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IN THE CIRCUIT COURT OF THE FIRST CIRCUIT
STATE OF HAWAII

SHERI TAFLINGER,	) CIVIL NO.
	) (Other Civil Action)
Plaintiff,	)
vs.	)
	)
CITY AND COUNTY OF HONOLULU;	)
HONOLULU POLICE DEPARTMENT	) COMPLAINT; DEMAND FOR TRIAL BY
(“HPD”); HPD OFFICER LT.	) JURY; SUMMONS
BIENVENIDO VILLAFLO II., in his	)
individual capacity; HPD OFFICER	)
MAJOR PAUL OKAMOTO, in his	)
individual capacity; HPD OFFICER	)
MAJOR MANUEL HERNANDEZ III, in	)
his individual capacity; DOE PERSONS 1-10;	)
DOE CORPORATIONS and	)
PARTNERSHIPS 1-10; ROE “NON-	)
PROFIT” CORPORATIONS 1-10; DOE	)
UNINCORPORATED ORGANIZATIONS	)
1-10; and ROE GOVERNMENTAL	)
ENTITIES 1-10,	)
Defendants.	

COMPLAINT

COMES NOW Plaintiff SHERI TAFLINGER ("Plaintiff"), by and through her undersigned counsel, BOSKO PETRICEVIC, ATTORNEY AT LAW LLC, and brings this Complaint against the above-named Defendants, and complains and alleges as follows:

I. PARTIES

1. Plaintiff **SHERI TAFLINGER** (“Plaintiff” or “Mrs. Taflinger”), at all relevant times mentioned in this Complaint, is a resident of the City and County of Honolulu, State of Hawaii and HPD officer.

2. Defendant **CITY AND COUNTY OF HONOLULU** (“Defendant C&C”) is and has been a duly organized municipal corporation of the State of Hawaii and at all times material hereto.

3. Defendant **HONOLULU POLICE DEPARTMENT** (“HPD”) is and has been a duly organized municipal corporation of the State of Hawaii and at all times material hereto.

4. Defendant **HPD OFFICER LT. BIENVENIDO VILLAFLOR II** (“**Lt. VILLAFLOR**”), at all relevant times mentioned in this Complaint, is a resident of the City and County of Honolulu, State of Hawaii. He is being sued in his individual capacity.

5. Defendant **HPD OFFICER MAJOR PAUL OKAMOTO** (“**Major OKAMOTO**” or “**Captain OKAMOTO**”), at all relevant times mentioned in this Complaint, is a resident of the City and County of Honolulu, State of Hawaii. He is being sued in his individual capacity.

6. Defendant **HPD OFFICER MAJOR MANUEL HERNANDEZ III** (“**MAJOR HERNANDEZ**”), at all relevant times mentioned in this Complaint, is a resident of the City and County of Honolulu, State of Hawaii. He is being sued in his individual capacity.

7. Defendants C&C and HPD are liable for the conspiratorial, intentional, discriminatory, retaliatory, negligent and/or tortious and/or wrongful conduct of all of their officers, rank and file, members, leadership, employees, presidents, managers owners, agents and/or representatives pursuant to the doctrine of Respondeat Superior and/or principles of

Agency.

8. Defendants DOE PERSONS 1-10, DOE CORPORATIONS 1-10, DOE PARTNERSHIPS 1-10, ROE "NON-PROFIT" CORPORATIONS 1-10, DOE UNINCORPORATED ORGANIZATIONS 1-10 and ROE GOVERNMENTAL ENTITIES 1-10, are sued herein under fictitious names for the reason that, after thoroughly investigating the facts of the action, said Defendants' true names and identities are presently unknown to the Plaintiffs, except upon information and belief, that they are connected in some manner with the named Defendants and/or were the agents, servants, employees, employers, representatives, co-venturers, associates, vendors, suppliers, manufacturers, distributors, subcontractors or contractors and/or owners, lessees, assignees, licensees, of the named Defendants and/or were in some manner presently unknown to the Plaintiffs engaged in the activities alleged herein and/or were in some manner responsible for the injuries or damages to the Plaintiffs which was a proximate cause of injuries or damages to the Plaintiffs and that their "true names, identities, capacity, activities and/or responsibilities" are presently unknown to the Plaintiffs or their attorney. To ascertain the full names and identities of Defendants DOE PERSONS 1-10, DOE CORPORATIONS 1-10, DOE PARTNERSHIPS 1-10, ROE "NON-PROFIT" CORPORATIONS 1-10, DOE UNINCORPORATED ORGANIZATIONS 1-10 and ROE GOVERNMENTAL ENTITIES 1-10, Plaintiffs' counsel have investigated the facts alleged herein through *inter alia*, interviews of the Plaintiffs and the records and files submitted by the Plaintiffs. When the true names and capacities are ascertained, through appropriate discovery, Plaintiffs will move to amend this Complaint to state the true names.

II. JURISDICTION AND VENUE

9. Plaintiff incorporates, as if realleged, paragraphs 1 through 8 herein, and incorporates the same by reference as though set forth fully herein.

10. All of the events done by all of the above-named Defendants described in this Complaint occurred within the City and County of Honolulu, State of Hawaii, and within the jurisdiction and venue in the Circuit Court of the First Circuit, State of Hawaii.

11. This Complaint is brought pursuant to Sections 603-21.5(3), 634-35, 663-1 and Chapter 662 of the Hawaii Revised Statutes (hereinafter referred to as “HRS”).

12. Venue is proper in this Court under Section 603-36 of the HRS, as the alleged events arose from actions between the Plaintiff and Defendants and events and/or omissions giving rise to this action arose in this judicial circuit.

13. Personal jurisdiction is proper in this Court because all of the above-named Defendants have minimum contacts with the State of Hawaii because all of the Defendants live and do business in State of Hawaii and as such have direct contact with the State of Hawaii. All of the Defendants and Plaintiff are residents of State of Hawaii.

14. On July 3, 2024, Hawaii Civil Rights Commission has issued a “Notice of Dismissal and Right to Sue in Sheri Taflinger vs. City and County of Honolulu; FEPA No. 22717; EEOC No. 486-2023-00455”, giving the Plaintiff a right to file a private lawsuit against the above listed Defendants in the State Circuit Court within ninety (90) days after receipt of the above referenced Notice of Right to Sue pursuant to Hawaii Revised Statutes Section 368-12 and H.A.R. §12-46-20.

III. NATURE OF THE CASE

15. Plaintiff incorporates, as if realleged, paragraphs 1 through 14 herein, and incorporates the same by reference as though set forth fully herein.

16. In a nutshell, this case is about crooked and deceitful Honolulu Police Department's ("HPD") high ranking officers and supervisors (Defendants **LT. VILLAFLORE, MAJOR PAUL OKAMOTO and MAJOR HERNANDEZ**) and other Defendants engaging in pervasive discrimination, sexual harassment, sex discrimination and whistleblower retaliation against Plaintiff and continuing to engage in such behavior.

