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10 JOYCE JACKSON, Individually and  
11 as Successor in Interest of TIMOTHY  
12 DEAN, Deceased; and JOANN  
13 CAMPBELL, Individually and as  
14 Successor in Interest of  
15 TIMOTHY DEAN

16 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
17 LOS ANGELES COUNTY, CENTRAL DIVISION

18 JOYCE JACKSON, Individually and  
19 as Successor in Interest of TIMOTHY  
20 DEAN, Deceased; and JOANN  
21 CAMPBELL, Individually and as  
22 Successor in Interest of  
23 TIMOTHY DEAN,

24 Plaintiffs.

25 v.

26 EDWARD BUCK, Individually; and  
27 DOES 1 through 20, inclusive,

28 Defendant.

CASE NO.:

**COMPLAINT FOR DAMAGES**

1. WRONGFUL DEATH & SURVIVAL DAMAGES
2. SEXUAL BATTERY
3. ASSAULT
4. BATTERY
5. HATE VIOLENCE
6. DRUG DEALER LIABILITY
7. NEGLIGENCE (PREMISES LIABILITY)
8. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

Complaint Filed: January 7, 2020

**DEMAND FOR JURY TRIAL**

JOYCE JACKSON, Individually and as Successor in Interest of TIMOTHY DEAN,  
deceased, and JOANN CAMPBELL, Individually and as Successor in Interest of TIMOTHY

1 DEAN, deceased, complain of EDWARD BUCK and DOES 1 through 20, inclusive (hereafter  
2 collectively “Defendants”), and bring this combined Survival and Wrongful Death Action, and  
3 as for their claims and causes of action allege as follows:

4 **INTRODUCTION**

5 1. JOYCE JACKSON’s and JOANN CAMPBELL’s are the sisters of TIMOTHY  
6 DEAN, a Black gay man whose life was abruptly and tragically cut short on January 7, 2019  
7 when he died after being injected with a lethal dose of crystal methamphetamine at the hands of  
8 EDWARD BUCK, a wealthy white man who has a well-documented history of isolating Black  
9 men for perverted sexual encounters during which he injects them with crystal  
10 methamphetamine in the confines of a drug den in his West Hollywood apartment.

11 **PARTIES**

12 2. Plaintiff JOYCE JACKSON (hereafter “Ms. Jackson” or “Plaintiff”) is, and at all  
13 times herein mentioned was, a citizen and resident of the State of Florida. Ms. Jackson is the  
14 surviving sibling of TIMOTHY DEAN (hereafter “Mr. Dean” or “Decedent”), now deceased.

15 3. Plaintiff JOANN CAMPBELL (hereafter “Ms. Campbell” or “Plaintiff”) is, and  
16 at all times herein mentioned was, a citizen and resident of the State of Florida. Ms. Jackson is  
17 the surviving sibling of TIMOTHY DEAN (hereafter “Mr. Dean” or “Decedent”), now  
18 deceased.

19 4. Ms. Jackson and Ms. Campbell are the Successors in Interest of Mr. Dean,  
20 Deceased, and they are collectively entitled to bring this Survival Action pursuant to section  
21 377.30 of the California Code of Civil Procedure because there is no personal representative of  
22 the Estate of Mr. Dean.

23 5. Ms. Jackson and Ms. Campbell are entitled to bring this Wrongful Death Action  
24 pursuant to subdivision (a) of section 377.60 of the California Code of Civil Procedure.

25 6. Mr. Dean was, at all times herein mentioned, a citizen and resident of the County  
26 of Los Angeles in the State of California.



1           11.     On or around January 7, 2019, Mr. Dean went to the then-residence of Mr.  
2 Buck's, located at 1234 Laurel Avenue in West Hollywood, CA 90046.

3           12.     Upon information and belief, Mr. Buck had previously injected Mr. Dean with  
4 crystal methamphetamine.

5           13.     Within hours of arriving at Mr. Buck's West Hollywood residence, Mr. Dean  
6 was dead. According to the official autopsy report, several vials, syringes, and containers of  
7 narcotics were recovered from Mr. Buck's residence incident to the recovery of Mr. Dean's  
8 lifeless body from Mr. Buck's residence on January 7, 2019. The autopsy report further  
9 described how these vials, syringes, and containers were littered throughout Mr. Buck's  
10 residence.

11          14.     On or around March 25, 2019, the County of Los Angeles Department of  
12 Coroner preliminarily concluded that Mr. Dean's death was caused by an accidental  
13 methamphetamine overdose.

