Seq. #260511-002

Exhibit G DMV Certificate of Repossession (REG 119)

Exhibit H SBSO Legal Owner Early Release Agreement

Exhibit I Notice of Plan to Sell and deficiency demand

Exhibit J Government Code claim notices of June 7 and June 13, 2026

[Attach each exhibit. This index lists documents named in the Pages folder. None is attached to this draft.]