



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

The following individuals submitted comments on agenda item:				
Agenda #	Relate To	Position	Name	Comments
Public Comment		Favor	Crystal C Jones	I AM A CITIZEN RESIDENT CONSTIUEENT AND MOTHER AND I HAVE EMAILED THE BOS, GOVERNOR, SENATOR ALEX, everyone FOR THE LAST 4-5 YEARS WHEN THE CHAOS OCCURED AND THE OPPRESSION AND EXPLOITATION STARTED TO TALE PLACE AND I KNOCKED ON EVERY DOOR TO RENDER HELP GUIDANCE AND INTERVENTION TO STOP THE INTETNIONAL MALICIOUS INTENT MY NAME IS CRYSTAL JONES ALL SUPERVISORS KNOW WHO I AM. I HAVE BEEN THREATED AND SO HAVE MY KIDS TO NOT TELL ANYTHING OF WHAT OCCURED AAS WE ARE HOMELESS STAYING HOUSE TO HOUSE WHEN WE HAD OUR OWN HOME AND PRESCHOOL THAT WAS INTENTIONALLY RUINED BY CDSS SHARON GREENE , OSTEEEN BRANDI, KAREN CHANG, KAREN CHAMBERS, DEBRA COLEMAN, JOELLE LAM.CHS FIRST 5 LA INTERNAL STAFF, RITU PUBLIC COUNCIL DIRECTOR LIED MANIPULATED ME OUT OF MY HOME WITH MY KIDS THE BETRAYAL OF OUR PUBLIC COUNCIL LEGAL AID CHILDCARE LAW AND LEGAL AID FOUNDATION AND OMBUDSMAN OFFICE SENATORS, MAYORS, LEGISLATORS, GOVERNOR,CRYSTAL STAIRS ECPC, SO MANY I ASKED TO HELP NOBODY HELPED ME I WAS IGNORED AND STRIPED AWAY FROM MY STABILITY SUCCESS AND PRIDE OF SUCCESS COMING FROM NOTHING INTO EVERYTHING I DREAMED THAT WAS RUINED. I WANT ACCOUNTABILITY, JUSTICE AND COMPENSATYION FOR EVERYTHING ME AND MY KIDS LOST THAT WE WORKED HARD FOR AND CONTRIBUTED TO OUR COMMUNITY AS EFFECTIVE SOLUITONS TO THRIVE WHILE WE WERE OUT ON PURPOSE ON CALWORKS CALFRESH AND APPLY FOR HOMELESS SERVICES THAT WE NEVER RECEIVED OR WERE ALLOWED TO MOVE INTO AFFORDABLE HOUSING WE HELPED TO ESTABLISH YET WAS NOT EVEN FINISHED BEING BUILT.YET HAD US APPLY FOR LOW INCOME HOMELESS BUILDINGS THAT WERE STILL IN CONSTRUCTION MODE. MY WEBSITE BUSINESS AND IMPACT WAS MISUSED FOR RENOVATION FUNDS AND WE WERE DENIED HELP CARE OR RENOVATIONS TO EXPAND AND CONTINUE THE GREAT WORK THAT IS STILL NEEDED AND I AM LOSING WORK INCOME AND CHILDREN TO CARE FOR WHO CALL ME DAILY FOR CARE AND PRESCHOOL SERVICES. I AM OVERWHELMED AND HAD NO IDEA THIS WAS THE RESULT FOR SEEKING HELP TO BECOME A STATE PRESCHOOL. THEY USED OUR VISION TO CREATE UPK AND PRESCHOOL FOR ALL MOVEMENT. I WANT ACCOUNTABILITY CREDIT FOR MY INTELLECTUAL PROPERTY THAT WAS MISUSED AND EFFECTIVE THAT HELPED BRIDEG GAPS AND BRING IMMEDIATE SOLUTIONS. I AM HERE TO FINALLY NOT BE INTIMIDATED OR AFRIAD AND STAND BOLD TO FIGHT FOR WHO I AM AND ALL WE HAD ESTABLISHED FROM NOTHING INTO EVERYTHING WE NEED. I NEED MY BOS LEADERS HELP. WHAT IS GOING ON THEY BLOCKED MY EMAILS AND TRIED TO SWITCH IT UP ON ME AND SAY I WAS FRUAD

As of: 1/6/2026 1:00:10 PM



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		<p>AND I WAS DOING THE WORK SHARING THE WORK TO HELP BUILD UP AND REIMAGINE THE WORK. I AM SO HURT AND FED UP FOR MY KIDS SAKE AS A SINGLE MOM WHO MADE IT AND THE GOVERNMENT LEADERS STUDIED AND RUINED US TO THE POINT THEY KNOCKED DOWN OUR BUILDING WITH ALL OUR LEARNING SUPPLIES INSIDE THE BIN STORED OUTDORS WITH BRAND NEW PLAYGROUND EQUIPMENT AND LEARNING SUPPLIES. I HAD THIS FROM MY SMALL BUINSESS WORKING EVERYDAY OVER 12HOURS PER DAY 5:45AM-8:30PM DAILY. I TRIED TO GET A LAWYER THEY TOLD ME IT WAS A CONFLICT OF INTERST HOW WHEN I NEED HELP AND IMMEDIATE INTERVENTION. THEY EVEN BLOCKED THE LETTERS TO MAYOR FUND AND LEADERS ITRIED TO COMMUNICATE THE INTENTIONAL MALICE AND CURPTION THEY MADE ME AND MY KIDS FACE ON PURPOSE. MY TEEN DAUGHTERS AND MYSELF ARE NOT OK, WE DESERVE REAL JUSTICE HELP APOLOGIES AND ANSWERS. my number is 562200-4848 and I would love to have a meeting to be placed on the agenda for answers and justicification of why me and my kids are still homeless after 4 years and we had a home businesses and real leadership community impact and effective changes.</p>
	Other	<p>ALISON H FAIRCHILD</p> <p>Several times during the years 2015, 2016, 2017, and 2018 County of Los Angeles has willfully, recklessly, knowingly, deliberately, carelessly, wantonly, fraudulently, and callously allowed legal document process servers employed by County of Los Angeles's longstanding co-conspirators Rapid Legal, ABC Legal, One Legal, Pro Legal, United Legal, Countywide Process LLC, One Legal, and many other companies to impede, block, and obstruct Superior Court of California, County of Los Angeles, Stanley Mosk Superior Court entrances, exits, outside of Stanley Mosk courthouse handicap ramps,</p> <p>inside court hallways, inside court hallways, and outside court handicap ramp leading to the 2nd Floor court entrance.</p> <p>During August 2025, September 2025, October 2025, November 2025, and December 2025 County of Los Angeles and its employees, Deni K. Butler and David Wayne Slayton willfully, recklessly, knowingly, deliberately, carelessly, cruelly, wantonly, fraudulently, and callously allowed legal document process servers employed by County of Los Angeles's longstanding co-conspirators Rapid Legal, ABC Legal, One Legal, Pro Legal, United Legal, Countywide Process LLC, One Legal, and many other companies to impede, block, and obstruct Superior Court of California, County of Los Angeles, Stanley Mosk Superior Court entrances, exits, outside handicap ramps, inside court hallways, inside court hallways, and outside court handicap ramp leading to 2nd Floor court entrance, which also impeded, blocked, and obstructed disabled Alison Helen Fairchild's path and ability to maneuver her wheelchair safely to enter and exit the Superior Court of California courthouse while she</p>



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was present there with KING AROGANT on September 5, 2025 and again a second and third time during the month of October 2025. County of Los Angeles, David Wayne Slayton and Deni K. Butler are hereby being forewarned that their reckless failure to immediately remove these loitering and soliciting individuals from being anywhere near these Superior Court of California, County of Los Angeles, Stanley Mosk Superior Court entrances, exits, outside handicap ramps, inside court hallways, inside court hallways, and outside court handicap ramp leading to 2nd Floor court entrance will result in a civil rights being filed against them all, and each of them. County of Los Angeles employees will be held liable for Luna's lazy peace officers

failing to remove these ADA entrances and exits blocking, soliciting, and loitering individuals from the Stanley Mosk Courthouse's entrances, exits, hallways, and walkways. THESE LOITERING, SOLICITING, & CONDUCTING BUSINESS ON COUNTY OF LOS ANGELES PUBLIC PROPERTY MUST BE REMOVED IMMEDIATELY!

As detailed in her civil rights complaint, Fairchild experienced numerous instances of disability discrimination by legal process servers and the County of Los Angeles. At the same time, she was present at the handicap ramp independently, and unable to proceed to the second floor of the Stanley Mosk Courthouse due to the County of Los Angeles recklessly allowing individuals to block her path on the outside ADA handicap ramp, and also on numerous occasions, prevented Fairchild from getting proper and needed exercise on the handicap ramp. At the same time, she was present at the Stanley Mosk Superior Courthouse.

Over the course of October 2025, November 2025, and December 2025, the County of Los Angeles and its employees have all willfully, recklessly, knowingly, deliberately, carelessly, wantonly, fraudulently, cruelly, and callously violated KING AROGANT and Alison Helen Fairchild's constitutional First and Fourteenth Amendment civil rights by recklessly failing to upload each and every page and attachment of their public comments. Accordingly, pursuant to California Government Code Section 54950, the County of Los Angeles and its elected Board of Supervisors employees Lindsey Patrice Horvath (paid \$ 389,248.00 by the County of Los Angeles in 2024 for her total

benefits and pay), Holly J. Mitchell (paid \$ 372,850.00 by the County of Los Angeles in 2024 for her total benefits and pay), Hilda Solis (paid \$ 390,346 by the County of Los Angeles in 2024 for her total benefits and pay), Kathryn Barger-Leibrich (paid \$ 394,630 by the County of Los Angeles in 2024 for her



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total benefits and pay) and Janice Hahn (paid \$ 371,719 by the County of Los Angeles in 2024 for her total benefits and pay) had better make sure that all pages and attachments of October 14, 2025, October 21, and October 28, 2025 KING AROGANT and Alison Helen Fairchild County of Los Angeles Board of Supervisors' Public Board Comments become official records of County of Los Angeles and are also accessible to the public by way of County of Los Angeles's

Statement of Proceedings/Minutes in a timely and reasonable manner.

On the early morning of November 17, 2025, KING AROGANT was present at the handicap ramp complained upon to this ridiculous board of supervisors panel. KING AROGANT took photographs and video recordings that proved by clear and convincing evidence that County of Los Angeles continues to willfully, recklessly, wantonly. maliciously, deliberately, knowingly, carelessly, negligently, and callously allow individuals to loiter, solicit, obstruct, block, and solicit on the outside of the Stanley Superior Court's handicap ramp. See evidence below:

DECEMBER 2, 2025 YOUTUBE VIDEO RECORDING PROVING CLEAR AND CONVINCING EVIDENCE OF RAPID LEGAL, ONE LEGAL, INFOTRAK AND PROCEED'S (STILL DOING BUSINESS AS COUNSEL PRESS INC, A DELAWARE CORPORATION) AND COUNTY OF LOS ANGELES'S LIABILITY

youtu.be/TV_SVbeCGmQ?si=x88lO3C5alqyknGR

DECEMBER 5, 2025 YOUTUBE VIDEO RECORDING PROVING CLEAR AND CONVINCING EVIDENCE OF RAPID LEGAL, ONE LEGAL, INFOTRAK AND PROCEED'S (STILL DOING BUSINESS AS COUNSEL PRESS INC, A DELAWARE CORPORATION), AND COUNTY OF LOS ANGELES'S LIABILITY.



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youtu.be/chU0wU4_UyE?si=AawP908vDT7nn7Np

DECEMBER 17, 2025 YOUTUBE VIDEO RECORDING PROVING CLEAR AND CONVINCING EVIDENCE OF RAPID LEGAL, ONE LEGAL, INFOTRAK, AND PROCEED'S (STILL DOING BUSINESS AS COUNSEL PRESS INC, A DELAWARE CORPORATION), AND COUNTY OF LOS ANGELES'S LIABILITY

youtu.be/VNaqVTQkJFw?si=SARawqtDBRUCuE1V

DECEMBER 29, 2025 YOUTUBE VIDEO RECORDING PROVING CLEAR AND CONVINCING EVIDENCE OF RAPID LEGAL, ONE LEGAL, INFOTRAK, AND PROCEED'S (STILL DOING BUSINESS AS COUNSEL PRESS INC, A DELAWARE CORPORATION), AND COUNTY OF LOS ANGELES'S LIABILITY.

GX010894 (12/29/2025, DEFENDANTS CREATED A NEW CIVIL RIGHTS COMPLAINT BY NOT REMOVING INDIVIDUALS)

youtu.be/YNtuUSqpwo4?si=XEncZ30d5P2bHYRO



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GX010899 (ONE OF DEFENDANTS' EMPLOYEES IS HEARD ON VIDEO
RECORDING SAYING " AH, THROW ME A METH PIPE

youtu.be/hxMpo5qJmjY?si=JluH2u1fOqgOFK5T

COUNTY OF LOS ANGELES, ITS COUNTY COUNSEL ATTORNEYS, ITS
LASD EXECUTIVES, AND ITS FIVE BOARD OF SUPERVISORS ARE
AGAIN BEING COMMANDED TO IMMEDIATELY REMOVE ALL
INDIVIDUALS FROM THE OUTSIDE STANLEY MOSK SUPERIOR
COURTHOUSE HANDICAP RAMP LOCATED AT 111 NORTH HILL
STREET, LOS ANGELES, CA 90012



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Ann Dorsey	<p>The County's commitment to upholding the will of the voters must be made apparent by taking steps to enact the tennats of Measure J - to shift public dollars away from incarceration and into life-affirming investments like youth development, mental health care, reentry support, housing, and economic opportunity for historically marginalized communities.</p> <p>I urge you to take the following steps to correct the omission of Measure J from the updated County Charter:</p> <p>*Refine Directive 5 so that it explicitly explores a Charter Amendment to fix or remove the harmful provision in Measure G, which repealed Measure J. A direct reversal or cleanup of the repealing language in Measure G would offer a cleaner legal path and preserve the original intent of the voters. Also, County Counsel's review would benefit from direction that focuses on restoring J via repeal of G's conflicting provision, instead of framing it as a new voter choice on J.</p> <p>*Commit to looking in to placing Measure G back on the ballot in 2026 with amendments to affirm Measure J and restore its full legal authority and explicitly incorporate it into the new governance structure.</p> <p>*Fix the structural oversight by ensuring future charter amendments undergo a comprehensive legal compatibility review before being brought to voters.</p> <p>*Ensure the monetary commitment to this measure does not expire in December 2028. As it stands, the economic fallout of this error risks the long-term stability of community investments, threatens job creation, and undermines racial justice work already in motion.</p> <p>*Call in poor policy-making practices by establishing a transparent, community-informed process to prevent similar governance failures in the future.</p> <p>Thank you</p>
Ann Dorsey	<p>Immigrants are the lifeblood of our communities. We depend on them for our day-to-day well-being.</p> <p>I urge you to sponsor, co-sponsor and otherwise support legislation that will keep immigrants safe and help them to thrive.</p> <p>Thank you for what you have already done.</p>
Eva King	<p>Subject: General Public Comment – Rent Price-Gouging Restrictions</p> <p>Dear Supervisors,</p> <p>I am a Los Angeles County property owner writing regarding the ongoing rent price-gouging and HUD-based pricing restrictions that remain in effect</p>



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	<p>following the January 2025 wildfire emergency. While I understand and supported the intent of these protections at the height of the emergency, market conditions have materially changed over the past year. Housing inventory has increased significantly, and many property owners are now experiencing difficulty renting units due to rigid pricing caps that no longer reflect current market realities. As we pass the one-year anniversary of the emergency and approach the current January 2026 expiration date, I respectfully urge the Board to review whether these restrictions remain necessary in their current form, and to consider modifying or ending them to allow for a more balanced and functional rental market. Many responsible property owners are facing financial hardship and prolonged vacancies under the current framework. A timely, data-driven reassessment would benefit both renters and housing providers alike. I have made multiple good-faith attempts over recent months to raise this issue, including delivering written correspondence in person, sending multiple follow-up emails, and submitting letters via certified mail, and I would appreciate guidance on how property owners can meaningfully engage in this policy discussion going forward. I respectfully request that the Board schedule a public discussion or hearing on this issue before any further extensions are considered. Thank you for your time and consideration. Concerned property owner.</p>
Megan Emme	<p>Downtown Women's Center ends homelessness by providing safe housing and supportive services centered on wellness, employment, and advocacy. Although we understand the tremendous challenges of this year's budget, and reduced revenue from Measure A, there is no way to reduce spending without harming those with the greatest vulnerabilities. While we are grateful that there are no planned reductions for survivor specific interim and permanent supportive housing, survivors of gender-based violence are impacted not just by cuts to targeted programs, but system wide cuts that hamper the ability to meet people where they are and connect them to life saving resources.</p> <p>Master Leasing alone faces a \$5.3 million cut, jeopardizing sites that serve residents with complex needs, often as part of encampment resolution efforts, as is the case with Downtown Women's Center's site which serves women and survivors of gender-based violence. Closing these sites risks displacement and the loss of scarce housing.??Additional proposed reductions to ICMS and Time-Limited subsidies will put residents at risk of losing housing and returning to the streets; we can expect subpopulations with the greatest vulnerabilities to be most heavily impacted.</p> <p>These programs, and other programs at risk, are not extras. They are the foundation for how LA County prevents people from entering homelessness and how to help people stabilize once they exit homelessness. When these programs are cut, we don't save money — we shift these costs to hospitals' emergency rooms, county jails, county and cities' crisis response, and ultimately back to the streets.?</p>

				<p>We are also concerned about impact on people with lived experience who may now lose their jobs. Direct services staff often include people who have previous experience with homelessness, and these positions are likely to be most heavily impacted. This will disrupt the stability they've worked so hard for and put them back at risk of homelessness once again. People with lived experience are integral members of our larger homeless services community; their skills and expertise are vital.</p> <p>We respectfully urge the County to address the homeless revenue gap as part of a countywide budget strategy.? Thank you for your consideration, support, and continued partnership</p>
			William Flores-Lemus	<p>I am here to make a complaint towards The Board of Supervisors Hollie Mitchel's subordinate Sonia Lopez that has refused to provide me assistance.</p> <p>That is aware in my complaint towards The Public Defenders office in my claim that they have deliberately sabotaged my petition of a Certificate of Rehabilitation.</p> <p>Denying me due process as to not representing me to my best interest.</p> <p>In specifically Haydah Takasugi and Monnica Thelen.</p> <p>Therefore, I am humbly requesting a in person appointment with Board of Supervisor Hollie Mitchell.</p>
		Item Total	7	
Grand Total			7	

ALISON HELEN FAIRCHILD
1308 EAST COLORADO BLVD.
PASADENA, CA 91106
Mobile: 206.471.1344
Mobile: 626.755.6442
fairchildadacrusader@gmail.com
OF HER OWN COUNSEL
3-0 On Charged Felony Cases Maliciously Prosecuted
Spirit of Esquire

COUNTY OF LOS ANGELES
BOARD OF SUPERVISORS PUBLIC BOARD MEETING

ALISON HELEN FAIRCHILD,
Public Commenter,

v.

hilda solis,
lindsey patrice horvath,
holly j. mitchell,
kathryn barger leibrich,
janice hahn,

Supervisor(s),

ALISON HELEN FAIRCHILD'S
PUBLIC COMMENT FOR JANUARY
6, 2026

Date of Hearing: January 6, 2026
Time: 10:00 AM

PUBLIC COMMENT includes herein Exhibits 1-3

(approximately 300 pages) that must be made

part of the January 6, 2026, Statement of

Proceedings/Minutes pursuant to the

California Government Code § 54950

JANUARY 6, 2025 PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

1 **ALISON HELEN FAIRCHILD'S PUBLIC COMMENT FOR**
2 **JANUARY 6, 2026!**

3
4
5 **ALISON HELEN FAIRCHILD'S PUBLIC COMMENT FOR JANUARY 6, 2026,**
6 **COUNTY OF LOS ANGELES BOARD OF SUPERVISORS' PUBLIC BOARD**
7 **MEETING!**

8
9 County of Los Angeles and its corrupt Sheriff Robert G. Luna did not have any
10 jurisdiction or legal authority to willfully, recklessly, knowingly, fraudulently, wantonly,
11 deliberately, carelessly, and callously lock out a disabled woman named Alison Helen
12 Fairchild out of her home located at 2308 Felicia Avenue, Rowland Heights, CA 91748
13 using an invalid, phony, bogus, and illicit Superior Court of California, County of Los
14 Angeles, West Covina Superior Court writ of possession that did not bear her name and
15 was attached to an illegal Superior Court of California, County of Los Angeles, West
16 Covina Superior Court civil law case number **24WCUD02475**, in which Alison Helen
17 Fairchild was dismissed without prejudice by Plaintiff Chen Property RH LLC. Alison
18 Helen Fairchild was dismissed from illegal Superior Court of California, County of Los
19 Angeles, West Covina Superior Court civil law case **24WCUD02475** in December 2024,
20 which was the same exact case number printed on the illegal 5-day-notice-to-vacate left
21 on her home's front door by County of Los Angeles peace officers on or about June 8,
22 2025. The reckless actions of County of Los Angeles employee Leslie Bouvier Gutierrez
23
24
25

26 **JANUARY 6, PUBLIC COMMENT**

27 **ALISON HELEN FAIRCHILD**
28 **1308 East Colorado Blvd. | Pasadena, CA. 91106**
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1 (SBN # 276241) in conspiring with federal district court Defendants Robert G Luna,
2 The County of Los Angeles, Songfong Tommy Wang (SBN # 272409), Fae Chen,
3 Orange Chen's Property LLC, Chen Property RH LLC, and DOES 1-10 were among the
4 main reasons Alison Helen Fairchild was wrongfully evicted on or about June 15, 2025.
5 County of Los Angeles judicial officer employee Leslie Bouvier Guitterez allowed
6 Alison Helen Fairchild to be wrongfully evicted and fraudulently signed off on her co-
7 conspirators' invalid writ of possession, even after KING AROGANT had submitted
8 documents and told her on the record that Plaintiff Chen Property RH LLC had
9 voluntarily dismissed Fairchild from Superior Court of California, County of Los
10 Angeles, West Covina Superior Court civil case **24WCUD02475**. Accordingly, Pursuant
11 to the United States Supreme Court case *Monell v. Department of Social Services*, 436
12 U.S. 658, 98 S.Ct 2018, 56 L.Ed.2d 611 (1978) County of Los Angeles will be held liable
13 for the reckless, fraudulent, and unconstitutional actions of its employee, Leslie Bouvier
14 Gutierrez **(paid approximately \$ 270,000 by the County of Los Angeles in 2024)**

15
16 Several times during the years 2015, 2016, 2017, and 2018 County of Los Angeles
17 has willfully, recklessly, knowingly, deliberately, carelessly, wantonly, fraudulently, and
18 callously allowed legal document process servers employed by County of Los Angeles's
19 longstanding co-conspirators Rapid Legal, ABC Legal, One Legal, Pro Legal, United
20 Legal, Countywide Process LLC, One Legal, and many other companies to impede,
21 block, and obstruct Superior Court of California, County of Los Angeles, Stanley Mosk
22 Superior Court entrances, exits, outside of Stanley Mosk courthouse handicap ramps,
23
24
25

26 JANUARY 6, PUBLIC COMMENT

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4 **COUNTY OF LOS ANGELES PUBLIC PROPERTY MUST BE REMOVED**
5 **IMMEDIATELY!**

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7 **As detailed in her civil rights complaint, Fairchild experienced numerous**
8 **instances of disability discrimination by legal process servers and the County of Los**
9 **Angeles. At the same time, she was present at the handicap ramp independently,**
10 **and unable to proceed to the second floor of the Stanley Mosk Courthouse due to**
11 **the County of Los Angeles recklessly allowing individuals to block her path on the**
12 **outside ADA handicap ramp, and also on numerous occasions, prevented Fairchild**
13 **from getting proper and needed exercise on the handicap ramp. At the same time,**
14 **she was present at the Stanley Mosk Superior Courthouse.**

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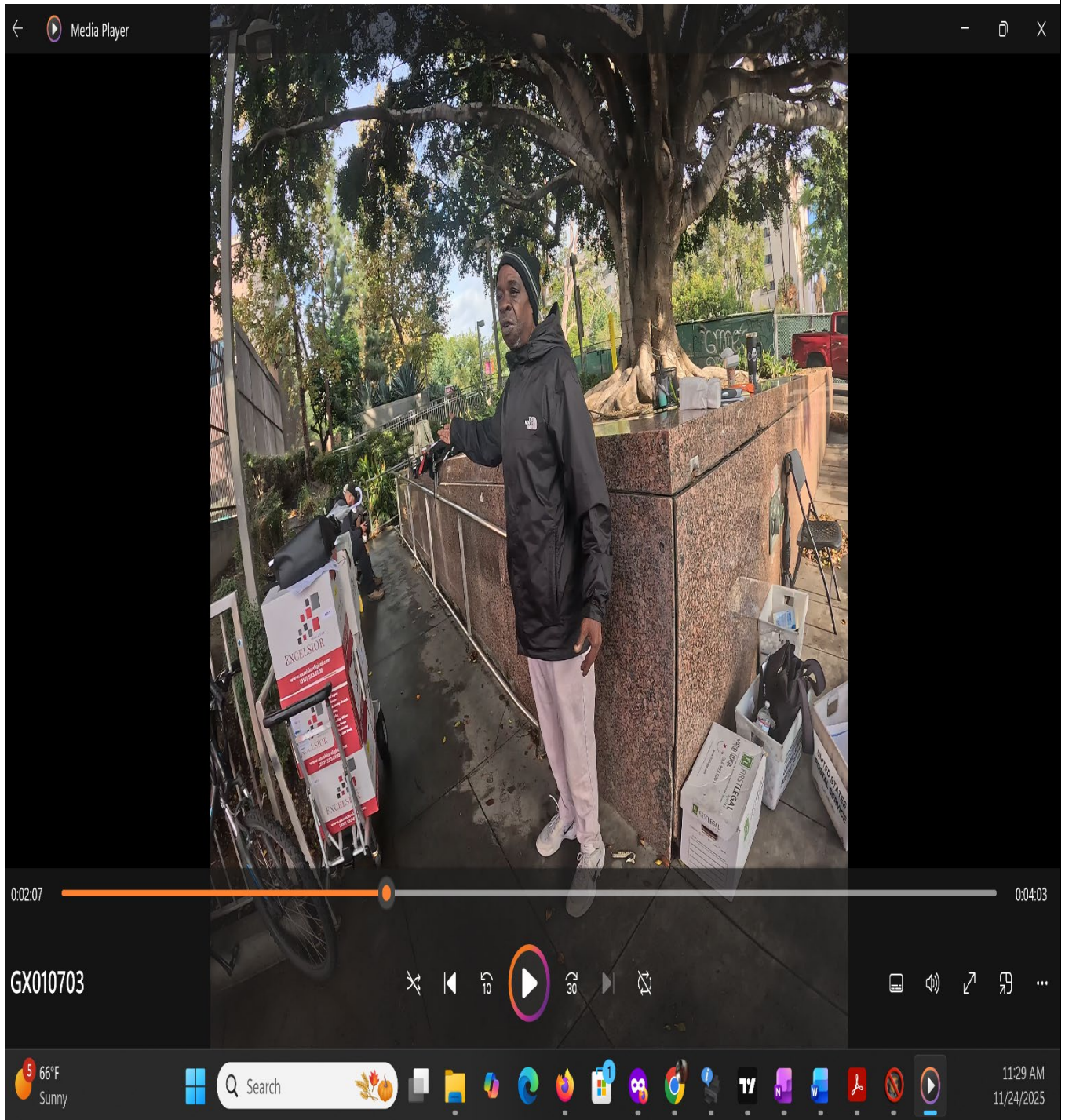
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ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344



Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

1 *The above image you see is the Stanley Mosk Courthouse handicap ramp complained*
2 *upon to this deliberately indifferent County of Los Angeles Board of Supervisors. Due to the*
3 *County of Los Angeles continuing to recklessly allow individuals working for its in collusion with*
4 *legal process server companies' employees. On November 17, 2025, Alison Helen Fairchild*
5 *declined to go to the Stanley Mosk Courthouse since she knew individuals would be impeding and*
6 *blocking her path to the second-floor entrance of the Stanley Mosk Courthouse. COUNTY OF*
7 *LOS ANGELES IS GETTING READY TO GET SUED! AND ITS FIVE BOARD OF*
8 *SUPERVISORS ARE NOT ENTITLED TO ANY SHAPE, FORM, OR TYPE OF IMMUNITY!*
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26 JANUARY 6, PUBLIC COMMENT

27 ALISON HELEN FAIRCHILD
28 1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

**CLEAR AND CONVINCING EVIDENCE OF COUNTY OF LOS
ANGELES' S LIABILITY RECORDED ON DECEMBER 2, 2025**

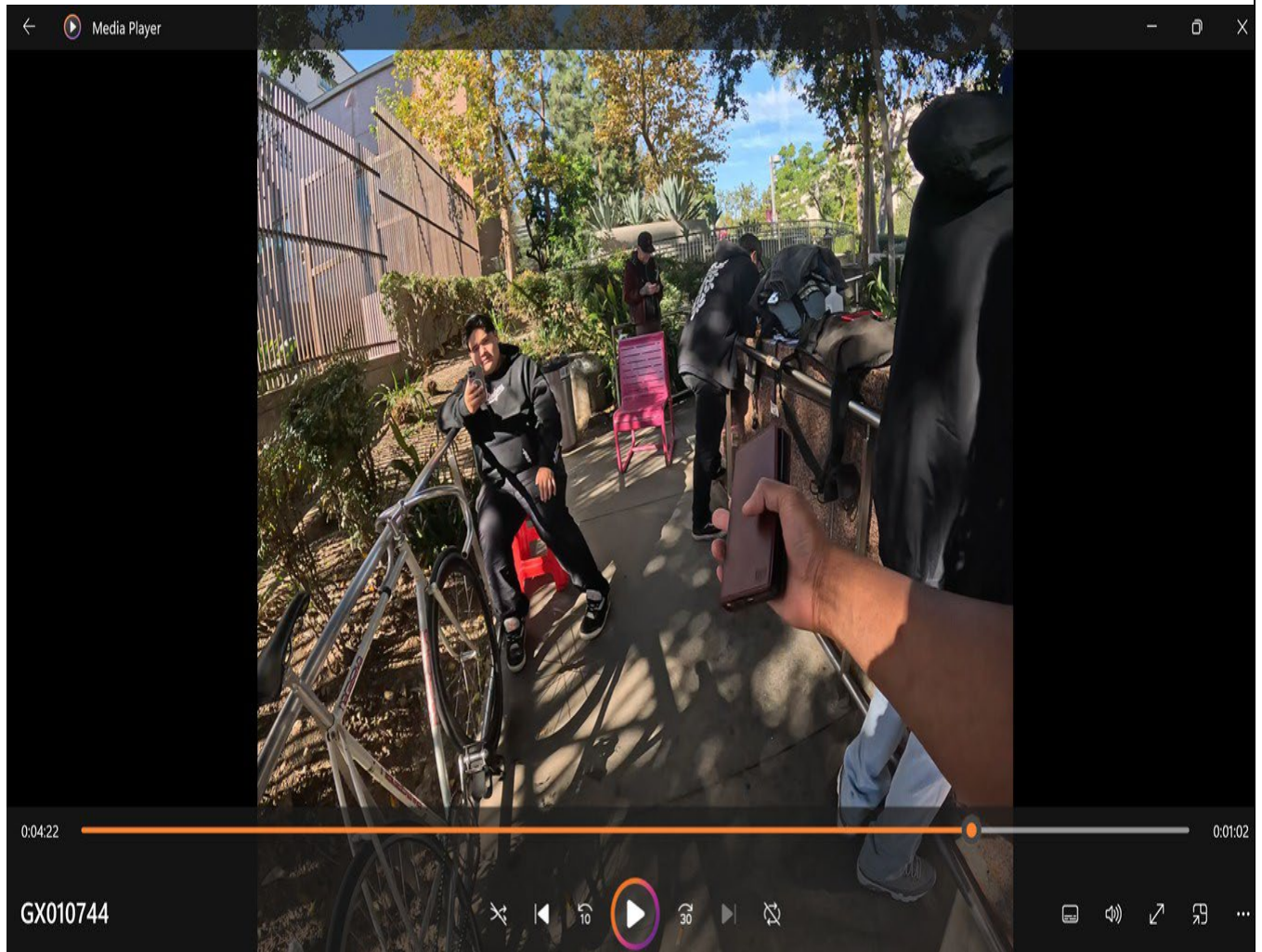
JANUARY 6, PUBLIC COMMENT

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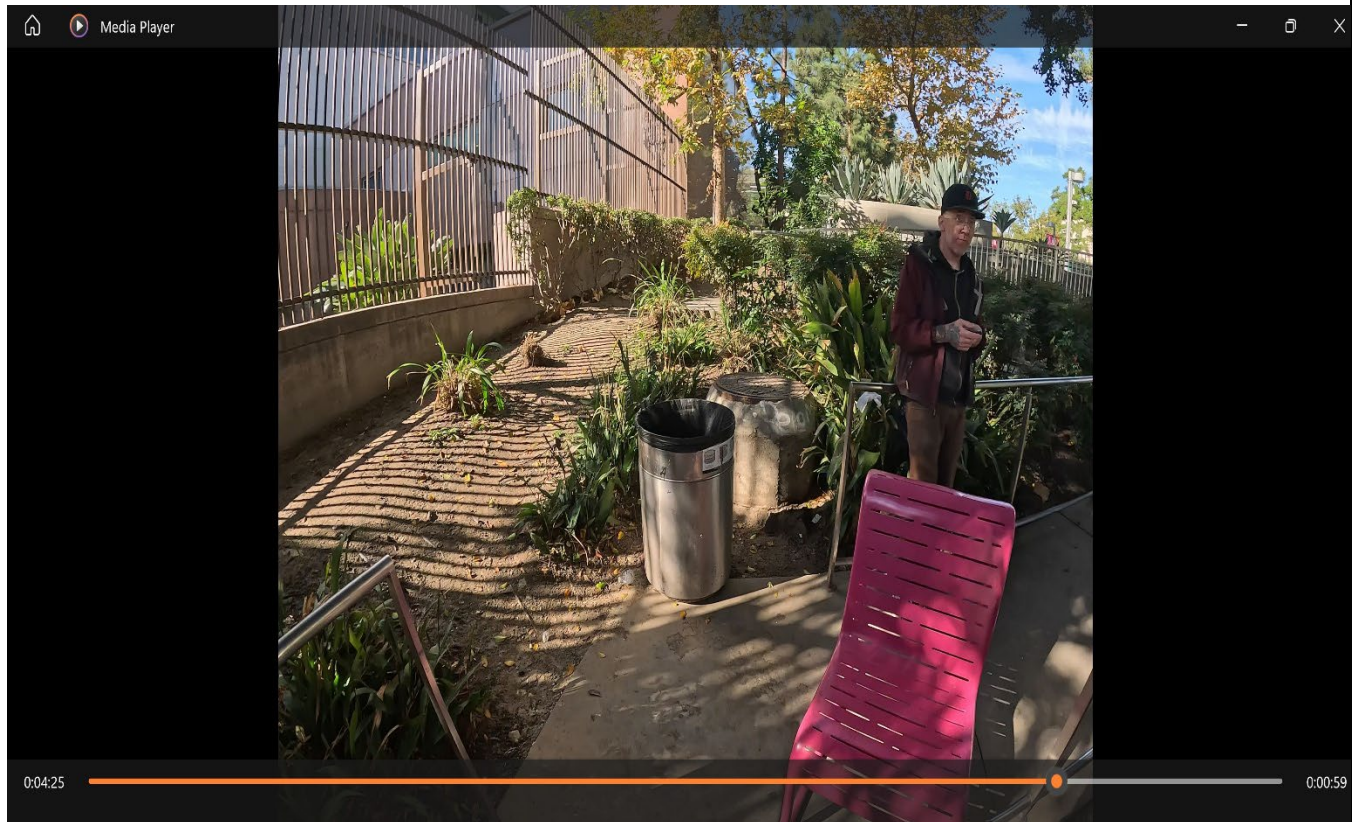
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1 CLEAR AND CONVINCING EVIDENCE OF COUNTY OF LOS ANGELES'S LIABILITY RECORDED ON
2 DECEMBER 5, 2025
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26 JANUARY 6, PUBLIC COMMENT
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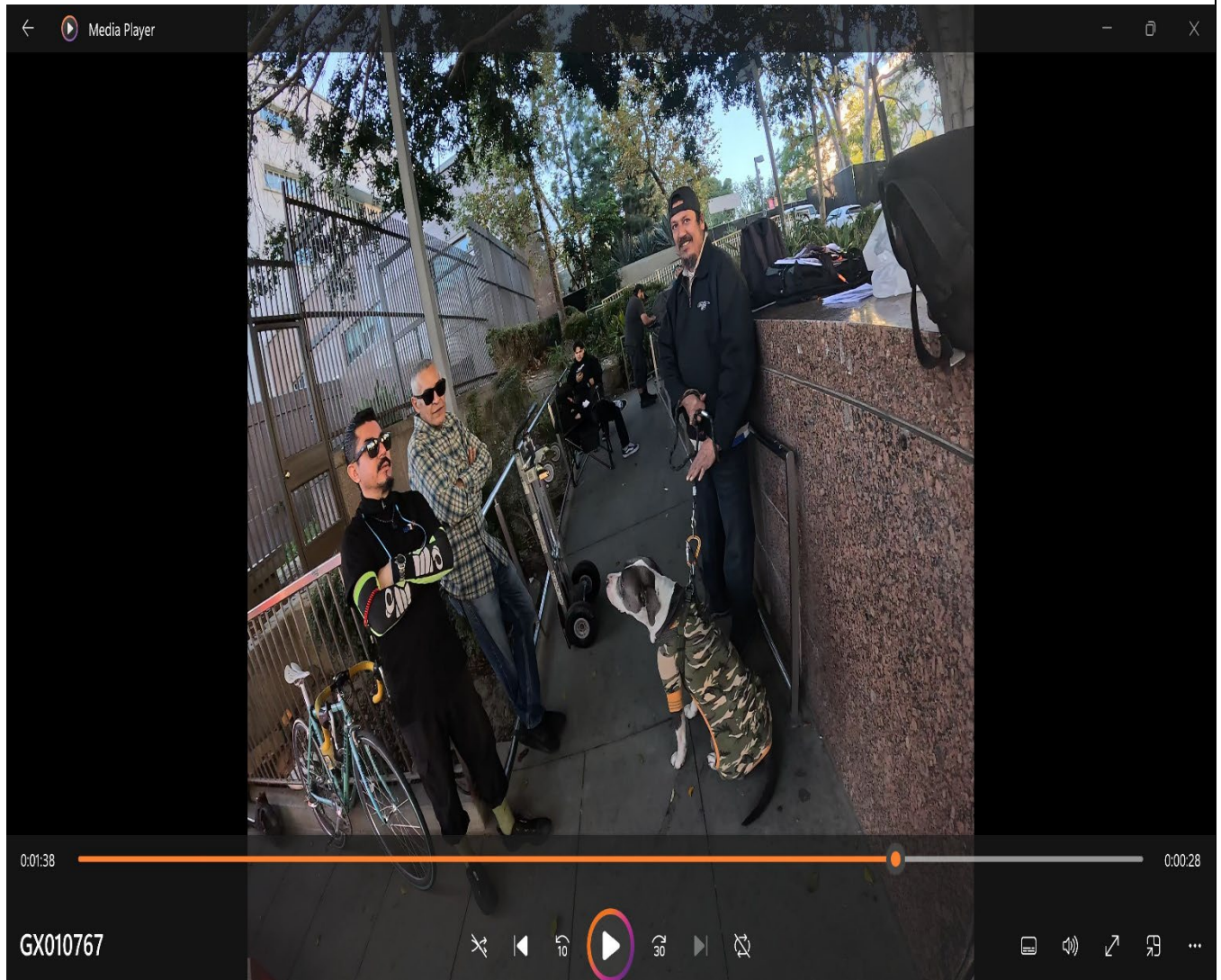
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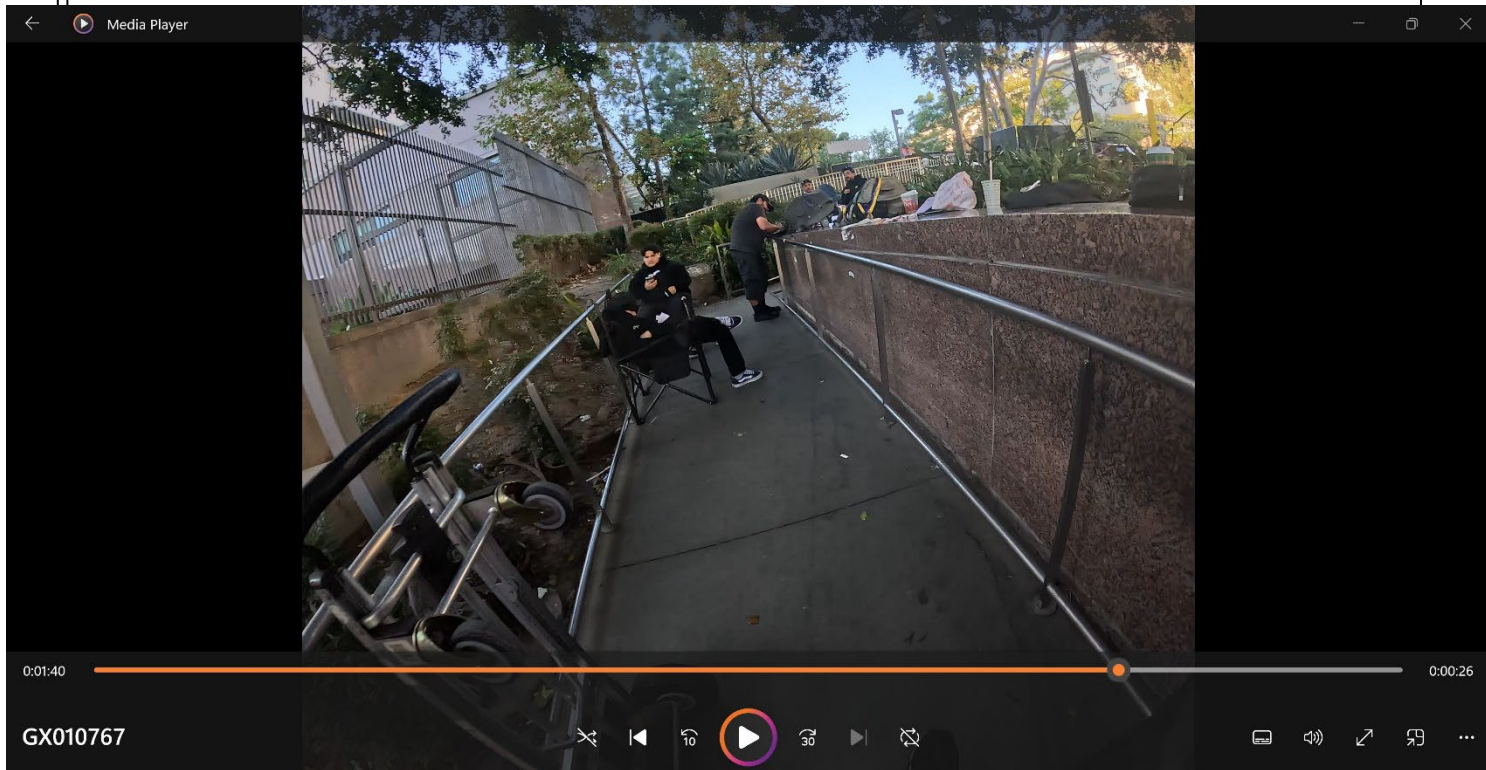
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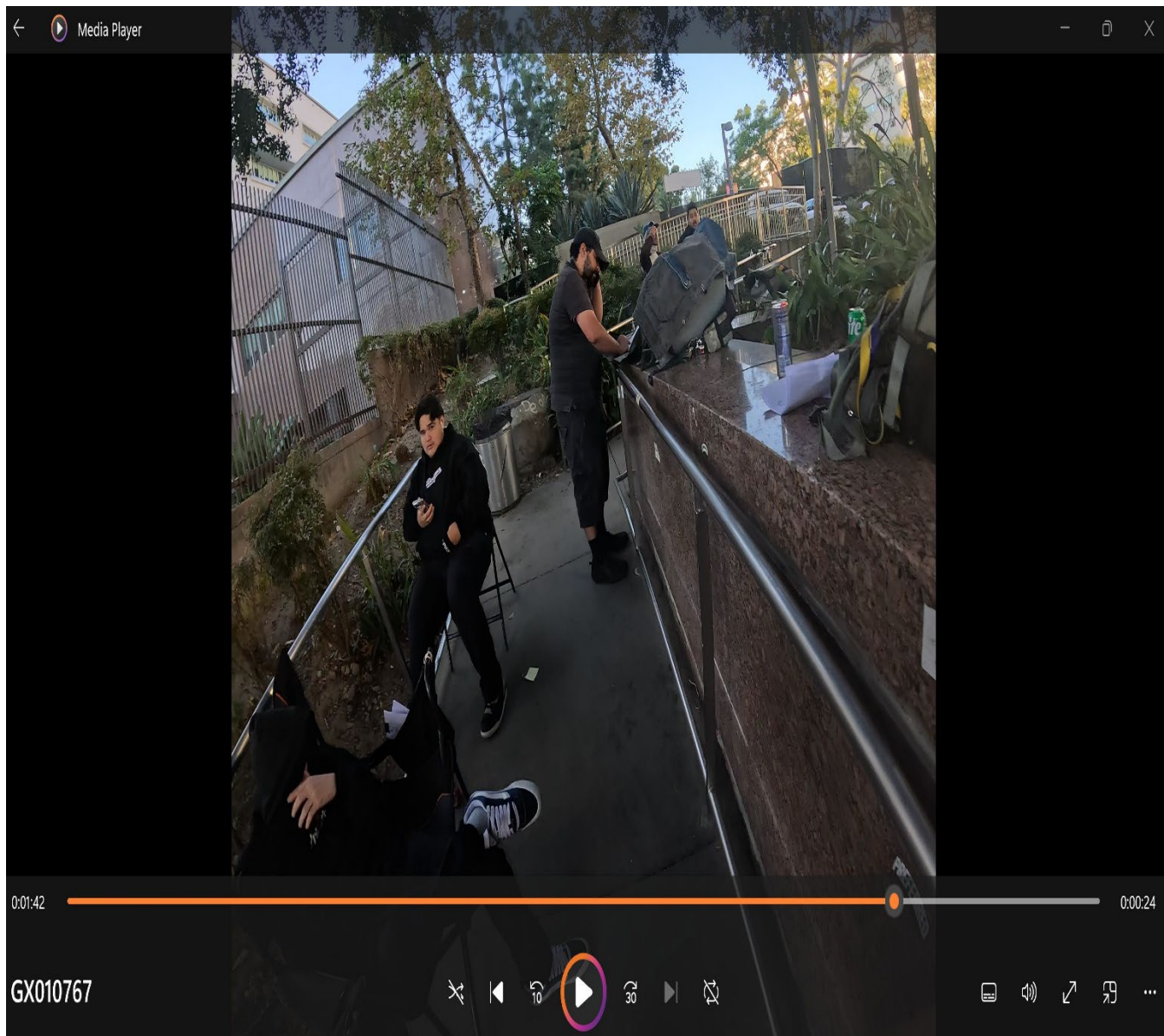
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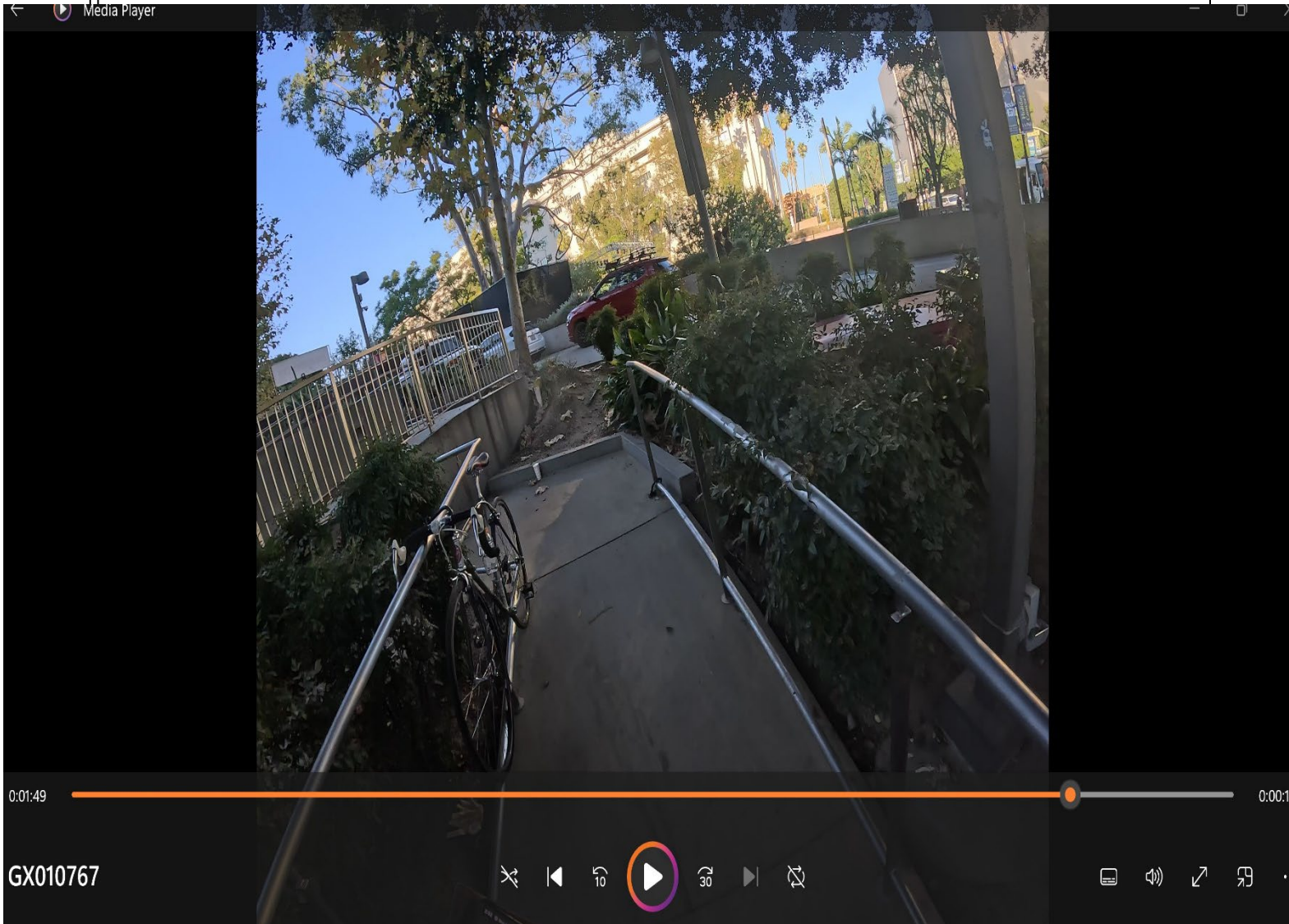
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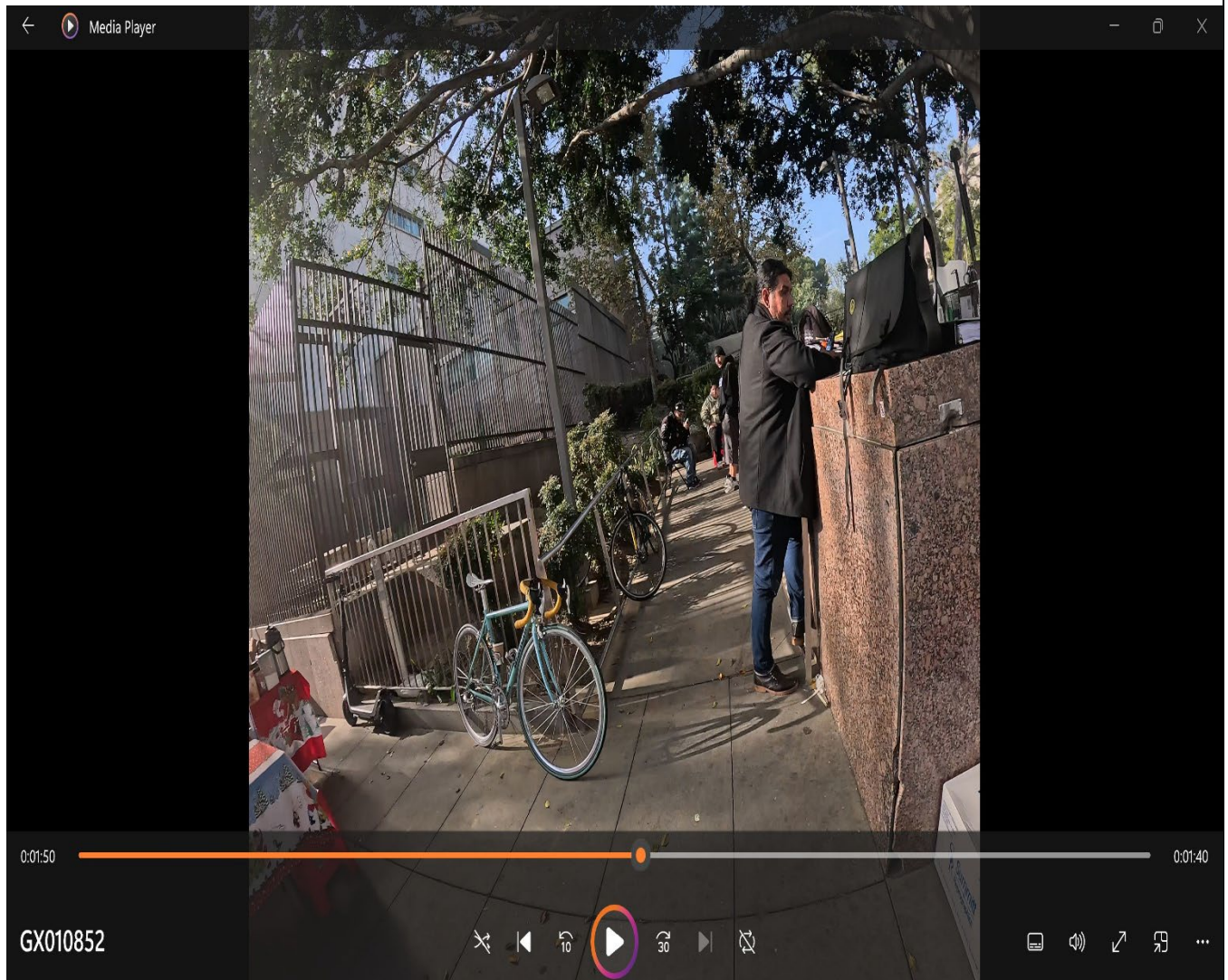


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JANUARY 6, PUBLIC COMMENT

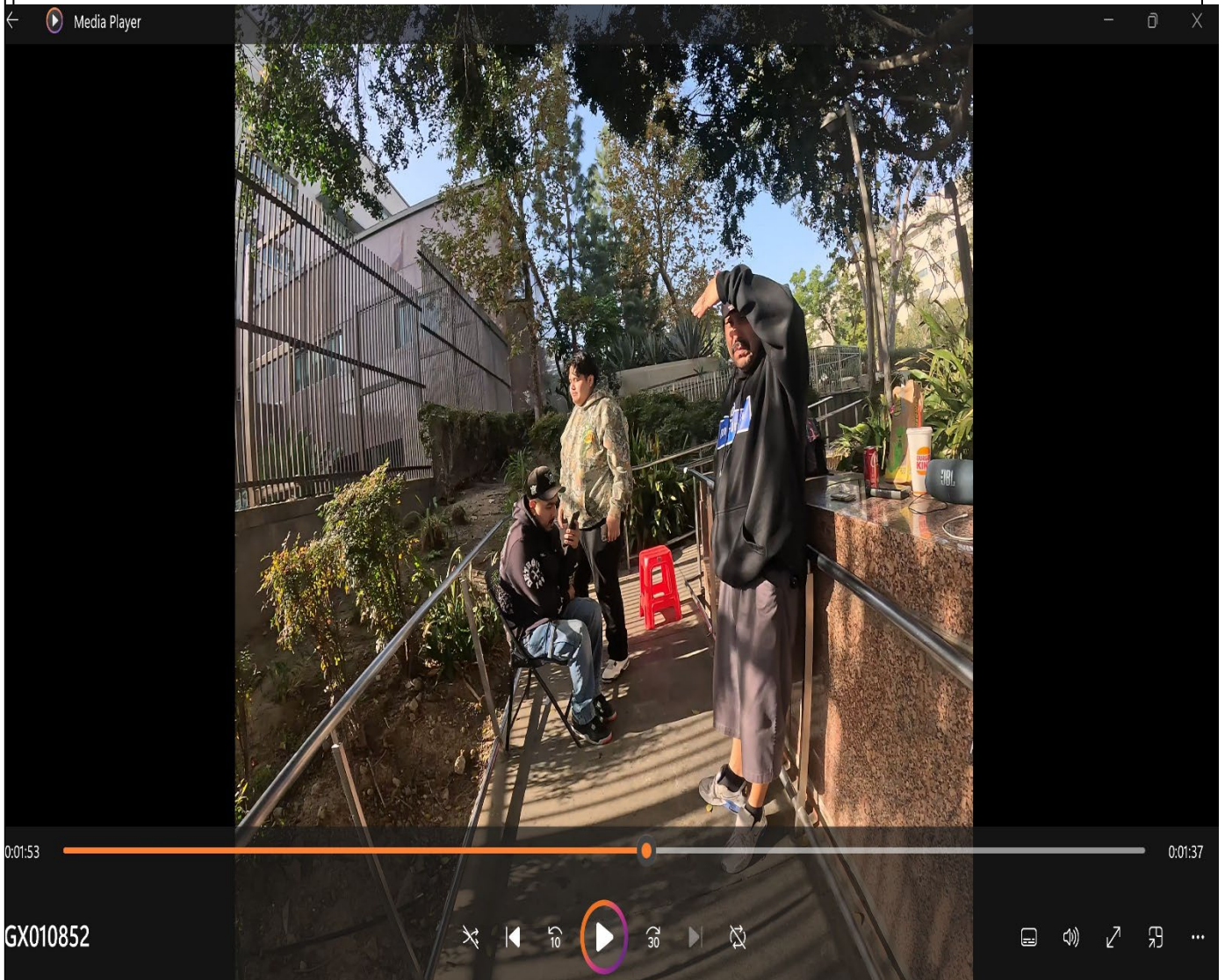
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Phone: 206.471.1344