14          15.     Despite the Coroner's preliminary conclusion, the County of Los Angeles  
15 maintained an active homicide investigation into Mr. Dean's death. This is because Mr. Dean  
16 was not the first Black gay man to wind up dead from methamphetamine toxicity in the  
17 residence of Mr. Buck. On approximately July 27, 2017, Gemmel Moore lifeless body was  
18 recovered from the exact same residence, in the exact same living room, and upon the exact  
19 same mattress as Mr. Dean's.

20          16.     Mr. Buck had previously solicited sex from Mr. Moore on numerous occasions.  
21 During previous encounters, Mr. Buck would insist upon forcibly injecting Mr. Moore or  
22 forcing Mr. Moore to be injected with crystal methamphetamine. Before encountering Mr.  
23 Buck, Mr. Moore had never used crystal methamphetamine. Mr. Buck introduced Mr. Moore  
24 to crystal methamphetamine, administering to Mr. Moore what he narrated in his journal as his  
25 first and "extremely painful" injection. After injecting Mr. Moore with crystal

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27           2014; \$1,000 to Scott Svonkin for Los Angeles Community College District on February 15, 2015;  
28           \$500 to Sydney Kamlager for Los Angeles Community College District on February 7, 2015; and  
            \$500 to Scott Houston for West Basin Municipal Water District.

1 methamphetamine, Mr. Buck required Mr. Moore to view hardcore gay male pornography,  
2 which played loudly on a large flatscreen television set situated in Mr. Buck's living room. Mr.  
3 Buck further required Mr. Moore to masturbate and engage in other autoerotic sex acts for Mr.  
4 Buck's sexual gratification and voyeuristic pleasure. Reflecting on his encounters with Mr.  
5 Buck, Mr. Moore wrote in his final journal entry, dated December 3, 2016, "If it didn't hurt so  
6 bad, I'd kill myself, but I'll let Ed Buck do it for now."

7         17. During the course of the County of Los Angeles's homicide investigation, other  
8 Black gay men (hereinafter "Does 21-30") came forward and shared about their own encounters  
9 with Mr. Buck. Each of Does 21-30, many of whom were strangers to one another,  
10 independently described their first-hand experiences of being forcefully pressured to ingest  
11 and/or being forcibly injected with crystal methamphetamine by Mr. Buck, whom they alleged  
12 had a predatory and injurious system of soliciting Black gay men and watching them cling to  
13 life while battling symptoms of methamphetamine toxicity after he intravenously administered  
14 large doses of the drug to them. Each of Does 21-30 further independently described their first-  
15 hand experiences of engaging in acts or acts of a generally sexual nature with and in front of  
16 Mr. Buck in exchange for compensation in the form of temporary housing, money, alcohol,  
17 marijuana, and other substances.

18         18. On approximately March 21, 2019, one of Does 21-30 complained of four  
19 incidents involving Mr. Buck. During each of these incidents, Mr. Buck laced this one of Does  
20 21-30 with a drug that caused him to lose consciousness. During one of these incidents, this  
21 one of Does 21-30 awoke to Mr. Buck injecting him with crystal methamphetamine against his  
22 will. During another one of these incidents, this one of Does 21-30 recalled how Mr. Buck  
23 referred to him as a "nigger."

24         19. On approximately May 8, 2019, one of Does 21-30 complained of an incident  
25 involving Mr. Buck that took place in late April of 2019. This one of Does 21-30 described  
26 how Mr. Buck enticed him to enter his home. Mr. Buck offered to provide this one of Does 21-  
27 30 with temporary housing and compensation in exchange for engaging in or performing sexual  
28 acts. Mr. Buck proceeded to aggressively pressure this one of Does 21-30 into ingesting crystal

1 methamphetamine and viewing homemade pornographic videorecorded depicting Mr. Moore  
2 masturbating while apparently intoxicated on crystal methamphetamine.

3 20. Taken together, the criminal complaints made by Does 21-30 contained several  
4 eye-witness accounts constituting probative evidence of the following felonious and  
5 misdemeanor criminal acts: (1) that Edward Buck regularly possesses and consumes illicit  
6 narcotics, including crystal methamphetamine; (2) that Edward Buck regularly solicits sex from  
7 Black gay men in exchange for temporary housing and/or monetary compensation; and (3) that  
8 Edward Buck regularly attempts to coerce the Black men he solicits for sex to ingest or be  
9 forcibly injected with crystal methamphetamine.

