

Assigned for all purposes to: Stanley Mosk Courthouse, Judicial Officer: Rafael Ongkeko

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through his Guardian Ad Litem, SONIA
7 PATRICIA ROMERO

8
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF LOS ANGELES**

11
12 **J.N., a Minor, by and through his Guardian**
13 **Ad Litem, SONIA PATRICIA ROMERO**

14 Plaintiff,

15 v.

16 **COUNTY OF LOS ANGELES, a Municipal**
17 **Entity, DANNY WANG, M.D., DAVID OH,**
18 **M.D., and DOES 1 through 100, Inclusive**

19 Defendants.

CASE NO.:

20STCV23768

COMPLAINT FOR DAMAGES

GROUND FOR RELIEF:

1. Medical Battery
2. Interference with Constitutional Rights by Threat (C.C. § 52.1, *et seq.*)
3. Right to Privacy from Intrusions of Bodily Integrity (Art. I, Sec. I, Cal. Constitution)
4. Negligence
5. Right to Due Process of Bodily Integrity (42 U.S.C. § 1983)
6. Municipal and Supervisorial Liability (42 U.S.C. § 1983)

DEMAND FOR JURY TRIAL

1 **COMPLAINT FOR DAMAGES**

2 COMES NOW Plaintiff, J.N., a Minor, by and through his Guardian Ad Litem, SONIA
3 PATRICIA ROMERO, alleging this Complaint for Damages, against Defendant, COUNTY OF
4 LOS ANGELES, DANNY WANG, M.D., DAVID OH, M.D., and DOES 1 through 100, as
5 follows:
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7 **JURISDICTION AND VENUE**

8 1. Venue lies within this jurisdiction since all Defendants reside within the COUNTY
9 OF LOS ANGELES, which is also a Defendant in this Action.
10

11 2. Furthermore, the incident, which is the subject of this Action, occurred herein the
12 COUNTY OF LOS ANGELES.

13 3. Plaintiff seeks damages exceeding the amount of \$25,000.00 thereby bringing this
14 case within the Unlimited Jurisdiction of this Court.

15 4. Additionally, the relief sought by Plaintiff in this Complaint is within the jurisdiction
16 of this Court.
17

18 **COMPLIANCE WITH CLAIMS FILING PROCESS**

19 5. Plaintiff has complied with the Government Tort Claims Filing Process. The date of
20 the alleged incidents began on June 25, 2019.

21 6. On December 9, 2019, Plaintiff filed a timely Government Tort Claim with the
22 COUNTY OF LOS ANGELES.
23

24 7. On January 9, 2020, the COUNTY OF LOS ANGELES sent a Notice of Rejection to
25 Plaintiff's Counsel.
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1 13. At all relevant times, Defendants, DOES 1 through 100, were residents of the
2 COUNTY OF LOS ANGELES, and are sued in their individual capacities, as defined in the
3 present Complaint for Damages.

4 14. At all relevant times, Defendants, DOES 1 through 100, were duly appointed
5 doctors, nurses, officers, employees, or agents of Defendant, COUNTY OF LOS ANGELES,
6 subject to oversight and supervision by the COUNTY OF LOS ANGELES's elected and non-
7 elected officials.
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9 15. At this time, the true names and capacities of Defendants, DOES 1 through 100,
10 inclusive, are unknown to Plaintiff, who otherwise sues these Defendants, DOES 1 through 100,
11 by such fictitious names.
12

13 16. Plaintiff will seek leave to amend this Complaint to show the true names and
14 capacities of these Defendants, DOES 1 through 100, when they have been ascertained.
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16 **FACTS COMMON TO ALL COUNTS**

17 17. Plaintiff, J.N., a Minor, by and through his Guardian Ad Litem, SONIA PATRICIA
18 ROMERO, hereby incorporates Paragraphs 1 through 16 herein to the following allegations.

19 **The Minor was medically treated by doctors**

20 **without obtaining voluntary and informed consent**

21 18. On June 23, 2019, Plaintiff, J.N., a sixteen (16) year old, male youth, was detained,
22 in-custody, and housed, at all relevant times, by the COUNTY OF LOS ANGELES, at the
23 Eastlake Juvenile Hall.
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25 19. On June 25, 2019, the Minor, J.N., was taken, by the staff at the Eastlake Juvenile
26 Hall, to be medically examined, treated, and/or evaluated by doctors, nurses, and/or medical
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1 professionals, including Defendants, DANNY WANG, M.D., DAVID OH, M.D., and DOES 1
2 through 100, who were employed by the COUNTY OF LOS ANGELES, Juvenile Court Health
3 Services.