17. This lawsuit is further about shocking acts of gender discrimination, sexual harassment, pervasive over-sexualization of female officers and **HPD sponsored sex orgies** and subsequent retaliation against Plaintiff for reporting and complaining about the same.

IV. FACTS

18. Plaintiff incorporates, as if realleged, paragraphs 1 through 17 herein, and incorporates the same by reference as though set forth fully herein.

19. **May 03, 2022.** Mrs. Taflinger overheard a conversation from her former desk area in the Administrative Office at the Training Academy between (at the time) Captain Mikel KUNISHIMA and Lieutenant VILLAFLORE. The Conversation was about Corporal Carmel HURLEY and Mrs. Taflinger, where Captain Kunishima and Lt. Villaflor were spreading defamatory and untrue statements that both were against female recruits and didn't like "Haole girls". The back story to this irresponsible rumor spreading by HPD ranking officers was that Plaintiff reported to the Command's attention how unfair the Physical Fitness Assessment was regarding the prospective recruits and that certain female recruit (Recruit RAPP) was given more chances than any other recruit to pass the assessment due to male ranking officers showing sexual attention to her.

20. Mrs. Taflinger told Capt. KUNISHIMA that the Training Division needs to be careful about CHEATING in all aspects as the HPD has already lost civil litigation relating to this issue (Deeann Koanui). Plaintiff and Corporal HURLEY simply wanted to remind the command about the inconsistencies and preferential treatment being shown on an illegal basis. This is the first of many concerns Mrs. Taflinger will have raised related to this case. Instead of modifying their behavior and taking these concerns seriously, Lt. VILLAFLORES stated that he did not want Corporal Hurley and Mrs. Taflinger around when Recruit RAPP did her physical retest to cover up their illegal conduct. After overhearing this, Plaintiff texted Capt. KUNISHIMA and told him that she didn't appreciate them spreading inaccurate rumors about Corporal Hurley and herself (Plaintiff has saved these text messages). Capt. KUNISHIMA essentially responded with meaningless lip service and nothing was done.

21. Soon after this incident, Plaintiff was up for the Sergeant's promotion. Major Mike Lambert allowed Captain KUNISHIMA to write a To/From requesting Plaintiff's Special LONG-TERM Assignment back to the Training Academy. At this time, former retired Field Training Sergeant Duane ESPINUEVA made it known that he was going to retire in August of 2022 and that Plaintiff taking over the program was highly considered. Then Major Mike LAMBERT also agreed that Plaintiff's To/From was to get Plaintiff back to take a recruit class but upon assignment, she would also take over the Field Training and Evaluation Program.

22. **August 07, 2022.** Mrs. Taflinger was back on Special Assignment to the Training Academy to take over the 207th Recruit Class and the Field Training and Evaluation program. Upon her assignment, one of Plaintiff's duties was to pick her class staff. Even though Plaintiff wanted to choose Corp. HURLEY, LT. VILLAFLORES immediately ordered Plaintiff that she could not have two females on a class staff. Mrs. Taflinger, was shocked at this open gender

discrimination, and tried to plead her case for Corp. HURLEY to be on her staff but was expressly ordered that she could not have her on the staff because she was a woman. Plaintiff disappointedly relayed this order to Corp. HURLEY.

23. During this time, Sergeant Jennifer BUGARIN was also assembling her class staff as she was to be the 208th Recruit Class Sergeant and was also rejected when she requested for Corp. Hurley to be on her staff and got the same reason which was that two females could not be on a same class staff. Plaintiff, who was flabbergasted by this blatant open discrimination decided to give in as she was newly assigned and did not want to argue with Lt. VILLAFLOR. As a result, she ended up with two males on her staff. She felt like her hands were tied and she had to act like a subservient subordinate simply because of her gender.

24. Note, during this time, Lt. VILLAFLOR was Mrs. Taflinger's's immediate Lt. and Lt. Issac IMOTO was the acting Captain at the time because Captain KUNISHIMA was reassigned due to a Sexual Harassment Complaint before Plaintiff came to her special assignment. Sexual Harassment Complaints are not foreign to the Department and one would think HPD would be vigilant to obviate any misconduct.

25. Mrs. Taflinger's Field Training Staff (hereinafter "FTEP Staff") brought to Mrs. Taflinger's attention the reoccurring issues they were having with Lt. VILLAFLOR. The FTEP staff at the time told Mrs. Taflinger that Lt. VILLAFLOR did not give them as much of a "hard time" when male Sgt. ESPINUEVA was around.

26. When Mrs. Taflinger took over the training program, the 203 Recruit class was starting the FTEP and the 202nd was in their 2nd or 3rd phase. Mrs. Taflinger was INSTRUCTED by Lt. VILLAFLOR that - at the time - Recruit M. STANT was to only ride with Female FTOs. Even though Plaintiff related that his request would be challenging because HPD female and male FTOs

ratios are uneven and it didn't look right to segregate officers on a gender basis, she was still ordered by Lt. VILLAFLORES to make it happen. Plaintiff managed to set that female recruit up with female FTOs. Recruit STANT had no training issues and succeeded in the program.

27. During this time, another shocking event happened. Mrs. Taflinger was informed that the 203rd Recruit Class was having their class party at a beach house location in Waimanalo. This 203rd-class party is one of the most shameful things I ever heard happening at HPD. **Mrs. Taflinger was informed that Recruit STANT had sexual relations at the party with Corporal Detrich KAMAKANI and Corporal Jose VILLANUEVA at the same time in the darkness of the party.** Recruit STANT's hair reportedly was, "all messy like someone was having wild sex" and the females in that recruit class also got into altercations amongst themselves for unknown reasons. Moreover, Plaintiff was informed that Corporal Chad GUSHIKUMA (whom is the current Acting Sergeant for the FTEP and also less qualified than Plaintiff) also had sexual relations with one of the other female recruits. What was most shocking was that this was all happening in the presence of Lt. VILLAFLORES who was at the party.

28. **Mrs. Taflinger was also informed that Lt. VILLAFLORES was also having a sexual relationship with Recruit STANT. As this information became more and more public, to cover this up, Plaintiff's supervisor Lt. VILLAFLORES ordered all the female officers to be quiet and stop raising concerns about it.** This made Mrs. Taflinger extremely uncomfortable and frustrated because HPD has a clear Standard of Conduct and fraternization policy at the Training Academy. These sexual incidents where female recruits were being sexually exploited were swiped under the rug.