10 21. On approximately September 17, 2019, Mr. Buck was arrested and charged with  
11 operating a drug house and providing methamphetamine to one of Does 21-30, a 37-year-old  
12 Black gay man who suffered an overdose at Buck's West Hollywood residence the week prior.

13 22. On approximately September 19, 2019, the United States of America filed  
14 federal criminal charges against Mr. Buck for distributing to Mr. Dean the narcotics that caused  
15 his death.

16 **FIRST CAUSE OF ACTION: WRONGFUL DEATH & SURVIVAL DAMAGES**

17 **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

18 23. Plaintiffs restate, as though fully set forth herein, the allegations contained in  
19 each of the paragraphs above.

20 24. As described herein on information and belief, Plaintiffs allege that on or about  
21 January 7, 2019, Mr. Buck injected Mr. Dean with a lethal dose of crystal methamphetamine.

22 25. As a direct and proximate result Mr. Buck's wrongful conduct, Mr. Dean died  
23 and his heirs, Plaintiffs, have been deprived of his care, society, comfort, attention, services and  
24 support to their general damages in an amount exceeding the Superior Court's jurisdictional  
25 minimum according to proof at trial. As a direct and proximate result of Mr. Buck's wrongful  
26 conduct, Plaintiffs have incurred funeral and burial expenses and other special damages  
27 according to proof at trial.

1           26.     As a direct and proximate result of Mr. Buck’s wrongful conduct, Mr. Dean was  
2 forced to endure severe mental and physical anguish and fear of impending death and he  
3 ultimately suffered severe physical injuries which caused his death. As a result of the  
4 foregoing, Plaintiffs, as Successors in Interest of Mr. Dean, hereby assert survivors’ claims on  
5 behalf of Mr. Dean, Deceased, pursuant to Sections 377.10, 377.20, 377.30, *et seq.*, of the Code  
6 of Civil Procedure, and based upon all other applicable statutes and case law and succeed to the  
7 following causes of action that might have been brought by Mr. Dean, Deceased:

8                                   **SECOND CAUSE OF ACTION: SEXUAL BATTERY**

9                                   **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

10           27.     Ms. Jackson and Ms. Campbell, as Successors in Interest of Mr. Dean, Deceased,  
11 restate and incorporate by reference, as though fully set forth herein, the allegations contained in  
12 each of the paragraphs above.

13           28.     Cal. Civ. Code Section 1708.5(a) provides: “A person commits a sexual battery  
14 who does any of the following: (1) Acts with the intent to cause a harmful or offensive contact  
15 with an intimate part of another, and a sexually offensive contact with that person directly or  
16 indirectly results; (2) Acts with the intent to cause a harmful or offensive contact with another  
17 by use of his or her intimate part, and a sexually offensive contact with that person directly or  
18 indirectly results; (3) Acts to cause an imminent apprehension of the conduct described in  
19 paragraph (1) or (2), and a sexually offensive contact with that person directly or indirectly  
20 results.”

21           29.     Mr. Buck is a “person” under section 1708.5 of the Civil Code.

22           30.     Mr. Buck intended to cause harmful and offensive sexual contact with Mr. Dean  
23 and a sexually offensive contact with Mr. Dean resulted, either directly or indirectly, when Mr.  
24 Buck distributed or furnished crystal methamphetamine to Mr. Dean and then forcibly and  
25 repeatedly injected Mr. Dean with crystal methamphetamine while, upon information and  
26 belief, requiring Mr. Dean to view hardcore pornographic films, masturbate and perform other  
27 various sexually graphic acts.

1           31.     At no time did Mr. Dean consent, either expressly or impliedly, to Mr. Buck's  
2 acts.

3           32.     Mr. Dean lacked the mental capacity to consent due to his being intoxicated as a  
4 result of being forcibly injected with crystal methamphetamine by Mr. Buck.

5           33.     Mr. Dean was harmed and offended by Mr. Buck's conduct, as any reasonable  
6 person in his situation would have been.

7           34.     As a direct and proximate result of Mr. Buck's actions, Mr. Dean suffered  
8 special and general damages, including physical pain, mental suffering, loss of enjoyment of  
9 life, anxiety, embarrassment, humiliation, and severe emotional distress, all in an amount  
10 exceeding the Superior Court's jurisdictional minimum according to proof at trial.  
11 Additionally, Mr. Dean suffered a loss of earnings and other economic opportunities.

