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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY: \_\_\_\_\_

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13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

16 REVEREND FATHER IAN ELLIOTT  
DAVIES; REVEREND J. EDWIN  
17 BACON, JR.; SHAKEEL SYED;  
RABBI HAROLD M. SCHULWEIS;  
18 REVEREND TERA LITTLE; RABBI  
JOHN ROSEVE; REVEREND PETER  
19 LAARMAN; DAVID N. MYERS;  
AND RABBI AMY BERNSTEIN,

20 Plaintiffs,

21 v.

22 LOS ANGELES COUNTY BOARD  
23 OF SUPERVISORS; AND WILLIAM  
T FUJIOKA,

24 Defendants.

Case No. **CV 14-0907 CAS-JEM**

**COMPLAINT**

1 **JURISDICTION**

2 1. This court has jurisdiction over Plaintiffs' claims under 28 U.S.C §  
3 1331, because those claims arise under the Constitution of the United States, under  
4 28 U.S.C. § 1343(a)(3), because those claims seek to redress deprivations, under  
5 color of state authority, of rights, privileges and immunities secured by the United  
6 States Constitution; and under 28 U.S.C. § 1343(a)(4), because those claims seek to  
7 secure equitable relief under an Act of Congress, specifically under 42 U.S.C. §  
8 1983. The court also has jurisdiction over Plaintiffs' state law claims under 28  
9 U.S.C. § 1367.

10 **VENUE**

11 2. Venue is proper in the Central District of California under 28 U.S.C.  
12 § 1391(b) because Defendants are located in this District and all of the acts and/or  
13 omissions complained of herein have occurred or will occur in the District.

14 **INTRODUCTION**

15 3. Symbols of religious faith are the principal means by which organized  
16 religion communicates the common belief systems and bond among adherents.  
17 Such symbols are instantly and universally recognizable for the religion each  
18 exclusively represents. The best known examples are: the cross, as the preeminent  
19 symbol of Christianity; the Star of David, as the preeminent symbol of Judaism; and  
20 the Crescent and the Star, as the preeminent symbols of Islam.

21 4. The cross is the most readily and widely identifiable of all religious  
22 symbols. As both the Ninth Circuit and California state courts have stated, the cross  
23 "represents with relative clarity and simplicity the Christian message of the  
24 crucifixion and resurrection of Jesus Christ, a doctrine at the heart of Christianity."  
25 *Ellis v. La Mesa*, 990 F.2d 1518, 1525 (9th Cir. 1993) (quoting *Okrand v. City of*  
26 *Los Angeles*, 207 Cal.App.3d 566, 579-80, 254 Cal.Rptr. 913, 922 (1989)).  
27  
28

1           5.       The cross is the iconic Christian symbol. The cross is omnipresent in  
2 Christian religious observances and celebrations: for example, as backdrop for  
3 baptisms, weddings, Easter sunrise services, Christmas masses. The cross is  
4 frequently found in Christian households, on automobile dashboards and as jewelry  
5 worn by Christians. Just this past December, *TIME* named Pope Francis as “Person  
6 of the Year”: the cover photograph showed the Pope wearing a necklace with a  
7 large and prominent cross and a ring bearing the cross.

8           6.       The universal religious message of the cross to Christians begins with  
9 its symbolism as the instrument of the crucifixion and triumph of Jesus Christ and  
10 includes the message to all Christians of God’s love in sacrificing his son for  
11 humanity. This significance is expressed in Scripture: *See, e.g., Colossians 2:15*  
12 (“Having disarmed the powers and authorities, he made a public spectacle of them,  
13 triumphing over them by the cross.”). Throughout the canonical gospels, Christ  
14 states: “And he who does not take his cross and follow after Me is not worthy of  
15 Me.” *Matthew 10:38-39; 16:24-25; Mark 8:34-35; Luke 9:23-24, 14:27.*

16           7.       One of the most famous verses in the New Testament states that  
17 acceptance of the doctrine symbolized by the cross – that Jesus is the son of God  
18 who was crucified for man’s salvation – provides the means of eternal life. *John*  
19 *3:16* (“For God so loved the world, that he gave his only begotten Son, that  
20 whosoever believeth in him should not perish, but have everlasting life.”).

