



**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	<p>I AM A CITIZEN RESIDENT CONSTIUEANT 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 , OSTEEN 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</p>

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 BUIINESSS 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 justification 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>
	<b>Other</b>	<p><b>ALISON H FAIRCHILD</b></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=x88IO3C5alqyknGR](https://youtu.be/TV_SVbeCGmQ?si=x88IO3C5alqyknGR)

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](https://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](https://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](https://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](https://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> <ul style="list-style-type: none"> <li>*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.</li> <li>*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.</li> <li>*Fix the structural oversight by ensuring future charter amendments undergo a comprehensive legal compatibility review before being brought to voters.</li> <li>*Ensure the monitary 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.</li> <li>*Call in poor policy-making practices by establishing a transparent, community-informed process to prevent similar governance failures in the future.</li> </ul> <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. 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 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</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>
		<b>Item Total</b>	<b>7</b>
<b>Grand Total</b>			<b>7</b>

1 **ALISON HELEN FAIRCHILD**  
2 **1308 EAST COLORADO BLVD.**  
3 **PASADENA, CA 91106**  
4 **Mobile: 206.471.1344**  
5 **Mobile: 626.755.6442**  
6 **[fairchildadacrusader@gmail.com](mailto:fairchildadacrusader@gmail.com)**  
7 **OF HER OWN COUNSEL**  
8 **3-0 On Charged Felony Cases Maliciously Prosecuted**  
9 ***Spirit of Esquire***

10 **COUNTY OF LOS ANGELES**  
11 **BOARD OF SUPERVISORS PUBLIC BOARD MEETING**

13 **ALISON HELEN FAIRCHILD,**  
14 **Public Commenter,**

15 **v.**

16  
17 hilda solis,  
18 lindsey patrice horvath,  
19 holly j. mitchell,  
20 kathryn barger leibrich,  
21 janice hahn,

22 **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**

25 **JANUARY 6, 2025 PUBLIC COMMENT**

26 **ALISON HELEN FAIRCHILD**  
27 **1308 East Colorado Blvd. |Pasadena, CA. 91106**  
28 **Email: [fairchildadacrusader@gmail.com](mailto: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**

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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 Guitierrez 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,  
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24  
25

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13 Floor court entrance, which also impeded, blocked, and obstructed disabled Alison Helen  
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3 walkways. **THESE LOITERING, SOLICITING, & CONDUCTING BUSINESS ON  
4 COUNTY OF LOS ANGELES PUBLIC PROPERTY MUST BE REMOVED  
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24  
25  
26 **JANUARY 6, PUBLIC COMMENT**

**ALISON HELEN FAIRCHILD**  
1308 East Colorado Blvd. | Pasadena, CA. 91106  
Email: [fairchildadacrusader@gmail.com](mailto:fairchildadacrusader@gmail.com)  
Phone: 206.471.1344

1 **benefits and pay), Holly J. Mitchell ( paid \$ 372,850.00 by the County of Los Angeles**  
2 **in 2024 for her total benefits and pay), Hilda Solis (paid \$ 390,346 by the County of**  
3 **Los Angeles in 2024 for her total benefits and pay), Kathryn Barger-Leibrich (paid**  
4 **\$ 394,630 by the County of Los Angeles in 2024 for her total benefits and pay) and**  
5 **Janice Hahn ( paid \$ 371,719 by the County of Los Angeles in 2024 for her total**  
6 **benefits and pay) had better make sure that all pages and attachments of October**  
7 **14, 2025, October 21, and October 28, 2025 KING AROGANT and Alison Helen**  
8 **Fairchild County of Los Angeles Board of Supervisors' Public Board Comments**  
9 **become official records of County of Los Angeles and are also accessible to the**  
10 **public by way of County of Los Angeles's**

11  
12  
13 **Statement of Proceedings/Minutes in a timely and reasonable manner.**  
14

15 On the early morning of November 17, 2025, KING AROGANT was present at the handicap  
16 ramp complained upon to this ridiculous board of supervisors panel. KING AROGANT took  
17 photographs and video recordings that proved by clear and convincing evidence that County of Los  
18 Angeles continues to willfully, recklessly, wantonly, maliciously, deliberately, knowingly,  
19 carelessly, negligently, and callously allow individuals to loiter, solicit, obstruct, block, and solicit  
20 on the outside of the Stanley Superior Court's handicap ramp. See evidence below:  
21  
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26 **JANUARY 6, PUBLIC COMMENT**

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Email: [fairchildadacrusader@gmail.com](mailto:fairchildadacrusader@gmail.com)  
Phone: 206.471.1344



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

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**JANUARY 6, PUBLIC COMMENT**

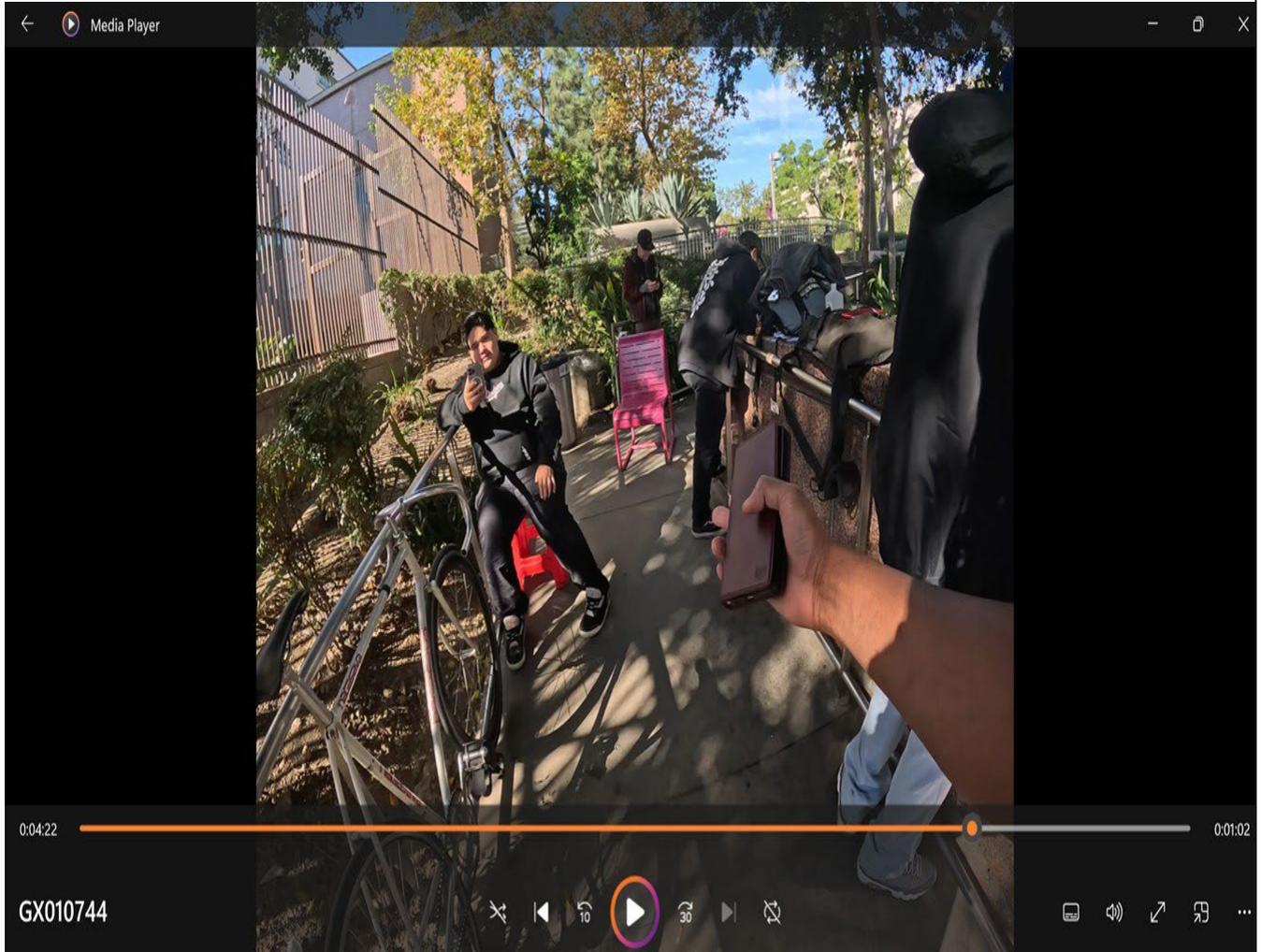
**ALISON HELEN FAIRCHILD**  
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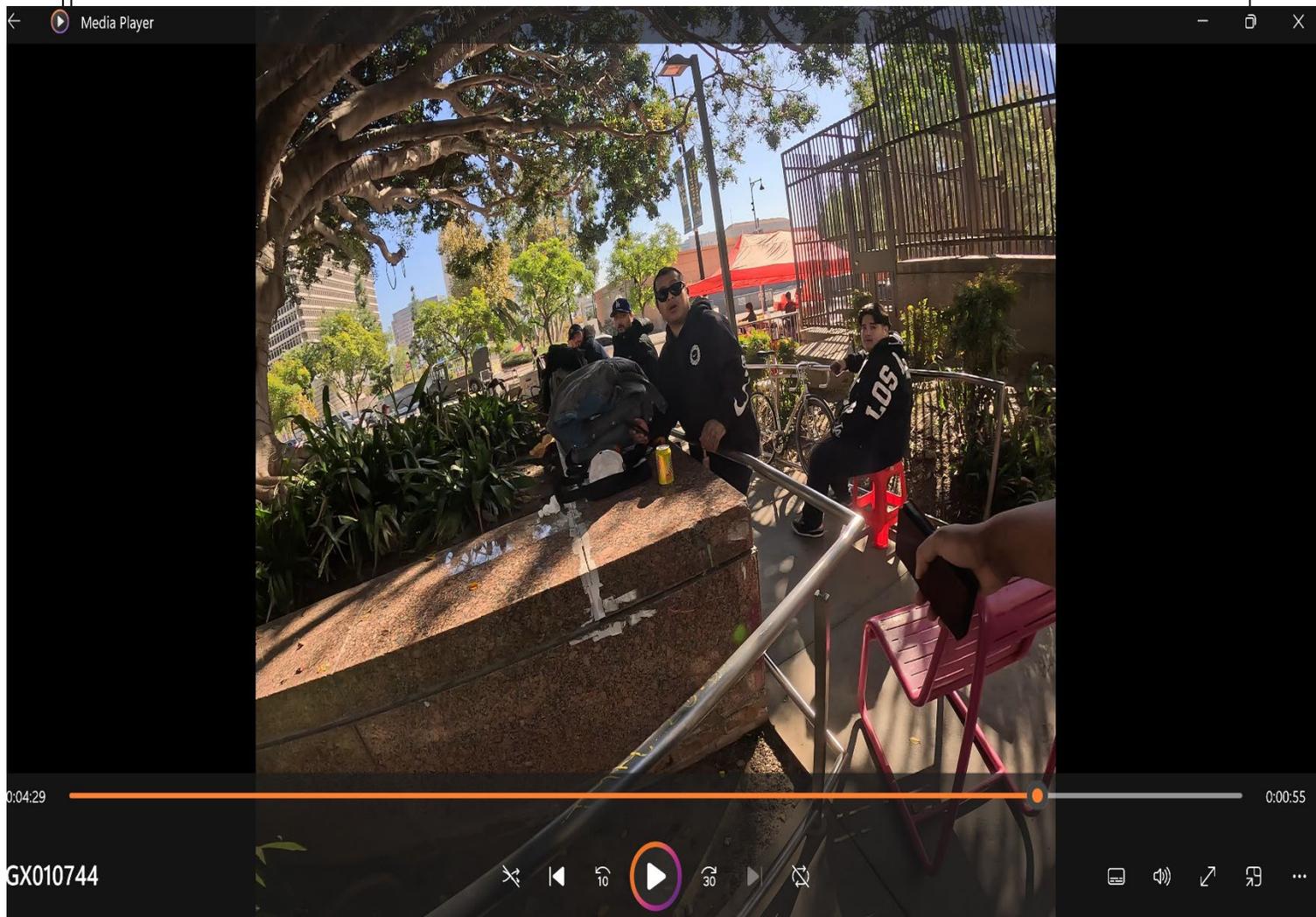


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1 CLEAR AND CONVINCING EVIDENCE OF COUNTY OF LOS ANGELES'S LIABILITY RECORDED ON  
2 DECEMBER 5, 2025

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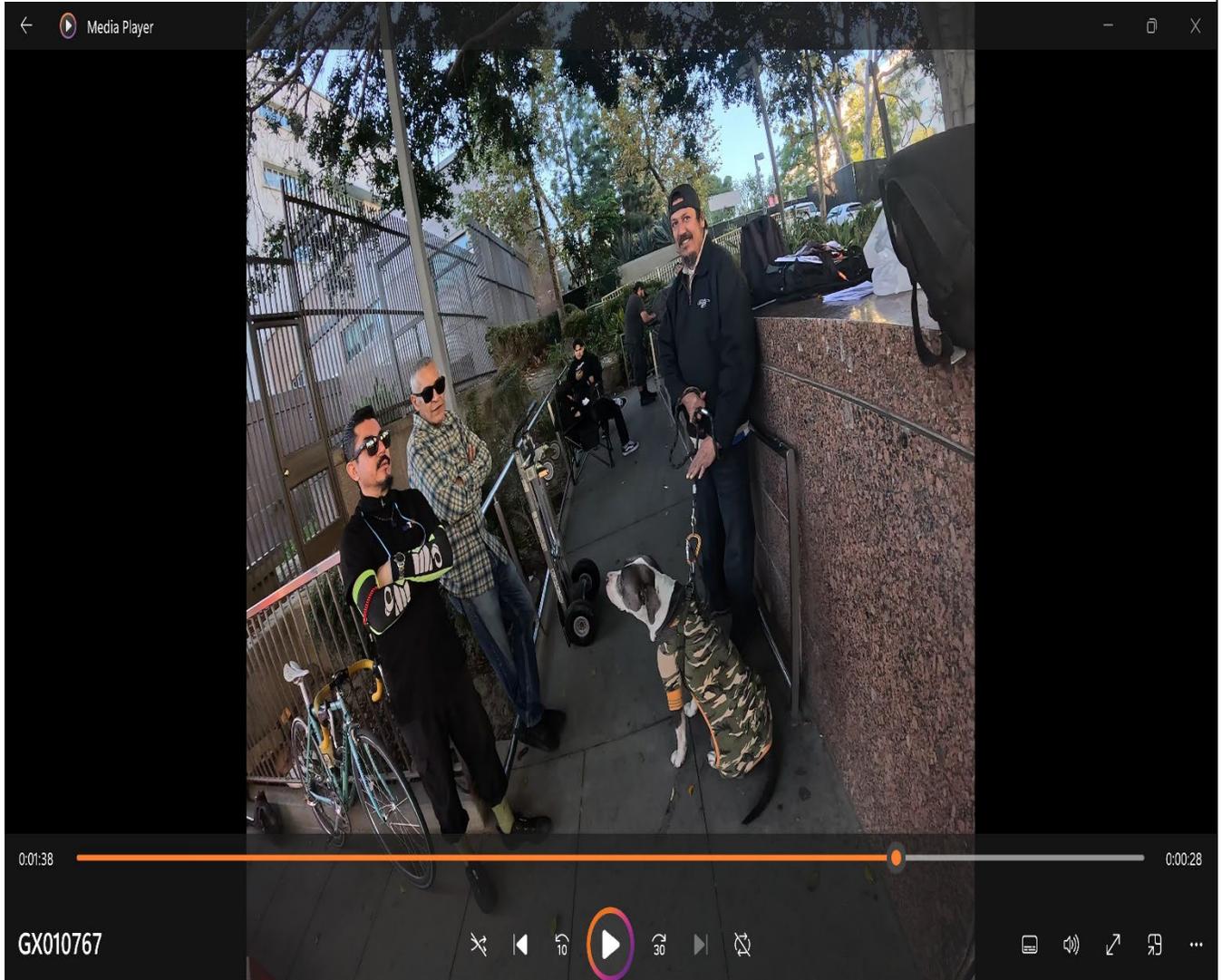


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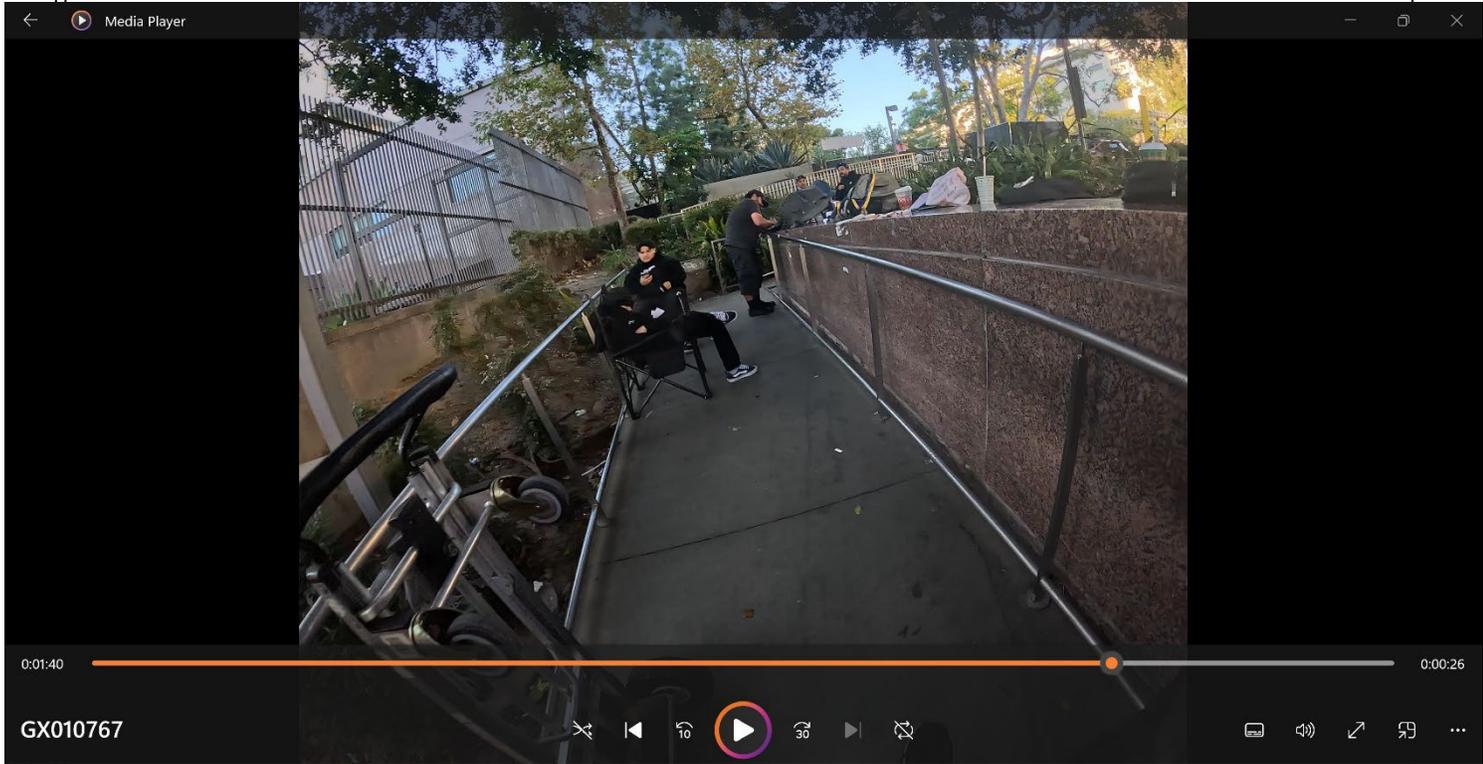
**JANUARY 6, PUBLIC COMMENT**

