



COUNTY OF HUMBOLDT
CLAIM FOR DAMAGES

RECEIVED
MAR 19 2024
BOARD OF SUPERVISORS

PLEASE COMPLETE BOTH PAGES OF THIS FORM AND BE SURE IT IS DATED AND SIGNED.

This claim must be filed with the Clerk of the Board of Supervisors within six (6) months after the accident or event. Where space is insufficient, please use additional paper and identify information by paragraph number. When the claim is complete, bring or mail to: **Humboldt County Clerk of the Board, Courthouse, 825 5th Street, Room 111, Eureka, California 95501-1153.**

CLAIMANT

Name: Darrin Richard Dickson
Address: c/o Law Office of Benjamin Mainzer, A.P.C.
305 K Street, Eureka, CA 95501
Telephone: (707) 234-5171
SSN:
DOB: 1/26/1972

The undersigned respectfully submits the following claim and information:

- Mailing address to which claimant desires notices to be sent, if other than above:
Through counsel: Law Office of Benjamin Mainzer, A.P.C., 305 K Street, Eureka, CA 95501
- Date, time and place of occurrence or transaction which gives rise to this claim:
Date: 9/26/2023
Time: 19:20
Place: Redwood Drive and Sprowl Creek Road in Garberville, California
- Specify the particular act/omission and circumstances which you believe caused the injury and/or damage:
See Attachment A
- Name(s) of employee(s) of County of Humboldt that you believe caused the injury/loss:
Ryan Campadonia and as described in Attachment A

5. Description of property damaged:
Broken window of vehicle, seizure of vehicle, seizure of property

6. Owner of property damaged:
Darrin Richard Dickson

7. Description of personal injury (if no personal injury, please state "None"):
See Attachment A

8. Name(s) of any other person(s) injured:

9. Names, addresses and telephone numbers of witnesses, doctors, hospitals, etc.:
 - a) Ryan Campadonia and persons identified in Attachment A

 - b) Persons named in HSCO Report 202304447

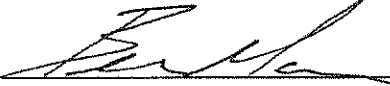
 - c) _____
10. Amount of reimbursement claimed, with computation. Please attach any supporting bills, receipts, or estimates of cost:
Damages will be demanded according to proof. Damages are in excess of \$10,000 and therefore not itemized.

11. Any additional information which may be helpful in considering this claim:

WARNING! IT IS A CRIMINAL OFFENSE TO FILE A FALSE CLAIM (Penal Code Section 72; Insurance Code Section 556).

I have read the matters and statements made in the above claim and I know the same to be true of my own knowledge, except as to those matters stated upon information or belief and as to such matters I believe the same to be true. I certify under penalty of perjury that the foregoing is true and correct.

Signed this 19th day of March, 2024.



CLAIMANT'S SIGNATURE

Attachment A

On or about September 26, 2023, at or around 7:20 pm, Humboldt County Deputy Sheriff Ryan Campadonia initiated a traffic stop on a vehicle owned and operated by Claimant Darrin Dickson, hereinafter, "Dickson." The stop occurred in the immediate vicinity of Redwood Drive and Sprowl Creek Road in Garberville, California. Allegedly, Deputy Campadonia observed Dickson run a stop sign and accelerate at an unsafe rate of speed. As will be detailed herein, beginning seconds after making what should have been an ordinary traffic stop, and with no good cause, Deputy Campadonia repeatedly employed excessive force on the person of Darrin Dickson, even though Dickson posed no threat to Deputy Campadonia or anyone else. After affecting an unnecessary arrest, Deputy Campadonia then retaliated against Dickson by impounding his vehicle even though doing so was not required. The aforementioned conduct was tortious, violative of Dickson's rights under the Constitutions of the United States and State of California and caused serious and lasting injury to Dickson.

At the time of the traffic stop, the vehicle operated by Dickson was legally owned and registered to him. There was no delay in stopping. Dickson quickly pulled over and parked his vehicle in a safe location as directed.

Dickson was known to Deputy Campadonia. Indeed, Deputy Campadonia had interacted with Dickson at least two times previously without altercation. During prior interactions, Dickson had never been physically combative with Campadonia, nor had any of Campadonia's prior contacts with Dickson culminated with any arrest. As far as Deputy Campadonia knew, Dickson had no criminal record. Deputy Campadonia however viewed Dickson negatively and considered him "uncooperative." The reason why Deputy Campadonia viewed Dickson as uncooperative was because on prior contacts, Dickson had elected not to answer questions Campadonia posed to him. Stated plainly, Deputy Campadonia had a negative opinion of Dickson because Dickson had previously chosen to exercise his rights afforded to him under the United States Constitution and Constitution of the State of California not to speak with him.