CLEAR AND CONVINCING EVIDENCE OF COUNTY OF LOS ANGELES'S LIABILITY RECORDED ON DECEMBER 17, 2025



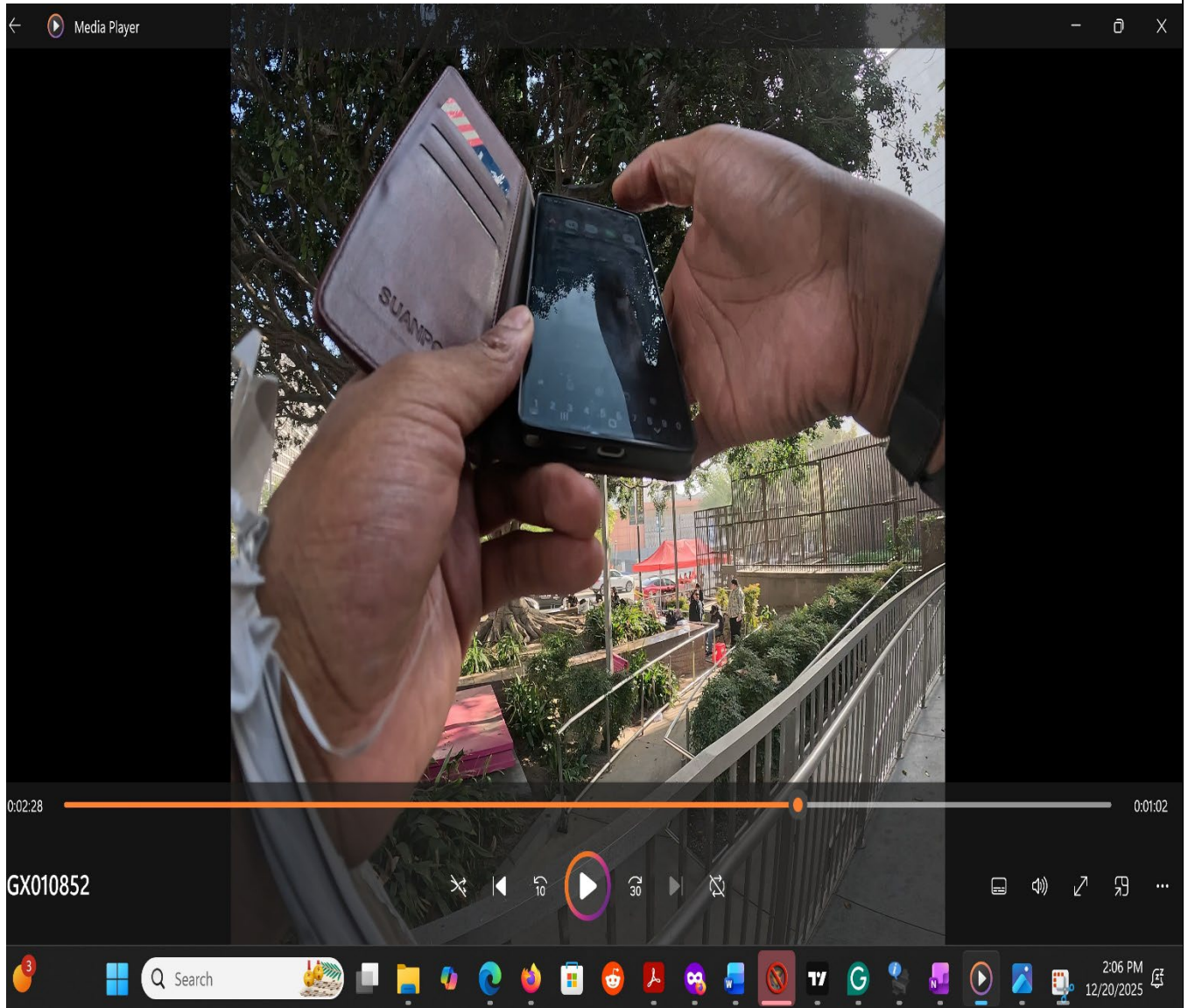
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JANUARY 6, PUBLIC COMMENT

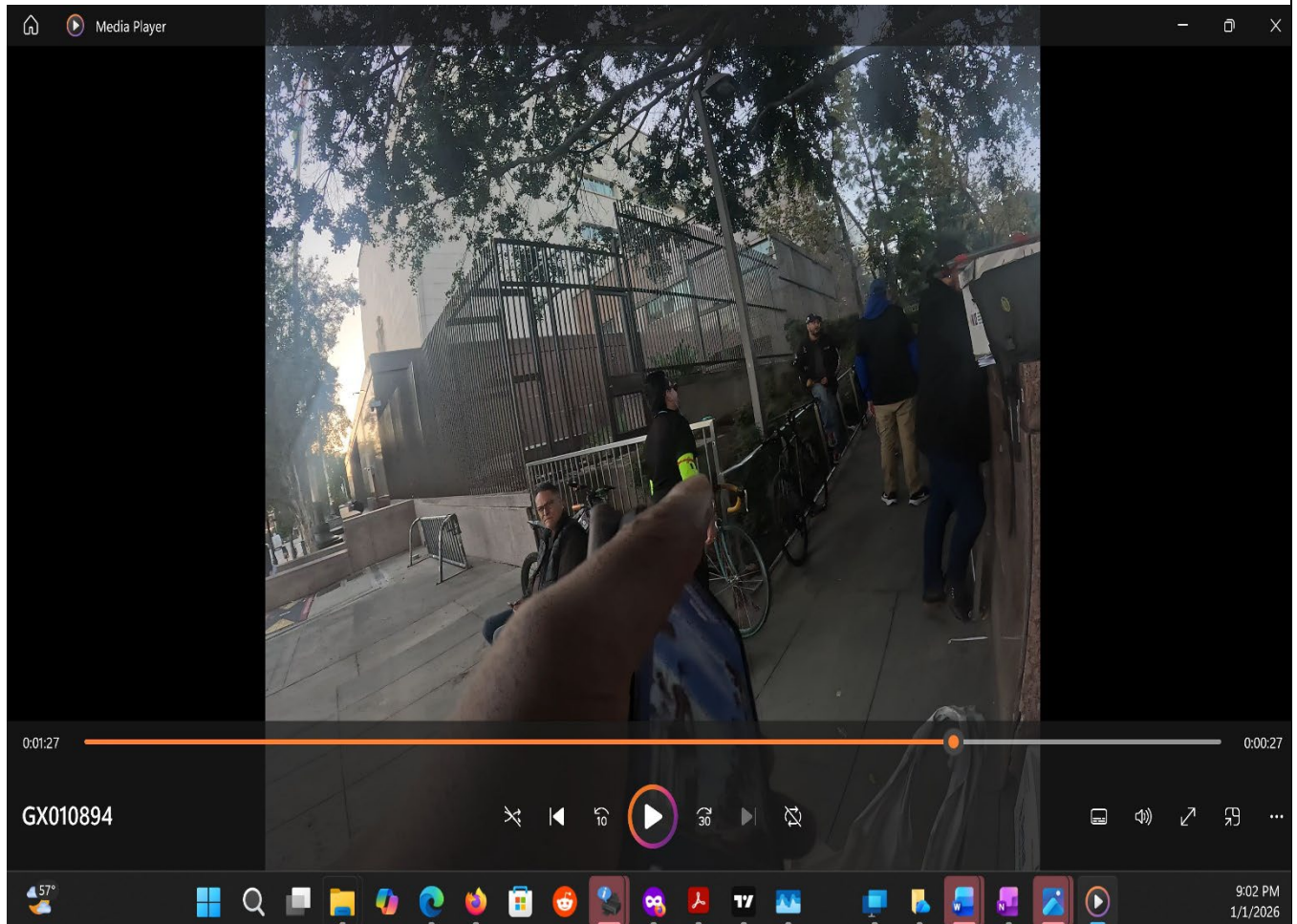
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JANUARY 6, PUBLIC COMMENT

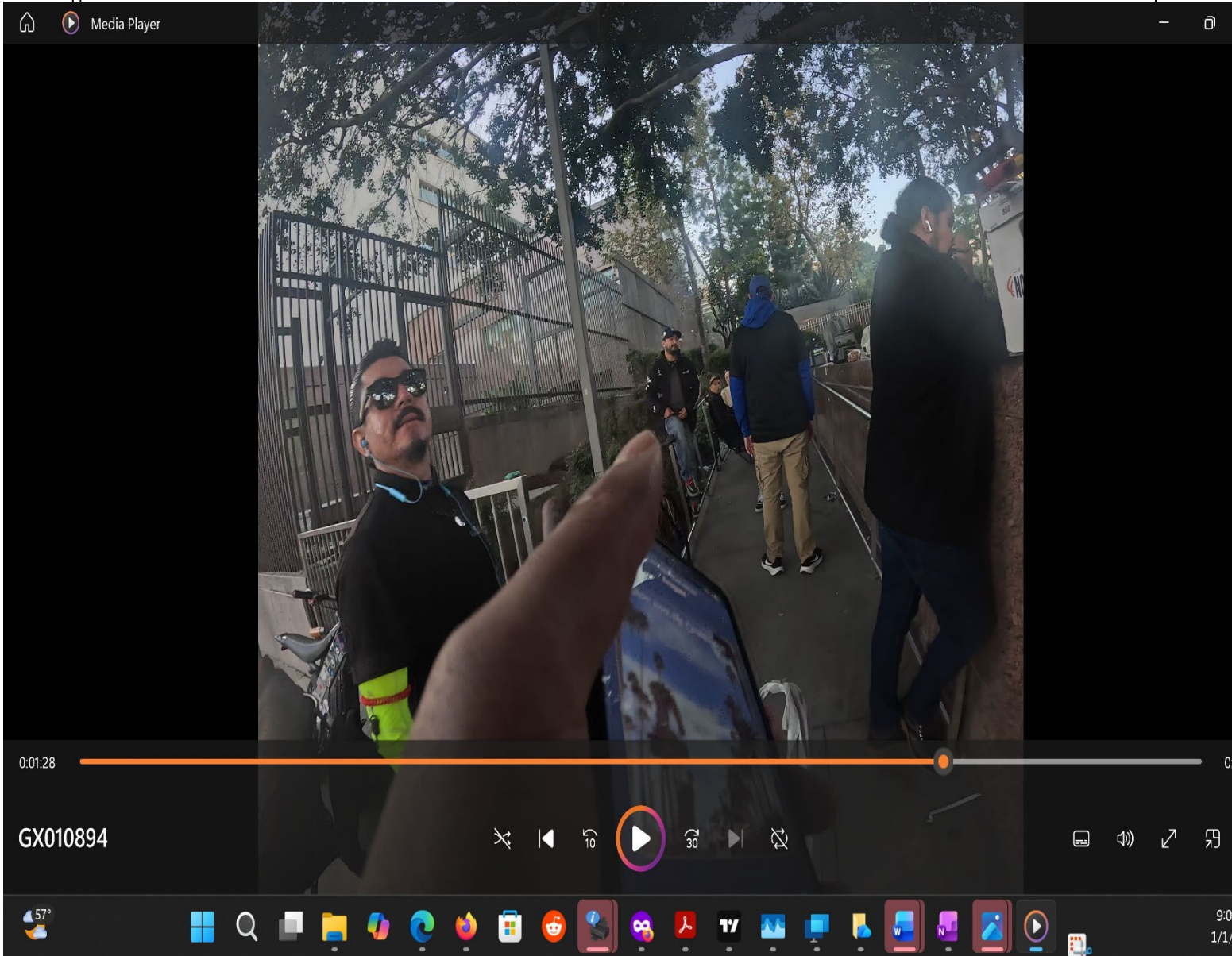
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1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
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CLEAR AND CONVINCING EVIDENCE OF COUNTY OF LOS ANGELES'S LIABILITY RECORDED ON DECEMBER 29, 2025



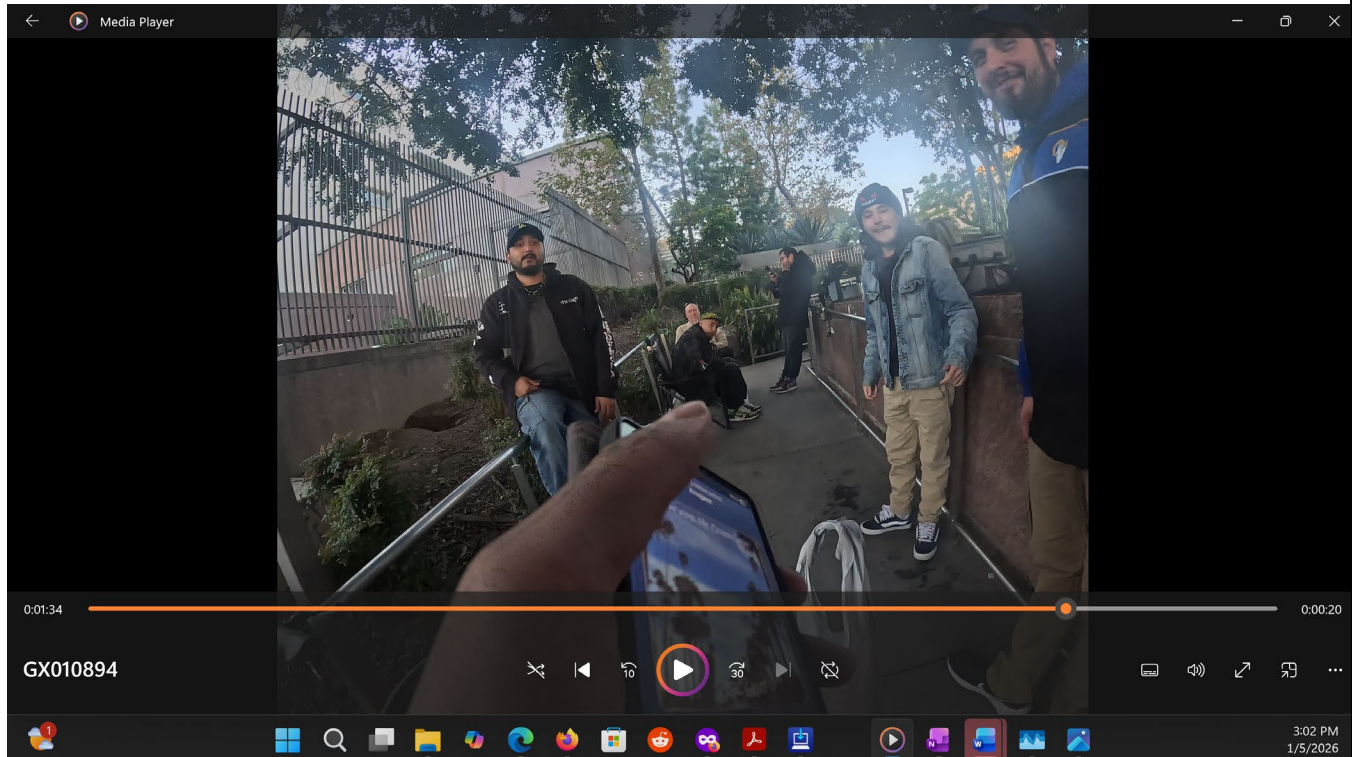
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ALISON HELEN FAIRCHILD
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JANUARY 6, PUBLIC COMMENT

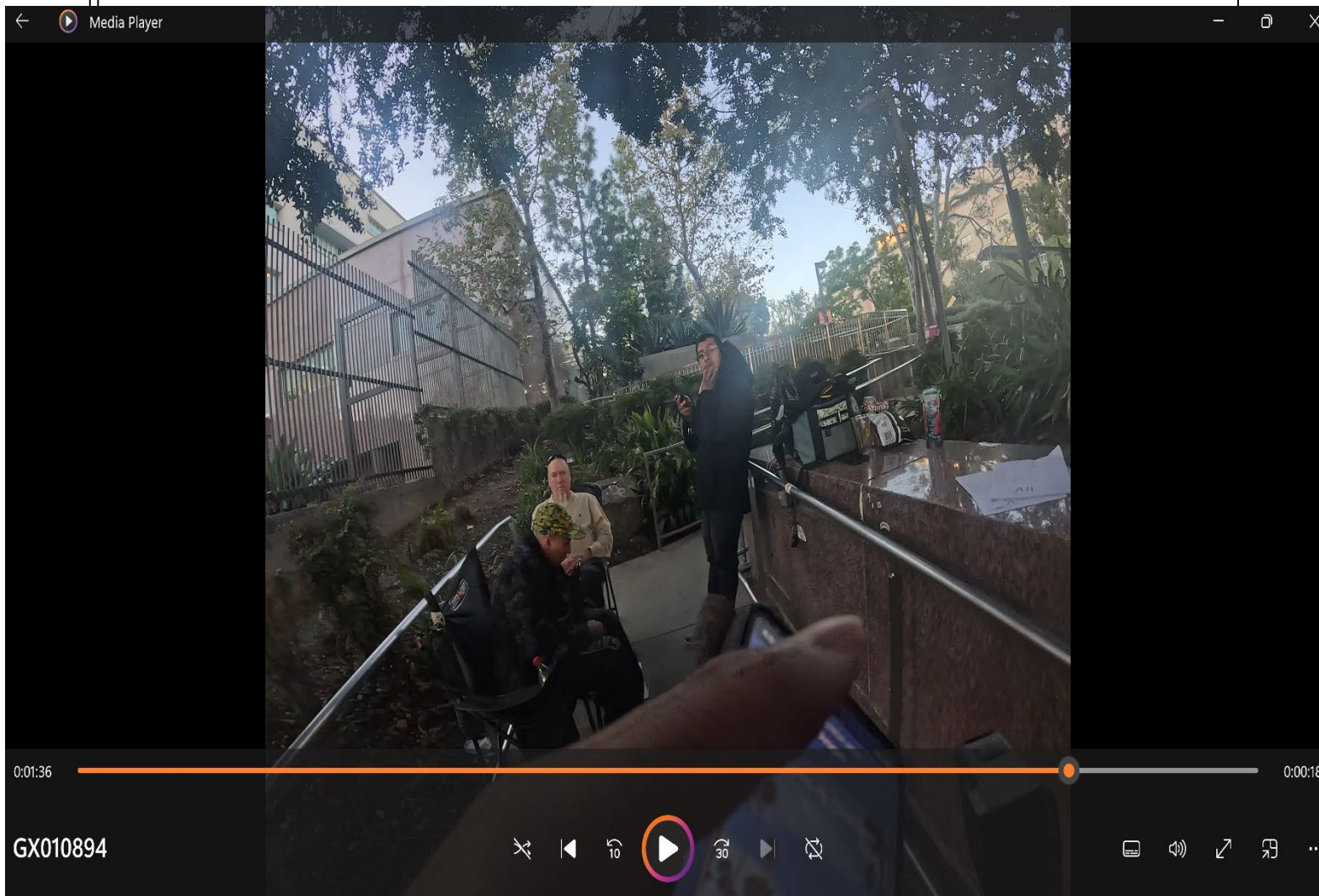
ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344



THE INDIVIDUAL IN THE LIGHT BLUE JEAN COAT IS HOLDING DRUG PARAPHERNALIA IN HIS HANDS! INDIVIDUALS COUNTY OF LOS ANGELES ALLOWS TO BLOCK THE ADA STALEY MOSK HANDICAP RAMP WERE WITNESSED DOING CRYSTAL METHAMPHETAMINE AND SMOKING MARIJUANA ON DECEMBER 29, 2025, BY AROGANT HOLLYWOOD!

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344



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ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

1 DECEMBER 2, 2025 YOUTUBE VIDEO RECORDING PROVING CLEAR AND CONVINCING EVIDENCE OF RAPID
2 LEGAL, ONE LEGAL, INFOTRAK AND PROCEED'S (STILL DOING BUSINESS AS COUNSEL PRESS INC, A DELAWARE
3 CORPORATION) AND COUNTY OF LOS ANGELES'S LIABILITY
4

5 https://youtu.be/TV_SVbeCGmQ?si=x88lO3C5alqyknGR
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10 DECEMBER 5, 2025 YOUTUBE VIDEO RECORDING PROVING CLEAR AND CONVINCING EVIDENCE OF RAPID
11 LEGAL, ONE LEGAL, INFOTRAK AND PROCEED'S (STILL DOING BUSINESS AS COUNSEL PRESS INC, A DELAWARE
12 CORPORATION), AND COUNTY OF LOS ANGELES'S LIABILITY.
13

14 https://youtu.be/chU0wU4_UyE?si=AawP908vDT7nn7Np
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19 DECEMBER 17, 2025 YOUTUBE VIDEO RECORDING PROVING CLEAR AND CONVINCING EVIDENCE OF RAPID
20 LEGAL, ONE LEGAL, INFOTRAK, AND PROCEED'S (STILL DOING BUSINESS AS COUNSEL PRESS INC, A DELAWARE
21 CORPORATION), AND COUNTY OF LOS ANGELES'S LIABILITY
22

23 <https://youtu.be/VNaqVTQkJFw?si=SARawgtDBRUCuE1V>
24
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26 JANUARY 6, PUBLIC COMMENT

27 ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
28 Phone: 206.471.1344

1 **DECEMBER 29, 2025 YOUTUBE VIDEO RECORDING PROVING CLEAR AND CONVINCING EVIDENCE OF**
2 **RAPID LEGAL, ONE LEGAL, INFOTRAK, AND PROCEED'S (STILL DOING BUSINESS AS COUNSEL PRESS**
3 **INC, A DELAWARE CORPORATION), AND COUNTY OF LOS ANGELES'S LIABILITY.**

4
5 **GX010894 (12/29/2025, DEFENDANTS**
6 **CREATED A NEW CIVIL RIGHTS**
7 **COMPLAINT BY NOT REMOVING**
8 **INDIVIDUALS)**
9

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13 <https://youtu.be/YNtuUSqpwo4?si=XEncZ30d5P2bHYRO>
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26 **JANUARY 6, PUBLIC COMMENT**

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28 **1308 East Colorado Blvd. |Pasadena, CA. 91106**
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

1 **GX010899 (ONE OF DEFENDANTS'**
2 **EMPLOYEES IS HEARD ON VIDEO**
3 **RECORDING SAYING " AH, THROW ME A**
4 **METH PIPE**
5

6
7
8
9
10 <https://youtu.be/hxMpo5qJmjY?si=JluH2u1fOggOFK5T>
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15 COUNTY OF LOS ANGELES, ITS COUNTY COUNSEL ATTORNEYS,
16 ITS LASD EXECUTIVES, AND ITS FIVE BOARD OF SUPERVISORS
17 ARE AGAIN BEING COMMANDED TO IMMEDIATELY REMOVE
18 ALL INDIVIDUALS FROM THE OUTSIDE STANLEY MOSK
19 SUPERIOR COURTHOUSE HANDICAP RAMP LOCATED AT 111
20 NORTH HILL STREET, LOS ANGELES, CA 90012.
21
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JANUARY 6, PUBLIC COMMENT

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COUNTY OF LOS ANGELES DPSS EXECUTIVES

Tuesday, November 25, 2025
1:12 AM

DIRECTOR OF DPSS & ALL ITS SERVICES AND DIVISIONS

DOCTOR JACQUELINE ("JACKIE") E. CONTRERAS

IN 2024 JACKIE'S REGULAR PAY WAS \$ 412,401 & HER TOTAL PAY WITH
OTHER PAY AND BENEFITS PAY WAS \$ 637,126

jackiecontreras@dpss.lacounty.gov

Family_Social_Services@ceo.lacounty.gov

MICHAEL J. SYLVESTER II, CHIEF DEPUTY AND CIO

IN 2024 MICHAEL'S REGULAR PAY WAS \$ 331,123 & HIS TOTAL PAY WITH
OTHER PAY AND BENEFITS PAY WAS \$ 554,276

michaelsylvester@dpss.lacounty.gov

<https://www.linkedin.com/in/michael-sylvester-96a12614/>

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

GABRIELA G. HERRERA, SPECIAL ASSISTANT/ BOARD LIAISON

IN 2024 GABRIELA'S REGULAR PAY WAS \$ 197,436 & HIS TOTAL PAY WITH
OTHER PAY AND BENEFITS PAY WAS \$ 324,853

GabrielaHerrera@dpss.lacounty.gov

SHERISE C. ENGLISH, ADMINISTRATIVE SERVICES DIVISION MANAGER

sheriseenglish@dpss.lacounty.gov

CHANWANTHA SAMANTHA LIMON, ADMINISTRATIVE SERVICES DIVISION MANAGER

chanwantha.limon@dpss.lacounty.gov

CHERYL WARD, REGIONAL SERVICES ADMINISTRATOR, NORTH REGION 1

cheryward@dpss.lacounty.gov

VICKI BARBER, REGIONAL SERVICES ADMINISTRATOR, EAST REGION II

vickibarber@dpss.lacounty.gov

SONIA PEREZ, REGIONAL SERVICES ADMINISTRATOR, WEST METRO REGION III

soniaperez@dpss.lacounty.gov

AIDA KARAPETYAN, REGIONAL SERVICES ADMINISTRATOR, SOUTH REGION IV

JANUARY 6, PUBLIC COMMENT
aidakarapetyan@dpss.lacounty.gov

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

DIVISION ONE LEADERS (HEADQUARTERS GLENDALE)

LILIA M . ERVITI, DIVISION 1 CHIEF

liliaErviti@dpss.lacounty.gov

HAREGNESH ADAMU, HSA I

HaregneshLemma@dpss.lacounty.gov

MARY ESTER GARCIA, HSA I

MaryEstherGarcia@dpss.lacounty.gov

DARRYL BAKER, HSA 1

DarrylBaker@dpss.lacounty.gov

(PASADENA-HUB)

JUNIUS PERKINS, HSA 1

JuniusPerkins@dpss.lacounty.gov

NASARIA MASON, HSA 1

NasariaMason@dpss.lacounty.gov

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

1 IRENE HUIZAR, DIVISION CHIEF

2 IreneHuizar@dpss.lacounty.gov

4
5 SAN FERNANDO HUB

6 ROCIO FRAGOSO, HSA 2

7 RocioFragoso@dpss.lacounty.gov

8
9 MICHELLE DEVIN, ELIGIBILITY SUPERVISOR

10 michelleDevin@dpss.lacounty.gov

11
12 EAST VALLEY HUB (VAN NUYS)

13 EDUARD TARANIAN, HSA 3 (ONE POSITION UNDER DIVISION CHIEF)

14 EduardTaranian@dpss.lacounty.gov

15
16
17 PATRICIA ANDRADE, HSA 2

18 PatriciaAndrade@dpss.lacounty.gov

19
20
21 GISELDA A. LOZANO, ELIGIBILITY SUPERVISOR

22 GriseldaLozano@dpss.lacounty.gov

23
24
25
26 JANUARY 6, PUBLIC COMMENT

27 ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
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1 GERRY BONILLA, DIVISION CHIEF & PROGRAM COMPLIANCE

2 GerryBonilla@dpss.lacounty.gov

3 <https://www.linkedin.com/in/gerry-bonilla-90a86737>

4
5 SANTA CLARITA HUB

6 HILDA B. OCHOA, ELIGIBILITY SUPERVISOR

7 HildaOchoa@dpss.lacounty.gov

8
9
10 LANCASTER HUB

11
12 BLANCA L. BAIRE, HSA 1

13 BlancaBaires@dpss.lacounty.gov

14
15 TERESA ARMOUR, HSA 1

16 TeresaArmour@dpss.lacounty.gov

17
18 PATRICIA GUEVARA, HSA 3 (ONE POSITION UNDER DIVISION CHIEF)

19 PatriciaGuevara@dpss.lacounty.gov

20
21 RICKY O. ESPANA, HSA 3 (ONE POSITION UNDER DIVISION CHIEF)

22 RickyEspana@dpss.lacounty.gov

23
24
25

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ELIZABETH MALDONADO, ELIGIBILITY SUPERVISOR

OWN ElizabethMaldonado@dpss.lacounty.gov

WEST VALLEY HUB

IMELDA BAGA, HSA 3 (ONE POSITION UNDER DIVISION CHIEF)

ImeldaBaga@dpss.lacounty.gov

LUIS MORALES, HSA 1

LuisMorales@dpss.lacounty.gov

FRANCES ALFARO (COULD BE RETIRED)

FrancesAlfaro@dpss.lacounty.gov

DIVISION II

BENNY LIANG, DIVISION CHIEF (RETIRED)

WILSHIRE DISTRICT HUB

TABENYANG NDIPAGBOR, HSA III (ONE POSITION UNDER DIVISION CHIEF)

TabenyangNdipagbor@dpss.lacounty.gov

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PATRICIA JIMENEZ, HSA 1

PatJimenez@dpss.lacounty.gov

LUZ PARDINI, HSA 3 (ONE POSITION UNDER DIVISION CHIEF)

LuzPardini@dpss.lacounty.gov

EXPOSITION PARK HUB

WANDA R. JAMES, HSA 1

WandaJames@dpss.lacounty.gov

IGNACIO MENDEZ, HSA 2

IgnacioMendez@dpss.lacounty.gov

ANGELA ("ANGIE") L. CHEA, HSA III (ONE POSITION UNDER DIVISION CHIEF)

AngieChea@dpss.lacounty.gov

CIVIC CENTER

MARIELA DE LA TORRE, HSA III (ONE POSITION UNDER DIVISION CHIEF)

MarielaDeLaTorre@dpss.lacounty.gov

ALEXANDER MONT, HSA 2

AlexanderMont@dpss.lacounty.gov

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SYLVIA CHASCO, HSA 3

SylviaChasco@dpss.lacounty.gov

(MEDI-CAL OUTREACH HUB) (LOCATED IN EL MONTE)

ANAHIT AMBARYAN, HSA 1

AnahitAmbaryan@dpss.lacounty.gov

MINERVA N. DE LA CRUZ, HSA III (ONE POSITION UNDER DIVISION CHIEF)

MinervaDeLaCruz@dpss.lacounty.gov

POMONA HUB

CONRAD TRINIDAD, HSA 1

ConradTrinidad@dpss.lacounty.gov

NANCY A. RICO, HSA III (ONE POSITION UNDER DIVISION CHIEF)

NancyRico@dpss.lacounty.gov

ANNIE J. GABSTON-HOWELL, HSA 1

AnnieGabston-Howell@dpss.lacounty.gov

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ALISON HELEN FAIRCHILD
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Phone: 206.471.1344

COLIN NEAL, HSA III (ONE POSITION UNDER DIVISION CHIEF)

ColinNeal@dpss.lacounty.gov

METRO NORTH HUB

KARINE TIOUFENKTCHIAN, HSA 2

KarineTioufenktchian@dpss.lacounty.gov

JIRAIR ISSAGHOOLIAN, HSA 1

JirairIssaghoolian@dpss.lacounty.gov

KHANH VU, HAS III (ONE UNDER DIVISION CHIEF)

KhanhVu@dpss.lacounty.gov

MEDI-CAL LONG TERM CARE (LOCATED IN CITY OF INDUSTRY)

FRANCISCO FONSECA, HSA 1

FranciscoFonseca@dpss.lacounty.gov

JACKIE HONES, HSA 1

JackieHones@dpss.lacounty.gov

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ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
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Phone: 206.471.1344

MONIQUE NOLLNER, DIVISION CHIEF

MoniqueNollner@dpss.lacounty.gov

MEDI CAL MAIL IN HUB (LOCATED IN DOWNTOWN LOS ANGELES)

DAVID NGUYENDO, HSA 1

DavidNguyendo@dpss.lacounty.gov

CARMEN AVILES, HSA 1

CarmenAviles@dpss.lacounty.gov

LYNETTE LALONDE, HSA II

LynetteLalonde@dpss.lacounty.gov

ZARIK BEKMEZIAN, HSA III (ONE POSITION UNDER DIVISION CHIEF)

ZarikBekmezian@dpss.lacounty.gov

MEDI CAL HUB (HAWTHORNE)

MARIE E. HUNT, HSA 1

MarieHunt@dpss.lacounty.gov

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ALISON HELEN FAIRCHILD
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VICTOR THRASH, HSA 1

VictorThrash@dpss.lacounty.gov

ELSA RODRIGUEZ, HSA 1

ElsaRodriguez@dpss.lacounty.gov

FRANCY H. MERRITT, HSA III (ONE POSITION UNDER DIVISION CHIEF)

FrancyMerritt@dpss.lacounty.gov

DIVISION III

EL MONTE HUB

JONATHAN ("JON") MINATO, DIVISION CHIEF

JonMinato@dpss.lacounty.gov

ELVIRA NAVARRO, HSA I

ElviraNavarro@dpss.lacounty.gov

RENE LIMA, HSA I

Renelima@dpss.lacounty.gov

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Phone: 206.471.1344

1 NAG NGUYEN, HSA III (ONE POSITION UNDER DIVISION CHIEF)

2 HangNguyen@dpss.lacounty.gov

3
4 **EAST LOS ANGELES HUB**

5
6 BLANCA FIERRO-DUARTE, HSA I

7 BlancaFierro-Duarte@dpss.lacounty.gov

8
9 LUIS DE ALBA, HSA 1

10 LuisDeAlba@dpss.lacounty.gov

11
12
13 ANTHONY ("TONY") KWOK, HSA III (ONE POSITION UNDER DIVISION CHIEF)

14 TonyKwok@dpss.lacounty.gov

15
16 CUDAHY HUB (LOCATED IN SOUTHEASTERN COUNTY OF LOS ANGELES)

17
18 PATRICIA RAMOS ALVAREZ, HSA I

19 PatriciaRamosAlvarez@dpss.lacounty.gov

20
21
22 CARMEN LOPEZ, HSA 1

23 CarmenLopez@dpss.lacounty.gov

24
25

JANUARY 6, PUBLIC COMMENT

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27 1308 East Colorado Blvd. | Pasadena, CA. 91106
28 Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

REBBECA K. GIAO, HSA I

RebbecaGiao@dpss.lacounty.gov

ELIZABETH HUEZO, HSA III

ElizabethHuezo@dpss.lacounty.gov

METRO FAMILY HUB (LOCATED IN DOWNTOWN LOS ANGELES)

EDUARDO MAREDO, HSA 1

EduardoMacedo@dpss.lacounty.gov

ACERET ESCALANTE, HSA 1

AceretEscalante@dpss.lacounty.gov

LUZ M. DUCTOC, HSA III (ONE POSITION UNDER DIVISION CHIEF)

LuzDuctoc@dpss.lacounty.gov

METRO EAST (LOCATED IN SOUTH CENTRAL LOS ANGELES)

TANGELA R. STRONG, HSA 1,

TangelaStrong@dpss.lacounty.gov

JANUARY 6, PUBLIC COMMENT

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1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

MARIA O. RIVAS, HSA 1

MariaRivas@dpss.lacounty.gov

JANICE NAVA, HSA III (ONE POSITION UNDER DIVISION CHIEF)

JaniceNava@dpss.lacounty.gov

HAYDEE SARMIENTO, HSA III (ONE POSITION UNDER DIVISION CHIEF)

HaydeeSarmiento@dpss.lacounty.gov

GERARDO MURRIETA, HSA III (ONE POSITION UNDER DIVISION CHIEF)

GerardoMurrieta@dpss.lacounty.gov

LINCOLN HEIGHTS METRO HUB

KARMEN BABAYAN, ASM 1

KarmenBabayan@dpss.lacounty.gov

ELMER QUINTANILLA, CLERK OF DIVISION CHIEF

ElmerQuintanilla@dpss.lacounty.gov

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

FLORENCE HUB

CHLOE AKMAL, HSA 1

ChloeAkmal@dpss.lacounty.gov

RAFAEL NAVA, HSA II

RafaelNava@dpss.lacounty.gov

JAIME SANTOS, HSA I

JaimeSantos@dpss.lacounty.gov

JEAN HERNANDEZ, HSA III (ONE POSITION UNDER DIVISION CHIEF)

JeanHernandez@dpss.lacounty.gov

SAN GABRIEL VALLEY HUB

EDVIN ARBURUA, HSA I

EdvinArburua@dpss.lacounty.gov

OLGA MIRANDA, HSA III (ONE POSITION UNDER DIVISION CHIEF)

OlgaMiranda@dpss.lacounty.gov

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

NORWALK HUB

ANGIE RODRIGUEZ, HSA 1

AngieRodriguez@dpss.lacounty.gov

SANAA HALIM, HSA 1

SanaaHalim@dpss.lacounty.gov

MA ROSUETA RODRIGUEZ, HSA III

RosuetaRodriguez@dpss.lacounty.gov

METRO SPECIAL HUB (LOCATED NEAR DOWNTOWN LOS ANGELES)

GALINA SVESHNIKOVA, HSA II

GalinaSveshnikova@dpss.lacounty.gov

VANIK AVAKIAN, ELIGIBILITY SUPERVISOR

VanikAvakian@dpss.lacounty.gov

PATRICIA DENTON-WRIGHT, HSA III

PatriciaDenton-Wright@dpss.lacounty.gov

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

DIVISION IV

SOUTH SPECIAL HUB (LOCATED IN UNINCORPORATED RANCHO DOMINGUEZ)

JUAN R. LOZANO, HSA III

JuanLozano@dpss.lacounty.gov

DIANA MICHEL, HSA II

DianaMichel@dpss.lacounty.gov

WAHNISHA ROBERTSON, HSA 1

WahnishaRobertson@dpss.lacounty.gov

DANITA ROCHELL MALLET, HSA II

DanitaMallet@dpss.lacounty.gov

NATASHA WILLIAMS, HSA III

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

NatashaWilliams@dpss.lacounty.gov

SOUTHWEST SPECIAL HUB (LOCATED IN UNINCORPORATED WEST ATHENS, NEAR
CITIES OF INGLEWOOD AND GARDENA
JOELA JIMENEZ, HSA 1

JoelaJimenez@dpss.lacounty.gov

NORMA ALICIA JASSO-FERRER, HSA II

NormaJasso@dpss.lacounty.gov

MARIELENA FERNANDEZ, HSA 1

MarielenaFernandez@dpss.lacounty.gov

ANGELA M. BURRELL, HAS II

AngelaBurrell@dpss.lacounty.gov

BARBARA E. WATTS, HSA III (ONE POSITION UNDER DIVISION CHIEF)

BarbaraWatts@dpss.lacounty.gov

JOSE FRANCO, HSA III

JoseFranco@dpss.lacounty.gov

DARNELL KING, HSA I

DarnellKing@dpss.lacounty.gov

ERICA MOYA, HSA I

EricaMoya@dpss.lacounty.gov

PATRICIA AGUILAR, HSA I

PatriciaAguilar@dpss.lacounty.gov

COVINA TUMBLING-THORTON, HSA III

CovinaTumbling-Thornton@dpss.lacounty.gov

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

SOUTH CENTRAL LOS ANGELES HUB

SHANNON DENBY, ASM 1

ShannonDenby@dpss.lacounty.gov

YVETTE CAWTHORNE, ASM 1 (PROMOTED FROM HSA I IN 2023)

YvetteCawthorne@dpss.lacounty.gov

SOUTH FAMILY HUB (LOCATED IN UNINCORPORATED RANCHO DOMINGUEZ)

LINDA M. COOPER, HSA I

LindaCooper@dpss.lacounty.gov

GEORGE K. WEBB, ELIGIBILITY SUPERVISOR

GeorgeWebb@dpss.lacounty.gov

KYM CRENSHAW, HSA III

KymCrenshaw@dpss.lacounty.gov

RANCHO PARK HUB (NEAR CENTURY CITY)

ANITA L. ZAKHARYAN, HSA II

AnitaZakharyan@dpss.lacounty.gov

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

FELIPE RODRIGUEZ, ELIGIBILITY SUPERVISOR

FelipeRodriguez@dpss.lacounty.gov

ROSALVA ARREDONDO, HSA III (ONE POSITION UNDER DIVISION CHIEF)

RosalvaArredondo@dpss.lacounty.gov

PARAMOUNT HUB

EGBERTO DE LEON, HSA I

EgbertoDeLeon@dpss.lacounty.gov

ANGELICIA C. INIGUEZ,

AngelicaCIniguez@dpss.lacounty.gov

SOUTHWEST FAMILY HUB (LOCATED ON VERMONT AVENUE, SOUTH CENTRAL LOS ANGELES AREA)

DEBORAH BARMORE, HSA I

DeborahBarmore@dpss.lacounty.gov

ANGELIA SNOW, HSA I

AngeliaSnow@dpss.lacounty.gov

MARIA J. ACEVES, HSA II

MariaAceves@dpss.lacounty.gov

MARIO ALVAREZ, HSA III,

MarioAlvarez@dpss.lacounty.gov

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

1 ALFREDO GONZALEZ, DIVISION CHIEF

2 AlfredoGonzalez@dpss.lacounty.gov

3
4
5 **DIVISION 5**

6 **GAIN REGION 1, WEST COUNTY OF LOS ANGELES**

7
8
9 CAROLYN WOODARD, HSA III

10 CarolynWoodard@dpss.lacounty.gov

11 AMY BARRAGAN-ALVARADO, DIVISION CHIEF (MIGHT HAVE RETIRED BETWEEN 2021-2023)

12 AmyAlvarado@dpss.lacounty.gov

13
14 ANDRANIK AGHASARYAN, HSA II

15 AndranikAghasaryan@dpss.lacounty.gov

16
17 **GAIN REGION III, SAN GABRIEL VALLEY HUB (LOCATED IN THE CITY OF EL MONTE)**

18
19 CARLOS M. HI, GAIN SERVICES SUPERVISOR

20 CarlosHi@dpss.lacounty.gov

21 ESTELA MURGA, HSA II

22 EstelaMurga@dpss.lacounty.gov

23 ROSALVA SOLORIO, HSA III

24
25

JANUARY 6, PUBLIC COMMENT

26 **ALISON HELEN FAIRCHILD**
27 1308 East Colorado Blvd. |Pasadena, CA. 91106
28 Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

RosalvaSolorio@dpss.lacounty.gov

GAIN REGION III, SUB-OFFICE POMONA

VERONICA JULIANNA DE CICCO, HSA II

VeronicaDeCicco@dpss.lacounty.gov

LANI F. ELJAIK, GAIN SERVICES SUPERVISOR

LaniEljaik@dpss.lacounty.gov

ROSALVA SOLORIO, HSA III (ALSO OVER SAN GABRIEL VALLEY HUB)

RosalvaSolorio@dpss.lacounty.gov

GAIN REGION IV, CENTRAL COUNTY HUB (SOUTH CENTRAL LOS ANGELES)

TUONG VAN T. NGUYEN, DIVISION CHIEF

Tuong-VanNguyen@dpss.lacounty.gov

MARIA MORUA, HSA I

MariaMorua@dpss.lacounty.gov

KEVIN NGUYEN, HSA 1

KevinNguyen@dpss.lacounty.gov

GAIN REGION V. SOUTH COUNTY-HUB (LOCATED NEAR CITY OF CARSON, CALIFORNIA)

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

MARSHA BRYANT-HURT, ASM III

MarshaBryant-Hurt@dpss.lacounty.gov

GERARDO MORA, HSA 1

GerardoMora@dpss.lacounty.gov

JUANA MARQUEZ, HSA 1

JuanaMarquez@dpss.lacounty.gov

GAIN REGION VI, SOUTHEAST COUNTY-BELL HUB (LOCATED IN THE CITY OF BELL, CALIFORNIA)

CYNTHIA T. LOPEZ, ASM III

CynthiaLopez@dpss.lacounty.gov

CARMEN SILVA ALVAREZ, HSA 1

CarmenAlvarez@dpss.lacounty.gov

RICHARD G. WHITE, HSA II

RichardWhite@dpss.lacounty.gov

APPEALS AND STATE HEARING DEPARTMENT

BRIAN E. NOLINER, HSA III

briannollner@dpss.lacounty.gov

GERTRUDE JONES, SECRETARY IV

getrudejones@dpss.lacounty.gov

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

JESUS H. GUEVARA, HSA 1

jesusguevara@dpss.lacounty.gov

SONYA MARTIN, HSA 1

sonyamartin@dpss.lacounty.gov

ROSHANN R. EDWARDS, SECRETARY IV

roshannedwards@dpss.lacounty.gov

DPSS COMMISSION

Wednesday, November 26, 2025
2:10 AM

DPSS COMMISSION MEMBERS

1ST SUPERVISORIAL DISTRICT

ADELE ANDRADE STADLER, CITY OF ALHAMBRA POLITICIAN

astadler@cityofalhambra.org

ANDREW YAM (APPOINTED BY HILDA SOLIS)

ayam@lacounty.gov

ayam@lacounty.gov

PSS_Commission@dpss.lacounty.gov

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

1 **2ND SUPERVISORIAL DISTRICT**

2 **DYNASTY TAYLOR, UNABLE TO LOCATE**

3
4 SUMMER MCBRIDE (CHAIRPERSON)

5 Summer.mcbride@gmail.com

6 BOOKER PEARSON, UNABLE TO LOCATE

7
8 **3RD SUPERVISORIAL DISTRICT**

9
10
11 DOCTOR YVONNE CHAN,

12 yvonne@lacoed.edu

13 ychan@myvaughncharter.com

14 CO-CONSPIRATOR

15
16 FIDEL RAMIREZ, VAUGHN NEXT CENTURY LEARNING CENTER

17 framirez@myvaughncharter.com

18 latigentzz@aol.com

19
20 <https://www.linkedin.com/in/fidel-ramirez-b0745839>

21
22
23
24
25 **JANUARY 6, PUBLIC COMMENT**

26 **ALISON HELEN FAIRCHILD**
27 1308 East Colorado Blvd. |Pasadena, CA. 91106
28 Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

JONI BYUN, DIRECTOR OF KYCC

jbyun@kyccla.org

Byun

From <<https://www.linkedin.com/in/joni-byun-31318/>>

<https://www.linkedin.com/company/kyccla/>

**GENEVIEVE RIUTORT, PRESIDENT & CHIEF EXECUTIVE OFFICER OF THE
WESTSIDE FOOD BANK (LOSER!) LMFAO**

genevieve@wsfb.org

<https://www.linkedin.com/in/genevieveriutort/>

GENEVIEVE CO-CONSPIRATOR

YVONNE LEUNG, CHIEF OPERATING OFFICER

yvonne@wsfb.org

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

SAMUEL JOO, CHIEF EXECUTIVE OFFICER OF ASIAN AMERICAN DRUG
ABUSE PROGRAM

sjoo@aadapinc.org

JOO CO-CONSPIRATOR

LOUIS LEWIS, PROGRAM DIRECTOR

llewis@aadapinc.org

<https://www.linkedin.com/in/sam-joo-32b6055/>

DR. SUE EL HESSEN (VICE CHAIRPERSON)

selhessen@busd.k12.ca.us

yesim.yaramis@hcai.ca.gov

Sue.elhessen@hcai.ca.gov

Sue.elhessen@state.ca.gov

<https://www.linkedin.com/in/dr-sue-elhessen-11aa564/>

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

5TH SUPERVISORIAL DISTRICT

MIHRAN KALAYDJIAN, A HOTELIER WHO HAS ZERO BUSINESS BEING ON A DPSS COMMISSION! WTF!

mihrankalaydjian@gmail.com
mihrankalaydjian@hotmail.com
kmihran@hotmail.com
mkalaydjian@winnetkanc.com

JUAN LEANOS (UNABLE TO LOCATE)

POLLYANNA SIU-YEN-LAM LEE (NO LONGER EMPLOYED AT HERALD CHRISTIAN)

COUNTY OF LOS ANGELES DPSS EXECUTIVES

Tuesday, November 25, 2025
1:12 AM

ALSO COUNTY OF LOS ANGELES BOARD OF SUPERVISORS FOR DISTRICTS 1-5

YOU ALL HAVE 72 HOURS EXCLUDING WEEKENDS AND HOLIDAYS, BUT IN NO EVENT LATER THAN DECEMBER 4, 2025, AT 5 PM PACIFIC STANDARD TIME. TO MAKE SURE FAIRCHILD'S EBT CARD GETS REFUNDED FOR ALL THE ALBERTSONS COMPANIES VONS GROCERY DELIVERY ORDERS ALLEGED AND STATED IN THE ELECTRONIC MAIL MESSAGE YOU WERE ALL ELECTRONICALLY SERVED ON NOVEMBER 29, 2025, AT 1:59 PM.

JANUARY 6, PUBLIC COMMENT

ALISON HELEN FAIRCHILD
1308 East Colorado Blvd. | Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

1 I declare under the penalty of perjury under the laws and Constitutions of
2 California and the United States that every word, sentence, paragraph, page,
3 video recording, audio recording, sound, and image of this CIVIL RIGHTS
4 LEGAL WARNING & PUBLIC COMMENT FOR JANUARY 6, 2026, is true and
5 correct.

6 **DATE: JANUARY 5, 2026, 3:22 PM PACIFIC STANDARD**
7 **TIME**

8
9
10 

11 **ALISON HELEN FAIRCHILD**

12 **1308 East Colorado Blvd.**

13 **Pasadena, CA 91106**

14 **Mobile: (626) 755-6442**

15 **Email: fairchildadacrusader@gmail.com**

16 *Spirit of Esquire*

17
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21
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23
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25

JANUARY 6, PUBLIC COMMENT

26 **ALISON HELEN FAIRCHILD**

27 **1308 East Colorado Blvd. | Pasadena, CA. 91106**

28 **Email: fairchildadacrusader@gmail.com**

Phone: 206.471.1344

1
2
3 **VERIFICATION OF PUBLIC COMMENTER & FUTURE PLAINTIFF**
4 **ALISON HELEN FAIRCHILD**
5

6 United States of America
7 State of California
8 Loma Linda (Unincorporated), California, within the County of San Bernardino
9

10 I, **ALISON HELEN FAIRCHILD**, being duly sworn, say:
11

12 I, ALISON HELEN FAIRCHILD, am a Public Commenter and Future Plaintiff in the
13 meritorious pending action against the County of Los Angeles, its co-conspirators, and its
14 employees.
15

16 I have carefully and thoroughly read and examined the following:
17

- 18 1. **ALISON HELEN FAIRCHILD'S PUBLIC COMMENT FOR JANUARY 6,**
19 **2026**
20

21 and I know the contents thereof. The facts stated therein are true, and within my personal
22 knowledge, except as to those matters which are therein alleged on information and
23 belief, and as to those matters, I believe them also to be true.
24
25

26 **VERIFICATION OF ALISON HELEN FAIRCHILD**

27 **ALISON HELEN FAIRCHILD**
28 1308 East Colorado Blvd. |Pasadena, CA. 91106
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

1 If I were called upon to testify, I could and would testify competently as to the
2 matters stated herein and therein.
3
4
5

6
7 **I declare under penalty of perjury under the laws and constitution of California and**
8 **the United States that every word, sentence, paragraph, and page of this Civil Law**
9 **Verification of ALISON HELEN FAIRCHILD'S PUBLIC COMMENT FOR**
10 **JANUARY 6, 2026, is true and correct.**
11

12 **DATE: January 6, 2026**
13
14

15 
16

17
18 **ALISON HELEN FAIRCHILD**
19 **1308 East Colorado Blvd.**
20 **Pasadena, CA 91106**
21 **Mobile: (626) 755-6442**
22 **Email: fairchildadacrusader@gmail.com**

23 *Spirit of Esquire*
24
25

26 **VERIFICATION OF ALISON HELEN FAIRCHILD**

27 **ALISON HELEN FAIRCHILD**
28 **1308 East Colorado Blvd. | Pasadena, CA. 91106**
Email: fairchildadacrusader@gmail.com
Phone: 206.471.1344

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Neil E. Opdahl-Lopez, Esq. (SBN # 277596)

Major, USMCR

473 E. Carnegie Drive, # 200

San Bernardino, CA 92408

Mobile: 626.429.6578

Facsimile: 888.298.7284

attorney@neilopdahl.com

Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF THE STATE OF CALIFORNIA
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION, GEORGE E. BROWN JR. FEDERAL BUILDING**

ALISON HELEN FAIRCHILD,

Plaintiff,

v.

Hilda Lucia Solis, Deni K. Butler, Robert G.
Luna, Shawn Kehoe, Holly J. Mitchell,
Nicole Amber Davis-Tinkham, Francisco
Garibay, Gerardo Valdivia, InfoTrack US,
Inc., Nationwide Legal LLC, Rapid Legal
Inc., Jose Flores, Tatianna Simoes-Silva,
County of Los Angeles, & DOES 1-10

Defendant(s),

Case No.:

**VERIFIED ORIGINAL CIVIL RIGHTS
COMPLAINT**

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE HED & AGAINST PRIVATE PARTY DEFENDANTS.

1 **VERIFIED ORIGINAL CIVIL RIGHTS COMPLAINT FOR INJUNCTIVE RELIEF,**
2 **DECLARATORY RELIEF, GENERAL DAMAGES, COMPENSATORY DAMAGES,**
3 **SPECIAL DAMAGES & PUNITIVE DAMAGES FOR VIOLATION OF 42 U.S.C. §§**
4 **1983, 1985, & 1986; U.S.C.A. CONST. AMEND. XIV; CALIFORNIA TORTS GENERAL**
5 **NEGLIGENCE, NEGLIGENCE PER SE, GROSS NEGLIGENCE, & NEGLIGENT IED**
6 **AGAINST PRIVATE PARTY DEFENDANTS ONLY; VIOLATION OF [42 U.S.C. §**
7 **12101, 12203] (retaliation, intimidation, threats, and interference of civil rights);**
8 **VIOLATION OF TITLE III OF AMERICANS WITH DISABILITIES ACT OF 1990 [42**
9 **U.S.C. § 12101]; VIOLATION OF TITLE II OF THE AMERICANS WITH**
10 **DISABILITIES ACT OF 1990 [42 U.S.C. § 12132, *et seq*]; VIOLATION OF**
11 **CALIFORNIA CIVIL CODE § 51, *et seq* [THE UNRUH CIVIL RIGHTS ACT] (denial of**
12 **access to full and equal accommodation, advantages, facilities, privileges and services);**
13 **VIOLATION OF CALIFORNIA CIVIL CODE § 51.5, VIOLATION OF CALIFORNIA**
14 **CIVIL CODE § 51.7; VIOLATION OF CALIFORNIA CIVIL CODE § 52.1**

15
16 **Plaintiff ALISON HELEN FAIRCHILD, for her original civil rights complaint,**
17 **through herself, by herself, on behalf of herself, and through federal district court**
18 **representation, upon information and belief, respectfully alleges as follows:**
19

20 **I. INTRODUCTION**

21 1. No man in this country is so high that he is above the law. No officer of the law may
22 set that law at defiance with impunity. All of the officers of the government, from the highest to
23 the lowest, are creatures of the law and are bound to obey it. It is the only supreme power in our
24 system of government, and every man who by accepting office participates in its functions is
25 only the more strongly bound to submit to that supremacy and to observe the limitations which
26 it imposes upon the exercise of the authority which it gives. *United States v. Lee*, 106 U.S. 196,
27 1 S. Ct. 240, 27 L.Ed. 171 (1882) at 220.

28

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE IED & AGAINST PRIVATE PARTY DEFENDANTS.

2. Defendants violated state and federal laws by committing **reckless under color of law negligence, reckless under color of law negligence per se, reckless under color of law gross negligence and reckless under color of law neglect to their duty to assist and investigate** even after they were all timely and previously served a cease-and-desist letter on numerous occasions, sent numerous emails, facsimiles, received personal service at 500 West Temple Street, Room 383, Los Angeles, CA 90012 by nonparty Arogant Hollywood, received notification and, and were all given **FAIR NOTICE** through Plaintiff Alison Helen Fairchild's numerous electronic mail messages and appearances at County of Los Angeles Board of Supervisors public meetings in November 2025 and December 2025. All Defendants sued herein were either served a copy of Plaintiff's numerous cease-and-desist letters or had constructive knowledge of her cease-and-desist letters. Defendants Jose Flores, Tatianna Simoes-Silva, Nationwide Legal, Rapid Legal, and InfoTrack US, Inc.'s One Legal were all given cease-and-desist notice by telephone communication only. All private party Defendants sued herein acted under color of law through their very close nexus relationship with the County of Los Angeles Superior Court and its County of Los Angeles peace officers. Additionally, all private-party Defendants violated numerous statutes under Title III of the Americans with Disabilities Act of 1990.

3. This is an original 42 U.S.C. § 1983 constitutional civil rights complaint that seeks to establish the reckless, wanton, willful, cruel, unconstitutional, malicious, careless, fraudulent, deliberate, and callous actions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 of recklessly violating Plaintiff Alison Helen Fairchild's United States constitutional civil rights. Plaintiff Alison Helen Fairchild's original civil rights complaint seeks to effectuate change through punitive damages by punishing Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell,

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE IIED & AGAINST PRIVATE PARTY DEFENDANTS.

1
2 Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.,
3 Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los
4 Angeles & DOES 1-10 for their egregious conduct with the hope that the punishment is
5 significant enough to prevent Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
6 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
7 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
8 Simoes-Silva, County of Los Angeles & DOES 1-10 from deliberate violations of state and
9 federal laws that were so egregious that it resulted in Plaintiff Alison Helen Fairchild being
10 deliberately wronged by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn
11 Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,
12 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
13 Silva, County of Los Angeles & DOES 1-10 by them separately or jointly engaging in illegal,
14 unlawful, illicit, unconstitutional and egregious misconduct that has resulted in Plaintiff Alison
15 Helen Fairchild being unable to use multiple Stanley Mosk Courthouse outside handicap ramps
16 she needed the assistance of to enter the Stanley Mosk Superior Court on the first floor and
17 second floor level with her fiancé Arogant Hollywood **[hereinafter “KING AROGANT”]**.
18 Plaintiff Fairchild has been unable to walk on the sidewalk outside of the Stanley Mosk
19 Courthouse due to County Defendants allowing Nationwide Legal, InfoTrack US, Inc.’s One
20 Legal, and Rapid Legal employees to park their vehicles on the sidewalk. County Defendants
21 have allowed several of these vehicles to block Fairchild’s path on the sidewalk together at the
22 same time, and vehicles were parked side by side. County Defendants have permitted, consented
23 to, ratified, acquiesced, endorsed, authorized, approved, and tolerated InfoTrack US, Inc.,
24 Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, and Tatianna Simoes-Silva’s employees
25 to willfully, recklessly, maliciously, knowingly, carelessly, deliberately, fraudulently, cruelly,
26 and callously hijack an ADA handicap ramp that Fairchild had a right to use to get exercise
27
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Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE IIED & AGAINST PRIVATE PARTY DEFENDANTS.