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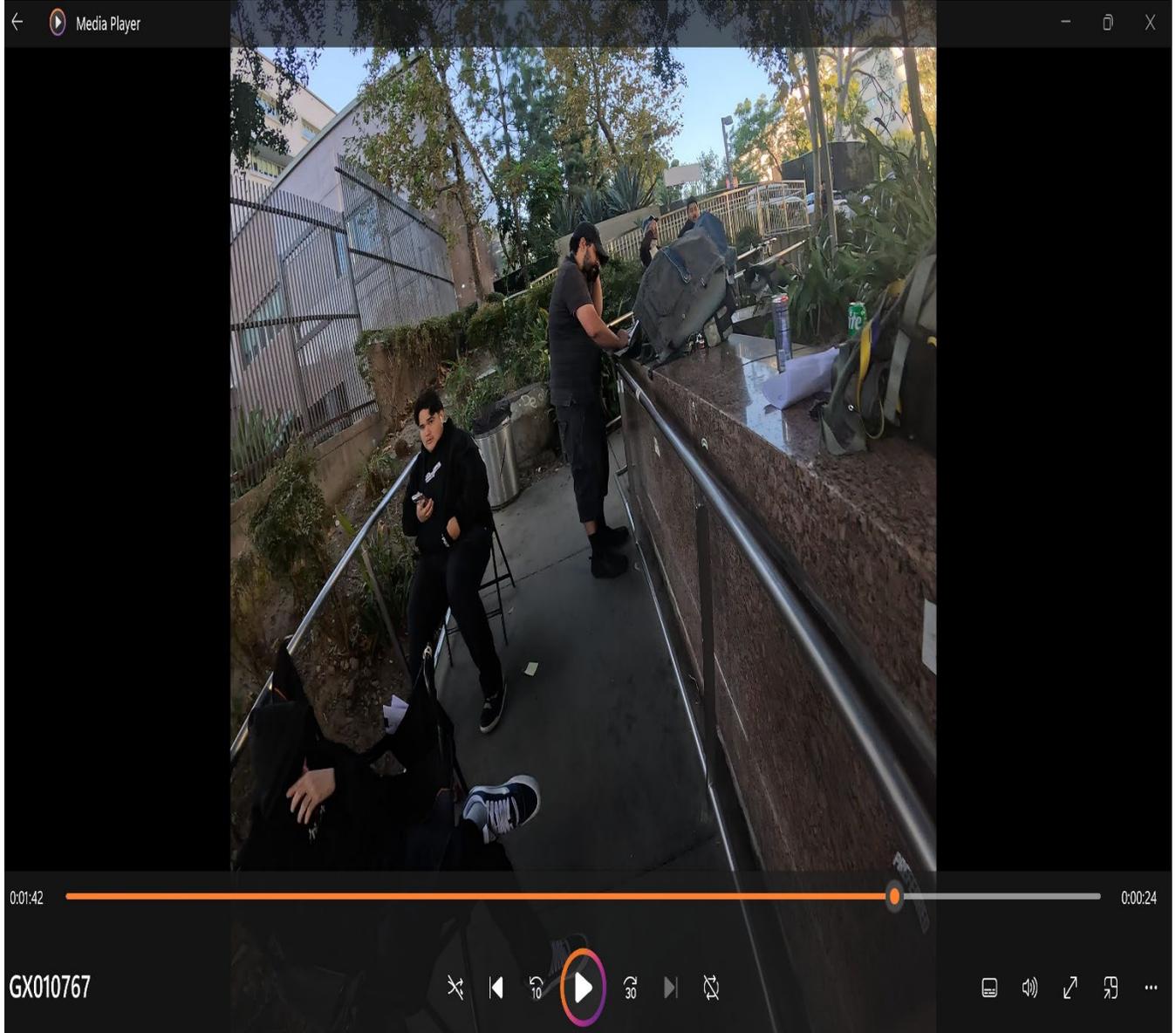
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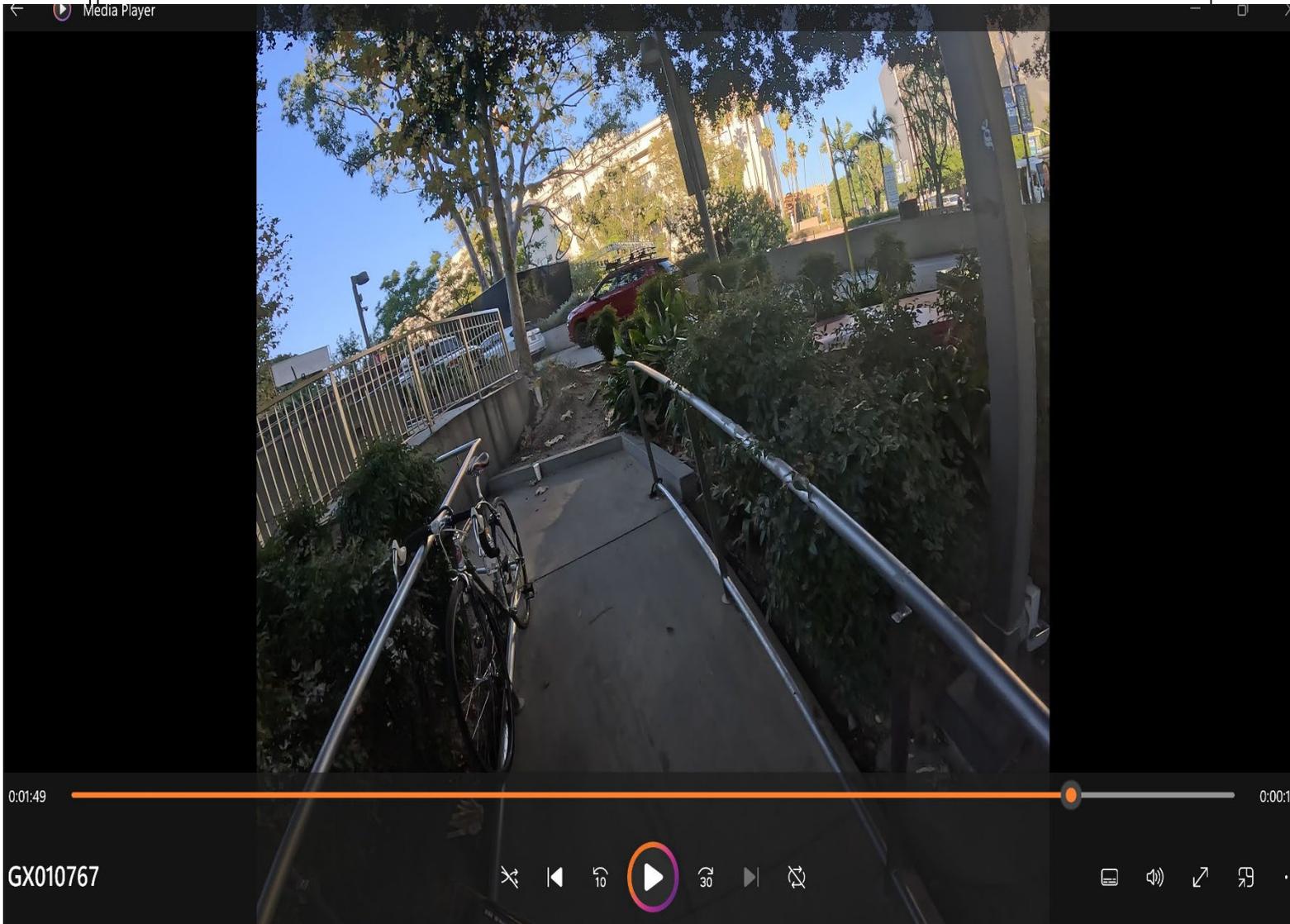
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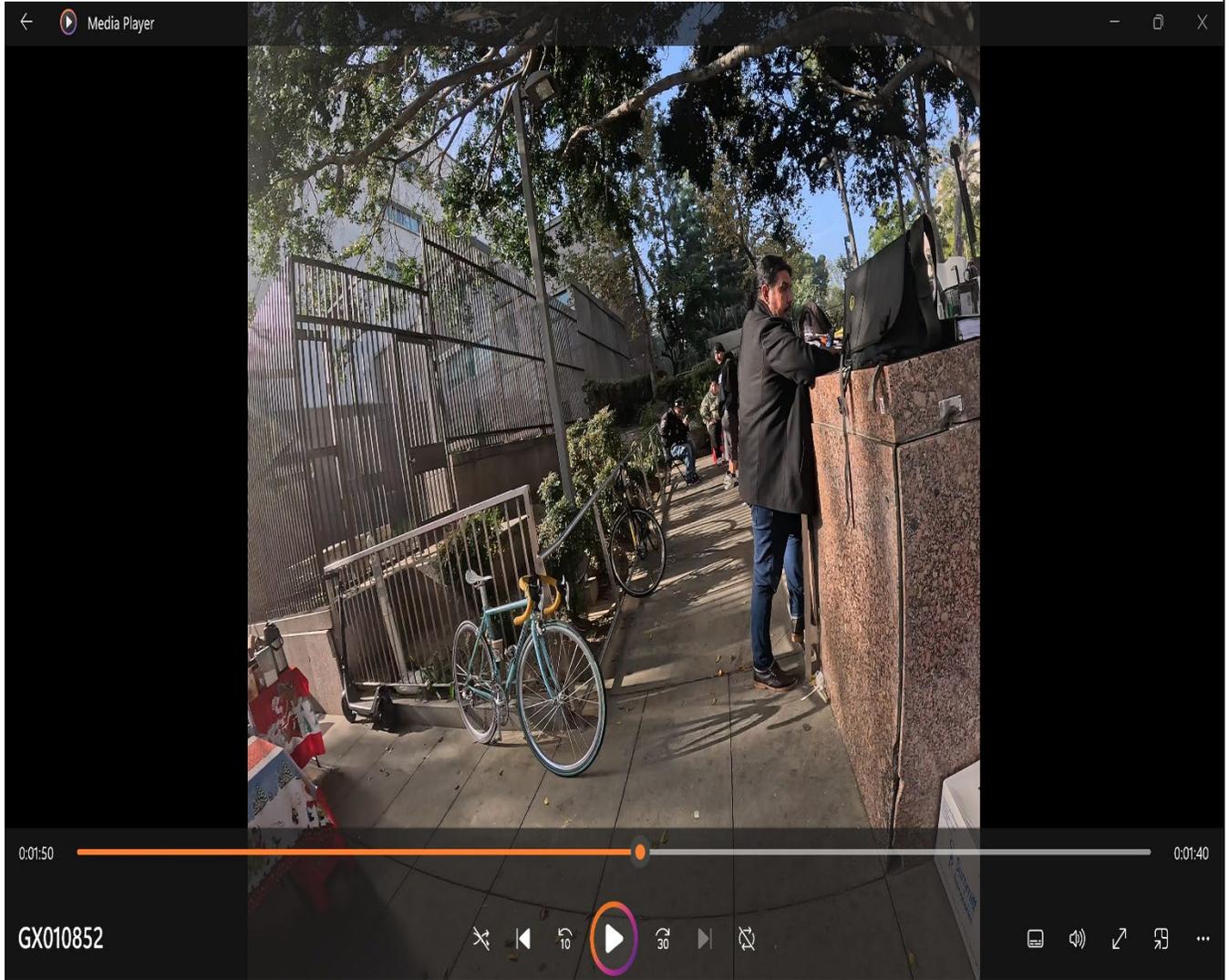


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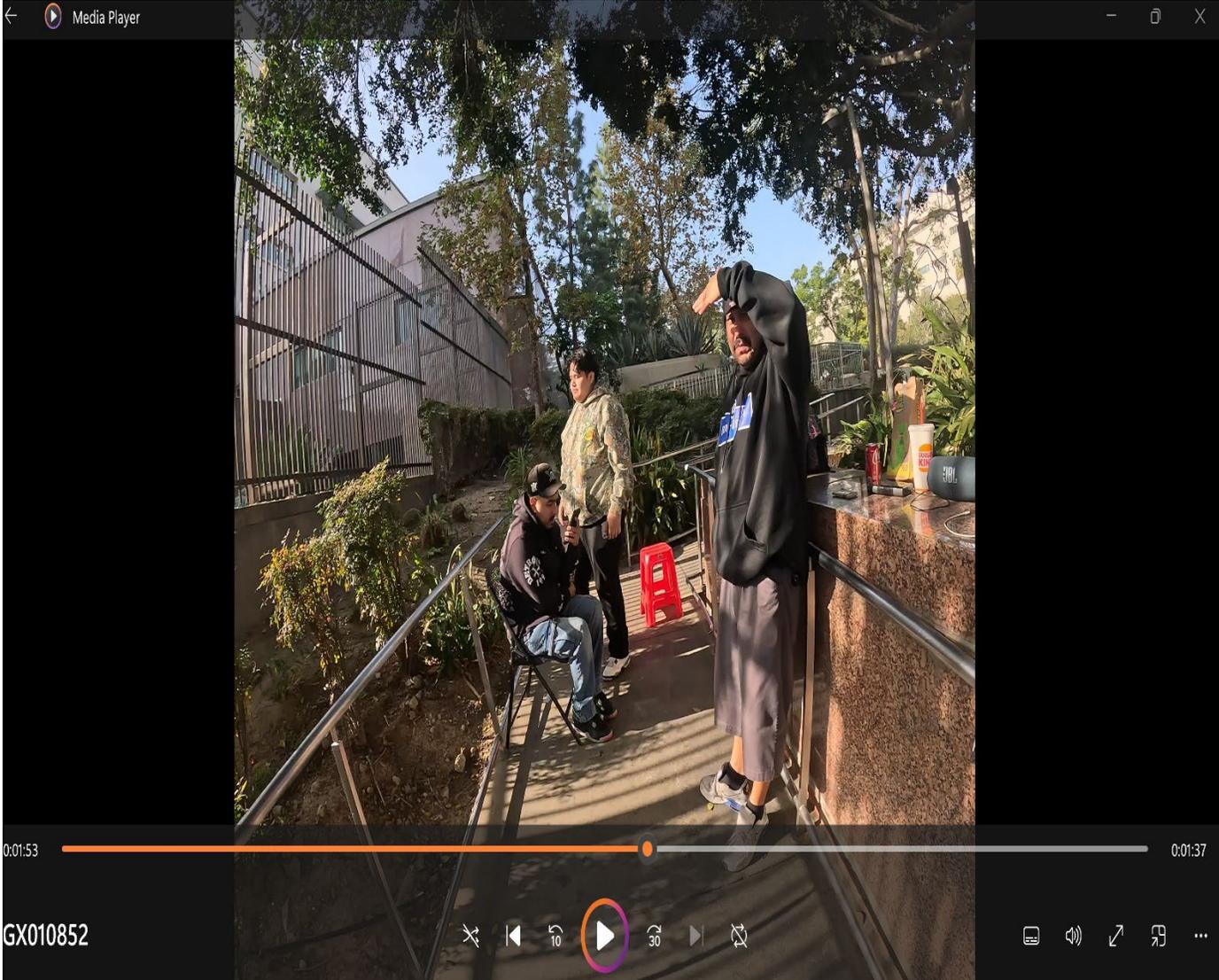
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1 CLEAR AND CONVINCING EVIDENCE OF COUNTY OF LOS  
2 ANGELES'S LIABILITY RECORDED ON DECEMBER 17, 2025  
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26 JANUARY 6, PUBLIC COMMENT

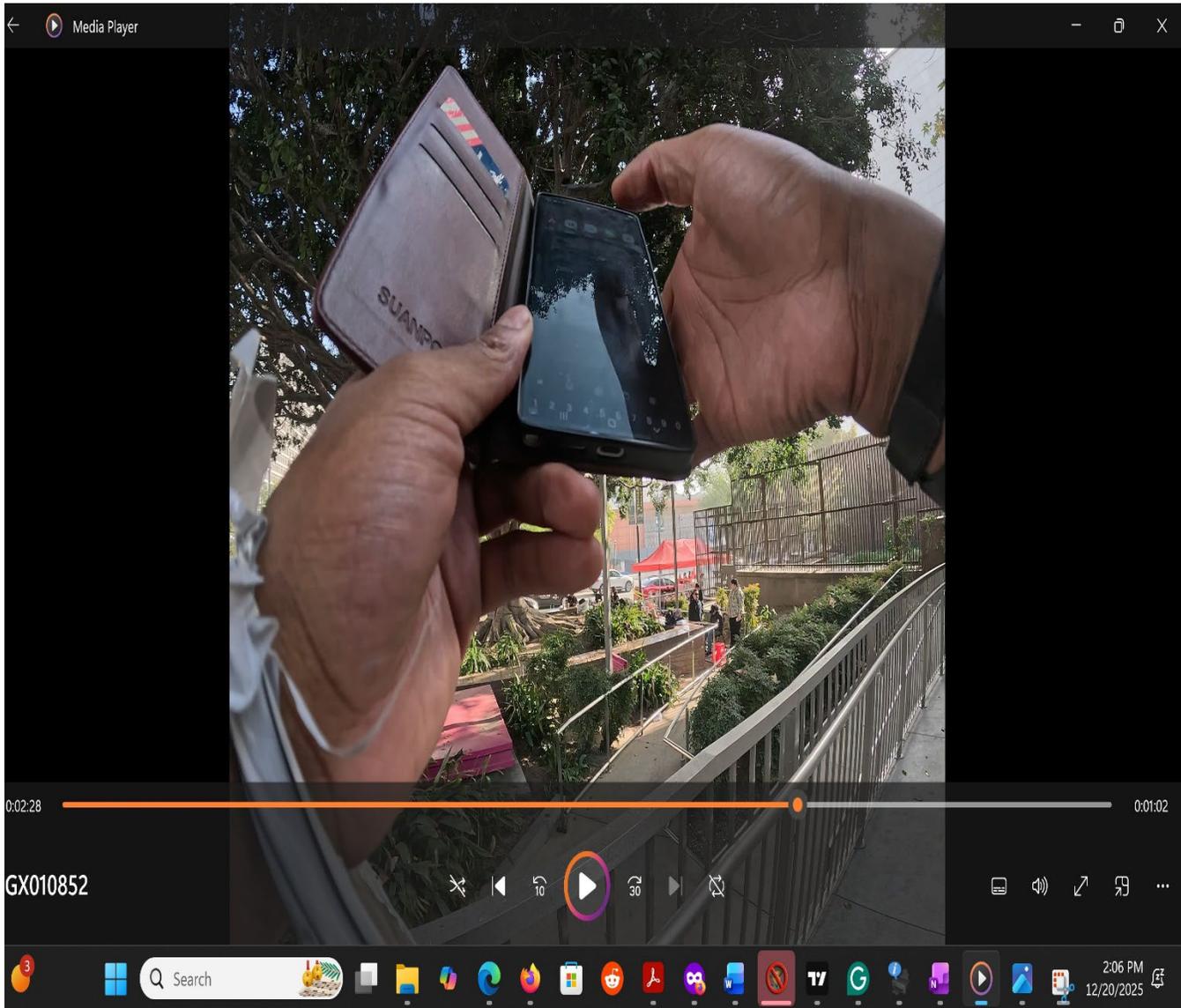
27 ALISON HELEN FAIRCHILD  
28 1308 East Colorado Blvd. | Pasadena, CA. 91106  
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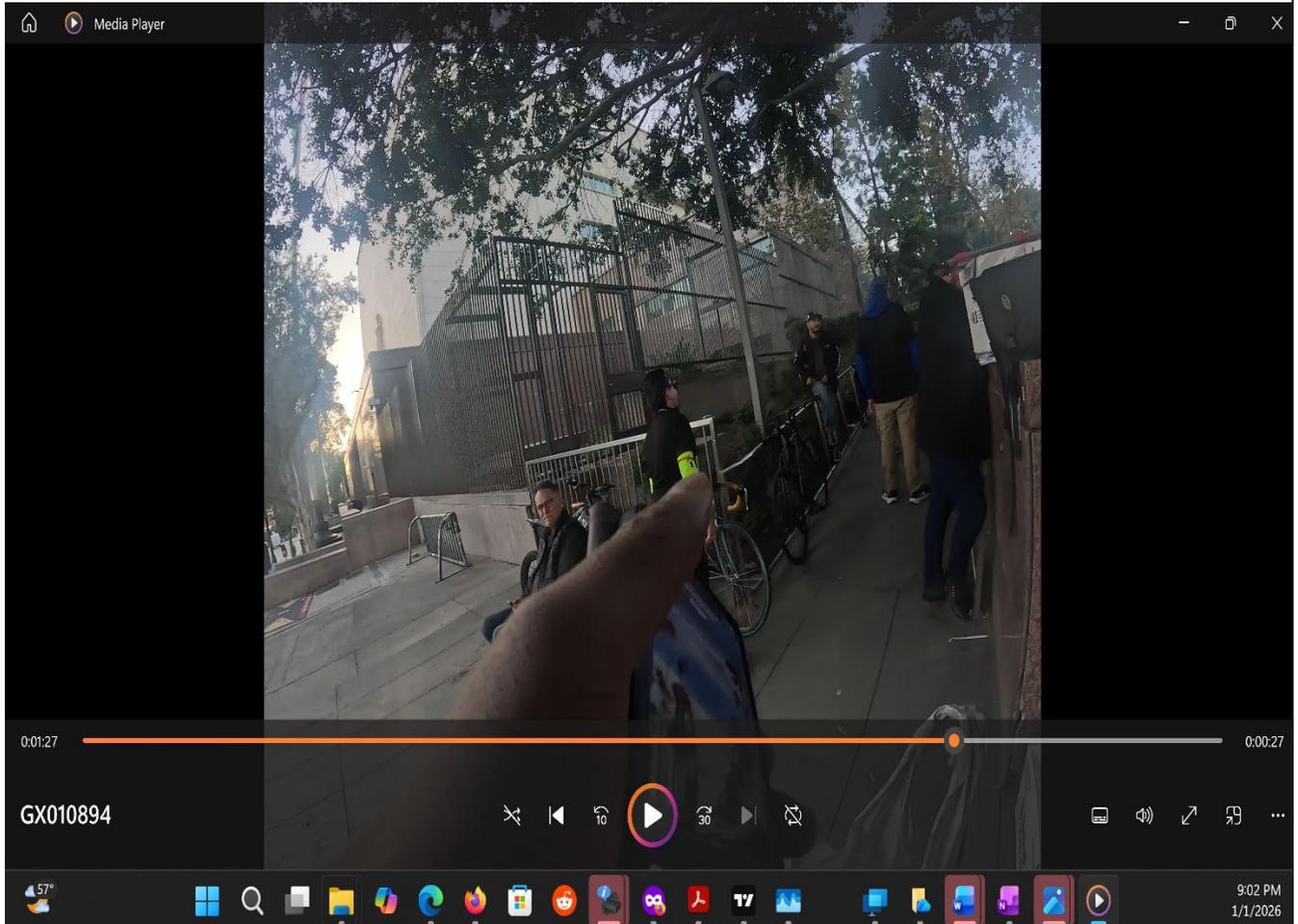


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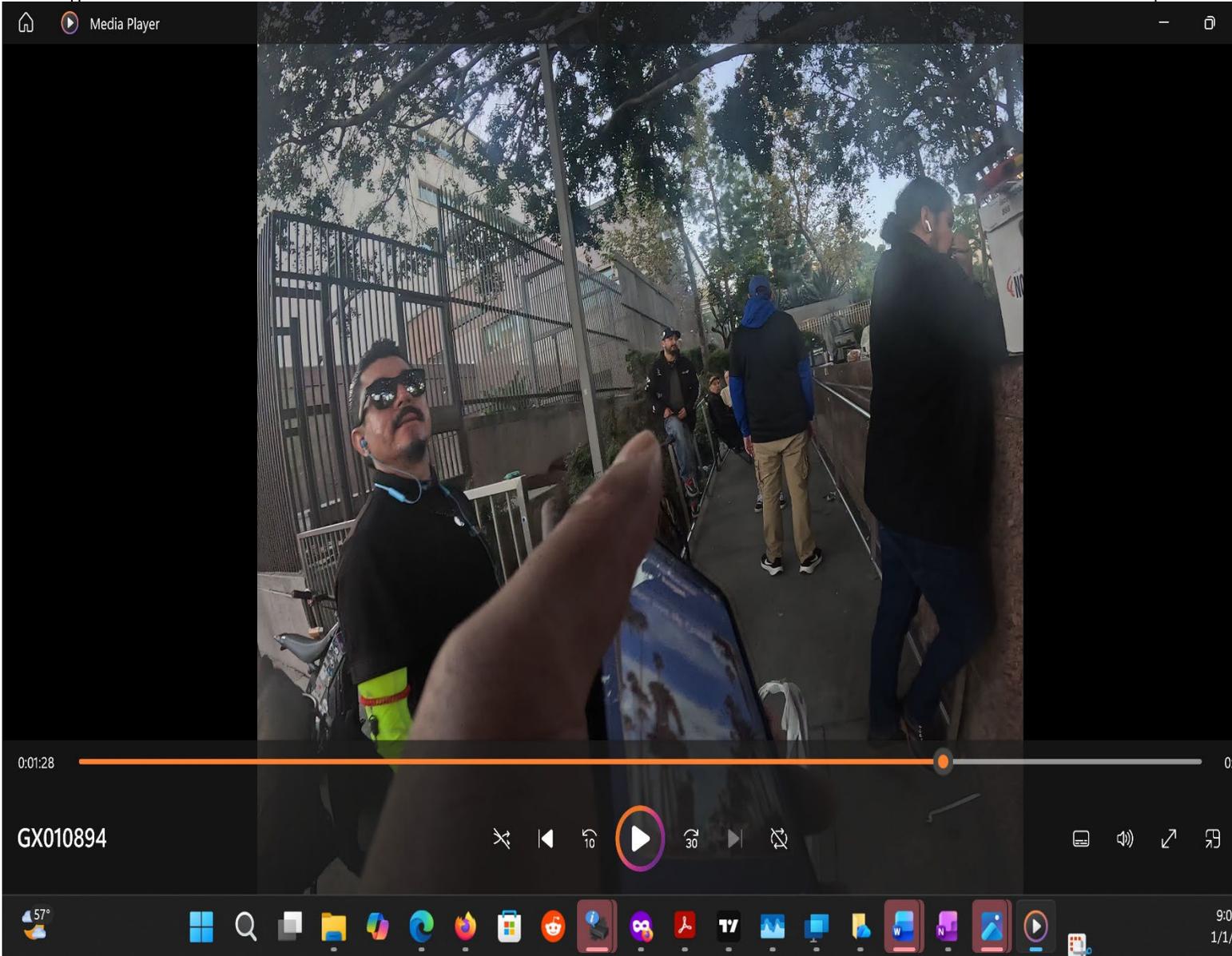
**CLEAR AND CONVINCING EVIDENCE OF COUNTY OF LOS ANGELES'S LIABILITY RECORDED ON DECEMBER 29, 2025**

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**JANUARY 6, PUBLIC COMMENT**