When Deputy Campadonia first approached the vehicle, Dickson was sitting calmly in the driver seat. The vehicle was turned off, and the driver's window was rolled down a sufficient amount for Dickson to be clearly heard by Campadonia. The condition of the vehicle windows was such that Dickson and the interior of the vehicle cabin were both clearly visible to persons outside of it. It was plain that nobody else was inside the vehicle other than Dickson. At or around this time, a second Humboldt County deputy sheriff, Julian Aguilera, arrived. Deputy Aguilera was close enough such that he was able to observe the interactions between Deputy Campadonia and Dickson. At this time, there was no articulable reason whatsoever for Campadonia to believe that Dickson was armed, violent, or posed any imminent danger to anyone.

Despite his compliance with the stop, immediately upon approaching Dickson's vehicle, Deputy Campadonia asked Dickson to open his door or roll down his window. Dickson promptly responded to this request by stating he could hear Deputy Campadonia "just fine." Dickson's voice was loud enough such that Deputy Campadonia could hear him. Deputy

Campadonia however then began to curse at Dickson. The cursing began only 10 seconds after first making with Dickson. Deputy Campadonia yelled at Dickson to “Open the fucking door!” Dickson responded again that he could hear Deputy Campadonia “just fine.” There was no credible officer safety reason for Dickson to alight from his vehicle. Dickson was unclear of the reason for the request and why Deputy Campadonia’s tone was so hostile.

Understandably, Dickson then asked Deputy Campadonia why he was being asked to get out of his vehicle. In response, Deputy Campadonia for the first time ordered Dickson out of the vehicle—even though there was still no officer safety reason for Dickson to exit the vehicle. Then, only 10 seconds after first issuing this command, Deputy Campadonia deployed his extendable baton and smashed the driver’s side window of Dickson’s vehicle. The entire preceding contact was less than 30 seconds total.

Deputy Campadonia’s baton struck Dickson in the forehead causing a bleeding contusion. Glass from the shattered window hit his face and got in his right eye causing a corneal abrasion and other bleeding cuts on his face and scalp.

There was no lawful reason for Deputy Campadonia to have deployed his baton at that time. His use of force was excessive and contrary to what a reasonable officer would deem appropriate to employ. Indeed, at the time of the baton strike, Deputy Aguilera was attempting to get the attention of Deputy Campadonia to calm him down and get him to put his baton away. It is important to note Deputy Aguilera was trying to get Deputy Campadonia to put his baton away because he did not believe breaking the window was an appropriate use of force. The aforementioned conduct was additionally violative of Department policy 303.5 in that Deputy Campadonia failed to weigh the need to immediately control a suspect against the risk of causing serious injury.

Instead of listening to Deputy Aguilera, seconds later, Deputy Campadonia continued to escalate the encounter. Deputy Campadonia yelled at Dickson, “do you want to get fucking tased?” Deputy Campadonia then drew his taser and pointed his taser at the chest of Dickson. In response to this, Deputy Aguilera used his hand to physically push the taser that Deputy Campadonia was pointing at Dickson away from Dickson. Deputy Aguilera later stated that he believed Dickson could be talked out of the vehicle. Deputy Aguilera continued to try to deescalate despite Deputy Campadonia’s unreasonable aggressive conduct. Based on his conduct and later statements, Deputy Aguilera clearly did not believe there was any reason for Deputy Campadonia to have drawn his taser, point it at Dickson and threaten to tase him. His use of force was excessive and contrary to what a reasonable officer would deem appropriate to employ. The aforementioned conduct by Deputy Campadonia was additionally violative of Department policies regarding taser use including 304.5.1 and 304.5.3.

Deputy Campadonia then reached into the vehicle and grabbed at Dickson, grabbing him momentarily by the throat, contrary to Department policy 300.3.7. Dickson yelled at Deputy Campadonia to get his hands off of his neck. While Dickson attempted to get Deputy Campadonia’s hands off of him, Deputy Campadonia struck Dickson in the face with his elbow.

At no time during the entire encounter, even considering Deputy Campadonia's excessive, violent conduct, did Dickson ever attempt to strike or injure anyone. Instead, Dickson used the minimal amount of force necessary to prevent further unreasonable injury to his person.

At or around this general time, multiple officers from the California Highway Patrol arrived. These officers too attempted to calmly speak to Dickson, but Deputy Campadonia continued to yell and curse at Dickson thwarting their efforts to deescalate the conflict that Deputy Campadonia had created. Dickson told these officers that he feared for his life.

