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FILED
Superior Court of California
County Of Los Angeles

JUL 16 2015

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20 GUADALUPE LOPEZ

21 **UNLIMITED JURISDICTION**
22 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
23 **FOR THE COUNTY OF LOS ANGELES**

24 GUADALUPE LOPEZ,

CASE NO. **BC 5 8 8 3 0 2**

25 Plaintiff,

COMPLAINT FOR DAMAGES:

26 vs.

1. RETALIATION IN VIOLATION OF
CALIFORNIA FAIR
EMPLOYMENT AND HOUSING
ACT

27 COUNTY OF LOS ANGELES, a municipal
28 corporation, and DOES 1 through 100,
inclusive,

Defendants.

DEMAND FOR JURY TRIAL

CIT/CASE: BC588302
LEA/DEF#: _____
RECEIVED: _____
DATE PAID: 07/16/15 12:56 PM
PAYMENT: \$435.00 310
RECEIPT #: CCH520872041
CHECK: \$435.00
CASH: \$0.00
CHANGE: \$0.00
CARD: \$0.00

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GENERAL ALLEGATIONS

1
2 1. At all times relevant hereto, GUADALUPE LOPEZ ("Plaintiff") was and is a
3 resident of the County of Riverside, State of California, and at all times relevant hereto,
4 Plaintiff was and is a competent adult.

5 2. At all times relevant hereto, Plaintiff was and is currently a Deputy Sheriff
6 employed by the Los Angeles County Sheriff's Department and has been so employed
7 since July 10, 2003.

8 3. Plaintiff is informed and believes and thereon alleges that, at all times
9 relevant hereto, Defendant Los Angeles County Sheriff's Department ("Defendant" or
10 "Department"), was an entity engaged as a matter of commercial actuality in purposeful
11 economic activity within the County of Los Angeles, State of California and at all times
12 relevant hereto, operated the Los Angeles County Sheriff's Department, which is an
13 administrative agency of Los Angeles County.

14 4. Plaintiff is informed and believes and thereupon alleges that Defendants
15 DOES 1 through 100, inclusive, and each of them, were at all times relevant hereto,
16 residents of the County of Los Angeles, State of California, and were agents, partners,
17 and/or joint venturers of Defendants and/or each other, acting as supervisors, managers,
18 administrators, owners, and/or directors or in some other unknown capacity.

19 5. The true names and capacities of Defendants DOES 1 through 100, and
20 each of them, whether individual, corporate, associate or otherwise, are unknown to
21 Plaintiffs at this time, who therefore sue said Defendants by such fictitious names.
22 Plaintiff will file DOE amendments, and/or ask leave of court to amend this complaint to
23 assert the true names and capacities of these Defendants when they have been
24 ascertained. Plaintiff is informed and believes, and upon such information and belief
25 alleges, that each Defendant herein designated as a DOE was and is in some manner,
26 negligently, wrongfully, or otherwise, responsible and liable to Plaintiff for the injuries and
27 damages hereinafter alleged, and that Plaintiff's damages as herein alleged were
28 proximately caused by their conduct.

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1 6. Plaintiff is informed and believes, and thereupon alleges, that at all times
2 material herein the Defendants, and each of them, were the agents, servants, and
3 employees, or ostensible agents, servants, or employees of each other Defendant, and as
4 such, were acting within the course and scope of said agency and employment or
5 ostensible agency and employment, except on those occasions when Defendants were
6 acting as principals, in which case, said Defendants, and each of them, were negligent in
7 the selection, hiring, and use of the other Defendants.

8 7. Plaintiff is further informed and believes, and there upon alleges, that at all
9 times relevant hereto, Defendants, and each of them, acted in concert and in furtherance
10 of the interests of each other Defendant.

11 8. Plaintiff has complied with and/or exhausted any applicable claims statutes
12 and/or administrative and/or internal remedies and/or grievance procedures, or is excused
13 from complying therewith.

14 **FACTS APPLICABLE TO ALL CAUSES OF ACTION**

15 9. Plaintiff is a Hispanic female sheriff's deputy employed by the Los Angeles
16 County Sheriff's Department. Plaintiff has been subjected to sexual harassment and
17 retaliation by male deputies of the Los Angeles Sheriff's Department ("LASD") as set forth
18 below.

19 10. Plaintiff began her career as a Deputy Sheriff with the Los Angeles Sheriff's
20 Department in 2003. Plaintiff was initially assigned to Los Angeles County Jail. On or
21 about May 19, 2011, Plaintiff transferred to East LA Station (hereinafter "East LA") where
22 Plaintiff began her training to become a patrol officer. Plaintiff was initially trained by Field
23 Training Officer Eric Valdez (hereinafter "FTO Valdez"), whom would eventually become
24 known to Plaintiff as the "Godfather" of East LA.

25 11. During training, Plaintiff was made aware by other female deputies that it
26 was expected of "female" trainees of FTO Valdez to "submit" and provide sexual favors for
27 male training officers and their associates. Plaintiff was made to understand that she was
28 expected to be "One of the Girls" which included drinking, partying, and the fulfillment of

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1 the "sexual needs" of her male training officers and their associates, including, but not
2 limited to, the performance of oral sex.