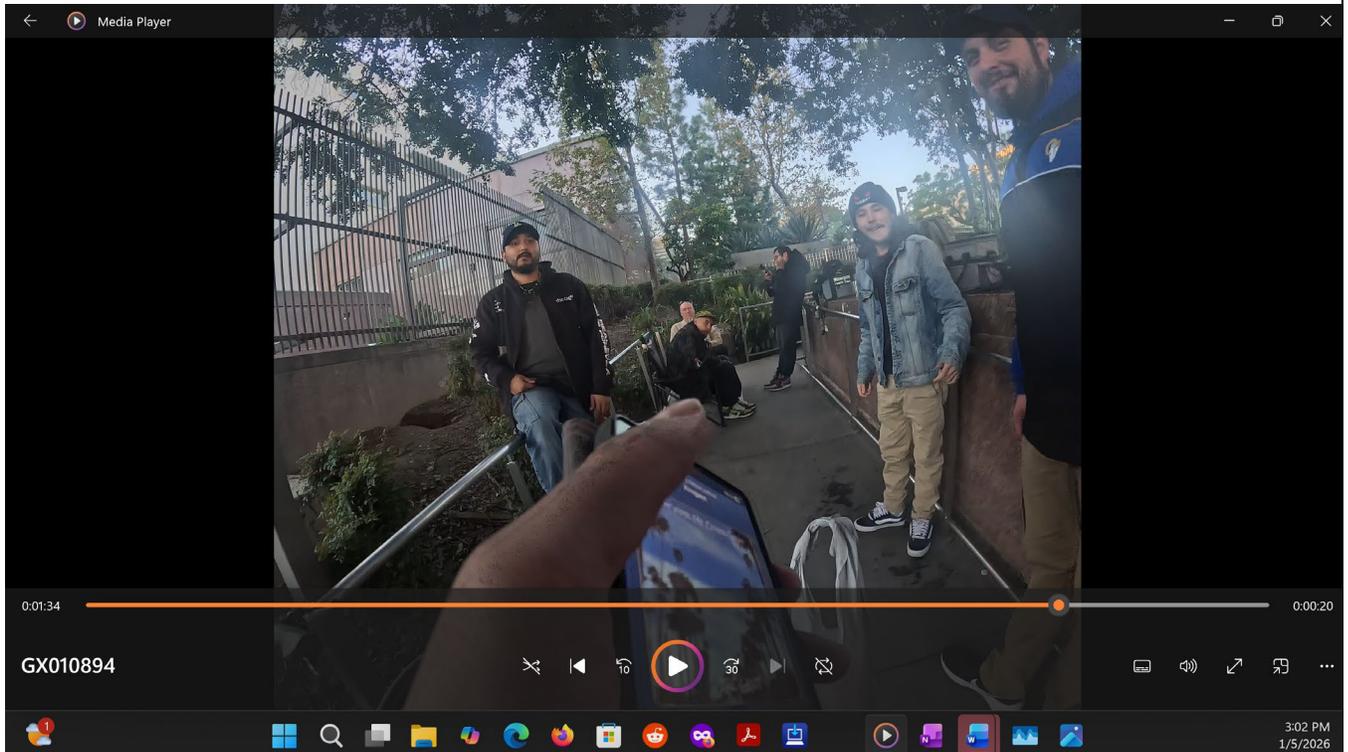
**ALISON HELEN FAIRCHILD**  
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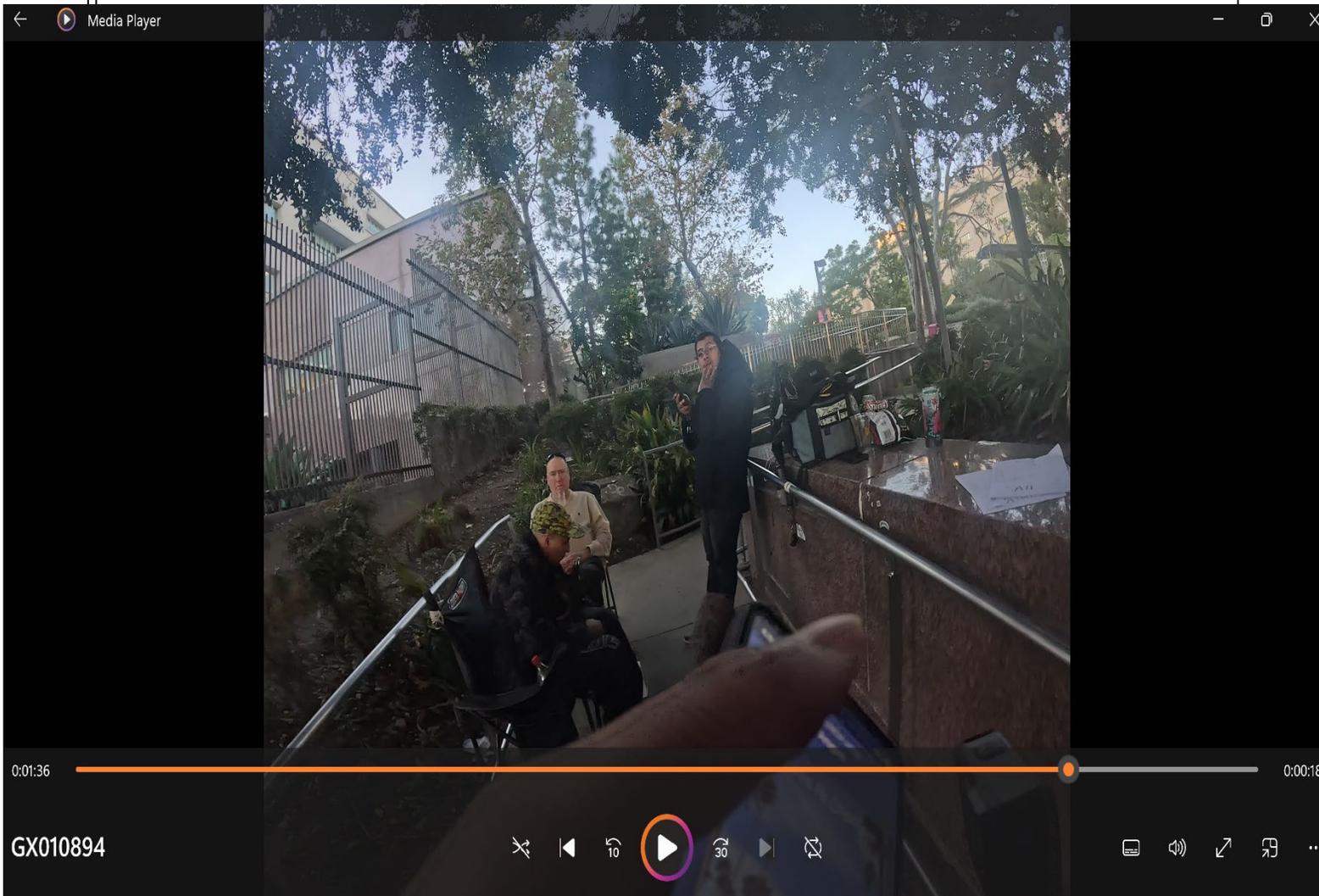
**ALISON HELEN FAIRCHILD**  
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THE INDIVIDUAL IN THE LIGHT BLUE JEAN COAT IS HOLDING DRUG PARAPHERNALIA IN HIS HANDS! INDIVIDUALS COUNTY OF LOS ANGELES ALLOWS TO BLOCK THE ADA STALEY MOSK HANDICAP RAMP WERE WITNESSED DOING CRYSTAL METHAMPHETAMINE AND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

JANUARY 6, PUBLIC COMMENT

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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=x88lO3C5algyknGR](https://youtu.be/TV_SVbeCGmQ?si=x88lO3C5algyknGR)  
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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](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=SARawqtDBRUCuE1V>  
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26 **JANUARY 6, PUBLIC COMMENT**

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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  
6 **GX010894 (12/29/2025, DEFENDANTS**  
7 **CREATED A NEW CIVIL RIGHTS**  
8 **COMPLAINT BY NOT REMOVING**  
9 **INDIVIDUALS)**  
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13 <https://youtu.be/YNtuUSqpwo4?si=XEncZ30d5P2bHYRO>  
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26 JANUARY 6, PUBLIC COMMENT

27 ALISON HELEN FAIRCHILD  
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28 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**  
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9 <https://youtu.be/hxMpo5qJmjY?si=JluH2u1fOqgOFK5T>  
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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.  
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26 JANUARY 6, PUBLIC COMMENT

27 **ALISON HELEN FAIRCHILD**  
28 **1308 East Colorado Blvd. |Pasadena, CA. 91106**  
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**Phone: 206.471.1344**

1 COUNTY OF LOS ANGELES DPSS EXECUTIVES

2 Tuesday, November 25, 2025  
3 1:12 AM

4 DIRECTOR OF DPSS & ALL ITS SERVICES AND DIVISIONS

5 DOCTOR JACQUELINE ("JACKIE") E. CONTRERAS

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

8 [jackiecontreras@dpss.lacounty.gov](mailto:jackiecontreras@dpss.lacounty.gov)

9 [Family\\_Social\\_Services@ceo.lacounty.gov](mailto:Family_Social_Services@ceo.lacounty.gov)

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17 MICHAEL J. SYLVESTER II, CHIEF DEPUTY AND CIO

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

20 [michaelsylvester@dpss.lacounty.gov](mailto:michaelsylvester@dpss.lacounty.gov)

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

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JANUARY 6, PUBLIC COMMENT

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28 Email: [fairchildadacrusader@gmail.com](mailto:fairchildadacrusader@gmail.com)  
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1 GABRIELA G. HERRERA, SPECIAL ASSISTANT/ BOARD LIAISON

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

4  
5 [GabrielaHerrera@dps.lacounty.gov](mailto:GabrielaHerrera@dps.lacounty.gov)

6  
7 SHERISE C. ENGLISH, ADMINISTRATIVE SERVICES DIVISION MANAGER

8 [sheriseenglish@dps.lacounty.gov](mailto:sheriseenglish@dps.lacounty.gov)

9  
10 CHANWANATHA SAMANTHA LIMON, ADMINISTRATIVE SERVICES DIVISION MANAGER

11 [chanwantha.limon@dps.lacounty.gov](mailto:chanwantha.limon@dps.lacounty.gov)

12  
13  
14  
15 CHERYL WARD, REGIONAL SERVICES ADMINISTRATOR, NORTH REGION 1

16 [cheryward@dps.lacounty.gov](mailto:cheryward@dps.lacounty.gov)

17  
18  
19 VICKI BARBER, REGIONAL SERVICES ADMINISTRATOR, EAST REGION II

20 [vickibarber@dps.lacounty.gov](mailto:vickibarber@dps.lacounty.gov)

21  
22 SONIA PEREZ, REGIONAL SERVICES ADMINISTRATOR, WEST METRO REGION III

23 [soniaperez@dps.lacounty.gov](mailto:soniaperez@dps.lacounty.gov)

24  
25 AIDA KARAPETYAN, REGIONAL SERVICES ADMINISTRATOR, SOUTH REGION IV

26 **JANUARY 6, PUBLIC COMMENT**  
[aidakarapetyan@dps.lacounty.gov](mailto:aidakarapetyan@dps.lacounty.gov)

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28 DIVISION ONE LEADERS (HEADQUARTERS GLENDALE)

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LILIA M . ERVITI, DIVISION 1 CHIEF

[liliaErviti@dpss.lacounty.gov](mailto:liliaErviti@dpss.lacounty.gov)

HAREGNESH ADAMU, HSA I

[HaregneshLemma@dpss.lacounty.gov](mailto:HaregneshLemma@dpss.lacounty.gov)

MARY ESTER GARCIA, HSA I

[MaryEstherGarcia@dpss.lacounty.gov](mailto:MaryEstherGarcia@dpss.lacounty.gov)

DARRYL BAKER, HSA 1

[DarrylBaker@dpss.lacounty.gov](mailto:DarrylBaker@dpss.lacounty.gov)

(PASADENA-HUB)

JUNIUS PERKINS, HSA 1

[JuniusPerkins@dpss.lacounty.gov](mailto:JuniusPerkins@dpss.lacounty.gov)

NASARIA MASON, HSA 1

[NasariaMason@dpss.lacounty.gov](mailto:NasariaMason@dpss.lacounty.gov)

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1 IRENE HUIZAR, DIVISION CHIEF

2 [IreneHuizar@dps.lacounty.gov](mailto:IreneHuizar@dps.lacounty.gov)

4 SAN FERNANDO HUB

6 ROCIO FRAGOSO, HSA 2

7 [RocioFragoso@dps.lacounty.gov](mailto:RocioFragoso@dps.lacounty.gov)

9 MICHELLE DEVIN, ELIGIBILITY SUPERVISOR

10 [michelleDevin@dps.lacounty.gov](mailto:michelleDevin@dps.lacounty.gov)

12 EAST VALLEY HUB (VAN NUYS)

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

15 [EduardTaranian@dps.lacounty.gov](mailto:EduardTaranian@dps.lacounty.gov)

17 PATRICIA ANDRADE, HSA 2

18 [PatriciaAndrade@dps.lacounty.gov](mailto:PatriciaAndrade@dps.lacounty.gov)

21 GISELDA A. LOZANO, ELIGIBILITY SUPERVISOR

22 [GriseldaLozano@dps.lacounty.gov](mailto:GriseldaLozano@dps.lacounty.gov)

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1 GERRY BONILLA, DIVISION CHIEF & PROGRAM COMPLIANCE

2 [GerryBonilla@dpss.lacounty.gov](mailto:GerryBonilla@dpss.lacounty.gov)

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

4  
5 SANTA CLARITA HUB

6 HILDA B. OCHOA, ELIGIBILITY SUPERVISOR

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

12 [AmyAlvarado@dpss.lacounty.gov](mailto:AmyAlvarado@dpss.lacounty.gov)

13  
14 ANDRANIK AGHASARYAN, HSA II

15 [AndranikAghasaryan@dpss.lacounty.gov](mailto: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](mailto:CarlosHi@dpss.lacounty.gov)

21 ESTELA MURGA, HSA II

22 [EstelaMurga@dpss.lacounty.gov](mailto:EstelaMurga@dpss.lacounty.gov)

23 ROSALVA SOLORIO, HSA III

24  
25 

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**JANUARY 6, PUBLIC COMMENT**

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

1 [RosalvaSolorio@dpss.lacounty.gov](mailto:RosalvaSolorio@dpss.lacounty.gov)  
GAIN REGION III, SUB-OFFICE POMONA

2  
3 VERONICA JULIANNA DE CICCO, HSA II

4 [VeronicaDeCicco@dpss.lacounty.gov](mailto:VeronicaDeCicco@dpss.lacounty.gov)

5  
6 **LANI F. ELJAIK, GAIN SERVICES SUPERVISOR**

7 [LaniEljaik@dpss.lacounty.gov](mailto:LaniEljaik@dpss.lacounty.gov)

8  
9 ROSALVA SOLORIO, HSA III (ALSO OVER SAN GABRIEL VALLEY HUB)

10 [RosalvaSolorio@dpss.lacounty.gov](mailto:RosalvaSolorio@dpss.lacounty.gov)

11  
12  
13 **GAIN REGION IV, CENTRAL COUNTY HUB (SOUTH CENTRAL LOS ANGELES)**

14  
15 TUONG VAN T. NGUYEN, DIVISION CHIEF

16 [Tuong-VanNguyen@dpss.lacounty.gov](mailto:Tuong-VanNguyen@dpss.lacounty.gov)

17  
18 MARIA MORUA, HSA I

19 [MariaMorua@dpss.lacounty.gov](mailto:MariaMorua@dpss.lacounty.gov)

20  
21 KEVIN NGUYEN, HSA 1

22 [KevinNguyen@dpss.lacounty.gov](mailto:KevinNguyen@dpss.lacounty.gov)

23  
24 **GAIN REGION V. SOUTH COUNTY-HUB (LOCATED NEAR CITY OF CARSON, CALIFORNIA)**

25  
26 **JANUARY 6, PUBLIC COMMENT**

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

1 MARSHA BRYANT-HURT, ASM III

2 [MarshaBryant-Hurt@dpss.lacounty.gov](mailto:MarshaBryant-Hurt@dpss.lacounty.gov)

3  
4 GERARDO MORA, HSA 1

5 [GerardoMora@dpss.lacounty.gov](mailto:GerardoMora@dpss.lacounty.gov)

6 JUANA MARQUEZ, HSA 1

7 [JuanaMarquez@dpss.lacounty.gov](mailto:JuanaMarquez@dpss.lacounty.gov)

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

9 CYNTHIA T. LOPEZ, ASM III

10 [CynthiaLopez@dpss.lacounty.gov](mailto:CynthiaLopez@dpss.lacounty.gov)

11 CARMEN SILVA ALVAREZ, HSA 1

12 [CarmenAlvarez@dpss.lacounty.gov](mailto:CarmenAlvarez@dpss.lacounty.gov)

13 RICHARD G. WHITE, HSA II

14 [RichardWhite@dpss.lacounty.gov](mailto:RichardWhite@dpss.lacounty.gov)

15 **APPEALS AND STATE HEARING DEPARTMENT**

16 BRIAN E. NOLINER, HSA III

17 [briannollner@dpss.lacounty.gov](mailto:briannollner@dpss.lacounty.gov)

18  
19 GERTRUDE JONES, SECRETARY IV

20 [getrudejones@dpss.lacounty.gov](mailto:getrudejones@dpss.lacounty.gov)

21  
22  
23  
24  
25 

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**JANUARY 6, PUBLIC COMMENT**

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

1 JESUS H. GUEVARA, HSA 1

2 [jesusguevara@dpss.lacounty.gov](mailto:jesusguevara@dpss.lacounty.gov)

3 SONYA MARTIN, HSA 1

4 [sonyamartin@dpss.lacounty.gov](mailto:sonyamartin@dpss.lacounty.gov)

5 **ROSHANN R. EDWARDS, SECRETARY IV**

6 [roshannedwards@dpss.lacounty.gov](mailto:roshannedwards@dpss.lacounty.gov)

7  
8  
9 **DPSS COMMISSION**

10 Wednesday, November 26, 2025  
11 2:10 AM

12 **DPSS COMMISSION MEMBERS**

13 1ST SUPERVISORIAL DISTRICT

14  
15 ADELE ANDRADE STADLER, CITY OF ALHAMBRA POLITICIAN

16 [astadler@cityofalhambra.org](mailto:astadler@cityofalhambra.org)

17  
18 ANDREW YAM (APPOINTED BY HILDA SOLIS)

19 [ayam@lacounty.gov](mailto:ayam@lacounty.gov)

20 [ayam@lacounty.gov](mailto:ayam@lacounty.gov)

21 [PSS\\_Commission@dpss.lacounty.gov](mailto:PSS_Commission@dpss.lacounty.gov)

22  
23  
24  
25 

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**JANUARY 6, PUBLIC COMMENT**

26 **ALISON HELEN FAIRCHILD**  
27 1308 East Colorado Blvd. |Pasadena, CA. 91106  
28 Email: [fairchildadacrusader@gmail.com](mailto: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](mailto:Summer.mcbride@gmail.com)

6 **BOOKER PEARSON, UNABLE TO LOCATE**

7  
8 **3RD SUPERVISORIAL DISTRICT**

9  
10  
11 **DOCTOR YVONNE CHAN,**

12 [yvonne@lacoedu](mailto:yvonne@lacoedu)

13 [ychan@myvaughncharter.com](mailto:ychan@myvaughncharter.com)

14 **CO-CONSPIRATOR**

15  
16 **FIDEL RAMIREZ, VAUGHN NEXT CENTURY LEARNING CENTER**

17 [framirez@myvaughncharter.com](mailto:framirez@myvaughncharter.com)

18 [latigentzz@aol.com](mailto:latigentzz@aol.com)

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

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

**ALISON HELEN FAIRCHILD**  
1308 East Colorado Blvd. |Pasadena, CA. 91106  
Email: [fairchildadacrusader@gmail.com](mailto:fairchildadacrusader@gmail.com)  
Phone: 206.471.1344

1 JONI BYUN, DIRECTOR OF KYCC

2 [jbyun@kyccla.org](mailto:jbyun@kyccla.org)

3  
4 **Byun**

5  
6 From <<https://www.linkedin.com/in/joni-byun-31318/>>

7  
8  
9 <https://www.linkedin.com/company/kyccla/>

10  
11  
12 **GENEVIEVE RIUTORT, PRESIDENT & CHIEF EXECUTIVE OFFICER OF THE  
WESTSIDE FOOD BANK (LOSER!) LMFAO**

13 [genevieve@wsfb.org](mailto:genevieve@wsfb.org)

14  
15 <https://www.linkedin.com/in/genevieveriutort/>

16  
17 GENEVIEVE CO-CONSPIRATOR

18  
19 YVONNE LEUNG, CHIEF OPERATING OFFICER

20 [yvonne@wsfb.org](mailto:yvonne@wsfb.org)

21  
22  
23  
24  
25

---

**JANUARY 6, PUBLIC COMMENT**

**ALISON HELEN FAIRCHILD**  
1308 East Colorado Blvd. |Pasadena, CA. 91106  
Email: [fairchildadacrusader@gmail.com](mailto:fairchildadacrusader@gmail.com)  
Phone: 206.471.1344

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

3 [sjoo@aadapinc.org](mailto:sjoo@aadapinc.org)

4 JOO CO-CONSPIRATOR

5  
6 LOUIS LEWIS, PROGRAM DIRECTOR

7 [llewis@aadapinc.org](mailto:llewis@aadapinc.org)

8  
9 <https://www.linkedin.com/in/sam-joo-32b6055/>

10  
11  
12 **DR. SUE EL HESSEN (VICE CHAIRPERSON)**

13 [selhessen@busd.k12.ca.us](mailto:selhessen@busd.k12.ca.us)

14 [yesim.yaramis@hcai.ca.gov](mailto:yesim.yaramis@hcai.ca.gov)

15 [Sue.elhessen@hcai.ca.gov](mailto:Sue.elhessen@hcai.ca.gov)

16 [Sue.elhessen@state.ca.gov](mailto:Sue.elhessen@state.ca.gov)

17  
18  
19 <https://www.linkedin.com/in/dr-sue-elhessen-11aa564/>

20  
21  
22  
23  
24  
25  
26 **JANUARY 6, PUBLIC COMMENT**

**ALISON HELEN FAIRCHILD**  
1308 East Colorado Blvd. | Pasadena, CA. 91106  
Email: [fairchildadacrusader@gmail.com](mailto:fairchildadacrusader@gmail.com)  
Phone: 206.471.1344

1 **5TH SUPERVISORIAL DISTRICT**

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

4  
5 [mihrankalaydjian@gmail.com](mailto:mihrankalaydjian@gmail.com)  
6 [mihrankalaydjian@hotmail.com](mailto:mihrankalaydjian@hotmail.com)  
7 [kmihran@hotmail.com](mailto:kmihran@hotmail.com)  
8 [mkalaydjian@winnetkanc.com](mailto:mkalaydjian@winnetkanc.com)

9 JUAN LEANOS (UNABLE TO LOCATE)

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

12  
13 **COUNTY OF LOS ANGELES DPSS EXECUTIVES**

14 Tuesday, November 25, 2025  
15 1:12 AM

16  
17 **ALSO COUNTY OF LOS ANGELES BOARD OF SUPERVISORS FOR DISTRICTS 1-5**

18  
19 **YOU ALL HAVE 72 HOURS EXCLUDING WEEKENDS AND HOLIDAYS, BUT IN NO EVENT LATER THAN**  
20 **DECEMBER 4, 2025, AT 5 PM PACIFIC STANDARD TIME. TO MAKE SURE FAIRCHILD'S EBT CARD GETS**  
21 **REFUNDED FOR ALL THE ALBERTSONS COMPANIES VONS GROCERY DELIVERY ORDERS ALLEGED**  
22 **AND STATED IN THE ELECTRONIC MAIL MESSAGE YOU WERE ALL ELECTRONICALLY SERVED ON**  
23 **NOVEMBER 29, 2025, AT 1:59 PM.**

24  
25  
26 **JANUARY 6, PUBLIC COMMENT**

27 **ALISON HELEN FAIRCHILD**  
28 **1308 East Colorado Blvd. |Pasadena, CA. 91106**  
**Email: [fairchildadacrusader@gmail.com](mailto: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](mailto:fairchildadacrusader@gmail.com)**

16 *Spirit of Esquire*

17  
18  
19  
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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](mailto: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 I, **ALISON HELEN FAIRCHILD**, being duly sworn, say:

10  
11 I, ALISON HELEN FAIRCHILD, am a Public Commenter and Future Plaintiff in the  
12 meritorious pending action against the County of Los Angeles, its co-conspirators, and its  
13 employees.

