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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF CONTRA COSTA-UNLIMITED JURISDICTION

18	JEFFERY HUMBLE, individually and as)	Case No.:
19	Guardian ad Litem for JAMANI HUMBLE,)	(UNLIMITED JURISDICTION)
20	a minor;)	
21)	COMPLAINT FOR
22	Plaintiffs,)	DAMAGES BASED UPON THE
23)	CAUSE OF ACTION OF:
24	vs.)	
25	CITY OF HERCULES; JOSEPH)	
26	VASQUEZ; CONTRA COSTA COUNTY;)	1. Wrongful Death
27	and DOES 1-50, inclusive,)	2. Personal Injury
28)	3. Negligent Infliction of
	Defendants.)	Emotional Distress
)	
)	DEMAND FOR JURY TRIAL
)	

1 Plaintiffs allege as follows:
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3 1. This state tort action seeks compensatory damages for the wrongful deaths of Ryniqueka
4 Dowell and Jamari Humble (“Decedents”), resulting from a reckless and unreasonable vehicular
5 pursuit initiated and conducted by on-duty officers of the Hercules Police Department (“HPD”) and
6 Contra Costa County Sherriff’s Office (“CCSO”). In the early evening hours of March 23, 2024,
7 on-duty officers with CCSO notified HPD of a vehicle which was believed to have been stolen
8 entering the City of Hercules. An unknown on-duty HPD officer decided to instigate a high-speed
9 pursuit of the vehicle into densely populated residential areas and through multiple intersections and
10 stop lights when the suspect’s vehicle collided with another vehicle carrying Decedent Ryniqueka
11 Dowell and her two six-year-old twin sons, Decedent Jamari Humble and Plaintiff JAMANI
12 HUMBLE. Decedent Ryniqueka Dowell passed away at the scene, Decedent Jamari Humble died
13 from his collision-related injuries approximately four days later, and Plaintiff JAMANI HUMBLE
14 sustained serious but non-fatal injuries.

15 2. As a direct and foreseeable consequence of HPD and CCSO’s reckless pursuit, a collision
16 occurred resulting in the deaths of Decedents and injury to Plaintiff JAMANI HUMBLE. The pursuit
17 and subsequent actions by the officers represent not only negligence and violations of departmental
18 policy but also show negligent training, hiring, and supervision by the CITY OF HERCULES
19 (“CITY”), HPD Chief of Police JOSEPH VASQUEZ (“VASQUEZ”), CONTRA COSTA COUNTY
20 (“COUNTY”), and supervisor Defendants, DOES 1-50.

21 3. This action seeks redress for injuries suffered by Plaintiff JAMANI HUMBLE from the
22 collision and the damages suffered by both Plaintiffs from the death of the Decedents. Specifically,
23 Plaintiffs seek compensatory damages for past and future financial losses, including but not limited
24 to loss of income, loss of future earning capacity, and loss of financial support. Additionally, this
25 action seeks compensation for past and future medical expenses incurred, funeral and burial costs,
26 and the value of household services that the Decedents would have provided. Plaintiffs further seek
27 damages for non-economic losses such as emotional distress, loss of consortium, loss of
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1 companionship, loss of guidance and emotional support, and loss of enjoyment of life. Plaintiffs
2 also seek survival damages for pre-death pain and suffering experienced by the Decedents. This
3 action further seeks litigation costs and any other forms of relief that the court deems just and
4 appropriate.

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6 **PARTIES**

7 4. At all times mentioned herein, Plaintiff JEFFERY HUMBLE, was the spouse of Decedent
8 Ryniqueka Dowell, the biological father of Decedent Jamari Humble, and biological father of
9 Plaintiff JAMANI HUMBLE. Plaintiff JEFFERY HUMBLE is an individual residing in the County
10 of Sacramento. JEFFERY HUMBLE brings this action individually for Wrongful Death and as
11 successor-in-interest to the estate of Decedents. Plaintiffs JEFFERY HUMBLE and JAMARI
12 HUMBLE are Decedent's successors-in-interest pursuant to California Code of Civil Procedure
13 §§377.30 and 377.60.

