

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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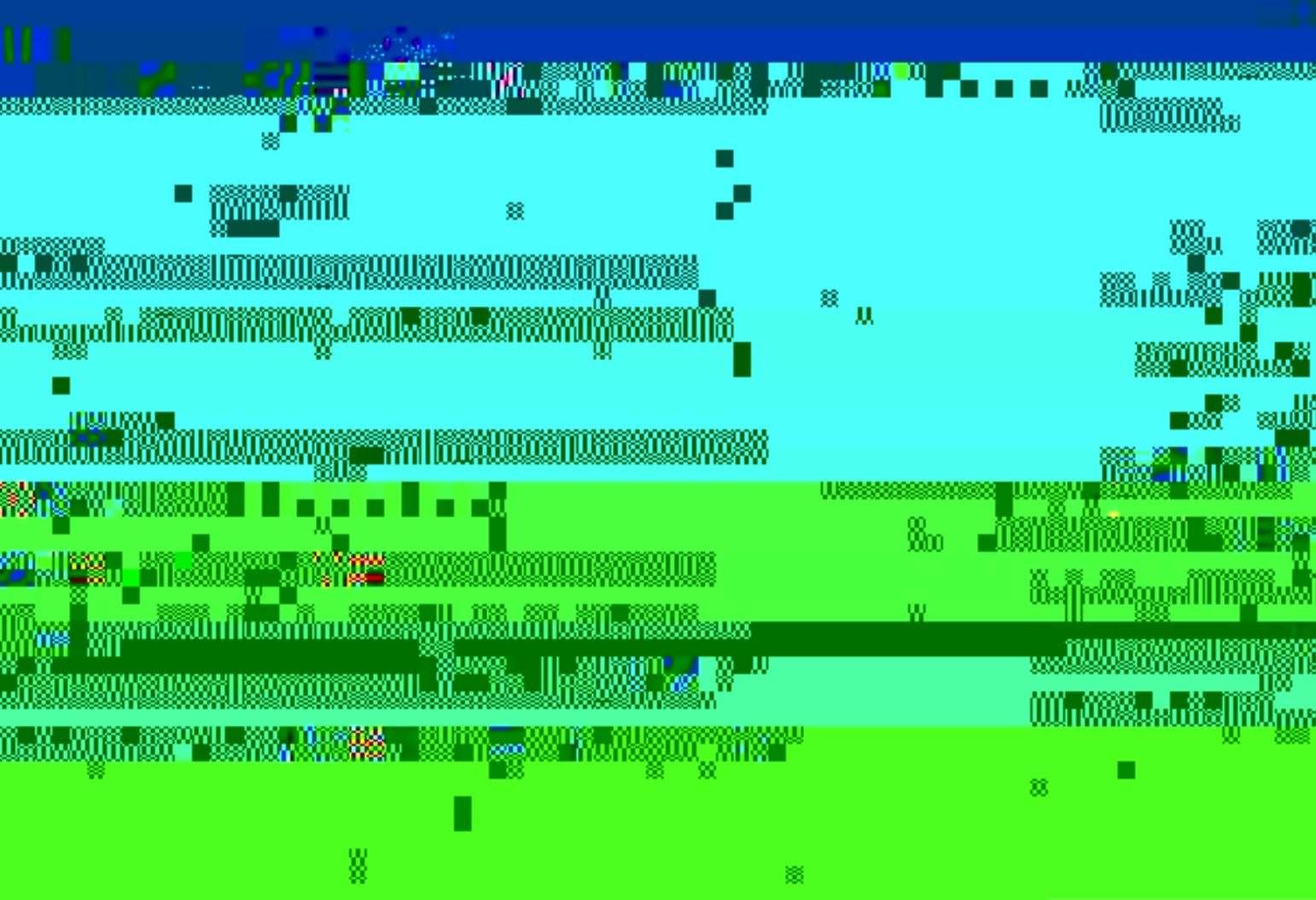
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concert with Berry, and with Berry's authorization when they committed

alleged in this complaint.

JURISDICTION

5. The Court has

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... conduct the interview.

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8. After the interview, Berry asked Sells if he planned to interview

Brian Thompson, a former Grand Dragon

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doors, and a third Klan follower blocked the door

CLAIMS

First Claim: False Imprisonment

15. Sells and Thiel were confined by Klan followers intentionally confined Sells and Thiel.

16. Sells and Thiel were confined

18. As a result of being confined by Berry and his Klan followers, Sells and Thiel were unlawfully deprived of their personal liberty and freedom of locomotion.

19. As a result of being confined by Berry and his Klan followers, Sells and Thiel were frightened and apprehensive, and they suffered other mental distress and trauma.

20. Berry and his Klan followers acted within the scope of their duties for Berry, in concert with him, and with his authorization when they helped Berry confine Sells and Thiel.

Second Claim: Assault

21. By surrounding Sells and Thiel

(4) any other relief the Court deems appropriate.

Dated this 11th day of December, 2000.

Kingston Ave.

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