3 12. Plaintiff was additionally informed many of these deputies were members
4 and associates of an East LA Station clique/gang called the "Banditos," with an estimated
5 membership of 80 sheriff's deputies, notorious for their efforts to exert control over the
6 East LA station, its deputies and operations. The Banditos clique/gang is similar to others
7 currently under investigation by the LASD for activities inconsistent with Department
8 policies and a myriad other misconduct not limited to the treatment of inmates, but also
9 violations of Department policy directed towards other deputies not favored by the
10 Banditos clique/gang.

11 13. Plaintiff was informed and believes that deputies at East LA become
12 tattooed members of the Banditos by earning their way in by performing "initiation task"
13 during the probationary period. Probationers are usually called "Prospects" or "Puppies."
14 Once accepted, new members go through the initiation rituals that require new inductees
15 to obtain a numbered tattoo of a skeleton with a sombrero, bullet sash, and a pistol
16 demonstrating membership in the clique/gang. Posters, pictures, and other items relating
17 to the Banditos are posted throughout the East LA station.

18 14. Plaintiff was subjected to continual unwanted, uninvited, and unwarranted
19 sexual harassment, including sexually derogatory comments, sexual overtures and
20 innuendo from other male deputies at East LA, many of whom were members, prospects
21 or associates of the Banditos. Plaintiff was constantly asked if she wanted to "party" with
22 other male deputies. During this same period, Plaintiff was made aware by Deputy
23 Ortega that there were sexually explicit photos of other female deputies having oral sex
24 with male field training officers and members of the Banditos.

25 15. FTO Valdez systematically delegated Plaintiff's training to other deputies at
26 East LA. During Plaintiff's first two weeks of training, FTO Valdez assigned her to work a
27 shift with Deputy Christopher Wargo. Deputy Wargo was a prospect associate of the
28 Banditos. During the shift, Plaintiff witnessed Deputy Wargo "purchase 12 reports." This

1 apparently meant that Deputy Wargo would take over the responsibility of writing the
2 arrest reports for the arresting deputies as part of his initiation. Deputy Wargo was
3 engaging in the writing of arrest reports that were essentially fabricated. When Plaintiff
4 asked Deputy Wargo what was going on and why the arresting deputies were not writing
5 their own reports, Plaintiff was told that she was a trainee and to mind her own business.

6 16. During her training period, Plaintiff began to experience sexually harassing
7 and intimidating behavior from other male deputies. Plaintiff was constantly asked if she
8 wanted to "party" with associates and members of the "Banditos". Plaintiff was told by
9 Deputy Joshua Smilor (Bandito associate), that, "[She] needed to "submit" to the program
10 of FTO Eric Valdez kids!" Deputy Smilor also told Plaintiff that she was expected to call
11 her FTO Valdez "Daddy." It was made clear to Plaintiff that her ability to complete her
12 probationary period at East LA was dependent upon her compliance and that by failing to
13 submit to the program, Plaintiff's probation could be extended indefinitely.

14 17. In an attempt to further intimidate, humiliate, and apparently educate
15 Plaintiff, Deputy Benjamin Zaredini (Bandito associate), followed Plaintiff into the garage
16 area at East LA, and then he kicked over a garbage can and yelled over to Plaintiff, in
17 front of inmates working in the garage, "Hey trainee, why don't you come over here and
18 clean up the "fucking mess" you made?" One of the inmates whom had witnessed the
19 incident offered to assist Plaintiff in picking up the garbage.

20 18. Plaintiff had no interest in participating in the demeaning, ritualistic traditions
21 and culture of the Banditos and their associates at East LA. Plaintiff made it known that
22 she was not interested in "partying," and that family, career, and education were her
23 priorities. Plaintiff is a well-educated female Deputy Sheriff and having completed her
24 Bachelors and Masters degrees and her first year of law school, Plaintiff was preparing
25 herself for advancement within the Department.

26 19. Approximately halfway through Plaintiff's training she was removed from
27 FTO Valdez as her training officer and, she was assigned to Field Training Officer Edwin
28 Hernandez (Hereinafter FTO Hernandez) for the remainder of her training period.

1 20. It soon became apparent to Plaintiff that FTO Hernandez was not in favor
2 with FTO Valdez or any of FTO Valdez's trainee associates at East LA. It was apparent to
3 Plaintiff that there was a power struggle within the East LA station and those associated
4 with FTO Hernandez were ostracized by members of the group associated with FTO
5 Valdez – primarily consisting of "Bandito" members, probationers, associates and female
6 deputies who associated with the clique/gang, usually considering themselves "One of the
7 Girls" in reference to their association.

8 21. On or about November 2011, Plaintiff was accosted by Deputy Andrew
9 Hernandez, also a known associate of the Banditos, in the hallway just as she was exiting
10 the East LA women's locker room. Deputy Hernandez began leering and pointing down at
11 Plaintiff's breast and said to a second male deputy, "Look at these!" "What do you think
12 bro?" Deputy Hernandez then began taunting Plaintiff by telling her, "What are you going
13 to do about it?" "What are you going to do?" Plaintiff was shocked, frightened, and
14 humiliated by Deputy Hernandez's brazen and sexually inappropriate behavior directed
15 towards her.