21           8.       The same chapter of the New Testament also states that those who do  
22 not accept the doctrine symbolized by the Cross will not be saved. *John 3:18* (“He  
23 that believeth on him is not condemned: but he that believeth not is condemned  
24 already, because he hath not believed in the name of the only begotten Son of  
25 God.”). In other words, by adding the principal symbol of Christianity to a county  
26 seal, the county is lending its authority to a symbol that not only signifies that Jesus  
27 is the son of God, but also that anyone who does not accept him as the savior is  
28 unworthy of salvation.

1           9.     Notwithstanding the clear and unequivocal religious significance of the  
2 cross, the Los Angeles County Board of Supervisors approved on January 7, 2014  
3 the restoration of a cross to the official County seal, placing it conspicuously and  
4 starkly on the image of the San Gabriel Mission. Just ten years earlier, in 2004, the  
5 Board removed the cross from the County seal in acknowledgment of the fact that  
6 its continued presence constituted an endorsement in both actuality and appearance  
7 of religious preference. Indeed, in the initial seal, adopted in 1957, the Board  
8 included the cross to expressly communicate the influence of the church. Neither  
9 the 1957 seal nor the 2014 seal even attempts to moderate the cross's religious  
10 message or the preferred status of Christianity with respect to Los Angeles County  
11 by including either the symbols of other secular organizations or institutions or  
12 comparable symbols of other religions.

13           10.    The County seal is affixed prominently in County government  
14 buildings, including the County Hall of Administration and other seats of County  
15 governmental authority, on the uniforms and badges of County governmental  
16 officials and law enforcement personnel, on County governmental motor vehicles,  
17 and on official County documents and correspondence.

18           11.    Los Angeles County has a widely diverse religious population as well  
19 as a large population which does not affiliate with any religious congregation.  
20 According to 2000 County population data published by the Los Angeles Almanac  
21 website, of the approximate 58% of County residents who identify as affiliated with  
22 a religious congregation, 68.8% (3,806,377) identify as adherents to the Christian  
23 faith, 10.2% (564,700) identify as Jewish, 1.7% (92,919) identify as Muslims, 1.3%  
24 (70,000) identify as Buddhists, and 1.3% (70,000) identify as Hindu. Nearly four  
25 million County residents do not identify as affiliating with any religious  
26 congregation.

27           12.    The restoration of the cross to the County seal favors the Christian  
28 religion over all other religions and divides County residents by religion and by

1 adherence or non-adherence to religious beliefs. As such, the County seal including  
2 the restored cross violates the Establishment Clauses of the United States and  
3 California Constitutions, and the “No Preference Clause” and the “No Aid Clause”  
4 of the California Constitution.

### 5 PARTIES

6 13. Plaintiff Reverend Father Ian Elliott Davies has been rector of St.  
7 Thomas the Apostle Episcopal Church in Hollywood since 2002. Previously, Father  
8 Davies was the assistant priest at the Anglo-Catholic parish of All Saints, Margaret  
9 Street, London. He objects to and is offended by the Board’s decision to alter the  
10 County seal solely to add a cross to it while excluding the symbols any of the other  
11 faiths practiced by citizens of Los Angeles. St. Thomas the Apostle Hollywood  
12 states that it is “Anglo-Catholic by tradition, meaning we have a great respect for  
13 both the rich liturgical heritage of the church, and for living the message of social  
14 justice proclaimed by Jesus Christ.” The symbol of St. Thomas the Apostle is the  
15 cross.

16 14. Plaintiff Reverend J. Edwin Bacon, Jr. has been the rector of All Saints  
17 Church in Pasadena, California since 1995. Rev. Bacon graduated from the Candler  
18 School of Theology at Emory University, which named him their Whiteside  
19 Distinguished Preacher. In May, 2005, Church Divinity School of the Pacific  
20 conferred on Rev. Bacon an honorary Doctor of Ministry degree. In December,  
21 2005, he was named an Honorary Canon of the Cathedral of St. Paul by the Bishop  
22 of the Episcopal Diocese of Los Angeles. He objects to and is offended by the  
23 Board’s decision to alter the County seal solely to add a cross to it while excluding  
24 the symbols of any of the other faiths practiced by citizens of Los Angeles. All  
25 Saints Church’s “Mission and Vision” is “[f]ollowing our prophetic call, we seek to  
26 embody the inclusive love of God in Christ through Spirituality, Community, and  
27 Peace and Justice.” All Saints Church describes itself as “worship centered”: “Our  
28 pastoral, educational and discernment ministries are strengthened and transformed

1 by gathering for Word, sacrament and corporate prayer.” All Saints Church also  
2 states that it is “education minded”: “We prize learning, seeking to know the mind  
3 and will of God through Scripture, reason, tradition and human experience.” The  
4 symbol of All Saints Church is the cross.