12           35.     Mr. Buck's conduct was malicious and oppressive, and done with a conscious  
13 disregard of Mr. Dean's rights. Mr. Buck also acted with the knowledge of or with reckless  
14 disregard for the fact that his conduct was certain to cause injury and/or humiliation to Mr.  
15 Dean. Ms. Jackson and Ms. Campbell are further informed and believe that Mr. Buck intended  
16 to cause fear, physical injury and/or pain and suffering to Mr. Dean. Ms. Jackson and Ms.  
17 Campbell, as Successors in Interest of Mr. Dean, Deceased, are entitled to recover punitive and  
18 exemplary damages from Mr. Buck according to proof at trial.

19                           **THIRD CAUSE OF ACTION: ASSAULT**

20                           **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

21           36.     Ms. Jackson and Ms. Campbell, as Successors in Interest of Mr. Dean, Deceased,  
22 restate and incorporate by reference, as though fully set forth herein, the allegations contained in  
23 each of the paragraphs above.

24           37.     Mr. Buck intended to cause Mr. Dean apprehension of an imminent harmful and  
25 offensive contact with his person when Mr. Buck distributed or furnished crystal  
26 methamphetamine to Mr. Dean and then forcibly and repeatedly injected Mr. Dean with crystal  
27 methamphetamine while, upon information and belief, requiring Mr. Dean to view hardcore  
28 pornographic films, masturbate and perform other various sexually graphic acts.







1                   **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

2           53.     Ms. Jackson and Ms. Campbell, as Successors in Interest of Mr. Dean, Deceased,  
3     restates and incorporates by reference, as though fully set forth herein, the allegations contained  
4     in each of the paragraphs above.

5           54.     Cal. Civ. Code Section 51.7 (a) states “all persons within the jurisdiction of this  
6     state have the right to be free from any violence, or intimidation by threat of violence,  
7     committed against their persons or property because of political affiliation, or on account of any  
8     characteristic listed or defined in subdivision (b) or (e) of Section 51 ... or because another  
9     another person perceives them to have one or more of those characteristics.”

10          55.     Upon information and belief, Mr. Buck had a strong sexual preference for Black  
11     gay men. Mr. Buck consistently sought out Black gay men, just like Mr. Moore, to inject them  
12     with lethal doses of crystal methamphetamine. During these predatory encounters, Mr. Buck  
13     regularly referred to his victims as niggers. Mr. Buck sought out Mr. Moore because he is  
14     Black.

15          56.     At all times mentioned herein, Mr. Dean had the right to be free from any  
16     violence, or intimidation by threat of violence, committed against his person on account of his  
17     race.

18          57.     Mr. Buck subjected Mr. Dean to violence, and/or intimidation by threats of  
19     violence, against his person on account of his race and/or acted to deny Mr. Dean his right to be  
20     free from any violence, or intimidation by threat of violence, committed against his person on  
21     the account of his race.

22          58.     In doing so, Mr. Buck violated Mr. Dean’s civil rights, as set forth in the Ralph  
23     Civil Rights Act, which is codified in Cal. Civ. Code § 51.7.

24          59.     As a direct and proximate result of Mr. Buck’s actions, Mr. Dean suffered  
25     special and general damages, including physical pain, mental suffering, loss of enjoyment of  
26     life, anxiety, embarrassment, humiliation, and severe emotional distress, all in an amount  
27     exceeding the Superior Court’s jurisdictional minimum according to proof at trial.

28     Additionally, Mr. Dean suffered a loss of earnings and other economic opportunities.

1           60.     Mr. Buck’s conduct was malicious and oppressive, and done with a conscious  
2 disregard of Mr. Dean’s rights. Mr. Buck also acted with the knowledge of or with reckless  
3 disregard for the fact that his conduct was certain to cause injury and/or humiliation to Mr.  
4 Dean. Ms. Jackson and Ms. Campbell, as Successors in Interest of Mr. Dean, Deceased, are  
5 further informed and believes that Mr. Buck intended to cause fear, physical injury and/or pain  
6 and suffering to Mr. Dean. Ms. Jackson and Ms. Campbell, as Successors in Interest of Mr.  
7 Dean, Deceased, is entitled to recover punitive and exemplary damages from Mr. Buck  
8 according to proof at trial.