4
5 20. However, prior to this medical examination, treatment, and/or evaluation, neither of
6 J.N.'s parents had ever provided their voluntary and informed consent for J.N. to be medically
7 examined, treated, and/or evaluated, by doctors, nurses, and/or medical professionals, while at
8 the Eastlake Juvenile Hall.

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10 21. On this date, Defendants diagnosed the Minor, J.N., with "oppositional defiant
11 disorder," otherwise known as "ODD," which is correlated with elevated levels of testosterone
12 and delinquency in male youths.

13
14 22. On both June 25, 2019 and July 22, 2019, Defendants invasively drew, sampled,
15 took, removed, and tested the Minor's blood and urine, from his body, without obtaining his and
16 his parents' informed consent.

17
18 23. Accordingly, these blood and/or urine samples confirmed that the Minor had slightly
19 elevated levels of testosterone.

20 **The male youth was administered a female hormone, "estrogen,"**
21 **without first obtaining voluntary and informed consent**

22
23 24. Therefore, on June 25, 2019, Defendants, DANNY WANG, M.D., DAVID OH,
24 M.D., and DOES 1 through 100, prescribed Minor, J.N., thirty (30) doses of "estradiol,"
25 otherwise known as the female hormone, "estrogen," without first obtaining the voluntary or
26 informed consent of either J.N.'s parents or the Minor himself.

1 31. Furthermore, when the Minor, J.N., asked the DOE medical staff/nurse to explain the
2 medications to him, she incorrectly, falsely, and misleadingly told the Minor, J.N., that it was for
3 treating a small “nodule” on his left breast and/or chest, in order to convince him to take the
4 estrogen.
5

6 32. The concerned Minor, J.N., then told the DOE medical staff that he was going to
7 refuse the estrogen, since Defendants, DANNY WANG, M.D., DAVID OH, M.D., and DOES I
8 through 100, had never told the Minor that they were prescribing him any medication.
9

10 33. However, the DOE medical staff told the Minor, J.N., that he was not allowed to
11 refuse, decline, or reject the medication, which specifically included the female hormone,
12 “estrogen,” since it was prescribed to him by the doctors.

13 34. Furthermore, a DOE probation officer, who was standing next to the DOE medical
14 staff/nurse, also told the Minor, J.N., that he needed to take the medication.
15

16 35. Since the Minor, J.N., was currently in-custody at the Eastlake Juvenile Hall, he felt
17 coerced, forced, compelled, pressured, and threatened to take the estrogen, as he did not want to
18 receive any negative case notes, “write-ups,” repercussions, complaints, or punishments which
19 would be reported to the Judge on his pending juvenile delinquency case.
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21 36. At the time, the Minor, J.N., knew that the Juvenile Probation Department was
22 recommending a “disposition” or “sentence,” of imprisonment or placement at the Department of
23 Juvenile Justice (DJJ), which is the harshest level of punishment available for juveniles, who can
24 be held past the age of eighteen (18), and until the age of twenty-three (23) to twenty-six (26)
25 years old.
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1 37. Plaintiff also knew that the probation staff, at the Eastlake Juvenile Hall, regularly
2 take “case notes” on each Minor, which they send the Juvenile Court Judge, prior to each of the
3 minors’ Juvenile Court hearings.

4 38. These “case notes,” which are written by the probation staff at the Juvenile Hall,
5 include details about the Minor’s behavior, such as whether he is following the staff’s
6 instructions, “talking back” or arguing with staff, being disruptive, doing his homework,
7 receiving bad grades, misbehaving, or fighting.

8 39. As such, the Juvenile Court Judge indicated to Plaintiff that he would send Plaintiff
9 to “DJJ,” if he were to misbehave or receive negative “case notes,” at the Juvenile Hall, pending
10 resolution of Plaintiff’s juvenile delinquency case.

11 40. However, the Juvenile Court Judge also indicated that he would consider a less
12 severe disposition or sentence, if Plaintiff were to continue to behave and “run a good program,”
13 while at the Juvenile Hall.

14 41. Therefore, J.N. knew that he could not afford to receive even one (1) negative case
15 note, write-up, or report at the Juvenile Hall, which could result in the Judge placing him in the
16 Department of Juvenile Justice (DJJ), until he was twenty-three (23) to twenty-six (26) years old.