14 5. At all times mentioned herein Plaintiff JAMANI HUMBLE was the biological son of
15 Decedent Ryniqueka Dowell and Plaintiff JEFFERY HUMBLE, as well as the biological brother of
16 Decedent Jamari Humble. Plaintiff JAMANI HUMBLE is an individual residing in the County of
17 Sacramento. JAMANI HUMBLE brings this action individually for personal injury, as well as for
18 Wrongful Death and as successor-in-interest to the estate of Decedent Ryniqueka Dowell. Plaintiff
19 JAMANI HUMBLE is Decedent Ryniqueka Dowell's successor-in-interest pursuant to California
20 Code of Civil Procedure §§377.30 and 377.60.

21 6. At all relevant times, Defendant CITY OF HERCULES ("CITY") is and was a duly
22 organized public entity existing under the laws of the State of California. CITY is responsible for
23 the actions, omissions, policies, procedures, practices, and customs of its various agents and
24 agencies, including the Hercules Police Department ("HPD") and its agents and employees. At all
25 relevant times, Defendant CITY was responsible for assuring that the actions, omissions, policies,
26 procedures, practices, and customs of the HPD and its employees and agents complied with the laws
27 of the United States and of the State of California. At all relevant times, the CITY was the employer
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1 all involved HPD officers including, but not limited to, the HPD officer who initiated the pursuit,
2 Defendant HPD Chief of Police JOSEPH VASQUEZ, and DOES 1-50.

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4 7. At all relevant times, the HPD officer who initiated the pursuit was a police officer
5 working for the HPD, was employed by the CITY, and was acting under color of law within the
6 course and scope of that employment with the HPD and was also acting within the complete authority
7 and ratification of their principal, Defendant CITY. The name of the officer who initiated to pursuit
8 is unknown to Plaintiff at this time and is hereafter referred to under the fictitious name “JOHN
9 DOE.”

10 8. At all relevant times, Defendant JOSEPH VASQUEZ (“VASQUEZ”) at all material times
11 was the Chief of Police for HPD and was acting within the course and scope of that employment. In
12 that capacity, Defendant VASQUEZ was a policy making officer for Defendant CITY OF
13 HERCULES.

14 9. At all relevant times, Defendant CONTRA COSTA COUNTY (“COUNTY”) is and was
15 a duly organized public entity existing under the laws of the State of California. COUNTY is
16 responsible for the actions, omissions, policies, procedures, practices, and customs of its various
17 agents and agencies, including the Contra Costa County Sherriff’s Office (“CCSO”) and its agents
18 and employees. At all relevant times, Defendant COUNTY was responsible for assuring that the
19 actions, omissions, policies, procedures, practices, and customs of the CCSO and its employees and
20 agents complied with the laws of the United States and of the State of California. At all relevant
21 times, the COUNTY was the employer all involved CCSO officers.

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23 10. At all relevant times, DOES 1-50 (“SUPERVISORY DOES”), who are supervisory,
24 managerial, and policymaking employees working for the HPD and CCSO, were employed by the
25 CITY and COUNTY. At all relevant times, SUPERVISORY DOES were acting under color of law
26 within the course and scope of their duties as supervisory, managerial, and policymaking employees
27 working for the HPD and CCSO and the CITY and COUNTY and were acting with the complete
28 authority and ratification of their principal, Defendants CITY and COUNTY.

1 17. At or around said date and time, Defendant HPD Officer JOHN DOE saw the Mazda
2 exit at Willow Avenue in the City of Hercules and attempted to pull behind the vehicle when the
3 Mazda started to speed away.
4

5 18. HPD officer JOHN DOE initiated a high-speed pursuit of the Mazda northbound on
6 Willow Avenue which changes into Parker Avenue as it approaches the neighboring City of Rodeo.
7 Officer JOHN DOE and multiple other HPD officers continued the high-speed pursuit through
8 densely populated residential areas as well as through multiple intersections and stop lights. The
9 high-speed chase went into the neighboring City of Rodeo until the Mazda ran a red light into the
10 intersection of Parker Avenue and Fourth Street. When the Mazda sped into the intersection it
11 collided with a vehicle lawfully traveling through the intersection which was carrying Decedents and
12 Plaintiff JAMANI HUMBLE.

