

EXHIBIT A

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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **FOR THE COUNTY OF SAN DIEGO**
9 **NORTH COUNTY DIVISION**

10
11 AGRO DYNAMICS, LLC a Wyoming Limited) Case No.: 37-2020-00034326-CU-CR-NC
Liability Company,)
12) Plaintiff,)
13 vs.) **COMPLAINT FOR VIOLATIONS OF 42**
14) **U.S.C. § 1983; VIOLATION OF**
DRUG ENFORCEMENT ADMINISTRATION,) **CALIFORNIA CONSTITUTION;**
15 SAN DIEGO COUNTY, and SPECIAL AGENTS) **CONVERSION; DAMAGES**
PAUL GELLES, ERIC BALL, KIERAN)
16 GRACIA, MARSHA DAWE, ROSS VAN) Assigned to Judge:
NOSTRAND, AND JEREMY FEUZ; FRANK)
17 HASKELL, ANDREW AGUILAR, JASON)
STEIN, TIMOTHY SMITH, MICHAEL)
18 ASTORGA, CHRISTOPHER MORRIS, SGT.)
STEVE BODINE, DET. JUSTIN MOORE, DET.)
19 DWAYNE PRICKETT, DET. CHRISTOPHER)
PEREZ, AND DET. RICARDO ANDRADE; and)
DOES 1 to 50 inclusive,)
20
21 Defendants.

22 **INTRODUCTION OF THE CASE**

23 On or about December 20, 2018, the Federal Farm bill authorized the legal cultivation of
24 hemp. On August 22, 2019, Plaintiffs herein obtained a Registration Issuance from the County of
25 San Diego for the legal cultivation of hemp on their premises. Relying on this permit, Plaintiffs
26 expended considerable time and money and planted approximately 3000 hemp plants that,
27 according to a laboratory test, had less than .3% THC. On September 10, 2019 a law enforcement
28 officer, Defendant Paul Gelles, conducted aerial reconnaissance in support of marijuana eradication

1 operations in the area. Based on the officer's observations of what appeared to be growing
2 marijuana and the failure of law enforcement to make any investigation of San Diego County
3 records which would have revealed the hemp Registration Issuance, a search warrant was issued on
4 September 11, 2019. The next day, September 12, 2019, law enforcement officers executed the
5 search warrant. Upon their arrival on the premises, a tenant in possession advised the officers that
6 there was a legal Registration Issuance from the County of San Diego for the hemp growing on the
7 premises. Law enforcement disregarded this information and continued to seize and destroy all
8 plants that appeared to be marijuana.

9
10 **THE PARTIES**

11 1. Plaintiff Agro Dynamics, LLC is limited liability company organized under the laws
12 of the State of Wyoming and registered with the California Secretary of State to conduct business
13 in California.

14 2. Defendant Drug Enforcement Administration is now and, at all times herein alleged,
15 is, a public entity organized and existing under the laws of the United States of America.

16 3. Defendant San Diego County is now, and, at all times herein alleged, is, a public
17 entity organized and existing under the laws of the State of California.

18 4. Defendant Special Agent Paul Gelles is now, and, at all times herein alleged, was a
19 Special Agent of the Drug Enforcement Administration. On information and belief, Special Agent
20 Gelles is a citizen of the State of California and a resident of the County of San Diego.

21 5. Defendant Special Agent Eric Ball is now, and, at all times herein alleged, was a
22 Special Agent of the Drug Enforcement Administration. On information and belief, Special Agent
23 Ball is a citizen of the State of California and a resident of the County of San Diego.

24 6. Defendant Special Agent Kieran Garcia is now, and, at all times herein alleged, was
25 a Special Agent of the Drug Enforcement Administration. On information and belief, Special
26 Agent Garcia is a citizen of the State of California and a resident of the County of San Diego.

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1 7. Defendant Special Agent Marsha Dawe is now, and, at all times herein alleged, was
2 a Special Agent of the Drug Enforcement Administration. On information and belief, Special
3 Agent Dawe is a citizen of the State of California and a resident of the County of San Diego.