29. As a further cover and in an attempt to undermine Plaintiff's voicing her concerns, LT. VILLAFLORES came in on the last day of the 203rd recruit Class and told the whole class

that they did not need to follow the chain of command and that they could skip Plaintiff who was the Sergeant at the time and go straight to him. He even gave out his cell phone number. This was a scare tactic and an abuse of authority by Lt. VILLAFLORES, as no one in the class came up to Mrs. Taflinger or her staff concerning anything Human Resource related. Plaintiff was shocked, disturbed, and felt powerless to prevent any further sexual abuse female recruits were experiencing between her subordinates and the Training Staff.

30. **November of 2022.**, The Training Division got an email from then Captain Manual HERNANDEZ stating that moving forward any class parties that involve alcohol were not allowed. Major Hernandez was briefed regarding all the illegal discriminatory orders issued by Lt. VILLAFLORES and regarding all of the sexual harassment and retaliatory incidents committed by LT. VILLAFLORES who made everyone uncomfortable, especially Plaintiff's female staff Corporal Kristen CHONG. But, Major Hernandez failed to institute any meaningful change.

31. From the time of Mrs. Taflinger's special assignment to the Training Division, Lt. VILLAFLORES would continue to bring up a hostile situation involving Corp. CHONG and the resignation of a former Recruit Raine YOUNG; blaming Corp. Chong. Lt. VILLAFLORES would regularly bring up that situation to escalate conflict, harass and make Corp. Chong uncomfortable, as retaliation. Lt. VILLAFLORES's consistent harassment would make Corp. Chong and Mrs. Taflinger very uncomfortable. After Mrs. Taflinger expressed to Lt. VILLAFLORES that he was picking on Corp. Chong and creating a hostile work environment, he became extremely hostile, denied his actions and continued his behavior. Corp. CHONG was one the best workers Plaintiff has worked with and a true asset to the department and Lt. VILLAFLORES kept harassing since she was a female.

32. **September 2023 - January 2023.** Mrs. Taflinger was constantly dealing with the fallout in the 203rd Recruit Class, specifically the training staff continually engaging in sexual

relations with Recruit STANT. Plaintiff realized that this is why she could not have another female officer working with her so that Lt. VILLAFLORES and other male officers could isolate female recruits and take advantage of them. Lt. VILLAFLORES expressly did not allow Plaintiff to do her job as the FTEP Sgt. to train and protect the female recruits.

33. For the 203rd RC, LT. VILLAFLORES would order Mrs. Taflinger to do things as a supervisor that she was not comfortable performing like grading recruits who were a liability and not achieving acceptable results as successful and ordering Plaintiff to pass them even though they should not have. Lt. VILLAFLORES was essentially doing this as his personal recruitment of potential future sexual partners from the female recruit pool. It was a disgusting practice similar to pimping. But, because Mrs. Taflinger was on Special Assignment, she felt like a battered wife who had to listen to Lt. VILLAFLORES or she would be reassigned back to her original assignment, and female recruits would then lose any support and be completely at the mercy of Lt. VILLAFLORES. During this time, Plaintiff was mentally and psychologically abused by Lt. VILLAFLORES and had to continue witnessing his disgusting sexist practices.

34. **March 3, 2023.** The 207th RC had their OC spray day. The 203rd RC assisted as other RCs in the past have helped other Senior classes at the Training Academy. Spray day is a normal training function at the Academy. Shockingly, Plaintiff viewed VILLAFLORES taking his shirt off in the gymnasium at the academy in front of everyone around that area. He was clearly showing off to female, Recruit STANT, who was there helping along with the other females belonging to the 203rd RC. Seeing VILLAFLORES's bare chest sexually strutting himself around the gym, made Plaintiff extremely uncomfortable and helpless, as she knew more than she wanted to at this point with what seemed no effective recourse.

35. Lt. VILLAFLORES' actions were inappropriate and disturbing, especially considering that there is a dress and grooming MOP (method of operation) for the training academy and the locker rooms nearby. It was gross and disgusting. He was acting like a pimp and treating the female recruits as his personal harem. When this occurred, Mrs. Taflinger got the attention of my 207th RC staff CPL Gilbert YROJO and Officer Dannan SMITH. Despite Plaintiff's complaints and expressing concerns, HPD's management allowed Lt. VILLAFLORES to continue to operate as a pimp and engage in further sexual harassment and gender discrimination.

36. **January 2023 or December 2022.** Despite Plaintiff's complaints and expressing concerns, HPD's management allowed Lt. VILLAFLORES to continue to operate as a pimp and engage in further sexual harassment and gender discrimination. The 207th Recruit Class had an OC exposure day up in the DOJO. Lt. VILLAFLORES allowed the Recruit J. SELLARS to be in her sports bra, which is typically not permitted as recruits have a standard dress requirement while on campus. Mrs. Taflinger witnessed Lt. VILLAFLORES ogling this female recruit in an obvious fashion.

37. Again, Plaintiff felt powerless to stop this behavior since Lt. VILLAFLORES was her superior and of higher rank. During this time, Lt. VILLAFLORES was openly gossiping about female recruits and discussing Recruit SELLARS sexual life, appearing to be obsessed about others' sexual lives, regularly bragging about his sexual conquests or how he was popular with the females.

38. **March 07, 2023.** Around 0920 hours, Mrs. Taflinger saw Lt. VILLAFLORES talking to then Capt. OKAMOTO while taking glances at her. Around 1700 hours, Capt. OKAMOTO responded to Plaintiff's email requesting 10-15 minutes of his time to update him on the 207th RC and FTEP. Possibly scared that Plaintiff was about to make more formal complaints relating to Lt. VILLAFLORES' disgusting and harassing behavior, Capt. Okamoto made it clear in his response that Plaintiff must notify Lt. VILLAFLORES of this meeting and Capt. Okamoto made it clear that Lt.

VILLAFLO must attend this meeting thereby preventing Plaintiff from being able to report Lt. VILLAFLO since he would intimidate Plaintiff with his presence.

39. Plaintiff had big hopes that since Capt. OKAMOTO was a new Capt. in her division, he would be able to hear her concerns and staff's complaints. Capt. OKAMOTO made it clear in his response that Lt. VILLAFLO needed to be notified of the meeting and be in attendance. Reluctantly, Mrs. Taflinger forwarded the email to Lt. VILLAFLO. Lt. VILLAFLO did not respond to Plaintiff's email until 3-8-23 at about 1400 hours. She felt so defeated at this point, knowing the person she was complaining about would also be present in this meeting.

40. **March 08, 2023.** Around 1511 hours, Plaintiff was finally crushed by the HPD management. Mrs. Taflinger entered the meeting with Capt. Okamoto and Lt. Villaflo. She entered the meeting with an outline of what she wanted to cover; however, she felt extremely intimidated being in OKAMOTO's office with VILLAFLO. She felt like she was coerced and her liberty was stripped away, as just about every time she attempted to say something, Lt. VILLAFLO interjected condescendingly undermining Plaintiff with a hostile tone. Plaintiff remained seated in her seat with her head down, shaking in fear.