17 42. Consequently, the Minor, J.N., took the dosage of estrogen, as required by the DOE
18 medical and probation staff, which almost immediately caused the youth to experience negative
19 physical, emotional, cognitive, and psychological effects.

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COUNT 1

Medical Battery

**[Alleged by Plaintiff Against Defendants, DANNY WANG, M.D., DAVID OH, M.D., and
DOES 1 through 100]**

54. Plaintiff, J.N., a Minor, by and through his Guardian Ad Litem, SONIA PATRICIA ROMERO, hereby incorporates Paragraphs 1 through 53 herein to the following allegations.

55. Plaintiff claims that Defendants, DANNY WANG, M.D., DAVID OH, M.D., and DOES 1 through 100 committed a medical battery.

56. First of all, Defendants, DANNY WANG, M.D., DAVID OH, M.D., and DOES 1 through 100 performed medical examinations, treatments, and/or evaluations on Plaintiff, a Minor, when he first arrived at the Juvenile Hall, without obtaining his and/or his parents' informed consent.

57. Secondly, Defendants, DANNY WANG, M.D., DAVID OH, M.D., and DOES 1 through 100 invaded Plaintiff's body by invasively drawing, taking, testing, collecting, and sampling his blood and urine without his and/or his parents' informed consent.

58. Thirdly, Defendants, DANNY WANG, M.D., DAVID OH, M.D., and DOES 1 through 100 prescribed and administered "estrogen," three (3) vaccinations, and other possible medications to Plaintiff, a Minor, without first obtaining his and/or his parents' informed consent.

59. Additionally, Defendants, DANNY WANG, M.D., DAVID OH, M.D., and DOES 1 through 100 did not allow Plaintiff the opportunity to refuse the medications. In fact, Plaintiff was expressly told by Defendants that he was not allowed to refuse any of the medications.

1 reported to the Juvenile Court Judge and affect the disposition or sentence of his pending
2 juvenile delinquency case.

3 72. As previously mentioned, Plaintiff knew that the Probation Department was already
4 recommending to the Juvenile Court Judge that Plaintiff be sent to the Department of Juvenile
5 Justice "DJJ," which is the highest level of punishment in the juvenile court system.
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7 73. Plaintiff also knew that the probation staff, at the Eastlake Juvenile Hall, regularly
8 take "case notes" on each Minor, which they send the Juvenile Court Judge, prior to each of the
9 Minor's Juvenile Court hearings. These case notes include details regarding the Minor's
10 behavior, at the Juvenile Hall, such as whether he is following the staff's instructions, "talking
11 back" or arguing with staff, doing his homework, receiving bad grades, being disruptive, or
12 fighting with staff.
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14 74. As such, the Juvenile Court Judge indicated that he would send Plaintiff to "DJJ," if
15 he were to misbehave or receive negative "case notes," at the Juvenile Hall, pending resolution
16 of Plaintiff's juvenile delinquency case.
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18 75. However, the Juvenile Court Judge also indicated that he would consider a less
19 severe disposition or sentence, if Plaintiff were to continue to behave and "run a good program,"
20 while at the Juvenile Hall.
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22 76. Therefore, when the DOE nurse and DOE probation officer told Plaintiff that he was
23 not allowed to refuse the "estrogen," Plaintiff felt threatened, intimidated, and coerced into
24 taking the medication, as he did not want to receive any negative write-ups, for refusing to take
25 the estrogen as ordered by the medical staff and probation.
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1 77. Accordingly, Defendants' nonviolent threats of severe consequences caused Plaintiff
2 to reasonably believe that if he exercised his right to privacy, bodily integrity, and due process,
3 by refusing to take the estrogen, Defendants would take actions of severe consequences against
4 him, which Defendants had the apparent ability to carry-out, which would lead to a harsher
5 punishment in his pending juvenile delinquency case.
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7 78. Plaintiff was harmed by Defendants' nonviolent threats of severe consequences since
8 he was forced to take the estrogen which caused him to develop gynocomastia (i.e., female breast
9 tissue). He also experienced symptoms of depression, anxiety, acne and pimples, sleep
10 disorders, embarrassment, humiliation, lower self-esteem, and fear for his health and well-being.
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12 79. Defendants' nonviolent threats of severe consequences were a substantial factor in
13 causing the foregoing harms, damages, and injuries since Plaintiff was threatened, intimidated,
14 and/or coerced into taking the estrogen and experienced immediate symptoms upon taking the
15 medication.
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17 80. Plaintiff seeks general and special damages along with reasonable attorney fees and
18 costs pursuant to California Civil Code section 52.1, *et seq.*
19