1 while she was present at the Stanley Mosk Superior Courthouse, but could not do so due to
2 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, and Tatianna Simoes-
3 Silva's employees leaning on, standing on, putting a chair on, occupying, hijacking, taking over,
4 discouraging disabled Alison Helen Fairchild to enter this particular handicap ramp, physically
5 intimidating Fairchild from entering and using this handicap ramp to safely arrive at the Stanley
6 Mosk Superior Courthouse second floor entrance, and otherwise taking over and otherwise
7 taking over, illegally occupying, trespassing, loitering, soliciting, and controlling Stanley Mosk
8 Superior Court outside handicap ramp while drinking alcohol, smoking marijuana, and smoking
9 crystal methamphetamine, not on a daily basis in front of the Stanley Mosk Superior
10 Courthouse, but on an hourly basis while lazy and incompetent County of Los Angeles and City
11 of Los Angeles peace officers watch these criminals and low-life individuals use drugs and drink
12 alcohol at the exact same time, and while they patrol and park nearby in the comfort of their
13 agency/department-issued marked peace officer vehicle. County Defendants have permitted,
14 consented to, ratified, acquiesced, endorsed, authorized, approved, and tolerated InfoTrack US,
15 Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, and Tatianna Simoes-Silva's
16 employees to willfully, recklessly, maliciously, knowingly, carelessly, deliberately, fraudulently,
17 cruelly, and callously hijack a Stanley Mosk Courthouse ADA handicap ramp that Fairchild
18 needed to use in order to be able to safely enter the second floor entrance of the Stanley Mosk
19 Superior Courthouse but could not do so due to InfoTrack US, Inc., Nationwide Legal LLC,
20 Rapid Legal Inc., Jose Flores, and Tatianna Simoes-Silva's employees leaning on, standing on,
21 putting a chair on, occupying, hijacking, taking over, discouraging disabled Alison Helen
22 Fairchild to enter this particular handicap ramp, physically intimidating Fairchild from entering
23 and using this handicap ramp to safely arrive at the Stanley Mosk Superior Courthouse second
24 floor entrance and otherwise taking over, illegally occupying, trespassing, loitering, soliciting,
25 and controlling Stanley Mosk Superior Court outside handicap ramp while drinking alcohol,
26 smoking marijuana, and smoking crystal methamphetamine, not on a daily basis in front of the
27 Stanley Mosk Superior
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Courthouse, but on an hourly basis, while lazy and incompetent County of Los Angeles and City of Los Angeles peace officers watch these criminals and low-life individuals use drugs and drink alcohol at the exact same time, and while they patrol and park nearby in the comfort of their agency/department-issued marked peace officer vehicle. The reckless under color of law negligence, reckless under color of law negligence per se, reckless under color of law gross negligence, general negligence, negligence per se, and gross negligence and all other illegal acts done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 resulted in Plaintiff Alison Helen Fairchild being deprived of her Due Process Clause constitutional rights in direct violation of the Fourteenth Amendment of the United States Constitution. The reckless under color of law negligence, reckless under color of law negligence per se, reckless under color of law gross negligence, general negligence, negligence per se, and gross negligence and all other illegal acts done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 resulted in Plaintiff Alison Helen Fairchild being deprived of her constitutional civil rights protected under Title II and Title III of Americans with Disabilities Act of 1990.

4. All other named and unnamed Defendants acted under the color of law by working very closely with the County of Los Angeles local government, County of Los Angeles Board of Supervisors, County of Los Angeles peace officers, County of Los Angeles Superior Court employees, and DOES 1-10 to recklessly violate the United States constitutional civil rights of Plaintiff Alison Helen Fairchild.

5. This action arises from a violation, inter alia, of Title II of the Americans with Disabilities Act of 1990 codified at 42 U.S.C. § 12132, *et seq.*, Title III of the Americans with Disabilities Act of 1990 codified at 42 U.S.C. 12101 *et seq.*, 42 U.S.C. § 1983, 42 U.S.C. § 1985, 42 U.S.C. § 1986, and 42 U.S.C. § 12203. Plaintiff Alison Helen Fairchild seeks to redress violations of her California state civil rights and her federal civil rights via the supplemental jurisdiction of this United States District Court.

II. STATUTE OF LIMITATIONS

6. Plaintiff Alison Helen Fairchild brought this original civil rights complaint before this United States Court for the Central District of California before the expiration of Alison Helen Fairchild's statute of limitations, which will expire on or about August 21, 2027. Plaintiff Alison Helen Fairchild will allege throughout this original civil rights complaint numerous factual allegations that occurred between 2015 and 2025.

III. PRELIMINARY STATEMENT

7. This is an original constitutional civil rights action in which Plaintiff **ALISON HELEN FAIRCHILD** [hereinafter "**Fairchild**" or **Plaintiff**] seeks damages to redress the under color of law deprivation of constitutional civil rights secured to Plaintiff under the Fourteenth Amendment of the United States Constitution, under 42 U.S.C. § 1983, under 42 U.S.C. § 1985, under 42 U.S.C. § 1986, under Title II of the Americans with Disabilities Act of 1990, under 42 U.S.C. § 12132, *et seq.*, Title III of the Americans with Disabilities Act of 1990, under 42 U.S.C. 12101 *et seq.*, and under 42 U.S.C. § 12203.

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1 **IV. TIMELY SERVED CEASE-AND-DESIST-LETTER**

2
3 8. Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J.
4 Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, County of Los Angeles & DOES 1-
5 10 all received FAIR NOTICE by way of a timely served Cease-and-Desist letter that was
6 served upon them through numerous electronic mail messages, submission of lengthy online
7 public comments, submission of lengthy physical paper form public comments, and personal
8 service of Fairchild's physical paper written public comments by KING AROGANT to
9 Defendants' County of Los Angeles Executive Office located at 500 West Temple Street, Room
10 383, Los Angeles, CA 90012 at least during four separate County of Los Angeles Board of
11 Supervisors public board meetings prior to this civil rights complaint being commenced. See
12 now **Appendix of Exhibits, Exhibit 2**. Defendants InfoTrack US, Inc., Nationwide Legal LLC,
13 Rapid Legal Inc., Jose Flores, and Tatianna Simoes-Silva were all given legal notice of their
14 liability by telephonic communication only. Defendant Gerardo Valdivia received fair notice in
15 person on November 17, 2025, and December 17, 2025, to have individuals cease and desist
16 illegally blocking Fairchild's path on numerous outside Stanly Mosk Superior Court handicap
17 ramps and sidewalks. Even after being served with Plaintiff's numerous Cease-and-Desist
18 letters, Defendants all continued to willfully, recklessly, wantonly, cruelly, fraudulently,
19 maliciously, knowingly, carelessly, deliberately, and callously violate the United States
20 Constitution, the California Constitution, Alison Helen Fairchild's Fourteenth Amendment Due
21 Process Clause constitutional civil rights and her civil rights protected pursuant to Titles II & III
22 of the Americans with Disabilities Act of 1990 while both local government Defendants and
23 private party Defendants alike were primarily acting under the color of law. The Plaintiff's
24 numerous Cease-and-Desist letters were served upon Defendants Hilda Lucia Solis, Deni K.
25 Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham,
26 Francisco Garibay, County of Los Angeles & DOES 1-10 through
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28

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1 electronic mail messages and personal service by KING AROGANT. Plaintiff Alison Helen
2 Fairchild's numerous served written Cease-and-Desist letters all commanded Defendants Hilda
3 Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber
4 Davis-Tinkham, Francisco Garibay, County of Los Angeles & DOES 1-10 to cease and desist
5 recklessly violating Alison Helen Fairchild's United States constitutional civil rights and those
6 same cease and desist letters commanded Defendants Hilda Lucia Solis, Deni K. Butler, Robert
7 G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay,
8 County of Los Angeles & DOES 1-10 to immediately remove individuals that were recklessly
9 violating Stanley Mosk Courthouse outside ADA handicap ramp that prevented Fairchild from
10 safely entering the Stanley Mosk Courthouse second floor entrance. The only County Defendant
11 that did not receive Fairchild's electronic mail messages and written public comments was
12 Defendant Valdivia. Defendant Valdivia received a verbal cease-and-desist notice in person at
13 the Stanley Mosk Superior Court on November 17, 2025, and again on December 17, 2025. See
14 the declaration of ALISON HELEN FAIRCHILD in support of the timely cease-and-desist letter
15 and telephonic notice served upon Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn
16 Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, County of Los
17 Angeles & DOES 1-10 during various times and on different dates.

20 **V. DEFENDANTS RECEIVED FAIR NOTICE**

21
22 9. Pursuant to the numerous served Cease-and-Desist Letters, all named Defendants and
23 DOES 1-10 received **FAIR NOTICE** by electronic mail, telephonic communication, in-person
24 communication, or through in-person service of documents that they were willfully, recklessly,
25 knowingly, maliciously, carelessly, cruelly, wantonly, deliberately, fraudulently, and callously
26 violating Plaintiff Alison Helen Fairchild's constitutional civil rights.

VI. JURISDICTION & VENUE

10. This original civil rights action is brought pursuant to 42 U.S.C. §§ 1983, 1985, 1986, 12101, 12132, & 12203 to redress the under color of law deprivation of Plaintiff Alison Helen Fairchild's constitutional civil rights as secured by the United States Constitution, Title II of the Americans with Disabilities Act of 1990, & Title III of the Americans with Disabilities Act of 1990. This United States District Court for the Central District of California has intradistrict assignment privileges over all Defendants. Plaintiff Alison Helen Fairchild's federal claims and allegations are based on violations committed by Defendants who reside and are gainfully employed in the County of Los Angeles and separately County of San Bernardino (Defendants Rapid Legal Inc. and Tatianna Simoes-Silva reside and work in the County of San Bernardino). Nearly all of those Defendants transacted business with the County of Los Angeles and were paid handsomely by the County of Los Angeles regarding and relating to these claims and allegations made against all Defendants. All Defendants were employed by the County of Los Angeles or by California corporations, including Nationwide Legal LLC, Rapid Legal Inc., and InfoTrack US. Inc.'s California-based One Legal, while they were transacting business and gainfully employed from and in the County of Los Angeles and the County of San Bernardino. All herein named private citizen and private corporation Defendants conspired with County of Los Angeles employed Defendants residing and working in County of Los Angeles to willfully, knowingly, recklessly, maliciously, wantonly, deliberately, cruelly, fraudulently, carelessly, and callously deprive Plaintiff Alison Helen Fairchild of her United States Fourteenth Amendment Due Process Clause constitutional and her constitutional civil rights protected under Titles II & III of the Americans with Disabilities Act of 1990 while they were all recklessly bathed, clothed, draped, and covered in, of and under the color of law.

11. This United States District Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1343.

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12. This United States District Court has supplemental jurisdiction under 28 U.S.C. § 1367(a).

13. Declaratory and injunctive relief are authorized by 28 U.S.C. §§ 2201, 2202, and 1343.

14. Venue is proper under 28 U.S.C. § 1391(b)(1) because Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.'s One Legal, Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 all reside in this United States Central District of California judicial district.

15. Personal jurisdiction is proper against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.'s One Legal, Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 because they are either domiciled in California, or have regularly transacted business in the state of California, or are gainfully employed in the state of California.

16. This United States District Court has original jurisdiction pursuant to 28 U.S.C. § 1332(a)(1) because Plaintiff Alison Helen Fairchild is a citizen of the state of California and Delaware incorporated InfoTrack US, Inc. is a citizen of the state of New York, and the damages demanded against Defendant InfoTrack US, Inc. exceeds the monetary amount of \$ 75,000.

17. This is an original constitutional civil rights action for general damages, compensatory damages, punitive damages, special damages, injunctive relief, and declaratory relief under 42

U.S.C. § 1983 based upon under color of law willful, knowing, reckless, wanton, malicious, careless, deliberate, cruel, carelessness, fraudulent and callous violations of the Due Process Clause of the Fourteenth Amendment of the United States Constitution, Title II of the Americans with Disabilities Act of 1990, and Title III of the Americans with Disabilities Act of 1990 by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.'s One Legal, Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10

18. This is an original constitutional civil rights action for general damages, compensatory damages, punitive damages, special damages, injunctive relief, and declaratory relief under 42 U.S.C. §§ 1983, 1985, 1986, 12101, 12132 & 12203 based upon Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.'s One Legal, Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10's under color of law willful, knowing, reckless, wanton, malicious, careless, deliberate, cruel, fraudulent, and callous violations of the Due Process Clause of the Fourteenth Amendment of the United States Constitution, Title II of the Americans Disabilities Act of 1990 and Title III of the Americans with Disabilities Act of 1990.

VII. JURY TRIAL DEMAND AND CIVIL RIGHTS COMPLAINT OF ALISON HELEN FAIRCHILD

19. **PLAINTIFF ALISON HELEN FAIRCHILD**, individually, brings this original constitutional civil rights action against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.'s One Legal, Nationwide Legal LLC, Rapid Legal Inc.,

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Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10.

VIII. PLAINTIFF ALISON HELEN FAIRCHILD HEREBY ALLEGES AS SET FORTH

IX. SUBJECT MATTER JURISDICTION & ARTICLE III STANDING TO BRING FORTH THIS LAWSUIT

20. To establish standings to maintain an action in federal district court, a plaintiff must allege: (1) injury in fact, (2) causation----“a fairly traceable connection between the plaintiff’s harm and the complained of conduct of the defendant”, and------(3) redressability ----- “a likelihood that the requested relief will redress the alleged injury.” See *Steel Co. v. Citizens for a Better Environment*, 523 U.S. 83, 118 S.Ct. 1003, 140 L.Ed.2d 210 (1998); *Lujan v. Defenders of Wildlife*, 504 U.S. 555, 112 S.Ct. 2130, 119 L.Ed.2d 351 (1992)

21. The Supreme Court has explained that “the irreducible constitutional minimum’ of standing consists of three elements.” See *Spokeo Inc. v. Robins*, 578 U.S. 330, 136 S.Ct. 1540, 194 L.Ed.2d 635 (2016) (*quoting Lujan*, 504 U.S. at 560). A plaintiff “must have (1) suffered an injury in fact, (2) that is fairly traceable to the challenged conduct of a defendant, and (3) that is likely to be redressed by a favorable judicial decision.

22. Plaintiff Alison Helen Fairchild has alleged that Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.’s One Legal, Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10

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1 willfully, knowingly, recklessly, cruelly, fraudulently, wantonly, carelessly, maliciously,
2 deliberately, and callously violated her constitutional civil rights under color of law. Plaintiff
3 Alison Helen Fairchild has alleged that all Defendants' willful, knowing, reckless, wanton,
4 careless, cruel, fraudulent, malicious, deliberate and callous illegal actions of violating
5 Plaintiff's constitutional civil rights under color law resulted in Plaintiff Alison Helen Fairchild
6 suffering from including but not limited to damages for without limitation, embarrassment,
7 humiliation, anxiety, depression, a complete disruption of life, post-traumatic stress disorder,
8 physical pain and suffering and emotional pain and suffering, insomnia, chest pain,
9 inconvenience, heart palpitations, migraines, stomach aches, frustration, mental anguish,
10 emotional distress, loss of enjoyment of life, loss of constitutional civil rights, deprivation of
11 constitutional rights, and other pain and suffering. Plaintiff Alison Helen Fairchild has filed this
12 original constitutional civil rights complaint on her behalf to redress constitutional civil rights
13 violations by all Defendants.

14
15 23. Plaintiff Alison Helen Fairchild alleges that Defendants, some of Defendants' employees,
16 and some of Defendants' management willfully, knowingly, cruelly, fraudulently, recklessly,
17 wantonly, maliciously, carelessly, deliberately, and callously violated Plaintiff Fairchild's
18 United States Fourteenth Amendment Due Process Clause constitutional civil rights and her
19 rights protected under Title II of the Americans with Disabilities Act of 1990 and Title
20 III of the Americans with Disabilities Act of 1990. Plaintiff Fairchild asserts that Defendants'
21 willful, reckless, knowing, malicious, wanton, cruel, fraudulent, deliberate, and callous
22 violations of 42 U.S.C. §§ 1983, 1985, 1986, 12101, 12132, & 12203 resulted in Defendants'
23 reckless disrespect and complete disregard for Plaintiff Alison Helen Fairchild's constitutional
24 civil rights, her emotional health, her mental health, her physical well-being and personal
25 welfare. Defendants' illegal acts, illegal actions, and unconstitutional misconduct were an
26 irresponsible and deliberate violation of the United States Constitution, Title II of the Americans

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with Disabilities Act of 1990, Title III of the Americans with Disabilities Act of 1990, and all Defendants' misconduct, illegal actions, illegal acts, and transgressions were a violation of federal law.

24. Plaintiff Alison Helen Fairchild alleges that private citizens and employees of private corporations InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, and DOES 1-10 have all conspired to interfere with Plaintiff Fairchild's United States Fourteenth Amendment Due Process Clause and her constitutional civil rights that were protected under Titles II & III of the Americans with Disabilities Act of 1990 by conspiring with County of Los Angeles employees, officials, and peace officers to harm and cause injury to Plaintiff, recklessly.

25. Plaintiff Alison Helen Fairchild hereby alleges that Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.'s One Legal, Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 recklessly violated Fairchild's United States Fourteenth Amendment Due Process Clause constitutional civil rights and her civil rights protected under Titles II & III of the Americans with Disabilities Act of 1990 by them willfully, cruelly, carelessly, knowingly, wantonly, cruelly, recklessly, maliciously, deliberately, fraudulently, and callously committing reckless under color of law negligence, reckless under color of law negligence per se, and reckless under color of law gross negligence. Plaintiff Alison Helen Fairchild has alleged numerous other federal and California state law violations, including, but not limited to, Defendants' violations of 42 U.S.C. §§ 1983, 1985, 1986, 12101, 12132, 12203, & The Unruh Civil Rights Act, codified at California Civil Code § 51, *et seq.*

X. PARTIES

26. Plaintiff **ALISON HELEN FAIRCHILD** (hereinafter “**Fairchild**” or “**Plaintiff**”) is a resident of California and San Bernardino County. At the time of the filing of this original constitutional civil rights complaint and at all relevant times stated throughout this original federal civil rights complaint Plaintiff Fairchild was a California resident frequenting the Superior Court of California, County of Los Angeles, Stanley Mosk Superior Court to do research on Stanley Mosk Superior Court public terminals, to escort KING AROGANT to his court hearings and offer emotional support, to file and make copies on behalf of her fiancé KING AROGANT, and to get exercise outside of Stanley Mosk Courthouse for health reasons while she was present at the Stanley Mosk Courthouse. At all relevant times stated throughout this original federal civil rights complaint, Plaintiff Fairchild was a California resident who required the assistance of a Stanley Mosk Superior Court outside handicap ramp to safely arrive at the Stanley Mosk Superior Court second-floor entrance. Based upon the reckless under color of law negligence, reckless under color of law negligence per se, and reckless gross negligence done to her by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.’s One Legal, Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10’s willful, knowing, wanton, reckless, cruel, fraudulent, malicious, careless, deliberate, and callous violations of the United States Constitution, the California Constitution, Plaintiff Fairchild’s United States Fourteenth Amendment Due Process constitutional civil rights and her civil rights protected under Titles II & III of the Americans with Disabilities Act of 1990. Plaintiff Fairchild was injured by all Defendants and recklessly deprived of her civil rights by all Defendants.

27. At all times relevant hereto and stated throughout this original constitutional civil rights complaint, Plaintiff **ALISON HELEN FAIRCHILD** was an individual over 18 years old, a

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1 resident of the state of California, and a citizen of the United States of America.

2
3 28. Plaintiff **ALISON HELEN FAIRCHILD** is a disabled United States citizen who was
4 prevented from using numerous sidewalks and the Stanley Mosk Courthouse outside handicap
5 ramps due to Defendants' willful, knowing, reckless, cruel, careless, wanton, malicious,
6 deliberate and callous under color of negligence, under color of law negligence per se, and under
7 color of law gross negligence that resulted in **ALISON HELEN FAIRCHILD** being physically
8 prevented from using a handicap ramp that individuals and employees of Defendants' InfoTrack
9 US, Inc.'s One Legal, Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
10 Silva and DOES 1-10 were recklessly leaning on, standing on, putting a chair on, occupying,
11 hijacking, taking over, discouraging disabled Alison Helen Fairchild to enter this particular
12 handicap ramp, physically intimidating Fairchild from entering and using this handicap ramp to
13 safely arrive at the Stanley Mosk Superior Courthouse second floor entrance and otherwise
14 taking over, illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley
15 Mosk Superior Court outside handicap ramp while drinking alcohol, smoking marijuana, and
16 smoking crystal methamphetamine. Private actors and private business entities InfoTrack US,
17 Inc., One Legal, Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva,
18 and DOES 1-10 engaged in quasi-government activities by recklessly using Superior Court of
19 California peace officers and employees to continue to recklessly lean on, stand on, put a chair
20 on, occupy, hijack, take over, discourage disabled Alison Helen Fairchild to enter this particular
21 handicap ramp, physically intimidate Fairchild from entering and using this handicap ramp to
22 safely arrive at the Stanley Mosk Superior Courthouse second floor entrance and otherwise
23 taking over, illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley
24 Mosk Superior Court outside handicap ramp while drinking alcohol, smoking marijuana, and
25 smoking crystal methamphetamine.
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Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE HED & AGAINST PRIVATE PARTY DEFENDANTS.

29. Plaintiff **ALISON HELEN FAIRCHILD** has an interest in this original constitutional civil rights action through the redress of her civil constitutional rights protected under the Fourteenth Amendment, Title II of the Americans with Disabilities Act of 1990. Fairchild has an interest in this original constitutional civil rights action based upon the reckless, illegal acts and actions done to Plaintiff Fairchild by Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.'s One Legal, Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 that was in direct violation of 42 U.S.C. § 1983, 42 U.S.C. § 1985, 42 U.S.C. § 1986, 42 U.S.C. § 12101, 42 U.S.C. § 12132, 42 U.S.C. § 12203, and U.S.C.A. CONST. AMEND XIV.

30. Plaintiff **ALISON HELEN FAIRCHILD** is a proper and appropriate party to this original constitutional civil rights action through her redress of her civil rights protected by the Fourteenth Amendment and Titles II & III of the Americans with Disabilities Act of 1990, and through all Defendants' willful, reckless, wanton, cruel, malicious, knowing, careless, callous, and deliberate actions alleged herein and throughout this original constitutional civil rights complaint that interfered, invaded, infringed upon, and deprived **Plaintiff ALISON HELEN FAIRCHILD** of her United States constitutional civil rights pursuant to 42 U.S.C. § 1983, 42 U.S.C. § 1985, 42 U.S.C. § 1986, 42 U.S.C. § 12101, 42 U.S.C. § 12132, 42 U.S.C. § 12203, and the Due Process Clause of the Fourteenth Amendment of the United States Constitution, and the analogous provisions of California constitutional and statutory law. Plaintiff **ALISON HELEN FAIRCHILD** seeks compensatory damages, general damages, special damages, and punitive damages, for the individual Plaintiff **ALISON HELEN FAIRCHILD** on her behalf and for herself only.

31. Defendant **HILDA LUCIA SOLIS (hereinafter "Solis")** is an elected County of Los Angeles supervisor who has jurisdiction and authority over all County of Los Angeles public

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1 agencies, including but not limited to the County of Los Angeles Sheriff's Department and all
2 thirty-six Superior Court of California, County of Los Angeles courthouses. Solis is gainfully
3 employed by the County of Los Angeles with a total annual salary of approximately \$390,346
4 before taxes. Defendant Solis engaged in the reckless and wanton misconduct complained of
5 herein while working in the course and scope of her employment with the County of Los
6 Angeles. Defendant Solis is currently being sued in her official capacity as an employee of the
7 County of Los Angeles and in her personal capacity as a citizen of the United States. Defendant
8 Solis acted under the color of law by her illegal and unlawful actions, decisions, and misconduct
9 of willfully, recklessly, maliciously, knowingly, carelessly, cruelly, and deliberately with callous
10 indifference to Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights
11 failed to stop and failed to intervene with an illegal and unlawful operation that has prevented
12 Fairchild from safely using a Stanley Mosk outside handicap ramp and sidewalk since at least
13 August 2025. Defendant Solis intentionally and recklessly violated Fairchild's United States
14 Fourteenth Amendment Due Process Clause constitutional civil rights, her California
15 Constitution Article I, § 7 constitutional civil rights, and her civil rights protected pursuant to
16 Title II of the Americans with Disabilities Act of 1990. Defendant Hilda Lucia Solis resides in
17 the County of Los Angeles. Defendant Solis is not entitled to any type, shape, or form of
18 immunity.

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20 32. Defendant **DENI K. BUTLER (hereinafter "Butler")** is a County of Los Angeles
21 employee who manages the day-to-day operations of all thirty-six Superior Court of California,
22 County of Los Angeles courthouses as the Chief Operating Officer. Butler is gainfully employed
23 by the County of Los Angeles with a total annual salary of approximately \$364,432 before
24 taxes. Defendant Butler engaged in the reckless and wanton misconduct complained of herein
25 while working in the course and scope of her employment with the County of Los Angeles.
26 Defendant Butler is currently being sued in her official capacity as an employee of the County of
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Los Angeles and in her personal capacity as a citizen of the United States. Defendant Butler acted under the color of law by her illegal and unlawful actions, decisions, and misconduct of willfully, recklessly, maliciously, cruelly, knowingly, carelessly, and deliberately with callous indifference to Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights failed to stop and failed to intervene with an illegal and unlawful operation that has prevented Fairchild from safely using a Stanley Mosk outside handicap ramp and sidewalk since at least August 2025. Defendant Butler intentionally and recklessly violated Fairchild's United States Fourteenth Amendment Due Process Clause constitutional civil rights, her California Constitution Article I, § 7 constitutional civil rights, and her civil rights protected pursuant to Title II of the Americans with Disabilities Act of 1990. Defendant Deni K. Butler resides in the County of Los Angeles. Defendant Butler is not entitled to any type, shape, or form of immunity.

33. Defendant **ROBERT G. LUNA (hereinafter "Luna")** is an elected County of Los Angeles peace officer who has jurisdiction and authority over all County of Los Angeles Sheriff's Department bureaus and divisions. Luna is gainfully employed by the County of Los Angeles, earning a total annual salary of approximately \$430,000 before taxes. Defendant Luna engaged in the reckless and wanton misconduct complained of herein while working in the course and scope of his employment with the County of Los Angeles. Defendant Luna is currently being sued in his official capacity as an employee of the County of Los Angeles and in his personal capacity as a citizen of the United States. Defendant Luna acted under the color of law by his illegal and unlawful actions, decisions, and misconduct of willfully, recklessly, maliciously, knowingly, carelessly, cruelly, and deliberately with callous indifference to Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights failed to stop and failed to intervene in an illegal and unlawful operation that has prevented Fairchild from safely using a Stanley Mosk outside handicap ramp and sidewalk since at least August 2025.

1 Defendant Luna intentionally and recklessly violated Fairchild's United States Fourteenth
2 Amendment Due Process Clause constitutional civil rights, her California Constitution Article I,
3 § 7 constitutional civil rights, and her civil rights protected pursuant to Title II of the Americans
4 with Disabilities Act of 1990. Defendant Robert G. Luna resides in the County of Los Angeles.
5 Defendant Luna is not entitled to any type, shape, or form of immunity.

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7 34. Defendant **SHAWN R. KEHOE (hereinafter "Kehoe")** is a County of Los Angeles
8 peace officer commander who has authority over all County of Los Angeles Sheriff's
9 Department Court Services employees and peace officers working from thirty-six Superior
10 Court of California, County of Los Angeles courthouses. Kehoe is gainfully employed by the
11 County of Los Angeles, with a total annual salary of approximately \$275,000 before taxes.
12 Defendant Kehoe engaged in the reckless and wanton misconduct complained of herein while
13 working in the course and scope of his employment with the County of Los Angeles. Defendant
14 Kehoe is currently being sued in his official capacity as an employee of the County of Los
15 Angeles and in his personal capacity as a citizen of the United States. Defendant Kehoe acted
16 under the color of law by his illegal and unlawful actions, decisions, and misconduct of
17 willfully, recklessly, maliciously, knowingly, carelessly, and deliberately with callous
18 indifference to Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights
19 failed to stop and failed to intervene in an illegal and unlawful operation that has prevented
20 Fairchild from safely using a Stanley Mosk outside handicap ramp and sidewalk since at least
21 August 2025. . Defendant Kehoe intentionally and recklessly violated Fairchild's United States
22 Fourteenth Amendment Due Process Clause constitutional civil rights, her California
23 Constitution Article I, § 7 constitutional civil rights, and her civil rights protected pursuant to
24 Title II of the Americans with Disabilities Act of 1990. Defendant Kehoe resides in the County
25 of Los Angeles. Defendant Kehoe is not entitled to any type, shape, or form of immunity.
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35. Defendant **HOLLY J. MITCHELL** (hereinafter “**Mitchell**”) is an elected County of Los Angeles supervisor who has jurisdiction and authority over all County of Los Angeles public agencies, including but not limited to the County of Los Angeles Sheriff’s Department and all thirty-six Superior Court of California, County of Los Angeles courthouses. Mitchell is gainfully employed by the County of Los Angeles with a total annual salary of approximately \$372,850 before taxes. Defendant Mitchell engaged in the reckless and wanton misconduct complained of herein while working in the course and scope of her employment with the County of Los Angeles. Defendant Mitchell is currently being sued in her official capacity as an employee of the County of Los Angeles and in her personal capacity as a citizen of the United States. Defendant Mitchell acted under the color of law by her illegal and unlawful actions, decisions, and misconduct of willfully, recklessly, maliciously, knowingly, carelessly, cruelly, and deliberately with callous indifference to Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights failed to stop and failed to intervene with an illegal and unlawful operation that has prevented Fairchild from safely using a Stanley Mosk outside handicap ramp and sidewalk since at least August 2025. Defendant Mitchell intentionally and recklessly violated Fairchild’s United States Fourteenth Amendment Due Process Clause constitutional civil rights, her California Constitution Article I, § 7 constitutional civil rights, and her civil rights protected pursuant to Title II of the Americans with Disabilities Act of 1990. Defendant Holly J. Mitchell resides in the County of Los Angeles. Defendant Mitchell is not entitled to any type, shape, or form of immunity.

36. Defendant **NICOLE DAVIS TINKHAM** (hereinafter “**Tinkham**”) is a County of Los Angeles employee who works as an Assistant County Counsel for the County of Los Angeles Office of the County Counsel. Tinkham is gainfully employed by the County of Los Angeles, with a total annual salary of approximately \$ 322,124 before taxes. Defendant Tinkham engaged in the reckless and wanton misconduct complained of herein while working in the course and

scope of her employment with the County of Los Angeles. Defendant Butler is currently being sued in her official capacity as an employee of the County of Los Angeles and in her personal capacity as a citizen of the United States. Defendant Tinkham acted under the color of law through her illegal and unlawful actions, decisions, and misconduct of willfully, recklessly, maliciously, cruelly, knowingly, carelessly, and deliberately with callous indifference to Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights failed to stop and failed to intervene with an illegal and unlawful operation that has prevented Fairchild from safely using a Stanley Mosk outside handicap ramp and sidewalk since at least August 2025. Defendant Tinkham intentionally and recklessly violated Fairchild's United States Fourteenth Amendment Due Process Clause constitutional civil rights, her California Constitution Article I, § 7 constitutional civil rights, and her civil rights protected pursuant to Title II of the Americans with Disabilities Act of 1990. Defendant Tinkham resides in the County of Los Angeles. Defendant Tinkham is not entitled to any type, shape, or form of immunity.

37. Defendant **FRANCISCO GARIBAY (hereinafter "Garibay")** is a County of Los Angeles employee who works as head board specialist for the County of Los Angeles Board of Supervisors' Executive Office located at 500 West Temple Street, Room 383, Los Angeles, CA 90012. Garibay is gainfully employed by the County of Los Angeles, with a total annual salary of approximately \$ 114,648 before taxes. Defendant Garibay engaged in the reckless and wanton misconduct complained of herein while working in the course and scope of his employment with the County of Los Angeles. Defendant Garibay is currently being sued in his official capacity as an employee of the County of Los Angeles and in his personal capacity as a citizen of the United States. Defendant Garibay acted under the color of law through his illegal and unlawful actions, decisions, and misconduct of willfully, recklessly, maliciously, cruelly, knowingly, carelessly, and deliberately with callous indifference to Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights failed to stop and failed to intervene with an illegal and unlawful operation that has prevented Fairchild from safely using a Stanley

1 Mosk outside handicap ramp and sidewalk since at least August 2025. Defendant Garibay
2 intentionally and recklessly violated Fairchild's United States Fourteenth Amendment Due
3 Process Clause constitutional civil rights, her California Constitution Article I, § 7 constitutional
4 civil rights, and her civil rights protected pursuant to Title II of the Americans with Disabilities
5 Act of 1990. Defendant Garibay resides in the County of Los Angeles. Defendant Garibay is not
6 entitled to any type, shape, or form of immunity.

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8 38. Defendant **GERARDO VALDIVIA (hereinafter "VALDIVIA")** is a County of Los
9 Angeles peace officer who has authority over all County of Los Angeles Sheriff's Department
10 Stanley Mosk Courthouse watch commander that, on most days, oversee all Stanley Mosk
11 court services and supervise all sheriff deputies under the rank of sergeant. Valdivia is gainfully
12 employed by the County of Los Angeles, with a total annual salary of approximately \$175,000
13 before taxes. Defendant Valdivia engaged in the reckless and wanton misconduct complained of
14 herein while working in the course and scope of his employment with the County of Los
15 Angeles. Defendant Valdivia is currently being sued in his official capacity as an employee of
16 the County of Los Angeles and in his personal capacity as a citizen of the United States.
17 Defendant Valdivia acted under the color of law by his illegal and unlawful actions, decisions,
18 and misconduct of willfully, recklessly, maliciously, knowingly, carelessly, cruel, and
19 deliberately with callous indifference to Plaintiff Alison Helen Fairchild's federally protected
20 constitutional civil rights failed to stop and failed to intervene in an illegal and unlawful
21 operation that has prevented Fairchild from safely using a Stanley Mosk outside handicap ramp
22 and sidewalk since at least August 2025. Defendant Valdivia intentionally and recklessly
23 violated Fairchild's United States Fourteenth Amendment Due Process Clause constitutional
24 civil rights, her California Constitution Article I, § 7 constitutional civil rights, and her civil
25 rights protected pursuant to Title II of the Americans with Disabilities Act of 1990. Defendant
26 Valdivia resides in the County of Los Angeles. Defendant Valdivia is not entitled to any type,
27 shape, or form of immunity.

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39. Defendant **INFOTRACK US, INC. (hereinafter “INFOTRACK”)** (New York Department of State Division of Corporations Entity Number 6040007) and Delaware Department of State, Division of Corporations Entity Number 4444211 is a Delaware foreign corporation with its principal place of business at both 135 King Street, Sydney, Australia, NSW 2000 and 3 2nd Street, Suite 803, Jersey City, NJ 07310. Defendant InfoTrack US, INC. is a foreign corporation formed under the laws of the state of Delaware and the country of Australia. In the state of California Infotrack US, INC. is registered under foreign corporation **entity number 4688867**. Infotrack does business in the state of California as One Legal and Green Filing, both of which it acquired in 2020 and 2021, respectively. Defendant InfoTrack acted under the color of law by its illegal and unlawful actions, decisions, and misconduct of willfully, recklessly, maliciously, knowingly, cruelly, carelessly, callously, and deliberately with callous indifference to Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights failed to stop and failed to intervene in an illegal and unlawful operation that has prevented Fairchild from safely using a Stanley Mosk outside handicap ramp and sidewalk since at least August 2025. Defendant InfoTrack intentionally and recklessly violated Fairchild’s United States Fourteenth Amendment Due Process Clause constitutional civil rights, her California Constitution Article I, § 7 constitutional civil rights, and her civil rights protected pursuant to Title III of the Americans with Disabilities Act of 1990. On information and InfoTrack directed and authorized all of One Legal’s operational decisions relevant herein from its United States worldwide headquarters located at 135 King Street, Sydney, Australia, NSW 2000, and 3 2nd Street, Suite 803, Jersey City, NJ 07310.

40. Defendant **NATIONWIDE LEGAL, LLC (hereinafter “NATIONWIDE LEGAL”)** (California Secretary of State Entity Number 201023510069) and Delaware Department of State, Division of Corporations, Entity Number 4862555) is a Delaware foreign limited

liability corporation with its principal place of business located at 1609 James M. Wood Blvd., 2nd Floor, Los Angeles, CA 90015. Defendant Nationwide Legal is a foreign corporation formed under the laws of the state of Delaware. In the state of California, Nationwide Legal is registered as a foreign corporation under **entity number 201023510069**. Nationwide Legal LLC does business in the state of California as Nationwide Legal. Defendant Nationwide acted under the color of law by its illegal and unlawful actions, decisions, and misconduct of willfully, recklessly, maliciously, knowingly, cruelly, carelessly, callously, and deliberately with callous indifference to Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights failed to stop and failed to stop and failed to intervene in an illegal and unlawful operation that has prevented Fairchild from safely using a Stanley Mosk outside handicap ramp and sidewalk since at least August 2025. Defendant Nationwide intentionally and recklessly violated Fairchild's United States Fourteenth Amendment Due Process Clause constitutional civil rights, her California Constitution Article I, § 7 constitutional civil rights, and her civil rights protected pursuant to Title III of the Americans with Disabilities Act of 1990. On information and Defendant Nationwide Legal LLC directed and authorized all of Nationwide Legal's operational decisions relevant herein from its United States worldwide headquarters located 1609 James M. Wood Blvd., 2nd Floor, Los Angeles, CA 90015.

41. Defendant **RAPID LEGAL INC. (hereinafter "RAPID LEGAL") (California Secretary of State Entity Number 1740805)** is a California corporation with its principal place of business located at 15345 Fairfield Ranch Road, Suite 200, Chino Hills, CA 91709. Defendant Rapid Legal is a corporation formed under the laws of the state of California. In the state of California, Rapid Legal Inc. does business as Rapid Legal. Rapid Legal's parent company is Proceed (still doing business as Counsel Press Holdings Inc.), which is a foreign corporation headquartered at 10 East 40th Street, 5th Floor, New York, NY 10016 and formed under the laws of the State of Delaware (**Delaware Division of Corporations Entity Number**

1 **5703049**). In the state of California, Counsel Press Inc. does business as Rapid Legal
2 **(California Secretary of State Foreign Corporation Entity Number 3767917)**. Defendant
3 Rapid Legal acted under the color of law by its illegal and unlawful actions, decisions, and
4 misconduct of willfully, recklessly, maliciously, knowingly, cruelly, carelessly, callously, and
5 deliberately with callous indifference to Plaintiff Alison Helen Fairchild's federally protected
6 constitutional civil rights failed to stop, and failed to intervene in an illegal and unlawful
7 operation that has prevented Fairchild from safely using a Stanley Mosk outside handicap ramp
8 and sidewalk since at least August 2025. Defendant Rapid Legal intentionally and recklessly
9 violated Fairchild's United States Fourteenth Amendment Due Process Clause constitutional
10 civil rights, her California Constitution Article I, § 7 constitutional civil rights, and her civil
11 rights protected pursuant to Title III of the Americans with Disabilities Act of 1990. On
12 information and Defendant Rapid Legal Inc. directed and authorized all of Nationwide Legal's
13 operational decisions relevant herein from its United States worldwide headquarters located at
14 15345 Fairfield Ranch Road, Suite 200, Chino Hills, CA 90015.

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16 42. Defendant **JOSE FLORES (hereinafter "Flores")** is a fifty-something-year-old United
17 States citizen who resides in the judicial district of this United States Court. Nationwide Legal
18 LLC gainfully employs Defendant Flores as the company's office manager. Defendant Flores
19 engaged in the reckless and wanton misconduct complained of herein while working in the
20 course and scope of his employment with Nationwide Legal LLC. Defendant Flores is currently
21 being sued in his official capacity as an employee of Nationwide Legal LLC and in his personal
22 capacity as a citizen of the United States. Defendant Flores acted under the color of law by his
23 illegal and unlawful actions, decisions, and misconduct of willfully, recklessly, maliciously,
24 knowingly, cruelly, carelessly, and deliberately with callous indifference to Plaintiff Alison
25 Helen Fairchild's federally protected constitutional civil rights failed to stop and failed to
26 intervene in an illegal and unlawful operation that has prevented Fairchild from safely using a
27 Stanley Mosk outside handicap ramp and sidewalk since at least August 2025. Defendant Jose
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Flores intentionally and recklessly violated Fairchild's United States Fourteenth Amendment Due Process Clause constitutional civil rights, her California Constitution Article I, § 7 constitutional civil rights, and her civil rights protected pursuant to Title III of the Americans with Disabilities Act of 1990. Defendant Flores resides in the judicial district of this United States District Court. Defendant Flores is not entitled to any type, shape, or form of immunity.

43. Defendant **TATIANNA SIMOES-SILVA (hereinafter "Silva")** is a forty-something-year-old United States citizen who resides in the judicial district of this United States Court. Rapid Legal Inc. gainfully employs Defendant Silva as the company's office manager. Defendant Silva engaged in the reckless and wanton misconduct complained of herein while working in the course and scope of her employment with Rapid Legal. Defendant Silva is currently being sued in her official capacity as an employee of Rapid Legal LLC and in her personal capacity as a citizen of the United States. Defendant Silva acted under the color of law by her illegal and unlawful actions, decisions, and misconduct of willfully, recklessly, maliciously, knowingly, cruelly, carelessly, and deliberately with callous indifference to Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights failed to stop and failed to intervene in an illegal and unlawful operation that has prevented Fairchild from safely using a Stanley Mosk outside handicap ramp and sidewalk since at least August 2025. Defendant Silva intentionally and recklessly violated Fairchild's United States Fourteenth Amendment Due Process Clause constitutional civil rights, her California Constitution Article I, § 7 constitutional civil rights, and her civil rights protected pursuant to Title III of the Americans with Disabilities Act of 1990. Defendant Silva resides in the judicial district of this United States District Court. Defendant Silva is not entitled to any type, shape, or form of immunity.

1 44. **Defendant COUNTY OF LOS ANGELES** is a municipal entity with the capacity to
2 sue and be sued. The County of Los Angeles is a Charter law County under the laws of the State
3 of California. Defendant Robert G. Luna has been responsible for the oversight, supervision, and
4 training of the County of Los Angeles Sheriff's Department [**hereinafter "LASD"**] since he
5 assumed public office on December 3, 2022. Defendants Hilda Lucia Solis and Holly J. Mitchell
6 have been responsible for the oversight, supervision, and authority of all County of Los Angeles
7 public agencies and departments since their elections in late 2020 and 2022, respectively.
8 Defendant County of Los Angeles was at all times relevant in this original constitutional civil
9 rights complaint, the employer of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G.
10 Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, and
11 Gerardo Valdivia, & some of DOES 1-10.

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13 45. County of Los Angeles departments are the Fire Department, Health Services, Public
14 Health, Public Social Services, Public Works, District Attorney, Public Defender, Probation and
15 Sheriff's Department. The County of Los Angeles Superior Court is the county's court of
16 general jurisdiction. The employees of Defendant Los Angeles County have engaged in the acts
17 complained of herein pursuant to the policies, practices, customs, traditions, and procedures of
18 the County of Los Angeles.

19
20 46. Defendant County of Los Angeles was at all times relevant herein a municipal entity
21 created and authorized under the laws of the State of California. Defendant County of Los
22 Angeles is the legal entity responsible for itself and for the County of Los Angeles Sheriff's
23 Department. Defendant County of Los Angeles is the employer of the individual County of Los
24 Angeles Defendants and is a proper entity to be sued under 42 U.S.C. § 1983.

25
26 47. **Defendant COUNTY OF LOS ANGELES** was, at all times relevant herein, authorized
27 by law to maintain, and did maintain, a law enforcement agency known as the County of Los
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Angeles Sheriff's Department, which acted as an agent in the area of law enforcement, including, without limitation, conducting investigations, evaluating, and causing charges to be brought against alleged crimes, and condoning, allowing, and tolerating failed to stop and failed to intervene in an illegal and unlawful operation created by County of Los Angeles employees and private actors that has prevented Fairchild from safely using a Stanley Mosk outside handicap ramp and sidewalk since at least August 2025, in which these County of Los Angeles employees and private actors had all engaged in under color of law quasi-government activities as herein alleged by Plaintiff Fairchild.

48. Plaintiff **ALISON HELEN FAIRCHILD** is unaware of the true and proper names of Defendants listed as DOES 1 through 10, inclusive, and therefore sues them by the fictitious preceding names. The plaintiff will amend his original constitutional civil rights complaint by inserting the proper names in place of the fictitious names, together with appropriate charging words, once the actual names are ascertained. Plaintiff Fairchild is informed and believes and thereon alleges that each of the Defendants designated herein as a DOE is responsible and liable to Plaintiff in some manner for the events, happenings, and contention referred to in this original constitutional civil rights complaint. All references herein to "Defendant or "Defendants" shall be deemed to include all DOE Defendants.

49. Plaintiff **ALISON HELEN FAIRCHILD** is informed and believes and thereon alleges that each Defendant, including DOES 1 through 10, was and is the agent, employee, servant, subsidiary, partner, member, associate, co-conspirator, acquaintance, friend, ally, supporter, accessory, amigo, comrade, backer, abettor, instigator sympathizer, confidant or representative of each other Defendant, and that all of the things alleged to have been done in the course and scope of said agency, employment, service, subsidiary, partnership, membership, association, private citizen to local government relationship, or representative relationship and with the

knowledge and consent of their respective principals, employers, masters, parent corporations, partners, members, associates, or representatives. Each Defendant has authorized, ratified, acknowledged, consented, authorized, accepted, acquiesced, permitted, allowed, condoned, excused, overlooked, pardoned, tolerated, and approved of all illegal acts, actions, conduct, misconduct, misdeeds, transgressions, and omissions by each other Defendant. Plaintiff Alison Helen Fairchild is informed and believes, and thereon alleges, that each of the fictitiously named Defendants are responsible in some manner for the occurrences alleged in this original civil rights complaint, and Plaintiff **ALISON HELEN FAIRCHILD'S** compensatory damages, punitive damages, general damages, and special damages as alleged in this original constitutional civil rights complaint was proximately caused by those Defendants.

50. The allegations of this original constitutional civil rights complaint, based on information and belief, will likely have evidentiary support after a reasonable opportunity for further investigation and discovery. Such include issuing federal district court subpoenas duces tecum, the taking of oral depositions, and serving of pretrial discovery in the form of Requests for Admission and Special Interrogatories, all of which Plaintiff **ALISON HELEN FAIRCHILD** intends to conduct after the Rule 26(f) conference.

XII. CONTINUING VIOLATIONS

51. The wrongful acts and omissions giving rise to the Defendants' liability in this original constitutional civil rights action commenced on or about August 1, 2025, and have been and are "continuing" in nature as of the date of filing of this constitutional civil rights complaint on or about July 9, 2025. Plaintiff **ALISON HELEN FAIRCHILD**, therefore, HEREBY reserves her right to amend this original constitutional civil rights complaint (Into her FAC) as new and additional facts and claims arise or become known to Plaintiff Fairchild.

XIII. FACTS

**GENERAL ALLEGATIONS OF CONSTITUTIONAL CIVIL RIGHTS
COMPLAINT IN SUPPORT OF PLAINTIFF ALISON HELEN FAIRCHILD
CLAIMS FOR RELIEF, REQUESTED RELIEF & DAMAGES**

52. Several times during the years 2015, 2016, 2017, and 2018 County of Los Angeles has willfully, recklessly, knowingly, cruelly, deliberately, carelessly, wantonly, fraudulently, and callously allowed legal document process servers, court document runners, legal courier messengers, and biker messengers employed by County of Los Angeles's longstanding co-conspirators Rapid Legal, ABC Legal, Pro Legal, United Legal, Countywide Process LLC, Nationwide Legal, First Legal, One Legal, and many other companies to impede, block, hijack, illegally occupy, obstruct Superior Court of California, County of Los Angeles, Stanley Mosk Superior Court entrances, exits, outside of Stanley Mosk courthouse handicap ramps, inside court hallways, inside court hallways, and the outside court handicap ramp leading to the 2nd Floor court entrance.

53. On June 5, 2025, the County of Los Angeles recklessly filed a frivolous workplace violence petition against KING AROGANT. The petition In Superior Court of California, County of Los Angeles, Stanley Mosk Courthouse civil case **25STRO03574** was so frivolous that County of Los Angeles employees committed perjury on August 19, 2025 by testifying falsely that KING AROGANT entered the Alhambra DA office with aggressively holding scissors and then on April 17, 2025 confronted Brian MARK Rosenberg outside of the Alhambra DA office and trigged an Alhambra DA office evacuation. The frivolous petition further alleged that KING AROGANT had been arrested for sending emails to Brian MARK Rosenberg, a case which was later dismissed (**25CJCM02162-01**). KING AROGANT'S

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1 uploaded GoPro video recording of his February 4, 2025, Alhambra DA office proves by clear
2 and convincing evidence that he did nothing wrong and was never in possession of scissors
3 while inside the Alhambra DA office. See now the YouTube video recording of KING
4 AROGANT'S February 4, 2025, County of Los Angeles District Attorney's Office visit
5 attached hereto and below:

6
7 <https://youtu.be/l9DqwQWLgfU?si=gfPCydP9jH5hO8zF>
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10 KING AROGANT'S uploaded YouTube converted Samsung S25 Ultra audio recording
11 of his April 17, 2025, Superior of California, County of Los Angeles, Alhambra Superior
12 Courthouse's visit to Lisa Jackson to file criminal court papers proves by clear and convincing
13 evidence that he did nothing wrong, never encountered any County of Los Angeles District
14 Attorney's Office employees, and never contributed to its racially animus "fake office
15 evacuation in furtherance of the County of Los Angeles's secret plans to file a frivolous
16 workplace violence petition against KING AROGANT just two months later. See now the
17 YouTube video recording of KING AROGANT'S April 17, 2025, Superior Court of California,
18 County of Los Angeles, Alhambra Superior Court visit to meet with court administrator Lisa
19 Jackson, attached hereto and below:

20
21 https://youtu.be/25Y_Z3CgTfQ?si=D9ugHskBNAqVM4iV
22
23

24 54. On August 4, 2025, Fairchild left her home and travelled to the Stanley Mosk Superior
25 Court by train. At approximately 2 PM, Fairchild arrived at the Stanley Mosk Courthouse's
26 outside handicap ramp so that she could use the handicap ramp to safely arrive at the
27
28

1 courthouse's second-floor entrance. Fairchild was unable to use this handicap ramp due to
2 numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over and
3 otherwise, illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley
4 Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking
5 marijuana, and smoking crystal methamphetamine in plain sight and while incompetent peace
6 officers were seated in their marked vehicles just feet away. Fairchild could smell marijuana and
7 alcohol on these individuals. On August 4, 2025, as Fairchild tried to physically enter the
8 handicap ramp that would help her safely arrive at the doorstep of the Stanley Mosk Superior
9 courthouse's second-floor entrance, a tall Mexican American man approached Fairchild while
10 entirely blocking the handicapped ramp and said to Fairchild the following verbatim:

11
12 *We are working here! Go away now, you crippled old lady.*
13

14 Fairchild's body was visibly shaking after this individual approached her, so she left and
15 went home instead of entering the Stanley Mosk Superior Court. The purpose of Fairchild's
16 court visit was to retrieve a copy of all court documents filed in frivolous civil case
17 25STR03574. On information and belief, the individuals illegally occupying, trespassing, and
18 willfully, recklessly, maliciously, carelessly, knowingly, deliberately, and callously blocking
19 this entrance of this handicap ramp on August 4, 2025, were employed by Defendants Silva,
20 Flores, Rapid Legal, Nationwide Legal, and One Legal.

21
22 55. On August 12, 2025, Fairchild left her home and travelled to the Stanley Mosk Superior
23 Court by train. At approximately 1 PM, Fairchild arrived at the Stanley Mosk Courthouse's
24 outside handicap ramp so that she could use the handicap ramp to safely arrive at the
25 courthouse's second-floor entrance. Fairchild was unable to use this handicap ramp due to
26 numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over and
27 otherwise illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley
28

1 Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking
2 marijuana, and smoking crystal methamphetamine in plain sight and while incompetent peace
3 officers were seated in their marked vehicles just feet away. Fairchild could smell marijuana and
4 alcohol on these individuals. On August 12, 2025, as Fairchild tried to physically enter the
5 handicap ramp that would help her safely arrive at the doorstep of the Stanley Mosk Superior
6 courthouse's second-floor entrance, a short, well-dressed Caucasian man approached Fairchild
7 while entirely blocking the handicapped ramp by placing his arms on both sides of the ramp's
8 guardrails and said to Fairchild the following verbatim:

9
10 *"I am sorry, Ms., you cannot go up because it is closed due to us working here."*
11

12 Fairchild's body was visibly shaking after this individual approached her, so she left and
13 went home instead of entering the Stanley Mosk Superior Court. The purpose of Fairchild's
14 court visit was to retrieve a copy of all court documents filed in frivolous civil case
15 25STR03574 and file legal court pleadings on behalf of KING AROGANT on the fourth floor
16 of the Stanley Mosk Courthouse. On information and belief, the individuals illegally occupying,
17 trespassing, and willfully, recklessly, maliciously, carelessly, knowingly, deliberately, and
18 callously blocking this entrance of this handicap ramp on August 12, 2025, were employed by
19 Defendants Silva, Flores, Rapid Legal, Nationwide Legal, and One Legal.
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21 56. On August 27, 2025, Fairchild left her home and travelled to the Stanley Mosk Superior
22 Court by train. At approximately 3:20 PM, Fairchild arrived at the Stanley Mosk Courthouse's
23 outside handicap ramp so that she could use the handicap ramp to safely arrive at the
24 courthouse's second-floor entrance. Fairchild was unable to use this handicap ramp due to
25 numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over, and
26 otherwise illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley
27 Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking
28

1 marijuana, and smoking crystal methamphetamine in plain sight and while incompetent peace
2 officers were seated in their marked vehicles just feet away. Fairchild could smell marijuana and
3 alcohol on these individuals. On August 27, 2025, Fairchild was unable to physically enter the
4 handicap ramp that would help her safely arrive at the doorstep of the Stanley Mosk
5 Courthouse's second-floor entrance because this handicap ramp that would help her travel to the
6 second floor entrance was entirely blocked by at least five individuals who were standing in
7 front of the handicap ramp's entrance while chatting amongst each other in a large group.

8
9 Fairchild's body was visibly shaking after seeing numerous intimidating-looking men
10 blocking her path, so she left and went home instead of entering the Stanley Mosk Superior
11 Court. The purpose of Fairchild's court visit was to retrieve a copy of Brian MARK
12 Rosenberg's frivolous November 2023 civil harassment petition and visit the self-help clinic for
13 family law on the 5th floor. On information and belief, the individuals illegally occupying,
14 trespassing, and willfully, recklessly, maliciously, carelessly, knowingly, deliberately, and
15 callously blocking this entrance of this handicap ramp on August 27, 2025, were employed by
16 Defendants Silva, Flores, Rapid Legal, Nationwide Legal, and One Legal.

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18 57. On September 5, 2025, both KING AROGANT and Fairchild were present across the
19 street from the Stanley Mosk Superior Court. Still, Fairchild requested to leave and go home
20 after seeing from across the street numerous individuals standing in front of the handicap ramp
21 that she would need to travel through to safely arrive at the court's second-floor entrance. On
22 information and belief, the individuals illegally occupying, trespassing, and willfully, recklessly,
23 maliciously, carelessly, knowingly, deliberately, and callously blocking this entrance of this
24 handicap ramp on September 5, 2025, were employed by Defendants Silva, Flores, Rapid Legal,
25 Nationwide Legal, and One Legal.

58. On September 15, 2025, Fairchild left her home and travelled to the Stanley Mosk Superior Court by train. At approximately 1:30 PM, Fairchild arrived at the Stanley Mosk Courthouse's outside handicap ramp so that she could use the handicap ramp to safely arrive at the courthouse's second-floor entrance. Fairchild was unable to use this handicap ramp due to numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over and otherwise illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight and while incompetent peace officers were seated in their marked vehicles just feet away. Fairchild could smell marijuana and alcohol on these individuals. On September 15, 2025, as Fairchild tried to physically enter the handicap ramp that would help her safely arrive at the doorstep of the Stanley Mosk Superior courthouse's second-floor entrance, a short, well-dressed Hispanic man approached Fairchild while entirely blocking the handicapped ramp by placing his arms on both sides of the ramp's guardrails and said to Fairchild the following verbatim:

“What are you doing, you stupid crippled bitch! Can’t you see we are working here!”

Fairchild's body was visibly shaking after this individual approached her, so she left and went home instead of entering the Stanley Mosk Superior Court. The purpose of Fairchild's court visit was to retrieve a copy of all court documents filed in frivolous civil case 25STR03574 and file legal court pleadings on behalf of KING AROGANT on the fourth floor of the Stanley Mosk Courthouse. On information and belief, the individuals illegally occupying, trespassing, and willfully, recklessly, maliciously, carelessly, knowingly, deliberately, and callously blocking this entrance of this handicap ramp on September 15, 2025, were employed by Defendants Silva, Flores, Rapid Legal, Nationwide Legal, and One Legal.

59. On September 24, 2025, Fairchild left her home and travelled to the Stanley Mosk Superior Court by train. At approximately 2:20 PM, Fairchild arrived at the Stanley Mosk Courthouse's outside handicap ramp so that she could use the handicap ramp to safely arrive at the courthouse's second-floor entrance. Fairchild was unable to use this handicap ramp due to numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over and otherwise illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight and while incompetent peace officers were seated in their marked vehicles just feet away. Fairchild could smell marijuana and alcohol on these individuals. On September 24, 2025, Fairchild was unable to physically enter the handicap ramp that would help her safely arrive at the doorstep of the Stanley Mosk Courthouse's second-floor entrance because this handicap ramp that would help her travel to the second floor entrance was entirely blocked by at least five individuals and a pitbull looking dog all who were standing in front of the handicap ramp's entrance while chatting amongst each other in a large group.

Fairchild's body was visibly shaking after seeing numerous intimidating-looking men and a pit bull-looking dog blocking her path, so she left and went home instead of entering the Stanley Mosk Superior Court. The purpose of Fairchild's court visit was to retrieve a copy of minute orders from frivolous case 25STR03574 and visit the self-help clinic for family law on the 5th floor. On information and belief, the individuals illegally occupying, trespassing, and willfully, recklessly, maliciously, carelessly, knowingly, deliberately, and callously blocking the entrance of this handicap ramp on September 24, 2025, were employed by Defendants Silva, Flores, Rapid Legal, Nationwide Legal, and One Legal.

60. On October 13, 2025, Fairchild left her home and travelled to the Stanley Mosk Superior Court by train. At approximately 3:10 PM, Fairchild arrived at the Stanley Mosk Courthouse's outside handicap ramp so that she could use the handicap ramp to safely arrive at the courthouse's second-floor entrance. Fairchild was unable to use this handicap ramp due to numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over and otherwise illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight and while incompetent peace officers were seated in their marked vehicles just feet away. Fairchild could smell marijuana and alcohol on these individuals. On September 24, 2025, Fairchild was unable to physically enter the handicap ramp that would help her safely arrive at the doorstep of the Stanley Mosk Courthouse's second-floor entrance because this handicap ramp that would help her travel to the second floor entrance was entirely blocked by at least five individuals and a pitbull-looking dog all who were standing in front of the handicap ramp's entrance while chatting amongst each other in a large group.

Fairchild's body was visibly shaking after seeing numerous intimidating-looking men and a pitbull-looking dog blocking her path, so she left and went home instead of entering the Stanley Mosk Superior Court. The purpose of Fairchild's court visit was to retrieve a copy of minute orders from frivolous case 25STR03574 and visit the self-help clinic for family law on the 5th floor. On information and belief, the individuals illegally occupying, trespassing, and willfully, recklessly, maliciously, carelessly, knowingly, deliberately, and callously blocking this entrance of this handicap ramp on October 13, 2025, were employed by Defendants Silva, Flores, Rapid Legal, Nationwide Legal, and One Legal.

61. On October 29, 2025, Fairchild left her home and travelled to the Stanley Mosk Superior Court by train. At approximately 2:20 PM, Fairchild arrived at the Stanley Mosk Courthouse's

1 outside handicap ramp so that she could use the handicap ramp to safely arrive at the
2 courthouse's second-floor entrance. Fairchild was unable to use this handicap ramp due to
3 numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over and
4 otherwise illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley
5 Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking
6 marijuana, and smoking crystal methamphetamine in plain sight and while incompetent peace
7 officers were seated in their marked vehicles just feet away. Fairchild could smell marijuana and
8 alcohol on these individuals. On October 29, 2025, Fairchild was unable to physically enter the
9 handicap ramp that would help her safely arrive at the doorstep of the Stanley Mosk
10 Courthouse's second-floor entrance because this handicap ramp that would help her travel to the
11 second floor entrance was entirely blocked by at least five individuals who were standing in
12 front of the handicap ramp's entrance while chatting amongst each other in a large group.