5 15. Plaintiff Shakeel Syed is a member of the Los Angeles Council of  
6 Religious Leaders and Past Chairman of the Board of Clergy & Laity for Economic  
7 Justice in Los Angeles. Plaintiff Syed is a devout Muslim and a lay leader in the  
8 Southern California Muslim community. He regularly speaks about Islam and  
9 Muslims at Churches, Synagogues and other houses of worship and at schools and  
10 universities. He is a Los Angeles County citizen and taxpayer. Plaintiff Syed  
11 regularly comes into contact with the County seal during meetings at various county  
12 offices, including at the Sheriff’s Department and in visits to the County jail as a  
13 volunteer Muslim chaplain. He objects to and is offended by the Board’s decision  
14 to alter the County seal solely to add a cross.

15 16. Plaintiff Rabbi Harold M. Schulweis has been rabbi at Valley Beth  
16 Shalom in Encino, California since 1970. Rabbi Schulweis is one of the nation’s  
17 most respected rabbis. He combined a Talmudic education at Yeshiva College with  
18 graduate studies in modern philosophical and theological thought at New York  
19 University, the Jewish Theological Seminary and the Pacific School of Religion,  
20 from which he received his Ph.D in Theology. Rabbi Schulweis has been  
21 instrumental in the development of synagogue programs which address issues of  
22 Jewish education and interfaith dialogue and is the Founding Chairperson of the  
23 Jewish Foundation for the Righteous, an organization that identifies and awards  
24 grants to non-Jews who risked their lives to aid those threatened by Nazis. He has  
25 received numerous honors and awards, including the 2008 National Jewish Book  
26 Award, the Spirit of the Immortal Chaplains Award (2006), and the Israel Prime  
27 Minister’s Medal (1975). He objects to and is offended by the Board’s decision to  
28 alter the County seal solely to add a cross to it while excluding the symbols of any

1 of the other faiths practiced by citizens of Los Angeles. The philosophy of Valley  
2 Beth Shalom is to build “a synagogue community committed to the quest for a  
3 Jewish life that is Godly, meaningful, and purposeful.” Its mission statement  
4 includes the following: “[W]e are commanded in the Torah: . . . ’You will be holy,  
5 as I am holy,’ (*Leviticus* 19).” The symbol of Valley Beth Shalom is the Star of  
6 David.

7       17. Reverend Tera Little serves as minister at Throop Unitarian  
8 Universalist Church in Pasadena. She also serves as regional staff for her  
9 denomination. She was ordained in 2011. Rev. Little received her M.Div. from  
10 Meadville Lombard Theological School in 2010, and was awarded an honor of  
11 excellence in religious education. She is a resident and taxpayer of the County of  
12 Los Angeles. Rev. Little objects to and is offended by the Board’s decision to alter  
13 the County seal solely to add a cross to it while excluding the symbols of any of the  
14 other faiths practiced by citizens of Los Angeles.

15       18. Plaintiff Rabbi John Rosove has been Senior Rabbi of Temple Israel of  
16 Hollywood since 1988. He received a Masters in Hebrew Letters from Hebrew  
17 Union College Jewish Institute of Religion (“HUC-JIR”), Los Angeles and Rabbinic  
18 Ordination, from HUC-JIR, New York. Rabbi Rosove describes his mission as “to  
19 build Jewish community and draw Jews and their families close to God, the Torah,  
20 Jewish tradition, the Jewish people, and the State of Israel as a Jewish national  
21 home.” The symbol of Temple Israel of Hollywood includes the Star of David. He  
22 objects to and is offended by the Board’s decision to alter the County seal solely to  
23 add a cross to it while excluding the symbols of any of the other faiths practiced by  
24 citizens of Los Angeles.