20 **COUNT 3**

21 **California Constitution, Art. I, Sec. I – Right to Privacy in Bodily Integrity**

22 **[Alleged by Plaintiff Against Defendants, DANNY WANG, M.D., DAVID OH, M.D., and**
23 **DOES 1 through 100]**

24 81. Plaintiff, J.N., a Minor, by and through his Guardian Ad Litem, SONIA PATRICIA
25 ROMERO, hereby incorporates Paragraphs 1 through 80 herein to the following allegations.
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1 82. Plaintiff alleges that Art. I, Sec. I, of the California Constitution provides him with
2 the constitutional right to make personal decisions or to conduct personal activities free of
3 interference, observation, or intrusion.
4

5 83. Plaintiff further alleges that this Right to Privacy, under Art. I, Sec. I, of the
6 California Constitution, broadly guarantees the freedom to choose to reject, or refuse to consent
7 to, intrusion of his or her bodily integrity, which encompasses the right to refuse unwanted
8 medication.
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10 84. Additionally, Plaintiff alleges that he has a reasonable expectation of privacy to
11 choose to reject, or refuse to consent to, unwanted medication, while detained and in-custody, as
12 set forth by the written policies, practices, and procedures of the Juvenile Hall and the Board of
13 State and Community Corrections, which expressly provide Plaintiff with the right, ability, and
14 freedom to refuse non-emergency medication.
15

16 85. Plaintiff further alleges that he has a reasonable expectation of privacy to choose to
17 reject, or refuse to consent to, unwanted medication, while detained and in-custody at the
18 Juvenile Hall, since it was not medically appropriate to require Plaintiff to take estrogen;
19 Plaintiff was not a danger to himself or others; Plaintiff was not suffering any psychotic
20 symptoms nor was the medication intended to treat such symptomologies; and it was not in
21 Plaintiff's medical interests to take estrogen.
22

23 86. Plaintiff further alleges that he has a reasonable expectation of privacy to choose to
24 reject, or refuse to consent to, unwanted medication, while detained and in-custody, since it is
25 well-known, accepted, followed, and established, in the State of California, that Defendants were
26 not allowed to enter or invade Plaintiff's body; force any objects into his body; cause
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1 physiological changes to his appearance; change his bodily chemistry and hormones; alter his
2 psychological functioning; nor medically treat him in any manner without obtaining the
3 appropriate consent.

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5 87. The Defendants' conduct constituted a serious invasion of privacy since it further
6 violated the norms, customs, policies, procedures, and practices of a reasonable juvenile hall,
7 county jail, or state prison, in the State of California, by invading, entering, and altering
8 Plaintiff's body, without his consent.

9
10 88. Defendants intentionally intruded on Plaintiff's freedom of bodily integrity, which
11 encompasses the right to refuse unwanted medication, when they forced Plaintiff to take the
12 estrogen, by making non-violent threats of serious consequences (i.e., reporting him to the
13 Juvenile Court Judge who would send him to DJJ or prison for youths until he was twenty-three
14 (23) to twenty-four (24) years old).

15
16 89. Defendants' actions would be highly offensive to a reasonable person since every
17 person is guaranteed the freedom to choose to reject, or refuse to consent to, intrusion of his or
18 her bodily integrity, which encompasses the right to refuse unwanted medication. This right
19 further extends to persons who are detained, in-custody, and incarcerated at juvenile halls,
20 county jails, and state prisons throughout the State of California and is formalized in their written
21 policies and further set forth in various judicial decisions, opinions, and case law.

22
23 90. Plaintiff was harmed by the administration of the estrogen since he developed
24 gynecomastia (i.e., female breast tissue), fear, depression, anxiety, sleep disorders, acne,
25 pimples, low-confidence, embarrassment, ridicule, and humiliation, all of which he will need
26 medical treatment and intervention to address.