13
14 Fairchild's body was visibly shaking after seeing numerous intimidating-looking men
15 blocking her path, so she left and went home instead of entering the Stanley Mosk Superior
16 Court. The purpose of Fairchild's court visit was to retrieve a copy of minute orders from
17 frivolous case 25STR03574 and visit the self-help clinic for family law on the 5th floor. On
18 information and belief, the individuals illegally occupying, trespassing, and willfully, recklessly,
19 maliciously, carelessly, knowingly, deliberately, and callously blocking this entrance of this
20 handicap ramp on October 29, 2025, were employed by Defendants Silva, Flores, Rapid Legal,
21 Nationwide Legal, and One Legal.

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23 62. On November 4, 2025, Fairchild submitted a public comment to all five County of Los
24 Angeles board of supervisors (including Defendants Mitchell and Solis), warning them of legal
25 action if they continued to allow employees of legal processing companies to block her access
26 on the Stanley Mosk Superior Court. In her written public comment made part of the November
27 2, 2025, public board meeting, Fairchild stated the following:

28

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE HED & AGAINST PRIVATE PARTY DEFENDANTS.

County of Los Angeles, David Wayne Slayton and Deni K. Butler are hereby being forewarned that their reckless failure to immediately remove these loitering and soliciting individuals from being anywhere near these Superior Court of California, County of Los Angeles, Stanley Mosk Superior Court entrances, exits, outside handicap ramps, inside court hallways, inside court hallways, and outside court handicap ramp leading to 2nd Floor court entrance will result in a civil rights being filed against them all, and each of them.

A copy of Fairchild's November 4, 2025, public comment was electronically served upon Holly J. Mitchell (hollyjmitchell@bos.lacounty.gov) and Hilda Lucia Solis (firstdistrict@bos.lacounty.gov)

63. On November 10, 2025, Fairchild left her home and travelled to the Stanley Mosk Superior Court by train. At approximately 1:30 PM, Fairchild arrived at the Stanley Mosk Courthouse's outside handicap ramp so that she could use the handicap ramp to safely arrive at the courthouse's second-floor entrance. Fairchild was unable to use this handicap ramp due to numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over and otherwise illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight, and while incompetent peace officers were seated in their marked vehicles just feet away. Fairchild could smell marijuana and alcohol on these individuals. On November 10, 2025, Fairchild was unable to physically enter the handicap ramp that would help her safely arrive at the doorstep of the Stanley Mosk Courthouse's second-floor entrance because this handicap ramp that would help her travel to the second floor entrance was entirely blocked by several large boxes that had the following writing on them:

1 **LEGAL LIT LLC**

2 **EXCELSIOR**

3 www.excelsfordigital.com

4 **(310) 553-8100**

5
6 Fairchild's body was visibly shaking after seeing numerous legal boxes and a metal cart
7 entirely blocking the entrance of the handicap ramp, so she left and went home instead of
8 entering the Stanley Mosk Superior Court. The purpose of Fairchild's court visit was to retrieve
9 minutes orders, file legal pleadings on behalf of KING AROGANT in frivolous case
10 25STR03574, and visit the self-help clinic for family law on the 5th floor. On information and
11 belief, the individuals illegally occupying, trespassing, and willfully, recklessly, maliciously,
12 carelessly, knowingly, deliberately, and callously blocking this entrance of this handicap ramp
13 on November 10, 2025, were employed by Defendants Silva, Flores, Rapid Legal, Nationwide
14 Legal, and One Legal.

15
16 64. On the early morning of November 17, 2025, KING AROGANT requested that his
17 fiancée Alison Helen Fairchild accompany him to his court hearing in department 25 of the
18 Stanley Mosk Superior Court. Fairchild told KING AROGANT she wanted to be there to
19 support him, but was too distressed about the previous times she had arrived at the courthouse
20 and saw individuals blocking her path on the handicap ramp she used to arrive safely on the
21 second floor entrance of the Stanley Mosk Courthouse.

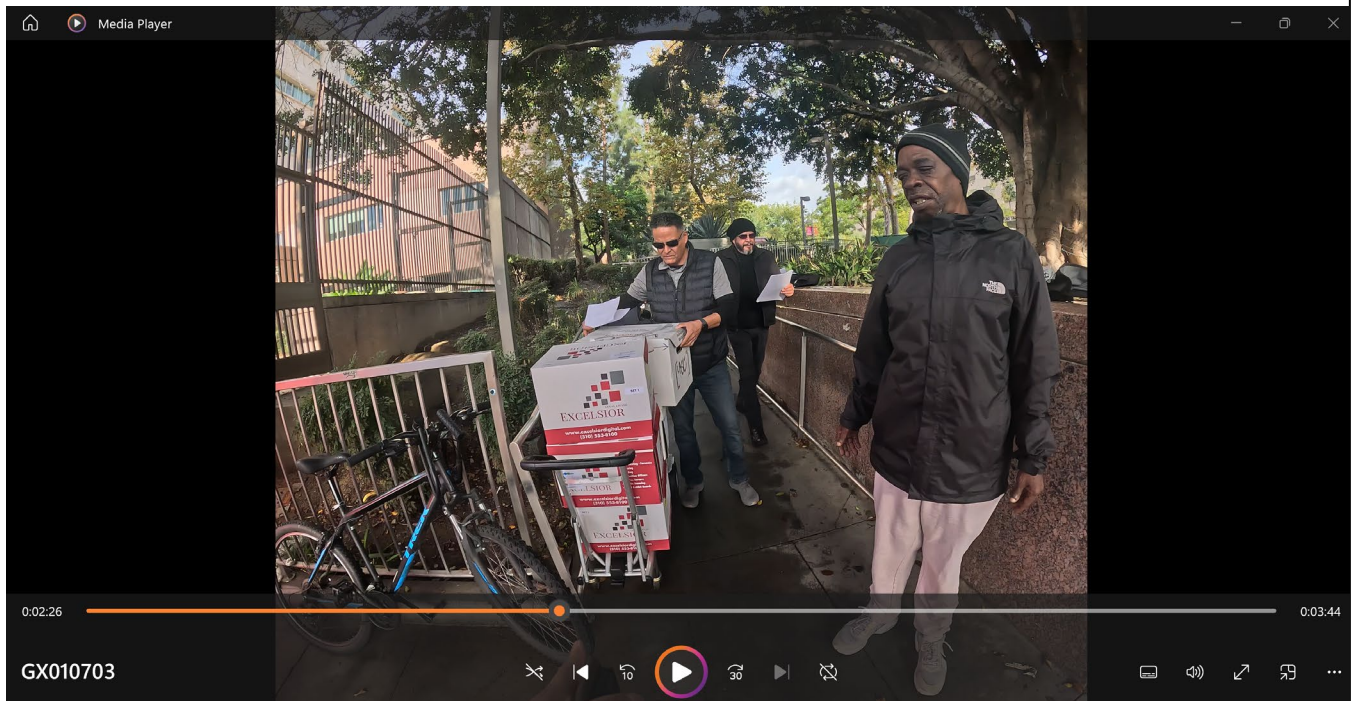
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23 65. On the early morning of November 17, 2025, KING AROGANT left his home and
24 travelled to the Stanley Mosk Superior Court by train. At approximately 7:45 AM, KING
25 AROGANT arrived at the Stanley Mosk Courthouse's outside handicap ramp so that he could
26 film for evidence individuals who were willfully, knowingly, cruelly, wantonly, carelessly,
27 recklessly, fraudulently, deliberately, and callously blocking Fairchild from using the handicap
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Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE HED & AGAINST PRIVATE PARTY DEFENDANTS.

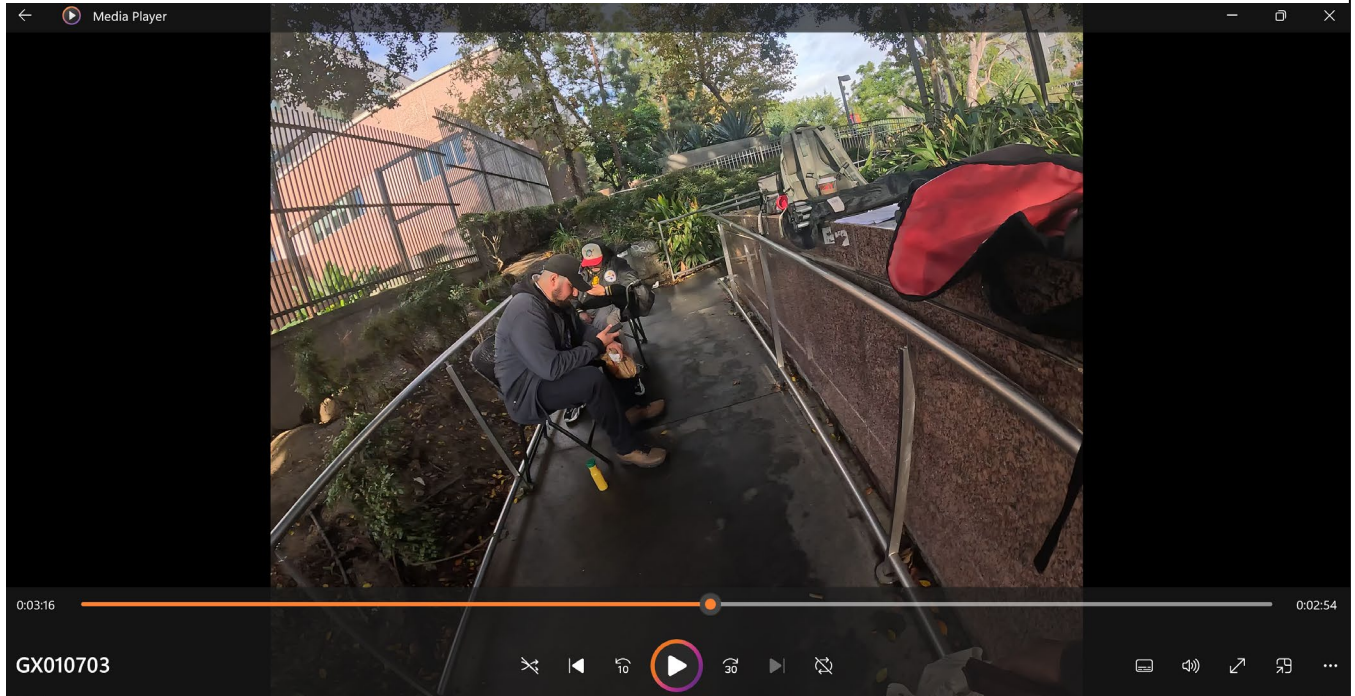
1 ramp to safely arrive at the courthouse's second-floor entrance. When KING AROGANT
2 entered this handicap ramp, he eye-witnessed numerous human beings leaning on, standing on,
3 putting a chair on, hijacking, taking over, and otherwise illegally occupying, trespassing,
4 loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp. KING
5 AROGANT himself had difficulty walking on the ramp as individuals were camping on it with
6 chairs while falling asleep. It would have been impossible for Fairchild to safely pass through
7 the handicap ramp, given the numerous individuals and chairs standing or sitting on the ADA
8 ramp. KING AROGANT told those individuals blocking the ramp that they could not be on the
9 ramp and that his fiancée, Alison Helen Fairchild, did not want to come to court today with him
10 because people were blocking the handicap ramp! On information and belief, the individuals
11 illegally occupying, trespassing, and willfully, recklessly, maliciously, carelessly, knowingly,
12 deliberately, and callously blocking this entrance of this handicap ramp on November 17, 2025,
13 were employed by Defendants Silva, Flores, Rapid Legal, Nationwide Legal, and One Legal. See
14 now ***Exhibit 3***, a true and correct copy of several images taken from KING AROGANT'S
15 GoPro camera's GX010703 video recording that proves by clear and convincing evidence that
16 several individuals are constantly illegally occupying a handicap ramp they had no business
17 being on in the first place, attached hereto and below:

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Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR OF LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE HED & AGAINST PRIVATE PARTY DEFENDANTS.



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66. On the early morning of November 17, 2025, after arriving at the second-floor entrance of the Stanley Mosk Superior Court, KING AROGANT spoke to Defendant Gerardo Valdivia and told him that he needed to immediately remove the individuals blocking the Stanley Mosk Superior Court handicap ramp that leads to the second-floor entrance of the courthouse. Valdivia replied by telling KING AROGANT that he was the watch commander and in charge of only the inside of the Stanley Mosk Superior Court.

67. On November 17, 2025, KING AROGANT hand-delivered a copy of Fairchild's November 18, 2025, public comment to County of Los Angeles head board specialist Francisco Garibay and personally told him that something needed to be immediately done about individuals constantly blocking the handicap ramp Fairchild used to enter the second-floor entrance of the Stanley Mosk Superior Court. KING AROGANT told Garibay in person that

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1 Fairchild has been unable to use the handicap ramp to assist him at the Stanley Mosk
2 Courthouse for the past several months.

3
4 68. On November 18, 2025, Fairchild submitted a public comment to all five County of Los
5 Angeles board of supervisors (including Defendants Mitchell and Solis), warning them of legal
6 action if they continued to allow employees of legal processing companies to block her access
7 on the Stanley Mosk Superior Court. In her written public comment made part of the November
8 18, 2025, public board meeting, Fairchild stated the following:

9
10 *County of Los Angeles, David Wayne Slayton and Deni K. Butler are hereby being*
11 *forewarned that their reckless failure to immediately remove these loitering and soliciting*
12 *individuals from being anywhere near these Superior Court of California, County of Los*
13 *Angeles, Stanley Mosk Superior Court entrances, exits, outside handicap ramps, inside court*
14 *hallways, inside court hallways, and outside court handicap ramp leading to 2nd Floor court*
15 *entrance will result in a civil rights being filed against them all, and each of them.*

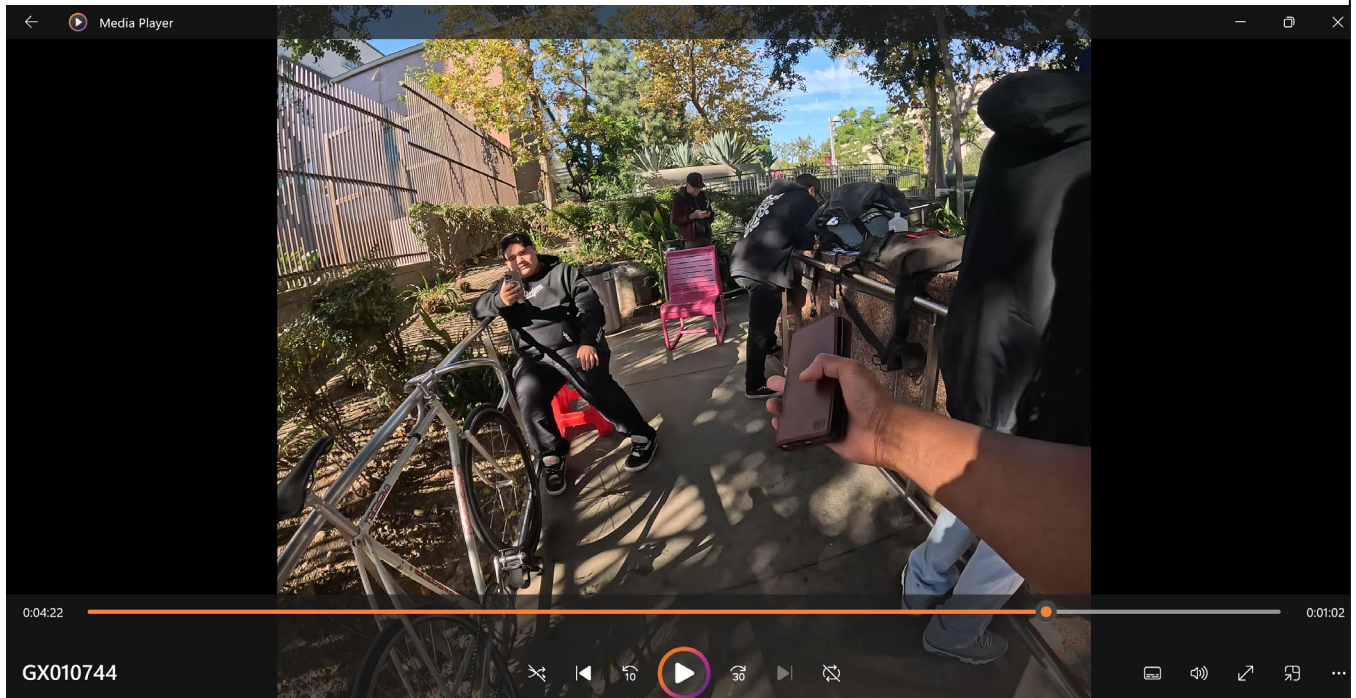
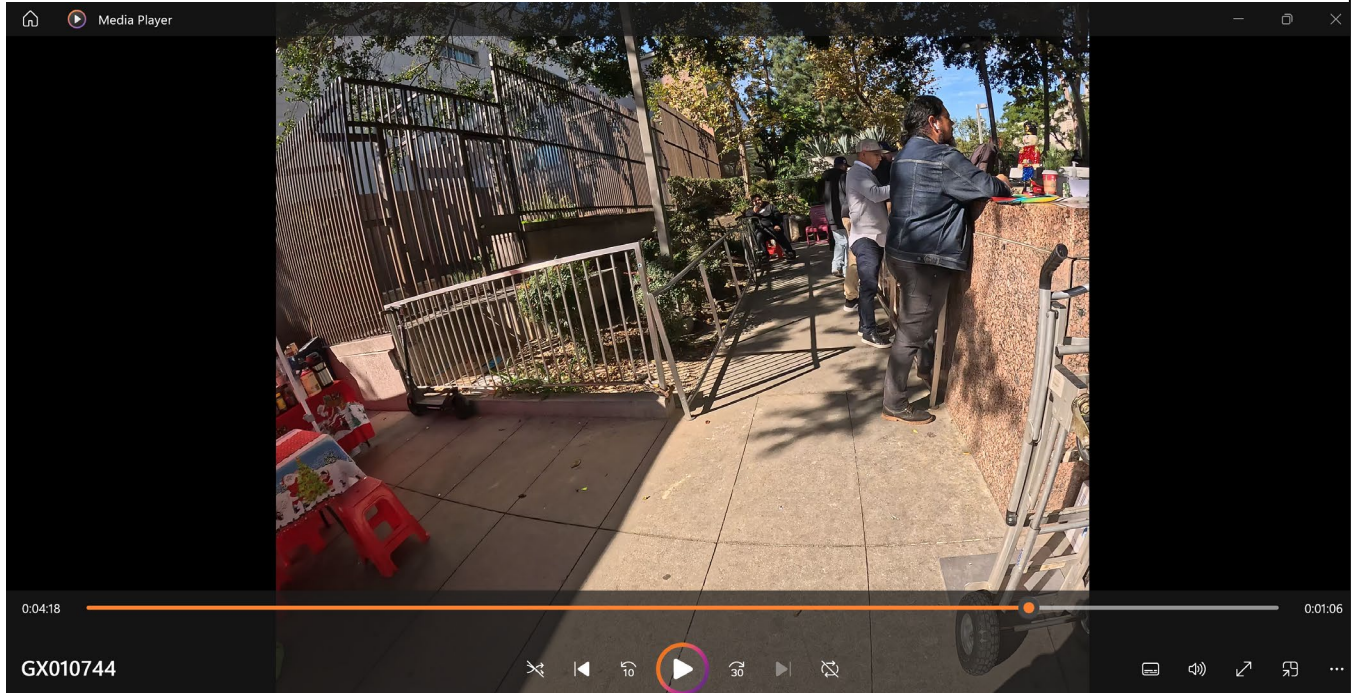
16
17 *A copy of Fairchild's November 18, 2025, public comment was electronically served*
18 *upon Holly J. Mitchell (hollyjmitchell@bos.lacounty.gov and Hilda Lucia Solis*
19 *(firstdistrict@bos.lacounty.gov)*

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21 69. On the early morning of December 2, 2025, KING AROGANT left his home and
22 travelled to the Stanley Mosk Superior Court by train. At approximately 10:50 AM, KING
23 AROGANT arrived at the Stanley Mosk Courthouse's outside handicap ramp so that he could
24 film for evidence individuals who were willfully, knowingly, cruelly, wantonly, carelessly,
25 recklessly, fraudulently, deliberately, and callously blocking Fairchild from using the handicap
26 ramp to safely arrive at the courthouse's second-floor entrance. When KING AROGANT
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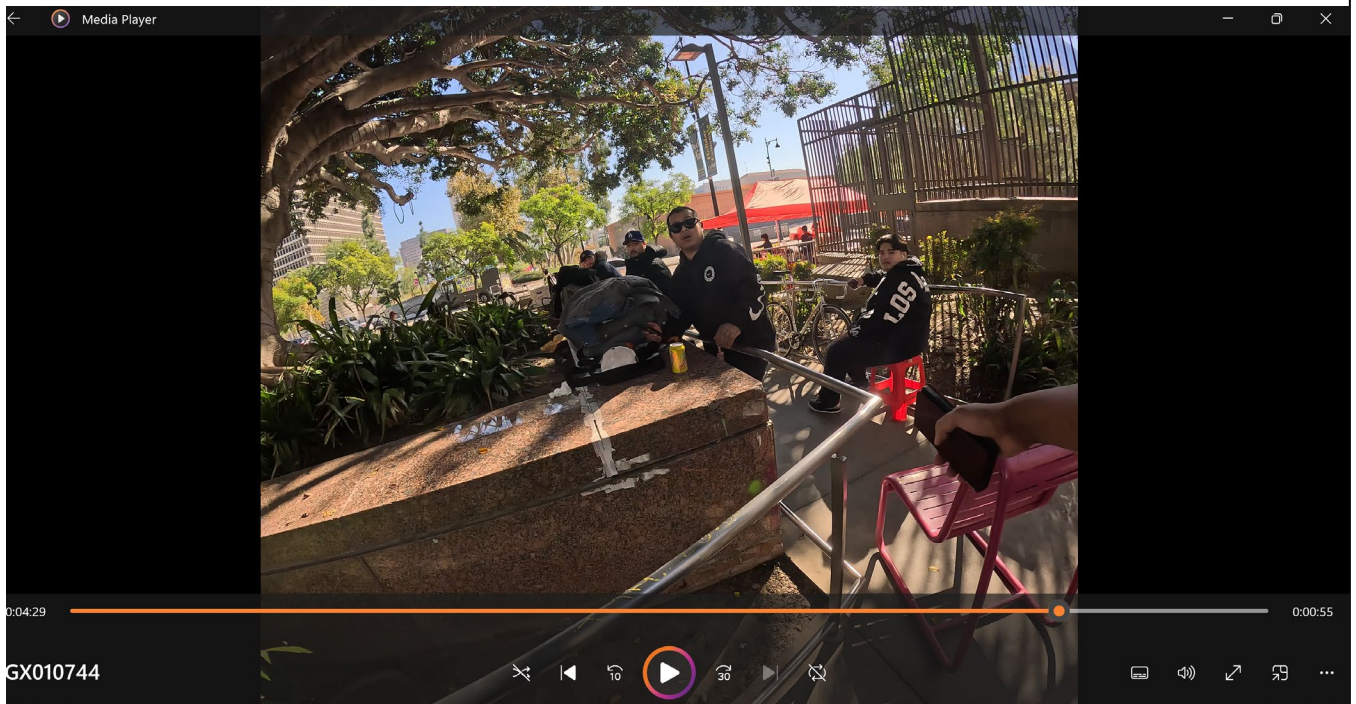
1 entered this handicap ramp, he eye-witnessed numerous human beings leaning on, standing on,
2 putting a chair on, hijacking, taking over, and otherwise illegally occupying, trespassing,
3 loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp. KING
4 AROGANT himself had difficulty walking on the ramp as individuals were camping on it with
5 chairs while falling asleep. On December 2, 2025, KING AROGANT also observed that these
6 individuals had recklessly placed a large pink metal chair on the ramp to further discourage
7 handicapped individuals from using it at all. It would have been impossible for Fairchild to
8 safely pass through the ADA ramp, given the numerous individuals and chairs standing or
9 seated on it. KING AROGANT told those individuals blocking the ramp that they could not be
10 on the ramp and that his fiancée, Alison Helen Fairchild, had been trying to enter the handicap
11 ramp, but they were all blocking it. KING AROGANT could smell marijuana and alcohol
12 coming from the individuals who were blocking the handicap ramp Fairchild needed to use to
13 safely arrive at the second-floor entrance of the Stanley Mosk Superior Court. On information
14 and belief, the individuals illegally occupying, trespassing, and willfully, recklessly,
15 maliciously, carelessly, knowingly, deliberately, and callously blocking this entrance of this
16 handicap ramp on December 2, 2025, were employed by Defendants Silva, Flores, Rapid Legal,
17 Nationwide Legal, and One Legal. See now ***Exhibit 4***, a true and correct copy of several images
18 taken from KING AROGANT'S GoPro camera's GX010744 video recording that proves by
19 clear and convincing evidence that several individuals are constantly illegally occupying a
20 handicap ramp they had no business being on in the first place, attached hereto and below:

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Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE IIED & AGAINST PRIVATE PARTY DEFENDANTS.



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See now attached hereto a true and correct copy of KING AROGANT'S December 2, 2025, GoPro video recording's YouTube weblink below and herein:

https://youtu.be/TV_SVbeCGmQ?si=17OzksFBfXzxZv1m

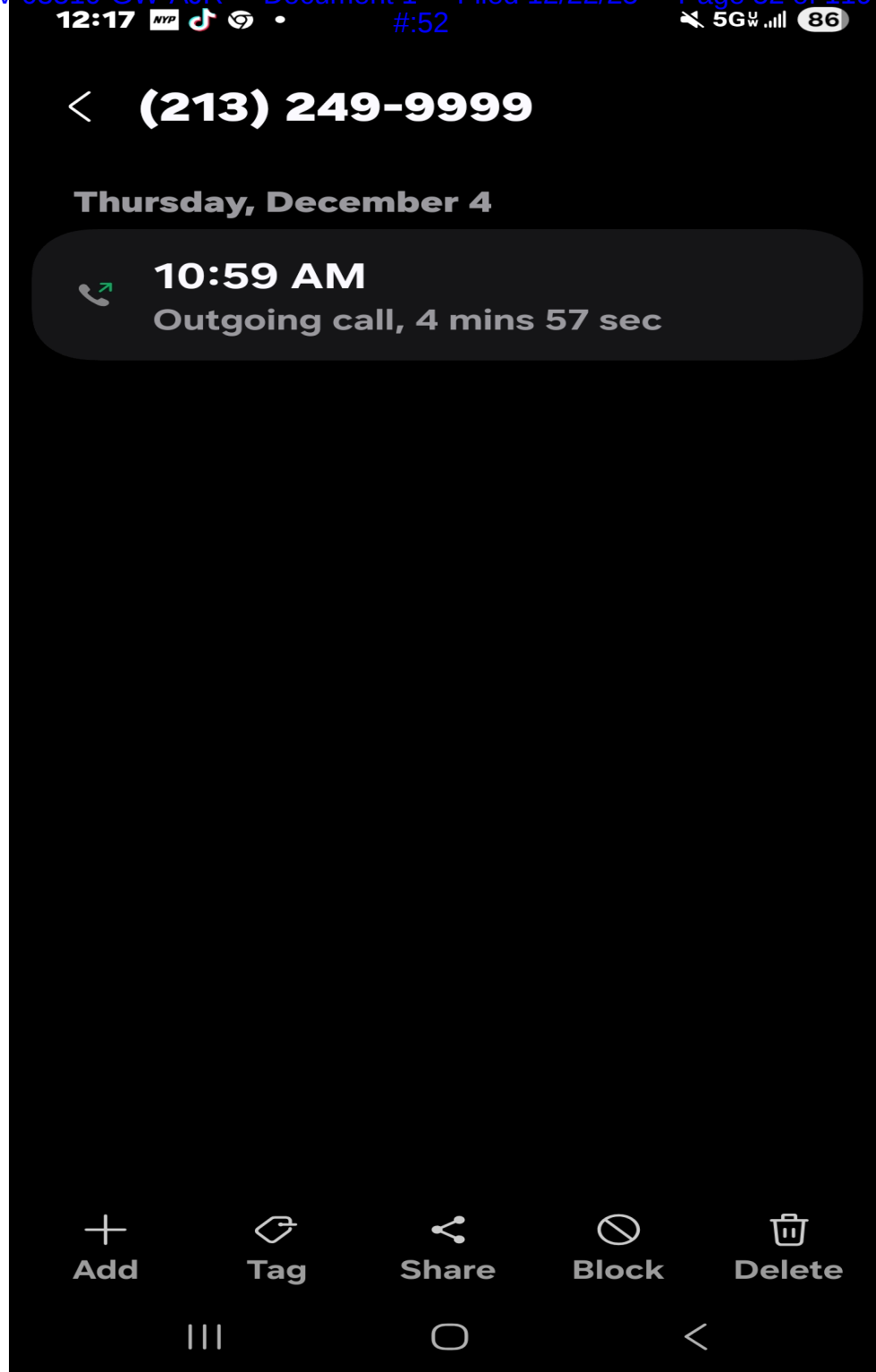
70. On December 2, 2025, Fairchild submitted a public comment to all five County of Los Angeles board of supervisors (including Defendants Mitchell and Solis), warning them of legal action if they continued to allow employees of legal processing companies to block her access on the Stanley Mosk Superior Court. In her written public comment made part of the December 2, 2025, public board meeting, Fairchild stated the following:

On the early morning of November 17, 2025, KING AROGANT was present at the handicap ramp complained upon to this ridiculous board of supervisors panel. KING AROGANT took photographs and video recordings that proved by clear and convincing evidence that County of Los Angeles continues to willfully, recklessly, wantonly, maliciously, deliberately, knowingly, carelessly, negligently, and callously allow individuals to loiter, solicit, obstruct, block, and solicit on the outside of the Stanley Superior Court's handicap ramp. See evidence below:

A copy of Fairchild's December 17, 2025, public comment was electronically served upon Holly J. Mitchell (hollyjmitchell@bos.lacounty.gov) and Hilda Lucia Solis (firstdistrict@bos.lacounty.gov)

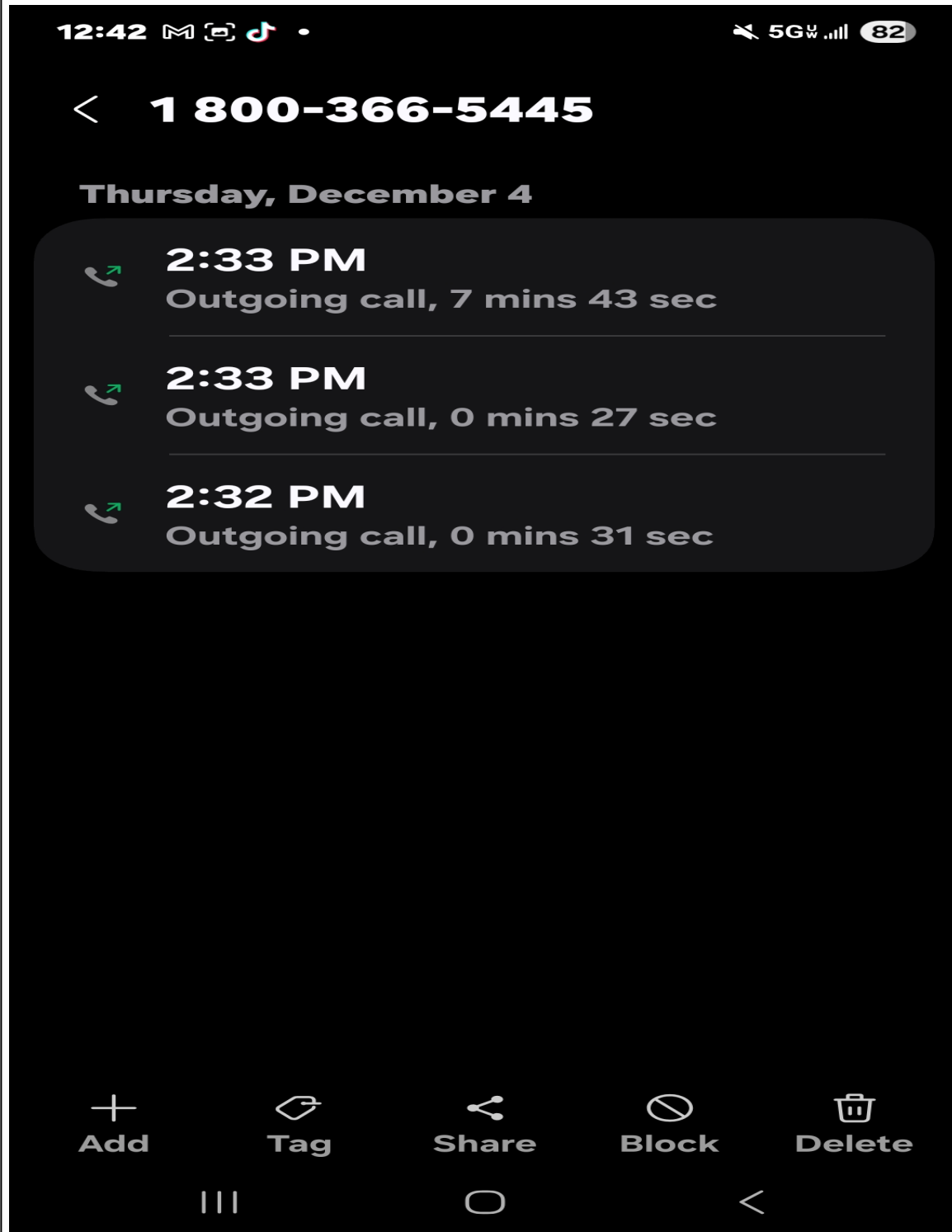
1 71. On December 2, 2025, KING AROGANT hand-delivered a copy of Fairchild's
2 December 9, 2025, public comment to County of Los Angeles board specialist Yancely Welch
3 and personally told her that something needed to be immediately done about individuals
4 constantly blocking the handicap ramp Fairchild used to enter the second-floor entrance of the
5 Stanley Mosk Superior Court by showing her a photograph of individuals blocking the handicap
6 ramp which was seen by Ms. Welch in Fairchild's December 9, 2025 written public comment.
7

8 72. On December 4, 2025, at approximately 11:00 AM, Fairchild, while being assisted by
9 KING AROGANT, contacted Defendant Jose Flores by dialing (213) 249-9999. Fairchild told
10 Defendant Flores that several of his employees were standing and blocking the handicap ramp
11 she used to reach the second-floor entrance of the Stanley Mosk Courthouse. Fairchild's four-
12 minute telephone conversation gave Defendant Flores fair notice of the allegations alleged
13 herein, and he chose to do nothing. See now a true and correct copy of Fairchild's telephone
14 conversation with Defendant Jose Flores marked as: "**Exhibit 5**" and attached below and herein:
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Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE HED & AGAINST PRIVATE PARTY DEFENDANTS.

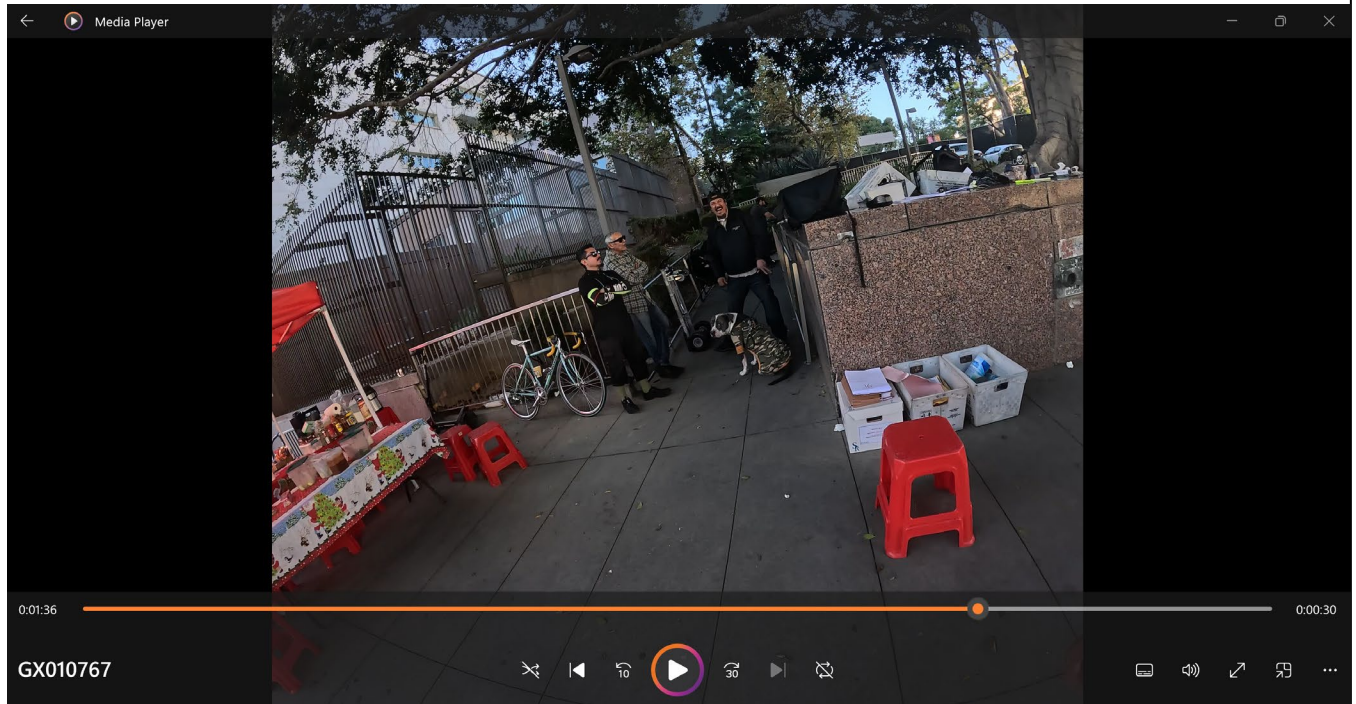
1 73. On December 4, 2025, at approximately 2:33 PM, Fairchild, while being assisted by
2 KING AROGANT, contacted Defendant Tatianna Simoes Silva by dialing 1.800.366.5445 and
3 asking to speak with the person in charge. Fairchild told Defendant Silva that several of her
4 employees were standing and blocking the handicap ramp she used to reach the second-floor
5 entrance of the Stanley Mosk Courthouse. Defendant Silva, while admitting that her employees
6 were blocking the handicap ramp in front of the Stanley Mosk Courthouse, told Fairchild that
7 her employees working outside the Stanley Mosk Courthouse were 1099 employees and that
8 neither she nor her company, Rapid Legal, was legally responsible for them. Fairchild's seven-
9 minute telephone conversation gave Defendant Silva fair notice of the allegations alleged herein,
10 and she chose to do nothing. See now a true and correct copy of Fairchild's telephone
11 conversation with Defendant Silva marked as: "**Exhibit 6**" and attached below and herein:



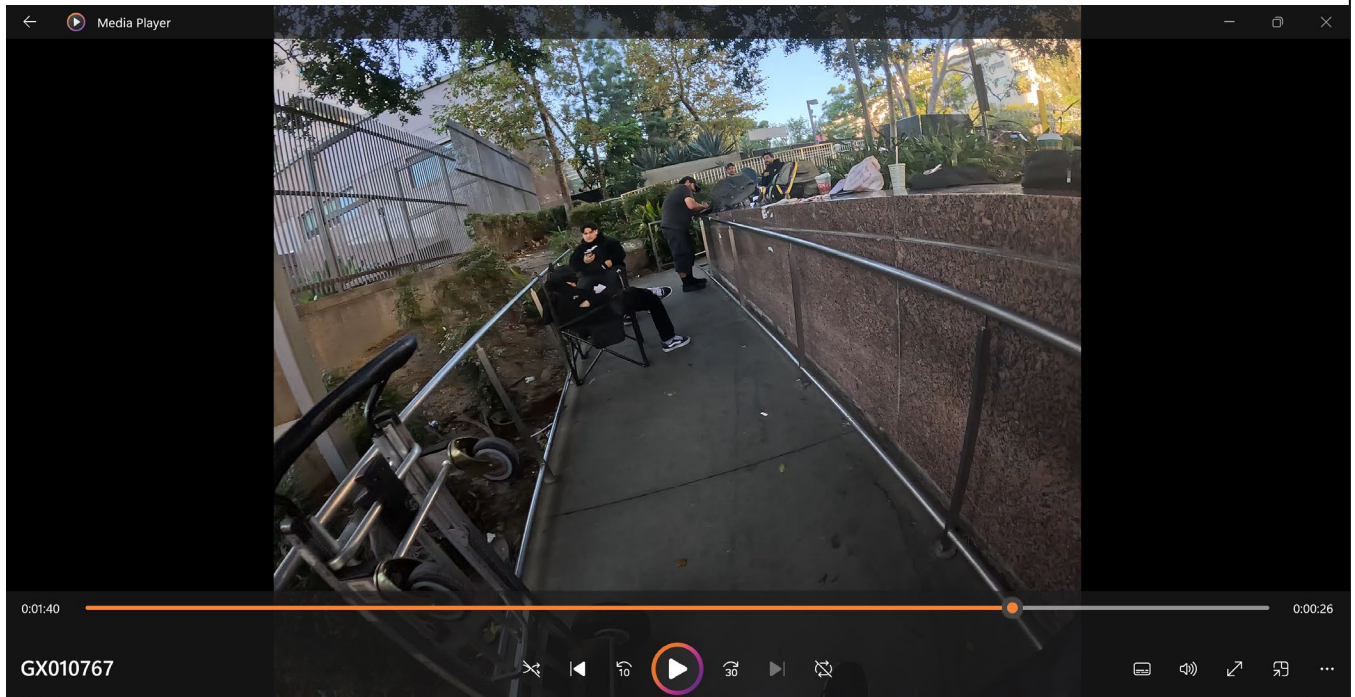
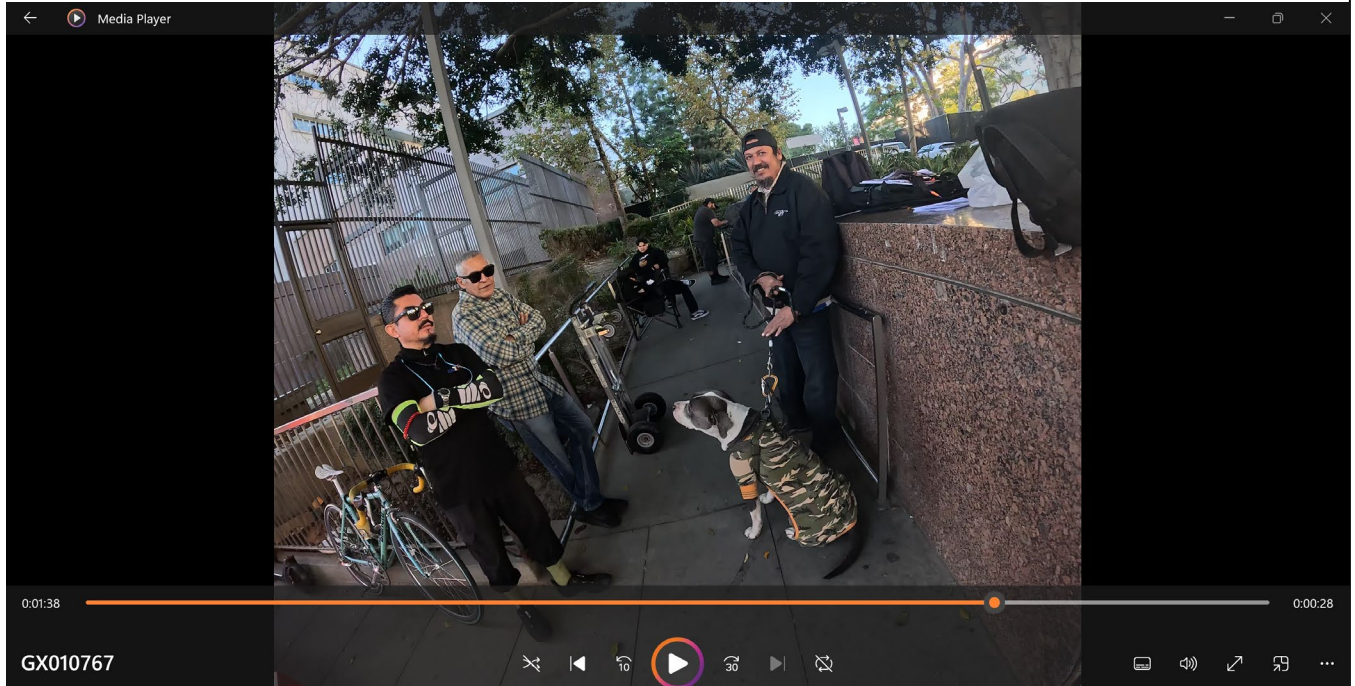
Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE HED & AGAINST PRIVATE PARTY DEFENDANTS.

74. On December 5, 2025, KING AROGANT left his home and travelled to the Stanley Mosk Superior Court by train. At approximately 3:00 PM, KING AROGANT arrived at the Stanley Mosk Courthouse's outside handicap ramp so that he could film for evidence individuals who were willfully, knowingly, cruelly, wantonly, carelessly, recklessly, fraudulently, deliberately, and callously blocking Fairchild from using the handicap ramp to safely arrive at the courthouse's second-floor entrance. When KING AROGANT entered this handicap ramp, he eye-witnessed numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over, and otherwise illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp. KING AROGANT himself had difficulty walking on the ramp as individuals were blocking the front entrance of the ADA ramp by standing on its guardrails and blocking it with themselves and a dog. On December 5, 2025, KING AROGANT also observed that these individuals had recklessly placed a large pink metal chair on the ramp to further discourage handicapped individuals from using it at all. It would have been impossible for Fairchild to safely pass through the ADA ramp, given the numerous individuals and chairs standing or seated on it. KING AROGANT told those individuals blocking the ramp that they could not be on the ramp and that his fiancée, Alison Helen Fairchild, had been trying to enter the handicap ramp, but they were all blocking it. KING AROGANT could smell marijuana and crystal methamphetamine coming from the individuals who were blocking the handicap ramp Fairchild needed to use to safely arrive at the second-floor entrance of the Stanley Mosk Superior Court. The individual with the dog who was standing near the entrance of the handicap ramp, while physically blocking it, looked very intimidating and would scare any disabled lady trying to enter it. On information and belief, the individuals illegally occupying, trespassing, and willfully, recklessly, maliciously, carelessly, knowingly, deliberately, and callously blocking this entrance of this handicap ramp on December 5, 2025, were employed by Defendants Silva, Flores, Rapid Legal, Nationwide Legal, and One Legal. See now *Exhibit 7*, a true and correct

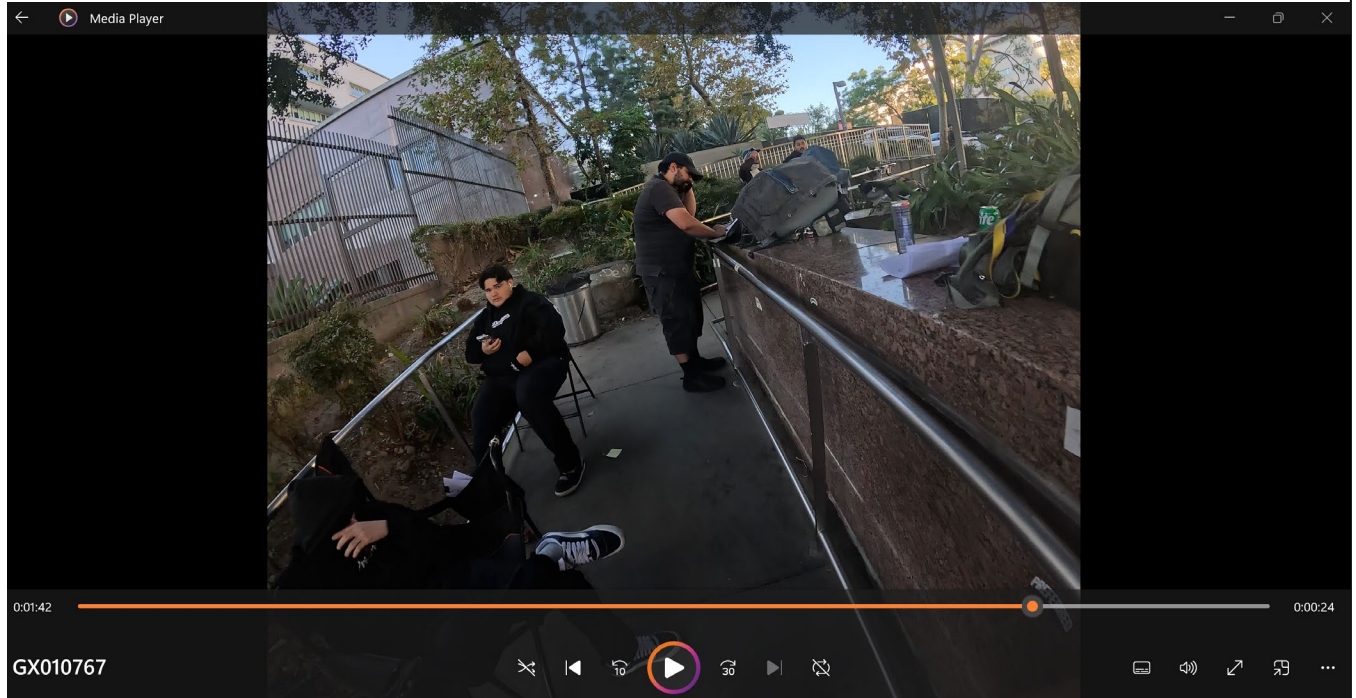
copy of several images taken from KING AROGANT'S GoPro camera's GX010767 video recording that proves by clear and convincing evidence that several individuals are constantly illegally occupying a handicap ramp they had no business being on in the first place, attached hereto and below:



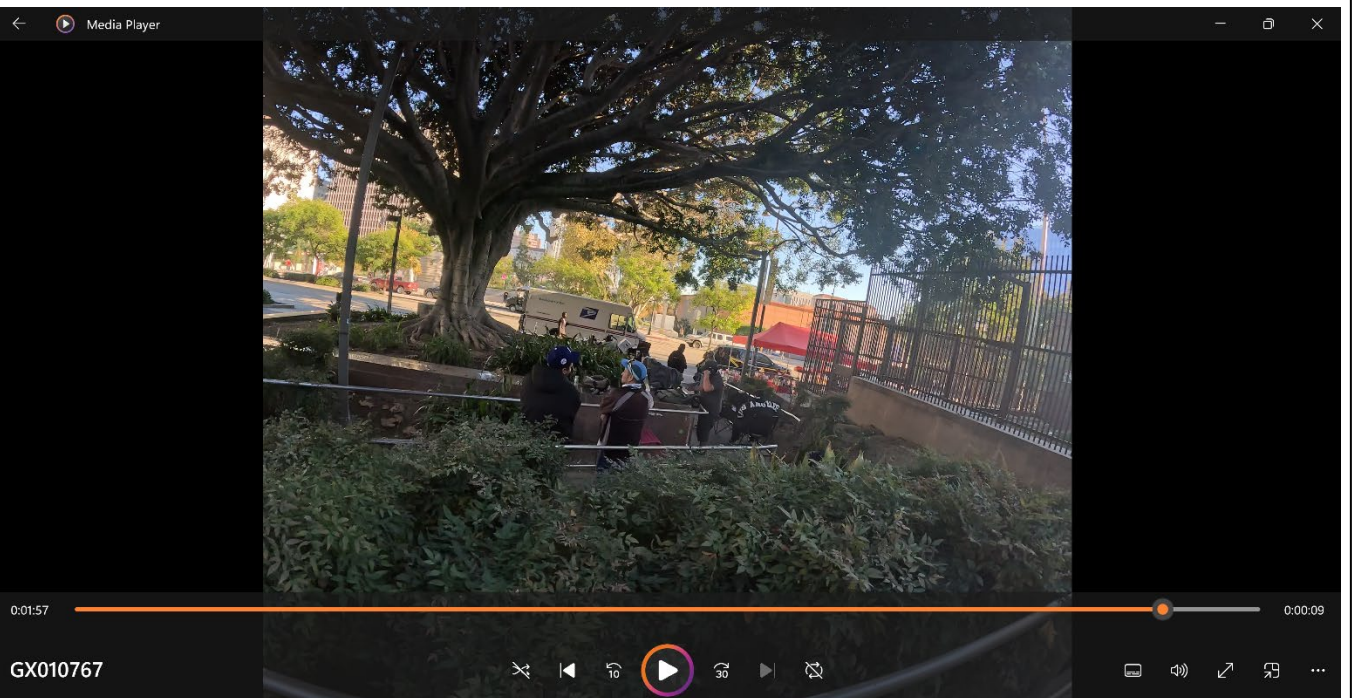
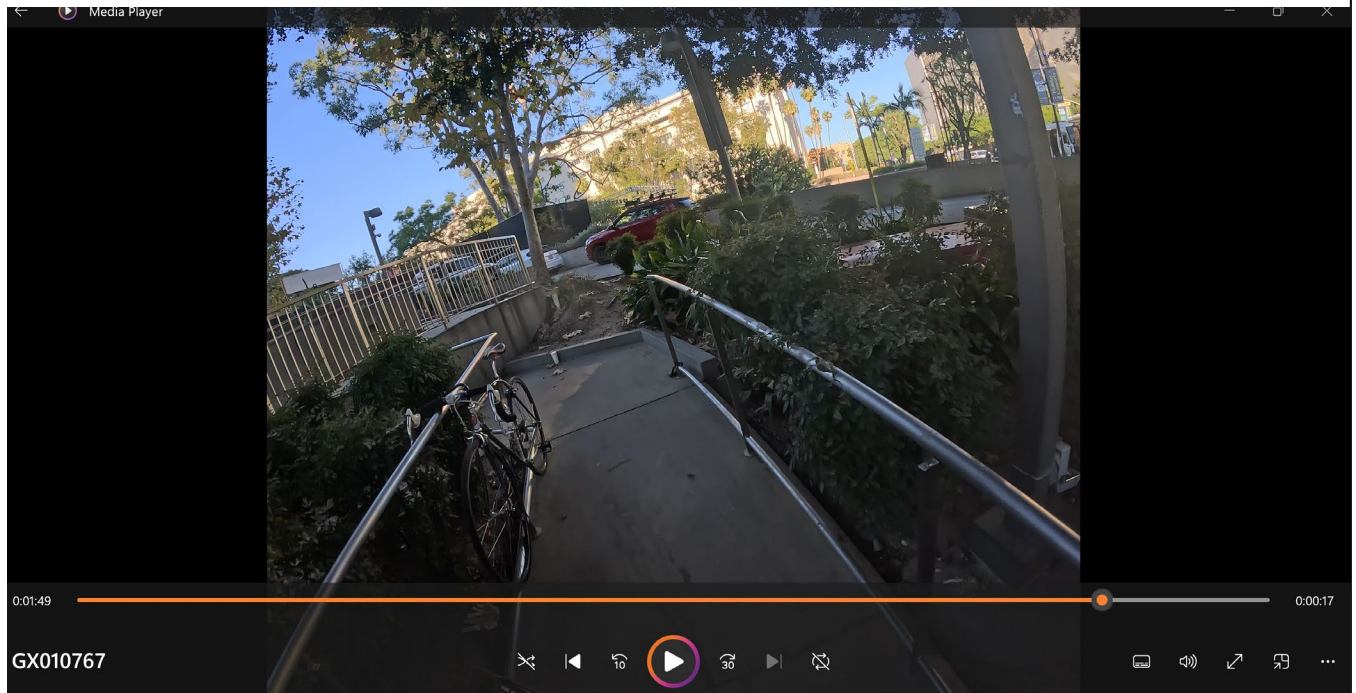
Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE HED & AGAINST PRIVATE PARTY DEFENDANTS.



Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE IIED & AGAINST PRIVATE PARTY DEFENDANTS.



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Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE IIED & AGAINST PRIVATE PARTY DEFENDANTS.

See now attached hereto a true and correct copy of KING AROGANT'S December 5, 2025, GoPro video recording's YouTube weblink below and herein:

https://youtu.be/chU0wU4_UyE

75. On December 5, 2025, KING AROGANT hand-delivered a copy of Fairchild's December 9, 2025, public comment to County of Los Angeles Office of County Counsel executive assistant Mayra Gomez, which was personally served on Defendant Shawn Kehoe simultaneously with a copy of Fairchild's summons and complaint in case **2:25-cv-06204-RAO**. Included in Fairchild's written public comment personally served upon Defendant Shawn Kehoe was an image taken from KING AROGANT'S GoPro camera that depicted and displayed several individuals physically blocking the entrance to the ADA handicap ramp Fairchild needed to use to safely arrive at the Stanley Mosk Courthouse's second floor entrance. Fairchild's numerous board meeting appearances and her December 9, 2025, public comment served upon Defendant Kehoe gave Defendant fair notice of the allegations alleged herein, and he chose to do nothing.

