

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

Second Appellate District, Division One

ALKIVIADES DAVID, et al., Appellants

v.

JANE DOE, Respondent

Case Nos.: B341119 (consolidated with B345361)

Trial Court No.: 20STCV37498

APPELLANT'S SUPPLEMENTAL BRIEF

ADA VIOLATIONS, COERCIVE MEDICALIZATION, AND STRUCTURAL ERROR

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I. INTRODUCTION

This supplemental brief addresses violations of the Americans with Disabilities Act (ADA), coercive medicalization, and resulting structural error affecting the fairness of proceedings.

II. DISABILITY STATUS

Appellant suffers from a documented neurological condition protected under the ADA, entitling him to reasonable accommodation in judicial proceedings.

III. DENIAL OF ADA ACCOMMODATION

Appellant's service animal, Vader, was excluded based on unsupported allegations, denying necessary accommodation and impairing Appellant's participation.

IV. COERCIVE MEDICALIZATION

A psychiatric treatment plan proposed pharmacological intervention. Appellant refused medication, exercising constitutional rights. Efforts to characterize Appellant as unstable were used in lieu of providing lawful accommodation.

V. CUSTODIAL VIOLATIONS

During detention, Appellant was subjected to attempts to administer psychiatric medication without court order or due process, which he refused.

VI. STRUCTURAL ERROR AND PREJUDICE

The combined effect of removing ADA accommodation, pressuring medication, and custodial conduct created structural error. These actions impacted Appellant's ability to participate and resulted in prejudice.

VII. LEGAL AUTHORITIES

Relevant authorities include ADA Title II (42 U.S.C. §12132), *Riggins v. Nevada*, *Washington v. Harper*, and *Sell v. United States*.

VIII. CONCLUSION AND RELIEF

Appellant respectfully requests reversal or vacatur and remand for proceedings consistent with ADA protections and constitutional standards.

Dated: 2026

Respectfully submitted,

Alkiviades David (In Pro Per)