1 102. Plaintiff alleges that he had a liberty interest in bodily integrity which is one of the
2 personal rights accorded substantive protection under the Due Process Clause of the Fourteenth
3 Amendment to the Constitution of the United States.
4

5 103. Defendants prescribed and forcibly administered estrogen to Plaintiff, a male youth
6 who was detained at the Eastlake Juvenile Hall, without obtaining his and his parents' informed
7 consent.
8

9 104. Defendants prescribed and forcibly administered the estrogen to Plaintiff, a male
10 youth who was detained at the Eastlake Juvenile Hall, without allowing him to refuse the
11 medication, which he had attempted to do.
12

13 105. Defendants told Plaintiff that he was not allowed to refuse the estrogen thereby
14 causing Plaintiff to believe that Defendants would take actions of serious consequences against
15 him (i.e., causing him to be sent to the Department of Juvenile Justice which is the harshest level
16 of punishment for a juvenile), unless he allowed Defendants to invade his body and physically,
17 psychologically, emotionally, chemically, and hormonally alter him.
18

19 106. At the time that Plaintiff received this medical treatment, he did not have a serious
20 mental illness; Plaintiff was not a danger to himself or others; the treatment was not in Plaintiff's
21 medical interests; and Plaintiff was not being prescribed any anti-psychotic medications.
22

23 107. Furthermore, under the circumstances, there was no overriding justification for
24 prescribing estrogen to Plaintiff nor was there any determination of its medical appropriateness.
25

26 108. While Defendants determined that Plaintiff had "oppositional defiant disorder,"
27 which is associated with higher levels of testosterone and delinquency, there is no medical
28 evidence to support administering estrogen to a male youth, in order to treat ODD.

1 109. As such, any administration of estrogen to Plaintiff would be considered an
2 experimental treatment and without any support from the medical community.

3 110. Defendants consciously or through complete indifference disregarded the risk of
4 violating Plaintiff's right to bodily integrity, by entering, altering, treating, invading, testing,
5 sampling, and changing his body, without first obtaining his and his parents' informed consent.
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7 111. Defendants further consciously or through complete indifference disregarded the
8 risk of violating Plaintiff's right to bodily integrity, when they did not allow Plaintiff to refuse to
9 take the estrogen, thereby causing him to feel that they would take actions leading to serious
10 consequences against him.
11

12 112. Defendants further consciously or through complete indifference disregarded the
13 risk of violating Plaintiff's right to bodily integrity, when they administered an experimental
14 treatment to Plaintiff, without obtaining his informed consent, for which he ultimately suffered
15 complications, side effects, injuries, and damages.
16

17 113. Defendants did not have any justifiable government interest in medically treating
18 Plaintiff without his or his parents' informed consent; forcibly administering a female hormone,
19 "estrogen," to this male youth; preventing Plaintiff from refusing to take the estrogen;
20 administering an experimental medical treatment that is lacking in any medical basis or support;
21 and by entering and altering Plaintiff's body without his consent to do so.
22

23 114. Plaintiff was harmed by the prescription and administration of the estrogen, which
24 was a substantial factor in causing his injuries, since he immediately developed gynecomastia
25 (i.e., female breast tissue), fear, depression, anxiety, sleep disorders, acne, pimples, low-
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1 confidence, embarrassment, ridicule, and humiliation, all of which he will need medical
2 treatment and intervention to address.

3 115. Accordingly, Plaintiff seeks general and special damages along with reasonable
4 attorney fees and costs pursuant to 42 U.S.C. § 1988.
5

6 **COUNT 6**

7 **42 U.S.C. § 1983 – Municipal and Supervisorial Liability**

8 **[Alleged by Plaintiff Against Defendants, COUNTY OF LOS ANGELES, and DOES 1**
9 **through 100]**

10 116. Plaintiff, J.N., a Minor, by and through his Guardian Ad Litem, SONIA PATRICIA
11 ROMERO, hereby incorporates Paragraphs 1 through 115 herein to the following allegations.
12

13 117. Plaintiff alleges that the express policies and/or widespread and/or longstanding
14 customs and practices of Defendant, COUNTY OF LOS ANGELES, actually and proximately
15 caused Plaintiff's damages, including but not limited to, the deprivation of his Fourteenth
16 Amendment Right to Due Process, when Defendants medically treated, tested, assessed,
17 sampled, entered, invaded, and evaluated Plaintiff, without properly obtaining informed consent,
18 which led to his damages and injuries.
19

20 118. Particularly, Plaintiff's Fourteenth Amendment Right to Due Process was violated
21 when Defendants medically treated, assessed, and evaluated Plaintiff without first obtaining
22 informed consent when he first arrived at the Juvenile Hall.
23

24 119. Plaintiff's Fourteenth Amendment Rights were further violated when Defendants
25 invasively entered, tested, drew, sampled, and took blood and urine samples from Plaintiff,
26 without first obtaining his or his parents' informed consent.
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1 120. Plaintiff's Fourteenth Amendment Right to Due Process was further violated when
2 Defendants administered several medications to Plaintiff, including "estrogen" and three (3)
3 vaccinations, without obtaining his informed consent or medical history.
4

5 121. These rights were further violated when he attempted to refuse the estrogen but was
6 told by Defendants that he was not allowed to refuse it. These Defendants also caused Plaintiff
7 to believe that his continued refusal would lead to serious consequences at the Juvenile Hall.