76. On December 9, 2025, Fairchild submitted a public comment to all five County of Los Angeles board of supervisors (including Defendants Mitchell and Solis), warning them of legal action if they continued to allow employees of legal processing companies to block her access on the Stanley Mosk Superior Court. In her written public comment made part of the December 9, 2025, public board meeting, Fairchild stated the following:

On the early morning of November 17, 2025, KING AROGANT was present at the handicap ramp complained upon to this ridiculous board of supervisors panel. KING AROGANT took photographs and video recordings that proved by clear and convincing

1 *evidence that County of Los Angeles continues to willfully, recklessly, wantonly, maliciously,*
2 *deliberately, knowingly, carelessly, negligently, and callously allow individuals to loiter,*
3 *solicit, obstruct, block, and solicit on the outside of the Stanley Superior Court's handicap*
4 *ramp. See evidence below:*

5
6 *A copy of Fairchild's December 9, 2025, public comment was electronically served*
7 *upon Holly J. Mitchell (hollyjmitchell@bos.lacounty.gov and Hilda Lucia Solis*
8 *(firstdistrict@bos.lacounty.gov)*

9
10
11 77. On December 16, 2025, Fairchild submitted a public comment to all five County of Los
12 Angeles board of supervisors (including Defendants Mitchell and Solis), warning them of legal
13 action if they continued to allow employees of legal processing companies to block her access
14 on the Stanley Mosk Superior Court. In her written public comment made part of the December
15 9, 2025, public board meeting, Fairchild stated the following:

16
17 *On the early morning of November 17, 2025, KING AROGANT was present at the*
18 *handicap ramp complained upon to this ridiculous board of supervisors panel. KING*
19 *AROGANT took photographs and video recordings that proved by clear and convincing*
20 *evidence that County of Los Angeles continues to willfully, recklessly, wantonly, maliciously,*
21 *deliberately, knowingly, carelessly, negligently, and callously allow individuals to loiter,*
22 *solicit, obstruct, block, and solicit on the outside of the Stanley Superior Court's handicap*
23 *ramp. See evidence below:*

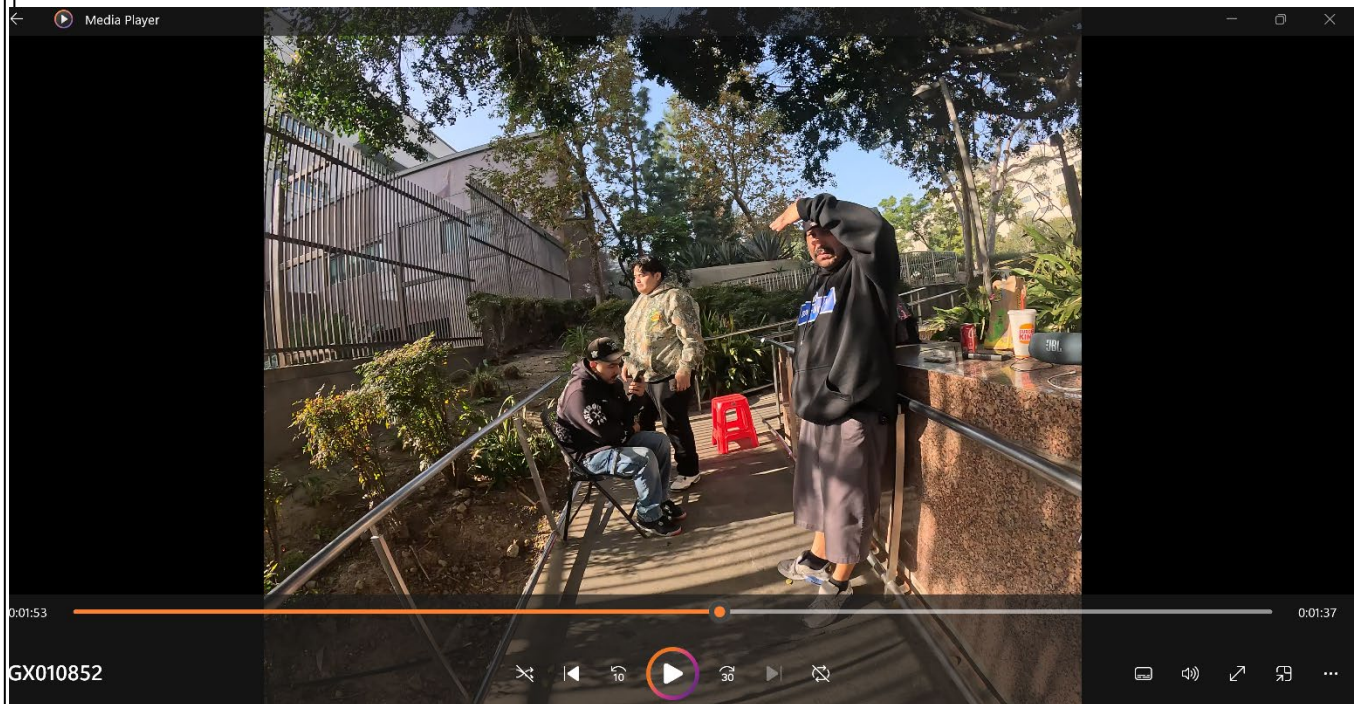
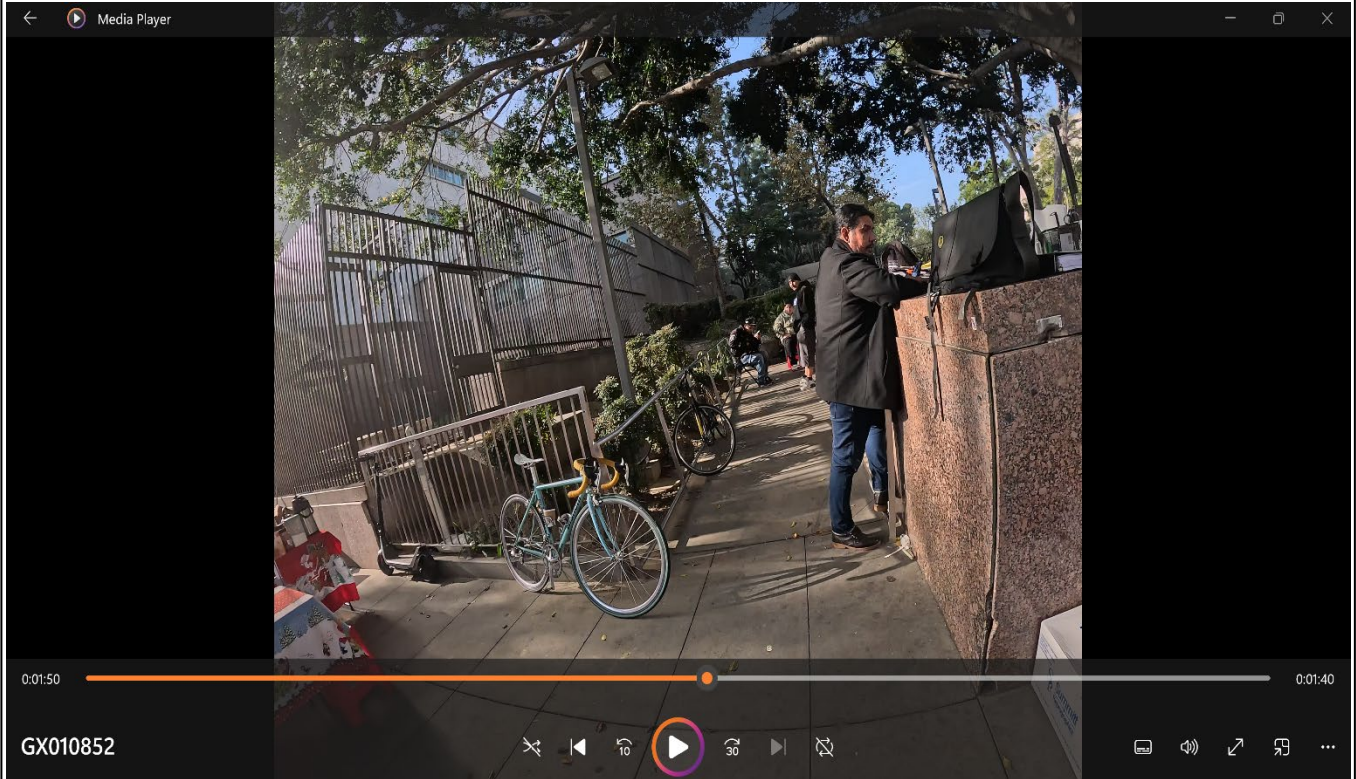
24
25 *A copy of Fairchild's December 16, 2025, public comment was electronically served*
26 *upon Holly J. Mitchell (hollyjmitchell@bos.lacounty.gov and Hilda Lucia Solis*
27 *(firstdistrict@bos.lacounty.gov)*

1 78. On December 17, 2025, KING AROGANT left his home and travelled to the Stanley
2 Mosk Superior Court by train. At approximately 2:00 PM, KING AROGANT arrived at the
3 Stanley Mosk Courthouse's outside handicap ramp so that he could film for evidence
4 individuals who were willfully, knowingly, cruelly, wantonly, carelessly, recklessly,
5 fraudulently, deliberately, and callously blocking Fairchild from using the handicap ramp to
6 safely arrive at the courthouse's second-floor entrance. When KING AROGANT entered this
7 handicap ramp, he eye-witnessed numerous human beings leaning on, standing on, putting a
8 chair on, hijacking, taking over, and otherwise illegally occupying, trespassing, loitering,
9 soliciting, and controlling this Stanley Mosk Courthouse handicap ramp. KING AROGANT
10 himself had difficulty walking on the ramp as individuals were blocking the front entrance of the
11 ADA ramp by standing on its guardrails and physically blocking the ADA handicap ramp's
12 entrance. On December 17, 2025, KING AROGANT also observed that these individuals had
13 recklessly placed a small plastic red chair on the ramp to further discourage handicapped
14 individuals from using it at all. The ADA handicap ramp's guardrails were covered by illegally
15 parked bicycles of Nationwide, One Legal, and Rapid Legal employees. It would have been
16 impossible for Fairchild to safely pass through the ADA ramp, given the numerous individuals
17 and chairs standing or seated on it. KING AROGANT told those individuals blocking the ramp
18 that they could not be on the ramp and that his fiancée, Alison Helen Fairchild, had been trying
19 to enter the handicap ramp, but they were all blocking it. KING AROGANT could smell
20 marijuana and crystal methamphetamine coming from the individuals who were blocking the
21 handicap ramp Fairchild needed to use to safely arrive at the second-floor entrance of the
22 Stanley Mosk Superior Court. On information and belief, the individuals illegally occupying,
23 trespassing, and willfully, recklessly, cruelly, maliciously, carelessly, knowingly, deliberately,
24 and callously blocking this entrance of this handicap ramp on December 17, 2025, were
25 employed by Defendants Silva, Flores, Rapid Legal, Nationwide Legal, and One Legal. See now
26 *Exhibit 8*,

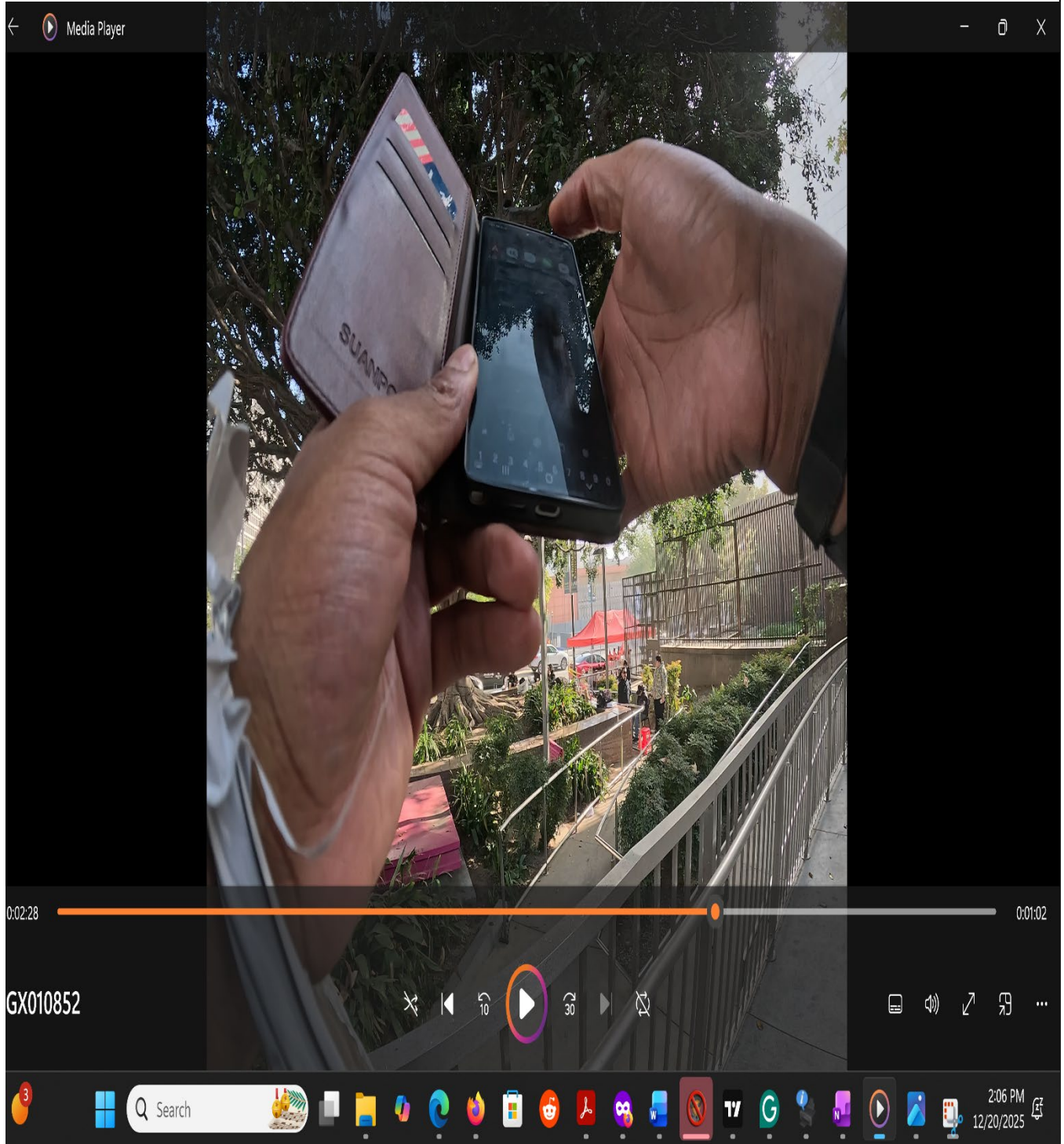
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Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE IIED & AGAINST PRIVATE PARTY DEFENDANTS.

1 a true and correct copy of several images taken from KING AROGANT'S GoPro camera's
2 GX010852 video recording that proves by clear and convincing evidence that several
3 individuals are constantly illegally occupying a handicap ramp they had no business being on in
4 the first place, attached hereto and below:



Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE IIED & AGAINST PRIVATE PARTY DEFENDANTS.



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See now attached hereto a true and correct copy of KING AROGANT'S December 17, 2025, GoPro video recording's YouTube weblink below and herein:

https://youtu.be/VNaqVTQkJFw?si=J77zPWRyheFN_YPH

79. On the afternoon of December 17, 2025, after arriving at the second-floor entrance of the Stanley Mosk Superior Court, KING AROGANT spoke to Defendant Gerardo Valdivia and requested his full name. Defendant Valdivia refused to give KING AROGANT his full name and then willfully, recklessly, maliciously, knowingly, cruelly, deliberately, fraudulently, and callously locked down the entire Stanley Mosk Superior Courthouse immediately and prevented any human beings inside from exiting or entering the courthouse on any of its three entrances on Hill Street (1st Floor entrance), Hill Street (2nd Floor entrance), and Grand Street (4th Floor entrance). Defendant Valdivia knew why KING AROGANT was requesting his full name after speaking with him on November 17, 2025. Defendant Valdivia received fair notice regarding the allegations alleged herein and throughout this civil rights complaint.

See now attached hereto a true and correct copy of KING AROGANT'S Defendant Valdivia December 17, 2025, GoPro video recording's YouTube weblink below and herein:

<https://youtu.be/mV2lbZuictA?si=4am0HucurPxvIO7b>

**XIV. PLAINTIFF ALISON HELEN FAIRCHILD’S REQUESTED FEDERAL CLAIMS
FOR RELIEF**

FIRST FEDERAL CAUSE OF ACTION

**Willful, Reckless, Wanton, Malicious, Careless, Cruel, Knowing, and Callous Violation
of 42 U.S.C. § 1983, Under Color of Law Due Process Clause Constitutional
Violations, Right to Due Process of Law, Right to Equal Protection, Fourteenth
Amendment; Against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay,
LASD Court Services Deputy Sheriff Valdivia, InfoTrack US, Inc., Nationwide Legal
LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles, &**

DOES 1-10

(Count 1-14)

80. Plaintiff Alison Helen Fairchild hereby restates, reincorporates, and realleges paragraphs 1-79 of this original constitutional civil rights complaint herein.

81. At all relevant times stated throughout this original constitutional civil rights complaint, Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 all acted under color of law by conspiring to recklessly violate Plaintiff Fairchild’s United States Fourteenth Amendment Due Process Clause constitutional rights, and then actually knowingly, carelessly, recklessly, wantonly, maliciously, willfully, cruelly, deliberately, and callously violated Fairchild’s United States Fourteenth Amendment Due Process Clause constitutional rights under color of law pursuant to 42 U.S.C. § 1983.

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE HED & AGAINST PRIVATE PARTY DEFENDANTS.

82. At all times stated herein and throughout this original constitutional civil rights complaint, Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia and DOES 1-10 recklessly violated the United States Constitution, and Fairchild's United States Fourteenth Amendment constitutional civil rights while they were all gainfully employed, while they were all acting under unconstitutional policies, practices, procedures, customs, and traditions of local California municipal corporation County of Los Angeles, and while they were all bathed, clothed, covered, and draped under and in the color of law.

83. Pursuant to Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia and DOES 1-10's willful, knowing, careless, cruel, reckless, wanton, malicious, deliberate and callous violations of the United States Constitution as alleged throughout this original civil rights complaint Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia and DOES 1-10 are not entitled to any shape, form, or type of judicial, electoral, or prosecutorial immunity.

84. "An Act to enforce the Provisions of the Fourteenth Amendment to the Constitution of the United States, and for other Purposes." 17 Stat. 13. Allegation of facts constituting a deprivation under color of state authority of a right guaranteed by the Fourteenth Amendment satisfies to that extent the requirement of R.S. § 1979.

85. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,

1 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
2 Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting,
3 acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair
4 on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting,
5 and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were
6 drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on
7 August 4, 2025 violated the United States Constitution and violated Fairchild's United States
8 Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional civil
9 rights. **(Count 1)**

10
11 86. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**
12 **Violation (Count 1)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
13 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
14 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
15 Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them
16 executing, by them directing, by them employing, by them manipulating, and otherwise
17 engaging in illusory and manipulated illegal acts of deceit, deception, conspiracies,
18 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
19 unconstitutional advantage over Plaintiff Alison Helen Fairchild.

20
21 87. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
22 transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,
23 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,
24 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
25 Silva, County of Los Angeles & DOES 1-10 allowing, tolerating,
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1 ratifying, permitting, acquiescing, and overlooking numerous human beings leaning on, standing
2 on, putting a chair on, hijacking, taking over and otherwise, illegally occupying, trespassing,
3 loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp while these
4 same individuals were drinking alcohol, smoking marijuana, and smoking crystal
5 methamphetamine in plain sight on August 12, 2025 violated the United States Constitution and
6 violated Fairchild's United States Fourteenth Amendment Due Process Clause and Equal
7 Protection Clause constitutional civil rights. **(Count 2)**

8
9 88. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**
10 **Violation (Count 2)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
11 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
12 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
13 Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them
14 executing, by them directing, by them employing, by them manipulating, and otherwise
15 engaging in illusory and manipulated illegal acts of deceit, deception, conspiracies,
16 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
17 unconstitutional advantage over Plaintiff Alison Helen Fairchild.

18
19 89. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
20 transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,
21 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,
22 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
23 Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting,
24 acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair
25 on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting,
26 and controlling this Stanley Mosk Courthouse handicap ramp while these
27
28

1 same individuals were drinking alcohol, smoking marijuana, and smoking crystal
2 methamphetamine in plain sight on August 27, 2025 violated the United States Constitution and
3 violated Fairchild's United States Fourteenth Amendment Due Process Clause and Equal
4 Protection Clause constitutional civil rights. **(Count 3)**

5
6 90. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**
7 **Violation (Count 3)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
8 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
9 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
10 Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them
11 executing, by them directing, by them employing, by them manipulating, and otherwise
12 engaging in illusory and manipulated illegal acts of deceit, deception, conspiracies,
13 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
14 unconstitutional advantage over Plaintiff Alison Helen Fairchild.

15
16 91. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
17 transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,
18 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,
19 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
20 Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting,
21 acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair
22 on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting,
23 and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were
24 drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on
25 September 5, 2025 violated the United States Constitution and violated Fairchild's United States
26 Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional civil
27 rights. **(Count 4)**

28

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE HED & AGAINST PRIVATE PARTY DEFENDANTS.

92. Which was reckless under color of law **Due Process Clause & Equal Protection Clause Violation (Count 4)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them executing, by them directing, by them employing, by them manipulating, and otherwise engaging in illusory and manipulated illegal acts of deceit, deception, conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over Plaintiff Alison Helen Fairchild.

93. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting, acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on September 15, 2025 violated the United States Constitution and violated Fairchild's United States Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional civil rights. **(Count 5)**

94. Which was reckless under color of law **Due Process Clause & Equal Protection Clause Violation (Count 5)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, LASD

1 Court Services Senior Deputy Sheriff Valdivia, InfoTrack US, Inc., Nationwide Legal LLC,
2 Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 by
3 them using, by them doing, by them executing, by them directing, by them employing, by them
4 manipulating, and otherwise engaging in illusory and manipulated illegal acts of deceit,
5 deception, conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful,
6 illegal, and unconstitutional advantage over Plaintiff Alison Helen Fairchild.

7
8 95. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
9 transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,
10 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,
11 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
12 Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting,
13 acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair
14 on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting,
15 and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were
16 drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on
17 September 24, 2025 violated the United States Constitution and violated Fairchild's United
18 States Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional
19 civil rights. **(Count 6)**

20
21 96. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**
22 **Violation (Count 6)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
23 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
24 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
25 Simoes-Silva, County of Los Angeles & DOES 1-10 by
26
27
28

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE IED & AGAINST PRIVATE PARTY DEFENDANTS.

1 them using, by them doing, by them executing, by them directing, by them employing, by them
2 manipulating, and otherwise engaging in illusory and manipulated illegal acts of deceit,
3 deception, conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful,
4 illegal, and unconstitutional advantage over Plaintiff Alison Helen Fairchild.

5
6 97. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
7 transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,
8 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,
9 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
10 Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting,
11 acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair
12 on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting,
13 and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were
14 drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on
15 October 13, 2025 violated the United States Constitution and violated Fairchild's United States
16 Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional civil
17 rights. **(Count 7)**

18
19 98. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**
20 **Violation (Count 7)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
21 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
22 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
23 Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them
24 executing, by them directing, by them employing, by them manipulating, and otherwise
25 engaging in illusory and manipulated illegal acts of deceit, deception, conspiracies,
26 concealment, fraud, and corruption to gain an unfair, unjust, unlawful,

27
28

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE IIED & AGAINST PRIVATE PARTY DEFENDANTS.

1 illegal, and unconstitutional advantage over Plaintiff Alison Helen Fairchild.

2
3 99. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
4 transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,
5 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,
6 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
7 Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting,
8 acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair
9 on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting,
10 and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were
11 drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on
12 October 29, 2025 violated the United States Constitution and violated Fairchild's United States
13 Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional civil
14 rights. **(Count 8)**

15
16 100. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**
17 **Violation (Count 8)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
18 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
19 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
20 Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them
21 executing, by them directing, by them employing, by them manipulating, and otherwise
22 engaging in illusory and manipulated illegal acts of deceit, deception, conspiracies,
23 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
24 unconstitutional advantage over Plaintiff Alison Helen Fairchild.

1 101. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
2 transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,
3 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,
4 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
5 Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting,
6 acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair
7 on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting,
8 and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were
9 drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on
10 November 4, 2025 violated the United States Constitution and violated Fairchild's United States
11 Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional civil
12 rights. **(Count 9)**

13
14 102. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**
15 **Violation (Count 9)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
16 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
17 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
18 Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them
19 executing, by them directing, by them employing, by them manipulating, and otherwise
20 engaging in illusory and manipulated illegal acts of deceit, deception, conspiracies,
21 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
22 unconstitutional advantage over Plaintiff Alison Helen Fairchild.

1 103. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
2 transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,
3 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,
4 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
5 Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting,
6 acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair
7 on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting,
8 and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were
9 drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on
10 November 10, 2025 violated the United States Constitution and violated Fairchild's United
11 States Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional
12 civil rights. **(Count 10)**

13
14 104. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**
15 **Violation (Count 10)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
16 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
17 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
18 Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them
19 executing, by them directing, by them employing, by them manipulating, and otherwise
20 engaging in illusory and manipulated illegal acts of deceit, deception, conspiracies,
21 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
22 unconstitutional advantage over Plaintiff Alison Helen Fairchild.

1 105. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
2 transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,
3 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,
4 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
5 Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting,
6 acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair
7 on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting,
8 and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were
9 drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on
10 November 17, 2025 violated the United States Constitution and violated Fairchild's United
11 States Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional
12 civil rights. **(Count 11)**

13
14 106. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**
15 **Violation (Count 11)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
16 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
17 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
18 Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them
19 executing, by them directing, by them employing, by them manipulating, and otherwise
20 engaging in illusory and manipulated illegal acts of deceit, deception, conspiracies,
21 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
22 unconstitutional advantage over Plaintiff Alison Helen Fairchild.

1 107. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
2 transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,
3 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,
4 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
5 Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting,
6 acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair
7 on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting,
8 and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were
9 drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on
10 December 2, 2025 violated the United States Constitution and violated Fairchild's United States
11 Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional civil
12 rights. **(Count 12)**

13
14 108. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**
15 **Violation (Count 12)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
16 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
17 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
18 Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them
19 executing, by them directing, by them employing, by them manipulating, and otherwise
20 engaging in illusory and manipulated illegal acts of deceit, deception, conspiracies,
21 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
22 unconstitutional advantage over Plaintiff Alison Helen Fairchild.

1 109. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and
2 transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,
3 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,
4 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
5 Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting,
6 acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair
7 on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting,
8 and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were
9 drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on
10 December 5, 2025 violated the United States Constitution and violated Fairchild's United States
11 Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional civil
12 rights. **(Count 13)**

13
14 110. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**
15 **Violation (Count 13)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
16 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
17 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
18 Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them
19 executing, by them directing, by them employing, by them manipulating, and otherwise
20 engaging in illusory and manipulated illegal acts of deceit, deception, conspiracies,
21 concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and
22 unconstitutional advantage over Plaintiff Alison Helen Fairchild.

111. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting, acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on December 17, 2025 violated the United States Constitution and violated Fairchild's United States Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional civil rights. **(Count 14)**

112. Which was reckless under color of law **Due Process Clause & Equal Protection Clause Violation (Count 14)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them executing, by them directing, by them employing, by them manipulating, and otherwise engaging in illusory and manipulated illegal acts of deceit, deception, conspiracies, concealment, fraud, and corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over Plaintiff Alison Helen Fairchild.

113. Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10'S reckless under color of law illegal acts alleged throughout this original constitution civil rights complaint in paragraphs 1-112 and alleged herein, were Due Process Clause constitutional violations (**Count 1-14**), were Equal Protection Clause constitutional violations (**Counts 1-14**), were a reckless violation of the United States Constitution, were a reckless violation of Fairchild's United States Fourteenth Amendment constitutional civil rights, and a violation of federal law.

114. As a further direct, foreseeable, and proximate result of said wrongful reckless, wanton, malicious, cruel, knowing, careless, willful, deliberate, and callous acts done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10. Plaintiff Fairchild has incurred attorney's fees in an amount to be determined, for which Plaintiff claims a sum to be established according to proof.

115. As alleged herein, Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 were guilty of oppression and fraud. Plaintiff Fairchild should recover, in addition to actual damages, exemplary and punitive damages to make an example of and to punish Defendants in an amount according to proof.

116. As a direct and proximate result of the negligence, recklessness, gross negligence, willfulness, and wantonness as aforesaid done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10, Plaintiff Fairchild sustained injuries and damages, including, without limitation, embarrassment, humiliation, anxiety, depression, a complete disruption of life, physical pain and suffering, emotional pain and suffering, deprivation of civil rights, insomnia, chest pain, inconvenience, heart palpitations, frustration, and mental anguish.

117. Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 are liable to Plaintiff Fairchild for actual and punitive damages given their negligence, recklessness, gross negligence, criminal indifference to civil obligations, and wantonness.

118. **WHEREFORE**, Plaintiff Alison Helen Fairchild demands judgment against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-100 on the first federal claim for relief of Plaintiff Alison Helen Fairchild's original civil rights complaint in the amount that will justly compensate Plaintiff for her compensatory, general, and special damages, together with costs and attorney's fees in this action.

SECOND FEDERAL CAUSE OF ACTION

Willful, Reckless, Wanton, Malicious, Careless, Cruel, Knowing, and Callous Violation of 42 U.S.C. § 1983, Under Color of Law Negligence Per Se, Violation of Right to Due Process of Law, Violation of Right to Equal Protection of Law, Fourteenth Amendment; Against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, LASD Court Services Deputy Sheriff Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles, &

DOES 1-10

(Count 1-14)

119. Plaintiff Alison Helen Fairchild hereby restates, reincorporates, and realleges paragraphs 1-118 of this original constitutional civil rights complaint herein.

120. The involvement of a policeman, a state official, whether or not his actions were lawful or authorized, in the alleged conspiracy would plainly provide the state action needed to show a direct violation of petitioner's Fourteenth Amendment rights entitling her to relief under [§ 1983](#), and private persons involved in such a conspiracy are "acting under color" of law and can be liable under [§ 1983](#), *Adickes v. S.H. Kress Co.*, 398 U.S. 144, 90 S.Ct. 1598, 26 L.Ed.2d 142 (1970) at 152.

121. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 allowing, tolerating, ratifying, permitting, acquiescing, and overlooking numerous human beings leaning on, standing

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on, putting a chair on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on August 4, 2025, August 12, 2025, August 27, 2025, September 5, 2025, September 15, 2025, September 24, 2025, October 13, 2025, October 29, 2025, November 4, 2025, November 10, 2025, November 17, 2025, December 2, 2025, December 5, 2025, and December 16, 2025 violated the United States Constitution and violated Fairchild's United States Fourteenth Amendment Due Process Clause and Equal Protection Clause constitutional civil rights **(Count 1-14)**, were under color of law negligence per se because all Defendants' reckless illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and transgressions alleged in paragraphs 1-120 violated California Civil Code § 51, et seq (Unruh Civil Rights Act, California Civil Code §§ 54-55.33 (California Disabled Persons Act), 42 U.S.C. § 12101, et seq, 42 U.S.C. § 12203, & 42 U.S.C. § 12132 and any other applicable state and federal law while they were all recklessly bathed, clothed, draped, and covered in, of and under the color of law.

122. Which was reckless under color of law (42 U.S.C. § 1983) **NEGLIGENCE PER SE (Count 1-14)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them executing, by them directing, by them employing, by them manipulating, and otherwise engaging in illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, and corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over Plaintiff Alison Helen Fairchild.

123. Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 reckless under color of law illegal acts alleged throughout this original constitution civil rights complaint in paragraphs 1-122 and alleged herein, were under color of law Due Process Clause & Equal Protection Clause constitutional violations (**Count 1-14**), under color of law **NEGLIGENCE PER SE**, were a reckless violation of the United States Constitution, were a reckless violation of Fairchild's United States Fourteenth Amendment Due Process Clause & Equal Protection Clause constitutional civil rights, and a violation of federal law.

124. As a further direct, foreseeable, and proximate result of said wrongful reckless, wanton, malicious, cruel, knowing, careless, willful, deliberate, and callous acts done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10. Plaintiff Fairchild has incurred attorney's fees in an amount to be determined, for which Plaintiff claims a sum to be established according to proof.

125. As alleged herein, Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 were guilty of oppression and fraud. Plaintiff Fairchild should recover, in addition to actual damages, exemplary and punitive damages to make an example of and to punish Defendants in an amount according to proof.

126. As a direct and proximate result of the negligence, recklessness, gross negligence, willfulness, and wantonness as aforesaid done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10, Plaintiff Fairchild sustained injuries and damages, including, without limitation, embarrassment, humiliation, anxiety, depression, a complete disruption of life, physical pain and suffering, emotional pain and suffering, deprivation of civil rights, insomnia, chest pain, inconvenience, heart palpitations, frustration, and mental anguish.

127. Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 are liable to Plaintiff Fairchild for actual and punitive damages given their negligence, recklessness, gross negligence, criminal indifference to civil obligations, and wantonness.

128. **WHEREFORE**, Plaintiff Alison Helen Fairchild demands judgment against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 on the second federal claim for relief of Plaintiff Alison Helen Fairchild's original civil rights complaint in the amount that will justly compensate Plaintiff for her compensatory, general, and special damages, together with costs and attorney's fees in this action.

THIRD CAUSE OF ACTION

Violation of 42 U.S.C. § 1985 [Conspiracy to Violate Civil Rights]

Against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,

Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, LASD

Court Services Deputy Sheriff Valdivia, InfoTrack US, Inc., Nationwide Legal LLC,

Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles, & DOES

1-10

129. Plaintiff Alison Helen Fairchild hereby restates, reincorporates, and realleges paragraphs 1-128 of this original civil rights complaint herein.

130. Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 all agreed to violate Fairchild's United States constitutional Fourteenth Amendment rights, her ADA rights (Title II & III of the Americans with Disabilities Act of 1990), and her California Constitution Article I, § 7 rights under color of law by interfering with and depriving Plaintiff Alison Helen Fairchild of her constitutional civil rights.

131. 42 U.S.C. § 1985 provides a remedy in damages to anyone who is injured in his person or property or deprived of a federal right or privilege as a result of an act in furtherance of a conspiracy prohibited under any part of Section 1985, including clause one of Section 1985 (2).

See 42 U.S.C. §1985(3) (clause iii).

132. Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 had a meeting of minds to violate Fairchild's United States constitutional Fourteenth Amendment rights, her ADA rights (Title II & III of the Americans with Disabilities Act of 1990), and her California Constitution Article I, § 7 rights under color of law by interfering with and depriving Fairchild of her civil rights in furtherance of Defendants' conspiracy to use under color of Due Process Clause violations, under color of law Equal Protection Clause violations, and under color of law negligence per se to willfully, recklessly, wantonly, cruelly, knowingly, carelessly, deliberately, and callously allow, tolerate, ratify, permit, acquiesce, and overlook numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on August 4, 2025, August 12, 2025, August 27, 2025, September 5, 2025, September 15, 2025, September 24, 2025, October 13, 2025, October 29, 2025, November 4, 2025, November 10, 2025, November 17, 2025, December 2, 2025, December 5, 2025, and December 16, 2025

133. Plaintiff Alison Helen Fairchild has suffered numerous injuries and deprivation of her constitutional civil rights due to the under color of law 42 U.S.C. § 1985 violations and federal law violations by Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10.

134. That because of the foregoing, **ALISON HELEN FAIRCHILD** suffered physical and

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1 psychological injuries, traumatic stress, post-traumatic stress disorder, mental anguish,
2 economic damages, damage to reputation, shame, humiliation, and indignity. All said,
3 injuries may be permanent.

4
5 135. As a direct and proximate result of the negligence, recklessness, gross negligence,
6 willfulness, and wantonness as aforesaid by Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
7 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
8 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna
9 Simoes-Silva, County of Los Angeles & DOES 1-10 Plaintiff Alison Helen Fairchild sustained
10 injuries and damages including, without limitation, embarrassment, humiliation, anxiety,
11 depression, a complete disruption of life, physical pain and suffering, emotional pain and
12 suffering, multiple sclerosis relapses, multiple sclerosis hugs, insomnia, chest pain,
13 inconvenience, heart palpitations, frustration, and mental anguish.

14
15 136. **WHEREFORE**, pursuant to 42 U.S.C. § 1985, Plaintiff Alison Helen Fairchild demands
16 actual damages, compensatory, general damages, and special damages against Hilda Lucia Solis,
17 Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-
18 Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC,
19 Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 on
20 the third federal claim for relief of Plaintiff Alison Helen Fairchild's original civil rights
21 complaint in the amount that will justly compensate Ms. Fairchild for her compensatory,
22 general, and special damages, together with costs and attorneys' fees in this action.

FOURTH CLAIM FOR RELIEF---CALIFORNIA STATE CAUSE OF ACTION---
GENERAL NEGLIGENCE--ALLEGED BY ALISON HELEN FAIRCHILD AS
AGAINST DEFENDANTS INFOTRACK US, INC., NATIONWIDE LEGAL LLC,
RAPID LEGAL INC., JOSE FLORES, TATIANNA SIMOES -SILVA, & DOES 1-10

137. Plaintiff Alison Helen Fairchild hereby restates, reincorporates, and realleges paragraphs 1-136 of this original civil rights complaint herein.

138. Defendants owed Plaintiff Fairchild a duty to act within reasonable and due care.

139. Defendants breached their duty to Plaintiff Fairchild as well as one or more of the duties established by 42 U.S.C. §§ 1983 & 1985, California Civil Code § 51, *et seq* (Unruh Civil Rights Act, California Civil Code §§ 54-55.33 (California Disabled Persons Act), 42 U.S.C. § 12101, *et seq*, 42 U.S.C. § 12203, 42 U.S.C. § 12132, Title II of the Americans with Disabilities Act of 1990, Title III of the Americans with Disabilities Act of 1990, the California Constitution, the United States Constitution and any other applicable state and federal law, and by committing and engaging in the actions, misdeeds, wrongdoings, misconduct, misbehavior, transgressions, violations, and misdoings alleged in paragraphs 1-138 of this original civil rights complaint.

140. InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, and DOES 10'S negligence complained of herein caused Plaintiff Fairchild to suffer serious harm, serious injuries, and significant damages.

141. Defendants' conduct was a substantial factor in causing Plaintiff Fairchild's harm.

1 142. As a proximate result of Defendants InfoTrack US, Inc., Nationwide Legal LLC, Rapid
2 Legal Inc., Jose Flores, Tatianna Simoes-Silva, and DOES 10'S negligence, Plaintiff Fairchild
3 has suffered general damages, compensatory damages, and special damages in amounts to be
4 determined at trial according to proof.

5
6 143. Plaintiff Fairchild is informed and believes and based on thereon alleges that, in
7 performing the acts alleged herein, Defendants acted with oppression, fraud, and malice, or,
8 alternatively, Defendants acted in such conscious disregard of Plaintiff's civil rights, safety,
9 welfare, and physical well-being, Plaintiff is entitled to punitive damages to punish Defendants
10 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
11 Silva, and DOES 10, and to deter such conduct in the future, in an amount to be determined at
12 trial.

13
14 144. **WHEREFORE**, Plaintiff Alison Helen Fairchild demands judgment against Defendants
15 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
16 Silva, and DOES 10 on the fourth claim for relief of Plaintiff Alison Helen Fairchild's original
17 constitutional civil rights complaint in the amount that will justly compensate Ms. Fairchild for
18 her compensatory, general, and special damages, together with costs and attorneys' fees in this
19 action.

FIFTH CLAIM FOR RELIEF---CALIFORNIA STATE CAUSE OF ACTION---
NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS--ALLEGED BY ALISON
HELEN FAIRCHILD AS AGAINST DEFENDANTS INFOTRACK US, INC.,
NATIONWIDE LEGAL LLC, RAPID LEGAL INC., JOSE FLORES, TATIANNA
SIMOES -SILVA, & DOES 1-10

145. Plaintiff Alison Helen Fairchild hereby restates, reincorporates, reiterates, realleges, and incorporates by reference previous paragraphs 1-144 of this original civil rights complaint herein.

146. Defendants InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, and DOES 10, by their conduct, actions, misdeeds, wrongdoings, misconduct, misbehavior, transgressions, violations, and misdoings complained and alleged in paragraphs 1-145 of this original civil rights complaint, negligently inflicted emotional distress upon Plaintiff Fairchild. Said conduct was intentional and malicious and done for the sole purpose of causing Plaintiff Fairchild to suffer humiliation, mental anguish, and emotional and physical distress.

147. Defendants InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, and DOES 10'S negligence proximately and actually caused Plaintiff Fairchild to suffer severe and ongoing personal injuries and great physical, mental, emotional and psychological pain and suffering, all to her general damages, compensatory damages, and special damages in amount to be proved according to proof.

1 148. Further, as a direct and legal result of the hereinabove alleged negligence of Defendants
2 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
3 Silva, and DOES 10, and the injuries caused thereby them all, Plaintiff Fairchild was forced to
4 incur and will continue to be forced to incur various medical costs, psychiatric costs, and
5 expenses as special damages in an amount to be determined at the time of jury trial.

6
7 149. Further, as a direct and legal result of the hereinabove alleged negligence of Defendants
8 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
9 Silva, and DOES 10, Plaintiff Fairchild has lost, and will continue to lose, her constitutional
10 civil rights, all to her special damages in amount to be determined at the time of trial herein.

11
12 150. As a further proximate result of Defendants InfoTrack US, Inc., Nationwide Legal LLC,
13 Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, and DOES 10'S actions and the
14 consequences proximately caused by it, as hereinabove alleged, Plaintiff Fairchild suffered
15 humiliation, mental anguish, and emotional and physical distress and has been injured in mind
16 and body as follows: damages in the sum to be determined at trial based on proof.

17
18 151. **WHEREFORE**, Plaintiff Alison Helen Fairchild demands judgment against InfoTrack
19 US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, and
20 DOES 10'S on the fifth claim for relief of Plaintiff Alison Helen Fairchild's original civil rights
21 complaint in the amount that will justly compensate Ms. Fairchild for her compensatory,
22 general, and special damages, together with costs and attorney's fees in this action.

SIXTH FEDERAL CAUSE OF ACTION

Declaratory Judgment [28 U.S.C. § 2201]

**Against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,
Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, LASD
Court Services Deputy Sheriff Valdivia, InfoTrack US, Inc., Nationwide Legal LLC,
Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles, & DOES**

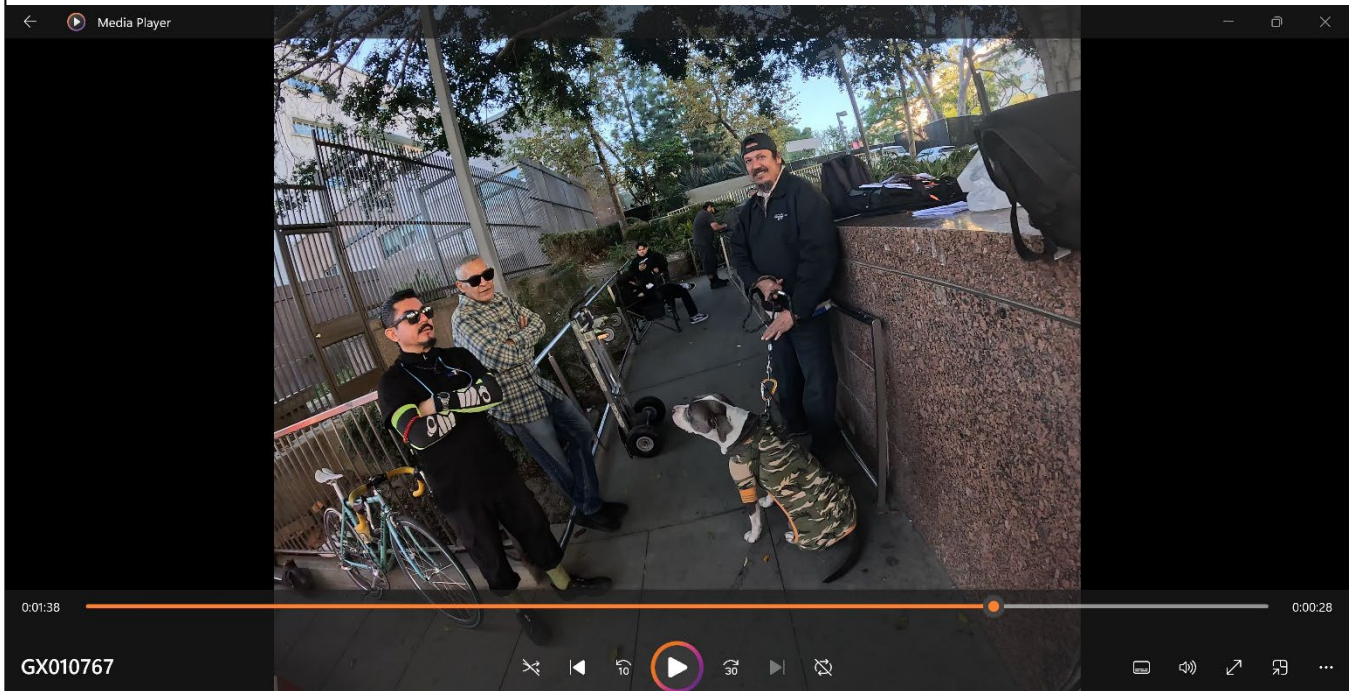
1-10

152. Plaintiff Alison Helen Fairchild hereby restates, reincorporates, reiterates, realleges, and incorporates by reference previous paragraphs 1-151 of this original civil rights complaint herein.

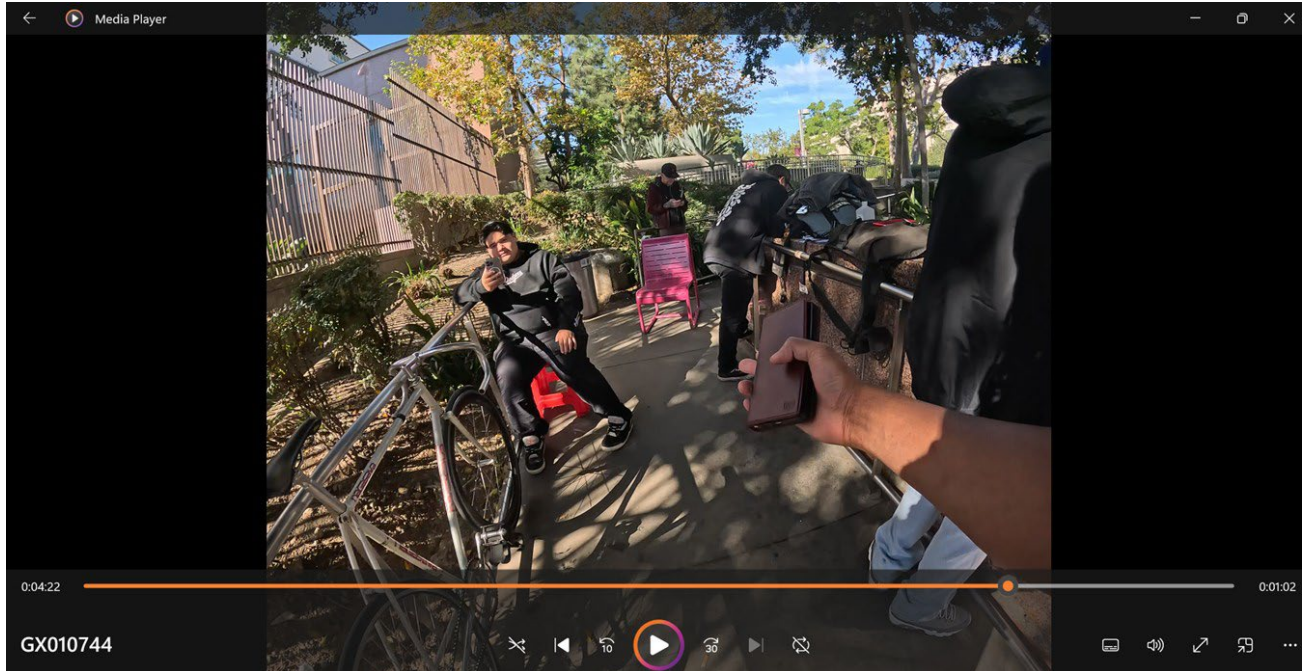
153. An actual and substantial controversy exists between Plaintiff Fairchild and Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 exist regarding the deliberate under color of law constitutional rights violations due wholly to the unclean hands of above stated Defendants using **UNDER COLOR OF LAW FRAUD NEGLIGENCE PER SE, UNDER COLOR OF LAW DUE PROCESS OF LAW CLAUSE VIOLATIONS, UNDER COLOR OF LAW EQUAL PROTECTIONS CLAUSE VIOLATIONS, VIOLATIONS OF CALIFORNIA DISABILITY STATUTES, VIOLATIONS OF TITLES II & III OF THE AMERICANS WITH DISABILITIES ACT OF 1990** to unlawfully, unconstitutionally, and illegally prevent Fairchild from using a ADA handicap ramp that is currently being illegally occupied, illegally taken over, illegally hijacked, illegally obstructed, and illegally blocked by individuals whom the Defendants know or should of known are regularly on a nearly minute basis preventing Fairchild and many other disabled

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persons from using and entering the ADA handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012.



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154. Plaintiff Fairchild has proven to this United States district court with an abundance of evidence of her constitutional civil rights to use and enter the ADA Stanely Mosk Courthouse handicap ramp, while Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 continue to conspire to violate Fairchild's civil rights by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 willfully, recklessly, wantonly, cruelly, knowingly, carelessly, deliberately, and callously allowing, tolerating, ratifying, permitting, acquiescing, and overlooking numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over and otherwise, illegally occupying,

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1 trespassing, loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp
2 while these same individuals were drinking alcohol, smoking marijuana, and smoking crystal
3 methamphetamine in plain sight on August 4, 2025, August 12, 2025, August 27, 2025,
4 September 5, 2025, September 15, 2025, September 24, 2025, October 13, 2025, October 29,
5 2025, November 4, 2025, November 10, 2025, November 17, 2025, December 2, 2025,
6 December 5, 2025, and December 16, 2025, in direct violation of 42 U.S.C. §§ 1983 & 1985,
7 California Civil Code § 51, *et seq* (Unruh Civil Rights Act, California Civil Code §§ 54-55.33
8 (California Disabled Persons Act), 42 U.S.C. § 12101, *et seq*, 42 U.S.C. § 12203, 42 U.S.C. §
9 12132, Title II of the Americans with Disabilities Act of 1990, Title III of the Americans with
10 Disabilities Act of 1990, the California Constitution, and the United States Constitution, and
11 while Defendants used **reckless UNDER COLOR OF LAW FRAUD NEGLIGENCE PER**
12 **SE, UNDER COLOR OF LAW DUE PROCESS OF LAW CLAUSE VIOLATIONS,**
13 **UNDER COLOR OF LAW EQUAL PROTECTIONS CLAUSE VIOLATIONS,**
14 **VIOLATIONS OF CALIFORNIA DISABILITY STATUTES, VIOLATIONS OF TITLES**
15 **II & III OF THE AMERICANS WITH DISABILITIES ACT OF 1990** to willfully,
16 recklessly, maliciously, cruelly, knowingly, fraudulently, deliberately, careless, and callously
17 deprive Fairchild of her constitutional civil rights by preventing her from entering a handicap
18 ramp created for her, while condoning and permitting individuals illegally obstructing, illegally
19 occupying, and illegally taking over a Stanley Mosk Superior Court handicap ramp that allowed
20 Fairchild to safely arrive at the courthouse's second floor entrance, in direct violation of 42
21 U.S.C. §§ 1983 & 1985, California Civil Code § 51, *et seq* (Unruh Civil Rights Act, California
22 Civil Code §§ 54-55.33 (California Disabled Persons Act), 42 U.S.C. § 12101, *et seq*, 42 U.S.C.
23 § 12203, 42 U.S.C. § 12132, Title II of the Americans with Disabilities Act of 1990, Title III of
24 the Americans with Disabilities Act of 1990, the California Constitution, and the United States
25 Constitution.

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155. An actual and substantial controversy exists between the parties concerning their substantial legal rights and duties. Plaintiff Fairchild contends that the Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 used reckless **UNDER COLOR OF LAW DUE PROCESS CLAUSE VIOLATIONS, UNDER COLOR OF LAW EQUAL PROTECTION CLAUSE VIOLATIONS, & UNDER COLOR OF LAW NEGLIGENCE PER SE** to interfere with her constitutional civil rights, and Plaintiff Alison Helen Fairchild, therefore, respectfully requests that this United States District Court issue a declaratory judgment to that effect. Thus, declaratory relief is appropriate under 28 U.S.C. § 2201 *et seq*

156. **WHEREFORE**, Plaintiff Alison Helen Fairchild demands judgment against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 on the seventh claim for relief of Plaintiff Alison Helen Fairchild's original civil rights complaint in the amount that will justly compensate Ms. Fairchild for her compensatory, general, and special damages, together with costs and attorneys' fees in this action.

**EIGHTH CLAIM FOR RELIEF-----VIOLATION OF THE CALIFORNIA UNRUH
CIVIL RIGHTS ACT, CALIFORNIA CIVIL CODE §§ 51 & 52--ALLEGED BY ALISON
HELEN FAIRCHILD AS AGAINST DEFENDANTS INFOTRACK US, INC.,
NATIONWIDE LEGAL LLC, RAPID LEGAL INC, JOSE FLORES, TATIANNA
SIMOES-SILVA & DOES 1-10**

157. Plaintiff Alison Helen Fairchild hereby restates, reincorporates, reiterates, realleges, and incorporates by reference previous paragraphs 1-156 of this original civil rights complaint herein.

158. The reckless and callous actions, misdeeds, wrongdoings, misconduct, misbehavior, transgressions, violations, and misdoings of InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva & DOES 1-10's employees alleged throughout this original civil rights complaint and complained of in paragraphs 1-157 violated the California Unruh Civil Rights Act by Defendants willfully, recklessly, wantonly, cruelly, knowingly, carelessly, deliberately, and callously allowing, tolerating, ratifying, permitting, acquiescing, and overlooking numerous of their employees leaning on, standing on, putting a chair on, hijacking, taking over and otherwise, illegally occupying, trespassing, loitering, soliciting, and controlling the Stanley Mosk Courthouse handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012, while these same individuals were drinking alcohol, smoking marijuana, and smoking crystal methamphetamine in plain sight on August 4, 2025, August 12, 2025, August 27, 2025, September 5, 2025, September 15, 2025, September 24, 2025, October 13, 2025, October 29, 2025, November 4, 2025, November 10, 2025, November 17, 2025, December 2, 2025, December 5, 2025, and December 16, 2025.

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE IED & AGAINST PRIVATE PARTY DEFENDANTS.

1 159. The reckless and callous actions, misdeeds, wrongdoings, misconduct, misbehavior,
2 transgressions, violations, and misdoings of InfoTrack US, Inc., Nationwide Legal LLC, Rapid
3 Legal Inc., Jose Flores, Tatianna Simoes-Silva, & DOES 1-10's employees alleged throughout
4 this original civil rights complaint and complained of in paragraphs 1-157 violated the
5 California Unruh Civil Rights Act by Defendants and Defendants' employees recklessly
6 denying Fairchild equal access and use of an ADA handicap ramp located at 111 North Hill
7 Street, Los Angeles, CA 90012. Defendants used **reckless UNDER COLOR OF LAW**
8 **FRAUD NEGLIGENCE PER SE, UNDER COLOR OF LAW DUE PROCESS OF LAW**
9 **CLAUSE VIOLATIONS, UNDER COLOR OF LAW EQUAL PROTECTIONS CLAUSE**
10 **VIOLATIONS, VIOLATIONS OF CALIFORNIA DISABILITY STATUTES,**
11 **VIOLATIONS OF TITLES II & III OF THE AMERICANS WITH DISABILITIES ACT**
12 **OF 1990** that was spearheaded, masterminded, and orchestrated by InfoTrack US, Inc.,
13 Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, & DOES 1-10
14 working closely with County of Los Angeles peace officers and employees to create an illegal
15 operation on the ADA handicap ramp that padded the pockets of Defendants InfoTrack US, Inc.,
16 Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, & DOES 1-10
17 and their under color of law County of Los Angeles co-conspirators.

18
19 160. The California Unruh Civil Rights Act provides for declaratory and monetary relief to
20 "aggrieved persons" who suffer from discrimination based on their disability, including in
21 housing and public accommodations, as outlined and stated throughout this original civil rights
22 complaint.
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Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages
for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42
U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA
TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE HED & AGAINST PRIVATE PARTY DEFENDANTS.

1 161. Plaintiff Alison Helen Fairchild has been damaged by Defendants InfoTrack US, Inc.,
2 Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, & DOES 1-10'S
3 willful, reckless, knowing, cruel, wanton, malicious, evil, careless, and callous under color of
4 law non-compliance with the California Unruh Civil Rights Act.

5
6 162. Pursuant to California Civil Code § 52, Plaintiff Alison Helen Fairchild is entitled to such
7 other relief as this Court considers appropriate, including monetary damages in an amount to be
8 proven at trial, but in no event less than \$ 4,000.

9
10 163. Pursuant to the Unruh Civil Rights Act, Plaintiff Fairchild is entitled to attorney's fees
11 and costs in an amount to be proven at trial.

12
13 164. **WHEREFORE**, Plaintiff Alison Helen Fairchild demands judgment against Defendants
14 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
15 Silva, & DOES 1-10 on the eighth claim for relief of Plaintiff Alison Helen Fairchild's original
16 civil rights complaint in the amount that will justly compensate Ms. Fairchild for her
17 compensatory, general, and special damages, together with costs and attorney's fees in this
18 action.

NINTH CLAIM FOR RELIEF-----VIOLATION OF 42 U.S.C. § 1983 UNDER COLOR OF LAW CALLOUS DELIBERATE INDIFFERENCE [MONELL POLICY CLAIM]—AS ALLEGED BY ALISON HELEN FAIRCHILD AS AGAINST DEFENDANT COUNTY OF LOS ANGELES

165. Plaintiff Alison Helen Fairchild hereby restates, reincorporates, reiterates, realleges, and incorporates by reference previous paragraphs 1-164 of this original civil rights complaint herein.

166. The reckless and callous illegal acts, illegal actions, misdeeds, wrongdoings, misconduct, misbehavior, transgressions, violations, and misdoings of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham (Nicole Amber Davis-Tinkham and her co-conspirators), Francisco Garibay (Defendant has an extremely close work relationship with Defendants Tinkham, Solis & Mitchell), and Gerardo Valdivia (peace officer in charge of day to day operations of the Superior of California, County of Los Angeles, Stanley Mosk Superior Court) as alleged throughout this original constitutional civil rights complaint (**paragraphs 1-165**) were done pursuant to one or more interrelated policies, rules, practices, and/or customs of the Defendant County of Los Angeles, its County of Los Angeles Sheriff's Department, its County of Los Angeles Office of County Counsel, its Superior of California, its County of Los Angeles Operations of thirty-six courthouses (Deni K. Butler), and its County of Los Angeles Executive Office and Board of Supervisors.

167. At all times material and relevant to this original civil rights complaint, Defendant County of Los Angeles, and its County of Los Angeles Sheriff's Department, its County of Los Angeles Office of County Counsel, its Superior Court of California, County of Los Angeles Operations of thirty-six courthouses, and its County of Los Angeles Executive Office and Board

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1 of Supervisors had interrelated *de facto* policies, practices, procedures, rules, traditions, and
2 customs which included, inter alia: (1) County of Los Angeles employees and peace officers
3 willfully, recklessly, wantonly, cruelly, knowingly, carelessly, deliberately, and callously
4 allowing, tolerating, ratifying, permitting, acquiescing, and overlooking numerous groups of
5 individuals that were leaning on, standing on, putting a chair on, hijacking, taking over and
6 otherwise, illegally occupying, trespassing, loitering, soliciting, and controlling the Stanley
7 Mosk Courthouse handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012,
8 while these same individuals were drinking alcohol, smoking marijuana, and smoking crystal
9 methamphetamine in plain sight on August 4, 2025, August 12, 2025, August 27, 2025,
10 September 5, 2025, September 15, 2025, September 24, 2025, October 13, 2025, October 29,
11 2025, November 4, 2025, November 10, 2025, November 17, 2025, December 2, 2025,
12 December 5, 2025, and December 16, 2025; (2) Recklessly allowing County of Los Angeles
13 peace officers, and recklessly allowing County of Los Angeles employees to continue to
14 condone, tolerate, and ratify individuals who recklessly violate California Civil Code § 51, *et*
15 *seq* (Unruh Civil Rights Act, California Civil Code §§ 54-55.33 (California Disabled Persons
16 Act), 42 U.S.C. § 12132 *et seq*, 42 U.S.C. § 12203, Title II of the Americans with Disabilities
17 Act of 1990, the California Constitution, and the United States Constitution on a nearly hourly
18 basis by physically blocking the handicap ramp itself and the handicap ramp's exit and entrance;
19 (3) Recklessly allowing its County of Los Angeles Board of Supervisors to ignore Plaintiff
20 Fairchild's request for assistance and demand that an investigation be launched after she had
21 appeared through her written public comment at Board of Supervisors public meetings on
22 November 4, 2025, November 18, 2025, December 2, 2025, December 9, 2025, and December
23 16, 2025; and (4) a failure to adequately hire, train, intervene, discipline, supervise, monitor,
24 counsel and control its County of Angles Office of County Counsel employees, Sheriff Robert
25 G. Luna and all his Assistant Sheriffs and Commanders, County of Los Angeles Sheriff's
26 Department peace officers, County of Los Angeles Superior Court employees, and County of

27
28

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Los Angeles Board of Supervisors, including but not limited to Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia & DOES 1-10.