After being assured by officers from the California Highway Patrol that he would not be harmed, Dickson voluntarily exited his vehicle and was placed under arrest by Deputy Campadonia without incident pursuant to Penal Code section 148(a)(1). This arrest however without probable cause.

Later, after he was placed in custody but still on scene, Campadonia asked Dickson what Dickson wanted done with his vehicle. Dickson asked Deputy Campadonia if he could leave his vehicle where it was parked. Deputy Campadonia remarked that the vehicle was legally parked told Dickson that he could. However, in retaliation for what Deputy Campadonia perceived as his earlier noncompliance, Deputy Campadonia intentionally acted contrary to Dickson's wishes and had Dickson's vehicle towed and impounded in contravention to Department policy 502.2.3. Deputy Campadonia knew or had reason to know that Dickson lived in his vehicle and knew or had reason to know that by towing and impounding the vehicle, he was taking away his only shelter. This conduct by Deputy Campadonia was punitive and intended to punish Dickson for exercising his rights.

The aforementioned conduct by Deputy Campadonia was reviewed as part of a use of force investigation conducted by the Humboldt County Sheriff's Department members sergeant Brian Taylor and lieutenant Brian Quenell at the direction of Sheriff William Honsal. Deputy Campadonia's conduct was determined to have been "in policy."

In doing the aforementioned, Deputy Campadonia repeatedly violated Dickson's rights under the United States Constitution and Constitution of the State of California. Violation of Dickson's rights under the First, Fourth and Fifth Amendments to the U.S. Constitution and Article 1, Section 13 of the California Constitution include, but are not limited to: the right to be free from unreasonable seizures and detentions; the right to be free from arrest without probable cause; the right to be free from unreasonable search and seizure of property; and the right to be free from excessive force. Additionally, the aforementioned conduct was violative of the right to protection from bodily restraint, harm, or personal insult, secured by California Civil Code Section 43, all enforceable pursuant to California Civil Code 52.1, 42 U.S.C. § 1983 and tort.

As his conduct was ratified as part of the use of force investigation, the aforementioned conduct was consistent with the customs, policies, practices, and/or procedures of the Humboldt County Sheriff's Office.

Based on the aforementioned, Dickson suffered personal injuries including but not limited to a contusion to his head, multiple abrasions to his face, a corneal abrasion and

significant emotional distress. His property remains seized. The amount of damages exceeds \$10,000 as of the date of the presentation of this claim.

1 PROOF OF SERVICE

2 I, BENJAMIN H. MAINZER, declare as follows:

3 I am a citizen of the United States and a resident of the County of Humboldt. My
4 business address is 305 K Street, Eureka, California 95501. I am over the age of 18 years
5 and not a party to the within cause. On this date, I served the following:

6 **1. Claim for Damages for Darrin Richard Dickson and Attachment A**

7 **BY MAIL:** By placing a copy thereof enclosed in a sealed envelope, addressed to as
8 shown below and placing the envelope for collection and mailing on the date and at the place
9 shown below, following our ordinary business practices. I am readily familiar with this
10 business' practice for collecting and processing correspondence for mailing. On the same day
11 that correspondence is placed for collection and mailing, it is deposited in the ordinary course
12 of business with the United States Postal Service in a sealed envelope with postage fully
13 prepaid.

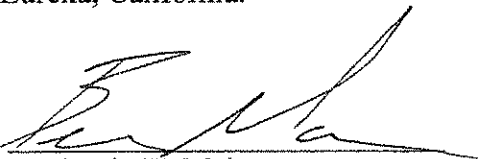
14 **BY PERSONAL SERVICE:** By hand delivering a true copy thereof to:

15 Humboldt County Clerk of the Board
16 Courthouse
17 825 5th Street, Room 111
18 Eureka, CA 95501-1153

19 **BY OVERNIGHT DELIVERY:** By placing a true copy thereof enclosed in a sealed
20 envelope addressed as shown below and depositing said envelope in a box or other facility
21 regularly maintained by the express service carrier, or delivered to an authorized courier or
22 driver authorized by the express service carrier to receive documents, in an envelope or
23 package designated by the express service carrier with delivery fees paid or provided for.

24 **BY ELECTRONIC SERVICE:** By transmitting via email a true copy thereof from
25 bmainzer@mainzerlaw.com to the email account(s) indicated below. The transmission was
26 reported as complete and without error.

27 I declare under penalty of perjury that the foregoing is true and correct, and that this
28 declaration was executed on March 19, 2024, at Eureka, California.

29 By: 
Benjamin H. Mainzer