9           61.     In addition to and/or in lieu of Ms. Jackson and Ms. Campbell’s, as Successors in  
10 Interest of Mr. Dean, Deceased, election, Ms. Jackson and Ms. Campbell are entitled to receive  
11 and hereby seek statutory damages pursuant to Cal. Civ. Code § 52(b), including actual and  
12 exemplary damages.

13           62.     Pursuant to Cal. Civ. Code § 52(b)(3), Ms. Jackson and Ms. Campbell, as  
14 Successors in Interest of Mr. Dean, Deceased, have incurred, and will continue to incur,  
15 attorneys’ fees in the prosecution of this action and therefore demand such reasonable attorneys’  
16 fees and costs as set by the Court.

17                           **SIXTH CAUSE OF ACTION: DRUG DEALER LIABILITY**

18                           **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

19           63.     Ms. Jackson and Ms. Campbell, in their individual capacities and as Successors  
20 in Interest of Mr. Dean, Deceased, restate and incorporates by reference, as though fully set  
21 forth herein, the allegations contained in each of the paragraphs above.

22           64.     The California Drug Dealer Liability Act, codified as Health and Safety Code  
23 sections 11700, *et seq.*, was enacted to provide a civil remedy for damages to persons injured as  
24 a result of the use of an illegal controlled substance.

25           65.     Health and Safety Code section 11705, subdivision (a)(1), which is part of the  
26 Drug Dealer Liability Act, provides that a “parent, legal guardian, child, spouse, or sibling” of  
27 the individual controlled substance user is entitled to bring an action for damages caused by an  
28 individual’s use of an illegal controlled substance.

1           66.     Health and Safety Code section 11705, subdivision (b)(1) states that a person  
2 entitled to bring an action under the Drug Dealer Liability Act may seek damages from a person  
3 who sold, administered, or furnished an illegal controlled substance to the individual user of the  
4 illegal controlled substance, as well as from a person who knowingly participated in the  
5 marketing of illegal controlled substances.

6           67.     As described above, Mr. Buck wrongfully and illegally supplied, marketed and  
7 distributed crystal methamphetamine to Mr. Dean on or about January 7, 2019. On or about  
8 January 7, 2019, Mr. Buck intravenously administered crystal methamphetamine to Mr. Dean,  
9 who shortly thereafter died as a result.

10          68.     Mr. Dean's death was tragic and easily avoidable. It has had a debilitating and  
11 devastating effect on his friends and family, not least on his sisters, Ms. Jackson and Ms.  
12 Campbell.

13          69.     Health and Safety Code section 11705, subdivision (d), which is part of the Drug  
14 Dealer Liability Act, entitles Plaintiff to recover the following: "(1) Economic damages,  
15 including, but not limited to, the cost of treatment and rehabilitation, medical expenses, loss of  
16 economic or educational potential, loss of productivity, absenteeism, support expenses,  
17 accidents or injury, and any other pecuniary loss proximately caused by the use of an illegal  
18 controlled substance. (2) Noneconomic damages, including, but not limited to, physical and  
19 emotional pain, suffering, physical impairment, loss of companionship, services and  
20 consortium, and other nonpecuniary losses proximately caused by an individual's use of an  
21 illegal controlled substance. (3) Exemplary damages. (4) Reasonable attorney fees. (5) Costs  
22 of suit, including, but not limited to, reasonable expenses for expert testimony. Accordingly, by  
23 way of this action, Ms. Jackson and Ms. Campbell, in her individual capacity and as Successor  
24 in Interest of Mr. Dean, Deceased, seeks all such available damages in an amount exceeding the  
25 Superior Court's jurisdictional minimum according to proof at trial.

26          70.     Mr. Buck's conduct was malicious and oppressive, and done with a conscious  
27 disregard of Mr. Dean's rights. Mr. Buck also acted with the knowledge of or with reckless  
28 disregard for the fact that his conduct was certain to cause injury and/or humiliation to Mr.

1 Moore. Ms. Jackson and Ms. Campbell, as Successors in Interest of Mr. Moore, Deceased, are  
2 further informed and believes that Mr. Buck intended to cause fear, physical injury and/or pain  
3 and suffering to Mr. Moore. Ms. Jackson and Ms. Campbell, as Successors in Interest of Mr.  
4 Moore, Deceased, are entitled to recover punitive and exemplary damages from Mr. Buck  
5 according to proof at trial.