14  
15 I have carefully and thoroughly read and examined the following:

- 16  
17 1. **ALISON HELEN FAIRCHILD'S PUBLIC COMMENT FOR JANUARY 6,**  
18 **2026**

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

22  
23  
24  
25  
26 **VERIFICATION OF ALISON HELEN FAIRCHILD**

**ALISON HELEN FAIRCHILD**  
1308 East Colorado Blvd. | Pasadena, CA. 91106  
Email: [fairchildadacrusader@gmail.com](mailto: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 **DATE: January 6, 2026**

12  
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](mailto: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](mailto:fairchildadacrusader@gmail.com)**  
**Phone: 206.471.1344**

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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](mailto:attorney@neilopdahl.com)

8 **Attorney for Plaintiff**

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

13 ***ALISON HELEN FAIRCHILD,***

14  
15 Plaintiff,

16  
17 v.

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

25 Defendant(s),

26 **Case No.:**

27 **VERIFIED ORIGINAL CIVIL RIGHTS**  
28 **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 IIED & 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 IIED**  
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.

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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 2. Defendants violated state and federal laws by committing **reckless under color of law**  
2 **negligence, reckless under color of law negligence per se, reckless under color of law gross**  
3 **negligence and reckless under color of law neglect to their duty to assist and investigate** even  
4 after they were all timely and previously served a cease-and-desist letter on numerous occasions,  
5 sent numerous emails, facsimiles, received personal service at 500 West Temple Street, Room  
6 383, Los Angeles, CA 90012 by nonparty Arogant Hollywood, received notification and, and  
7 were all given **FAIR NOTICE** through Plaintiff Alison Helen Fairchild’s numerous electronic  
8 mail messages and appearances at County of Los Angeles Board of Supervisors public meetings  
9 in November 2025 and December 2025. All Defendants sued herein were either served a copy of  
10 Plaintiff’s numerous cease-and-desist letters or had constructive knowledge of her cease-and-  
11 desist letters. Defendants Jose Flores, Tatianna Simoes-Silva, Nationwide Legal, Rapid Legal,  
12 and InfoTrack US, Inc.’s One Legal were all given cease-and-desist notice by telephone  
13 communication only. All private party Defendants sued herein acted under color of law through  
14 their very close nexus relationship with the County of Los Angeles Superior Court and its  
15 County of Los Angeles peace officers. Additionally, all private-party Defendants violated  
16 numerous statutes under Title III of the Americans with Disabilities Act of 1990.  
17

18 3. This is an original 42 U.S.C. § 1983 constitutional civil rights complaint that seeks to  
19 establish the reckless, wanton, willful, cruel, unconstitutional, malicious, careless, fraudulent,  
20 deliberate, and callous actions of 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 of recklessly violating Plaintiff Alison  
24 Helen Fairchild’s United States constitutional civil rights. Plaintiff Alison Helen Fairchild’s  
25 original civil rights complaint seeks to effectuate change through punitive damages by punishing  
26 Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell,  
27  
28

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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  
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  
28

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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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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 Courthouse, but on an hourly basis, while lazy and incompetent County of Los Angeles and City  
2 of Los Angeles peace officers watch these criminals and low-life individuals use drugs and drink  
3 alcohol at the exact same time, and while they patrol and park nearby in the comfort of their  
4 agency/department-issued marked peace officer vehicle. The reckless under color of law  
5 negligence, reckless under color of law negligence per se, reckless under color of law gross  
6 negligence, general negligence, negligence per se, and gross negligence and all other illegal acts  
7 done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J.  
8 Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US,  
9 Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of  
10 Los Angeles & DOES 1-10 resulted in Plaintiff Alison Helen Fairchild being deprived of her  
11 Due Process Clause constitutional rights in direct violation of the Fourteenth Amendment of the  
12 United States Constitution. The reckless under color of law negligence, reckless under color of  
13 law negligence per se, reckless under color of law gross negligence, general negligence,  
14 negligence per se, and gross negligence and all other illegal acts done by Defendants Hilda  
15 Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber  
16 Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal  
17 LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-  
18 10 resulted in Plaintiff Alison Helen Fairchild being deprived of her constitutional civil rights  
19 protected under Title II and Title III of Americans with Disabilities Act of 1990.

20  
21 4. All other named and unnamed Defendants acted under the color of law by working very  
22 closely with the County of Los Angeles local government, County of Los Angeles Board of  
23 Supervisors, County of Los Angeles peace officers, County of Los Angeles Superior Court  
24 employees, and DOES 1-10 to recklessly violate the United States constitutional civil rights of  
25 Plaintiff Alison Helen Fairchild.

1 5. This action arises from a violation, inter alia, of Title II of the Americans with  
2 Disabilities Act of 1990 codified at 42 U.S.C. § 12132, *et seq.*, Title III of the Americans with  
3 Disabilities Act of 1990 codified at 42 U.S.C. 12101 *et seq.*, 42 U.S.C. § 1983, 42 U.S.C. §  
4 1985, 42 U.S.C. § 1986, and 42 U.S.C. § 12203. Plaintiff Alison Helen Fairchild seeks to  
5 redress violations of her California state civil rights and her federal civil rights via the  
6 supplemental jurisdiction of this United States District Court.

7  
8  
9 **II. STATUTE OF LIMITATIONS**

10  
11 6. Plaintiff Alison Helen Fairchild brought this original civil rights complaint before this  
12 United States Court for the Central District of California before the expiration of Alison Helen  
13 Fairchild’s statute of limitations, which will expire on or about August 21, 2027. Plaintiff Alison  
14 Helen Fairchild will allege throughout this original civil rights complaint numerous factual  
15 allegations that occurred between 2015 and 2025.

16  
17  
18 **III. PRELIMINARY STATEMENT**

19  
20 7. This is an original constitutional civil rights action in which Plaintiff **ALISON HELEN**  
21 **FAIRCHILD [hereinafter “Fairchild” or Plaintiff]** seeks damages to redress the under color  
22 of law deprivation of constitutional civil rights secured to Plaintiff under the Fourteenth  
23 Amendment of the United States Constitution, under 42 U.S.C. § 1983, under 42 U.S.C. § 1985,  
24 under 42 U.S.C. § 1986, under Title II of the Americans with Disabilities Act of 1990, under 42  
25 U.S.C. § 12132, *et seq.*, Title III of the Americans with Disabilities Act of 1990, under 42  
26 U.S.C. 12101 *et seq.*, and under 42 U.S.C. § 12203.

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  
27  
28

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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 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.

18  
19  
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.

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28  

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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 **VI. JURISDICTION & VENUE**

2  
3 10. This original civil rights action is brought pursuant to 42 U.S.C. §§ 1983, 1985, 1986,  
4 12101, 12132, & 12203 to redress the under color of law deprivation of Plaintiff Alison Helen  
5 Fairchild’s constitutional civil rights as secured by the United States Constitution, Title II of the  
6 Americans with Disabilities Act of 1990, & Title III of the Americans with Disabilities Act of  
7 1990. This United States District Court for the Central District of California has intradistrict  
8 assignment privileges over all Defendants. Plaintiff Alison Helen Fairchild’s federal claims and  
9 allegations are based on violations committed by Defendants who reside and are gainfully  
10 employed in the County of Los Angeles and separately County of San Bernardino (Defendants  
11 Rapid Legal Inc. and Tatianna Simoes-Silva reside and work in the County of San Bernardino).  
12 Nearly all of those Defendants transacted business with the County of Los Angeles and were  
13 paid handsomely by the County of Los Angeles regarding and relating to these claims and  
14 allegations made against all Defendants. All Defendants were employed by the County of Los  
15 Angeles or by California corporations, including Nationwide Legal LLC, Rapid Legal Inc., and  
16 InfoTrack US. Inc.’s California-based One Legal, while they were transacting business and  
17 gainfully employed from and in the County of Los Angeles and the County of San Bernardino.  
18 All herein named private citizen and private corporation Defendants conspired with County of  
19 Los Angeles employed Defendants residing and working in County of Los Angeles to willfully,  
20 knowingly, recklessly, maliciously, wantonly, deliberately, cruelly, fraudulently, carelessly, and  
21 callously deprive Plaintiff Alison Helen Fairchild of her United States Fourteenth Amendment  
22 Due Process Clause constitutional and her constitutional civil rights protected under Titles II &  
23 III of the Americans with Disabilities Act of 1990 while they were all recklessly bathed, clothed,  
24 draped, and covered in, of and under the color of law.

25  
26 11. This United States District Court has original jurisdiction pursuant to 28 U.S.C. §§ 1331  
27 and 1343.

28  

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1 12. This United States District Court has supplemental jurisdiction under 28 U.S.C. §  
2 1367(a).

3  
4 13. Declaratory and injunctive relief are authorized by 28 U.S.C. §§ 2201, 2202, and 1343.

5  
6 14. Venue is proper under 28 U.S.C. § 1391(b)(1) because Defendants Hilda Lucia Solis,  
7 Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-  
8 Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.'s One Legal, Nationwide  
9 Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles &  
10 DOES 1-10 all reside in this United States Central District of California judicial district.

11  
12 15. Personal jurisdiction is proper against Defendants Hilda Lucia Solis, Deni K. Butler,  
13 Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco  
14 Garibay, Gerardo Valdivia, InfoTrack US, Inc.'s One Legal, Nationwide Legal LLC, Rapid  
15 Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 because  
16 they are either domiciled in California, or have regularly transacted business in the state of  
17 California, or are gainfully employed in the state of California.

18  
19 16. This United States District Court has original jurisdiction pursuant to 28 U.S.C. §  
20 1332(a)(1) because Plaintiff Alison Helen Fairchild is a citizen of the state of California and  
21 Delaware incorporated InfoTrack US, Inc. is a citizen of the state of New York, and the  
22 damages demanded against Defendant InfoTrack US, Inc. exceeds the monetary amount of \$  
23 75,000.

24  
25 17. This is an original constitutional civil rights action for general damages, compensatory  
26 damages, punitive damages, special damages, injunctive relief, and declaratory relief under 42  
27

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

9  
10 18. This is an original constitutional civil rights action for general damages, compensatory  
11 damages, punitive damages, special damages, injunctive relief, and declaratory relief under 42  
12 U.S.C. §§ 1983, 1985, 1986, 12101, 12132 & 12203 based upon Defendants Hilda Lucia Solis,  
13 Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-  
14 Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.’s One Legal, Nationwide  
15 Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles &  
16 DOES 1-10’s under color of law willful, knowing, reckless, wanton, malicious, careless,  
17 deliberate, cruel, fraudulent, and callous violations of the Due Process Clause of the Fourteenth  
18 Amendment of the United States Constitution, Title II of the Americans Disabilities Act of 1990  
19 and Title III of the Americans with Disabilities Act of 1990.

20  
21  
22 **VII. JURY TRIAL DEMAND AND CIVIL RIGHTS COMPLAINT OF ALISON  
HELEN FAIRCHILD**

23  
24 19. **PLAINTIFF ALISON HELEN FAIRCHILD**, individually, brings this original  
25 constitutional civil rights action against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G.  
26 Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay,  
27 Gerardo Valdivia, InfoTrack US, Inc.’s One Legal, Nationwide Legal LLC, Rapid Legal Inc.,  
28

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

2  
3  
4 **VIII. PLAINTIFF ALISON HELEN FAIRCHILD HEREBY ALLEGES AS SET**  
5 **FORTH**

6  
7  
8 **IX. SUBJECT MATTER JURISDICTION & ARTICLE III STANDING TO BRING**  
9 **FORTH THIS LAWSUIT**

10  
11 20. To establish standings to maintain an action in federal district court, a plaintiff must  
12 allege: (1) injury in fact, (2) causation----“a fairly traceable connection between the plaintiff’s  
13 harm and the complained of conduct of the defendant”, and------(3) redressability -----  
14 “a likelihood that the requested relief will redress the alleged injury.” See *Steel Co. v. Citizens*  
15 *for a Better Environment*, 523 U.S. 83, 118 S.Ct. 1003, 140 L.Ed.2d 210 (1998); *Lujan v.*  
16 *Defenders of Wildlife*, 504 U.S. 555, 112 S.Ct. 2130, 119 L.Ed.2d 351 (1992)

17  
18 21. The Supreme Court has explained that “the irreducible constitutional minimum’ of  
19 standing consists of three elements.” See *Spokeo Inc. v. Robins*, 578 U.S. 330, 136 S.Ct. 1540,  
20 194 L.Ed.2d 635 (2016) (*quoting Lujan*, 504 U.S. at 560). A plaintiff “must have (1) suffered an  
21 injury in fact, (2) that is fairly traceable to the challenged conduct of a defendant, and (3) that is  
22 likely to be redressed by a favorable judicial decision.

23  
24 22. Plaintiff Alison Helen Fairchild has alleged that Defendants Hilda Lucia Solis, Deni K.  
25 Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham,  
26 Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.’s One Legal, Nationwide Legal LLC,  
27 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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1 with Disabilities Act of 1990, Title III of the Americans with Disabilities Act of 1990, and all  
2 Defendants' misconduct, illegal actions, illegal acts, and transgressions were a violation of  
3 federal law.

4  
5 24. Plaintiff Alison Helen Fairchild alleges that private citizens and employees of private  
6 corporations InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores,  
7 Tatianna Simoes-Silva, and DOES 1-10 have all conspired to interfere with Plaintiff Fairchild's  
8 United States Fourteenth Amendment Due Process Clause and her constitutional civil rights that  
9 were protected under Titles II & III of the Americans with Disabilities Act of 1990 by  
10 conspiring with County of Los Angeles employees, officials, and peace officers to harm and  
11 cause injury to Plaintiff, recklessly.

12  
13 25. Plaintiff Alison Helen Fairchild hereby alleges that Defendants Hilda Lucia Solis, Deni  
14 K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham,  
15 Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.'s One Legal, Nationwide Legal LLC,  
16 Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10  
17 recklessly violated Fairchild's United States Fourteenth Amendment Due Process Clause  
18 constitutional civil rights and her civil rights protected under Titles II & III of the Americans  
19 with Disabilities Act of 1990 by them willfully, cruelly, carelessly, knowingly, wantonly,  
20 cruelly, recklessly, maliciously, deliberately, fraudulently, and callously committing reckless  
21 under color of law negligence, reckless under color of law negligence per se, and reckless under  
22 color of law gross negligence. Plaintiff Alison Helen Fairchild has alleged numerous other  
23 federal and California state law violations, including, but not limited to, Defendants' violations  
24 of 42 U.S.C. §§ 1983, 1985, 1986, 12101, 12132, 12203, & The Unruh Civil Rights Act,  
25 codified at California Civil Code § 51, *et seq.*

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1 **X. PARTIES**

2  
3 26. Plaintiff **ALISON HELEN FAIRCHILD** (hereinafter “**Fairchild**” or “**Plaintiff**”) is a  
4 resident of California and San Bernardino County. At the time of the filing of this original  
5 constitutional civil rights complaint and at all relevant times stated throughout this original  
6 federal civil rights complaint Plaintiff Fairchild was a California resident frequenting the  
7 Superior Court of California, County of Los Angeles, Stanley Mosk Superior Court to do  
8 research on Stanley Mosk Superior Court public terminals, to escort KING AROGANT to his  
9 court hearings and offer emotional support, to file and make copies on behalf of her fiancé  
10 KING AROGANT, and to get exercise outside of Stanley Mosk Courthouse for health reasons  
11 while she was present at the Stanley Mosk Courthouse. At all relevant times stated throughout  
12 this original federal civil rights complaint, Plaintiff Fairchild was a California resident who  
13 required the assistance of a Stanley Mosk Superior Court outside handicap ramp to safely arrive  
14 at the Stanley Mosk Superior Court second-floor entrance. Based upon the reckless under color  
15 of law negligence, reckless under color of law negligence per se, and reckless gross negligence  
16 done to her by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,  
17 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,  
18 InfoTrack US, Inc.’s One Legal, Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna  
19 Simoes-Silva, County of Los Angeles & DOES 1-10’s willful, knowing, wanton, reckless, cruel,  
20 fraudulent, malicious, careless, deliberate, and callous violations of the United States  
21 Constitution, the California Constitution, Plaintiff Fairchild’s United States Fourteenth  
22 Amendment Due Process constitutional civil rights and her civil rights protected under Titles II  
23 & III of the Americans with Disabilities Act of 1990. Plaintiff Fairchild was injured by all  
24 Defendants and recklessly deprived of her civil rights by all Defendants.

25  
26 27. At all times relevant hereto and stated throughout this original constitutional civil rights  
27 complaint, Plaintiff **ALISON HELEN FAIRCHILD** was an individual over 18 years old, a  
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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 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 IIED & AGAINST PRIVATE PARTY DEFENDANTS.

1 29. Plaintiff **ALISON HELEN FAIRCHILD** has an interest in this original constitutional  
2 civil rights action through the redress of her civil constitutional rights protected under the  
3 Fourteenth Amendment, Title II of the Americans with Disabilities Act of 1990. Fairchild has an  
4 interest in this original constitutional civil rights action based upon the reckless, illegal acts and  
5 actions done to Plaintiff Fairchild by Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn  
6 Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,  
7 InfoTrack US, Inc.'s One Legal, Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna  
8 Simoes-Silva, County of Los Angeles & DOES 1-10 that was in direct violation of 42 U.S.C. §  
9 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. §  
10 12203, and U.S.C.A. CONST. AMEND XIV.

11  
12 30. Plaintiff **ALISON HELEN FAIRCHILD** is a proper and appropriate party to this  
13 original constitutional civil rights action through her redress of her civil rights protected by the  
14 Fourteenth Amendment and Titles II & III of the Americans with Disabilities Act of 1990, and  
15 through all Defendants' willful, reckless, wanton, cruel, malicious, knowing, careless, callous,  
16 and deliberate actions alleged herein and throughout this original constitutional civil rights  
17 complaint that interfered, invaded, infringed upon, and deprived **Plaintiff ALISON HELEN**  
18 **FAIRCHILD** of her United States constitutional civil rights pursuant to 42 U.S.C. § 1983, 42  
19 U.S.C. § 1985, 42 U.S.C. § 1986, 42 U.S.C. § 12101, 42 U.S.C. § 12132, 42 U.S.C. § 12203,  
20 and the Due Process Clause of the Fourteenth Amendment of the United States Constitution, and  
21 the analogous provisions of California constitutional and statutory law. Plaintiff **ALISON**  
22 **HELEN FAIRCHILD** seeks compensatory damages, general damages, special damages, and  
23 punitive damages, for the individual Plaintiff **ALISON HELEN FAIRCHILD** on her behalf  
24 and for herself only.

25  
26 31. Defendant **HILDA LUCIA SOLIS (hereinafter "Solis")** is an elected County of Los  
27 Angeles supervisor who has jurisdiction and authority over all County of Los Angeles public  
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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 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.

19  
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  
27  
28

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

13  
14 33. Defendant **ROBERT G. LUNA (hereinafter "Luna")** is an elected County of Los  
15 Angeles peace officer who has jurisdiction and authority over all County of Los Angeles  
16 Sheriff's Department bureaus and divisions. Luna is gainfully employed by the County of Los  
17 Angeles, earning a total annual salary of approximately \$430,000 before taxes. Defendant Luna  
18 engaged in the reckless and wanton misconduct complained of herein while working in the  
19 course and scope of his employment with the County of Los Angeles. Defendant Luna is  
20 currently being sued in his official capacity as an employee of the County of Los Angeles and in  
21 his personal capacity as a citizen of the United States. Defendant Luna acted under the color of  
22 law by his illegal and unlawful actions, decisions, and misconduct of willfully, recklessly,  
23 maliciously, knowingly, carelessly, cruelly, and deliberately with callous indifference to  
24 Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights failed to stop and  
25 failed to intervene in an illegal and unlawful operation that has prevented Fairchild from safely  
26 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.

6  
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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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.

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

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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 scope of her employment with the County of Los Angeles. Defendant Butler is currently being  
2 sued in her official capacity as an employee of the County of Los Angeles and in her personal  
3 capacity as a citizen of the United States. Defendant Tinkham acted under the color of law  
4 through her illegal and unlawful actions, decisions, and misconduct of willfully, recklessly,  
5 maliciously, cruelly, knowingly, carelessly, and deliberately with callous indifference to  
6 Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights failed to stop and  
7 failed to intervene with an illegal and unlawful operation that has prevented Fairchild from  
8 safely using a Stanley Mosk outside handicap ramp and sidewalk since at least August 2025.  
9 Defendant Tinkham intentionally and recklessly violated Fairchild's United States Fourteenth  
10 Amendment Due Process Clause constitutional civil rights, her California Constitution Article I,  
11 § 7 constitutional civil rights, and her civil rights protected pursuant to Title II of the Americans  
12 with Disabilities Act of 1990. Defendant Tinkham resides in the County of Los Angeles.  
13 Defendant Tinkham is not entitled to any type, shape, or form of immunity.

14  
15 37. Defendant **FRANCISCO GARIBAY (hereinafter "Garibay")** is a County of Los  
16 Angeles employee who works as head board specialist for the County of Los Angeles Board of  
17 Supervisors' Executive Office located at 500 West Temple Street, Room 383, Los Angeles, CA  
18 90012. Garibay is gainfully employed by the County of Los Angeles, with a total annual salary  
19 of approximately \$ 114,648 before taxes. Defendant Garibay engaged in the reckless and  
20 wanton misconduct complained of herein while working in the course and scope of his  
21 employment with the County of Los Angeles. Defendant Garibay is currently being sued in his  
22 official capacity as an employee of the County of Los Angeles and in his personal capacity as a  
23 citizen of the United States. Defendant Garibay acted under the color of law through his illegal  
24 and unlawful actions, decisions, and misconduct of willfully, recklessly, maliciously, cruelly,  
25 knowingly, carelessly, and deliberately with callous indifference to Plaintiff Alison Helen  
26 Fairchild's federally protected constitutional civil rights failed to stop and failed to intervene  
27 with an illegal and unlawful operation that has prevented Fairchild from safely using a Stanley  
28

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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 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.

7  
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, e 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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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.

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 2<sup>nd</sup> 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 2<sup>nd</sup> 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

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

18  
19 **41. Defendant RAPID LEGAL INC. (hereinafter "RAPID LEGAL") (California**  
20 **Secretary of State Entity Number 1740805)** is a California corporation with its principal place  
21 of business located at 15345 Fairfield Ranch Road, Suite 200, Chino Hills, CA 91709.  
22 Defendant Rapid Legal is a corporation formed under the laws of the state of California. In the  
23 state of California, Rapid Legal Inc. does business as Rapid Legal. Rapid Legal's parent  
24 company is Proceed (still doing business as Counsel Press Holdings Inc.), which is a foreign  
25 corporation headquartered at 10 East 40<sup>th</sup> Street, 5<sup>th</sup> Floor, New York, NY 10016 and formed  
26 under the laws of the State of Delaware (**Delaware Division of Corporations Entity Number**  
27  
28

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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 **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.