13 19. Decedent Ryniqueka Dowell was pronounced dead at the scene, Decedent Jamari
14 Humble was taken to a nearby hospital where he succumbed to his collision-related injuries
15 approximately four days later. Plaintiff JAMANI HUMBLE sustained significant injuries during the
16 collision but survived.

17 20. At the time of initiating the pursuit, there was no compelling need for immediate
18 apprehension of Mazda or it's driver. HPD Officers had the Mazda's license plate number and could
19 have tracked the vehicle down at a later time instead of continuing their pursuit at reckless and unsafe
20 speeds on populated city streets.
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22 21. HPD Officer JOHN DOE and other HPD officers involved in the vehicle pursuit violated
23 HPD's policies and California Vehicle Code § 17004.7 during their pursuit.

24 22. HPD's policies relating to vehicular pursuits were deficient in numerous respects,
25 including but not limited to, the failure to provide adequate guidelines for initiating pursuits,
26 determining the number of vehicles involved, setting forth driving tactics, and establishing criteria
27 for terminating a pursuit.
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1 23. Furthermore, HPD failed to provide regular and periodic training to its officers,
2 including HPD Officer JOHN DOE and the other HPD officers involved, pursuant to California
3 Vehicle Code § 17004.7(d).
4

5 23. At all relevant times, HPD Officer JOHN DOE and all other HPD officers involved in
6 the subject pursuit were acting under the color of state law and were within the scope and course of
7 their employment with the CITY OF HERCULES (“CITY”).

8 24. As a direct and foreseeable consequence of the Officers’ reckless and unreasonable
9 pursuit, a collision occurred, causing the deaths of Decedents and injury to Plaintiff JAMANI
10 HUMBLE. The actions and decisions made by HPD officers not only violated departmental policies
11 but also reflect negligent training, hiring, and supervision by the CITY and DOES 1-50.

12 26. Plaintiffs repeat and reallege each and every allegation of this Complaint with the same
13 force and effect as if fully set forth herein.
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15 27. On or around March 23, 2024, at approximately 7:30 p.m., unknown CCSO officers
16 alerted HPD officers that a reportedly stolen 2021 Mazda SUV was headed east on Interstate 80
17 toward the City of Hercules.

18 28. At or around said date and time, Defendant HPD Officers saw the Mazda exit at Willow
19 Avenue in the City of Hercules and attempted to pull behind the vehicle when the Mazda started to
20 speed away.

21 29. Defendant HPD officers initiated a high-speed pursuit of the Mazda northbound on
22 Willow Avenue which changes into Parker Avenue as it approaches the neighboring City of Rodeo.
23 The high-speed pursuit went through a densely populated residential area and multiple intersections
24 and stop lights. The high-speed chase went into the neighboring City of Rodeo until the Mazda ran
25 a red light into an intersection and collided with a vehicle carrying Decedents and Plaintiff JAMANI
26 HUMBLE.
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1 30. Decedent Ryniqueka Dowell was pronounced dead at the scene, Decedent Jamari
2 Humble was taken to a nearby hospital where he succumbed to his collision-related injuries
3 approximately four days later, and Plaintiff JAMANI HUMBLE sustained non-fatal injuries.
4

5 31. At the time of initiating the pursuit, there was no compelling need for immediate
6 apprehension of the Mazda or it's driver. HPD Officers had the Mazda's license plate number and
7 could have tracked him down at a later time instead of continuing their pursuit at reckless and unsafe
8 speeds on populated city streets.

9 32. As a direct and foreseeable consequence of the HPD Officers' reckless and unreasonable
10 pursuit, a collision occurred, causing the immediate deaths of Decedents and injury to Plaintiff
11 JAMANI HUMBLE. The actions and decisions made by HPD Officers not only violated
12 departmental policies but also reflect negligent training, hiring, and supervision by the CITY and
13 DOES 1-50.

14 33. At all times relevant hereto, California *Government Code* §815.2 was in full force and
15 effect. Such sections read:

16 **815.2 – Injuries by employee within scope of employment; immunity of employee.**

17 (a) A public entity is liable for injury proximately caused by an act or omission of an
18 employee of the public entity within the scope of his employment if the act or omission
19 would, apart from this section, have given rise to a cause of action against that employee or
20 his personal representative.