6 **SEVENTH CAUSE OF ACTION: NEGLIGENCE (PREMISES LIABILITY)**

7 **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

8 71. Ms. Jackson and Ms. Campbell, as Successors in Interest of Mr. Dean, Deceased,  
9 restate and incorporate by reference, as though fully set forth herein, the allegations contained in  
10 each of the paragraphs above.

11 72. In the alternative, Ms. Jackson and Ms. Campbell allege that Mr. Buck was  
12 negligent in the use and/or maintenance of the property on which Mr. Dean was harmed.

13 73. Mr. Buck occupied or controlled the property on which Mr. Dean was harmed.  
14 As the occupier or controller of the property, Mr. Buck was under a duty to manage and act  
15 reasonably to control his property and guests to prevent injury from, among other things,  
16 foreseeable sexual battery, battery, assault, and injuries resulting from the distribution,  
17 manufacturing, or furnishing of illegal controlled substances to Mr. Dean.

18 74. Based on information and belief, as described herein, Ms. Jackson and Ms.  
19 Campbell allege that Mr. Buck has a history of hosting sexual encounters at the property during  
20 which he facilitated the distribution, manufacturing or furnishing of illegal controlled  
21 substances to his guests, into whom Mr. Buck forcibly injected crystal methamphetamine. Mr.  
22 Buck was aware or should have been aware of the risk of injury to his guests.

23 75. By virtue of the information Mr. Buck knew or should have known as alleged  
24 herein, Mr. Buck owed Mr. Dean a duty to prevent the kinds of injuries he sustained.

25 76. Mr. Buck breached that duty of care that was owed to Mr. Dean by his own  
26 conduct, as described herein. Among other things, when Mr. Buck forcibly and repeatedly  
27 injected Mr. Dean with crystal methamphetamine while, upon information and belief, requiring  
28 Mr. Dean to view hardcore pornographic films, masturbate and perform other various sexually

1 graphic acts, Mr. Buck breached his duty to ensure the safety of guests on his premises, such as  
2 Mr. Dean, who, as a result of Mr. Buck's breach of duty, died shortly after being injected with  
3 crystal methamphetamine on the living room floor of Mr. Buck's apartment.

4 77. As a direct and proximate result of Mr. Buck's actions, Mr. Dean suffered  
5 special and general damages, including physical pain, mental suffering, loss of enjoyment of  
6 life, anxiety, embarrassment, humiliation, and severe emotional distress, all in an amount  
7 exceeding the Superior Court's jurisdictional minimum according to proof at trial.  
8 Additionally, Mr. Dean suffered a loss of earnings and other economic opportunities.

9 78. Mr. Buck's conduct was malicious and oppressive, and done with a conscious  
10 disregard of Mr. Dean's rights. Mr. Buck also acted with the knowledge of or with reckless  
11 disregard for the fact that his conduct was certain to cause injury and/or humiliation to Mr.  
12 Dean. Ms. Jackson and Ms. Campbell, as Successors in Interest of Mr. Dean, Deceased, are  
13 further informed and believe that Mr. Buck intended to cause fear, physical injury and/or pain  
14 and suffering to Mr. Dean. Ms. Jackson and Ms. Campbell, as Successors in Interest of Mr.  
15 Dean, Deceased, are entitled to recover punitive and exemplary damages from Mr. Buck  
16 according to proof at trial.

17 **EIGHTH CAUSE OF ACTION: INTENTIONAL INFLICTION OF EMOTIONAL**  
18 **DISTRESS**

19 **(Against Defendant ED BUCK and DOES 1 through 20, Inclusive)**

20 79. Ms. Jackson and Ms. Campbell, as Successors in Interest of Mr. Dean, Deceased,  
21 restate and incorporates by reference, as though fully set forth herein, the allegations contained  
22 in each of the paragraphs above.

23 80. Mr. Buck knew or should have known that Mr. Dean did not want to be forcibly  
24 injected with crystal methamphetamine by Mr. Buck.

25 81. Mr. Buck's conduct was extreme and outrageous. Mr. Buck acted with reckless  
26 disregard for Mr. Dean's rights and feelings, and with deliberate indifference to the certainty  
27 that Mr. Dean would suffer emotional distress.





**DEMAND FOR JURY TRIAL**

Plaintiff hereby requests a trial by jury.

DATED: January 7, 2020



Hussain Turk, Esq.  
Attorney for Plaintiffs JOYCE JACKSON and  
JOANN CAMPBELL

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