168. The County of Los Angeles's policies, practices, procedures, traditions, rules, and customs of encouraging, condoning, consenting to, approving, and tolerating its peace officers, Sheriff, County of Los Angeles Superior Court employees, and County of Los Angeles Board of Supervisors to fail to investigate unconstitutional actions of its peace officers and employees and execution of under color of law reckless violations of California Civil Code § 51, *et seq* (Unruh Civil Rights Act, California Civil Code §§ 54-55.33 (California Disabled Persons Act), 42 U.S.C. § 12132 *et seq*, 42 U.S.C. § 12203, Title II of the Americans with Disabilities Act of 1990, the California Constitution, and the United States Constitution. Accordingly, the County of Los Angeles prioritizes and values its own policies, practices, procedures, traditions, rules, and customs over the United States' Fourteenth Amendment Due Process Clause constitutional civil rights and Title II of the Americans with Disabilities Act of 1990 constitutional civil rights of United States citizens who are wrongfully mistreated and discriminated against on public property owned by the County of Los Angeles.

169. These illegal, illicit, unlawful, unconstitutional, cruel, fraudulent, deceitful, and incompetent County of Los Angeles policies, practices, procedures, rules, traditions, and customs encouraged the above County of Los Angeles misconduct and was both separately and together, the moving force and a direct and proximate cause of the unconstitutional acts committed by Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia & DOES 1-10, and the injuries and damages sustained by Plaintiff Alison Helen Fairchild.

170. These illegal, illicit, unlawful, unconstitutional, fraudulent, cruel, deceitful, insensitive, indifferent, and incompetent County of Los Angeles policies, practices, procedures, traditions, and customs encouraged the above County of Angeles Office of County Counsel, Sheriff Robert G. Luna and all his Assistant Sheriffs and Commanders, County of Los Angeles Sheriff's Department peace officers, County of Los Angeles Superior Court employees and County of Los Angeles Board of Supervisors' misconduct and was both separately and together, the moving force and a direct and proximate cause of the unconstitutional acts committed by Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia & DOES 1-10, and the injuries and damages sustained by Plaintiff Alison Helen Fairchild.

171. The County of Los Angeles can reasonably be said to have policies, practices, procedures, traditions, rules, and customs encouraged by the above misconduct of County of Angeles Office of County Counsel, Sheriff Robert G. Luna and all his Assistant Sheriffs and Commanders, County of Los Angeles Sheriff's Department peace officers, County of Los Angeles Superior Court employees and County of Los Angeles Board of Supervisors' employees (such as head board specialist Francisco Garibay); and encouraged by the County of Los Angeles Board of Supervisors and County of Los Angeles Executive Office's misconduct that has been alleged to have occurred between August 1, 2025 and December 17, 2025, only.

172. **WHEREFORE**, pursuant to 42 U.S.C. § 1983, Plaintiff Alison Helen Fairchild demands actual or compensatory damages against Defendant County of Los Angeles plus the costs of this action, attorneys' fees, and such other and further relief that the Court deems just and proper.

XV. REQUEST FOR INJUNCTIVE RELIEF


173. Plaintiff Alison Helen Fairchild hereby restates, reincorporates, reiterates, realleges, and incorporates by reference previous paragraphs 1-172 of this original civil rights complaint herein.

174. 42 U.S.C. § 1983, 42 U.S.C. 1985, and the Fourteenth Amendment of the United States Constitution authorizes this Court to issue a permanent injunction against Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 for their reckless violations of 42 U.S.C. §§ 1983, 1985, and U.S.C.A. CONST. AMEND XIV, and, in the exercise of its equitable jurisdiction, to order such ancillary relief as a temporary injunction, preliminary injunction, United States citizen redress, and appropriate damages resulting from Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 reckless, willful, wanton, malicious, careless, knowing, deliberate and callous acts or practices, cruel and callous course of conduct and other remedial measures.

175. The Fourteenth Amendment of the United States Constitution, 42 U.S.C. § 1983, & 42 U.S.C. § 1985 authorizes the United States District Court of Central District of California to ORDER AN INJUNCTION RESTRAINING IMMEDIATELY Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 from further violating Fairchild's constitutional civil rights, and **immediately ISSUE AN**

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ORDER DOING the following:

1. ORDER that private party Defendants InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva & DOES 1-10 immediately remove their employees from within ten feet of the outside of the ADA handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012, which leads to the courthouse's second floor entrance.
2. ORDER that the County of Los Angeles hire and place a peace officer or contracted security guard near the outside Stanley Mosk Courthouse, handicap ramp's entrance to ensure the County of Los Angeles's compliance with all applicable state and federal disability laws pursuant to California Civil Code § 51, *et seq* (Unruh Civil Rights Act, California Civil Code §§ 54-55.33 (California Disabled Persons Act), 42 U.S.C. § 12132 *et seq*, 42 U.S.C. § 12203, Title II of the Americans with Disabilities Act of 1990, the California Constitution and the United States Constitution.
3. ORDER County of Los Angeles to post visible  metal ADA signs near the entrance and exit of the outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012, that leads to the second-floor entrance of Stanley Mosk Superior Courthouse.
4. ORDER County of Los Angeles to post a visible metal sign that reads the following:

PROPERTY OF LOS ANGELES COUNTY
TRESPASSING-LOITERING
FORBIDDEN BY LAW
UP TO \$ 1,000 FINE OR SIX MONTHS

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IMPRISONMENT OR BOTH
CALIFORNIA PENAL CODE SECTION 555 et seq

176. Plaintiff Alison Helen Fairchild will suffer irreparable harm by way of loss of her constitutional civil rights and deprivation of constitutional civil rights as Defendants' complete disregard for Plaintiff's civil rights has led to her being unable to enter and prevented from entering outside Stanley Mosk Courthouse handicap ramp between August 1, 2025 and December 17, 2025, and on to this very present day, unless this United States District Court issues an injunction on her behalf restraining Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 from further violating Fairchild's constitutional civil rights protected under California Civil Code § 51, *et seq* (Unruh Civil Rights Act, California Civil Code §§ 54-55.33 (California Disabled Persons Act), 42 U.S.C. § 12132 *et seq*, 42 U.S.C. § 12203, Title II of the Americans with Disabilities Act of 1990, and Title III of the Americans with Disabilities Act of 1990.

177. Plaintiff Alison Helen Fairchild at this moment, respectfully requests that this United States District Court enter an injunction and make such orders or judgments permanently restraining and enjoining Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10, their successors, their agents, their representatives, their employees, and all other persons who act under, by, through, or on behalf of any them and each of them, from engaging in any acts in violation of 42 U.S.C. § 1983, 42 U.S.C. § 1985,

Title II of the Americans with Disabilities Act of 1990 and the Fourteenth Amendment of the United States Constitution.

178. **WHEREFORE**, Plaintiff Alison Helen Fairchild demands injunctive judgment against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 together with costs and attorney's fees in this action.

XVI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff Alison Helen Fairchild respectively prays for judgment on the above-alleged claims for relief against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 as follows:

1. Statutory disbursements, costs, expert fees, and attorney's fees authorized under 42 U.S.C. § 1988(b), and such further and other relief as the Court deems just and proper.

2. Pursuant to 42 U.S.C. § 18116, award compensatory damages, general damages, and special damages to Plaintiff Alison Helen Fairchild in an amount determined by the jury that would fully compensate Ms. Fairchild for the injuries, emotional harm, mental anguish, embarrassment, humiliation, and degradation caused by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10.
3. Pursuant to 42 U.S.C. § 18116, award punitive damages to Plaintiff Alison Helen Fairchild in an amount determined by the jury, but no less than three times the amount of actual damages, which would punish all the above-stated Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10.
4. Pursuant to 42 U.S.C. § 1983, award compensatory damages, special damages, and general damages to Plaintiff Alison Helen Fairchild in an amount determined by the jury that would fully compensate Ms. Fairchild for the injuries, emotional harm, mental anguish, embarrassment, humiliation, and degradation caused by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10.

- 1 5. Pursuant to 42 U.S.C. § 1983, award punitive damages to Plaintiff Alison Helen Fairchild
2 in an amount determined by the jury, but no less than three times the amount of actual
3 damages, that would punish Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn
4 Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo
5 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores,
6 Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10. for the intentional, willful,
7 wanton, cruel, careless, knowing, and reckless misconduct alleged in this civil rights
8 complaint, and that would effectively deter Defendants from future discriminatory
9 behavior.
- 10
11 6. Pursuant to 42 U.S.C. § 1985, award compensatory damages, special damages, and general
12 damages to Plaintiff Alison Helen Fairchild in an amount determined by the jury that
13 would fully compensate Plaintiff Fairchild for the injuries, emotional harm, mental anguish,
14 embarrassment, humiliation, and degradation caused by Defendants Hilda Lucia Solis, Deni
15 K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-
16 Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal
17 LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles &
18 DOES 10'S misconduct alleged in this civil rights complaint.
- 19
20 7. Pursuant to 42 U.S.C. § 1985, award punitive damages to Plaintiff Alison Helen Fairchild
21 in an amount determined by the jury, but no less than three times the amount of actual
22 damages, that would punish Defendants Hilda Lucia Solis, Deni K. Butler, Robert G.
23 Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco
24 Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal
25 Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 for their
26 intentional, cruel, willful, wanton, knowing, careless, deliberate, and reckless misconduct
27 alleged in this civil rights complaint and that would effectively deter Defendants from
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future discriminatory behavior.

8. Pursuant to California Civil Code § 52, award Plaintiff Alison Helen Fairchild the following compensatory, declaratory, and injunctive relief:

- a. A declaratory judgment that at the commencement of this original civil rights action Defendants InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 violated the specific requirements of the Unruh Civil Rights Act.
- b. Irrespective of the Defendants' voluntary cessation of the ADA and Fair Housing violations, if applicable, a permanent injunction pursuant to the Unruh Civil Rights Act, which directs and orders Defendants InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 to take all steps necessary to stop discriminating against Fairchild, including but not limited to Defendants' under color of law illegal acts and actions of allowing their employees to recklessly block the entrance and exit of a Stanley Mosk Superior Court ADA handicap ramp.
- c. Irrespective of the Defendants' voluntary cessation of the ADA and violations, if applicable, the payment of costs of this civil rights lawsuit.
- d. Irrespective of the Defendants' voluntary cessation of the ADA violations, if applicable, the payment of attorney's fees.
- e. For damages in an amount of no less than \$ 4,000.

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- f. The provision of whatever other relief this United States District Court deems just, equitable, and appropriate pursuant to Defendants' reckless, cruel, willful, wanton, malicious, careless, knowing, deliberate, and callous violations of the California Unruh Civil Rights Act.
9. Award Plaintiff Alison Helen Fairchild damages (non-economic), special damages (economic), actual and compensatory damages in an amount to be determined at trial to compensate her for the California tort of general negligence as alleged against Defendants InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10
10. Award Plaintiff Alison Helen Fairchild damages (non-economic), special damages (economic), actual and compensatory damages in an amount to be determined at trial to compensate her for the California tort of negligent intentional infliction of emotional distress as alleged against Defendants InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10
11. Award Plaintiff Alison Helen Fairchild general damages (non-economic), special damages (economic), and actual and compensatory damages against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, LASD Court Services Senior Deputy Sheriff Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-1 including damages for, without limitation, embarrassment, humiliation, anxiety, depression, a complete disruption of life, physical pain and suffering, emotional pain, and suffering, multiple sclerosis relapses, multiple sclerosis hugs, insomnia, chest pain, inconvenience, heart

palpitations, frustration, mental anguish, emotional distress, loss of enjoyment of life, loss of civil rights, deprivation of constitutional rights, and other pain and suffering on all claims allowed by the law in the amount of **\$ 13,000,000**, or a much more significant amount as may be set by a jury.

12. Award Plaintiff Alison Helen Fairchild punitive damages in the amount of **\$ 33,000,000** to impress upon Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 for the seriousness of their egregious conduct and to deter similar behavior in the future.
13. Award Alison Helen Fairchild interest from August 1, 2025.
14. Award Alison Helen Fairchild reasonable attorney's fees pursuant to 42 U.S.C. § 1988.
15. Award Plaintiff Alison Helen Fairchild medical, incidental, and hospital expenses according to proof.
16. Award Plaintiff Alison Helen Fairchild consequential damages in a sum reasonable to proof.
17. Award Plaintiff Alison Helen Fairchild injunctive relief against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, LASD Court Services Senior Deputy Sheriff Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores,

1 Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 pursuant to 42 U.S.C. §§
2 1983, 1985 & USCA CONST. AMEND. XIV and enjoin Defendants, and also order the
3 above-stated Defendants cease aiding and abetting and participating in the illegal
4 operation of blocking an ADA handicap ramp located at 111 North Hill Street, Los
5 Angeles, CA 90012.

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7 18. Award Plaintiff Alison Helen Fairchild injunctive relief against Defendants InfoTrack
8 US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-
9 Silva, and DOES 1-10 pursuant to the California Unruh Civil Rights Act [Cal. Civ. Code
10 §§ 51 & 52.

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12 19. Order all other and further relief as the Court may deem equitable, just, and proper.
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1 **XIV. DEMAND FOR JURY TRIAL**

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3 Plaintiff Alison Helen Fairchild hereby demands a trial by jury for issues triable by a
4 United States District Court jury.

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7 Respectfully Submitted,

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11 **DATE: December 22, 2025**

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16 BY: _____

17 **Neil E. Opdahl**
18 **attorney@neilopdahl.com**
19 **SBN: 277596**
20 **473 E. Carnegie Drive**
21 **Suite 200**
22 **San Bernardino, CA 92408**
23 **Mobile: (626) 429-6578**

24 *Attorney for Plaintiff*

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VERIFICATION OF PLAINTIFF ALISON HELEN FAIRCHILD

United States of America

State of California

City of Loma Linda, California, Within the County of San Bernardino

I, **ALISON HELEN FAIRCHILD**, being duly sworn, say:

I, **ALISON HELEN FAIRCHILD**, am the Plaintiff in the above-entitled action and proceeding.

I have read the foregoing:

VERIFIED ORIGINAL CIVIL RIGHTS COMPLAINT FOR INJUNCTIVE RELIEF, DECLARATORY RELIEF, GENERAL DAMAGES, COMPENSATORY DAMAGES, SPECIAL DAMAGES & PUNITIVE DAMAGES FOR VIOLATION OF 42 U.S.C. §§ 1983, 1985, & 1986; U.S.C.A. CONST. AMEND. XIV; CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE, GROSS NEGLIGENCE, & NEGLIGENT IED AGAINST PRIVATE PARTY DEFENDANTS ONLY; VIOLATION OF [42 U.S.C. § 12101, 12203] (retaliation, intimidation, threats, and interference of civil rights); VIOLATION OF TITLE III OF AMERICANS WITH DISABILITIES ACT OF 1990 [42 U.S.C. § 12101]; VIOLATION OF TITLE II OF THE AMERICANS WITH DISABILITIES ACT OF 1990 [42 U.S.C. § 12132, *et seq*]; VIOLATION OF CALIFORNIA CIVIL CODE § 51, *et seq* [THE UNRUH CIVIL RIGHTS ACT] (denial of access to full and equal accommodation, advantages, facilities, privileges and services); VIOLATION OF CALIFORNIA CIVIL CODE § 51.5, VIOLATION OF CALIFORNIA CIVIL CODE § 51.7; VIOLATION OF CALIFORNIA CIVIL CODE § 52.1

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1 and know the contents thereof. The facts stated therein are true and within my personal
2 knowledge, [except as to those matters which are therein alleged on information and belief, and
3 as to those matters, I believe them to be true], and if called upon to testify, I would competently
4 testify as to the matters stated herein.

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13 **I declare under penalty of perjury under the laws and Constitution of California**
14 **and the United States that every word, sentence, paragraph, and page of this**
15 **Original Civil Rights Complaint and Verification is true and correct.**

16
17 **DATE: December 22, 2025**

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20 

21
22 **ALISON HELEN FAIRCHILD**
23 **1308 East Colorado Blvd.**
24 **Pasadena, CA 91106**
25 **Mobile: (626) 755-6442**

26
27 Email: fairchildadacrusader@gmail.com

28

Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 1983 [UNDER COLOR LAW GROSS NEGLIGENCE], 42 U.S.C. §§ 1983, 1985, & 1986, 42 U.S.C. § 12132; U.S.C.A. CONST. AMEND. XIV, CALIFORNIA TORTS GENERAL NEGLIGENCE, NEGLIGENCE PER SE & NEGLIGENCE HED & AGAINST PRIVATE PARTY DEFENDANTS.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

ALISON HELEN FAIRCHILD,

Plaintiff(s)

v.

Lindsey Patrice Horvath, Robert G. Luna, Shawn R.
Kehoe, Songfong Tommy Wang, Fae Chen, Chen
Property RH LLC, County of Los Angeles & DOES
1-10

Defendant(s)

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) Civil Action No. 2:25-cv-06204-RAO
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)

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

ROBERT G. LUNA
4900 SOUTH EASTERN AVENUE
SUITE 102
COMMERCE, CA 90040

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

NEIL E. OPDAHL, ESQ. (SBN # 277596)
473 E. CARNEGIE DRIVE
SUITE 200
SAN BERNARDINO, CA 92408
Mobile: (206) 429-6578
Email: attorney@neilopdahl.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:25-cv-06204-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:25-cv-06204-RAO

PROOF OF SERVICE

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_____ on *(date)* _____ ; or

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_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

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☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

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I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Central District of California

ALISON HELEN FAIRCHILD,

Plaintiff(s)

V.

Lindsey Patrice Horvath, Robert G. Luna, Shawn R. Kehoe, Songfong Tommy Wang, Fae Chen, Chen Property RH LLC, County of Los Angeles & DOES
1-10

Defendant(s)

Civil Action No. 2:25-cv-06204-RAO

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

SONGFONG TOMMY WANG
18645 GALE AVENUE
SUITE 205
CITY OF INDUSTRY, CA 90040

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: NEIL E. OPDAHL, ESQ. (SBN # 277596)

473 E. CARNEGIE DRIVE
SUITE 200
SAN BERNARDINO, CA 92408
Mobile: (206) 429-6578
Email: attorney@neilopdahl.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:25-cv-06204-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

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☐ I personally served the summons on the individual at *(place)* _____
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☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
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☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

ALISON HELEN FAIRCHILD,

Plaintiff(s)

v.

Lindsey Patrice Horvath, Robert G. Luna, Shawn R.
Kehoe, Songfong Tommy Wang, Fae Chen, Chen
Property RH LLC, County of Los Angeles & DOES
1-10

Defendant(s)

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) Civil Action No. 2:25-cv-06204-RAO
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SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

SONGFONG TOMMY WANG
4058 HOOSIER LAWN WAY
YORBA LINDA, CA 92886

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

NEIL E. OPDAHL, ESQ. (SBN # 277596)
473 E. CARNEGIE DRIVE
SUITE 200
SAN BERNARDINO, CA 92408
Mobile: (206) 429-6578
Email: attorney@neilopdahl.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:25-cv-06204-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

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_____ on *(date)* _____; or

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on *(date)* _____, and mailed a copy to the individual's last known address; or

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designated by law to accept service of process on behalf of *(name of organization)* _____
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☐ I returned the summons unexecuted because _____; or

☐ Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

ALISON HELEN FAIRCHILD,

Plaintiff(s)

v.

Lindsey Patrice Horvath, Robert G. Luna, Shawn R.
Kehoe, Songfong Tommy Wang, Fae Chen, Chen
Property RH LLC, County of Los Angeles & DOES
1-10

Defendant(s)

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) Civil Action No. 2:25-cv-06204-RAO
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SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

FAE CHEN
2240 E. WINSTON ROAD
ANAHEIM, CA 92806

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

NEIL E. OPDAHL, ESQ. (SBN # 277596)
473 E. CARNEGIE DRIVE
SUITE 200
SAN BERNARDINO, CA 92408
Mobile: (206) 429-6578
Email: attorney@neilopdahl.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:25-cv-06204-RAO

PROOF OF SERVICE

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☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

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designated by law to accept service of process on behalf of *(name of organization)* _____
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☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

UNITED STATES DISTRICT COURT

for the

Central District of California

ALISON HELEN FAIRCHILD,

Plaintiff(s)

V.

Lindsey Patrice Horvath, Robert G. Luna, Shawn R. Kehoe, Songfong Tommy Wang, Fae Chen, Chen Property RH LLC, County of Los Angeles & DOES
1-10

Defendant(s)

Civil Action No. 2:25-cv-06204-RAO

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

CHEN PROPERTY RH LLC
19573 CRONIN DRIVE
ROWLAND HEIGHTS, CA 91748

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: NEIL E. OPDAHL, ESQ. (SBN # 277596)

473 E. CARNEGIE DRIVE
SUITE 200
SAN BERNARDINO, CA 92408
Mobile: (206) 429-6578
Email: attorney@neilopdahl.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:25-cv-06204-RAO

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
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_____, a person of suitable age and discretion who resides there,
on *(date)* _____ , and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____ , who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

ALISON HELEN FAIRCHILD,

Plaintiff(s)

v.

Lindsey Patrice Horvath, Robert G. Luna, Shawn R.
Kehoe, Songfong Tommy Wang, Fae Chen, Chen
Property RH LLC, County of Los Angeles & DOES
1-10

Defendant(s)

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) Civil Action No. 2:25-cv-06204-RAO
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SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

ORANGE CHEN'S PROPERTY LLC
2240 E. WINSTON ROAD
ANAHEIM, CA 92806

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

NEIL E. OPDAHL, ESQ. (SBN # 277596)
473 E. CARNEGIE DRIVE
SUITE 200
SAN BERNARDINO, CA 92408
Mobile: (206) 429-6578
Email: attorney@neilopdahl.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 2:25-cv-06204-RAO

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(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

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Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Central District of California

ALISON HELEN FAIRCHILD,

Plaintiff(s)

v.

Lindsey Patrice Horvath, Robert G. Luna, Shawn R.
Kehoe, Songfong Tommy Wang, Fae Chen, Chen
Property RH LLC, County of Los Angeles & DOES
1-10

Defendant(s)

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) Civil Action No. 2:25-cv-06204-RAO
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SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)*

COUNTY OF LOS ANGELES
500 WEST TEMPLE STREET
ROOM 383
LOS ANGELES, CA 90012

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

NEIL E. OPDAHL, ESQ. (SBN # 277596)
473 E. CARNEGIE DRIVE
SUITE 200
SAN BERNARDINO, CA 92408
Mobile: (206) 429-6578
Email: attorney@neilopdahl.com

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CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

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I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

1 *Neil E. Opdahl-Lopez, Esq. (SBN # 277596)*

2 *Major, USMCR*

3 **473 E. Carnegie Drive, # 200**

4 **San Bernardino, CA 92408**

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

7 attorney@neilopdahl.com

8 **Attorney for Plaintiff**

9
10
11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF THE STATE OF CALIFORNIA**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **WESTERN DIVISION**
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11 ALISON HELEN FAIRCHILD,

12 Plaintiff,

13 v.

14 HILDA LUCIA SOLIS, et al

15 Defendant(s),
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25

Case No.: 5:25-cv-03510-GHW(AJR)

USDJ: Honorable George H. Wu
Court: First Street United States Courthouse
Los Angeles, CA 90012
Courtroom 9D, 9th Floor

USMJ: Honorable A. Joel Richlin
Court: 255 E. Temple Street
Los Angeles, CA 90012
Courtroom 780, 7th Floor

**APPENDIX OF EXHIBITS IN SUPPORT OF
PLAINTIFF'S ORIGINAL CIVIL RIGHTS
COMPLAINT; DECLARATION OF AROGANT
HOLLYWOOD, ADMISSIBILITY, SELF-
AUTHENTICATION, & CERTIFICATION OF
ATTACHED DOCUMENTS BY AROGANT
HOLLYWOOD PURSUANT TO FEDERAL
RULES OF EVIDENCE RULES 401, 402, 803, 807,
902, 1001-1008 CERTIFICATION &
AUTHENTICATION OF ALL SUBMITTED
EXHIBITS**

26 **PLAINTIFF'S FIRST VERIFIED APPENDIX OF EXHIBITS**
27
28

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR

473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408

Email: attorney@neilopdahl.com

Phone: 626.429.6578

Case No. 5:25-cv-03510-GHW(AJR)

1 **TO ALL PARTIES, NON-PARTIES, AND TO ALL THEIR ATTORNEYS OF RECORD:**

2
3 **PLEASE TAKE NOTICE** that Plaintiff Alison Helen Fairchild hereby submits the attached
4 declaration of Arogant Hollywood, and Appendix of Exhibits in support of Plaintiff's Original
5 Complaint, and Certification and Authentication of Exhibits. Each of these exhibits submitted by
6 non-party Arogant Hollywood was and has been founded by the concurrently filed Declaration of
7 Arogant Hollywood and Exhibits Containing Declarations, which are submitted herewith in
8 connection with this Verified Appendix of Exhibits.
9

10
11 **Dated: December 26, 2025**



12
13
14
15 BY:

16 Neil E. Opdahl-Lopez, Esq. (SBN # 277596)
17 **Major, USMCR**
18 **San Bernardino, CA 92408**
19 Mobile: 626.429.6578
20 Facsimile: 888.298.7284
21 attorney@neilopdahl.com

22 **Attorney for Plaintiff**

23
24
25
26 **PLAINTIFF'S FIRST VERIFIED APPENDIX OF EXHIBITS**

27
28 Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

DECLARATION OF AROGANT HOLLYWOOD

I, AROGANT HOLLYWOOD, DECLARE AS FOLLOWS:

1. I am over the age of 18 years old and not a party to the above-captioned civil rights lawsuit.
2. If I were called as a witness, I could and would testify to those facts as the truth, the whole truth, and nothing but the truth.
3. Since at least 2011, I have been both an atheist and agnostic, and thus, I am unable to swear herein under any “*god*” pretense.
4. Attached hereto as **Exhibit 1** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010703**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 8:38:35 AM, Size: 1.31 MB (1,370,919 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 8:38:35 AM, Modified On Saturday, December 20, 2025, 8:38:35 AM, Accessed: Today, December 26, 2025, 2:20:44 PM. This photograph shows

DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

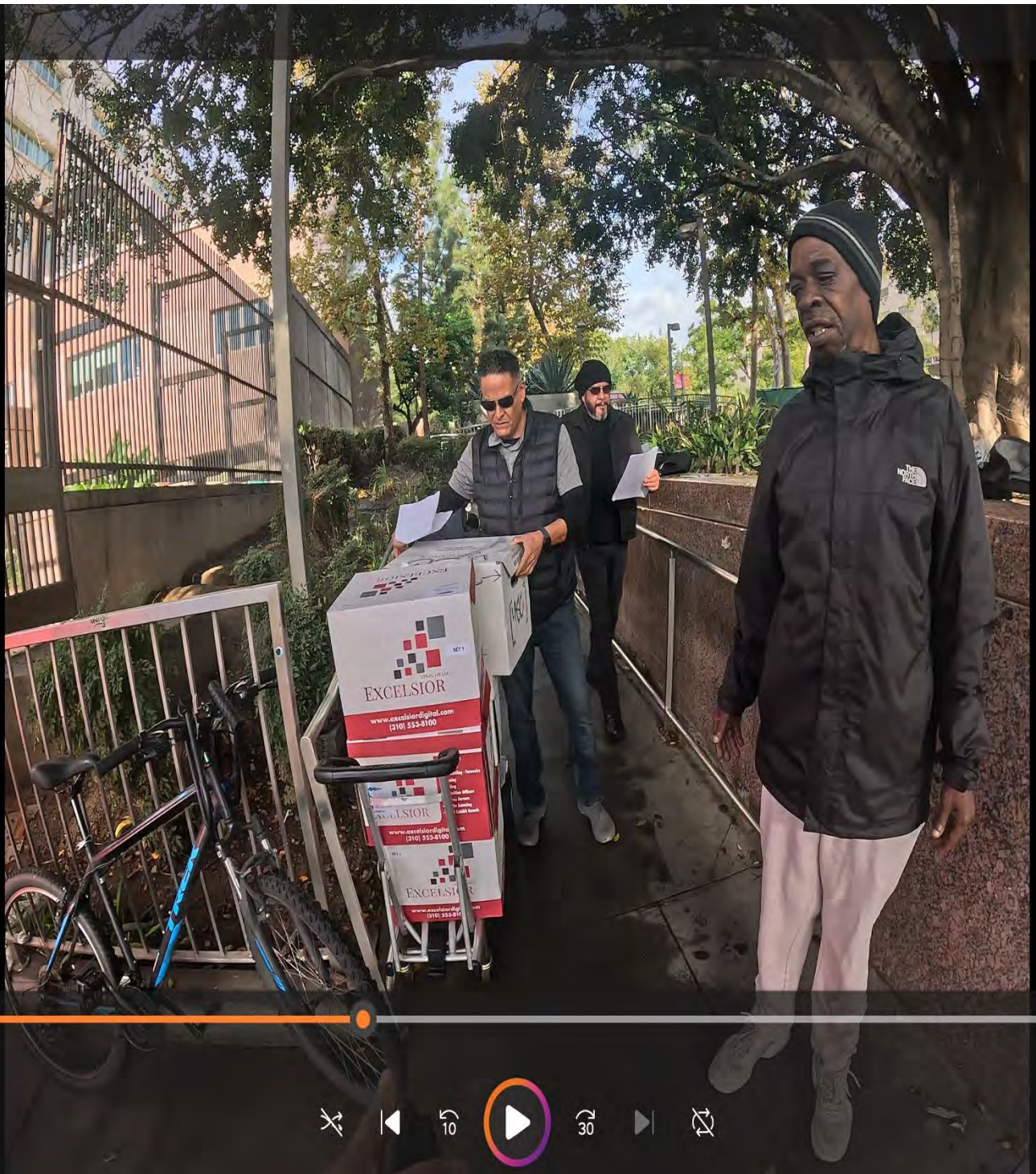
Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

1 a still image of the original GoPro video recording, which was titled **GX010703** at the time of
2 creation and filming. In the image, the video recording **GX010703** is paused at 0:02:26 (two
3 minutes and twenty-six seconds) and depicts numerous individuals and their legal boxes
4 blocking the entrance of the Stanley Mosk Superior Court outside handicap ramp located at 111
5 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010703** is
6 paused at 0:02:26 (two minutes and twenty-six seconds) and depicts numerous individuals and
7 boxes blocking the guardrails and handrails of the Stanley Mosk Superior Court outside
8 handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro
9 video recording was created on November 17, 2025, at 7:21 AM. Please see attached.

26 **DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

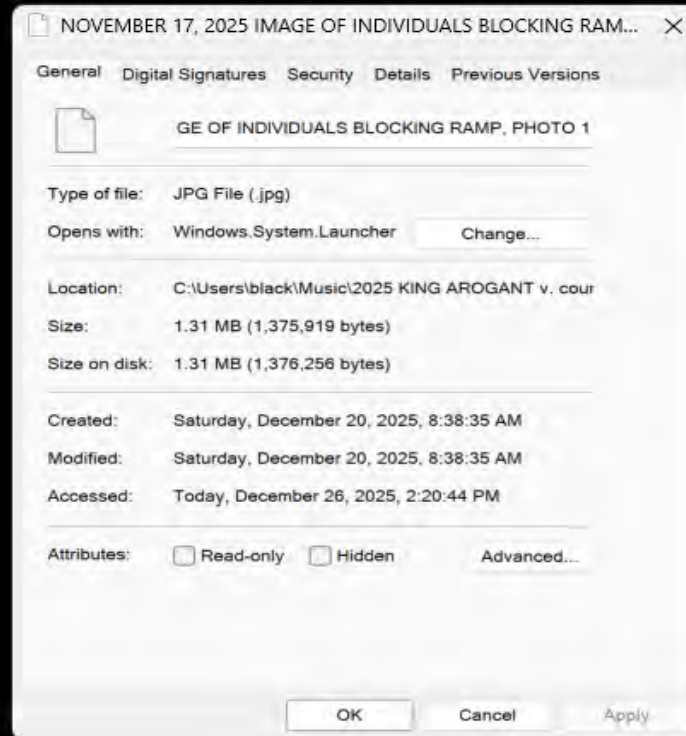
27
28 Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

a Player



DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

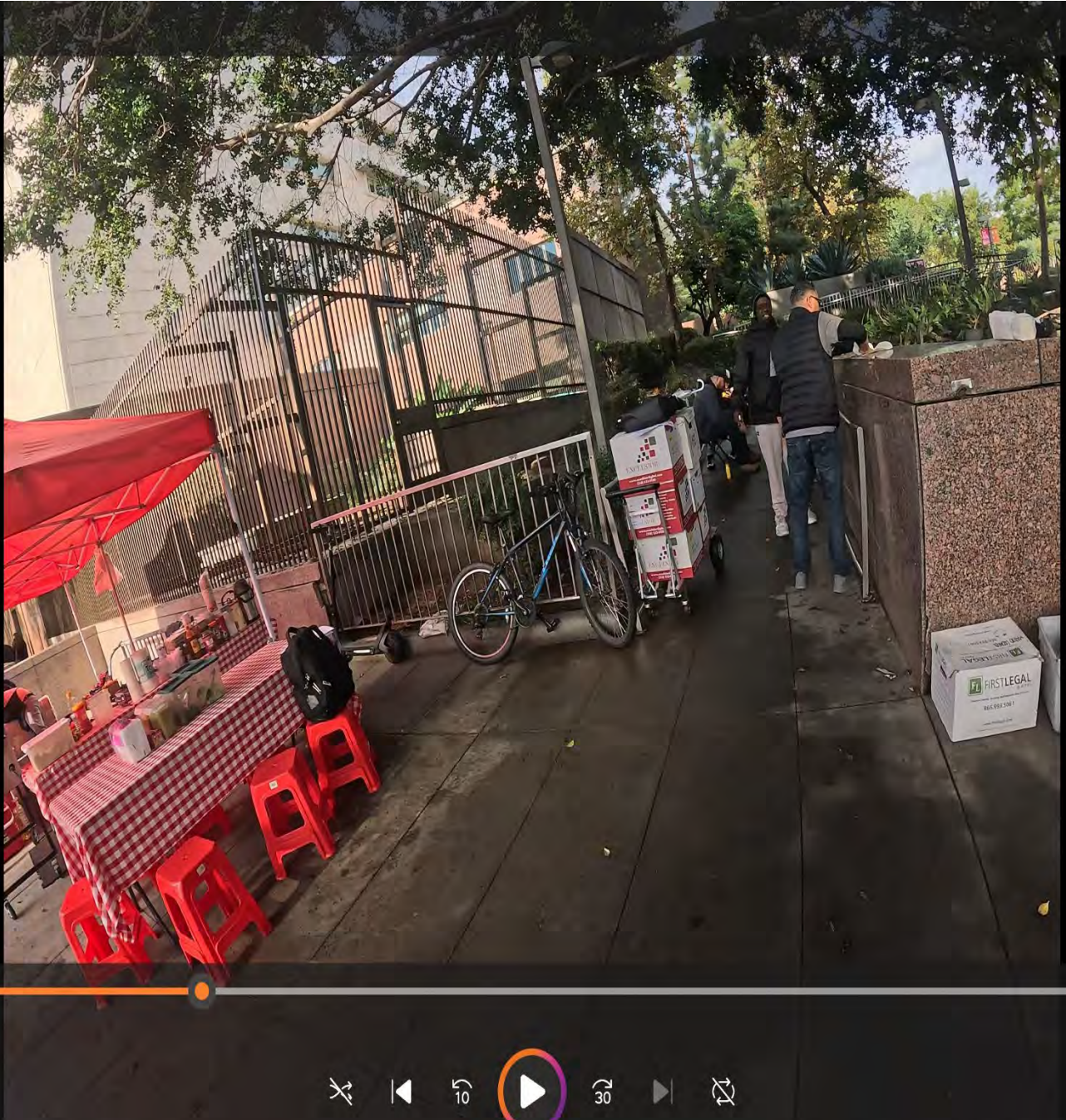
5. Attached hereto as **Exhibit 2** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010703**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 8:46:13 AM, Size: 1.34 MB (1,413,019 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 8:46:13 AM, Modified On Saturday, December 20, 2025, 8:46:14 AM, Accessed: Today, December 26, 2025, 3:29 PM. This photograph shows a still image of the original GoPro video recording, which was titled **GX010703** at the time of creation and filming. In the image, the video recording **GX010703** is paused at 0:01:45 (one minute and forty-five seconds) and depicts numerous individuals and their legal boxes blocking the entrance of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010703** is paused at 0:01:45 (one minute and forty-five seconds) and depicts numerous individuals and boxes blocking the guardrails and handrails of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro video recording was created on November 17, 2025, at 7:21 AM. Please see attached.

DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

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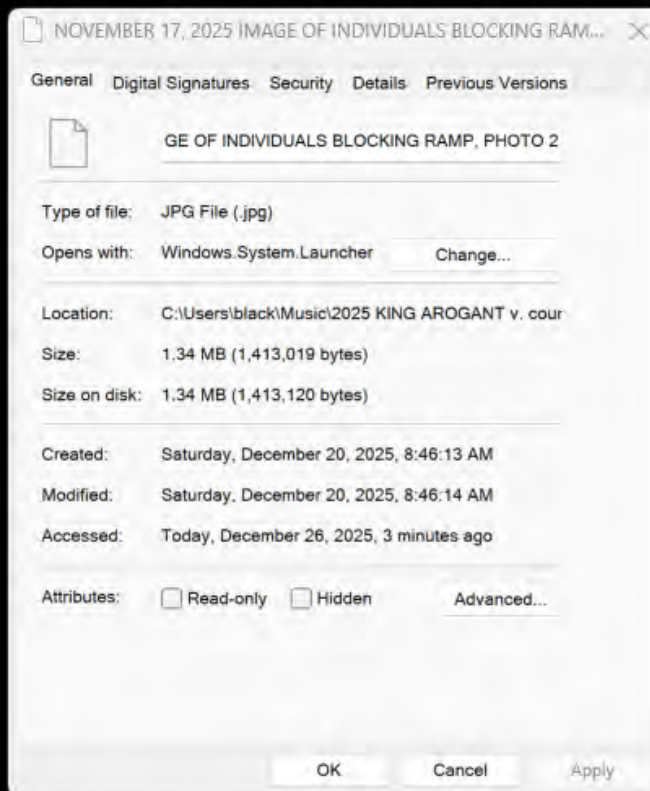
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Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



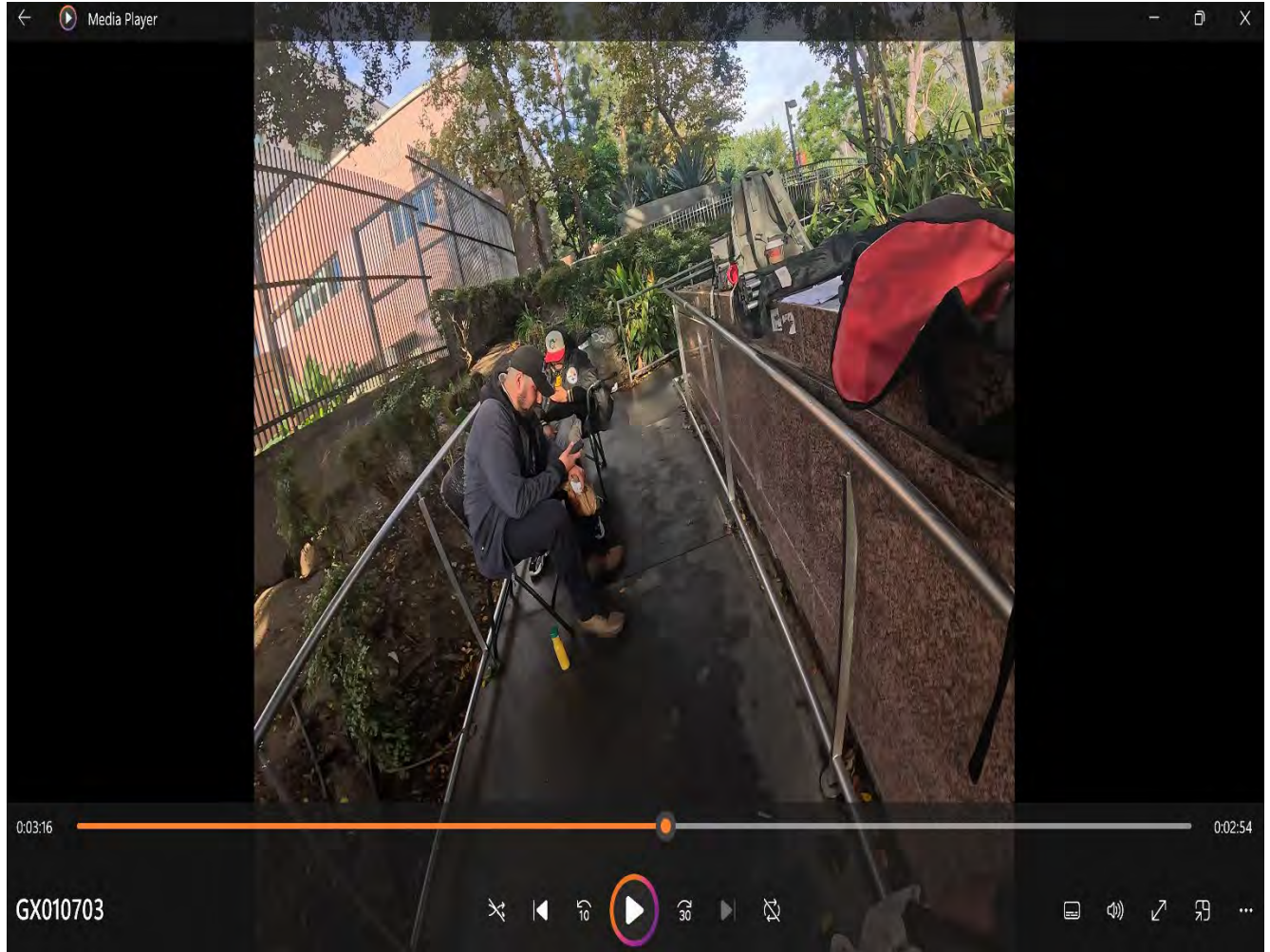
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

6. Attached hereto as **Exhibit 3** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010703**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 8:51:13 AM, Size: 1.16 MB (1,219,938 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 8:51:13 AM, Modified On Saturday, December 20, 2025, 8:51:13 AM, Accessed: Today, December 26, 2025, 4:15 PM. This photograph shows a still image of the original GoPro video recording, which was titled **GX010703** at the time of creation and filming. In the image, the video recording **GX010703** is paused at 0:03:16 (three minutes and sixteen seconds) and depicts numerous individuals and their chairs blocking the path midway through the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010703** is paused at 0:03:16 (three minutes and sixteen seconds) and depicts numerous individuals and boxes blocking the guardrails and handrails of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro video recording was created on November 17, 2025, at 7:21 AM. Please see attached.

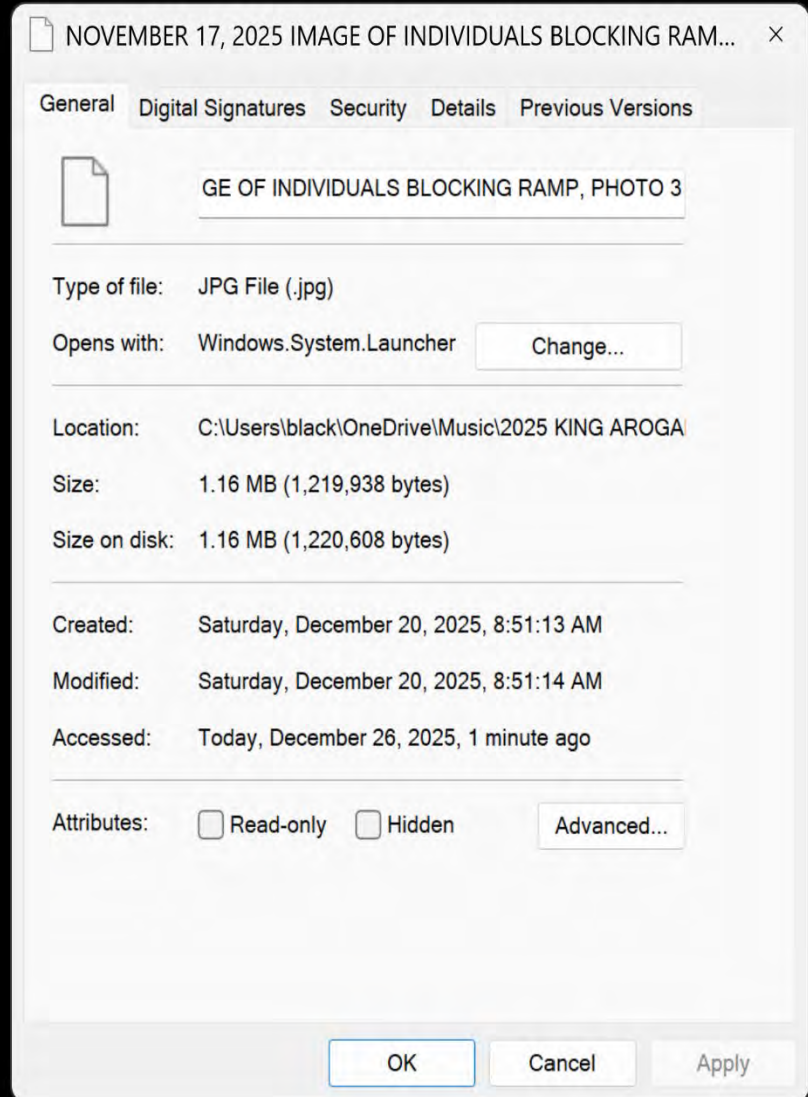
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



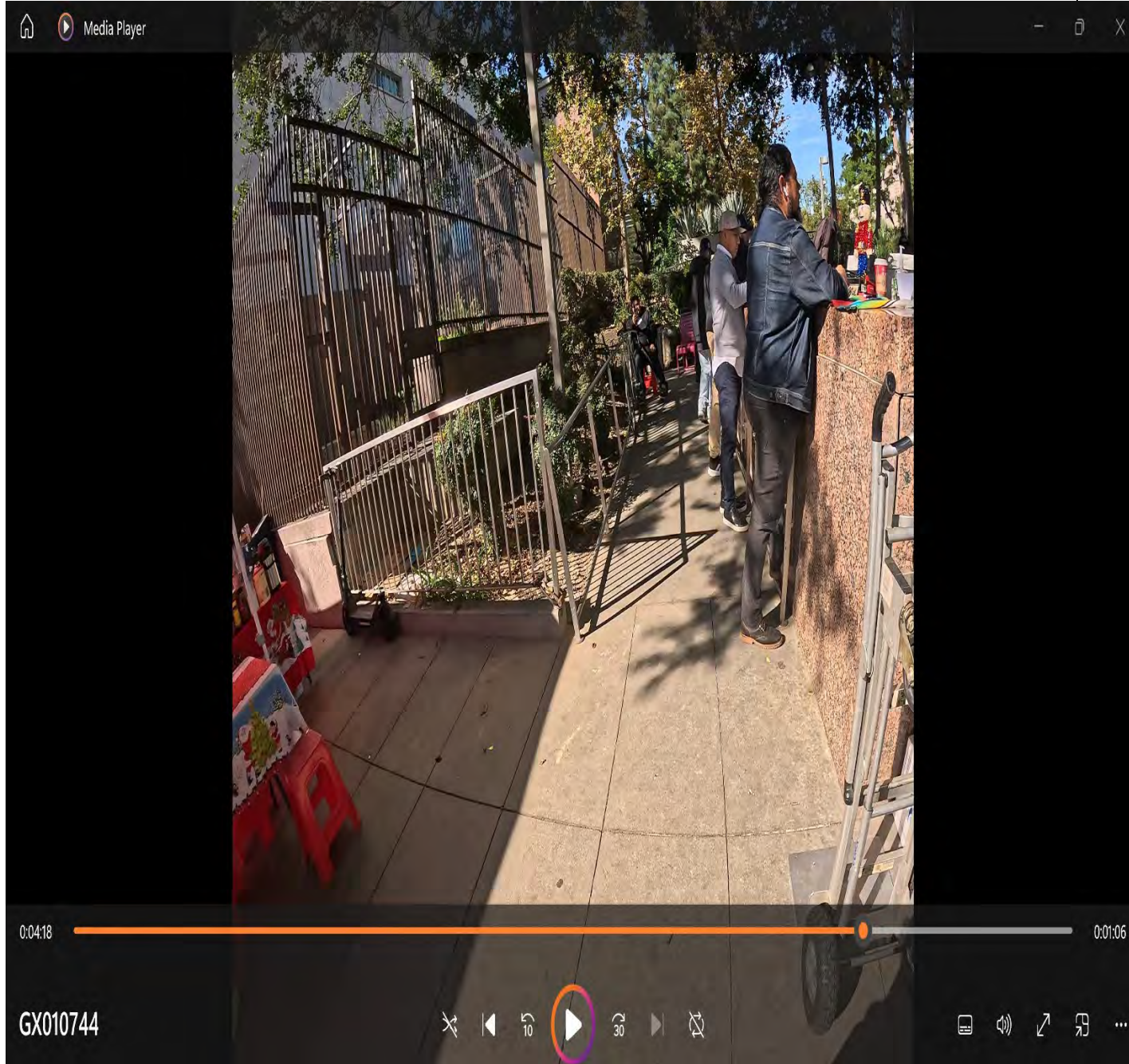
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Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

7. Attached hereto as **Exhibit 4** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010744**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 10:22:52 AM, Size: 1.45 MB (1,531,340 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 10:22:52 AM, Modified On Saturday, December 20, 2025, 10:22:53 AM, Accessed: Today, December 27, 2025, 3:06 AM. This photograph shows a still image of the original GoPro video recording, which was titled **GX010744** at the time of creation and filming. In the image, the video recording **GX010744** is paused at 0:04:18 (four minutes and eighteen seconds) and depicts numerous individuals blocking the entrance and the path midway through the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010744** is paused at 0:04:18 (four minutes and eighteen seconds) and depicts numerous individuals and their chairs blocking the guardrails and handrails of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro video recording was created on December 2, 2025, 2025, at 10:51 AM. Please see attached.

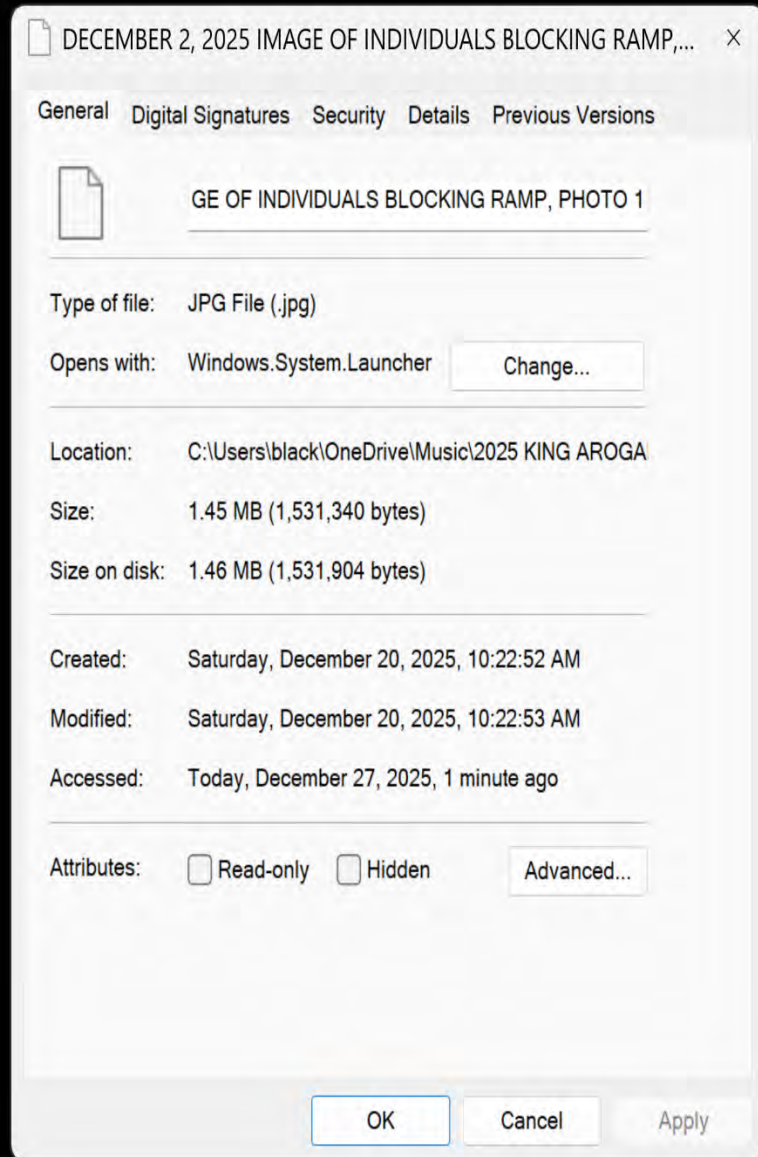
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



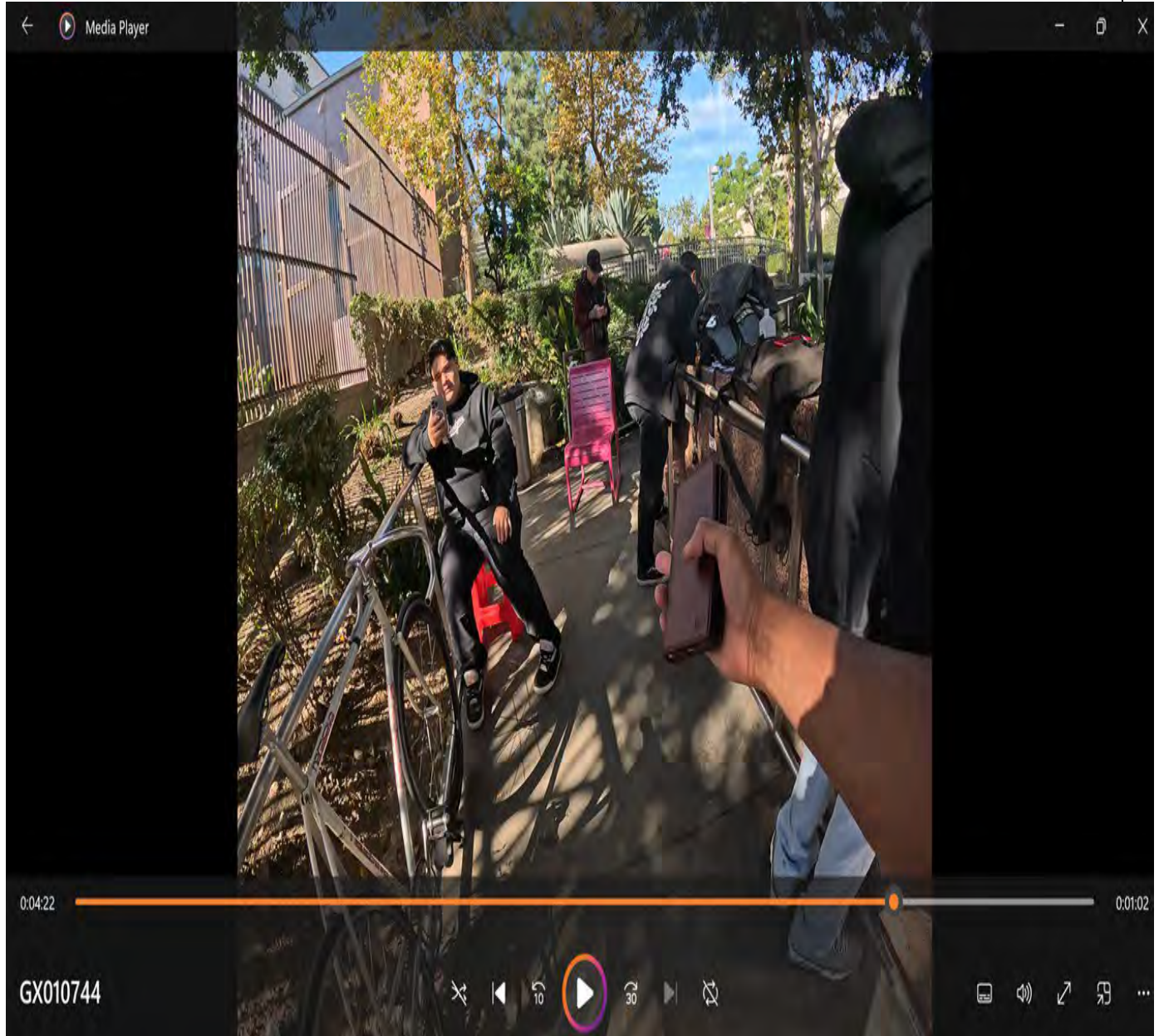
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

8. Attached hereto as **Exhibit 5** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010744**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 10:27:49 AM, Size: 224 KB (229,964 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 10:27:49 AM, Modified On Saturday, December 20, 2025, 10:27:49 AM, Accessed: Today, December 27, 2025, 2:33 PM. This photograph shows a still image of the original GoPro video recording, which was titled **GX010744** at the time of creation and filming. In the image, the video recording **GX010744** is paused at 0:04:22 (four minutes and twenty-two seconds) and depicts numerous individuals blocking the entrance and the path midway through the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010744** is paused at 0:04:22 (four minutes and twenty-two seconds) and depicts numerous individuals and their chairs blocking the guardrails, handrails, and pathway of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro video recording was created on December 2, 2025, 2025, at 10:51 AM. Please see attached.