16 22. On or about December 23, 2011, Deputy Eduardo Sanchez, (Bandito
17 associate) began cursing at Plaintiff and demanded that Plaintiff "meet up with him."
18 Plaintiff knew the sexual implications of what Deputy Sanchez was asking and informed
19 Deputy Sanchez that she would not meet with him alone. Deputy Sanchez continued to
20 harass Plaintiff and said, "I don't understand why you don't want to meet up, are you
21 worried about your reputation?" Approximately two days later, Plaintiff encountered
22 Deputy Sanchez again at East LA and he again cursed and berated Plaintiff because she
23 would not "meet up" alone with him.

24 23. In late December 2011, Plaintiff was given a priority call. Deputy
25 Christopher Wargo (Bandito associate) became enraged by how Plaintiff handled the call.
26 Deputy Wargo drove to the location of Plaintiff's call and blocked Plaintiff's patrol car so
27 she could not move the vehicle. Deputy Wargo ordered Plaintiff to park across from the
28 location of the call. Deputy Wargo then ordered Plaintiff out of her patrol car and took

1 Plaintiff to the rear of the car where he leaned over her and began screaming and
2 admonishing Plaintiff. Aware of Deputy Wargo's capacity for violence, Plaintiff feared for
3 her safety. As Plaintiff tried to move around Deputy Wargo in order to reenter her patrol
4 car, Deputy Wargo blocked her movement, and in a very threatening and aggressive
5 manner Deputy Wargo told Plaintiff, "You are a product of Valdez (FTO Valdez), and he is
6 a "God" at East LA Station, and if you don't "submit" to the program, you "will" have
7 problems here!"

8 24. On or about January 2012, Plaintiff again encountered Deputy Andrew
9 Hernandez (Bandito associate) while servicing a call. Deputy Hernandez began cursing
10 at Plaintiff while she was interviewing a crime victim. At the end of the call, Deputy
11 Hernandez followed Plaintiff to her patrol car and slammed his hands down on the driver's
12 side door and said to Plaintiff, "What the fuck is wrong with you?" "You meet up with us
13 when we tell you to!" When Plaintiff did not provide a sufficient answer, Deputy
14 Hernandez yelled at Plaintiff, "Fuck you!" "You are on your own!" The aggressive and
15 demeaning treatment of Plaintiff continued to escalate from verbal threats to actual
16 physical violence against her.

17 25. On or about January 16, 2012, Deputy Zaredini (Bandito associate) and
18 Plaintiff crossed paths at East LA station in the hallway just outside the Watch Duty's
19 door. Plaintiff was carrying a "loaded shotgun" and Deputy Zaredini approached Plaintiff,
20 dipped his shoulder, and attempted to knock Plaintiff to the ground. So violent and
21 deliberate was the collision initiated by Deputy Zaredini that Plaintiff fell backwards into
22 the wall, while still trying to maintain control of the shotgun, and hit the back of her head
23 against the wall.

24 26. Plaintiff's treatment at East LA Station continued to deteriorate. In direct
25 contravention to Department procedure and policy, Plaintiff was placed in peril when she
26 was denied proper backup when she responded to calls, and at other times she did not
27 receive backup at all. Plaintiff was told not to respond to calls even when she was the
28 assigned assisting unit.

1 27. On or about March 6, 2012, a Sheriff's Department Personnel Transfer
2 Request was posted in the report writing room at East LA with Plaintiff's name on it. FTO
3 Hernandez brought the "phony" transfer request to Sergeant Jennifer Barsh. Plaintiff was
4 on patrol and ordered back to the station by Sergeant Barsh at which time Plaintiff
5 informed Sergeant Barsh of the sexually explicit and violent behavior that she had been
6 subjected to by male deputies at East LA, specifically those associated with FTO Valdez
7 and the Banditos.

8 28. March 8, 2012, Sergeant Barsh filed a Policy of Equality Report ("POE") on
9 Plaintiff's behalf mentioning that Plaintiff was a "strong female" and informed Captain
10 Henry Romero of the threats, harassment, and workplace violence that Plaintiff had been
11 subjected to at East LA, and that Plaintiff was in fear for her safety and very fearful of
12 retaliation from those deputies implicated in Plaintiff's POE. Captain Romero offered
13 Plaintiff to transfer, but Plaintiff did not feel she had done anything to warrant such
14 treatment. Further, because of the culture in the LACSD, if Plaintiff was transferred to
15 another area, Plaintiff would be subjected to ostracism and taunting by deputies for
16 moving to another area. Plaintiff remained at the East LA station, but was moved to day
17 shift in an impotent gesture that was supposed to provide Plaintiff a reprieve from the
18 harassment perpetrated by those deputies on her current shift.

19 29. Deputies Christopher Wargo, Benjamin Zaredini, Andrew Hernandez, and
20 Eduardo Sanchez were implicated in Plaintiff's POE and subsequently placed on loan to
21 other stations pending the outcome of the POE investigation. The change in Plaintiff's
22 shift in conjunction with the loan of the implicated officers had little deterrent effect on the
23 continued harassment from other associates of the Banditos, in that FTO Valdez and FTO
24 Christopher Valente, who were also implicated in Plaintiff's POE, remained at East LA for
25 the duration of the investigation.