25       19. Plaintiff Reverend Peter Laarman recently retired from his position as  
26 Executive Director of Progressive Christians Uniting. He was ordained by the  
27 United Church of Christ in 1993. Rev. Laarman was called directly from seminary  
28 to serve as senior minister at New York City’s historic Judson Memorial Church,

1 where he worked for more than ten years. He is a resident and taxpayer of the  
2 County of Los Angeles. He regularly comes into contact with the County seal,  
3 including when he attends meetings of the Board of Supervisors. He objects to and  
4 is offended by the Board's decision to alter the County seal solely to add a cross to it  
5 while excluding the symbols of any of the other faiths practiced by citizens of Los  
6 Angeles.

7         20. Plaintiff David N. Myers is the Professor and Chair of the UCLA  
8 Department of History and former Director of the UCLA Center for Jewish Studies.  
9 Dr. Myers received his A.B. from Yale College in 1982, and undertook graduate  
10 studies at Harvard and Tel Aviv Universities before completing his doctorate at  
11 Columbia in 1991. He has written extensively in the fields of modern Jewish  
12 intellectual and cultural history and teaches courses in ancient, medieval and modern  
13 Jewish history. Among other topics, Professor Myers has written and taught about  
14 the history of anti-Semitism, and is thus cognizant of the recurrent acts of violence  
15 against Jews by Christians acting under the cover of the Cross (though often in  
16 violation of Church policy). He objects to and is offended by the Board's decision  
17 to alter the County seal solely to add a cross to it while excluding the symbols of  
18 any of the other faiths practiced by citizens of Los Angeles.

19         21. Plaintiff Rabbi Amy Bernstein serves as associate rabbi at Kehillat  
20 Israel. Originally from Atlanta, Georgia, she received her B.A. in English Literature  
21 and Cultural Anthropology from Northwestern University. Rabbi Bernstein  
22 attended the Reconstructionist Rabbinical College in Philadelphia for her rabbinic  
23 training, which included one year as a visiting graduate student at Ben Gurion  
24 University of the Negev in Israel. Prior to coming to Los Angeles, Rabbi Bernstein  
25 served as the rabbi of Temple Israel in Duluth, Minnesota for 13 years. As the only  
26 rabbi in the Northland Region Rabbi Bernstein represented the Jewish community to  
27 the greater Northland community. She served two terms as the President of the  
28 Arrowhead Interfaith Council and six years on the Board of Trustees of the College





1 and fruit trees, Pomona, the Spanish galleon San Salvador which sailed into San  
2 Pedro Harbor on October 8, 1542, a tuna representing the fishing industry of the  
3 county, a cow representing the dairy industry of the county, the Hollywood Bowl,  
4 representing the county cultural activities, two stars representing the motion picture  
5 and television industries and oil derricks representing oil fields discovered on Signal  
6 Hill. The cross was situated over the Hollywood Bowl. Contemporaneous with this  
7 adoption, the County submitted documentation to the Secretary of State of  
8 California which stated that the presence of the cross on the seal was intended, in  
9 part, to represent religion. The seal became effective on March 1, 1957. A copy of  
10 the 1957 seal is attached to the complaint as Exhibit 1.

11 ***B. The Board Removes the Cross in 2004 in Recognition that It***  
12 ***Represented an Inappropriate Statement of Religious Faith***

13 25. The 1957 seal served as the official County seal until 2004. In 2004,  
14 the ACLU Foundation of Southern California (“ACLU”) stated to County officials  
15 that it was prepared to litigate to have the cross removed from the official seal.

16 26. Shortly thereafter and in response to the ACLU statement, the Board  
17 voted to redesign the seal. The resulting seal did not include a cross. In all, the  
18 cross, the goddess Pomona and the oil derricks were removed. A sketch of the  
19 Mission San Gabriel and an Indian woman carrying a basket were put in the frames  
20 on the seal where the cross and Pomona had been situated. No image was  
21 substituted for the oil derricks. A copy of the 2004 seal is attached to this complaint  
22 as Exhibit 2.

23 27. The removal of the cross proved divisive because of the cross’s  
24 religious significance. There resulted considerable controversy, which included  
25 lengthy and emotional testimony accusing the Board of diminishing the religious  
26 significance of the seal along with public protests in opposition to the removal for  
27 the same reasons. An editorial in The Los Angeles Times supported removal of the  
28 cross from the seal on account of its religious message.