4 8. Defendant Special Agent Ross Van Nostrand is now, and, at all times herein alleged,
5 was a Special Agent of the Drug Enforcement Administration. On information and belief, Special
6 Agent Van Nostrand is a citizen of the State of California and a resident of the County of San
7 Diego.

8 9. Defendant Special Agent Jeremy Feuz is now, and, at all times herein alleged, was a
9 Special Agent of the Drug Enforcement Administration. On information and belief, Special Agent
10 Feuz is a citizen of the State of California and a resident of the County of San Diego.

11 10. Defendant Frank Haskell is now, and, at all times herein alleged, was a Task Force
12 Officer of the Drug Enforcement Administration. On information and belief, Frank Haskell is a
13 citizen of the State of California and a resident of the County of San Diego.

14 11. Defendant Andrew Aguilar is now, and, at all times herein alleged, was a Task Force
15 Officer of the Drug Enforcement Administration. On information and belief, Andrew Aguilar is a
16 citizen of the State of California and a resident of the County of San Diego.

17 12. Defendant Jason Stein is now, and, at all times herein alleged, was a Task Force
18 Officer of the Drug Enforcement Administration. On information and belief, Jason Stein is a
19 citizen of the State of California and a resident of the County of San Diego.

20 13. Defendant Timothy Smith is now, and, at all times herein alleged, was a Task Force
21 Officer of the Drug Enforcement Administration. On information and belief, Mr. Smith is a
22 citizen of the State of California and a resident of the County of San Diego.

23 14. Defendant Michael Astorga is now, and, at all times herein alleged, was a Task Force
24 Officer of the Drug Enforcement Administration. On information and belief, Mr. Astorga is a
25 citizen of the State of California and a resident of the County of San Diego.

26 15. Defendant Christopher Morris is now, and, at all times herein alleged, was a Task
27 Force Officer of the Drug Enforcement Administration. On information and belief, Mr. Morris is
28 a citizen of the State of California and a resident of the County of San Diego.

1 16. Defendant Steve Bodine is now, and, at all times herein alleged, was a sergeant of
2 the San Diego Sheriff's Department. On information and belief, Mr. Bodine is a citizen of the
3 State of California and a resident of the County of San Diego.

4 17. Defendant Justin Moore is now, and, at all times herein alleged, was a detective of
5 the San Diego Sheriff's Department. On information and belief, Mr. Moore is a citizen of the
6 State of California and a resident of the County of San Diego.

7 18. Defendant Dwayne Prickett is now, and, at all times herein alleged, was a detective
8 of the San Diego Sheriff's Department. On information and belief, Mr. Prickett is a citizen of the
9 State of California and a resident of the County of San Diego.

10 19. Defendant Christopher Perez is now, and, at all times herein alleged, was a detective
11 of the San Diego Sheriff's Department. On information and belief, Mr. Perez is a citizen of the
12 State of California and a resident of the County of San Diego.

13 20. Defendant Ricardo Andrade is now, and, at all times herein alleged, was a detective
14 of the San Diego Sheriff's Department. On information and belief, Mr. Andrade is a citizen of the
15 State of California and a resident of the County of San Diego.

16 21. DOES 1 through 50 are unknown to Plaintiff. Plaintiff will amend the Complaint to
17 identify them when their identities are ascertained. Plaintiff is informed and believes that each of
18 DOES 1 through 50 was the principal, parent, subsidiary, affiliate, agent, servant, employee,
19 employer, director, officer, co-conspirator, shareholder, director, partner, joint-venturer, and/or co-
20 venturer of his/her/its co-defendants and, in doing the things herein alleged, was acting within the
21 course and scope of his/her/its employment and/or within his/her/its authority, and/or in concert
22 with and/or with the permission, ratification, or consent of his/her/its co-defendants, or otherwise
23 as a tortfeasor. Plaintiff is informed and believes that each of DOES 1 through 50 is responsible in
24 some manner for the occurrences and omissions herein alleged, and that Plaintiff's damages as
25 herein alleged were proximately caused by their conduct.

26 22. Plaintiff is informed and believes and thereon allege that each of the defendants
27 designated herein as DOE took part in and participated with Defendants in all matters referred to
28 herein and was in some manner responsible for the injuries and losses suffered by Plaintiff.

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