26 30. The sexual harassment of Plaintiff described above was part of a pattern
27 and practice of sexual harassment against female deputies in the Department by deputy
28 cliques/gangs. The Department and its Command Staff, including Undersheriff Paul

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1 Tanaka, knew about and ratified this pattern and practice of sexual harassment for many
2 years. The Department failed to take any action to protect Plaintiff from sexual
3 harassment or stop the cliques and provide a safe working environment. After Plaintiff's
4 POE complaint was filed, Plaintiff was still subjected to a hostile work environment as
5 described below in paragraphs 31 through 47.

6 31. Subsequent to filing the POE, Plaintiff was subjected to multiple acts of
7 retaliation, in that: [1] On or about March 26, 2012, Deputy Zaredini ran Plaintiff's vehicle
8 off the road; [2] Plaintiff was not provided adequate time to prepare her administrative
9 paperwork, supervisors at the station refused to sign off on Plaintiff's reports, and
10 detectives refused to file or investigate her cases; [3] Plaintiff was regularly sent on calls
11 minutes before the end of her shift; [4] On or about August 10, 2012, Deputy Krautkramer,
12 upset with the felony DUI arrest of Deputy Christopher Wargo, whom had been loaned out
13 to another station pending Plaintiff's POE, pulled alongside Plaintiff in the rear parking lot
14 of the East LA station and used his vehicle to spray dirt in Plaintiff's face and on Plaintiff's
15 uniform; [5] Dispatch refused to respond to Plaintiff's calls or provide Plaintiff backup or
16 assistance; [6] On or about October 25, 2012, Plaintiff's car was vandalized and her tire
17 was punctured while in the parking lot at East LA.

18 32. On or about December 27, 2012, without notifying Plaintiff, the Department
19 returned to East LA station those deputies implicated in Plaintiff's POE complaint whom
20 had been loaned to other stations pending the determination of the POE complaint. In so
21 doing, the Department violated its own policy by failing to notifying Plaintiff in writing within
22 (30) days of the determination of the Plaintiff's POE complaint, which was apparently
23 rendered by the Department's Equity Oversight Panel almost two weeks earlier on
24 December 13, 2012. (Plaintiff was not notified until approximately 75 days later.)

25 33. Because the County's Policy of Equality complaint process is an internal
26 administrative grievance procedure, the statute of limitations for Plaintiff to file a DFEH
27 charge should be equitably tolled from March 8, 2012, to December 13, 2012. See
28 *McDonald v. Antelope Valley College* (2008), 45 Cal. 4th 88, 114.

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1 34. Immediately after seeing the deputies had been returned to East LA, Plaintiff
2 began to suffer extreme fear and anxiety, chest pains and shortness of breath. Plaintiff
3 immediately left East LA and drove herself to the emergency room at Kaiser-Riverside
4 where she was treated for a stress-induced pre-heart attack condition, and as a result,
5 Plaintiff was placed on medical leave by her treating emergency room doctor. While on
6 medical leave, Plaintiff lost overtime, sick time, vacation time and pay that could impact
7 her pension.

8 35. Plaintiff attempted to return to work on February 2, 2013, but was again
9 subjected to the same intimidation and retaliatory harassment by those same deputies
10 and their associates at East LA. On February 3, 2013, Plaintiff was again placed on leave
11 by her treating physician, though Plaintiff's leave did not stop the retaliation.

12 36. April 10, 2013, Plaintiff found a dead rat under the driver-side door of her
13 car, a clear message that she was considered a "Rat" for filing her POE. The following
14 day, eggs were thrown at Plaintiff's vehicle and "fuck you" was written on the rear window
15 of Plaintiff's vehicle.

16 37. Plaintiff has achieved the necessary level of experience, educational
17 requirements, and requisite qualifications to promote the rank of Sergeant, and in June
18 2013, Plaintiff signed up to take the Sergeant's exam and received her examination date
19 for July 2013. However, because of the continued stress, retaliatory harassment,
20 Plaintiff's legitimate fear for her own safety, and the Department's disinterest and inability
21 to provide any semblance of adequate security for Plaintiff in the current climate at East
22 LA, Plaintiff was constructively precluded from being able to take the promotional
23 sergeant's examination.

24 38. On or about June 24, 2013, Plaintiff engaged in the protected activity of filing
25 a complaint with the DFEH against Defendant County of Los Angeles.

26 39. On or about August 8, 2013, Plaintiff was taken off disability by her treating
27 doctor and cleared to return to work. Plaintiff contacted the "Back to Work Unit," but was
28 told that they could not help her and advised her to contact the Station Director. Plaintiff

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1 then spoke with Sergeant Betty Lascono. Sergeant Lascono placed Plaintiff on the
2 schedule to return to work at East LA on August 9, 2013. Plaintiff was contacted once
3 again by Sergeant Lascano and told to report to work on August 11, 2013.

4 40. Plaintiff was extremely apprehensive in that she did not want to be placed
5 back in the hostile environment of East LA, so that same day, August 9, 2013, Plaintiff
6 contacted her union, ALADS, for assistance. Plaintiff was immediately told that they could
7 not assist her. Later that same afternoon, Plaintiff was contacted by Union
8 Representative Julie Patrelli ("Patrelli"). Patrelli informed Plaintiff that East LA Captain
9 James Wolak was willing to send Plaintiff to Cerritos Station. Plaintiff informed Patrelli
10 that she would go anywhere except for East LA. At the end of the conversation, Plaintiff
11 was under the impression she would be going to Cerritos Station.