41. At no time during this meeting during which Plaintiff's body language was screaming that she was feeling uncomfortable did Capt. OKAMOTO do ANYTHING to stop the bullying coming from Lt. VILLAFLO. Lt. VILLAFLO's tone was extremely hostile. With no resolve, Plaintiff was shockingly ordered that she had to take Lt. VILLAFLO on the San Jose trip which she agreed to because she was desperate to get out of the meeting. At this moment, Mrs. Taflinger realized she was truly powerless, she felt broken and her emotional health was crumbling, and the Department that was committed to protecting and serving the community was betraying its

very own values—respect, honor, and integrity. She realized she was a target because she was a female who was trying to stand up for herself, other females, and the reputation of the Department.

42. Immediately after she left the meeting, Plaintiff texted now Major M. HERNANDEZ telling him “Sir after the 207th graduates I want to go back to D8. I’m done and I can’t work like this.” Major Hernandez responded at 2040 hours. Plaintiff then immediately responded that she did not want to return to her assignment. She got no response from Major Hernandez via text or email. HERNANDEZ made no effort to respond or address Plaintiff’s text and her concerns. Plaintiff again realized she was being ostracized and ignored and that Lt. VILLAFLORES and other male superiors had free reign to do whatever they wanted.

43. A few days later, Plaintiff was informed that Cpl. HURLEY went to HR to make a complaint about Lt. VILLAFLORES about her not being able to have two females on a recruit class staff. After HURLEY made a complaint, Plaintiff’s division got an email stating that the two Lieutenants were swapping responsibilities and that Lt. VILLAFLORES would now be the Functional LT and Lt. Isaac Imoto would be the Admin LT. When this change occurred, VILLAFLORES at this point should have had nothing to do with FTEP. However, he continued to interject in the program and nobody would stop him from HPD management.

44. Next, while on vacation and out of the country, Mrs. Taflinger was notified by HR that she was a witness for CPL Hurley.

45. **March 31, 2023.** Upon the return from her trip, Plaintiff was still shaken from the 3-8-23 meeting and submitted her TF in person to HR. A copy of the TF was also sent to the City EEO Officer, Denise TSUKIYAMA.

46. Things got progressively worse for Plaintiff and her staff after her TF submission. Mrs. Taflinger and her staff’s overtime was questioned even though it was approved in

the past. Plaintiff and female Sgt. BUGARIN who had the two Recruit classes at the time was getting nitpicked, while the male Sgt. Gamil VELASCO of the 209th class was not getting the same type of treatment. From this point on anything involving Plaintiff's 207th RC staff and her FTEP staff was getting denied and questioned.

47. **April 04, 2023.** Mrs. Taflinger was informed by Cpl. YROJO that Lt. VILLAFLOR was openly saying that people were making bogus complaints about him in an attempt to retaliate and intimidate potential witnesses against him. Lt. VILLAFLOR was already notified about Cpl. HURLEY's complaint.

48. **April 06, 2023.** Mrs. Taflinger brought the behavior by Lt. VILLAFLOR to the attention of the Det. HOTEMA.

49. At this point, Plaintiff found out that she was not the only complainant. Cpl. HURLEY was Complainant 1, Mrs. Taflinger was Complainant 2, Sgt. Angela ZANELLA was 3rd, and Sgt. Jennifer BUGARIN was the 4th. During an investigation of this nature, the accused would have been moved to another Division; however, this did not happen. Lt. VILLAFLOR continued at his post at the Academy and continued with his intimidation and retaliation towards Plaintiff.

50. At the time when Plaintiff made her complaint, her main office was at the backside of Portable B and her 207th RC staff office was attached to classroom C in the administration building. She would split her time between the two offices. When moving from one to the other or anywhere on campus, she felt so uncomfortable that she would have to look outside before exiting the doorway so she would not see either OKAMOTO, VILLAFLOR and/or HERNANDEZ. Keep in mind, that at this point, Major HERNANDEZ still didn't address Plaintiff's text message sent months ago.

51. **April 19, 2023.** informed about Plaintiff's complaints, Capt. OKAMOTO was in the breezeway and openly gave Plaintiff "stink looks" as a means to intimidate her.

52. **April 20, 2023.** Captain Okamoto was questioning Officer Dannan Smith's TA (temp assignment) pay and trying to imply that it was Mrs. Taflinger's fault.

53. **March 31, 2023 - May 11, 2023.** Mrs. Taflinger Plaintiff was emailing Det Hotema about the issues coming up since she felt she was being retaliated against. This was the first ever HR complaint Mrs. Taflinger filed so she was unaware that she had to make a separate TF for retaliation. She did so and submitted it on 5-11-23 to Major Ikehara. **This complaint is on file** and was made against Lt. VILLAFLOR, then Captain Paul OKAMOTO and Major Manuel HERNANDEZ **and we strongly encourage you to peruse it.**

54. **Plaintiff informed Major Ikehara of the following:**

"This To/From is being submitted to inform you of retaliatory actions done by Lieutenant Bienvenido VILLAFLOR, Captain Paul OKAMOTO and Major Manuel HERNANDEZ. I have experienced retaliatory action on numerous occasions since the inception of my original To/From that was hand delivered to Lieutenant Garret. NISHIKAWA on March 28, 2023 at 1100 hours.

On May 10, 2023, at about 0731 hours, I received an emailed from Lieutenant Rommel BAYSA inquiring as to whether or not I had completed the CID Investigative Awareness Program. After informing him that I had completed the program in 2017, I contacted him via his officer number (808-723-8554) at about 0735 hours. I was then informed by Lieutenant BAYSA, that I would be returning to District 8 Patrol on June 25, 2023. I informed Lieutenant BAYSA that I had not received any prior notification of this move from the Training Command.

On May 10, 2023, after speaking with Lieutenant BAYSA, I proceeded to the Main Police Station, located at 801 South Beretania Street, for a follow-up interview with Detective Kevin HOTEMA, in regard to a complaint that I previously filed involving Lieutenant VILLAFLOR. During this meeting with Detective HOTEMA, I informed him of the information I received from Lieutenant BAYSA. I informed Detective HOTEMA that I felt this movement was retaliatory in nature.

On May 10, 2023, at about 1350 hours, I asked Lieutenant Isaac IMOTO to accompany me to Major HERNANDEZ's officer in regard to the information I was given stating that I would be returning to District 8. Major HERNANDEZ confirmed that I would be returning and initially stated that the Lieutenant, but quickly changed and stated "Oh I mean the Captain" was reevaluating all of the people currently on Special Assignment to the Training Academy.

Checks of this information revealed that I was the only Special Assignment personnel leaving the Training Academy. In speaking with the Training Division PTNA clerk Kanoe KANESHIRO, she related that Captain OKAMOTO asked her when was the best time to have personnel on Special Assignment come to the Training Academy June.

