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FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE

JUN 02 2026

DAVID H. YAMASAKI, Clerk of the Court

BY: _____, DEPUTY

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF ORANGE – UNLIMITED JURISDICTION**

13 **30-2026**

14 In Re the Matter of:

Case No.: **01574330**

16 JACK TOROSSIAN, an individual;
17 Plaintiff;

Judge: *Mc Cormick*
Complaint Filed:

18 V.

COMPLAINT FOR DAMAGES
DEMAND FOR JURY TRIAL

19 **GKN AEROSPACE TRANSPARENCY**
20 **SYSTEMS INC.; DOES 1–100, inclusive,**
21 **Defendants.**

22 Defendant(s).

24 **INTRODUCTION**

- 25
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27 1. Plaintiff brings this action arising out of a dangerous chemical incident originating from
28 Defendants' aerospace manufacturing facility located in Garden Grove, California.

2. Beginning on or about May 21, 2026, Defendants' industrial storage tank containing thousands of gallons of methyl methacrylate ("MMA"), a highly volatile and flammable chemical, overheated, vented toxic vapors, and posed an imminent risk of catastrophic explosion or release into surrounding residential communities.
3. As a direct result of Defendants' conduct, tens of thousands of Orange County residents were ordered to evacuate their homes, businesses, and schools.
4. Plaintiff suffered damages including evacuation expenses, loss of use of property, emotional distress, exposure concerns relating to toxic chemicals, disruption of employment and daily activities, and other economic and non-economic damages.
5. Defendants knew or should have known that storing large quantities of volatile industrial chemicals in densely populated urban areas created an unreasonable risk of catastrophic harm if proper safety systems, maintenance, monitoring, and containment procedures were not implemented.
6. Government agencies and emergency responders publicly described the incident as potentially catastrophic and requiring emergency declarations and large-scale evacuations.

PARTIES

7. Plaintiff is an individual residing in Cypress, Orange County, California, and was within the evacuation and/or danger zone affected by Defendants' chemical emergency.

- 1 8. Defendant GKN Aerospace Transparency Systems Inc. is a corporation authorized to do
2 business in California and operates the facility located at or near 12122 Western Avenue.
3 Garden Grove, California.
4
5 9. Plaintiff is unaware of the true names and capacities of Defendants sued herein as DOES 1–
6 100 and therefore sues said Defendants fictitiously. Plaintiff will amend this Complaint when
7 the true names and capacities are ascertained.
8
9

10 **JURISDICTION AND VENUE**

11

- 12 10. Jurisdiction is proper in this Court because the acts complained of occurred within Orange
13 County, California.
14
15 11. Venue is proper pursuant to California Code of Civil Procedure section 395 because
16 Defendants conduct business in Orange County and the injuries occurred therein.
17

18 **FACTUAL ALLEGATIONS**

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- 20 12. Defendants stored large quantities of methyl methacrylate (“MMA”) at their Garden Grove
21 aerospace manufacturing facility.
22
23 13. MMA is a highly flammable industrial chemical known to present risks of toxic vapor release,
24 combustion, explosion, respiratory injury, and environmental contamination if improperly
25 handled or stored.
26
27 14. On or about May 21, 2026, Defendants’ storage tank began overheating and venting vapors.
28

- 1 15. Public officials reported that pressure relief systems and associated safety mechanisms were
2 damaged or malfunctioning, preventing proper mitigation of the emergency.
- 3 16. Emergency responders publicly warned that the tank could rupture or explode
4 catastrophically.
- 5 17. The Governor of California declared a state of emergency in response to the incident.
- 6 18. Evacuation orders impacted residents in Garden Grove and surrounding Orange County
7 communities.
- 8 19. The Orange County District Attorney publicly announced an investigation into Defendants'
9 conduct concerning the chemical emergency.
- 10 20. Defendants failed to adequately inspect, maintain, supervise, monitor, repair, warn against, or
11 safely operate the chemical storage systems at the facility.
- 12 21. Defendants knew or reasonably should have known that failure of their storage systems would
13 endanger nearby residential communities.
- 14 22. Defendants nevertheless continued operations in conscious disregard of public safety.

