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4 Attorneys for Claimant GERALD PEARLMAN
as Executor of the ESTATE OF NANCY PEARLMAN
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8 GOVERNMENTAL TORT CLAIM
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11 In re: GERALD PEARLMAN, as)
Executor of the ESTATE OF NANCY)
12 PEARLMAN)
13 Claimants,) CLAIM FOR DAMAGES
[Government Code § 910, et. seq.]
14 vs.)
15 COUNTY OF VENTURA, and unknown)
VENTURA COUNTY DEPUTY)
16 SHERIFFS)
17 Respondents.)
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19 Claimant, GERALD PEARLMAN, on behalf of, and as the duly appointed Executor of the
20 ESTATE OF NANCY PEARLMAN, hereby makes his claims against the COUNTY OF VENTURA and
21 unknown VENTURA COUNTY DEPUTY SHERIFF'S pursuant to Government Code, § 910, et. seq.:

- 22 1. Names and addresses of the Claimant is as follows:
23 (a) Gerald Pearlman, 931 Corte La Cienaga, Camarillo, CA 93010.
24 2. Notices concerning this claim should be sent to: PETER M. WILLIAMSON, Esq., Law
25 Offices of WILLIAMSON & KRAUSS, 13915 Panay Way, Suite One, Marina del Rey, CA 90292; (310)
26 822-3377.
27 3. Claimant, as duly appointed Executor of the Estate of Nancy Pearlman, brings this claim
28 based on the wrongful death of decedent, NANCY PEARLMAN, (the Executor's wife), who was illegally

1 detained, battered, assaulted and fatally shot by deputies of the Ventura County Sheriff's Department, whose
2 identities are presently unknown to the Claimant.

3 This claim is grounded on deprivations of federal and state civil rights, false arrest, brutality,
4 excessive use of force, assault & battery, trespass, abuse of process, invasion of privacy, libel & slander,
5 conspiracy to obstruct justice, conspiracy to deprive civil rights; torts in essence via violations of Penal Code
6 § 118 (perjury), § 127 (Subornation of perjury), § 146 (unlawful arrest/detention by peace officer), §147
7 (willful oppression and inhumanity to detainees), § 149 (felony excessive brutality by peace officer), § 148.5
8 (false report of crime), § 132 (offering false evidence), § 133 (deceiving witnesses), § 134 (preparation of
9 false evidence), § 135 (destroying evidence), § 136 (intimidating witnesses), § 136.1 (preventing and
10 dissuading witnesses), Government Code, § 6204 (falsification of crime/arrest reports), negligence,
11 negligent employment of peace officers; negligent retention and supervision of peace officers; intentional and
12 negligent infliction of emotional distress; official customs, policies and practices of Ventura County Sheriffs
13 Department and County of Ventura to ignore civilian police misconduct complaints, failure to impartially
14 investigate such claims in accordance with acceptable law enforcement standards, tacit condonation and
15 approval of police officer illegality, brutality, excessive use of force, wrongful death, corruption, dishonesty
16 and the peace officer's code of silence, failure to report known incidents of police misconduct to the
17 California Department of Justice, failure to maintain necessary and reasonable peace officer personnel records
18 in correlating peace officers to misconduct lawsuits, tort claims, settlements and judgments, failure to train
19 in the use of deadly force, and failure to train tactics and procedures for dealing with disturbed or mentally
20 ill citizens.

21 4. Damages claimed: Wrongful death, loss of love, comfort and society, punitive damages
22 against individual Deputy Sheriffs, costs of suit, attorneys fees and general damages to Claimant.

23 5. In addition to the COUNTY OF VENTURA, Claimant brings this claim against at least
24 four (4) individual Deputy Sheriffs who were involved in the fatal shooting of decedent, NANCY
25 PEARLMAN, and its subsequent cover-up, but whose identities are presently unknown to the Claimant.

26 6. Date and time of incident: March 20, 2006 at approximately 7:00 p.m.

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7. Location of incident: Point Magu State Park, Pacific Coast Highway, Camarillo, CA.

8. Damages Claimed: In excess of \$5,000,000.00.

DATED: August 28, 2006

WILLIAMSON & KRAUSS

BY: _____
PETER M. WILLIAMSON
Attorneys for Claimants
GERALD PEARLMAN, Executor of the
ESTATE OF NANCY PEARLMAN