21 34. At all times relevant hereto, California *Vehicle Code* § 17001 was in full force and effect.
22 Such section reads:

23 **17001 – Liability of public entity.**

24 A public entity is liable for death or injury to person or property proximately caused by a
25 negligent or wrongful act or omission in the operation of any motor vehicle by an employee
26 of the public entity acting within the scope of his employment.

27 35. At the time of this incident, HPD Officer JOHN DOE and DOES 1-50 were acting within
28 the course and scope of employment with Defendant CITY and its police department.

1 36. HPD Officer JOHN DOE had a duty to operate the police vehicle safely so as not to
2 negligently cause vehicle collisions and/or injuries to people such as Decedents and Plaintiff
3 JAMANI HUMBLE.

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5 37. Defendant CITY was the registered owner of the police vehicle that HPD Officer JOHN
6 DOE and other pursuing HPD officers were driving when Decedents and Plaintiff JAMANI
7 HUMBLE were struck, and the CITY authorized and consented to the use of the vehicle.

8 38. Defendants CITY, HPD Chief of Police JOSEPH VASQUEZ, HPD Officer JOHN DOE,
9 and DOES 1-50, inclusive, bear liability and legal responsibility to the Plaintiffs for the deaths of
10 Decedents and injury to Plaintiff JAMANI HUMBLE in accordance with California Government
11 Code section 815.2 and California Vehicle Code section 17001.

12 39. The actions and inactions of Defendants were negligent and reckless, including but not
13 limited to:

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15 a) HPD Officer JOHN DOE's negligent operation of the police vehicle;
- 16 b) the failure of the CITY, HPD Chief of Police JOSEPH VASQUEZ, and
17 SUPERVISORY DOES to properly train and supervise HPD Officers with
18 respect to proper operation of a patrol vehicle;
- 19 c) the CITY's, HPD Chief of Police JOSEPH VASQUEZ's, and SUPERVISORY
20 DOES' negligent retention of HPD Officer JOHN DOE.

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22 40. As a direct and proximate result of Defendants' conduct as alleged above, and other
23 undiscovered negligent conduct, Plaintiffs suffered damages as set forth herein.

24 41. The CITY is vicariously liable for the acts of HPD Officer JOHN DOE and other
25 involved HPD officers involved in the subject pursuit pursuant to section 815.2(a) of the California
26 Government Code, which provides that a public entity is liable for the injuries caused by its
27 employees within the scope of the employment if the employee's act would subject him or her to
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1 liability. Pursuant to section 820(a) of the California Government Code, a public employee is liable
2 for injury caused by his act or omission to the same extent as a private person.
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4 42. In addition, government entity defendants are liable and do not enjoy immunity under
5 Vehicle Code sections 17001 and 21055, arising from the incident, as follows: Under Vehicle Code
6 section 17001, a public entity may be held liable for personal injuries arising from its employee's
7 operation of a motor vehicle. *See Veh. Code §§ 17001-17004; Brummett v. Cnty. of Sacramento*, 21
8 Cal. 3d 880, 885, 582 P.2d 952, 955 (1978). However, Vehicle Code section 21055 does provide
9 for exemptions from the vehicle code for officers responding to emergency calls who meet certain
10 criteria (i.e., among others, vehicle driven in response to an emergency call and driver sounding his
11 siren with red lamp visible from the front). In this case, upon information and belief, Plaintiffs allege
12 that HPD Officer JOHN DOE and other HPD officers involved in the pursuit were not responding
13 to an "emergency call" as the crime at issue was minor and the officers had already obtained the
14 vehicle's license plate number, so they could have easily tracked him down later.

15 43. "Section 21055 does not relieve the driver of a vehicle from the duty to drive with due
16 regard for the safety of all persons using the highway, nor protect him from the consequences of an
17 arbitrary exercise of the privileges granted in that section." Veh. Code § 21056. Further, Veh. Code
18 section 21807 reiterates that emergency personnel are not exempt from the duty to drive with due
19 regard for the safety of all persons and property. In other words, merely proceeding to an emergency
20 call does not as a matter of law preclude a finding of liability on the part of the law enforcement
21 agency for the actions of its employee-driver.