12 41. Patrelli called Plaintiff for a second time and informed her that she would not
13 be going to Cerritos Station, but that she would be going to the County Services Bureau –
14 USC Hospital location, and that she, Patrelli would call Plaintiff on Monday, August 11,
15 2013 for her schedule at USC Hospital.

16 42. Plaintiff never received a return call back from Patrelli. Plaintiff eventually
17 contacted Patrelli and she, Patrelli, informed Plaintiff that Captain Wolak could not send
18 her to County Services Bureau at USC Hospital. Patrelli then scheduled a meeting with
19 Division Commander Henry Romero (formerly Plaintiff's Captain at East LA). Plaintiff
20 requested that Patrelli accompany her to the meeting, but Patrelli refused to accompany
21 Plaintiff or to send any other union representation with Plaintiff. Patrelli then stated to
22 Plaintiff, "You should be grateful that Commander Romero is willing to meet with you!"

23 43. On August 14, 2013, Plaintiff met with Commander Romero and
24 Commander Walker. Both were aware of Plaintiff's POE and the hostile environment
25 Plaintiff had encountered at East LA, especially Commander Romero since on March 8,
26 2012, he was personally handed a copy of Plaintiff's POE complaint in his capacity as
27 Plaintiff's then Captain at East LA Station, the very day Plaintiff's POE was filed with the
28 Intake Specialist Unit by Sergeant Jennifer Barsh.

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1 44. Once again Plaintiff was asked by Commander Romero where she wanted
2 to go. A "legitimate" Sheriff's Department Transfer Request form was produced by
3 Commander Romero's secretary listing Plaintiff's choices of San Dimas Station or Walnut
4 Station. Plaintiff requested a copy of the transfer request form, but Commander Romero
5 refused to provide Plaintiff with a copy. Commander Romero then informed Plaintiff that
6 she would be placed on loan to Century Station pending the approval of her transfer to
7 San Dimas or Walnut.

8 45. Upon arrival at Century Station, Plaintiff was assigned to the Youth Activity
9 League, a position where Plaintiff could be warehoused with no possibility to advance in
10 her career. Plaintiff's Lieutenant at Century Station, Lieutenant Infante had previously
11 been a Lieutenant at East LA and was intimately aware of Plaintiff's POE complaint and
12 Plaintiff's difficulties with her prior superiors and the Banditos at East LA. Lieutenant
13 Infante made it known to Plaintiff's Sergeant at Century Station, Sergeant De La Rosa,
14 that he, Infante, did not want Plaintiff at Century Station.

15 46. On December 3, 2013, Plaintiff was informed by Sergeant De La Rosa that if
16 she, Plaintiff, wanted to stay at Century Station, she would have to complete a transfer
17 request immediately. Plaintiff was informed by Commander Gooden and Chief Goran that
18 if she did not put in the transfer that she would have to go back to East LA. Captain
19 Chavez at Century Station had already signed the transfer and Plaintiff signed the transfer
20 "Under Protest". She did not understand what was going on or what had happened to her
21 previously filed transfer to San Dimas or Walnut. It appeared that the Department was
22 engaging in a form of retaliation and discrimination by subjecting Plaintiff to a form of
23 "freeway therapy."

24 47. Plaintiff attempted to contact Commander Romero to inquire as to the status
25 of her transfer that he had put in for her on August 14, 2013, but he was not available.
26 Plaintiff went to Area Command and requested a copy of her transfer that was supposed
27 to have been filed by Commander Romero. Plaintiff discovered that the transfer was still
28 in her file and signed by both Commander Romero and Captain Wolak, but the transfer

1 was never filed or placed in the system for processing.

2 48. Plaintiff was then instructed by Sergeant De La Rosa to execute a new
3 transfer application and put Century Station as her first choice followed by San Dimas and
4 Walnut, and that if she did not sign the transfer, she would be sent back to East LA.
5 Under duress and out of fear and apprehension of being sent back to East LA, Plaintiff
6 signed the transfer to Century Station. However, as of the date of this complaint,
7 Plaintiff's transfer has not been processed and Plaintiff remains assigned to East LA, but
8 on loan to Century Station.

9 49. In or about August 2013 in retaliation for complaining about sexual
10 harassment and retaliation, Plaintiff was denied transfers to locations she desired and
11 instead was sent to Century Youth Activity League and later to the undesirable position at
12 Transit Services Bureau.

13 50. Plaintiff has been denied bi-lingual pay, overtime compensation, patrol
14 retention pay, and denied training.

15 51. On or about March 25, 2014, Plaintiff engaged in the protected activity of
16 filing a Superior Court lawsuit against Defendant for sexual harassment (hostile work
17 environment) and retaliation in violation of the FEHA.

18 52. After Plaintiff filed her lawsuit for retaliation and harassment, she was
19 subjected to a bogus investigation concerning inappropriate comments she allegedly
20 made in the presence of members of the Century Youth Activity League. Despite
21 overwhelming evidence that Plaintiff did nothing wrong, and the fact that a Deputy
22 Sheriff's supervisor made threats towards witnesses and obtained false statements from
23 witnesses in order to support the false allegations of misconduct, the County terminated
24 Plaintiff's employment on or about April 20, 2015.