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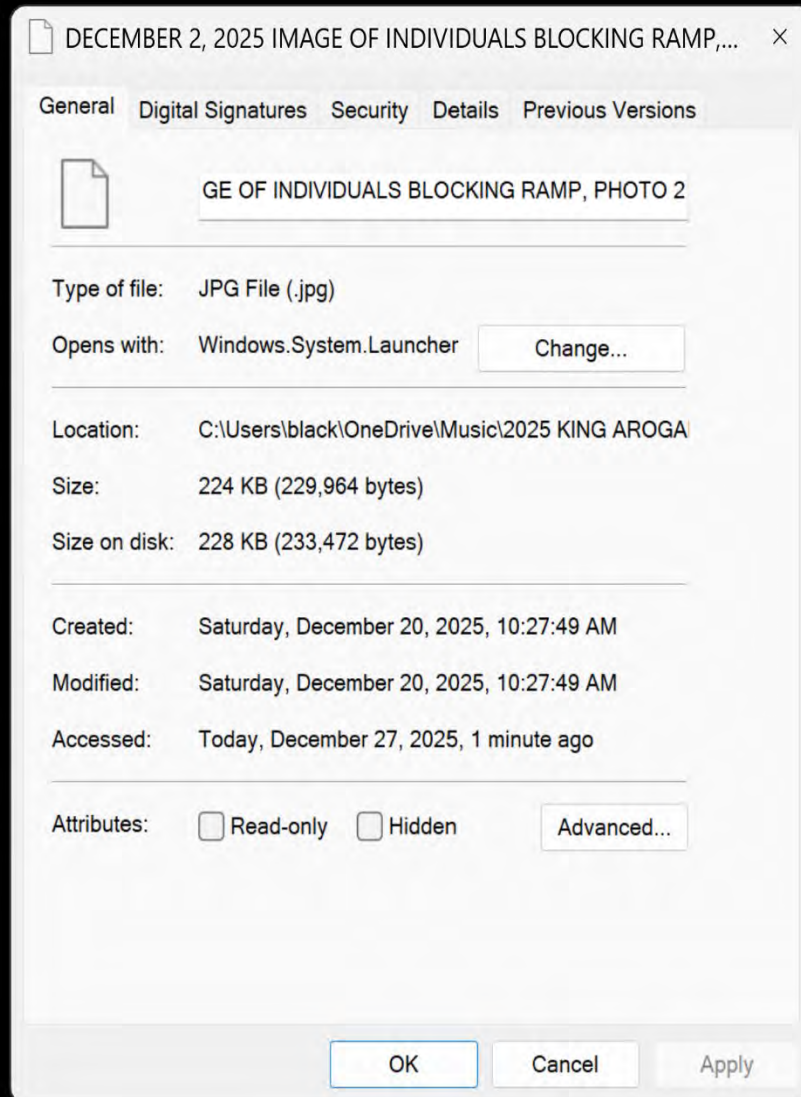
Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

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Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

9. Attached hereto as **Exhibit 6** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010744**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 10:26:07 AM, Size: 1.34 MB (1,411,749 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 10:26:07 AM, Modified On Saturday, December 20, 2025, 10:26:07 AM, Accessed: Today, December 27, 2025, 4:04 PM (3 minutes ago). This photograph shows a still image of the original GoPro video recording, which was titled **GX010744** at the time of creation and filming. In the image, the video recording **GX010744** is paused at 0:04:25 (four minutes and twenty-five seconds) and depicts one individual leaning on the guardrails and handrails of the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010744** is paused at 0:04:22 (four minutes and twenty-two seconds) and depicts a large pink chair blocking the pathway of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro video recording was created on December 2, 2025, 2025, at 10:51 AM. Please see attached.

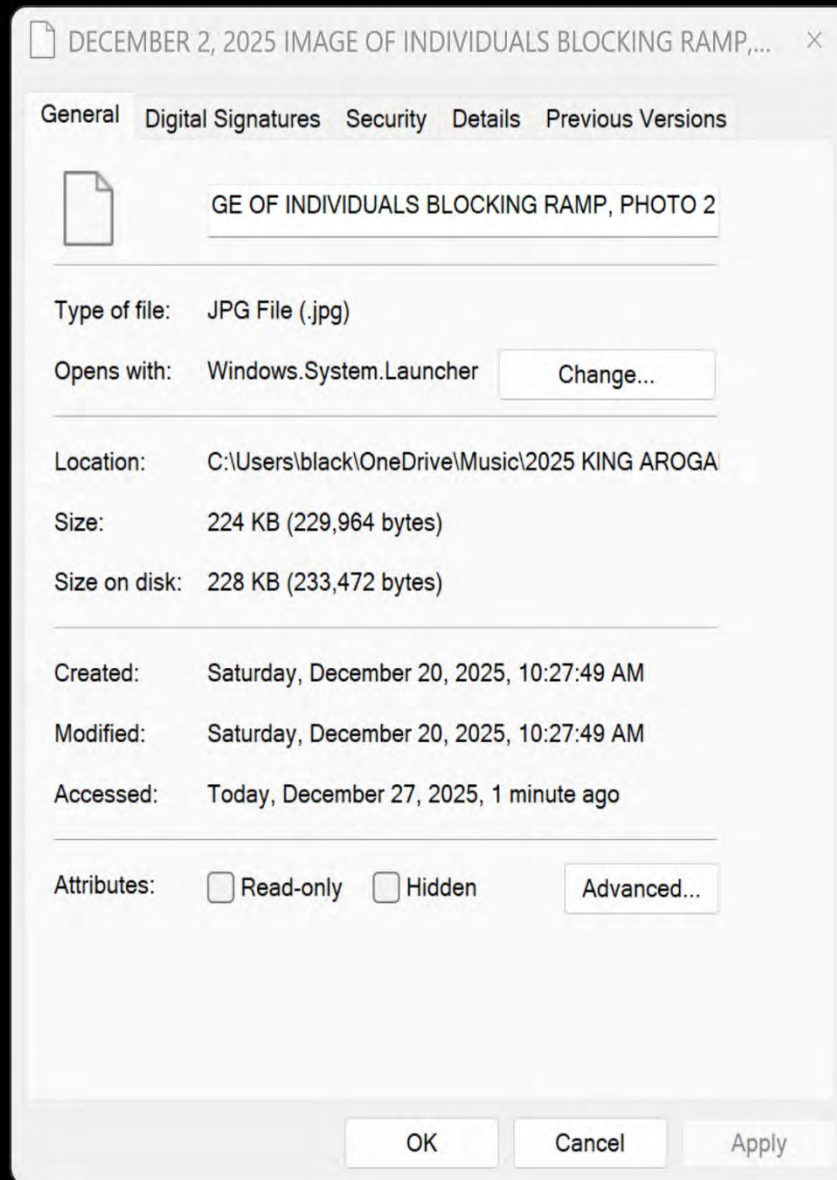
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



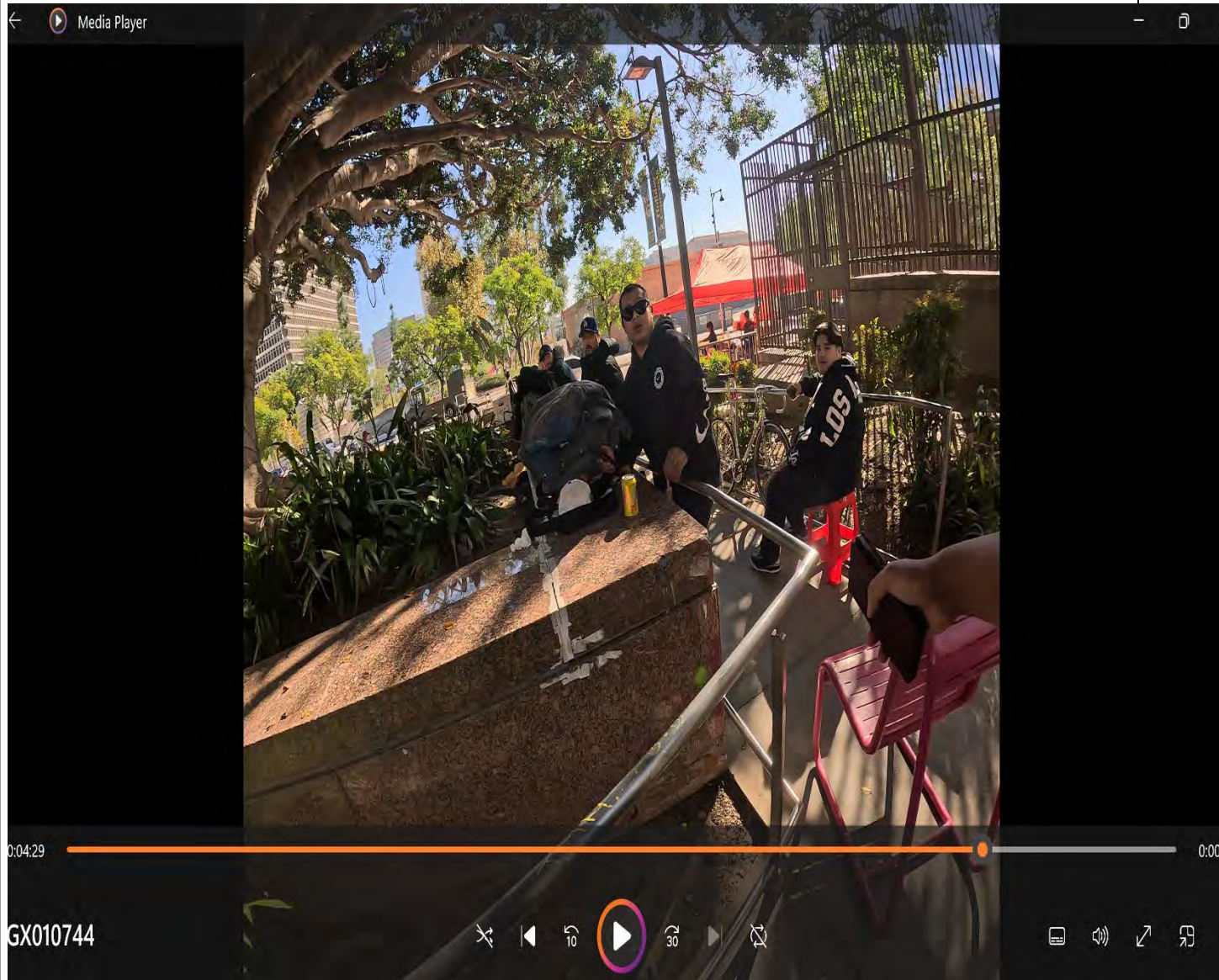
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

10. Attached hereto as **Exhibit 7** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010744**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 10:35:23 AM, Size: 1.40 MB (1,473,946 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 10:36:23 AM, Modified On Saturday, December 20, 2025, 10:35:23 AM, Accessed: Today, December 27, 2025, 5:05 PM (2 minutes ago). This photograph shows a still image of the original GoPro video recording, which was titled **GX010744** at the time of creation and filming. In the image, the video recording **GX010744** is paused at 0:04:29 (four minutes and twenty-nine seconds) and depicts numerous individuals leaning on the guardrails and handrails of the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010744** is paused at 0:04:29 (four minutes and twenty-nine seconds) and depicts a large pink chair blocking the pathway of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro video recording was created on December 2, 2025, 2025, at 10:51 AM. Please see attached.

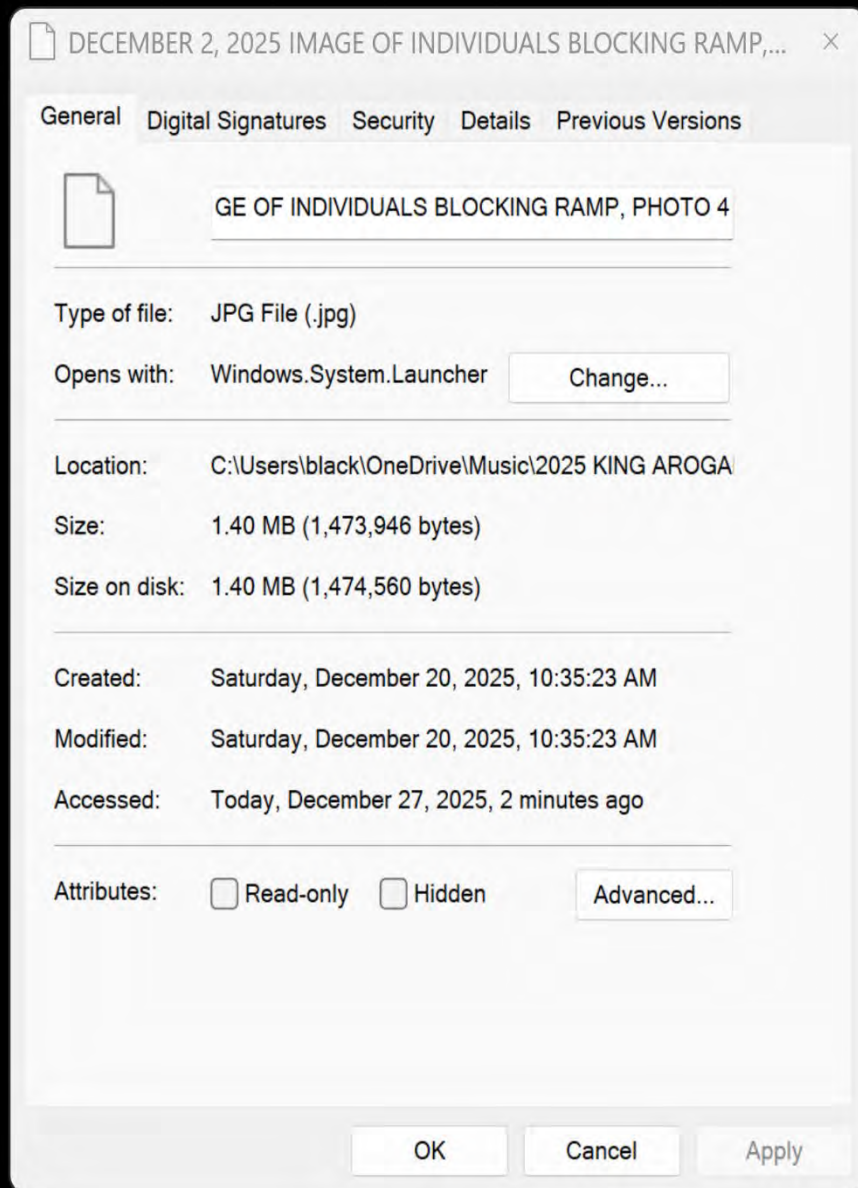
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



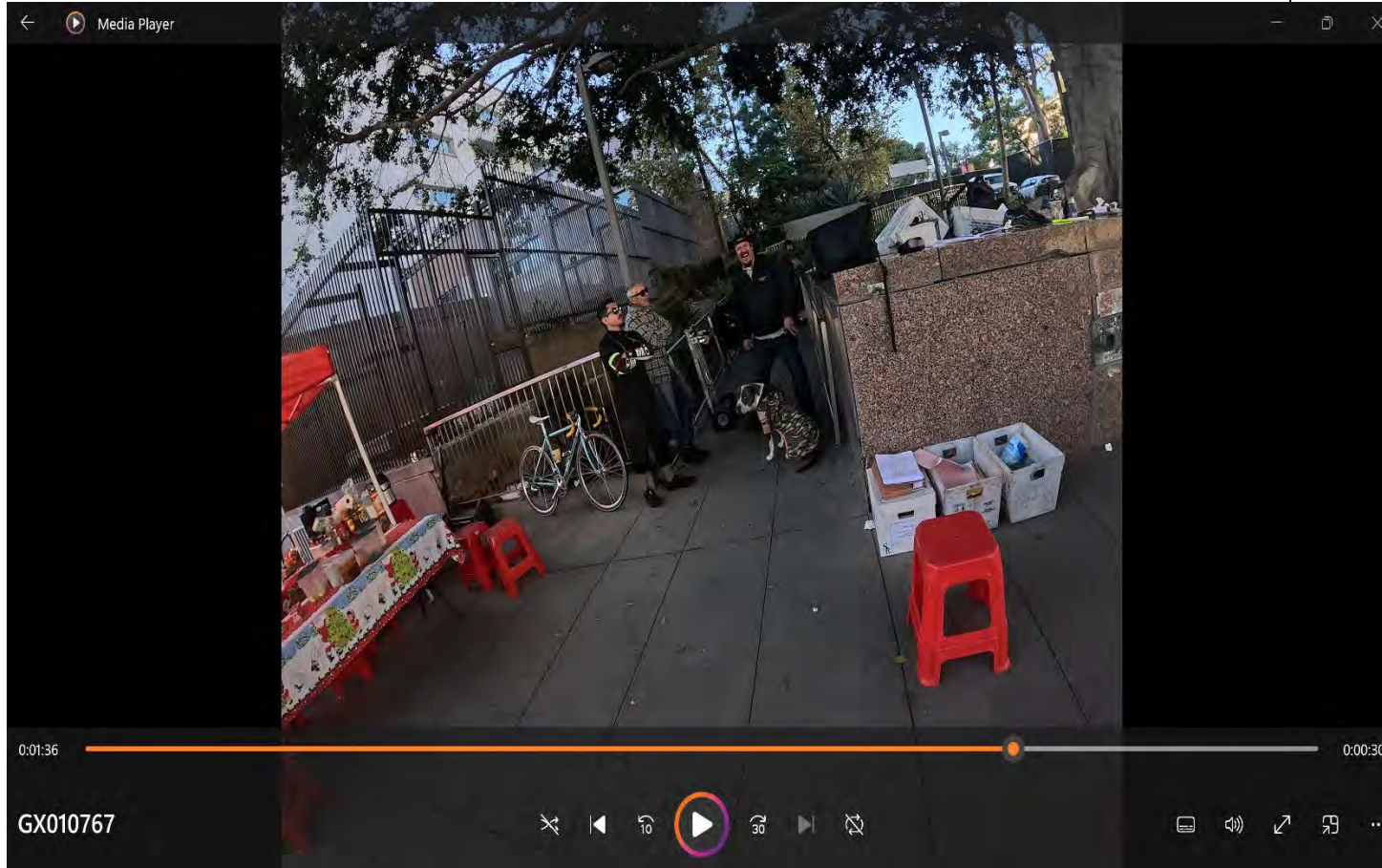
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

11. Attached hereto as **Exhibit 8** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010767**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 11:39 AM, Size: 1.21 MB (1,277,364 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 11:39:01 AM, Modified On Saturday, December 20, 2025, 11:39:01 AM, Accessed: Today, December 27, 2025, 5:22 PM (7 minutes ago). This photograph shows a still image of the original GoPro video recording, which was titled **GX010767** at the time of creation and filming. In the image, the video recording **GX010767** is paused at 0:01:36 (one minute and thirty-six seconds) and depicts numerous individuals leaning on the guardrails and handrails of the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010767** is paused at 0:01:36 (one minute and thirty-six seconds) and depicts one individual and a dog entirely blocking the entrance and pathway of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro video recording was created on December 5, 2025, at 1:55 PM. Please see attached.

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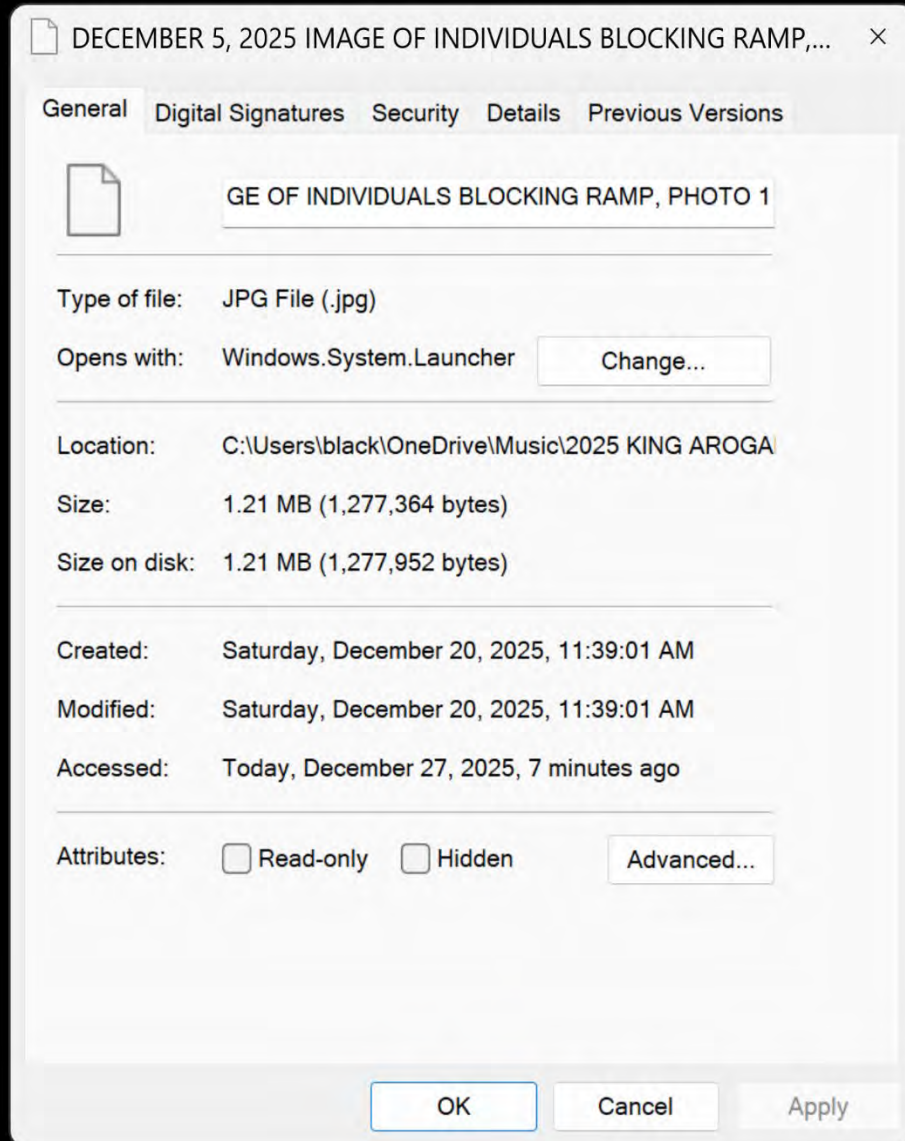
Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

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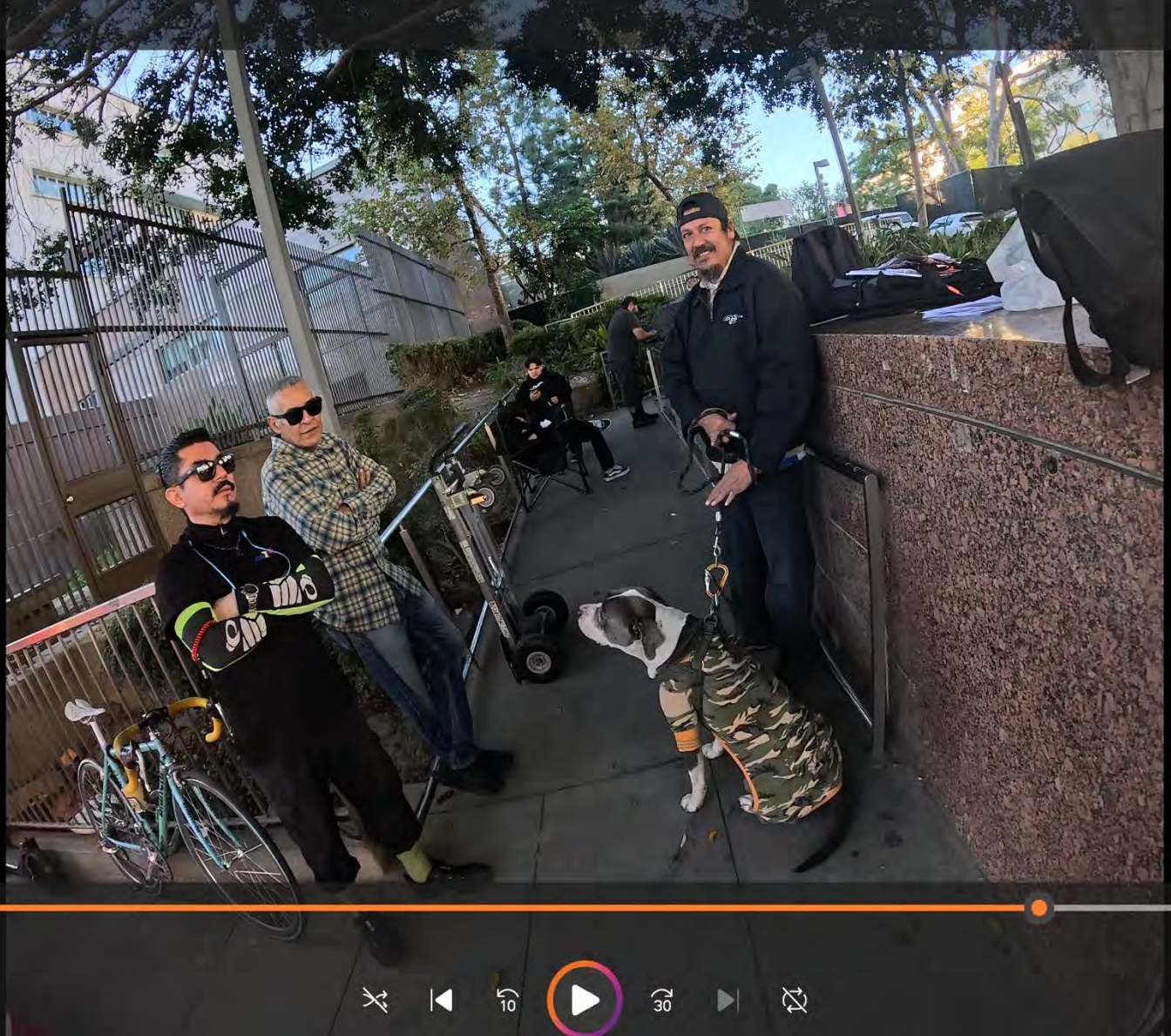
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Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

12. Attached hereto as **Exhibit 9** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010767**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 11:40:41 AM, Size: 1.29 MB (1,362,076 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 11:40:41 AM, Modified On Saturday, December 20, 2025, 11:40:41 AM, Accessed: Today, December 27, 2025, 5:53 PM (3 minutes ago). This photograph shows a still image of the original GoPro video recording, which was titled **GX010767** at the time of creation and filming. In the image, the video recording **GX010767** is paused at 0:01:38 (one minute and thirty-eight seconds) and depicts numerous individuals leaning on the guardrails and handrails of the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010767** is paused at 0:01:38 (one minute and thirty-eight seconds) and depicts numerous individuals, a metal cart, and a dog entirely blocking the entrance and pathway of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro video recording was created on December 5, 2025, at 1:55 PM. Please see attached.

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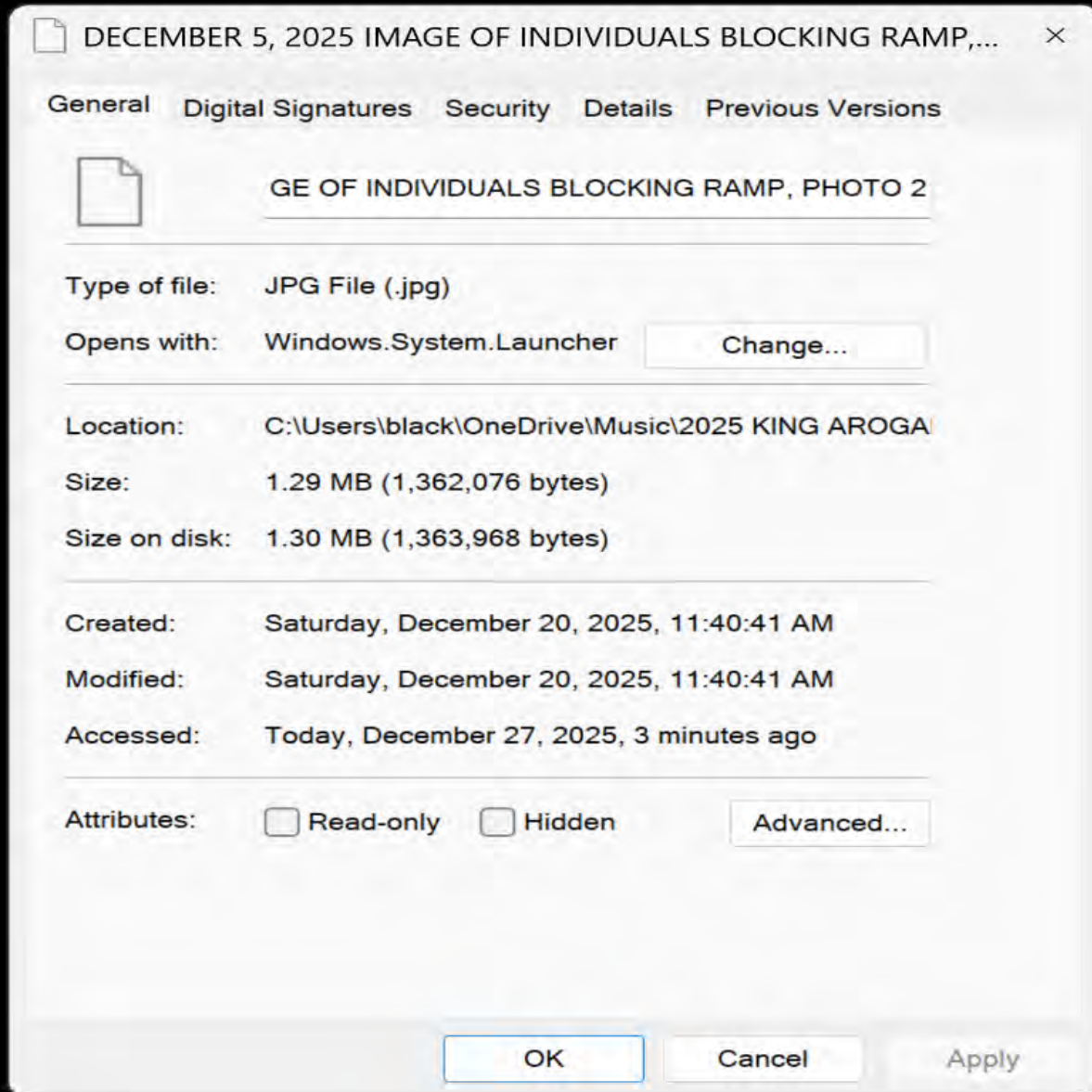
Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



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DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



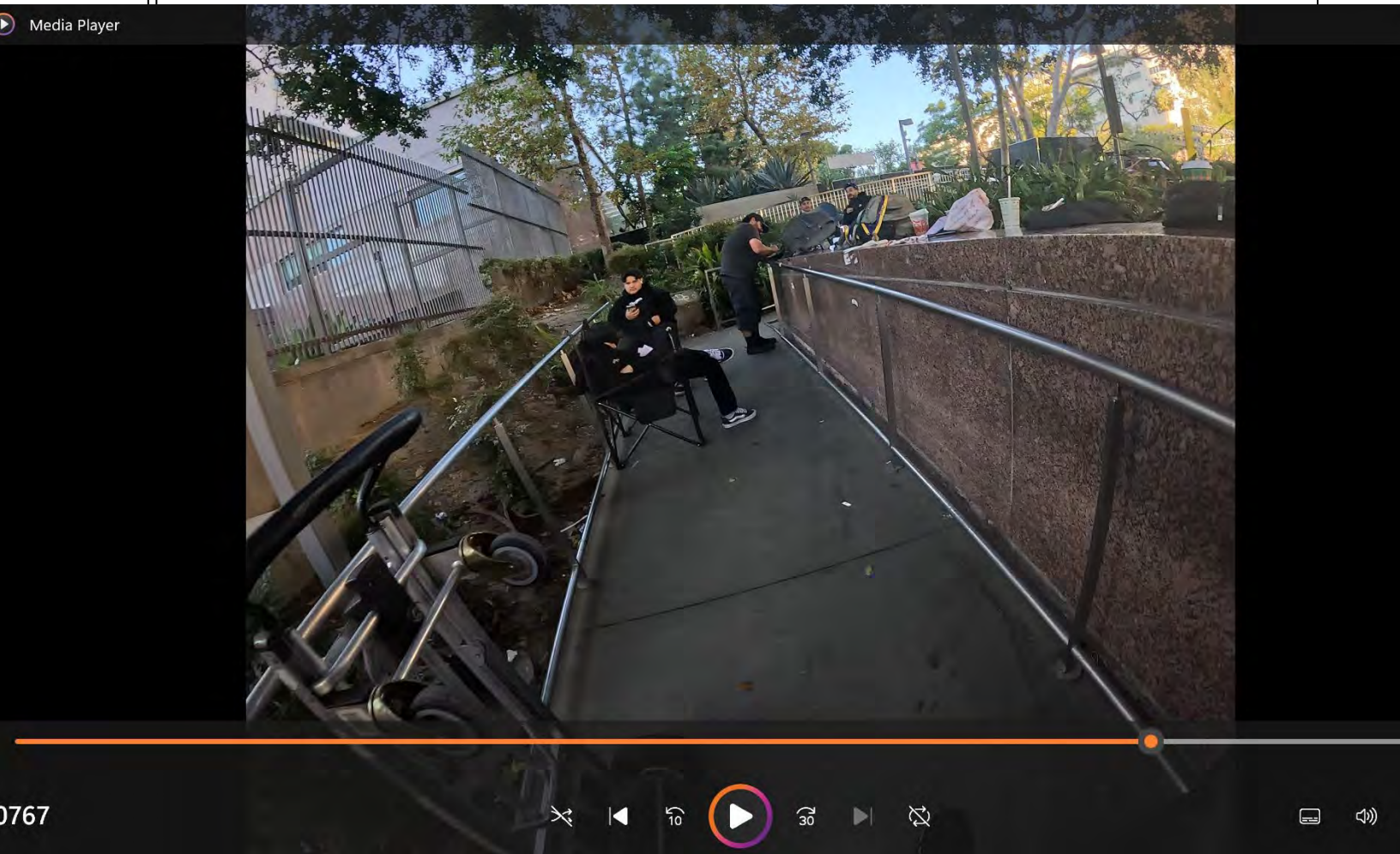
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Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

13. Attached hereto as **Exhibit 10** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010767**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 11:43:38 AM, Size: 1.05 MB (1,106,154 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 11:43:38 AM, Modified On Saturday, December 20, 2025, 11:43:39 AM, Accessed: Today, December 27, 2025, 6:24:18 PM. This photograph shows a still image of the original GoPro video recording, which was titled **GX010767** at the time of creation and filming. In the image, the video recording **GX010767** is paused at 0:01:40 (one minute and forty seconds) and depicts numerous individuals leaning on the guardrails and handrails of the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010767** is paused at 0:01:38 (one minute and thirty-eight seconds) and depicts numerous individuals, a metal cart, and a chair blocking the pathway of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012, almost entirely. The original GoPro video recording was created on December 5, 2025, at 1:55 PM. Please see attached.

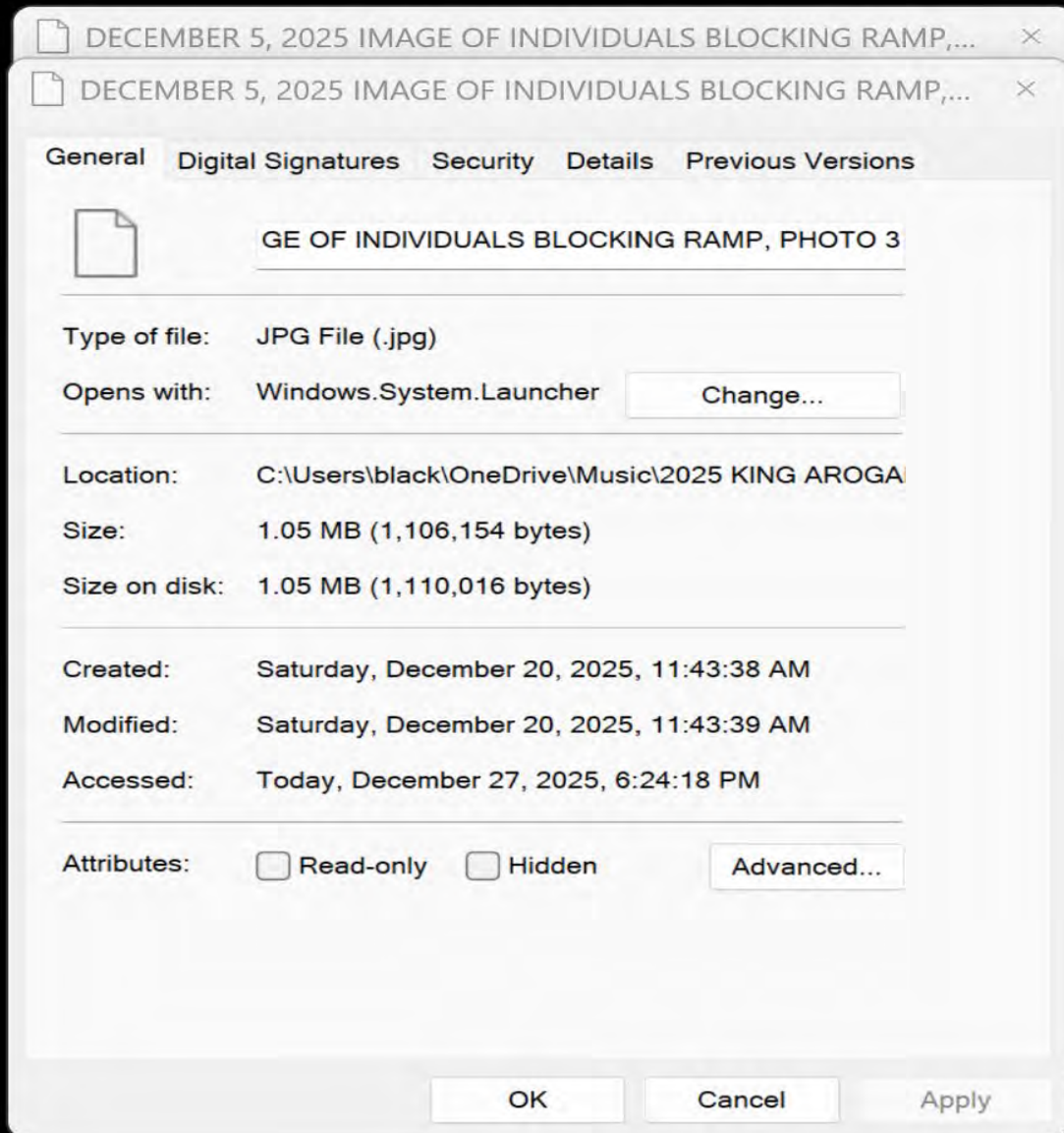
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

14. Attached hereto as **Exhibit 11** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010767**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 11:45:09 AM, Size: 1.03 MB (1,087,868 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 11:45:09 AM, Modified On Saturday, December 20, 2025, 11:45:09 AM, Accessed: Today, December 27, 2025, 7:08:11 PM. This photograph shows a still image of the original GoPro video recording, which was titled **GX010767** at the time of creation and filming. In the image, the video recording **GX010767** is paused at 0:01:42 (one minute and forty-two seconds) and depicts numerous individuals leaning on the guardrails and handrails of the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010767** is paused at 0:01:42 (one minute and forty-two seconds) and depicts numerous individuals and multiple chairs blocking the pathway of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012, almost entirely. The original GoPro video recording was created on December 5, 2025, at 1:55 PM. Please see attached.

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Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



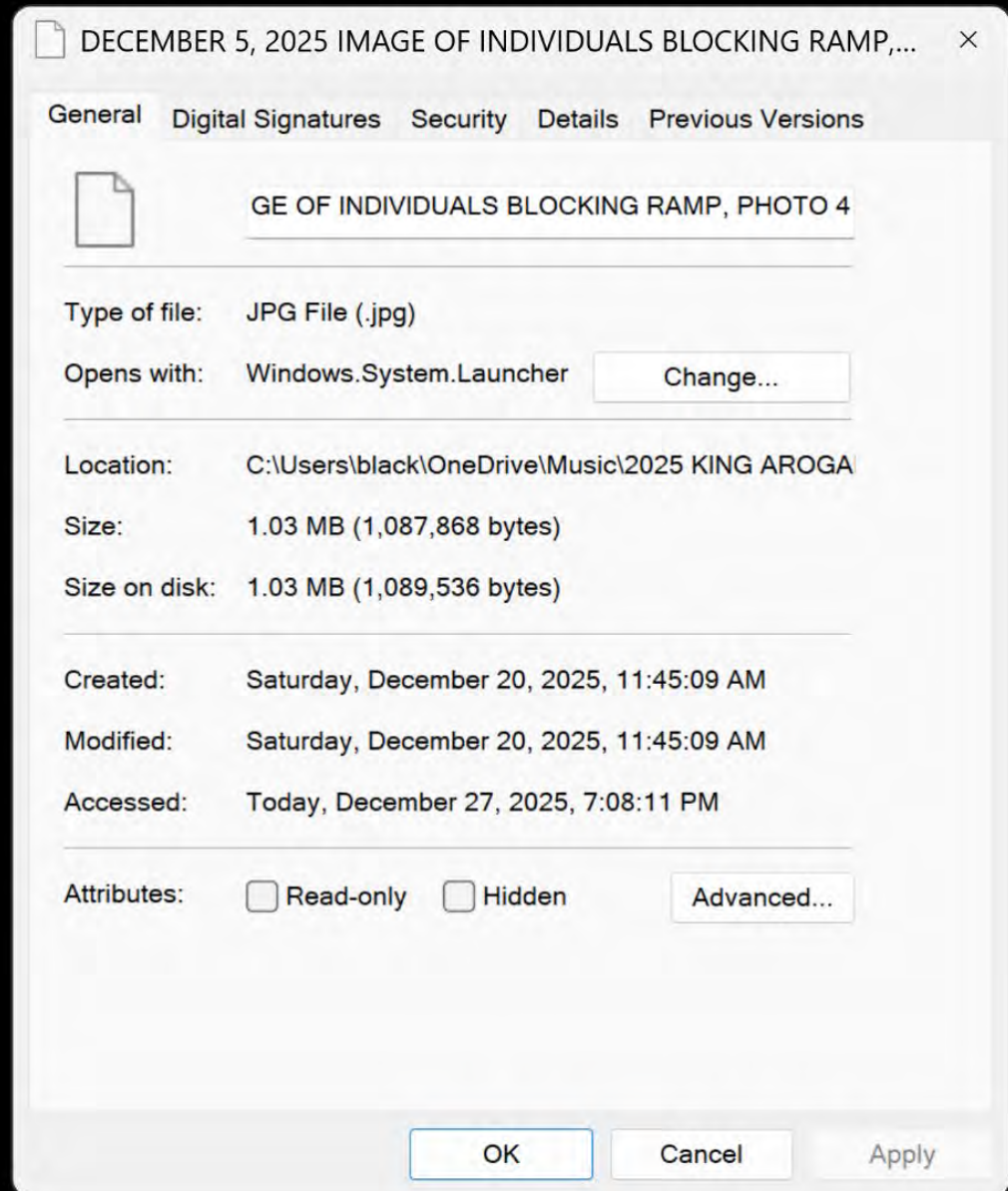
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR

473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408

Email: attorney@neilopdahl.com

Phone: 626.429.6578



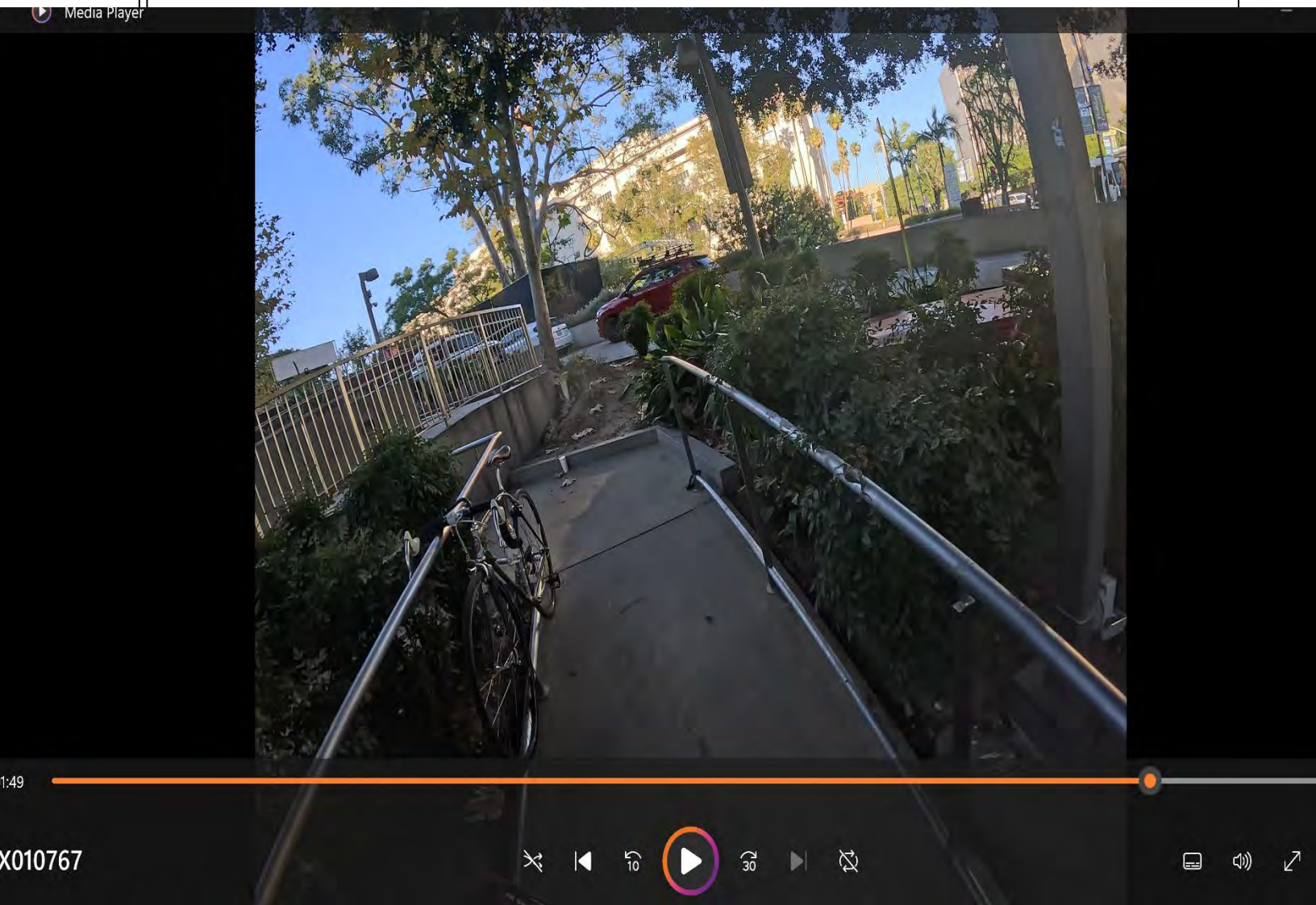
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

15. Attached hereto as **Exhibit 12** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010767**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 11:47:19 AM, Size: 1.04 MB (1,091,552 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 11:47:20 AM, Modified On Saturday, December 20, 2025, 11:47:20 AM, Accessed: Today, December 27, 2025, 7:20:10 PM. This photograph shows a still image of the original GoPro video recording, which was titled **GX010767** at the time of creation and filming. In the image, the video recording **GX010767** is paused at 0:01:49 (one minute and forty-nine seconds) and depicts a bicycle blocking guardrails and handrails of the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010767** is paused at 0:01:49 (one minute and forty-nine seconds) and depicts the pathway of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012 that leads to the second floor entrance of the courthouse. The original GoPro video recording was created on December 5, 2025, at 1:55 PM. Please see attached.

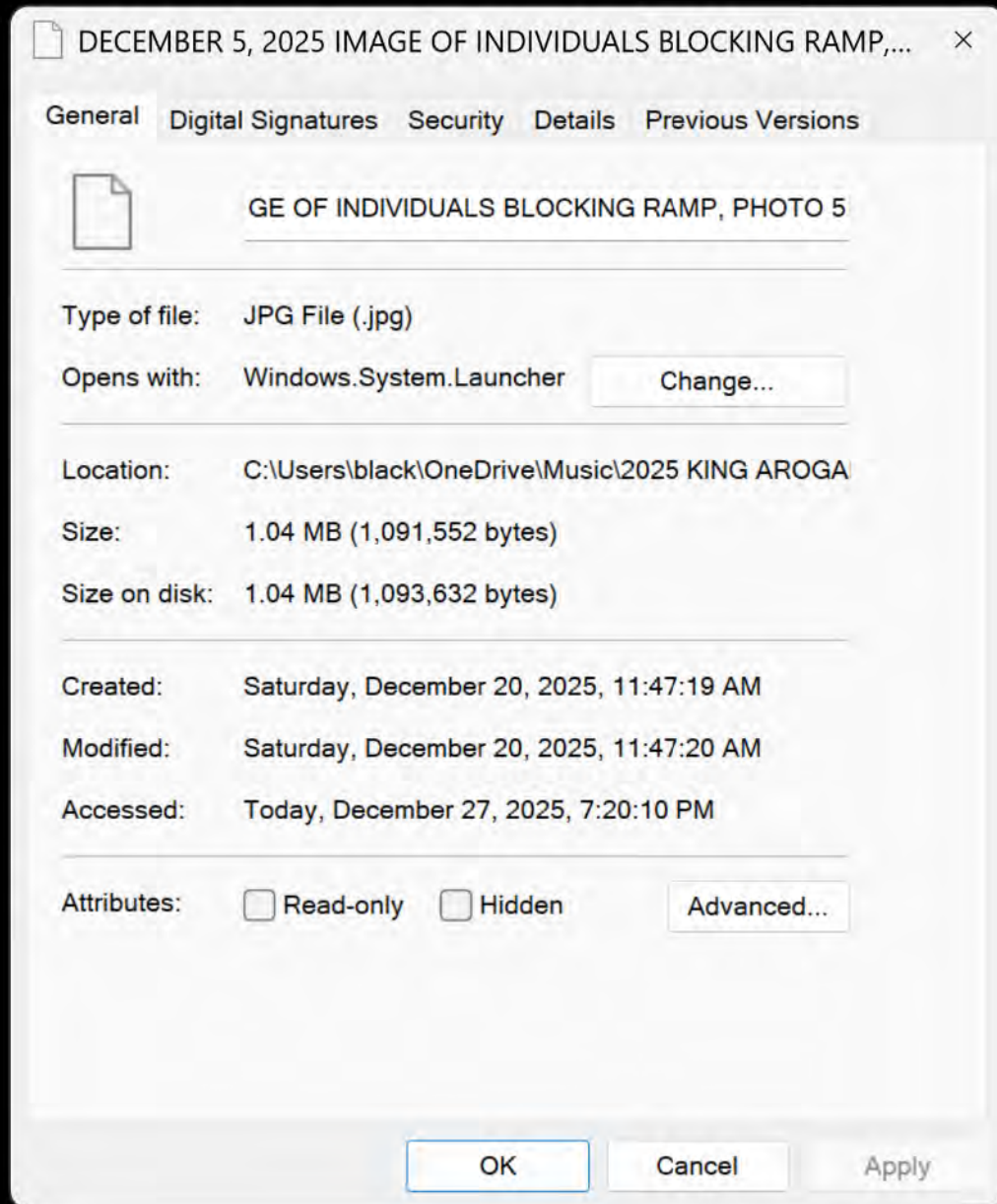
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Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



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Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
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Phone: 626.429.6578



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Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

16. Attached hereto as **Exhibit 13** is a true and correct digital copy of a photograph screenshot created on my desktop computer that was taken from a still video recording image created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010852**. This photograph was taken on my personal laptop, which I use for personal use on a daily basis. This photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application. Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify this photograph by attaching a screenshot of the hash values of the photograph taken. Date: December 20, 2025, 1:58:20 PM, Size: 1.47 MB (1,547,886 bytes), Path of Internal storage: Created On Saturday, December 20, 2025, 1:58:20 PM, Modified On Saturday, December 20, 2025, 1:58:20 PM, Accessed: Today, December 28, 2025, 8:13:37 AM. This photograph shows a still image of the original GoPro video recording, which was titled **GX010852** at the time of creation and filming. In the image, the video recording **GX010852** is paused at 0:01:50 (one minute and fifty seconds) and depicts a bicycle blocking guardrails and handrails of the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010852** is paused at 0:01:50 (one minute and fifty seconds) and depicts the pathway of the Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012 that leads to the second floor entrance of the courthouse. The original GoPro video recording was created on December 17, 2025, at 12:58 PM. Please see attached.

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Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

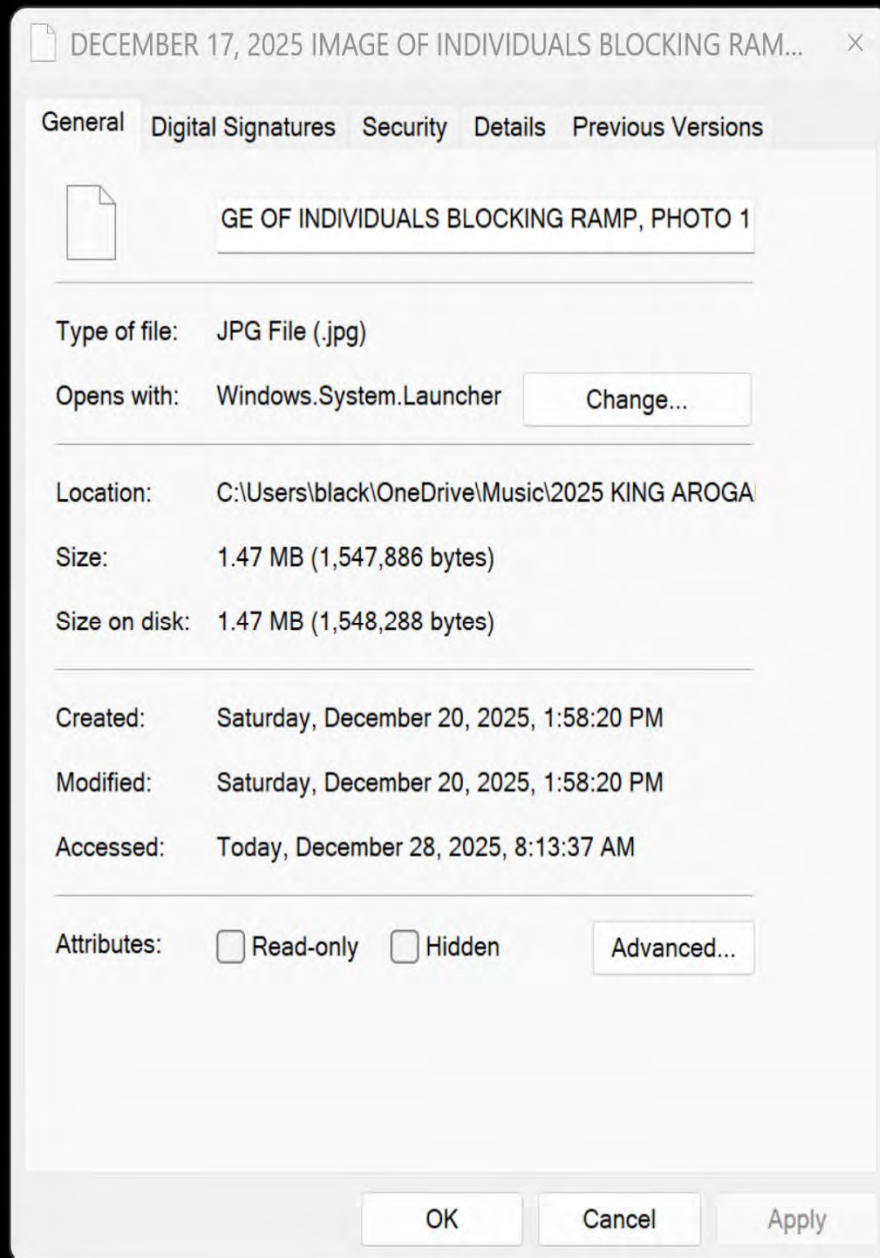
Media Player



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Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



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Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

17. Attached hereto as **Exhibit 14** is a true and correct digital copy of a photograph
screenshot created on my desktop computer that was taken from a still video recording image
created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010852**. This
photograph was taken on my personal laptop, which I use for personal use on a daily basis. This
photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.
Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify
this photograph by attaching a screenshot of the hash values of the photograph taken. Date:
December 20, 2025, 2:02:52 PM, Size: 1.50 MB (1,579,244 bytes), Path of Internal storage:
Created On Saturday, December 20, 2025, 2:02:52 PM, Modified On Saturday, December 20,
2025, 2:02:52 PM, Accessed: Today, December 28, 2025, 9:09:41 AM. This photograph shows
a still image of the original GoPro video recording, which was titled **GX010852** at the time of
creation and filming. In the image, the video recording **GX010852** is paused at 0:01:53 (one
minute and fifty-three seconds) and depicts a bicycle blocking guardrails and handrails of the
actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los
Angeles, CA 90012. In the image, the video recording **GX010852** is paused at 0:01:53 (one
minute and fifty-three seconds) and depicts the pathway of the Stanley Mosk Superior Court
outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012 that leads to the
second floor entrance of the courthouse. The original GoPro video recording was created on
December 17, 2025, at 12:58 PM. Please see attached.