22 44. Even when an officer responds to an emergency call "Code 3" with lights and sirens, the
23 officer must still use due care taking into account traffic conditions and the emergency situation to
24 which the officer is responding. *Torres v. City of Los Angeles*, 58 Cal. 2d 35, 51, 372 P.2d 906, 916
25 (1962) ("The question to be asked is what would a reasonable, prudent emergency driver do under
26 all of the circumstances, including that of emergency."). Whether or not a driver has fulfilled this
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1 duty of care imputed by Vehicle Code § 21056 is a factual question to be answered by a jury.
2 *Brummett*, 21 Cal. at 887, 582 P.2d at 956.

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4 45. HPD did not adopt and promulgate a written policy on, and provide regular and periodic
5 training on an annual basis for vehicular pursuits complying with California Vehicle Code Section
6 17004.7 (c) and (d) and is thus not protected by the Vehicle Code Section 17004.7 immunity.

7 46. Further, The HPD's vehicle pursuit policies were deficient and in violation of California
8 Vehicle Code § 17004.7.

9 46. The policy failed to adequately specify when it is appropriate to initiate a vehicular
10 pursuit.

11 47. The policy lacked clear procedures to be followed by officers during a vehicular pursuit.

12 48. The policy did not adequately define the role of a supervising officer in managing and
13 controlling a pursuit.
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15 49. The policy failed to adequately establish driving tactics and specify under what
16 circumstances these tactics might be appropriate.
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18 50. The policy did not outline sufficient and adequate factors for officers and supervisors to
19 consider when determining pursuit speeds.

20 51. The policy lacked sufficient guidelines on the role of air support during a pursuit.

21 52. The policy failed to clearly instruct officers about when to terminate or discontinue a
22 pursuit and did not provide adequate criteria for evaluating risk factors including public safety, traffic
23 conditions, weather, and availability of air support.
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25 53. HPD officers are not sufficiently trained on a consistent yearly basis regarding HPD
26 vehicle pursuit policies.
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1 55. This action seeks redress for injuries suffered by Plaintiff JAMANI HUMBLE during
2 the collision and for the damages suffered by both Plaintiffs from the loss of Decedents. Specifically,
3 Plaintiffs seek compensatory damages for past and future financial losses, including but not limited
4 to loss of income, loss of future earning capacity, and loss of financial support. Additionally, this
5 action seeks compensation for past and future medical expenses incurred, funeral and burial costs,
6 and the value of household services that the Decedents would have provided. Plaintiffs further seek
7 damages for non-economic losses such as emotional distress, loss of consortium, loss of
8 companionship, loss of guidance and emotional support, and loss of enjoyment of life. Plaintiffs
9 also seek survival damages for pre-death pain and suffering experienced by the Decedents. This
10 action further seeks litigation costs and any other forms of relief that the court deems just and
11 appropriate.

12 **FIRST CAUSE OF ACTION FOR WRONGFUL DEATH BY ALL PLAINTIFFS**
13 **AGAINST ALL DEFENDANTS**

14 56. Plaintiffs repeat and reallege each and every allegation of this Complaint with the same
15 force and effect as if fully set forth herein.

16 13. As a legal result of the actions of defendants, and each them, as aforesaid, and the
17 described collision, decedents were killed.

18 14. As a result of the death of decedents, the plaintiffs lost and will continue to lose in
19 the future the loss of love, society, care, comfort, affection, companionship, solace and moral
20 support and more all within the jurisdictional limits of this court. Said losses will continue into the
21 future. In addition, plaintiff JEFFREY HUMBLE lost and will continue to lose consortium
22 damages.

23 15. As a further legal result of the negligence of defendants, and each of them, as
24 aforesaid, plaintiffs have lost and will continue to lose in the future economic support and
25 financial contributions that, but for her unnecessary death, RYNIQUEKA DOWELL would have
26 made to the plaintiffs.