15  
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  
28

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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 Flores intentionally and recklessly violated Fairchild’s United States Fourteenth Amendment  
2 Due Process Clause constitutional civil rights, her California Constitution Article I, § 7  
3 constitutional civil rights, and her civil rights protected pursuant to Title III of the Americans  
4 with Disabilities Act of 1990. Defendant Flores resides in the judicial district of this United  
5 States District Court. Defendant Flores is not entitled to any type, shape, or form of immunity.

6  
7 43. Defendant **TATIANNA SIMOES-SILVA (hereinafter “Silva”)** is a forty-something-  
8 year-old United States citizen who resides in the judicial district of this United States Court.  
9 Rapid Legal Inc. gainfully employs Defendant Silva as the company’s office manager.  
10 Defendant Silva engaged in the reckless and wanton misconduct complained of herein while  
11 working in the course and scope of her employment with Rapid Legal. Defendant Silva is  
12 currently being sued in her official capacity as an employee of Rapid Legal LLC and in her  
13 personal capacity as a citizen of the United States. Defendant Silva acted under the color of law  
14 by her illegal and unlawful actions, decisions, and misconduct of willfully, recklessly,  
15 maliciously, knowingly, cruelly, carelessly, and deliberately with callous indifference to  
16 Plaintiff Alison Helen Fairchild's federally protected constitutional civil rights failed to stop and  
17 failed to intervene in an illegal and unlawful operation that has prevented Fairchild from safely  
18 using a Stanley Mosk outside handicap ramp and sidewalk since at least August 2025.

19 Defendant Silva intentionally and recklessly violated Fairchild’s United States Fourteenth  
20 Amendment Due Process Clause constitutional civil rights, her California Constitution Article I,  
21 § 7 constitutional civil rights, and her civil rights protected pursuant to Title III of the Americans  
22 with Disabilities Act of 1990. Defendant Silva resides in the judicial district of this United  
23 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.

12  
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  
28

1 Angeles Sheriff's Department, which acted as an agent in the area of law enforcement,  
2 including, without limitation, conducting investigations, evaluating, and causing charges to be  
3 brought against alleged crimes, and condoning, allowing, and tolerating failed to stop and failed  
4 to intervene in an illegal and unlawful operation created by County of Los Angeles employees  
5 and private actors that has prevented Fairchild from safely using a Stanley Mosk outside  
6 handicap ramp and sidewalk since at least August 2025, in which these County of Los Angeles  
7 employees and private actors had all engaged in under color of law quasi-government activities  
8 as herein alleged by Plaintiff Fairchild.

9  
10 48. Plaintiff **ALISON HELEN FAIRCHILD** is unaware of the true and proper names of  
11 Defendants listed as DOES 1 through 10, inclusive, and therefore sues them by the fictitious  
12 preceding names. The plaintiff will amend his original constitutional civil rights complaint by  
13 inserting the proper names in place of the fictitious names, together with appropriate charging  
14 words, once the actual names are ascertained. Plaintiff Fairchild is informed and believes and  
15 thereon alleges that each of the Defendants designated herein as a DOE is responsible and liable  
16 to Plaintiff in some manner for the events, happenings, and contention referred to in this original  
17 constitutional civil rights complaint. All references herein to "Defendant or "Defendants" shall  
18 be deemed to include all DOE Defendants.

19  
20 49. Plaintiff **ALISON HELEN FAIRCHILD** is informed and believes and thereon alleges  
21 that each Defendant, including DOES 1 through 10, was and is the agent, employee, servant,  
22 subsidiary, partner, member, associate, co-conspirator, acquaintance, friend, ally, supporter,  
23 accessory, amigo, comrade, backer, abettor, instigator sympathizer, confidant or representative  
24 of each other Defendant, and that all of the things alleged to have been done in the course and  
25 scope of said agency, employment, service, subsidiary, partnership, membership, association,  
26 private citizen to local government relationship, or representative relationship and with the  
27  
28

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

11  
12 50. The allegations of this original constitutional civil rights complaint, based on information  
13 and belief, will likely have evidentiary support after a reasonable opportunity for further  
14 investigation and discovery. Such include issuing federal district court subpoenas duces tecum,  
15 the taking of oral depositions, and serving of pretrial discovery in the form of Requests for  
16 Admission and Special Interrogatories, all of which Plaintiff **ALISON HELEN FAIRCHILD**  
17 intends to conduct after the Rule 26(f) conference.

18  
19 **XII. CONTINUING VIOLATIONS**

20  
21 51. The wrongful acts and omissions giving rise to the Defendants' liability in this original  
22 constitutional civil rights action commenced on or about August 1, 2025, and have been and are  
23 "continuing" in nature as of the date of filing of this constitutional civil rights complaint on or  
24 about July 9, 2025. Plaintiff **ALISON HELEN FAIRCHILD**, therefore, **HEREBY** reserves her  
25 right to amend this original constitutional civil rights complaint (Into her FAC) as new and  
26 additional facts and claims arise or become known to Plaintiff Fairchild.

1  
2 **XIII. FACTS**

3  
4 **GENERAL ALLEGATIONS OF CONSTITUTIONAL CIVIL RIGHTS**  
5 **COMPLAINT IN SUPPORT OF PLAINTIFF ALISON HELEN FAIRCHILD**  
6 **CLAIMS FOR RELIEF, REQUESTED RELIEF & DAMAGES**

7  
8 52. Several times during the years 2015, 2016, 2017, and 2018 County of Los Angeles  
9 has willfully, recklessly, knowingly, cruelly, deliberately, carelessly, wantonly,  
10 fraudulently, and callously allowed legal document process servers, court document  
11 runners, legal courier messengers, and biker messengers employed by County of Los  
12 Angeles's longstanding co-conspirators Rapid Legal, ABC Legal, Pro Legal, United  
13 Legal, Countywide Process LLC, Nationwide Legal, First Legal, One Legal, and many  
14 other companies to impede, block, hijack, illegally occupy, obstruct Superior Court of  
15 California, County of Los Angeles, Stanley Mosk Superior Court entrances, exits, outside  
16 of Stanley Mosk courthouse handicap ramps, inside court hallways, inside court  
17 hallways, and the outside court handicap ramp leading to the 2nd Floor court entrance.  
18

19 53. On June 5, 2025, the County of Los Angeles recklessly filed a frivolous workplace  
20 violence petition against KING AROGANT. The petition In Superior Court of California,  
21 County of Los Angeles, Stanley Mosk Courthouse civil case **25STRO03574** was so frivolous  
22 that County of Los Angeles employees committed perjury on August 19, 2025 by testifying  
23 falsely that KING AROGANT entered the Alhambra DA office with aggressively holding  
24 scissors and then on April 17, 2025 confronted Brian MARK Rosenberg outside of the  
25 Alhambra DA office and trigged an Alhambra DA office evacuation. The frivolous petition  
26 further alleged that KING AROGANT had been arrested for sending emails to Brian MARK  
27 Rosenberg, a case which was later dismissed (**25CJCM02162-01**). KING AROGANT'S  
28

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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 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/I9DqwQWLgfU?si=gfPCydp9jH5hO8zF>  
8  
9

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](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.  
20

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 5<sup>th</sup> 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.

17  
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.

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

15  
16 ***“What are you doing, you stupid crippled bitch! Can’t you see we are working here!”***  
17

18 Fairchild’s body was visibly shaking after this individual approached her, so she left and  
19 went home instead of entering the Stanley Mosk Superior Court. The purpose of Fairchild’s  
20 court visit was to retrieve a copy of all court documents filed in frivolous civil case  
21 25STR03574 and file legal court pleadings on behalf of KING AROGANT on the fourth floor  
22 of the Stanley Mosk Courthouse. On information and belief, the individuals illegally occupying,  
23 trespassing, and willfully, recklessly, maliciously, carelessly, knowingly, deliberately, and  
24 callously blocking this entrance of this handicap ramp on September 15, 2025, were employed  
25 by Defendants Silva, Flores, Rapid Legal, Nationwide Legal, and One Legal.  
26  
27  
28

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

16  
17 Fairchild's body was visibly shaking after seeing numerous intimidating-looking men and  
18 a pit bull-looking dog blocking her path, so she left and went home instead of entering the  
19 Stanley Mosk Superior Court. The purpose of Fairchild's court visit was to retrieve a copy of  
20 minute orders from frivolous case 25STR03574 and visit the self-help clinic for family law on  
21 the 5<sup>th</sup> floor. On information and belief, the individuals illegally occupying, trespassing, and  
22 willfully, recklessly, maliciously, carelessly, knowingly, deliberately, and callously blocking the  
23 entrance of this handicap ramp on September 24, 2025, were employed by Defendants Silva,  
24 Flores, Rapid Legal, Nationwide Legal, and One Legal.

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

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

25  
26 61. On October 29, 2025, Fairchild left her home and travelled to the Stanley Mosk Superior  
27 Court by train. At approximately 2:20 PM, Fairchild arrived at the Stanley Mosk Courthouse's  
28

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 5<sup>th</sup> 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.

22  
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  

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

7  
8 *A copy of Fairchild's November 4, 2025, public comment was electronically served*  
9 *upon Holly J. Mitchell ([hollyjmitchell@bos.lacounty.gov](mailto:hollyjmitchell@bos.lacounty.gov) and Hilda Lucia Solis*  
10 *([firstdistrict@bos.lacounty.gov](mailto:firstdistrict@bos.lacounty.gov))*

11  
12 63. On November 10, 2025, Fairchild left her home and travelled to the Stanley Mosk  
13 Superior Court by train. At approximately 1:30 PM, Fairchild arrived at the Stanley Mosk  
14 Courthouse's outside handicap ramp so that she could use the handicap ramp to safely arrive at  
15 the courthouse's second-floor entrance. Fairchild was unable to use this handicap ramp due to  
16 numerous human beings leaning on, standing on, putting a chair on, hijacking, taking over and  
17 otherwise illegally occupying, trespassing, loitering, soliciting, and controlling this Stanley  
18 Mosk Courthouse handicap ramp while these same individuals were drinking alcohol, smoking  
19 marijuana, and smoking crystal methamphetamine in plain sight, and while incompetent peace  
20 officers were seated in their marked vehicles just feet away. Fairchild could smell marijuana and  
21 alcohol on these individuals. On November 10, 2025, Fairchild was unable to physically enter  
22 the handicap ramp that would help her safely arrive at the doorstep of the Stanley Mosk  
23 Courthouse's second-floor entrance because this handicap ramp that would help her travel to the  
24 second floor entrance was entirely blocked by several large boxes that had the following writing  
25 on them:  
26  
27  
28

1           **LEGAL LIT LLC**

2           **EXCELSIOR**

3           [www.excelsfordigital.com](http://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 5<sup>th</sup> 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.

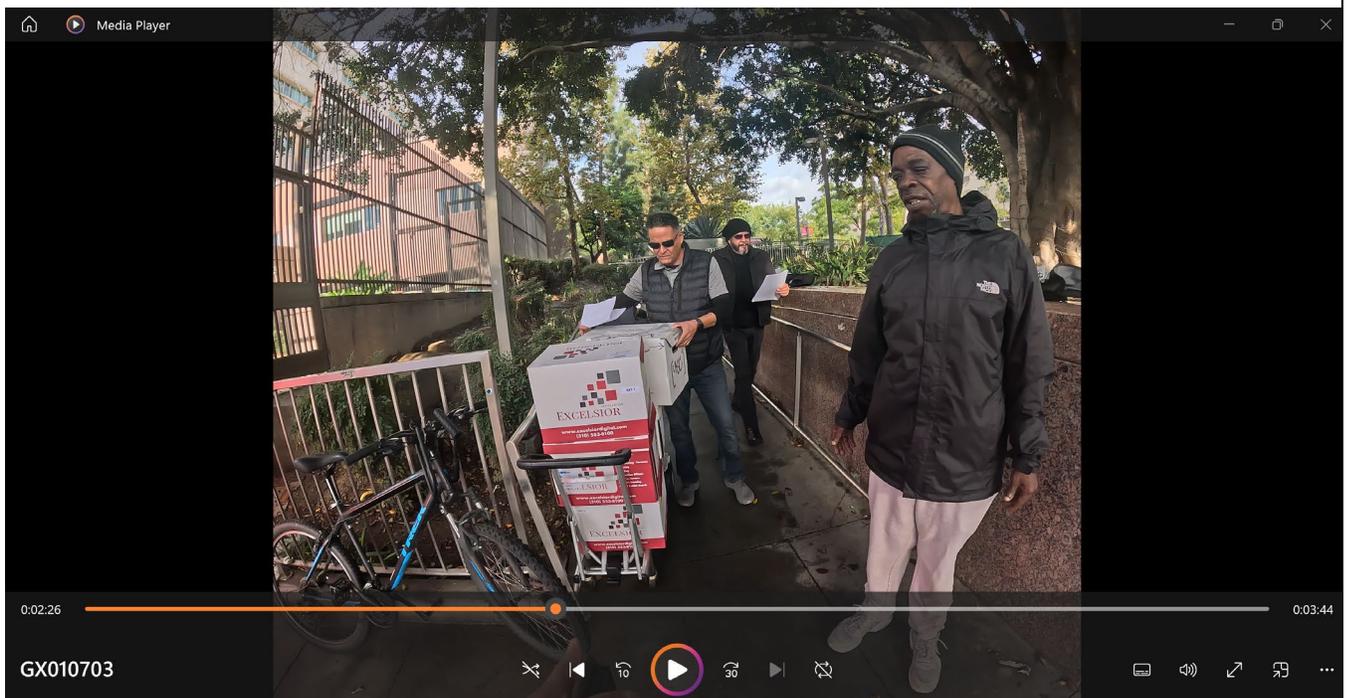
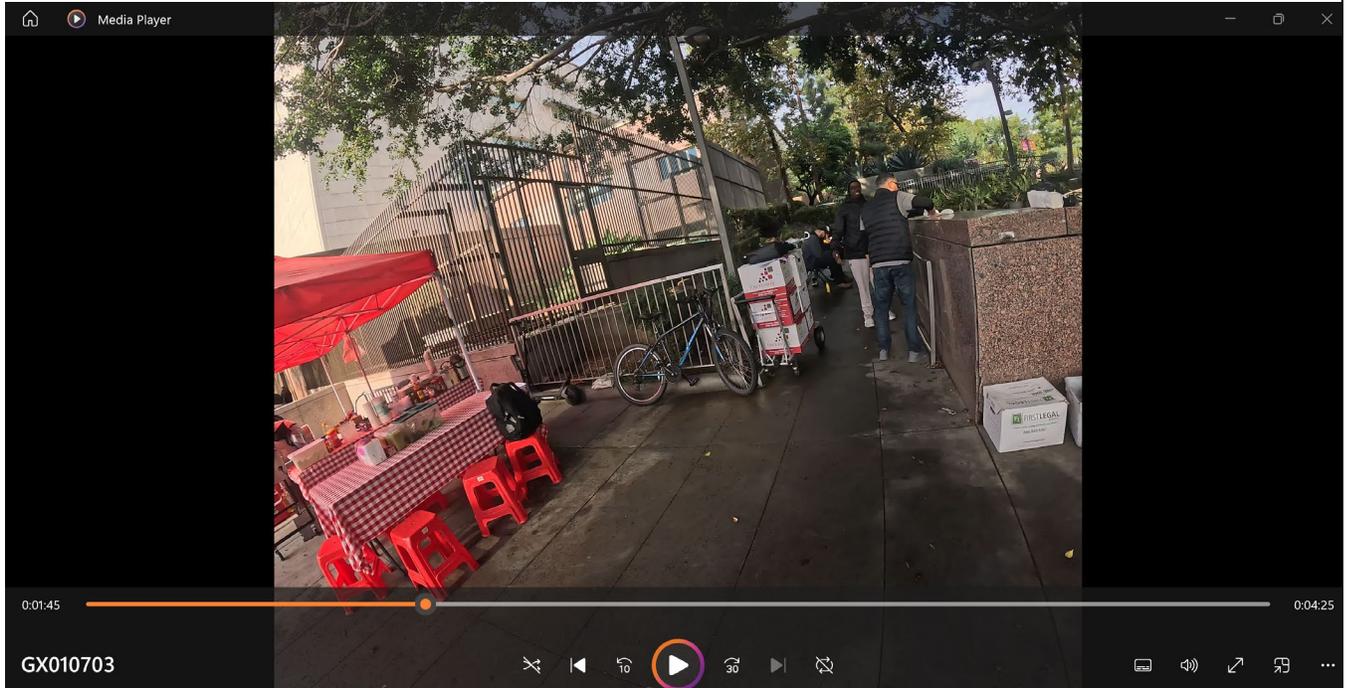
22  
23 65.       On the early morning of November 17, 2025, KING AROGANT left his home and  
24 travelled to the Stanley Mosk Superior Court by train. At approximately 7:45 AM, KING  
25 AROGANT arrived at the Stanley Mosk Courthouse’s outside handicap ramp so that he could  
26 film for evidence individuals who were willfully, knowingly, cruelly, wantonly, carelessly,  
27 recklessly, fraudulently, deliberately, and callously blocking Fairchild from using the handicap  
28

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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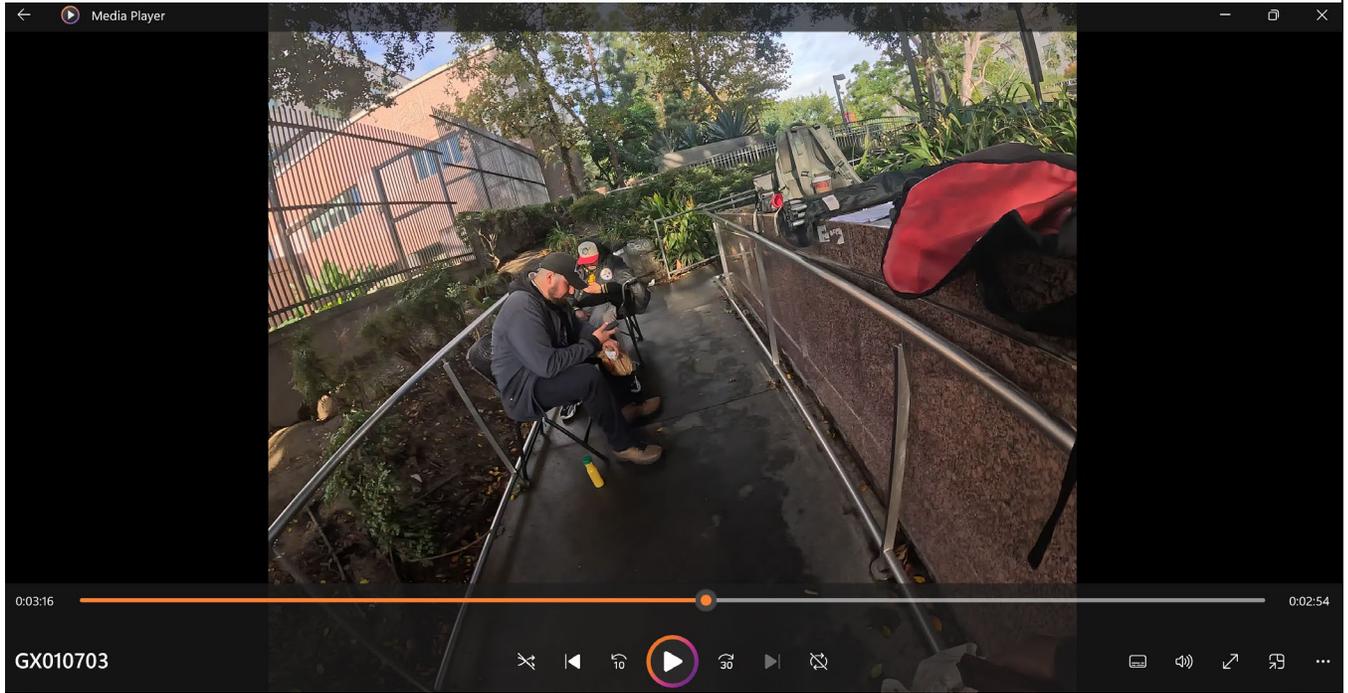
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Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 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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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.