25 **FIRST CAUSE OF ACTION**
26 **FOR RETALIATION IN VIOLATION OF THE CALIFORNIA FAIR EMPLOYMENT**
27 **AND HOUSING ACT AGAINST DEFENDANTS, AND EACH OF THEM**

28 53. Plaintiff incorporates the allegations set forth in paragraphs 1 through 52 as

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1 if set forth in full herein.

2 54. Plaintiff suffered retaliation for reluctantly reporting to her supervisors about
3 being subjected to severe and continuous sexual harassment, and discrimination based
4 on her gender. Plaintiff was retaliated against for causing the filing of a Policy of Equality
5 Report regarding unlawful conduct and implicating the aforementioned male deputies at
6 East LA for gender discrimination, and Plaintiff filed a lawsuit under the Fair Employment
7 and Housing Act for harassment and retaliation and has been subjected to a series of
8 retaliatory adverse employment actions including, but not limited to, the following.

9 55. Plaintiff's schedule and shift starting times were continually and punitively
10 manipulated to cause Plaintiff as much grief and consternation as possible. Supervisors
11 engaged in retaliatory indifference and refused Plaintiff enough time to complete her
12 paperwork and refused to sign off on her completed reports. When detectives discovered
13 case files assigned to them belonged to Plaintiff, they refused to investigate her cases.

14 56. Plaintiff was promised and then was punitively denied transfer out of East
15 LA. In fact, Plaintiff's signed transfer prepared August 14, 2013 by Commander Romero's
16 office, which included Plaintiff's only choices of San Dimas Station or Walnut Station.
17 However, the transfer was never filed or processed by Commander Romero or the
18 Department. Plaintiff was told she would only be placed on "loan" to Century Station
19 pending the approval of her transfer to San Dimas or Walnut.

20 57. While awaiting approval of her transfer, Plaintiff was threatened with a return
21 back to East LA if she did not alter her previous transfer request and place Century
22 Station as her first choice. Under duress, and in order to avoid being sent back to the
23 peril of East LA, Plaintiff was forced to sign a transfer to Century Station, though as of the
24 date of this complaint, the transfer has not been processed and Plaintiff remains assigned
25 to East LA, but on loan to Century Station.

26 58. It is well known in the Sherriff's Department that Century Station's Youth
27 Activity League assignment is used as a "dumping ground" for experienced deputies the
28 Department considers "troublemakers." Furthermore, as a direct result of the

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1 Department's retaliatory conduct, Plaintiff's ability to promote to the rank of sergeant or be
2 moved to any coveted assignments and advance in the Department has been completely
3 destroyed.

4 59. Plaintiff's life was and is put in jeopardy by deputies that have, and will in the
5 future, refuse to back her up and provide support while she is working the field.

6 60. Plaintiff was denied transfers to locations she desired and instead was sent
7 to Century Youth Activity League and later to the undesirable position at Transit Services
8 Bureau.

9 61. Plaintiff has been denied bi-lingual pay, overtime compensation, patrol
10 retention pay, and denied training.

11 62. Plaintiff was unlawfully and wrongfully terminated by the County of Los
12 Angeles.

13 63. Said actions and conduct of the Department, consisting of the
14 aforementioned retaliation against Plaintiff, constituted unlawful employment practices
15 under California *Government Code* section 12940(h).

16 64. The aforementioned unlawful employment practices on the part of the
17 Department were a substantial factor in causing damages and injuries to Plaintiff.

18 65. As a result of the aforesaid unlawful acts of the Department, Plaintiff has lost
19 and will continue to lose income, in an amount to be proven at time of trial. Plaintiff claims
20 such amount as damages together with prejudgment interest pursuant to California *Civil*
21 *Code* section 3287 and/or any other provision of law providing for prejudgment interest.

22 66. As a result of the aforesaid unlawful acts of the Department, Plaintiff was
23 personally humiliated and had become mentally upset, distressed and aggravated.
24 Plaintiff claims general damages for such mental distress and aggravation in an amount of
25 be proven at time of trial.

26 67. As a result of the unlawful conduct of the Department, Plaintiff was required
27 to retain attorneys and is entitled to attorneys' fees pursuant to *Government Code* section
28 12965.

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1 68. Plaintiff has duly filed administrative complaints with the California
2 Department of Fair Employment and Housing ("DFEH") substantially alleging the acts and
3 conduct of the County as herein above described. The DFEH issued "right-to-sue" notices
4 on or about August 5, 2014 and June 26, 2015. True and correct copies of said notices
5 are attached hereto as Exhibit "1."