8 122. This estrogen was given to Plaintiff as an experimental treatment for oppositional
9 defiant disorder which is associated with higher levels of testosterone and delinquency.
10 However, there is no medical evidence to support the validity of giving minors estrogen as a
11 treatment for ODD.
12

13 123. Additionally, Defendants continued to medically treat Plaintiff without obtaining
14 sufficient, valid, and required informed consent from the Minor or his parents who were
15 continuously never told the specific medical procedures that were being performed on their son.
16

17 124. These tortious actions that led to the violation of Plaintiff's Right to Due Process
18 under the Fourteenth Amendment were caused by the unconstitutional practices, customs, and
19 policies and deficient training of employees of the COUNTY OF LOS ANGELES.

20 125. The COUNTY OF LOS ANGELES is aware that prior to treating a Minor at the
21 Juvenile Hall they need to first obtain informed consent. However, despite knowing that medical
22 doctors, nurses, and professionals must first obtain informed consent prior to medically treating
23 youths at the Juvenile Hall, by maintaining the following practices, customs, and policies, the
24 COUNTY OF LOS ANGELES remains deliberately indifferent to the constitutional rights of its
25 detained, in-custody youths.
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1 126. First of all, the COUNTY OF LOS ANGELES will medically treat Minors, at the
2 Juvenile Hall, when they are first detained and brought into custody, without properly obtaining
3 informed consent of the Minor, parents, and/or legal guardians.
4

5 127. These practices, customs, and policies have led to medications being administered
6 the youths; invasive testing being conducted including blood draws, x-rays, and injections;
7 altering hormonal and body chemistry that may have physical and psychological effects; invasive
8 dental procedures being performed; and potential surgery related procedures.
9

10 128. Secondly, the COUNTY OF LOS ANGELES maintains the practice, custom, and
11 policy of treating Minors while relying on a vague, overbroad, unparticular, unspecific, and
12 boilerplate informed consent "form" that does not provide sufficient information to provide
13 voluntary consent.

14 129. Specifically, the informed consent form does not inform the Minor, parents, and/or
15 legal guardians of the nature, risks, problems, benefits, procedure, complications, necessity, and
16 options of any particular medical treatment.
17

18 130. Since the foregoing informed consent form does not provide the necessary
19 information to obtain voluntary and informed consent from the Minor, parents, and/or legal
20 guardians, this practice, custom, and policy is systemically leading to violations of the Right to
21 Due Process under the Fourteenth Amendment whereby doctors, nurses, and medical
22 professionals are treating Minors without actually obtaining their consent to do so.
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24 131. Therefore, even in the event that a Minor and his or her parents or legal guardians
25 sign a boilerplate informed consent "form," at the Juvenile Hall, it does not provide sufficient
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Date: 6/23/20

Respectfully submitted,

THE OUCHI LAW FIRM, A.P.C.



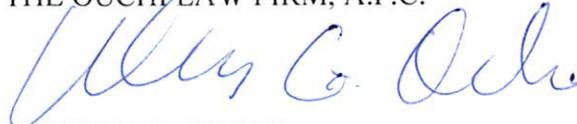
WESLEY G. OUCHI
Attorney for Plaintiff,
J.N., a Minor, by and through his Guardian Ad
Litem, SONIA PATRICIA ROMERO

DEMAND FOR JURY TRIAL

Plaintiff, J.N., a Minor, by and through his Guardian Ad Litem, SONIA PATRICIA ROMERO, hereby respectfully demands a trial by jury in this matter.

Respectfully submitted,

THE OUCHI LAW FIRM, A.P.C.



WESLEY G. OUCHI

Attorney for Plaintiff,
J.N., a Minor, by and through his Guardian Ad Litem, SONIA PATRICIA ROMERO

Date: 6/23/20

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