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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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 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](mailto:hollyjmitchell@bos.lacounty.gov) and Hilda Lucia Solis***  
19 ***([firstdistrict@bos.lacounty.gov](mailto:firstdistrict@bos.lacounty.gov))***

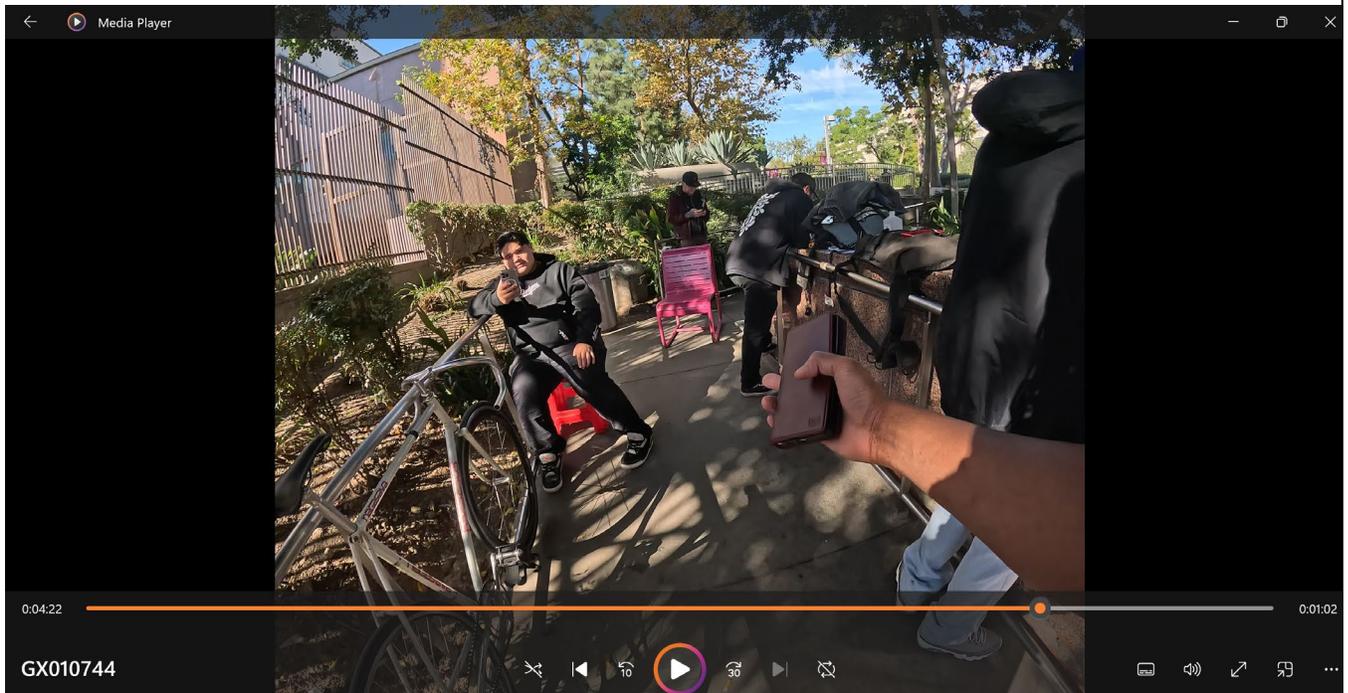
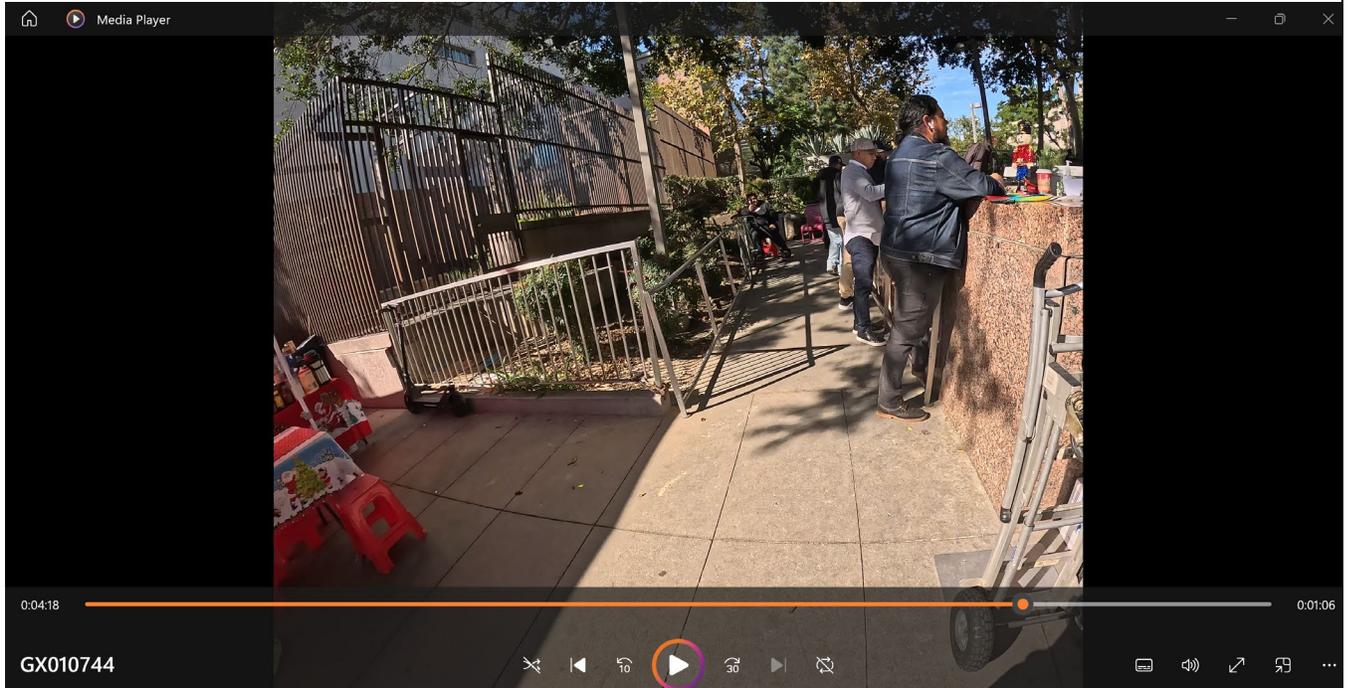
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21 69. On the early morning of December 2, 2025, KING AROGANT left his home and  
22 travelled to the Stanley Mosk Superior Court by train. At approximately 10:50 AM, KING  
23 AROGANT arrived at the Stanley Mosk Courthouse's outside handicap ramp 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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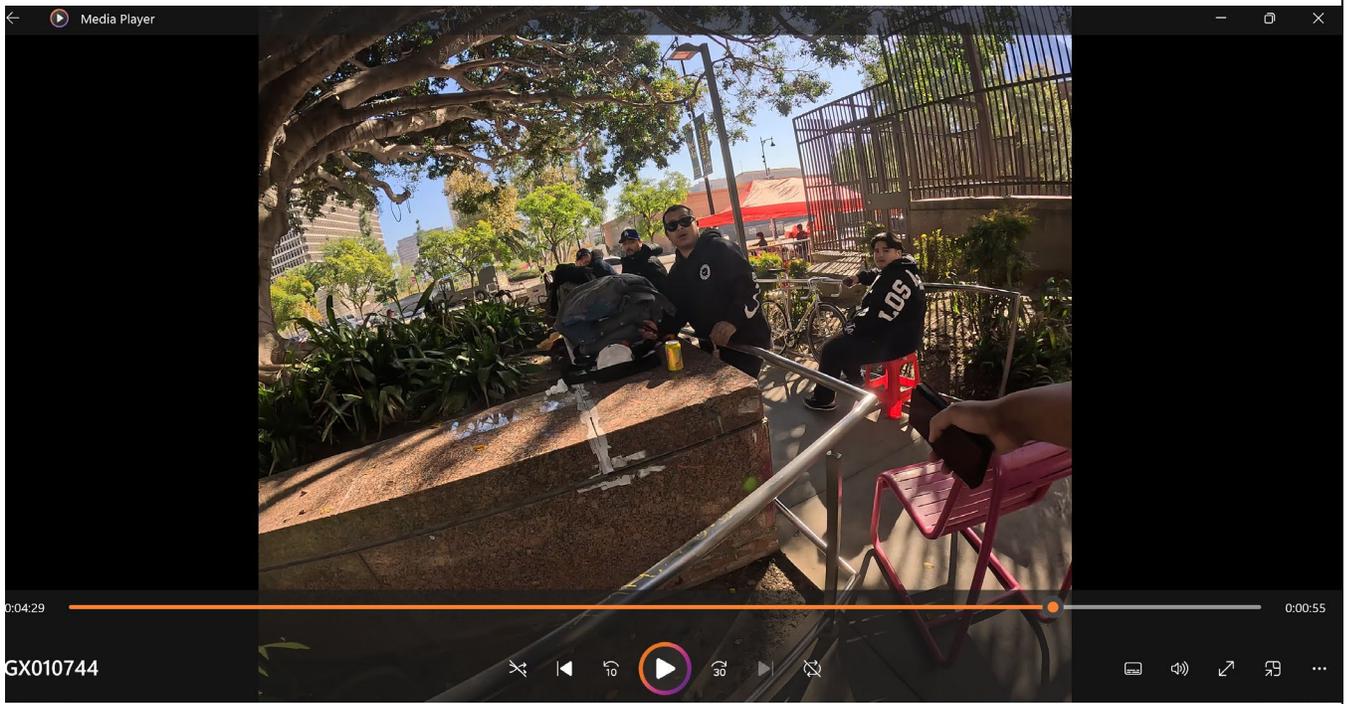
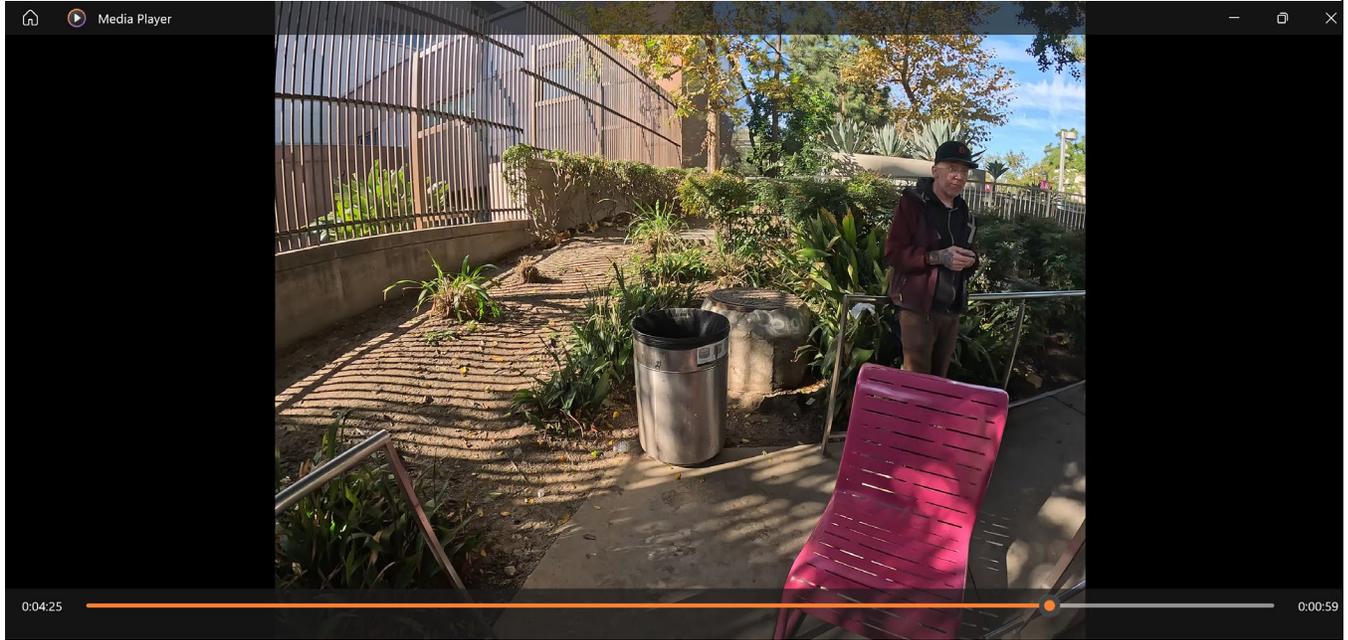
Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 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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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.

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

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4 [https://youtu.be/TV\\_SVbeCGmQ?si=17OzksFBfXzxZv1m](https://youtu.be/TV_SVbeCGmQ?si=17OzksFBfXzxZv1m)  
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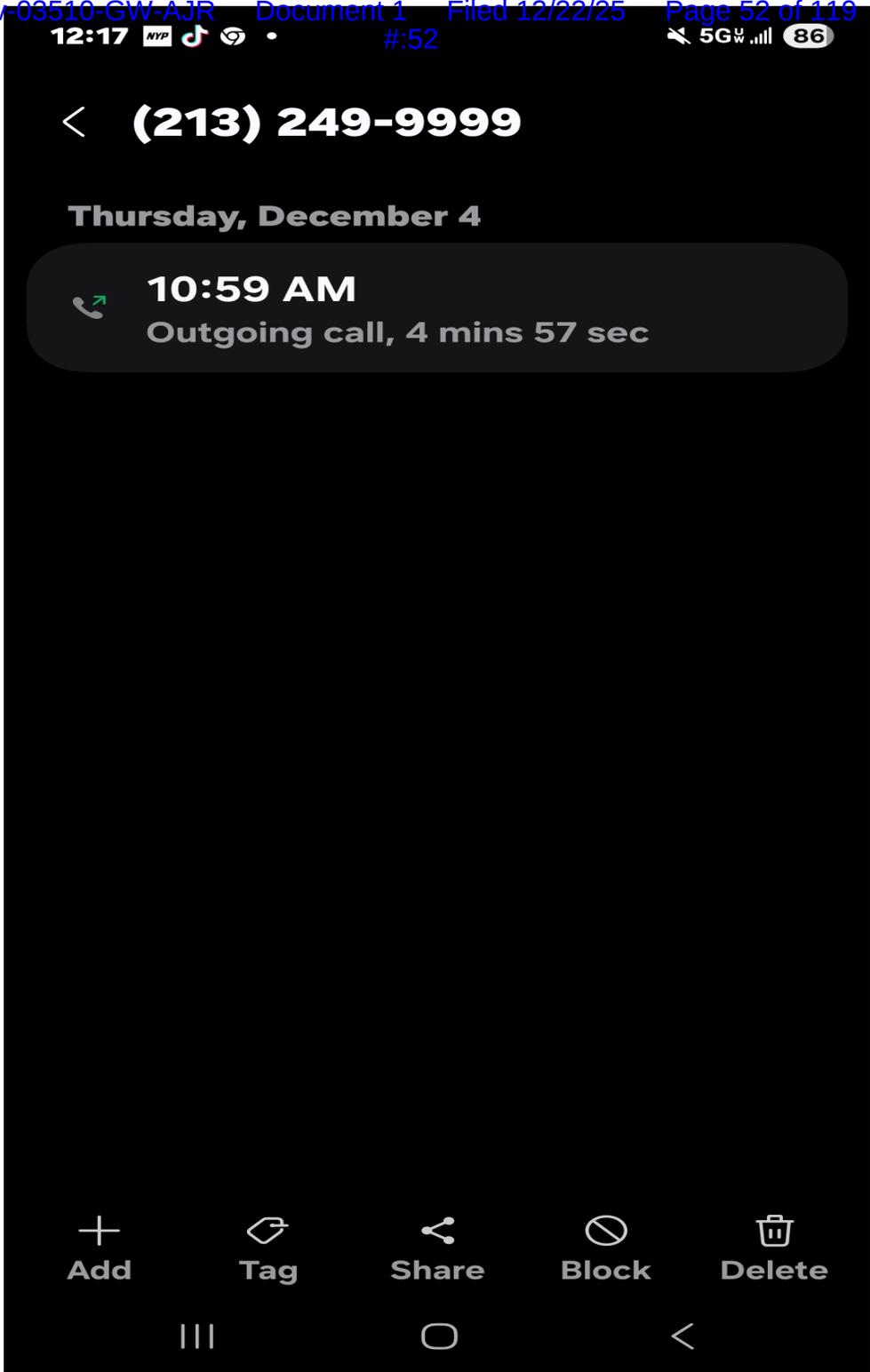
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7 70. On December 2, 2025, Fairchild submitted a public comment to all five County of Los  
8 Angeles board of supervisors (including Defendants Mitchell and Solis), warning them of legal  
9 action if they continued to allow employees of legal processing companies to block her access  
10 on the Stanley Mosk Superior Court. In her written public comment made part of the December  
11 2, 2025, public board meeting, Fairchild stated the following:

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

21  
22 ***A copy of Fairchild’s December 17, 2025, public comment was electronically served***  
23 ***upon Holly J. Mitchell ([hollyjmitchell@bos.lacounty.gov](mailto:hollyjmitchell@bos.lacounty.gov) and Hilda Lucia Solis***  
24 ***([firstdistrict@bos.lacounty.gov](mailto:firstdistrict@bos.lacounty.gov))***  
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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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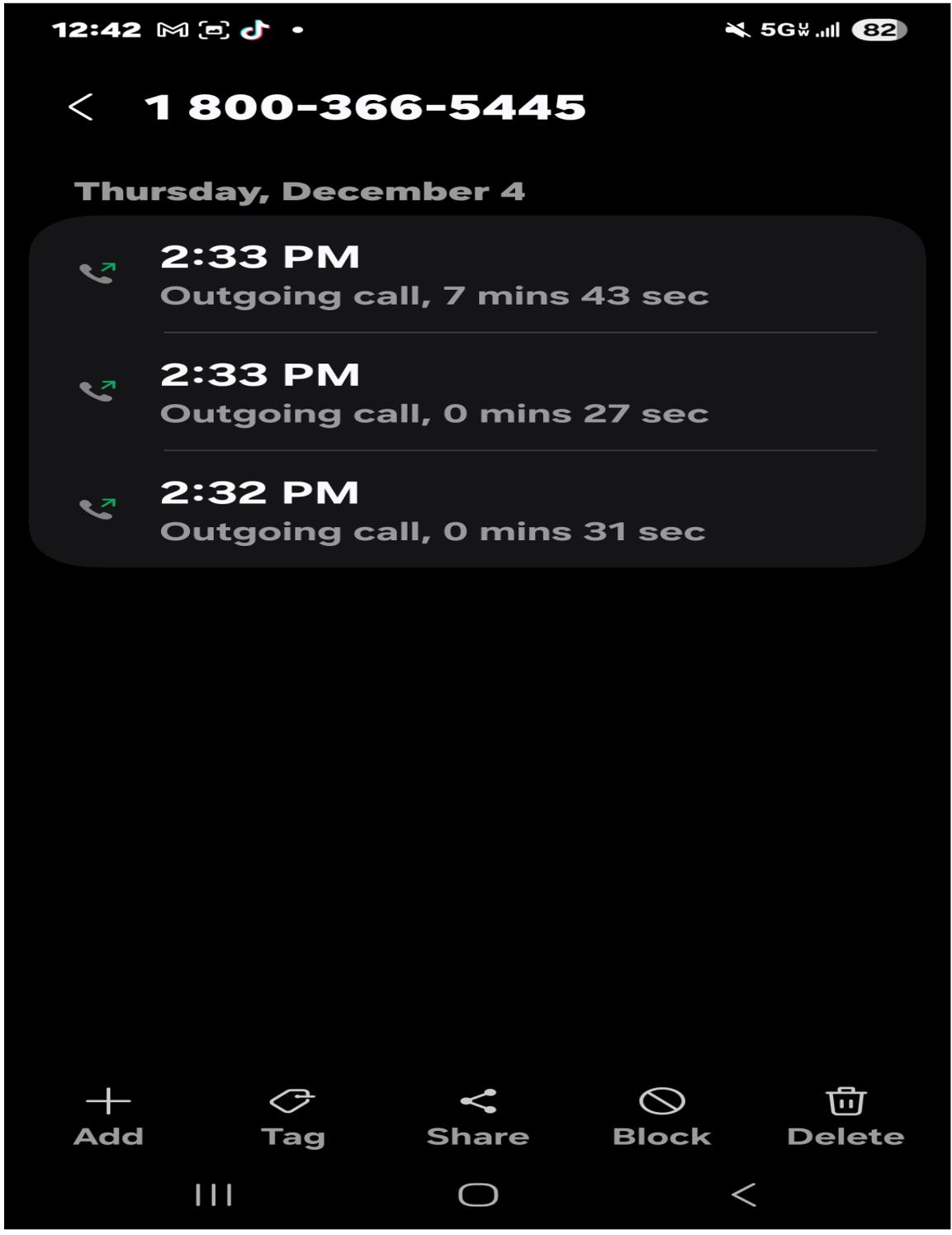
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1 73. On December 4, 2025, at approximately 2:33 PM, Fairchild, while being assisted by  
2 KING AROGANT, contacted Defendant Tatianna Simoes Silva by dialing 1.800.366.5445 and  
3 asking to speak with the person in charge. Fairchild told Defendant 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:  
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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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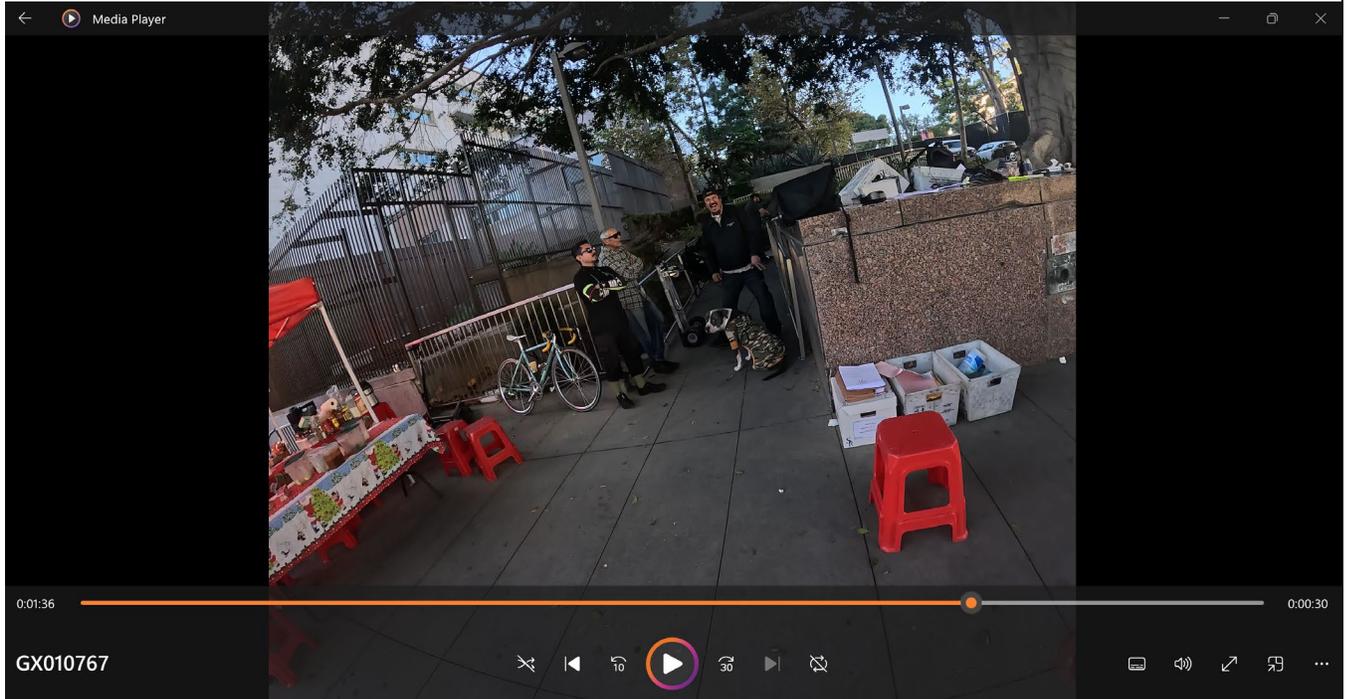
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1 74. On December 5, 2025, KING AROGANT left his home and travelled to the Stanley  
2 Mosk Superior Court by train. At approximately 3:00 PM, KING AROGANT arrived at the  
3 Stanley Mosk Courthouse's outside handicap ramp so that he could film for 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  
10 AROGANT himself had difficulty walking on the ramp as individuals were blocking the front  
11 entrance of the ADA ramp by standing on its guardrails and blocking it with themselves and a  
12 dog. On December 5, 2025, KING AROGANT also observed that these individuals had  
13 recklessly placed a large pink metal chair on the ramp to further discourage handicapped  
14 individuals from using it at all. It would have been impossible for Fairchild to safely pass  
15 through the ADA ramp, given the numerous individuals and chairs standing or seated on it.  
16 KING AROGANT told those individuals blocking the ramp that they could not be on the ramp  
17 and that his fiancée, Alison Helen Fairchild, had been trying to enter the handicap ramp, but  
18 they were all blocking it. KING AROGANT could smell marijuana and crystal  
19 methamphetamine coming from the individuals who were blocking the handicap ramp Fairchild  
20 needed to use to safely arrive at the second-floor entrance of the Stanley Mosk Superior Court.  
21 The individual with the dog who was standing near the entrance of the handicap ramp, while  
22 physically blocking it, looked very intimidating and would scare any disabled lady trying to  
23 enter it. On information and belief, the individuals illegally occupying, trespassing, and  
24 willfully, recklessly, maliciously, carelessly, knowingly, deliberately, and callously blocking  
25 this entrance of this handicap ramp on December 5, 2025, were employed by Defendants Silva,  
26 Flores, Rapid Legal, Nationwide Legal, and One Legal. See now *Exhibit 7*, a true and correct  
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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.