6 **PRAYER**

7 **WHEREFORE**, Plaintiff seeks judgment against Defendants, and each of them, as
8 follows:

9 1. On each cause of action, for physical, mental, and emotional injuries, pain,
10 distress, suffering, anguish, fright, nervousness, grief, anxiety, worry, shame, mortification,
11 injured feelings, shock, humiliation and indignity, as well as other unpleasant physical,
12 mental, and emotional reactions, damages to reputation, and other non-economic
13 damages, in a sum to be ascertained according to proof;

14 2. On each cause of action, for health care, services, supplies, medicines,
15 health care appliances, modalities, and other related expenses in a sum to be ascertained
16 according to proof;

17 3. On each cause of action, for loss of wages, income, earnings, earning
18 capacity, benefits, pension loss and other economic damages in a sum to be ascertained
19 according to proof;

20 4. Other actual, consequential, and/or incidental damages in a sum to be
21 ascertained according to proof;

22 5. Attorney fees and costs of suit pursuant to *California Government Code*
23 Section 12965(b), *C.C.P.* 1021.5, and other authorities;

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07 / 16 / 2015

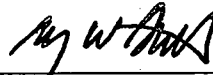
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- 6. Costs of suit herein incurred;
- 7. Pre-judgment interest;
- 8. Such other and further relief as the Court may deem just and proper.

Dated: July 15, 2015

LAW OFFICES OF GREGORY W. SMITH

By:



GREGORY W. SMITH
DIANA WANG WELLS
Attorneys for Plaintiff
GUADALUPE LOPEZ

07/16/2015

07 / 16 / 2015

EXHIBIT "1"



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TTY 800-700-2320
www.dfeh.ca.gov

DIRECTOR PHYLIS W. CHENG

Aug 05, 2014

Guadalupe Lopez
9100 Wilshire Blvd Suite 345E
Beverly Hills California 90212

RE: Notice of Case Closure and Right to Sue

DFEH Matter Number: 335522-119331

Right to Sue: Lopez / County Of Los Angeles Los Angeles County Sheriff Dept

Dear Guadalupe Lopez,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective Aug 05, 2014 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

To obtain a federal Right to Sue notice, you must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Department of Fair Employment and Housing

07/16/2015



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TTY 800-700-2320
www.dfeh.ca.gov

DIRECTOR PHYLIS W. CHENG

Enclosures

cc:

07 / 16 / 2015



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

DIRECTOR KEVIN KISH

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

June 26, 2015

Guadalupe Lopez
9100 Wilshire Blvd. Suite 345E
Beverly Hills California 90212

RE: Notice of Case Closure and Right to Sue
DFEH Matter Number: 29765-165582
Right to Sue: Lopez /

Dear Guadalupe Lopez,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective June 26, 2015 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

To obtain a federal Right to Sue notice, you must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Department of Fair Employment and Housing

07 / 16 / 2015



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

DIRECTOR KEVIN KISH

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

Enclosures

cc:

07/16/2015

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
GREGORY W. SMITH (SBN 134385)
DIANA WANG WELLS (SBN 284215)
LAW OFFICES OF GREGORY W. SMITH
9100 WILSHIRE BOULEVARD, SUITE 345E
BEVERLY HILLS, CALIFORNIA 90212
TELEPHONE NO.: (310) 777-7894 FAX NO.: (310) 777-7895
ATTORNEY FOR (Name): Plaintiff GUADALUPE LOPEZ

FOR COURT USE ONLY

FILED
Superior Court Of California
County Of Los Angeles

JUL 16 2015

Sherrill [Signature] Officer/Clerk
By [Signature] Deputy

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
STREET ADDRESS: 111 NORTH HILL STREET
MAILING ADDRESS: 111 NORTH HILL STREET
CITY AND ZIP CODE: LOS ANGELES, CALIFORNIA 90012
BRANCH NAME: CENTRAL DISTRICT

CASE NAME: GUADALUPE LOPEZ v. COUNTY OF LOS ANGELES, et al.

CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$25,000) Limited (Amount demanded is \$25,000 or less)

Complex Case Designation
 Counter Joinder
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER: **BC 588302**
JUDGE:
DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input checked="" type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
a. Large number of separately represented parties d. Large number of witnesses
b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
c. Substantial amount of documentary evidence f. Substantial postjudgment judicial supervision
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): ONE (1)
5. This case is is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)
Date: JULY 15, 2015
GREGORY W. SMITH (SBN 134385)
DIANA WANG WELLS (TYPE OR PRINT NAME) (SBN 284215) (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the primary cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (*not asbestos or toxic/environmental*) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (*not medical or legal*)
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract (*not unlawful detainer or wrongful eviction*)
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (*not provisionally complex*) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor
Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (*non-domestic relations*)
Sister State Judgment
Administrative Agency Award (*not unpaid taxes*)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (*not specified above*) (42)
Declaratory Relief Only
Injunctive Relief Only (*non-harassment*)
Mechanics Lien
Other Commercial Complaint Case (*non-tort/non-complex*)
Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (*not specified above*) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief from Late Claim
Other Civil Petition

**CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to LASC Local Rule 2.0 in all new civil case filings in the Los Angeles Superior Court.

Item I. Check the types of hearing and fill in the estimated length of hearing expected for this case:

JURY TRIAL? YES CLASS ACTION? YES LIMITED CASE? YES TIME ESTIMATED FOR TRIAL 7-10 HOURS/ DAYS

Item II. Select the correct district and courthouse location (4 steps – If you checked "Limited Case", skip to Item III, Pg. 4):

Step 1: After first completing the Civil Case Cover Sheet Form, find the main civil case cover sheet heading for your case in the left margin below, and, to the right in Column A, the Civil Case Cover Sheet case type you selected.

Step 2: Check one Superior Court type of action in Column B below which best describes the nature of this case.