This inquiry contradicts the information given by Major HERNANDEZ. I feel as though this change in my work conditions is a direct result of the complaint I made to HRD and is therefore retaliatory in nature.

I was initially assigned to the Training Academy on Special Assignment to assist with the six (6) recruit classes a year, however, I was also given the responsibility of taking over the Field Training Evaluation Program upon Sergeant Dwayne ESPINUEVA's retirement, which occurred on August 8, 2023.

Since I filed my complaint, I have felt that Lieutenant VILLAFLOR, Captain OKAMOTO, and Major HERNANDEZ, have gone out of their way to either ignore me or attempt to prove that I am incapable of adequately performing and fulfilling my current job requirements. I have held the position of Class Sergeant for the 207th Recruit class since December 5, 2023 as well as the FTEP Sergeant.

On April 14, 2023, I received an email regarding a FTEP Survey. This email was forwarded to me, as well as, other Administrative Sergeants (see attached). This email was from Captain OKAMOTO and it detailed specific questions in regard to the program. Being the current FTEP Sergeant, I expressed my willingness to be of any help to Captain OKAMOTO regarding FTEP when he was initially transferred to the Training Academy. I found this email somewhat alarming, as I had been previously assigned to the Training Academy, and I had never seen any detail subjected to a survey prior to this. The command has continued exclude me or value my opinion when it comes to the FTEP. I felt as though the presentation was somewhat biased, retaliatory, and sabotaging.

On March 8, 2023, the Administrative Sergeants were sent an email from Lieutenant VILLAFLOR, stating that all overtime will be temporarily frozen (see attached). At the start of the 207th Recruit Class, I was initially given a budget of thirty (30) hours. Excels were scheduled on March 9, 2023, based on this overtime. We were given no direction as to how to proceed with the scheduled training. The other Class Sergeants then made up their own operational plan that I then copied. Soon after a standard template was adopted moving forward.

Unlike the other Training units, the FTEP unit has been the only unit that has to constantly adjust their schedules. The FTEP unit coordinates with patrol daily, for all watches, and a lot is done on our own time, but we choose not to submit overtime due to the fact that we care more about the program running efficiently instead of being paid overtime. Any overtime submitted for assignments performed off duty are initially scrutinized, but subsequently approved in accordance with Union Contract agreements.

Officer Dannan SMITH is currently assigned to my FTEP unit and the 207th Class Staff. The week of April 17, 2023, Officer SMITH was required to teach Traffic Laws to the 208th Recruit Class (all week). During this time, the 207th Recruit Class was in splits, and the 206th Recruit Class had FTEP Orientation, to which Officer SMITH was also scheduled. He was instructed that he had to choose between what task he wanted to stick with. Officer SMITH remained with the 207th Recruit Class tasks and if the times overlapped, would help the rest of the unit with the FTEP Orientation for the 206th Recruit Class. During the same week, the Taser unit was allowed to claim overtime as they were tasked with teaching Annual Recall Training and the 207th Recruit Class and not required to choose between the two. I find it disheartening that the male Sergeants on campus are not being scrutinized or having to make adjustments like myself, a female Sergeant, or anyone who is directly associated with me and my unit.

On April 10, 2023, received an email from Lieutenant IMOTO, in regard to the 207th graduation location (see attached). He was informed of the actions taken regarding the graduation locations. I Officer SMITH assigned to secure the graduation location for the 207th Recruit Class according to the procurement process and Castle High School was the chosen location. It was not our first choice but the only choice based on availability and pricing. The 206th Recruit Class graduation was held at Kamehameha Schools. I am not an Alumni so my request would not be easily approved, however, I contacted retired Major SANTOS who is currently employed by Kamehameha Schools and inquired if June 16, 2023 was available. I was initially told that this date was available and related this information to Lieutenant IMOTO. On May 10, 2023, I was then instructed to move forward with Kamehameha Schools. I understand that this is the preferred location, but we had confirmed with Castle High School, and as of today's date, I have received not response from Kamehameha Schools. We have not been given a reason as why the command is unwilling to have the graduation at Castle High School.

On April 14, 2023, I was informed that during a meeting between Lieutenant IMOTO, Lieutenant VILLAFLO, and Captain OKAMOTO, Lieutenant VILLAFLO discussed the a sexual relationship rumor regarding Sergeant Aisha ROMERO, a Female Field Training Sergeant. During this meeting, Lieutenant IMOTO informed Lieutenant VILLAFLO that his comments were inappropriate. On April 26, 2023, I provided this information, via email, to Detective HOTEMA. I find it very disturbing that after complaints have been, Lieutenant VILLAFLO refuses to change the way he continues degrade, devalue, and disrespect women.

From what I understand, District 1, 3rd Watch officers, have stated to others that I am currently under investigation for training and internal conflict. The verbiage being used is similar to that I have known to be similarly used by Lieutenant VILLAFLO. I have not been informed of any such investigation and the spreading of this information is retaliatory in nature.

On April 19, 2023, Corporal Blaine ARAKAKI submitted a Transition Report, via To/From, to Captain OKAMOTO and Major HERNANDEZ, in regard to the FTEP unit. The report described the current assignments and future plans and directions of the program. The To/From has been signed by Lieutenant IMOTO but as of this date, I have received no feedback or response from Major HERNANDEZ or Captain OKAMOTO. I feel as though the actions of the command are

retaliatory in nature by choosing alienate me and the FTEP unit or refusing to communicate with me (see attached to from).”

55. Despite this detailed complaint, HPD once again did nothing to protect Plaintiff or correct the potential misconduct of its administrators.

56. **May 30, 2023.** Mrs. Taflinger participated in the Training Division PT assessment. She was there only on SA (Special Assignment) and she wanted to be there permanently like everyone else so she put her name in the hat to take the test. Before signing up, Plaintiff emailed both Det Hotema and Captain Bode about not wanting any of the three men listed in her retaliatory complaint in the gym when she was taking her physical test. This physical test was posted on HPD’s department intranet and it had hard deadlines to submit anything that was requested regarding the paperwork. When the day of the test came, Lt. Villaflor was not there, however, Capt. Okamoto and Major Hernandez were there throwing intimidating glances Plaintiff’s way which made Plaintiff uncomfortable.

57. Before the PT exam started, a male Sgt. Anson “Kaipo” Paiva entered the gym to work out and was made aware that the gym was closed for the exam. However, in another example of gender preferential treatment for males, Capt. Okamoto allowed Sgt. Paiva, with 7 minutes to spare, wrote an email stating that he wanted to participate and when he did that, he was allowed to take the test even though the official deadline had already passed. Mrs. Taflinger was the only Sergeant who put in to the division and Capt. OKAMOTO deliberately went against a rule to make all attempts to block Plaintiff from possibly coming into the division permanently as a Sergeant. Despite the ongoing complaint and hostile environment, Plaintiff’s desire to remain at the Academy was for the training hours that allowed her to be a mother to her sick daughter and be there for her family.