20 **FIRST CAUSE OF ACTION**

22 **NEGLIGENCE**

- 23 23. Plaintiff incorporates all prior allegations.
- 24 24. Defendants owed a duty of reasonable care to nearby residents and the public.
- 25 25. Defendants breached that duty by negligently storing, maintaining, monitoring, and handling
26 hazardous chemicals.
- 27
- 28

1 26. Defendants further breached their duties by failing to implement adequate emergency
2 prevention and containment systems.

3 27. As a direct and proximate result, Plaintiff suffered damages.
4

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6 **SECOND CAUSE OF ACTION**
7

8 **NEGLIGENCE PER SE**
9

10 28. Plaintiff incorporates all prior allegations.

11 29. Defendants violated statutes, regulations, fire codes, hazardous materials regulations,
12 environmental regulations, and industrial safety standards intended to protect the public.
13

14 30. Plaintiff belongs to the class of persons intended to be protected by said laws.

15 31. Defendants' violations proximately caused Plaintiff's injuries and damages.
16
17

18 **THIRD CAUSE OF ACTION**
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20 **STRICT LIABILITY — ULTRA-HAZARDOUS ACTIVITY**
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22 32. Plaintiff incorporates all prior allegations.

23 33. Defendants engaged in abnormally dangerous and ultra-hazardous activities by storing
24 massive quantities of volatile industrial chemicals in close proximity to densely populated
25 residential communities.

26 34. Such activities create foreseeable risks of catastrophic injury even when reasonable care is
27 exercised.
28

1 35. Defendants are therefore strictly liable for all resulting harm.

2
3 **FOURTH CAUSE OF ACTION**

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5 **PUBLIC NUISANCE**

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7 36. Plaintiff incorporates all prior allegations.

8 37. Defendants created and maintained a condition harmful to public health and safety.

9 38. Defendants' conduct interfered with Plaintiff's use and enjoyment of property and public
10 spaces.
11

12 39. Plaintiff suffered injuries and damages as a result.
13
14

15 **FIFTH CAUSE OF ACTION**

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17 **TRESPASS**

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19 40. Plaintiff incorporates all prior allegations.

20 41. Toxic vapors, contaminants, particulates, and hazardous substances entered or threatened to
21 enter Plaintiff's property.
22

23 42. Defendants thereby interfered with Plaintiff's possessory rights.
24

25 **SIXTH CAUSE OF ACTION**

26
27 **NEGLIGENCE INFLICTION OF EMOTIONAL DISTRESS**
28

1 43. Plaintiff incorporates all prior allegations.

2 44. Defendants' conduct foreseeably caused Plaintiff severe emotional distress, fear, anxiety,
3 evacuation trauma, and concern regarding toxic exposure and explosion risks.
4

5 45. Plaintiff suffered serious emotional harm as a direct and proximate result of Defendants'
6 conduct.
7

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9 **PUNITIVE DAMAGES ALLEGATIONS**

10 46. Defendants acted with conscious disregard for the safety and rights of surrounding residents.
11

12 47. Defendants knew of the dangerous propensities of methyl methacrylate and the catastrophic
13 consequences associated with storage system failures.
14

15 48. Despite such knowledge, Defendants failed to take adequate corrective measures.
16

17 49. Plaintiff therefore seeks punitive and exemplary damages pursuant to California Civil Code
18 section 3294.
19

20 **PRAYER FOR RELIEF**

21 WHEREFORE, Plaintiff prays for judgment as follows:
22

23 1. For compensatory damages according to proof;

24 2. For medical monitoring damages;

25 3. For evacuation and relocation expenses;

26 4. For loss of use damages;
27
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5. For emotional distress damages;
6. For diminution in property value damages;
7. For punitive damages;
8. For costs of suit;
9. For prejudgment interest;
10. For such other relief as the Court deems proper.

DEMAND FOR JURY TRIAL

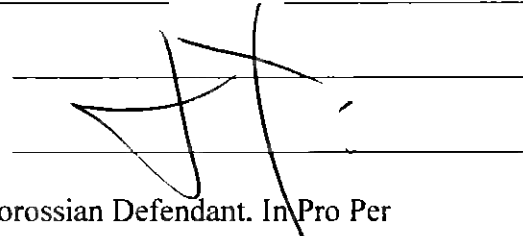
Plaintiff hereby demands trial by jury on all issues so triable.

DATED: 6/1/2026

Jack Torossian - 310.999.7592
Plaintiff, In Pro Per

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: 6/1/2026



Jack Torossian Defendant. In Pro Per