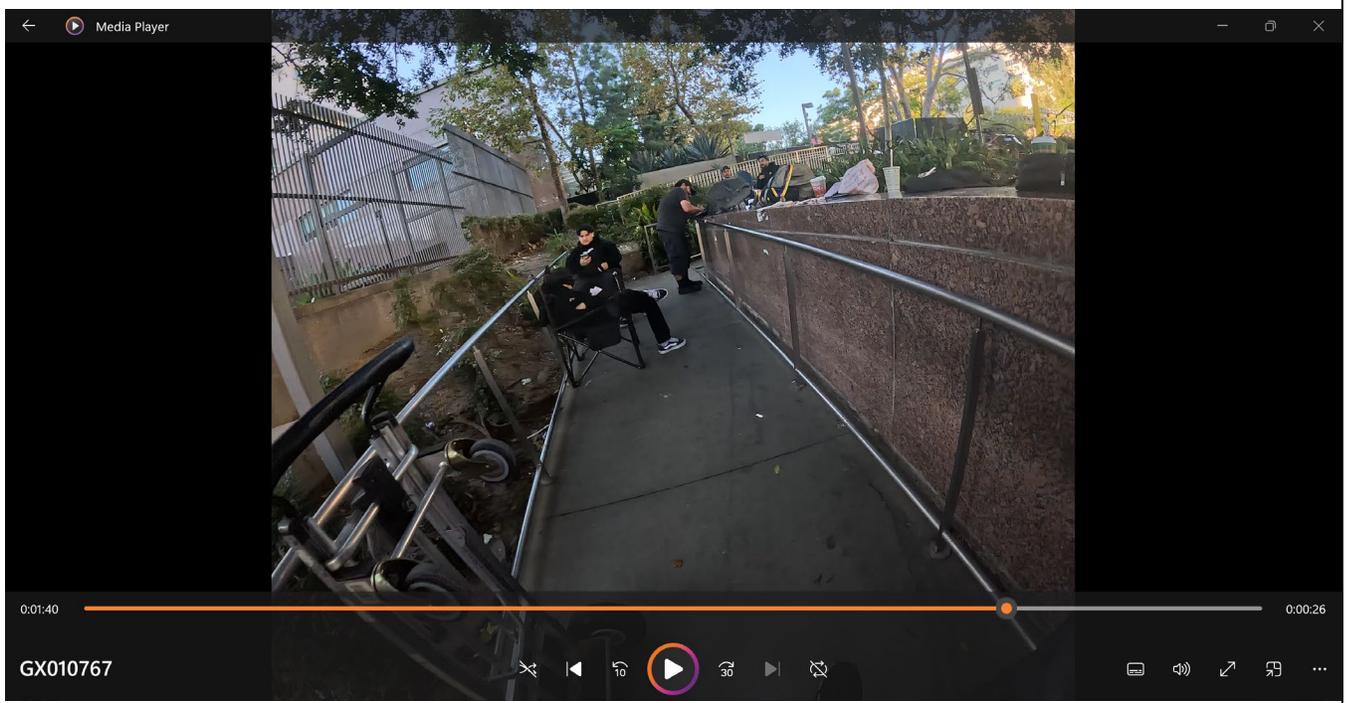
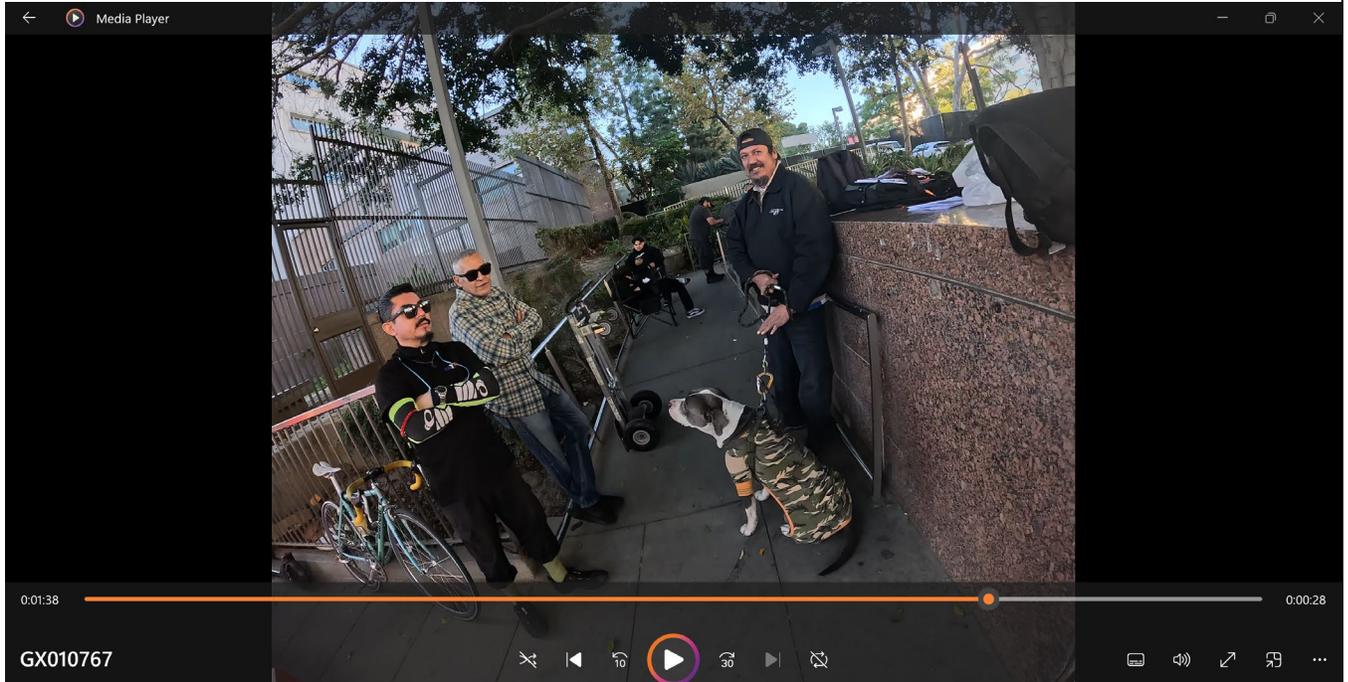
1 copy of several images taken from KING AROGANT’S GoPro camera’s GX010767 video  
2 recording that proves by clear and convincing evidence that several individuals are constantly  
3 illegally occupying a handicap ramp they had no business being on in the first place, attached  
4 hereto and below:  
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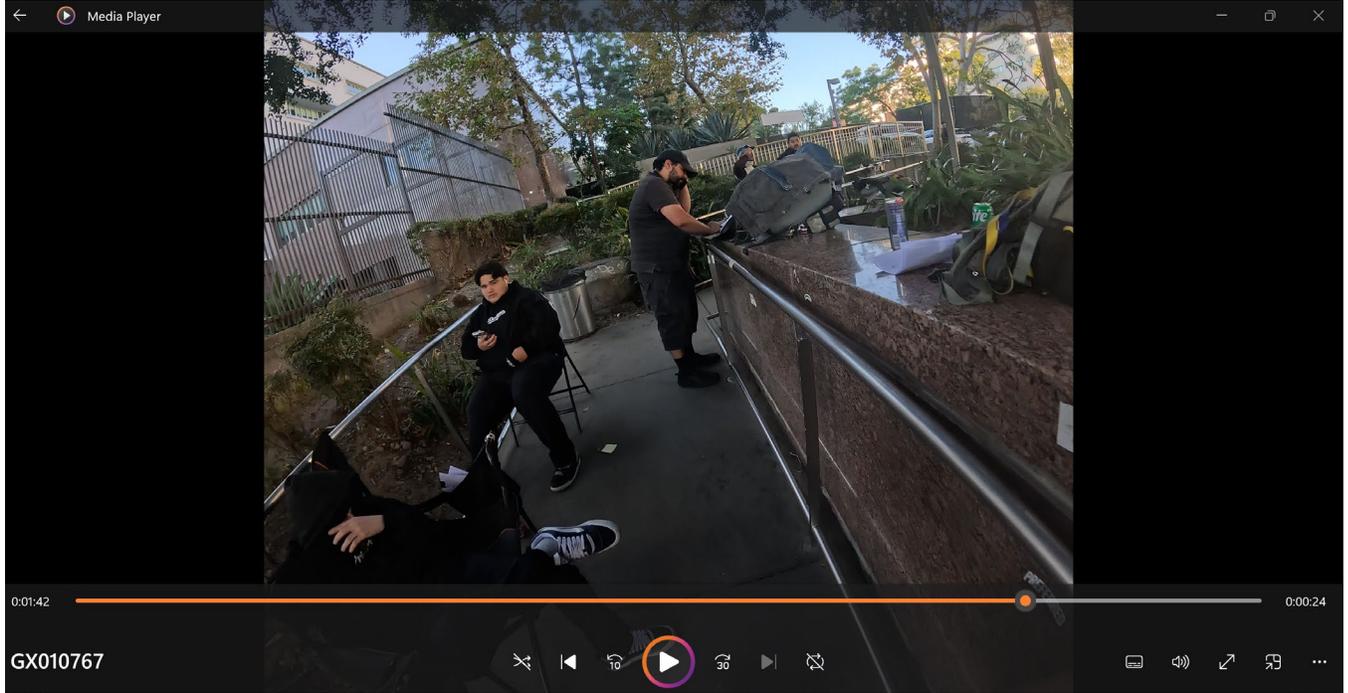
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Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 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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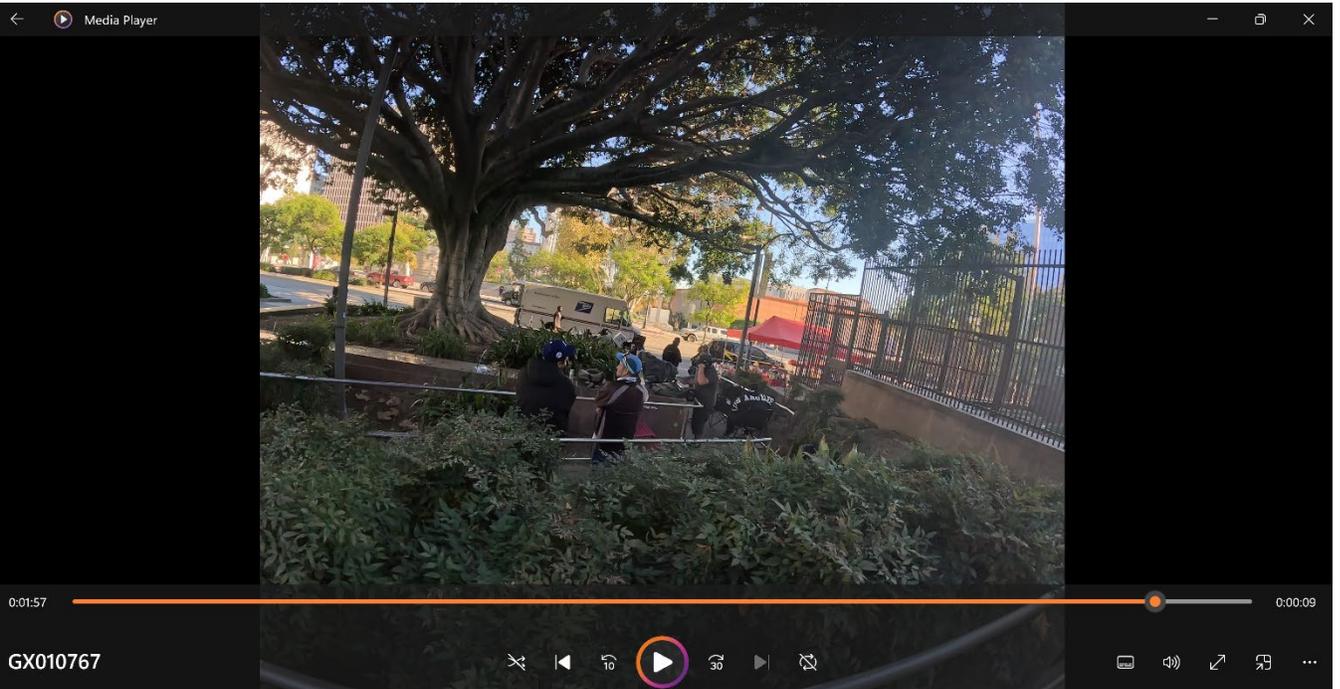
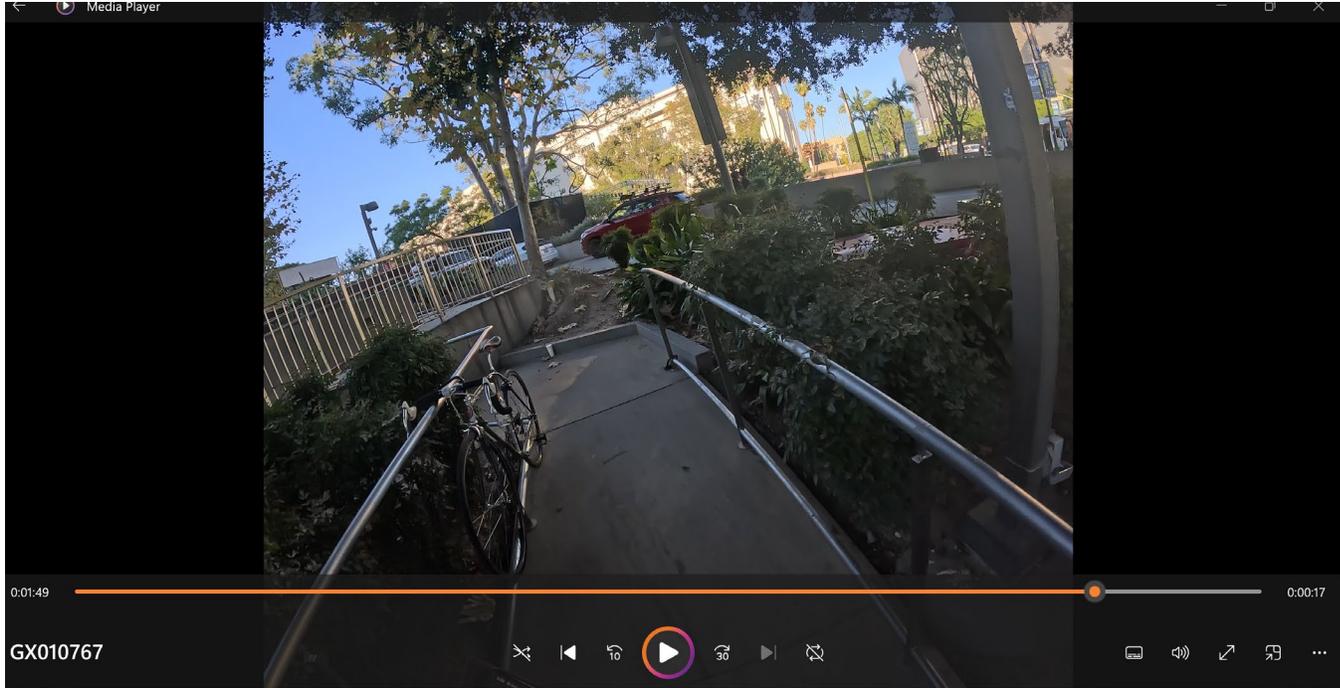
Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 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.

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1 See now attached hereto a true and correct copy of KING AROGANT’S December 5,  
2 2025, GoPro video recording’s YouTube weblink below and herein:

3  
4 [https://youtu.be/chU0wU4\\_UyE](https://youtu.be/chU0wU4_UyE)

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

17  
18 76. On December 9, 2025, Fairchild submitted a public comment to all five County of Los  
19 Angeles board of supervisors (including Defendants Mitchell and Solis), warning them of legal  
20 action if they continued to allow employees of legal processing companies to block her access  
21 on the Stanley Mosk Superior Court. In her written public comment made part of the December  
22 9, 2025, public board meeting, Fairchild stated the following:

23  
24 ***On the early morning of November 17, 2025, KING AROGANT was present at the***  
25 ***handicap ramp complained upon to this ridiculous board of supervisors panel. KING***  
26 ***AROGANT took photographs and video recordings that proved by clear and convincing***  
27

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](mailto:hollyjmitchell@bos.lacounty.gov) and Hilda Lucia Solis*  
8 *([firstdistrict@bos.lacounty.gov](mailto:firstdistrict@bos.lacounty.gov))*

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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](mailto:hollyjmitchell@bos.lacounty.gov) and Hilda Lucia Solis*  
27 *([firstdistrict@bos.lacounty.gov](mailto: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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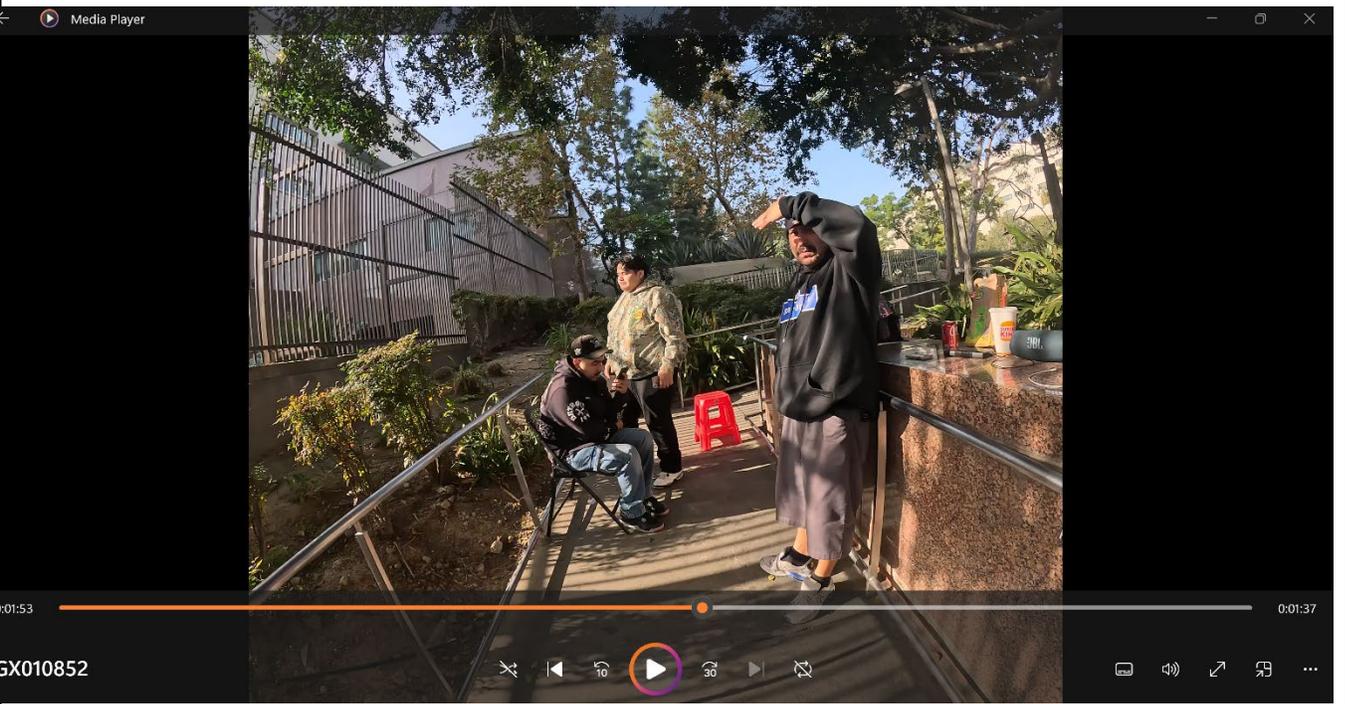
27  
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Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 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 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:  
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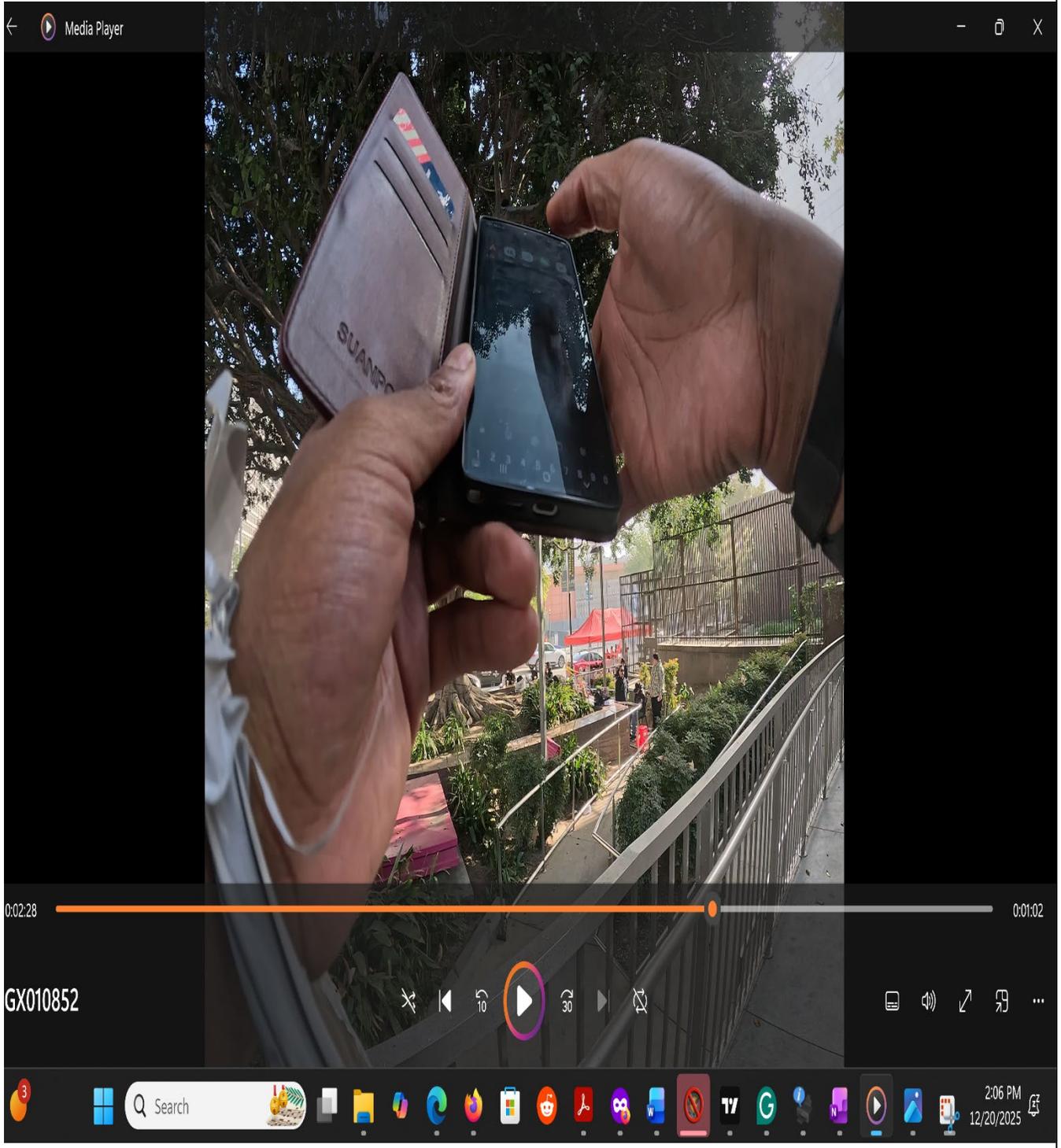
Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 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.

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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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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 See now attached hereto a true and correct copy of KING AROGANT’S December 17,  
2 2025, GoPro video recording’s YouTube weblink below and herein:

3  
4  
5 [https://youtu.be/VNaqVTQkJFw?si=J77zPWRyheFN\\_YPH](https://youtu.be/VNaqVTQkJFw?si=J77zPWRyheFN_YPH)

6  
7 79. On the afternoon of December 17, 2025, after arriving at the second-floor entrance of the  
8 Stanley Mosk Superior Court, KING AROGANT spoke to Defendant Gerardo Valdivia and  
9 requested his full name. Defendant Valdivia refused to give KING AROGANT his full name  
10 and then willfully, recklessly, maliciously, knowingly, cruelly, deliberately, fraudulently, and  
11 callously locked down the entire Stanley Mosk Superior Courthouse immediately and prevented  
12 any human beings inside from exiting or entering the courthouse on any of its three entrances on  
13 Hill Street (1<sup>st</sup> Floor entrance), Hill Street (2<sup>nd</sup> Floor entrance), and Grand Street (4<sup>th</sup> Floor  
14 entrance). Defendant Valdivia knew why KING AROGANT was requesting his full name after  
15 speaking with him on November 17, 2025. Defendant Valdivia received fair notice regarding the  
16 allegations alleged herein and throughout this civil rights complaint.