58. **June 23, 2023.** Sgt. Angela Zanella informed Mrs. Taflinger that Lt. VILLAFLORES called her after the meeting on 3-8-23 where Plaintiff was harassed by Lt. Villaflores and Capt. Okamoto. Lt. Villaflores bragged to Sgt. Zanella that he made Plaintiff feel like “shit and stupid” during this meeting.

59. **June 12, 2023.** Michael KAHIKINA, SHOPO Business Agent, informed Plaintiff that he was notified by CPL HURLEY about all the complaints made about Lt. VILLAFLORES and the retaliatory conduct that continued to go on with Plaintiff’s situation along with the other females listed throughout. KAHIKINA made attempts to speak to the 4th floor Administrative Command and subsequently failed.

60. **June 15, 2023.** Mrs. Taflinger had her 207th RC Chiefs Inspection and Deputy Chief RADE VANIC pulled her to the side to ask her what was going on, Plaintiff started to tear up trying to explain what was going on and he tapped her on the shoulder and said, “Just hang in there and let us figure it out.” However, that was a huge letdown as she was later notified by KAHIKINA that HPD intended to move Plaintiff out of her current Special Assignment and send her back to District 8.

61. **June 22, 2023.** Mrs. Taflinger was informed by her FTEP staff that Sgt. Oscar WILLIS was going to take over the FTEP program. Plaintiff was dumbfounded that such a high liability position was being taken over by someone who was not qualified, not certified, and was never a Field Training Officer or Field training Sergeant ever in his career. Plaintiff was being replaced. Sgt. WILLIS was a friend of the command and he steered clear of Plaintiff till her departure back to D8 completely ignoring her. Sgt. WILLIS ignoring Plaintiff was especially suspect considering that a common practice when there is change in leadership would be the predecessor would get the incoming up to speed with what was going on. However, this didn’t occur in Plaintiff’s

case and instead she had subordinates such as Officer Dannan Smith and Corporal Blane Arakaki ordered to help Sgt. Willis in this task as it clearly should have been the responsibility of Plaintiff. This is just another example of HPD management attempting to isolate and ostracize Plaintiff because of her whistleblowing activities.

62. Moreover, Plaintiff's removal from her special assignment position at the academy is particularly suspect as she was performing well and desired on a long-term assignment and her replacement was a male with lesser experience. Plaintiff was the better employee for that position and HPD went with a male who had less experience.

63. **June 25, 2023.** Mrs. Taflinger reported to her new assignment.

64. From about January 2023 to June 2023, Mrs. Taflinger lost out on OT and Special Duty due to the stress she had experienced as described above. Going back to patrol took Plaintiff out of a better work schedule for her family. Plaintiff has a daughter who has a medical condition and the training schedule allowed Plaintiff to be there for her daughter. However, due to HPD's retaliation and discrimination, Plaintiff now works in patrol on night watch. It is taking her away from her family and has put her in a much less desirable assignment.

65. **June 29, 2023.** Mrs. Taflinger submitted a TF to HR to rescind her transfer request to the Training Division. It was denied stating that it was past the deadline and therefore her request was denied. Major Raynar IKEHARA, who knew of retaliation directed towards Plaintiff denied her request.

66. **July 12, 2023.** Mrs. Taflinger was told by several of her former recruits that she trained that officers who graduated from her 207th Recruit Class were having a hard time and not just with the normal things recruits have issues with but were not given a fair chance because they came from PLAINTIFF'S Recruit class.

67. **Despite all of the above, the most shocking retaliation was still yet to happen.**

68. **July 13, 2023.** Mrs. Taflinger was informed by Corp. HURLEY that PSO was at the academy taking away all and any computers that Plaintiff or any of her FTEP staff signed on. She was then notified by Major Gail Beckley of District 8 to report to the Kapolei Station and meet with PSO. Upon arriving in the D8 squad room, Plaintiff was informed that she was being accused of Criminal Tampering with Government Documents. She was later notified via email that she was a person of interest in the Criminal Tampering with government documents. **Plaintiff later found out that it was Captain OKAMOTO who initiated this retaliatory complaint.** It was later deemed that there was not enough evidence to move forward and Plaintiff was also notified of PSO disposition dismissing this complaint. This confirms that OKAMOTO's complaint was retaliatory and made by Capt. OKAMOTO to retaliate against Plaintiff.

69. **September 09, 2023.** Mrs. Taflinger was asked by Sgt. BUGARIN about any attorney recommendations. In that conversation, she vaguely related that she needs to write a TF regarding Recruit Donavyn FUTA (now FONTES) feeling uncomfortable. Sgt BUGARIN didn't expound on it as she couldn't but she did relate that she notified Capt. OKAMOTO who told her to write a TF. About a week after this conversation, Lt. VILLAFLOR was removed from the training Division as FUTA incident was the 5th Complaint!

70. As a result of the above-described retaliation and discrimination, Plaintiff now regularly sees a therapist for the horrific mental stress and trauma she experienced at the hands of her supervisory HPD's officers. Because of her whistleblowing activities, she has experienced extreme sexual and other harassment and bullying by HPD management creating a hostile workplace that no reasonable person would put up with.

71. At the hands of the above-named Defendants, Plaintiff was denied **overtime, promotion to a better assignment, she experienced intimidation and harassment and she was isolated and ostracized AND EVEN FALSELY ACCUSED OF a CRIME SHE DID NOT COMMIT.**

72. Lt. VILLAFLO, Captain OKAMOTO and Major Manuel HERNANDEZ, as described above, engaged in conspiracy to discriminate, aid and abet such discrimination and conspiracy to retaliate and invent fake criminal allegations against Plaintiff in an ultimate act of retaliation.

73. Plaintiff has suffered significant damages (physical, mental and economic) she incurred due to the ongoing abuse, discrimination, retaliation and sexual harassment that she has suffered at the hands of Defendants.

74. All of the named above Defendants' actions have caused Plaintiff millions of dollars in general and special damages. Plaintiff was victim of Defendants' conspiracy to retaliate by inventing a fake criminal prosecution and defamation, among others.

75. Due to the all of the above-named Defendants' actions, Plaintiff has suffered also severe emotional distress, mental trauma and mental illness and many other special and general damages as proven at trial.

76. All of the named above Defendants' above-described actions (retaliation, defamation, sex and gender discrimination and sexual harassment) have caused Plaintiff a severe mental illness that is manifesting itself in Plaintiff's daily severe stress levels, anxiety, insomnia, increased heart rate and depression.