27 16. As a further legal result of the death of RYNIQUEKA DOWELL, plaintiffs have
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1 lost and will continue to lose in the future services that, but for her unnecessary death,
2 RYNIQUEKA DOWELL would have provided each of the plaintiffs.

3 17. As a further legal result of the death of decedents, plaintiffs incurred the cost of
4 burial, including funeral expenses.

5 WHEREFORE, Plaintiffs prays for judgment as follows:

6 **SECOND CAUSE OF ACTION FOR PERSONAL INJURIES BY JEFFREY**
7 **HUMBLE, AS GUARDIAN AD LITEM FOR JAMANI HUMBLE A MINOR AGAINST**
8 **ALL DEFENDANTS.**

9 56. Plaintiffs repeat and reallege each and every allegation of this Complaint with the same
10 force and effect as if fully set forth herein.

11 7. As a legal result of the actions of defendants, and each of them, Plaintiff JAMANI HUMBLE,
12 a minor and was hurt and injured in her health, strength and activity, sustaining shock and injury to
13 her nervous system and person, all of which said injuries have caused and continue to cause her great
14 mental, physical and nervous pain and suffering. Plaintiff is informed and believes and based thereon
15 allege that said injuries will be permanent in nature, all to her general damage within the
16 jurisdictional limits of this court.

17 8. As a further legal result of the negligence of defendants, and each of them, as
18 aforesaid, Plaintiff JAMANI HUMBLE, a minor, has required medical treatment and will continue
19 to require medical treatment in the future. Medical and incidental expenses have been incurred and
20 will continue to be incurred on Plaintiff's behalf. The exact amount of those expenses unknown now
21 but Plaintiff JAMANI HUMBLE, a minor prays leave to amend her complaint to allege the exact
22 amount when the same is ascertained.

23 9. As a further legal result of the negligence of defendants, and each of them, as aforesaid,
24 Plaintiff, has lost and will continue to lose in the future earnings and/or the capacity to earn income.
25 The exact amount of these losses is unknown now, but Plaintiff JAMANI HUMBLE, a minor prays
26 leave to amend her complaint to allege the exact amount when the same is ascertained.

27 WHEREFORE, Plaintiff pray for judgment as hereinafter set forth:

1 Plaintiffs further seek damages for non-economic losses such as emotional distress, loss of
2 consortium, loss of companionship, loss of guidance and emotional support, and loss of enjoyment
3 of life. Plaintiffs also seek survival damages for pre-death pain and suffering experienced by the
4 Decedents. This action further seeks litigation costs and any other forms of relief that the court
5 deems just and appropriate.

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7 **PRAYER FOR RELIEF**

8 WHEREFORE, Plaintiffs prays for judgment against all Defendants and DOES 1-50 as
9 follows:

10 a. For past and future non-economic damages suffered by Plaintiff JAMANI HUMBLE as a
11 result of the collision as well as the non-economic damages suffered by both Plaintiffs from the loss
12 of Decedents which include, but are not limited to, loss of love, affection, care, society, service,
13 comfort, support, right to support, companionship, solace or moral support, expectations of future
14 support and counseling, as well as other benefits and assistance.

15
16 b. For survival damages for pre-death pain and suffering and loss of life experienced by the
17 Decedents.

18 c. For past and future economic damages suffered by these Plaintiffs related to loss of
19 earnings and loss of financial support.

20 d. For funeral and burial expenses suffered by these Plaintiffs according to proof.

21
22 e. For past and future hospital, medical, professional, and incidental expenses incurred by
23 Plaintiffs and Decedents' estate as a result of this incident.

24 f. For past and future loss of income and earning capacity suffered by Plaintiffs as a result
25 of this incident and according to proof.

26 g. For prejudgment interest, according to proof.

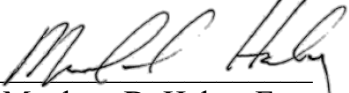
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28 h. For pre-trial interest, according to proof.

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i. For damages caused to these Plaintiffs' other economic losses, according to proof.

Dated: May 7, 2024

THE HALEY LAW OFFICES. P.C.

By: 
Matthew D. Haley, Esq.
Michael C. Haley, Esq.
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