1           28.    On June 8, 2004, at the first of two public hearings about the seal, the  
2 Board heard hours of testimony from irate citizens and residents who both supported  
3 and objected for religious reasons to the removal of the cross. After listening to  
4 considerable testimony, Supervisor Yvonne Burke of the Second District stated with  
5 respect to the objectors as follows:

6                   SUP. BURKE: I'VE LISTENED HERE FOR A FEW  
7                   HOURS AND I KEPT THINKING THAT, IF THIS  
8                   CASE GOES TO TRIAL, I WOULD HATE FOR THEM  
9                   TO PLAY THIS HEARING BECAUSE, IF THERE'S  
10                  EVER ANY QUESTION OF WHAT WAS BEING  
11                  MOVED FORWARD AND WHAT THE OBJECTION  
12                  WAS TO THE VOTE THAT HAD BEEN TAKEN, IT  
13                  WAS CLEARLY, IT WAS A RELIGIOUS ONE. THAT  
14                  MOST OF THE PEOPLE HERE SPOKE . . .

15                  [INTERJECTIONS]

16 Supervisor Burke, a self-described Christian, was repeatedly interrupted by  
17 supporters of maintaining the cross on the seal, which she described as a "religious  
18 frenzy."

19           29.    Supervisor Michael D. Antonovich of the Fifth District stated during  
20 this hearing that ". . . these individuals do have the right of free speech and religious  
21 speech is still a freedom of speech that's given to everyone."

22           30.    The second public hearing before the Board took place on  
23 September 24, 2004. At this hearing, Supervisor Antonovich objected to the  
24 depiction of the San Gabriel Mission ultimately adopted because

25                   WHAT IS DEPICTED IS A BACK DOOR, THE REAR  
26                   END OF THE CHURCH. THAT IS NOT THE SYMBOL  
27                   OF THE MISSION. THE SYMBOL OF THE MISSION

28

1 WAS AN OPEN DOOR TO BRING THE GOOD NEWS

2 . . .

3 Christians often refer to the gospel (the four books in the Bible that describe the life  
4 of Jesus Christ” as the “good news” of redemption through the life and death of  
5 Jesus). In fact, “gospel” derives from an Old English word meaning “good news.”

6 ***C. The Cross Is Restored to the County Seal***

7 31. On January 7, 2014, Supervisors Antonovich and Knabe, who had cast  
8 the two dissenting votes to the 2004 motion to remove the cross from the then-  
9 County seal, introduced a motion to restore a cross to the County seal by placing it  
10 on the apex of the roof of the San Gabriel Mission. The motion did not propose any  
11 other changes to the seal, nor does the revised seal include any contextualization to  
12 even suggest that the addition of the cross serves any secular purpose.

13 32. The motion was opposed by the ACLU and by the Anti-Defamation  
14 League (“ADL”). In a letter to the Board dated January 6, 2014, the ADL stated in  
15 pertinent part:

16 If you vote to add a cross to the County seal, you send the  
17 divisive and exclusive message that you not only endorse  
18 religion over non-religion, but also prefer Christianity over  
19 all the other diverse faiths within the County. This  
20 message is contrary to your legal and moral responsibility  
21 to treat all people alike. While a cross may be appropriate  
22 on a house of worship, private school or university, it is  
23 unsuitable on a government seal that represents a  
24 religiously and ethnically diverse county of over 10  
25 million people. It is also important to note the Mission  
26 was added to the seal in 2004 without the cross, and it  
27 currently reflects the historical influence of missions in  
28 California without promoting a single religious view.

1  
2 33. An editorial by The Los Angeles Times dated January 3, 2014 also  
3 opposed restoration of the cross to the County seal. The editorial stated in pertinent  
4 part:

5 Los Angeles County Supervisors Don Knabe and  
6 Michael D. Antonovich are beginning 2014 by reopening  
7 the contentious debate over whether there should be a  
8 Christian cross on the county seal. Words almost fail, but  
9 here's one that comes to mind: Seriously?

10 . . .

11 Their argument – that the depiction of the mission is  
12 “artistically and architecturally inaccurate” because in real  
13 life there is now a cross on top of the main building – is  
14 laughable. The little image of the mission on the county  
15 seal doesn't include bells, either, and San Gabriel's bells  
16 are famous.

17 But of course, this is not about the depiction and it's not  
18 about the bells, either. It's about a not-very-subtle attempt  
19 by two elected officials who were on the losing end of the  
20 2004 vote to change the county seal to now sneak the  
21 primary symbol of Christianity back in.