V. CAUSES OF ACTIONS

COUNT I: NEGLIGENT SUPERVISION
(AGAINST DEFENDANTS C&C AND HPD)

77. Plaintiff reiterates and incorporates by reference the preceding paragraphs of this Complaint.

78. As set forth above, Defendants C&C AND HPD and/or their employees, agents and/or representatives had a duty of care to Plaintiff in making sure that all of the above-named individual Defendants were properly supervised and managed in exercising and using their C&C AND HPD's power and authority when performing their job and duties for C&C AND HPD.

79. As set forth above, Defendants C&C AND HPD and/or their employees, agents and/or representatives knew and/or were aware that all of the above-named individual Defendants were abusing, misusing and were negligent in performance of their official duties and Defendants C&C AND HPD did nothing to correct or prevent this behavior by of the above-named individual Defendants.

80. Defendants C&C AND HPD and/or their employees, agents and/or representatives breached their duties of care to Plaintiff.

81. As a direct, proximate and legal cause of the negligence, gross negligence or recklessness of Defendants C&C AND HPD and/or their employees, agents and/or representatives, Plaintiff sustained the special and general damages described herein in the amount to be proven and shown at trial.

82. All of the named above Defendants' above-described actions have caused Plaintiff a severe emotional stress, mental illness and trauma that is manifesting itself in Plaintiff's daily severe stress levels, anxiety, insomnia, increased heart rate and depression.

83. Plaintiff was damaged in an amount to be proven at trial.

**COUNT II: VIOLATION OF HRS 378, PART V, WHISTLEBLOWERS' PROTECTION
ACT**
(AGAINST ALL DEFENDANTS)

84. Plaintiff reiterates and incorporates by reference the preceding paragraphs of this Complaint.

85. As set forth above, Defendants' treatment of Plaintiff, evidences retaliation and conspiracy to commit retaliation against Plaintiff for reporting illegal practices as committed by all defendants.

86. An employer shall not retaliate against an employee based on their whistleblowing under HRS § 378-62 which states in pertinent part as follows:

§ 378-62: An employer shall not discharge, threaten or otherwise discriminate against an employee...because:

- (1) The employee... reports or is about to report to the employer...verbally or in writing, a violation or suspected violation of:
 - (A) A law, rule, ordinance, or regulation, adopted pursuant to the law of this State, a political subdivision of the State or the United States;

87. As set forth above, Defendants' conduct as described above is a violation of HRS § 378-62(1)(A).

88. These aforementioned acts and/or conduct of Defendants entitle Plaintiff to damages as provided by law. As a direct and proximate result of said unlawful employment practices, Plaintiff has suffered extreme mental anguish, outrage, depression, great humiliation, severe anxiety about her future and her ability to support himself, as well as painful embarrassment among her relatives and friends, damage to her good reputation, disruption of her personal life, loss of enjoyment of the ordinary pleasures of everyday life and other general damages in an amount which meets the minimal jurisdictional limits of this Court.

89. Plaintiff was damaged in an amount to be proven at trial.

COUNT III: VIOLATION OF PUBLIC POLICY
(AGAINST ALL DEFENDANTS)

90. Plaintiff reiterates and incorporates by reference the preceding paragraphs of this Complaint.

91. Retaliation and discrimination against Plaintiffs as described herein is actionable in tort and constitutes a violation of clear mandates of public policies, pursuant to *Parnar v. Americana Hotels*, 65 Haw. 370 (1982), including but not limited to the following:

- a. Conspiracy to file false criminal charges against Plaintiff
- b. defamation
- c. conspiracy to retaliate and defame by filing false criminal charges against Plaintiff

92. These aforementioned acts and/or conduct of Defendants entitle Plaintiff to damages as provided by law. As a direct and proximate result of said unlawful employment practices, Plaintiff has suffered extreme mental anguish, outrage, depression, great humiliation, severe anxiety about her future and her ability to support himself, as well as painful embarrassment among her relatives and friends, damage to her good reputation, disruption of her personal life, loss of enjoyment of the ordinary pleasures of everyday life and other general damages in an amount which meets the minimal jurisdictional limits of this Court.

93. Plaintiff was damaged in an amount to be proven at trial.

COUNT IV: VIOLATION OF HRS 378-2
(AGAINST ALL DEFENDANTS)

94. Plaintiff reiterates and incorporates by reference the preceding paragraphs of this Complaint.

95. All of the Defendants were motivated by their sex and gender bias against the Plaintiff when they took actions as described above against Plaintiff and committed their above-described misconduct.

96. Plaintiff was also sexually harassed as described above.

97. Defendants violated HRS 378-2 by not preventing individual Defendants and Plaintiff's supervisors from unwelcomed, severe, continuing and pervasive discrimination and harassment based on sex and gender and sexual harassment of Plaintiff based on Plaintiff's sex and gender and retaliating against Plaintiff after Plaintiff complained about such discriminatory treatment and after Plaintiff being a whistleblower as set forth above.

98. All Individual above named Defendants aided and abetted above-described discrimination.

99. Sexual harassment and gender and sex discrimination were especially severe and pervasive after each time Plaintiff complained about Defendants' illegal activities.

100. Despite Plaintiff's complaints to Defendants' leadership and supervisors, nothing was done to rectify this discriminatory harassment.

101. As a direct, proximate and legal cause of Defendants' discrimination, Plaintiff sustained the special and general damages described herein in the amount to be proven and shown at trial.

102. Plaintiff was damaged in an amount to be proven at trial.

COUNT V: CIVIL CONSPIRACY TO RETALIATE, MAKE FALSE CRIMINAL ALLEGATIONS AND REPORTS AND DEFAME
(AGAINST ALL DEFENDANTS)

103. Plaintiff reiterates and incorporates by reference the preceding paragraphs

of this Complaint.

104. As set forth above, all Defendants conspired to defame, make false criminal allegations and reports and retaliate against Plaintiff in order to illegally remove Plaintiff from her HPD employment and take away her freedom because she dared complained and report about Defendants' illegal activities and practices.

105. These aforementioned acts and/or conduct of Defendants entitle Plaintiff to damages as provided by law. As a direct and proximate result of said conspiracy by Defendants, Plaintiff has suffered extreme mental anguish, outrage, depression, great humiliation, severe anxiety about her future and her ability to support himself, as well as painful embarrassment among her relatives and friends, damage to her good reputation, disruption of her personal life, loss of enjoyment of the ordinary pleasures of everyday life and other general damages in an amount which meets the minimal jurisdictional limits of this Court.

106. As a direct, proximate and legal cause of this conspiracy committed by all of the Defendants, Plaintiff sustained the special and general damages described herein in the amount to be proven and shown at trial.

107. Plaintiff was damaged in an amount to be proven at trial.

COUNT VI: DEFAMATION
(AGAINST ALL DEFENDANTS)

108. Plaintiff reiterates and incorporates by reference the preceding paragraphs of this Complaint.

109. As set forth above, Defendants defamed Plaintiff with their above-described actions.

110. Defendants, as described above, knowingly made false charges against Plaintiff to HPD and Plaintiff's employer fully knowing allegations and factual claims they made in these written complaints were false.