Step 3: In Column C, circle the reason for the court location choice that applies to the type of action you have checked. For any exception to the court location, see Los Angeles Superior Court Local Rule 2.0.

Applicable Reasons for Choosing Courthouse Location (See Column C below)

1. Class Actions must be filed in the County Courthouse, Central District.
2. May be filed in Central (Other county, or no Bodily Injury/Property Damage).
3. Location where cause of action arose.
4. Location where bodily injury, death or damage occurred.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle.
7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office.

Step 4: Fill in the information requested on page 4 in Item III; complete Item IV. Sign the declaration.

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1., 2., 4.
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1., 2., 4.
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	2.
		<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	2.
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1., 2., 3., 4., 8.
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1., 2., 4.
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1., 2., 4.
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1., 2., 4.
<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)		1., 2., 4.	
<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress		1., 2., 3.	
<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death		1., 2., 4.	
Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1., 2., 3.	
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1., 2., 3.	
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1., 2., 3.	
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1., 2., 3.	

Non-Personal Injury/Property Damage/
Wrongful Death Tort (Cont'd.)

Employment

Contract

Real Property

Unlawful Detainer
Judicial Review

SHORT TITLE: GUADALUPE LOPEZ v. COUNTY OF LOS ANGELES, et al.		CASE NUMBER
A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1., 2., 3.
	<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1., 2., 3.
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	2., 3.
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1., 2., 3.
Other Employment (15)	<input checked="" type="checkbox"/> A6024 Other Employment Complaint Case	1., 2., 3.
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10.
Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not Unlawful Detainer or wrongful eviction)	2., 5.
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2., 5.
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1., 2., 5.
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1., 2., 5.
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	2., 5., 6.
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	2., 5.
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1., 2., 5., 8.
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1., 2., 3., 5.
	<input type="checkbox"/> A6031 Tortious Interference	1., 2., 3., 5.
	<input type="checkbox"/> A6027 Other Contract Dispute;(not breach/insurance/fraud/negligence)	1., 2., 3., 8.
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2.
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2., 6.
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2., 6.
	<input type="checkbox"/> A6032 Quiet Title	2., 6.
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2., 6.
Unlawful Detainer - Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer - Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	2., 6.
Unlawful Detainer - Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2., 6.
Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2., 6.
Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2., 5.

Judicial Review (Cont'd.)

Provisionally Complex Litigation

Enforcement of Judgment

Miscellaneous Civil Complaints

Miscellaneous Civil Petitions

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus	2., 8.
	<input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter	2.
Other Judicial Review (39)	<input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2.
	<input type="checkbox"/> A6150 Other Writ / Judicial Review	2., 8.
Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1., 2., 8.
Construction Defect (10)	<input type="checkbox"/> A6007 Construction defect	1., 2., 3.
Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1., 2., 8.
Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1., 2., 8.
Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1., 2., 3., 8.
Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1., 2., 5., 8.
Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2., 9.
	<input type="checkbox"/> A6160 Abstract of Judgment	2., 6.
	<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2., 9.
	<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2., 8.
	<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2., 8.
	<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2., 8., 9.
RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1., 2., 8.
Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1., 2., 8.
	<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2., 8.
	<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1., 2., 8.
	<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1., 2., 8.
Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2., 8.
Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2., 3., 9.
	<input type="checkbox"/> A6123 Workplace Harassment	2., 3., 9.
	<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2., 3., 9.
	<input type="checkbox"/> A6190 Election Contest	2.
	<input type="checkbox"/> A6110 Petition for Change of Name	2., 7.
	<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2., 3., 4., 8.
	<input type="checkbox"/> A6100 Other Civil Petition	2., 9.

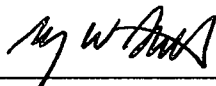
SHORT TITLE: GUADALUPE LOPEZ v. COUNTY OF LOS ANGELES, et al.	CASE NUMBER
--	-------------

Item III. Statement of Location: Enter the address of the accident, party's residence or place of business, performance, or other circumstance indicated in Item II., Step 3 on Page 1, as the proper reason for filing in the court location you selected.

REASON: CHECK THE NUMBER UNDER COLUMN C WHICH APPLIES IN THIS CASE <input type="checkbox"/> 1. <input checked="" type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10.			ADDRESS: 500 WEST TEMPLE STREET, SUITE 383
CITY: LOS ANGELES	STATE: CA	ZIP CODE: 90012	

Item IV. Declaration of Assignment: I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that the above-entitled matter is properly filed for assignment to the SUPERIOR COURT OF THE STATE OF CALIFORNIA courthouse in the CENTRAL District of the Los Angeles Superior Court (Code Civ. Proc., § 392 et seq., and LASC Local Rule 2.0, subs. (b), (c) and (d)).

Dated: JULY 15, 2015



 (SIGNATURE OF ATTORNEY/FILING PARTY)
 GREGORY W. SMITH/DIANA WANG WELLS

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet form CM-010.
4. Complete Addendum to Civil Case Cover Sheet form LACIV 109 (Rev 01/07), LASC Approved 03-04.
5. Payment in full of the filing fee, unless fees have been waived.
6. Signed order appointing the Guardian ad Litem, JC form FL-935, if the plaintiff or petitioner is a minor under 18 years of age, or if required by Court.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

07/16/2015