22 34. The motion to restore the cross to the County seal passed 3-2, with  
23 Supervisors Molina and Yaroslavsky voting against the motion. As the ADL letter  
24 states, the presence of the San Gabriel Mission on the 2004 seal represents the  
25 historical role of missions in Southern California without promoting or endorsing a  
26 particular religion or religious belief. The purpose and effect of the motion was to  
27 favor the Christian faith over other religious and non-religious beliefs. A copy of  
28

1 the new seal, adopted by the Board on January 7, 2014, is attached to this complaint  
2 as Exhibit 3.

3 35. Each of the plaintiffs is a Los Angeles County taxpayer and will see the  
4 County seal frequently. Each plaintiff is deeply offended by the inclusion in the  
5 County seal of a clearly identifiable religious symbol and each believes that the  
6 inclusion was deliberately intended to promote a sectarian purpose of favoring  
7 Christianity among all religions practiced in Los Angeles County and disfavor other  
8 religious and non-religious beliefs.

9 36. The County seal is prominently displayed throughout the County,  
10 including outside County buildings, on County vehicles, on the County letterhead,  
11 and numerous other places. The change to the County seal will cost taxpayers  
12 thousands of dollars.

13 37. The violations described in the preceding paragraphs are ongoing and  
14 will continue until and unless this court grants the relief Plaintiffs seek by this  
15 Complaint.

16 **CAUSES OF ACTION**

17 **First Cause of Action**

18 **Violation of 42 U.S.C § 1983 (Based on the Violation of the Establishment**  
19 **Clause of the United States Constitution as incorporated by the Fourteenth**  
20 **Amendment)**

21 38. Plaintiffs incorporate by reference the foregoing paragraphs of this  
22 Complaint as though fully set forth herein.

23 39. Defendants, who are charged with respecting on equal terms the  
24 religious and non-religious beliefs and affiliations of all residents within Los  
25 Angeles County, have denied and continue to deny Plaintiffs their right to practice  
26 their faith and religious beliefs freely and without disfavor by their government or  
27 government officials. Defendants are denying Plaintiffs rights of religious freedom  
28

1 equality and to government impartiality as guaranteed by the First and Fourteenth  
2 Amendments.

3 40. Defendants have threatened to and will implement the addition of the  
4 cross to the Seal in violation of Plaintiffs' rights under the First and Fourteenth  
5 Amendments.

6 41. As a direct and proximate result of Defendants' unlawful conduct,  
7 Plaintiffs will further suffer irreparable harm.

8 **Second Cause of Action**

9 **Violation of the California Constitution, Article I, § 4**

10 42. Plaintiffs incorporate by reference the foregoing paragraphs of this  
11 Complaint as though fully set forth herein.

12 43. Defendants, who are charged with non-discrimination against and  
13 affording no preference toward any religion or religious beliefs, have denied and  
14 continue to deny Plaintiffs their right to practice their faith and religious beliefs  
15 freely and without disfavor by their government or government officials.  
16 Defendants are denying Plaintiffs rights of religious freedom, equality and to  
17 government impartiality as guaranteed by Article I, § 4 of the California  
18 Constitution.

19 44. Defendants have threatened to and will implement the addition of the  
20 cross to the Seal in violation of Plaintiffs' rights under Article I, § 4 of the  
21 California Constitution.

22 45. As a direct and proximate result of Defendants' unlawful conduct,  
23 Plaintiffs will further suffer irreparable harm.

24 **Third Cause of Action**

25 **Violation of the California Constitution, Article XVI, § 5**

26 46. Plaintiffs incorporate by reference the foregoing paragraphs of this  
27 Complaint as though fully set forth herein.  
28





1 D. Attorneys fees pursuant to 42 U.S.C § 1988 and California Code of  
2 Civil Procedure § 1021.5 and any other appropriate statutory basis.

3 E. Such other relief as the Court deems just and proper.  
4

5 DATED: February 5, 2014

Respectfully submitted,

6 CALDWELL LESLIE & PROCTOR, PC  
7 LINDA M. BURROW  
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14 By Mark Rosenbaum  
15 MARK D. ROSENBAUM  
16 Attorneys for Plaintiffs  
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# **Exhibit 1**



Seal of the County of Los Angeles, Adopted March 1, 1957

# **Exhibit 2**



Seal of the County of Los Angeles, Adopted September 14, 2004

# **Exhibit 3**



Seal of the County of Los Angeles, Adopted January 7, 2014