111. As a result, Defendants have defamed Plaintiff and permanently ruined her reputation. Defendants, in conspiracy with each other, have basically assassinated Plaintiff's character with their above-described actions.

112. Defendants' assassination of Plaintiff's character with her employer HPD has caused permanent damage to Plaintiff.

113. As a direct, proximate and legal cause of this defamation, committed by the Defendants, Plaintiff sustained the special and general damages described herein in the amount to be proven and shown at trial.

114. Plaintiff was damaged in an amount to be proven at trial.

COUNT VII: NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
(AGAINST ALL DEFENDANTS)

115. Plaintiff reiterates and incorporates by reference the preceding paragraphs of this Complaint.

116. As set forth above, the acts, conduct and/or omissions of Defendants and/or their employees, agents and/or representatives were negligent, reckless and outrageous.

117. As a result, Plaintiff has suffered extreme emotional distress and mental illness, as a direct result of Defendants' actions.

118. As a direct, proximate and legal cause of the negligence, gross negligence or recklessness of Defendants and/or their employees, agents and/or representatives, Plaintiff

sustained the extreme emotional distress and other special and general damages described herein in the amount to be proven and shown at trial.

119. Plaintiff has further suffered significant emotional, physical and mental injuries as a result of Defendants' above-described actions.

120. All of the named above Defendants' above-described actions have caused Plaintiff a severe mental illness that is manifesting itself in Plaintiff's daily severe stress levels, anxiety, insomnia, increased heart rate and depression.

121. Plaintiffs was damaged in an amount to be proven at trial.

COUNT VIII: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(AGAINST ALL DEFENDANTS)

122. Plaintiff reiterates and incorporates by reference the preceding paragraphs of this Complaint.

123. As set forth above, the acts, conduct and/or omissions of Defendants and/or their employees, agents and/or representatives were intentional, reckless and outrageous.

124. As a result, Plaintiff has suffered extreme emotional distress, as a direct result of Defendants' actions.

125. Plaintiff has further suffered significant emotional, physical and mental injuries as a result of Defendants' above-described actions.

126. As a direct, proximate and legal cause of the intentional and reckless acts of Defendants and/or their employees, agents and/or representatives as described above, Plaintiff sustained the extreme emotional distress and other special and general damages described herein in the amount to be proven and shown at trial.

127. All of the named above Defendants' above-described actions have caused Plaintiff a severe mental illness that is manifesting itself in Plaintiff's daily severe stress levels, anxiety, insomnia, increased heart rate and depression.

128. Plaintiffs was damaged in an amount to be proven at trial.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays that this Court enter judgment granting the following relief on all causes of action as follows:

- A. On all Counts against ALL Defendants;
- B. For an award of special, economic, consequential and general damages to Plaintiff from ALL Defendants, jointly and severally, in amount proven at trial;
- C. Punitive damages, as the facts aforesaid constitute extreme and outrageous behavior which exceeds all bounds usually tolerated by decent society. In committing the above acts and omissions, Defendants acted wantonly and/or oppressively and/or with such malice as implies a spirit of mischief or criminal indifference to civil obligations and/or there has been some willful misconduct that demonstrates that entire want of care which would raise the presumption of a conscious indifference to consequences, justifying an award of punitive or exemplary damages in an amount to be proven at trial;
- D. That this Court enter a declaratory judgment that Defendants have violated the rights of Plaintiff;
- E. That this Court award Plaintiff compensatory damages, proximately caused by Defendants' tortious and abusive conduct, including, but not limited to,

general damages for intentional and negligent infliction of mental and/or emotional distress, assessed against all Defendants, all in an amount to be proven at trial;

- F. That this Court award Plaintiff reasonable attorney's fees and costs of suit herein as well as prejudgment and post-judgment interest;
- G. That this Court order appropriate injunctive relief.
- H. That this Court retain jurisdiction over this action until the Defendants have fully complied with the order of this Court and that this Court require the Defendants to file such reports as may be necessary to secure compliance;
- I. That this Court award Plaintiff such other and further relief both legal and equitable as this Court deems just, necessary and proper under the circumstances.

DATED: Honolulu, Hawaii; August 16, 2024.

/S/ BOSKO PETRICEVIC
BOSKO PETRICEVIC, ATTORNEY AT LAW LLLC

ATTORNEY FOR PLAINTIFF
SHERI TAFLINGER

ATTORNEY FOR PLAINTIFF
SHERI TAFLINGER

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT
STATE OF HAWAII

SHERI TAFLINGER,	)	CIVIL NO.
	)	(Other Civil Action)
Plaintiff,	)	
vs.	)	
	)	
CITY AND COUNTY OF HONOLULU;	)	
HONOLULU POLICE DEPARTMENT	)	SUMMONS
(“HPD”); HPD OFFICER LT.	)	
BIENVENIDO VILLAFLOR II., in his	)	
individual capacity; HPD OFFICER	)	
MAJOR PAUL OKAMOTO, in his	)	
individual capacity; HPD OFFICER	)	
MAJOR MANUEL HERNANDEZ III, in	)	
his individual capacity; DOE PERSONS 1-10;	)	
DOE CORPORATIONS and	)	
PARTNERSHIPS 1-10; ROE “NON-	)	
PROFIT” CORPORATIONS 1-10; DOE	)	
UNINCORPORATED ORGANIZATIONS	)	
1-10; and ROE GOVERNMENTAL	)	
ENTITIES 1-10,	)	
Defendants.		

AMENDED SUMMONS

STATE OF HAWAII:

To the above-named following Defendants:

1. **CITY AND COUNTY OF HONOLULU**
2. **HONOLULU POLICE DEPARTMENT (“HPD”);**
3. **HPD OFFICER LT. BIENVENIDO VILLAFLOR II.,** in his individual capacity;
4. **HPD OFFICER MAJOR PAUL OKAMOTO,** in his individual capacity;
5. **HPD OFFICER MAJOR MANUEL HERNANDEZ III,** in his individual capacity

You are hereby summoned and required to file with the Court and serve BOSKO PETRICEVIC, ATTORNEY AT LAW LLLC, whose address is P.O. Box 38, Honolulu, Hawaii, 96810, with an email address of boskolaw@gmail.com, an answer to the Third Amended Complaint herewith served upon you, within twenty (20) days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the Complaint.

This summons shall not be personally delivered between 10:00 p.m. and 6:00 a.m. on premises not open to the general public, unless a judge of the above-entitled court permits, in writing on this summons,

personal delivery during those hours.

A failure to obey this summons may result in an entry of default and default judgment against the disobeying person or party.

DATED: Honolulu, Hawaii, _____.

CLERK OF THE ABOVE-ENTITLED COURT

IN