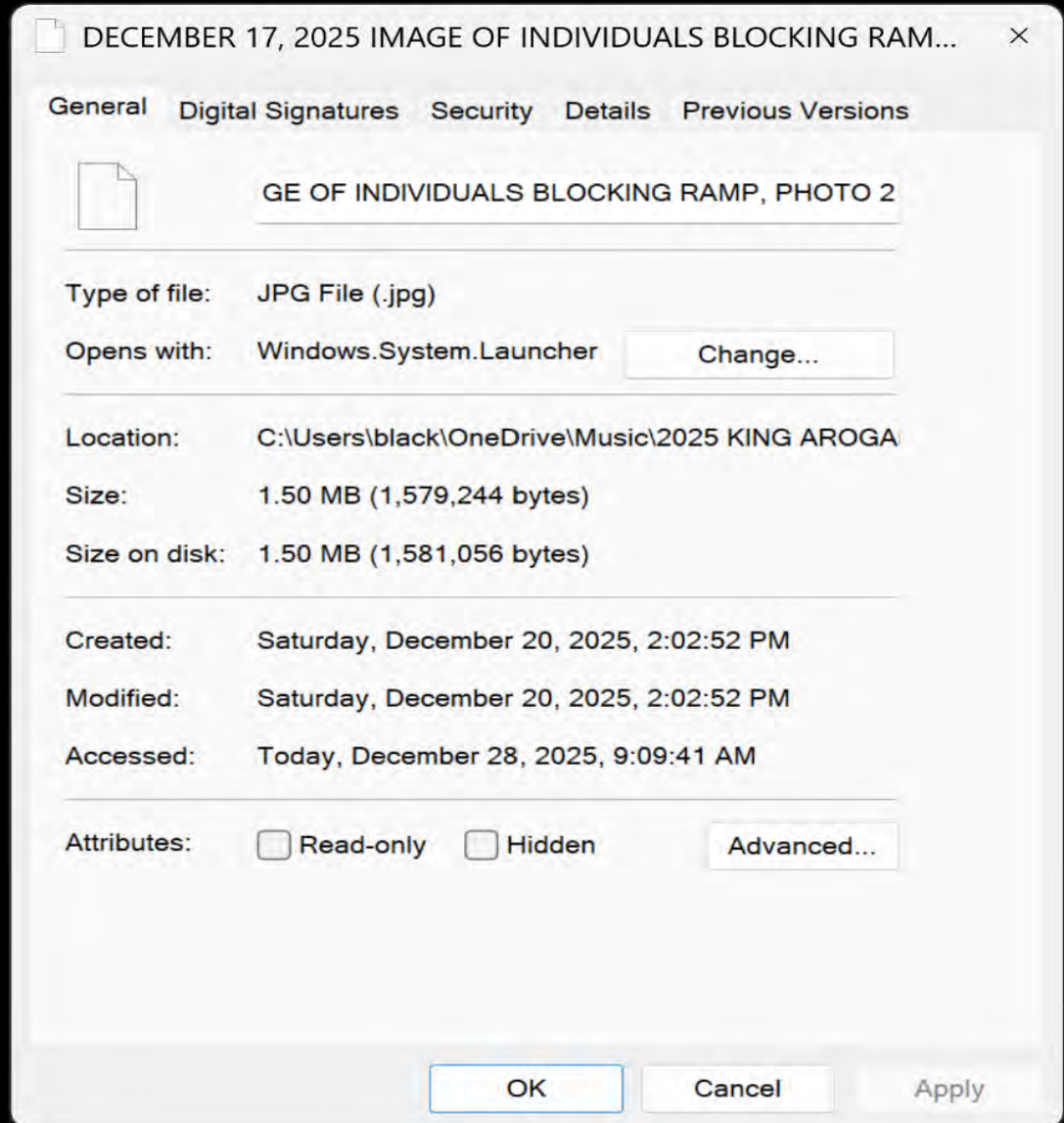
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

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Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



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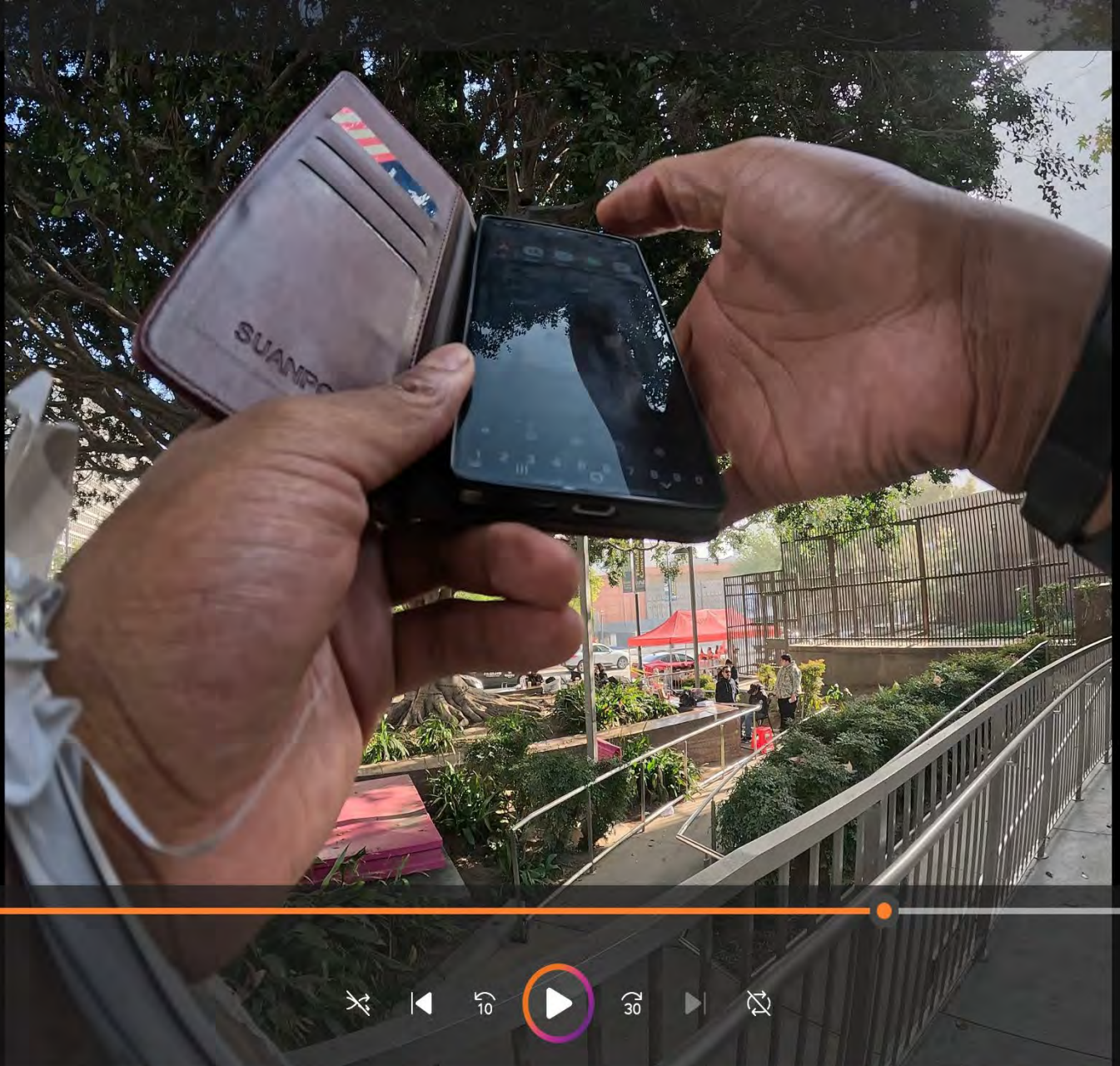
26 **DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

27
28
Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

18. Attached hereto as **Exhibit 15** is a true and correct digital copy of a photograph
screenshot created on my desktop computer that was taken from a still video recording image
created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010852**. This
photograph was taken on my personal laptop, which I use for personal use on a daily basis. This
photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.
Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify
this photograph by attaching a screenshot of the hash values of the photograph taken. Date:
December 22, 2025, 12:00:34 PM, Size: 1.14 MB (1,203,277 bytes), Path of Internal storage:
Created On Saturday, December 20, 2025, 12:00:35 PM, Modified On Saturday, December 20,
2025, 12:00:18 PM, Accessed: Today, December 28, 2025, 12:00:18 PM. This photograph
shows a still image of the original GoPro video recording, which was titled **GX010852** at the
time of creation and filming. In the image, the video recording **GX010852** is paused at 0:02:28
(two minutes and twenty-eight seconds) and depicts the pathway of the Stanley Mosk Superior
Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012 that leads
to the second floor entrance of the courthouse being blocked by numerous individuals and
chairs. The original GoPro video recording was created on December 17, 2025, at 12:58 PM.
Please see attached.

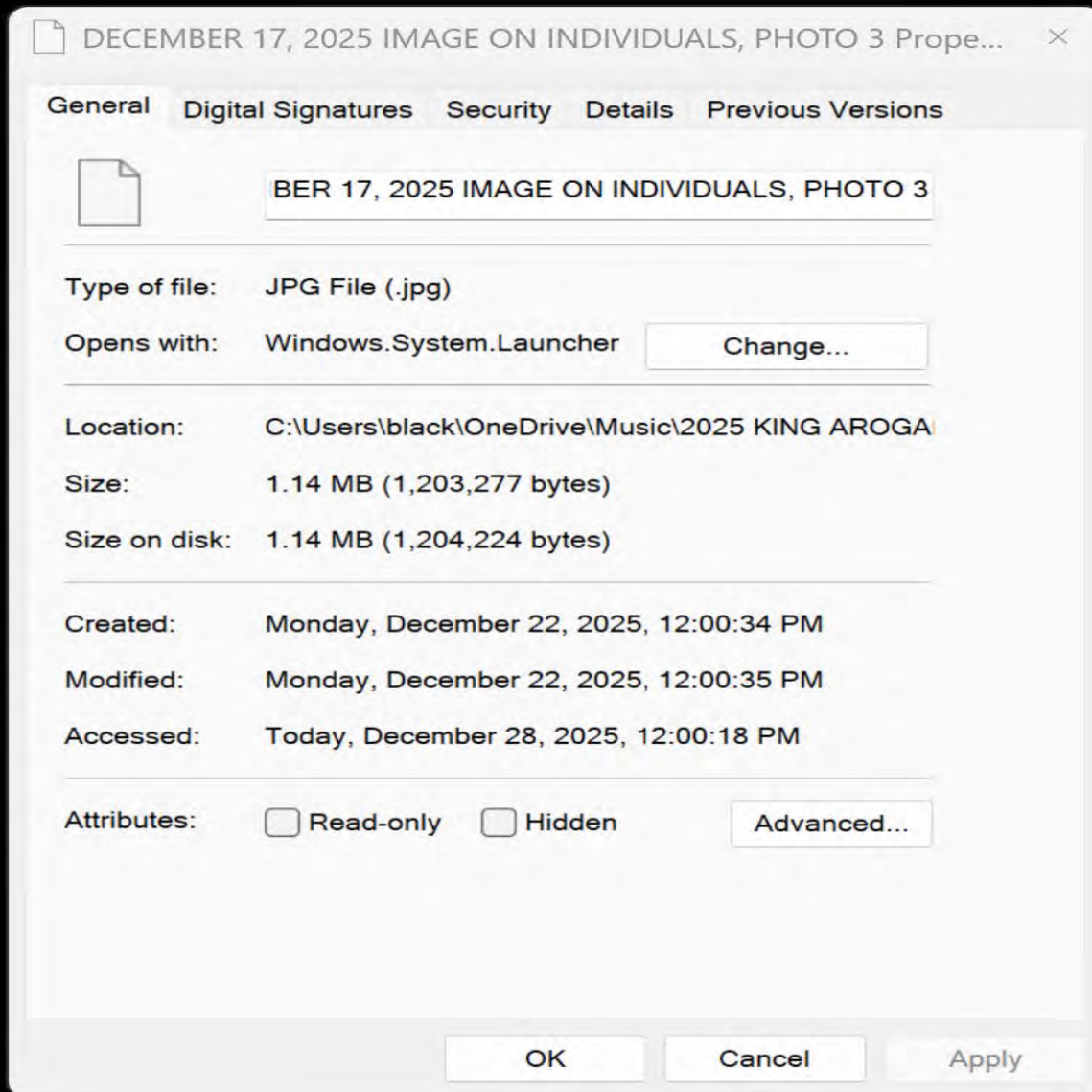
DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



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Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578



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Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

1 **I declare under penalty of perjury under the laws of California and the United**
2 **States that the foregoing is true and correct.**

3
4 **DATE: December 28, 2025**

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7 *Arogant Hollywood*
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26 **DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

27
28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

VERIFICATION OF PLAINTIFF ALISON HELEN FAIRCHILD

United States of America

State of California

City of Loma Linda, California, Within the County of San Bernardino

I, **ALISON HELEN FAIRCHILD**, being duly sworn, say:

I, **ALISON HELEN FAIRCHILD**, am the Plaintiff in the above-entitled action and proceeding.

1. I have read the foregoing:

APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFF'S ORIGINAL CIVIL RIGHTS COMPLAINT; DECLARATION OF AROGANT HOLLYWOOD, ADMISSIBILITY, SELF-AUTHENTICATION, & CERTIFICATION OF ATTACHED DOCUMENTS BY AROGANT HOLLYWOOD PURSUANT TO FEDERAL RULES OF EVIDENCE RULES 401, 402, 803, 807, 902, 1001-1008 CERTIFICATION & AUTHENTICATION OF ALL SUBMITTED EXHIBITS

and know the contents thereof. The facts stated therein are true and within my personal knowledge, [except as to those matters which are therein alleged on information and belief, and as to those matters, I believe them to be true], and if called upon to testify, I would competently testify as to the matters stated herein.

VERIFICATION BY ALISON HELEN FAIRCHILD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

2. I am a Plaintiff in the present case and a citizen of the United States of America.

3. My civil rights are protected under Title II and Title III of the Americans with Disabilities Act of 1990, the Unruh Civil Rights Act of 1959, and the California Disabled Persons Act of 1968 because I am disabled and cannot walk whatsoever without the assistance of a manual wheelchair.

4. I have personal knowledge of myself, my activities, and my intentions, including those set out in the foregoing **Verified Appendix of Exhibits, Original Civil Rights Complaint, and Request for Injunctive Relief.**

5. I verify under the penalty of perjury under the laws of the United States that the factual statements in the foregoing Verified Appendix of Exhibits, Original Civil Rights Complaint, and Request for Injunctive Relief concerning myself, my activities, and my intentions are true and correct, as are the factual statements concerning the County of Los Angeles and private party Defendants Tatianna Simoes-Silva, Jose Flores, Rapid Legal, InfoTrack US, Inc., Nationwide Legal LLC, & DOES 1-10 repeatedly allowing individuals to block my path on a Stanley Mosk Superior Court outside handicap ramp I needed to use for exercise while at the courthouse and I needed to use to safely arrive at the Stanley Mosk Superior Courthouse's second floor entrance.

VERIFICATION BY ALISON HELEN FAIRCHILD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

1 I declare under penalty of perjury under the laws and Constitution of California
2 and the United States that every word, sentence, paragraph, video recording, sound,
3 image, photograph, and page of this First Verified Appendix of Exhibits is true and
4 correct.

5
6 **DATE: December 28, 2025**

7
8 
9

10
11 **ALISON HELEN FAIRCHILD**
12 **1308 East Colorado Blvd.**
13 **Pasadena, CA 91106**
14 **Mobile: (626) 755-6442**
15 Email: fairchildadacrusader@gmail.com

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26 **VERIFICATION BY ALISON HELEN FAIRCHILD**

27
28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**
Major, USMCR
473 E. Carnegie Drive, Suite 200
San Bernardino, CA 92408
Email: attorney@neilopdahl.com
Phone: 626.429.6578

CERTIFICATE OF SERVICE

I certify that on December 28, 2025, I served one copy of the foregoing:

APPENDIX OF EXHIBITS IN SUPPORT OF PLAINTIFF’S ORIGINAL CIVIL RIGHTS COMPLAINT; DECLARATION OF AROGANT HOLLYWOOD, ADMISSIBILITY, SELF-AUTHENTICATION, & CERTIFICATION OF ATTACHED DOCUMENTS BY AROGANT HOLLYWOOD PURSUANT TO FEDERAL RULES OF EVIDENCE RULES 401, 402, 803, 807, 902, 1001-1008 CERTIFICATION & AUTHENTICATION OF ALL SUBMITTED EXHIBITS

and all attachments by electronic mail to the following email addresses:

Sheriff Robert G. Luna,	<u>rluna@lasd.org</u>
Hilda Lucia Solis,	<u>firstdistrict@bos.lacounty.gov</u>
Shawn Kehoe,	<u>skehoe@lasd.org</u>
Gerardo Valdivia,	<u>gvaldivia@lasd.org</u>
Francisco Garibay	<u>fgaribay@bos.lacounty.gov</u>
Nicole Amber Davis-Tinkham	<u>ndavis-tinkham@counsel.lacounty.gov</u> <u>nikki.davis1212@gmail.com</u>
Holly J. Mitchell	<u>hollyjmitchell@bos.lacounty.gov</u>
Deni K. Butler	<u>dbutler@lasuperiorcourt.org</u>
David Nill	<u>dsn@rapidlegal.com</u>
Nationwide Legal LLC	<u>legal@nationwidelegal.com</u>
InfoTrack US, Inc.	<u>help@infotrack.com</u>

1 Electronic service of this federal district court pleading upon the above-stated unserved
2 Defendants was done as a courtesy, and counsel was under no obligation to serve Defendants
3 who have yet to receive a copy of Fairchild's summons and complaint.
4

5 **I declare under penalty of perjury under the laws and Constitution of California**
6 **and the United States that the foregoing is true and correct.**
7

8 **Executed on December 28, 2025, in Los Angeles County, California**
9

10
11 **DATE: December 28, 2025**
12



14 BY:

15 *Neil E. Opdahl-Lopez, Esq. (SBN # 277596)*
16 *Major, USMCR*
17 **San Bernardino, CA 92408**
18 Mobile: 626.429.6578
19 Facsimile: 888.298.7284
20 attorney@neilopdahl.com
21
22
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26
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28

1 ***Neil Opdahl-Lopez, Esq. (SBN # 277596)***

2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

9
10 ***Alison Helen Fairchild v. Hilda Lucia Solis, et al***

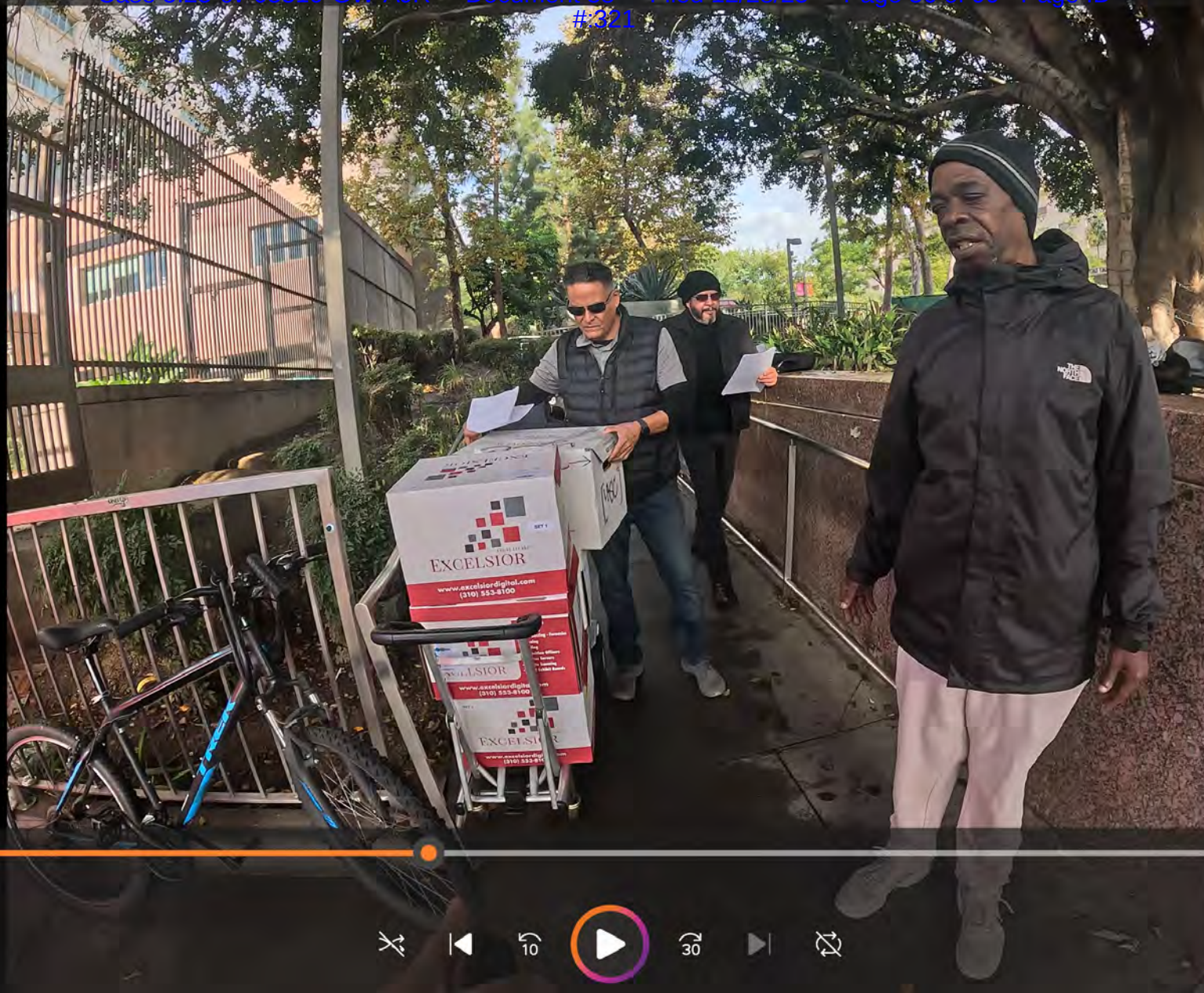
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15 **Case No. 5:25-cv-03510-GHW(AJR)**

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EXHIBIT 1



Media Player



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#322



1 ***Neil Opdahl-Lopez, Esq. (SBN # 277596)***

2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

9
10 ***Alison Helen Fairchild v. Hilda Lucia Solis, et al***

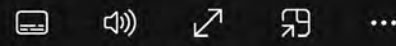
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15 **Case No. 5:25-cv-03510-GHW(AJR)**



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#325



1 ***Neil Opdahl-Lopez, Esq. (SBN # 277596)***

2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

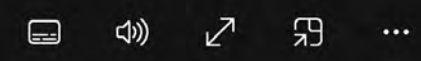
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10 ***Alison Helen Fairchild v. Hilda Lucia Solis, et al***

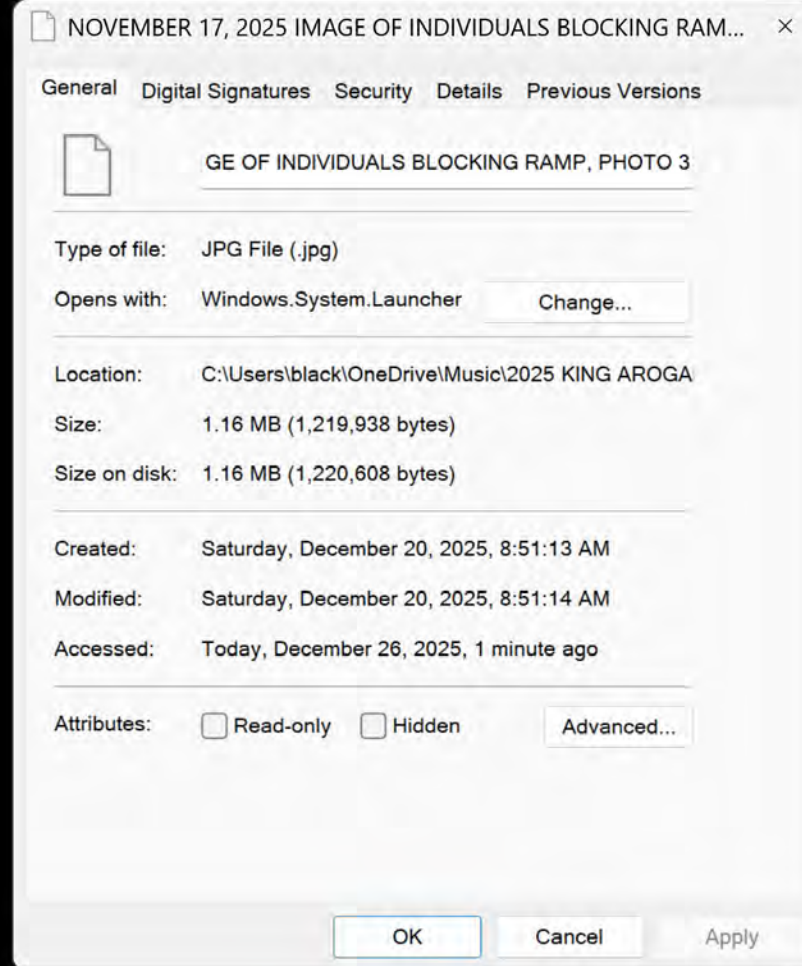
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15 **Case No. 5:25-cv-03510-GHW(AJR)**



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1 ***Neil Opdahl-Lopez, Esq. (SBN # 277596)***

2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

9
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15 **Case No. 5:25-cv-03510-GHW(AJR)**

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EXHIBIT 4



Media Player

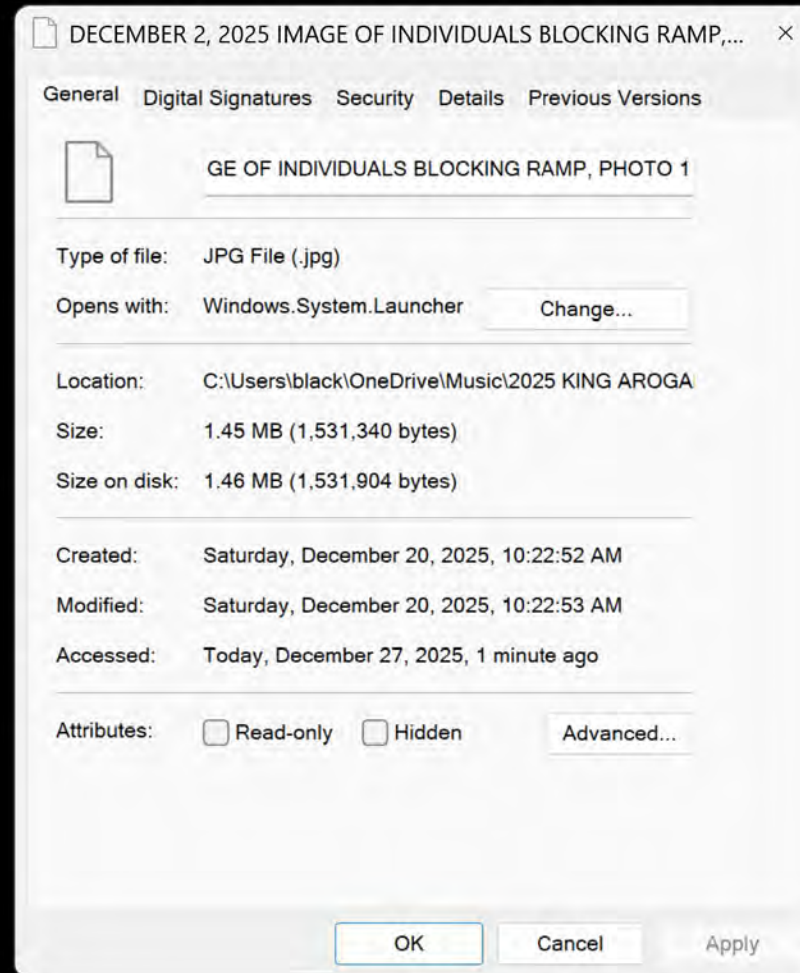


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1 ***Neil Opdahl-Lopez, Esq. (SBN # 277596)***

2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

9
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15 **Case No. 5:25-cv-03510-GHW(AJR)**

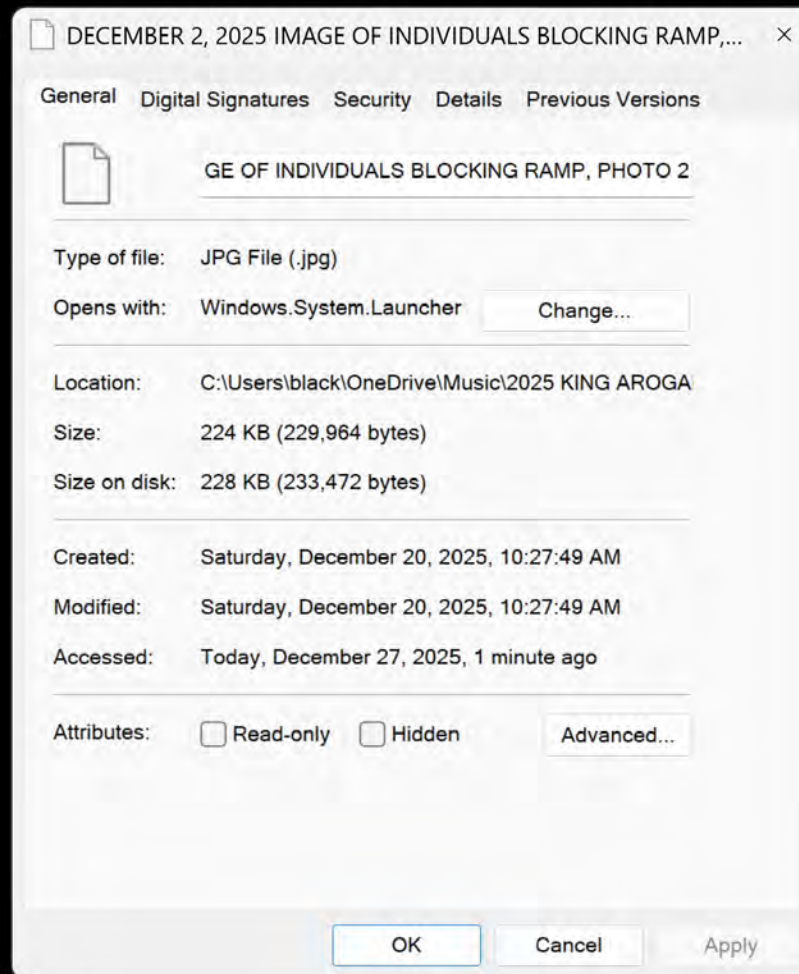


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1 ***Neil Opdahl-Lopez, Esq. (SBN # 277596)***

2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

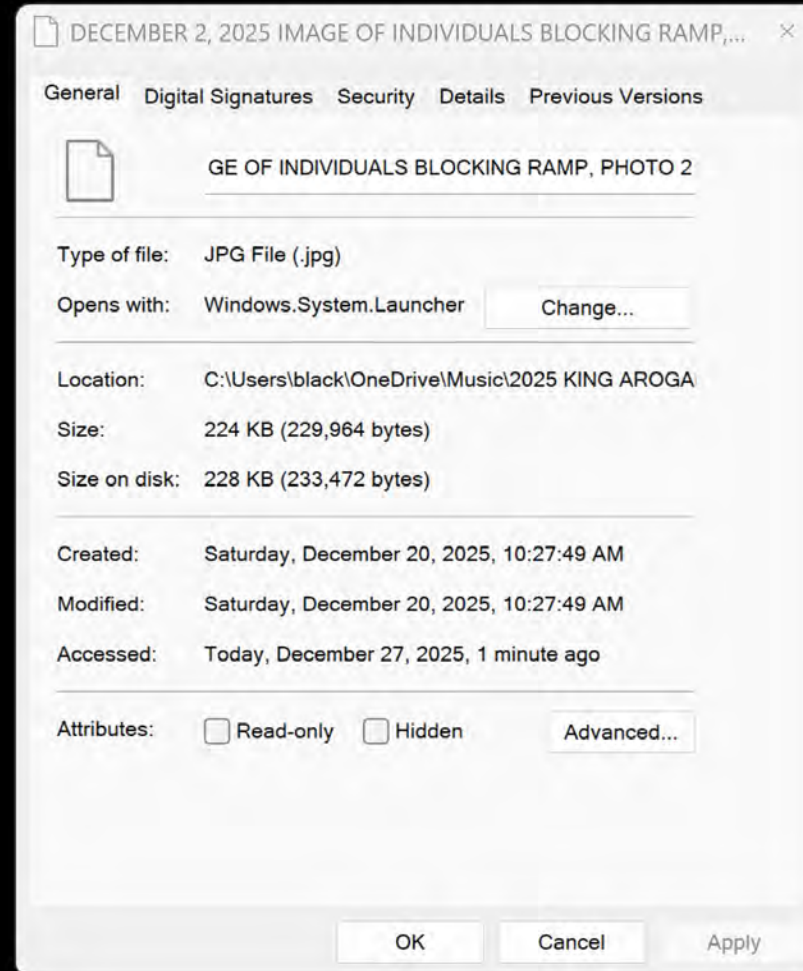
7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

9
10 ***Alison Helen Fairchild v. Hilda Lucia Solis, et al***

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15 **Case No. 5:25-cv-03510-GHW(AJR)**





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3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

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6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

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10 ***Alison Helen Fairchild v. Hilda Lucia Solis, et al***

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15 **Case No. 5:25-cv-03510-GHW(AJR)**

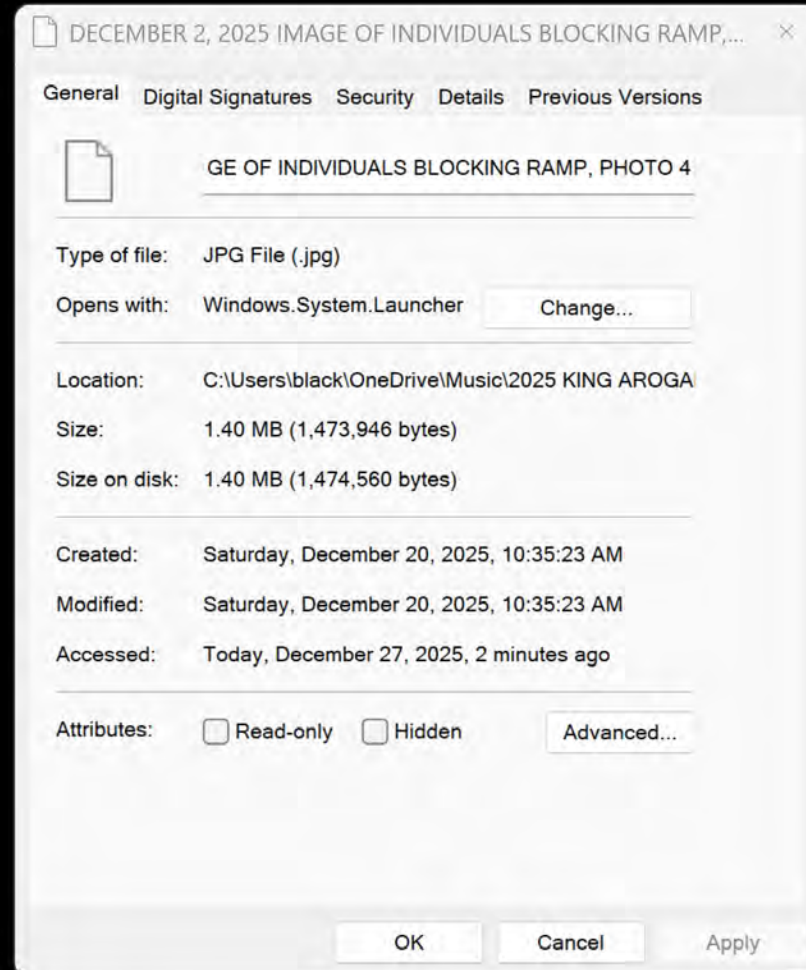


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GX010744





1 ***Neil Opdahl-Lopez, Esq. (SBN # 277596)***

2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

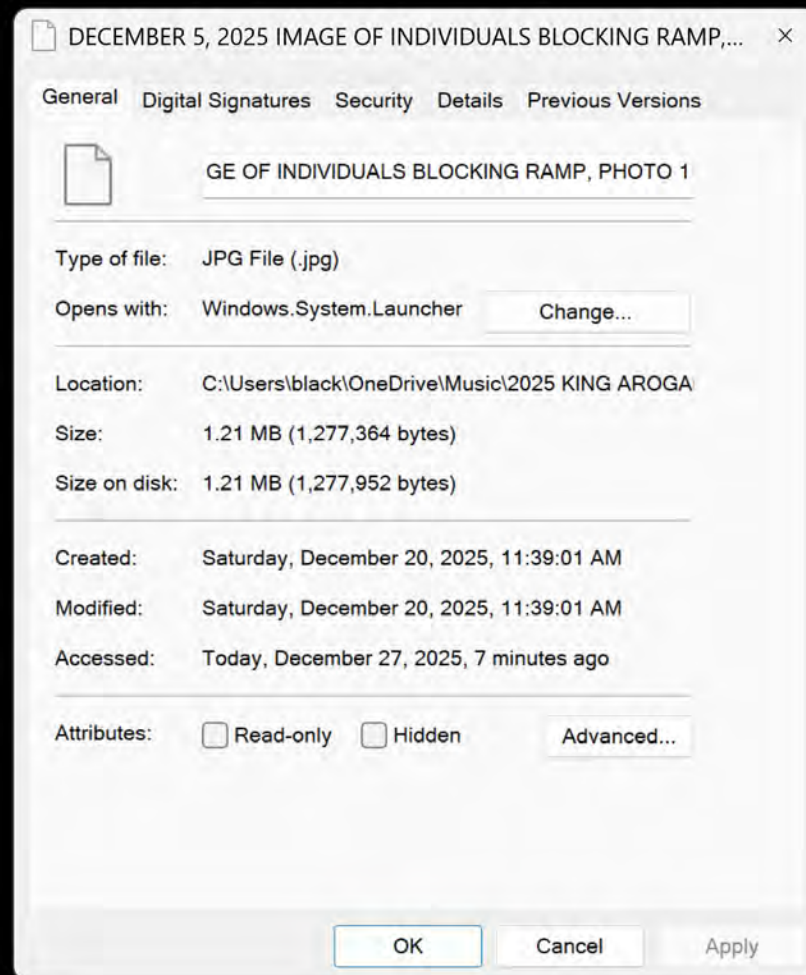
7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

9
10 ***Alison Helen Fairchild v. Hilda Lucia Solis, et al***

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15 **Case No. 5:25-cv-03510-GHW(AJR)**





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3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

9
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11 ***Alison Helen Fairchild v. Hilda Lucia Solis, et al***

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15 **Case No. 5:25-cv-03510-GHW(AJR)**

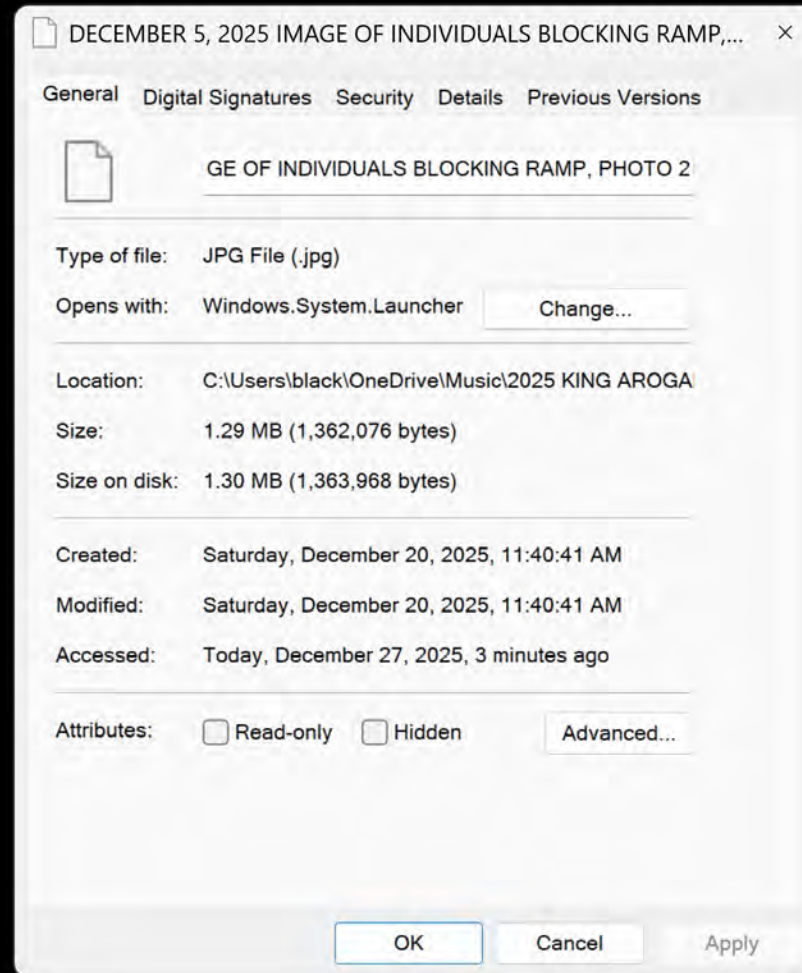


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1 ***Neil Opdahl-Lopez, Esq. (SBN # 277596)***

2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

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15 **Case No. 5:25-cv-03510-GHW(AJR)**

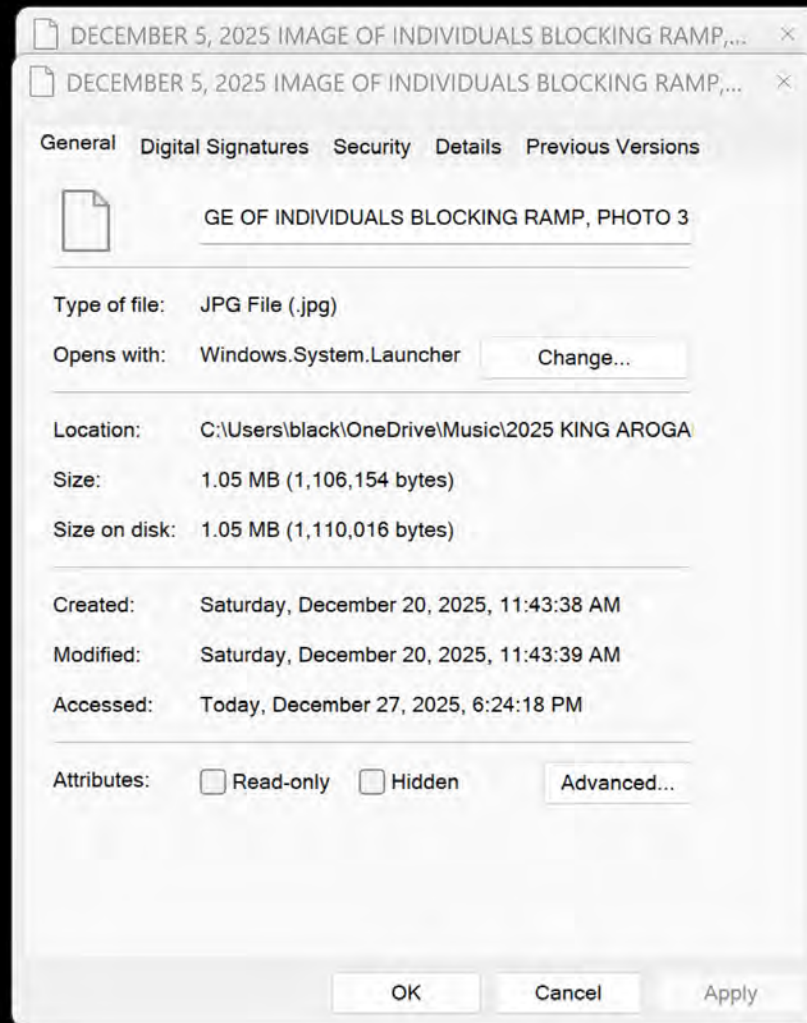


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1 ***Neil Opdahl-Lopez, Esq. (SBN # 277596)***

2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

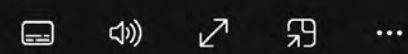
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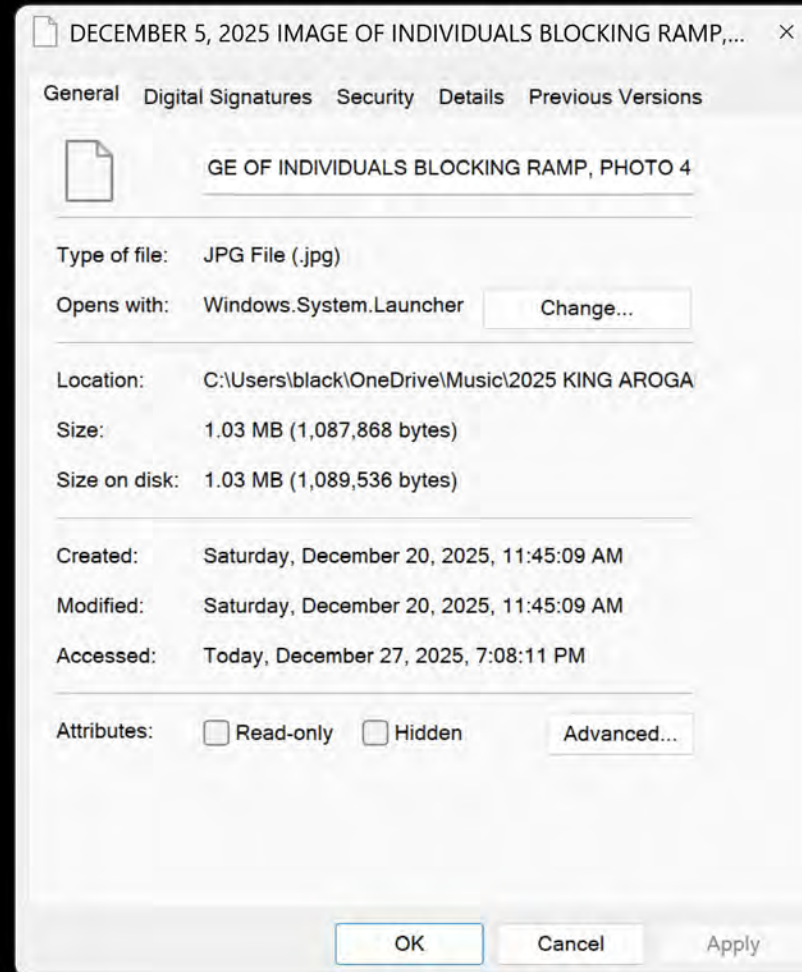
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15 **Case No. 5:25-cv-03510-GHW(AJR)**



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2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

9
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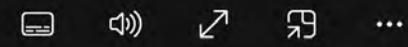
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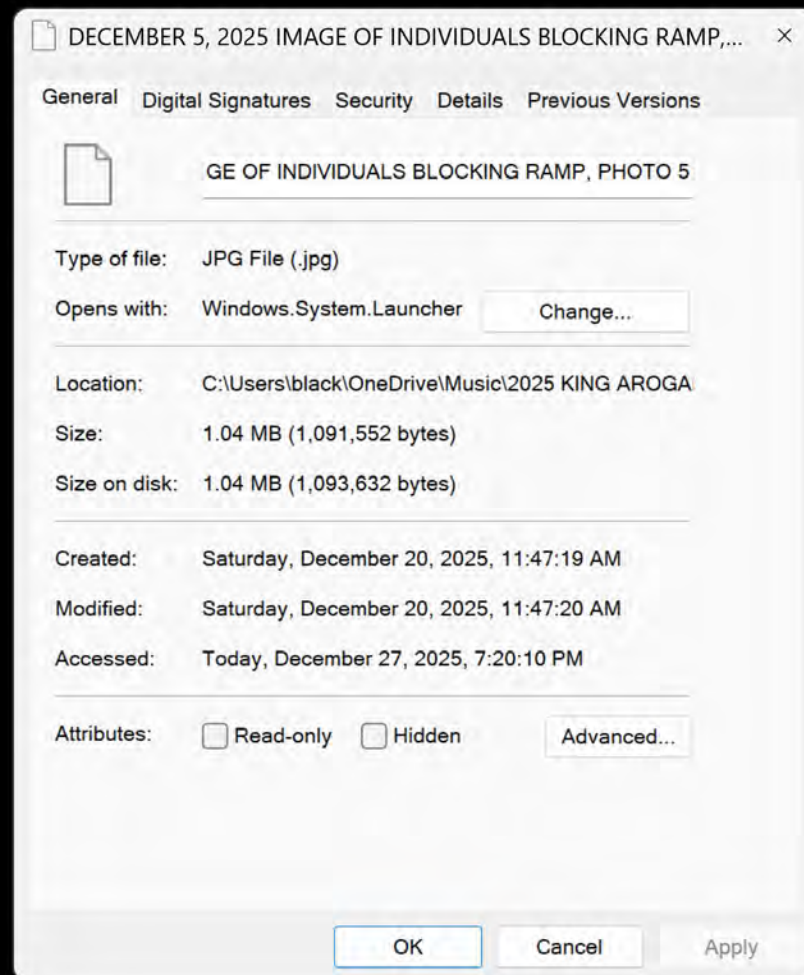


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1 ***Neil Opdahl-Lopez, Esq. (SBN # 277596)***

2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

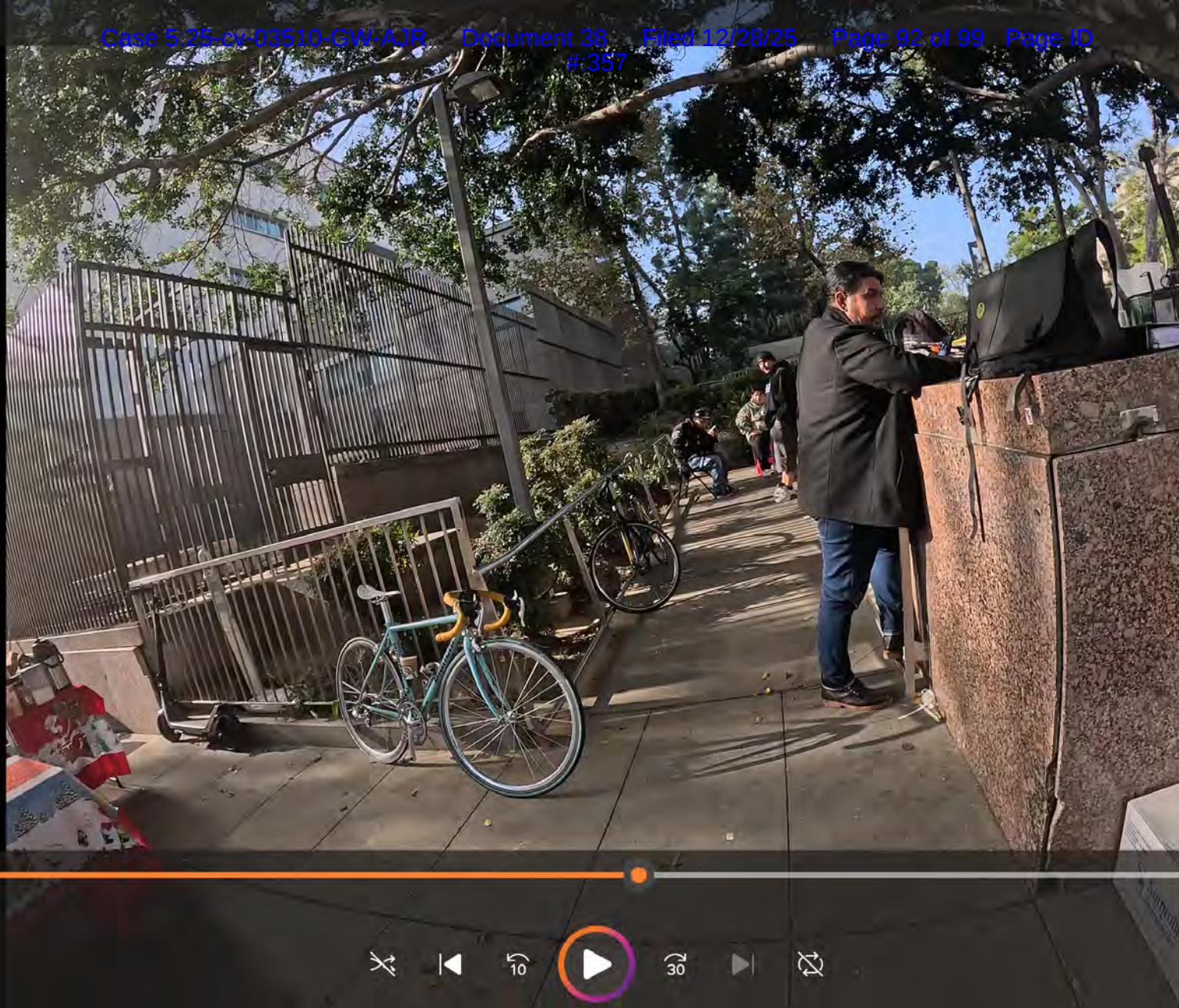
6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

9
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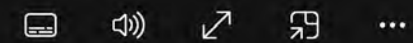
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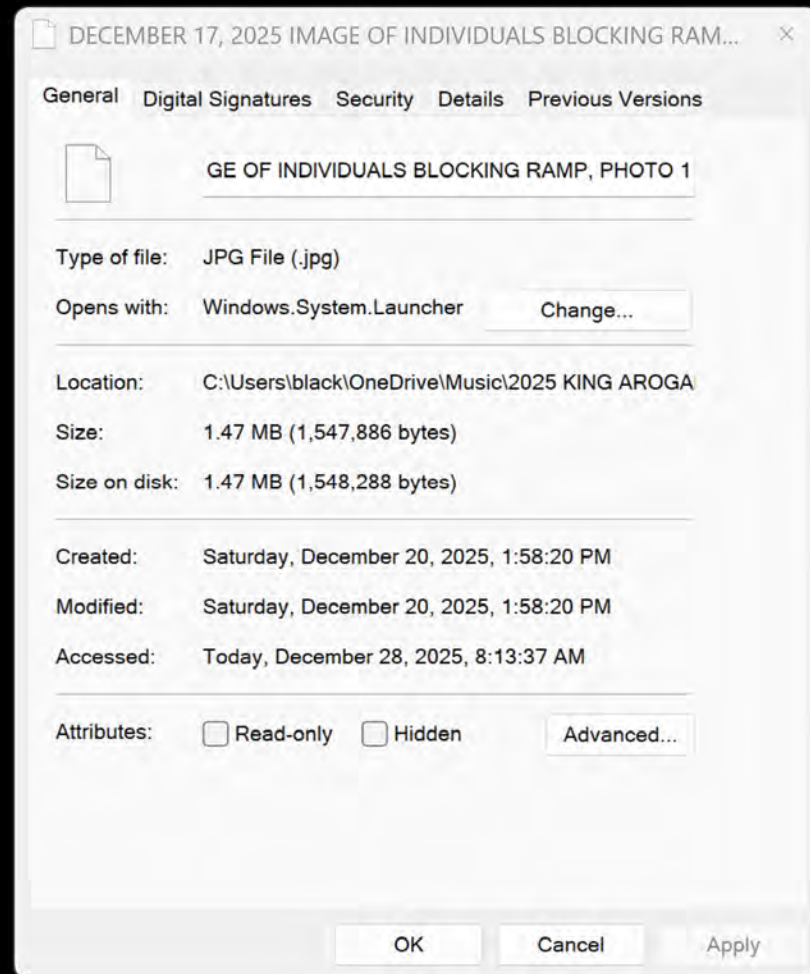


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1 ***Neil Opdahl-Lopez, Esq. (SBN # 277596)***

2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

9
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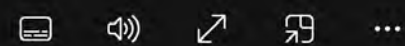
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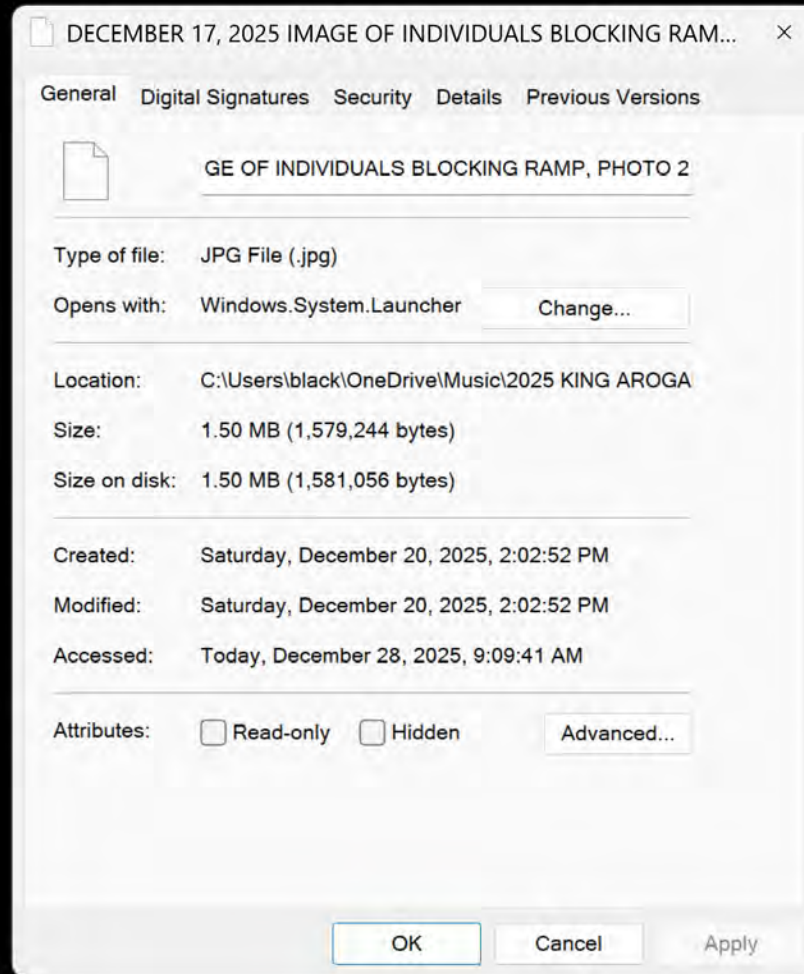


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1 ***Neil Opdahl-Lopez, Esq. (SBN # 277596)***

2 ***Major, USMCR***

3 ***473 E. Carnegie Drive, # 200***

4 ***San Bernardino, CA 92408***

5 Mobile: 626.429.6578

6 Facsimile: 888.298.7284

7 **attorney@neilopdahl.com**

8 **Attorney for Plaintiff**

9
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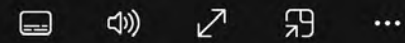
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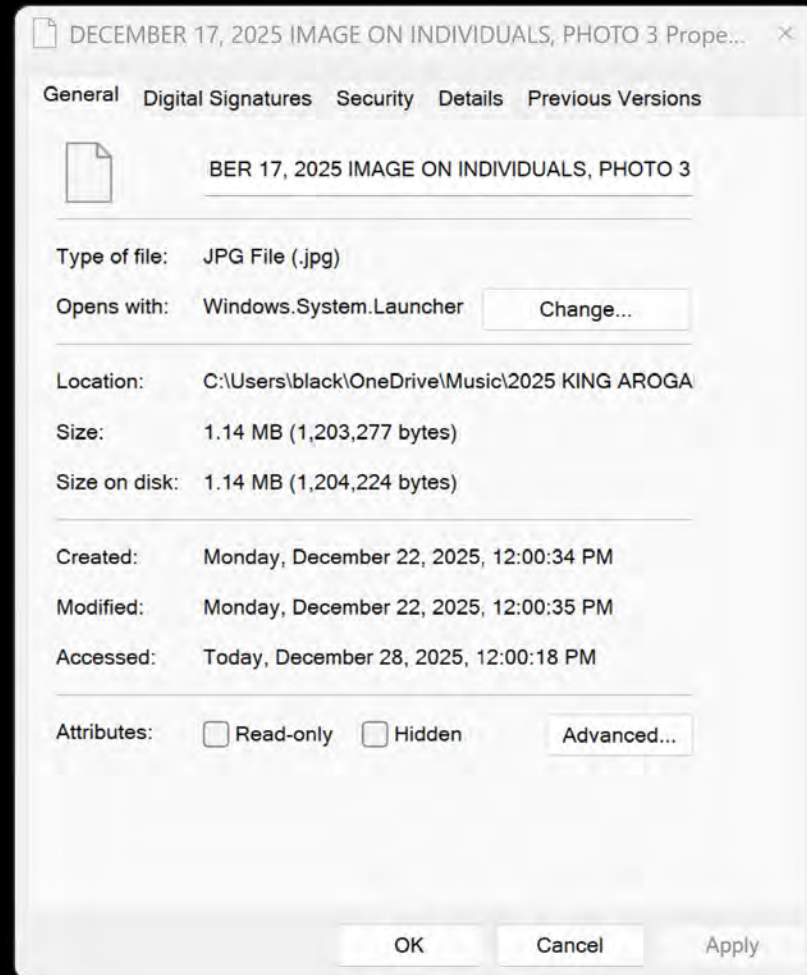


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Subject: General Public Comment – Rent Price-Gouging Restrictions

Dear Supervisors,

I am a Los Angeles County property owner writing regarding the ongoing rent price-gouging and HUD-based pricing restrictions that remain in effect following the January 2025 wildfire emergency.

While I understand and supported the intent of these protections at the height of the emergency, market conditions have materially changed over the past year. Housing inventory has increased significantly, and many property owners are now experiencing difficulty renting units due to rigid pricing caps that no longer reflect current market realities.

As we pass the one-year anniversary of the emergency and approach the current January 2026 expiration date, I respectfully urge the Board to review whether these restrictions remain necessary in their current form, and to consider modifying or ending them to allow for a more balanced and functional rental market.

Many responsible property owners are facing financial hardship and prolonged vacancies under the current framework. A timely, data-driven reassessment would benefit both renters and housing providers alike.

I have made multiple good-faith attempts over recent months to raise this issue, including delivering written correspondence in person, sending multiple follow-up emails, and submitting letters via certified mail, and I would appreciate guidance on how property owners can meaningfully engage in this policy discussion going forward.

I respectfully request that the Board schedule a public discussion or hearing on this issue before any further extensions are considered.

Thank you for your time and consideration.

Concerned property owner.