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11/04/2025
25-0640

9 Attorneys for Plaintiff GABRIELA LEOS

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT

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14 GABRIELA LEOS, an individual
15 Plaintiff,

16 vs.

17 CITY OF EL MONTE, a municipality;
18 JESSICA ANCONA, both in her
19 official capacity and as an individual;
20 Does 1-50

21 Defendants.

22 gangs
23 Flores

Case No.: 2:23-cv-02427-KK-JPR

THIRD AMENDED COMPLAINT
FOR DAMAGES

1. RETALIATORY FIRST
AMENDMENT CLAIM (42
U.S.C. SECTION 1983)
2. NEGLIGENCE;
3. VIOLATION OF CAL. CIVIL
CODE § 52.1

DEMAND FOR JURY TRIAL

Honorable Kenly Kiya Kato
U.S. District Court Judge

&

F.B.I

TORRES + SIEGRIST

1 over by the Mayor to specifically threaten and intimidate plaintiff at this
2 public event.

3 111. The entire episode, including the MAYOR gesturing in plaintiff's
4 direction, the Felon Gang member then pointing at plaintiff, walking up to
5 plaintiff and telling her to stop filming "the Mayor" and identifying himself
6 as an El Monte Flores Gang member was all captured by plaintiff via her cell
7 phone video/audio.

8 112. Fearing for her and her husband's safety because of the notorious
9 Flores street gang, plaintiff and her husband immediately left the event that
10 they had paid money to attend.

11 113. To this day, plaintiff remains in fear of her safety given what occurred
12 and that she lives in El Monte.

13
14 **XIII. THE MAYOR IS NOW EXPLORING WAYS TO ATTEMPT TO**
15 **KEEP PLAINTIFF FROM ATTENDING CITY EVENTS AND**
16 **COMMUNITY GATHERINGS**

17 114. Most recently, following plaintiff's attendance at a memorial service
18 for former deceased Police Chief Ben Lowry, the MAYOR contacted the
19 CITY ATTORNEY and CITY MANAGER.

20 115. The MAYOR has now directed that both come up with a way to keep
21 plaintiff from attending community gatherings and CITY events.

22 116. Ultimately, the retaliation by ANCONA has not and will not stop.

23 117. The MAYOR has proven that there is no limit to what will fuel her
24 revenge tactics against plaintiff.

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