17  
18  
19 See now attached hereto a true and correct copy of KING AROGANT’S Defendant  
20 Valdivia December 17, 2025, GoPro video recording’s YouTube weblink below and herein:

21  
22 <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.

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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 82. At all times stated herein and throughout this original constitutional civil rights  
2 complaint, Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly  
3 J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia and DOES 1-  
4 10 recklessly violated the United States Constitution, and Fairchild’s United States Fourteenth  
5 Amendment constitutional civil rights while they were all gainfully employed, while they were  
6 all acting under unconstitutional policies, practices, procedures, customs, and traditions of local  
7 California municipal corporation County of Los Angeles, and while they were all bathed,  
8 clothed, covered, and draped under and in the color of law.

9  
10 83. Pursuant to 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 and DOES 1-10’s willful, knowing, careless, cruel, reckless, wanton, malicious, deliberate and  
13 callous violations of the United States Constitution as alleged throughout this original civil  
14 rights complaint Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,  
15 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia and  
16 DOES 1-10 are not entitled to any shape, form, or type of judicial, electoral, or prosecutorial  
17 immunity.

18  
19 **84. “An Act to enforce the Provisions of the Fourteenth Amendment**  
20 **to the Constitution of the United States, and for other Purposes.” 17**  
21 **Stat. 13. Allegation of facts constituting a deprivation under color of**  
22 **state authority of a right guaranteed by the Fourteenth Amendment**  
23 **satisfies to that extent the requirement of R.S. § 1979.**

24  
25 85. The illegal acts, actions, misdeeds, wrongdoings, misconduct, misbehavior, and  
26 transgressions of Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe,  
27 Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,  
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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 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

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)**

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

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

23  
24 94. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**  
25 **Violation (Count 5)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna,  
26 Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, LASD  
27  
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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  
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28

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,

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.

1 111. 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 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 14)**

13  
14 112. Which was reckless under color of law **Due Process Clause & Equal Protection Clause**  
15 **Violation (Count 14)** 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.

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

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

18  
19 115. As alleged herein, Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn  
20 Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,  
21 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-  
22 Silva, County of Los Angeles & DOES 1-10 were guilty of oppression and fraud. Plaintiff  
23 Fairchild should recover, in addition to actual damages, exemplary and punitive damages to  
24 make an example of and to punish Defendants in an amount according to proof.

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

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

17  
18 118. **WHEREFORE**, Plaintiff Alison Helen Fairchild demands judgment against Defendants  
19 Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole  
20 Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide  
21 Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles &  
22 DOES 1-100 on the first federal claim for relief of Plaintiff Alison Helen Fairchild's original  
23 civil rights complaint in the amount that will justly compensate Plaintiff for her compensatory,  
24 general, and special damages, together with costs and attorney's fees in this action.

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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.

**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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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 on, putting a chair on, hijacking, taking over and otherwise, illegally occupying, trespassing,  
2 loitering, soliciting, and controlling this Stanley Mosk Courthouse handicap ramp while these  
3 same individuals were drinking alcohol, smoking marijuana, and smoking crystal  
4 methamphetamine in plain sight on August 4, 2025, August 12, 2025, August 27, 2025,  
5 September 5, 2025, September 15, 2025, September 24, 2025, October 13, 2025, October 29,  
6 2025, November 4, 2025, November 10, 2025, November 17, 2025, December 2, 2025,  
7 December 5, 2025, and December 16, 2025 violated the United States Constitution and violated  
8 Fairchild's United States Fourteenth Amendment Due Process Clause and Equal Protection  
9 Clause constitutional civil rights **(Count 1-14)**, were under color of law negligence per se  
10 because all Defendants' reckless illegal acts, actions, misdeeds, wrongdoings, misconduct,  
11 misbehavior, and transgressions alleged in paragraphs 1-120 violated California Civil Code §  
12 51, et seq (Unruh Civil Rights Act, California Civil Code §§ 54-55.33 (California Disabled  
13 Persons Act), 42 U.S.C. § 12101, et seq, 42 U.S.C. § 12203, & 42 U.S.C. § 12132 and any other  
14 applicable state and federal law while they were all recklessly bathed, clothed, draped, and  
15 covered in, of and under the color of law.

16  
17 122. Which was reckless under color of law (42 U.S.C. § 1983) **NEGLIGENCE PER SE**  
18 **(Count 1-14)** done by Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn  
19 Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia,  
20 InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-  
21 Silva, County of Los Angeles & DOES 1-10 by them using, by them doing, by them executing,  
22 by them directing, by them employing, by them manipulating, and otherwise engaging in  
23 illusory and manipulated illegal acts of deceit, deception, fraud, conspiracies, concealment, and  
24 corruption to gain an unfair, unjust, unlawful, illegal, and unconstitutional advantage over  
25 Plaintiff Alison Helen Fairchild.

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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.

1 123. Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J.  
2 Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US,  
3 Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of  
4 Los Angeles & DOES 1-10 reckless under color of law illegal acts alleged throughout this  
5 original constitution civil rights complaint in paragraphs 1-122 and alleged herein, were under  
6 color of law Due Process Clause & Equal Protection Clause constitutional violations (**Count 1-**  
7 **14**), under color of law **NEGLIGENCE PER SE**, were a reckless violation of the United States  
8 Constitution, were a reckless violation of Fairchild’s United States Fourteenth Amendment Due  
9 Process Clause & Equal Protection Clause constitutional civil rights, and a violation of federal  
10 law.

11  
12 124. As a further direct, foreseeable, and proximate result of said wrongful reckless, wanton,  
13 malicious, cruel, knowing, careless, willful, deliberate, and callous acts done by Defendants  
14 Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole  
15 Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide  
16 Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles &  
17 DOES 1-10. Plaintiff Fairchild has incurred attorney’s fees in an amount to be determined, for  
18 which Plaintiff claims a sum to be established according to proof.

19  
20 125. As alleged herein, Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn  
21 Kehoe, 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 were guilty of oppression and fraud. Plaintiff  
24 Fairchild should recover, in addition to actual damages, exemplary and punitive damages to  
25 make an example of and to punish Defendants in an amount according to proof.  
26  
27  
28

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

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

17  
18 128. **WHEREFORE**, Plaintiff Alison Helen Fairchild demands judgment against Defendants  
19 Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole  
20 Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide  
21 Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles &  
22 DOES 1-10 on the second federal claim for relief of Plaintiff Alison Helen Fairchild's original  
23 civil rights complaint in the amount that will justly compensate Plaintiff for her compensatory,  
24 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).

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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.

1 132. Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J.  
2 Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US,  
3 Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of  
4 Los Angeles & DOES 1-10 had a meeting of minds to violate Fairchild's United States  
5 constitutional Fourteenth Amendment rights, her ADA rights (Title II & III of the Americans  
6 with Disabilities Act of 1990), and her California Constitution Article I, § 7 rights under color of  
7 law by interfering with and depriving Fairchild of her civil rights in furtherance of Defendants'  
8 conspiracy to use under color of Due Process Clause violations, under color of law Equal  
9 Protection Clause violations, and under color of law negligence per se to willfully, recklessly,  
10 wantonly, cruelly, knowingly, carelessly, deliberately, and callously allow, tolerate, ratify,  
11 permit, acquiesce, and overlook 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 August 4, 2025, August 12, 2025, August 27, 2025, September 5, 2025, September 15, 2025,  
16 September 24, 2025, October 13, 2025, October 29, 2025, November 4, 2025, November 10,  
17 2025, November 17, 2025, December 2, 2025, December 5, 2025, and December 16, 2025

18  
19 133. Plaintiff Alison Helen Fairchild has suffered numerous injuries and deprivation of her  
20 constitutional civil rights due to the under color of law 42 U.S.C. § 1985 violations and federal  
21 law violations by Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J.  
22 Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US,  
23 Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of  
24 Los Angeles & DOES 1-10.

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26  
27 134. That because of the foregoing, **ALISON HELEN FAIRCHILD** suffered physical and  
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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 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.

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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.

1 142. 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.

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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.

1 148. 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**

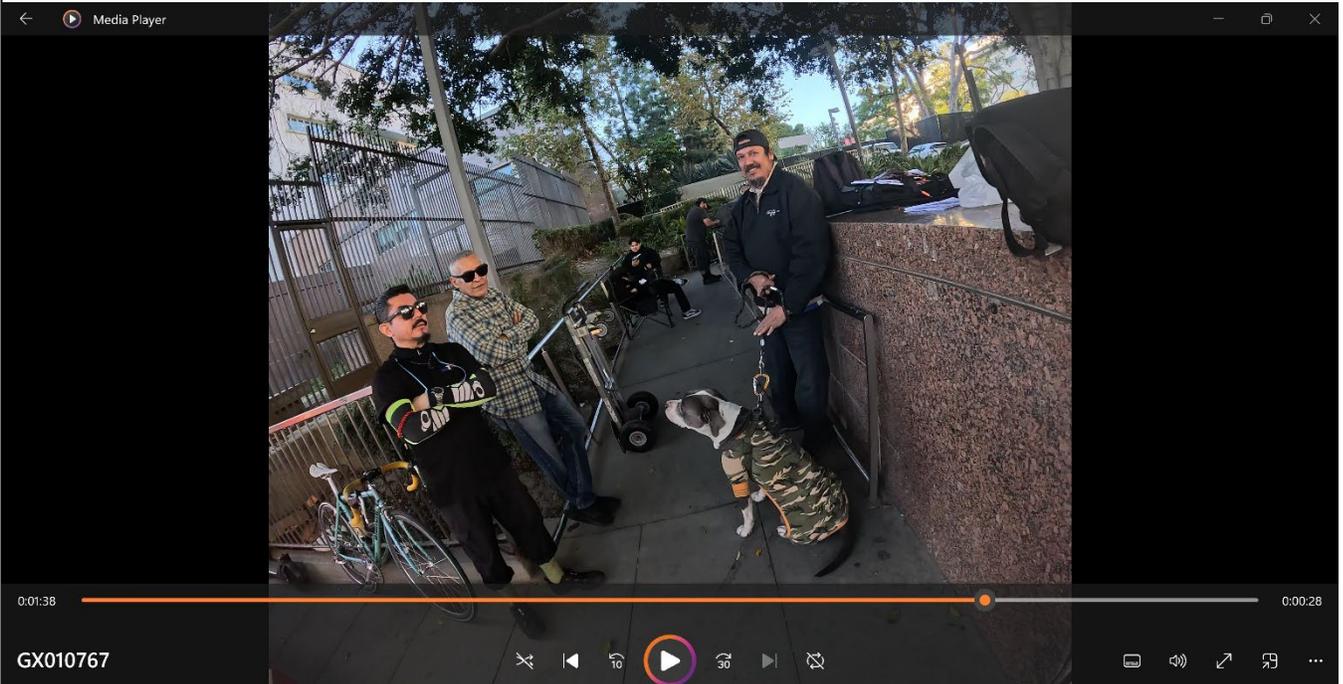
152. Plaintiff Alison Helen Fairchild hereby restates, reincorporates, reiterates, realleges, and incorporates by reference previous paragraphs 1-151 of this original civil rights complaint herein.

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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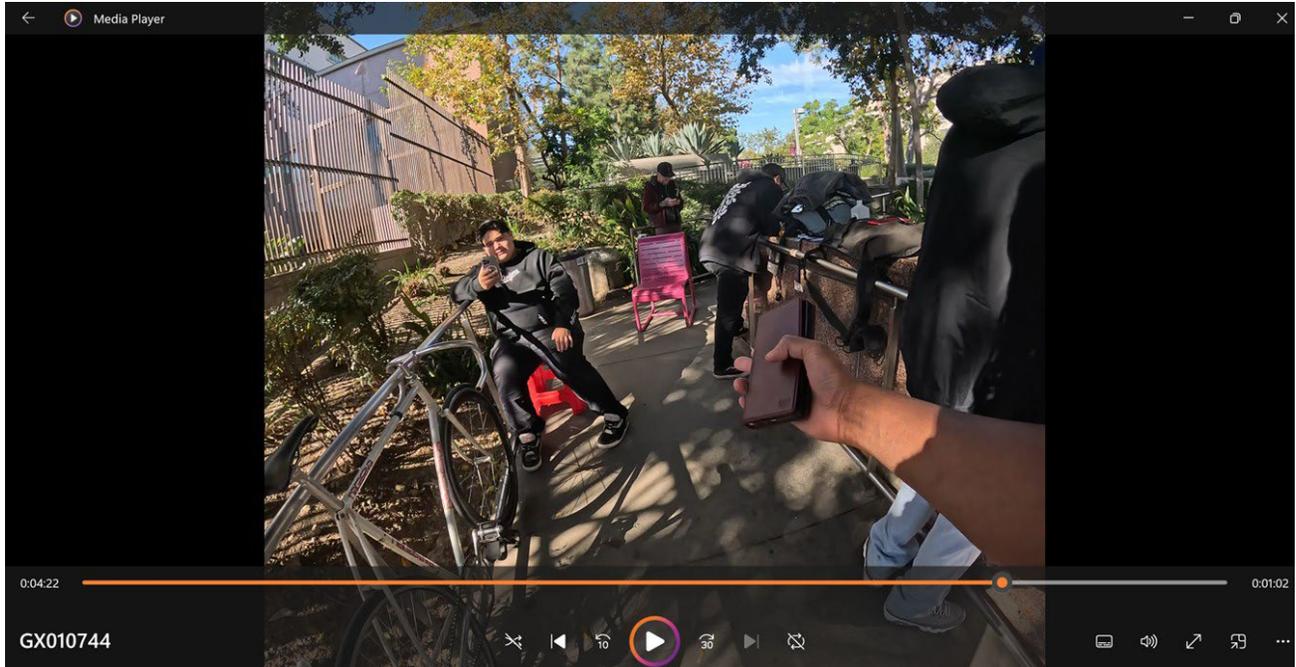
Verified Original Civil Rights Complaint for Injunctive Relief, Declaratory Relief, General Damages, Compensatory Damages, Punitive Damages, & Special Damages for Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE], Violation of 42 U.S.C. § 1983 [UNDER COLOR OF LAW NEGLIGENCE PER SE], 42 U.S.C. § 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 persons from using and entering the ADA handicap ramp located at 111 North Hill Street, Los  
2 Angeles, CA 90012.



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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.



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,

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 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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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.

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

12  
13 156. **WHEREFORE**, Plaintiff Alison Helen Fairchild demands judgment against Defendants  
14 Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole  
15 Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide  
16 Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles &  
17 DOES 1-10 on the seventh claim for relief of Plaintiff Alison Helen Fairchild’s original civil  
18 rights complaint in the amount that will justly compensate Ms. Fairchild for her compensatory,  
19 general, and special damages, together with costs and attorneys’ fees in this action.

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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.

**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 IIED & 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.

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.

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

5  
6 165. Plaintiff Alison Helen Fairchild hereby restates, reincorporates, reiterates, realleges, and  
7 incorporates by reference previous paragraphs 1-164 of this original civil rights complaint  
8 herein.

9  
10 166. The reckless and callous illegal acts, illegal actions, misdeeds, wrongdoings, misconduct,  
11 misbehavior, transgressions, violations, and misdoings of Defendants Hilda Lucia Solis, Deni K.  
12 Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham (Nicole  
13 Amber Davis-Tinkham and her co-conspirators), Francisco Garibay (Defendant has an  
14 extremely close work relationship with Defendants Tinkham, Solis & Mitchell), and Gerardo  
15 Valdivia (peace officer in charge of day to day operations of the Superior of California, County  
16 of Los Angeles, Stanley Mosk Superior Court) as alleged throughout this original constitutional  
17 civil rights complaint (**paragraphs 1-165**) were done pursuant to one or more interrelated  
18 policies, rules, practices, and/or customs of the Defendant County of Los Angeles, its County of  
19 Los Angeles Sheriff's Department, its County of Los Angeles Office of County Counsel, its  
20 Superior of California, its County of Los Angeles Operations of thirty-six courthouses (Deni K.  
21 Butler), and its County of Los Angeles Executive Office and Board of Supervisors.

22  
23 167. At all times material and relevant to this original civil rights complaint, Defendant  
24 County of Los Angeles, and its County of Los Angeles Sheriff's Department, its County of Los  
25 Angeles Office of County Counsel, its Superior Court of California, County of Los Angeles  
26 Operations of thirty-six courthouses, and its County of Los Angeles Executive Office and Board  
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 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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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 Los Angeles Board of Supervisors, including but not limited to Defendants Hilda Lucia Solis,  
2 Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-  
3 Tinkham, Francisco Garibay, Gerardo Valdivia & DOES 1-10.

4  
5 168. The County of Los Angeles's policies, practices, procedures, traditions, rules, and  
6 customs of encouraging, condoning, consenting to, approving, and tolerating its peace officers,  
7 Sheriff, County of Los Angeles Superior Court employees, and County of Los Angeles Board of  
8 Supervisors to fail to investigate unconstitutional actions of its peace officers and employees and  
9 execution of under color of law reckless violations of California Civil Code § 51, *et seq* (Unruh  
10 Civil Rights Act, California Civil Code §§ 54-55.33 (California Disabled Persons Act), 42  
11 U.S.C. § 12132 *et seq*, 42 U.S.C. § 12203, Title II of the Americans with Disabilities Act of  
12 1990, the California Constitution, and the United States Constitution. Accordingly, the County  
13 of Los Angeles prioritizes and values its own policies, practices, procedures, traditions, rules,  
14 and customs over the United States' Fourteenth Amendment Due Process Clause constitutional  
15 civil rights and Title II of the Americans with Disabilities Act of 1990 constitutional civil rights  
16 of United States citizens who are wrongfully mistreated and discriminated against on public  
17 property owned by the County of Los Angeles.

18  
19 169. These illegal, illicit, unlawful, unconstitutional, cruel, fraudulent, deceitful, and  
20 incompetent County of Los Angeles policies, practices, procedures, rules, traditions, and  
21 customs encouraged the above County of Los Angeles misconduct and was both separately and  
22 together, the moving force and a direct and proximate cause of the unconstitutional acts  
23 committed by Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J.  
24 Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia & DOES 1-10,  
25 and the injuries and damages sustained by Plaintiff Alison Helen Fairchild.

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

11  
12 171. The County of Los Angeles can reasonably be said to have policies, practices,  
13 procedures, traditions, rules, and customs encouraged by the above misconduct of County of  
14 Angeles Office of County Counsel, Sheriff Robert G. Luna and all his Assistant Sheriffs and  
15 Commanders, County of Los Angeles Sheriff's Department peace officers, County of Los  
16 Angeles Superior Court employees and County of Los Angeles Board of Supervisors'  
17 employees (such as head board specialist Francisco Garibay); and encouraged by the County of  
18 Los Angeles Board of Supervisors and County of Los Angeles Executive Office's misconduct  
19 that has been alleged to have occurred between August 1, 2025 and December 17, 2025, only.

20  
21 172. **WHEREFORE**, pursuant to 42 U.S.C. § 1983, Plaintiff Alison Helen Fairchild demands  
22 actual or compensatory damages against Defendant County of Los Angeles plus the costs of this  
23 action, attorneys' fees, and such other and further relief that the Court deems just and proper.

1 **XV. REQUEST FOR INJUNCTIVE RELIEF**

2  
3 173. Plaintiff Alison Helen Fairchild hereby restates, reincorporates, reiterates, realleges, and  
4 incorporates by reference previous paragraphs 1-172 of this original civil rights complaint  
5 herein.

6  
7 174. 42 U.S.C. § 1983, 42 U.S.C. 1985, and the Fourteenth Amendment of the United States  
8 Constitution authorizes this Court to issue a permanent injunction against Hilda Lucia Solis,  
9 Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-  
10 Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC,  
11 Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 for  
12 their reckless violations of 42 U.S.C. §§ 1983, 1985, and U.S.C.A. CONST. AMEND XIV, and,  
13 in the exercise of its equitable jurisdiction, to order such ancillary relief as a temporary  
14 injunction, preliminary injunction, United States citizen redress, and appropriate damages  
15 resulting from Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J.  
16 Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US,  
17 Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of  
18 Los Angeles & DOES 1-10 reckless, willful, wanton, malicious, careless, knowing, deliberate  
19 and callous acts or practices, cruel and callous course of conduct and other remedial measures.

20  
21 175. The Fourteenth Amendment of the United States Constitution, 42 U.S.C. § 1983, & 42  
22 U.S.C. § 1985 authorizes the United States District Court of Central District of California to  
23 ORDER AN INJUNCTION RESTRAINING IMMEDIATELY Defendants Hilda Lucia Solis,  
24 Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-  
25 Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC,  
26 Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10  
27 from further violating Fairchild's constitutional civil rights, and **immediately ISSUE AN**

28  

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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.

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

3  
4 178. **WHEREFORE**, Plaintiff Alison Helen Fairchild demands injunctive judgment against  
5 Defendants Hilda Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell,  
6 Nicole Amber Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc.,  
7 Nationwide Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los  
8 Angeles & DOES 1-10 together with costs and attorney’s fees in this action.

9  
10  
11  
12 **XVI. PRAYER FOR RELIEF**

13  
14 **WHEREFORE**, Plaintiff Alison Helen Fairchild respectively prays for judgment on the  
15 above-alleged claims for relief against Defendants Hilda Lucia Solis, Deni K. Butler, Robert G.  
16 Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco Garibay,  
17 Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores,  
18 Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 as follows:

- 19  
20  
21 1. Statutory disbursements, costs, expert fees, and attorney’s fees authorized under 42  
22 U.S.C. § 1988(b), and such further and other relief as the Court deems just and proper.

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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 2. Pursuant to 42 U.S.C. § 18116, award compensatory damages, general damages, and  
2 special damages to Plaintiff Alison Helen Fairchild in an amount determined by the jury  
3 that would fully compensate Ms. Fairchild for the injuries, emotional harm, mental  
4 anguish, embarrassment, humiliation, and degradation caused by Defendants Hilda Lucia  
5 Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber  
6 Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide  
7 Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles  
8 & DOES 1-10.  
9
- 10 3. Pursuant to 42 U.S.C. § 18116, award punitive damages to Plaintiff Alison Helen  
11 Fairchild in an amount determined by the jury, but no less than three times the amount of  
12 actual damages, which would punish all the above-stated Defendants Hilda Lucia Solis,  
13 Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-  
14 Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal  
15 LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles &  
16 DOES 1-10.  
17
- 18 4. Pursuant to 42 U.S.C. § 1983, award compensatory damages, special damages, and  
19 general damages to Plaintiff Alison Helen Fairchild in an amount determined by the jury  
20 that would fully compensate Ms. Fairchild for the injuries, emotional harm, mental  
21 anguish, embarrassment, humiliation, and degradation caused by Defendants Hilda Lucia  
22 Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber  
23 Davis-Tinkham, Francisco Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide  
24 Legal LLC, Rapid Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles  
25 & DOES 1-10.  
26  
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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 IED & AGAINST PRIVATE PARTY DEFENDANTS.

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  
28

1 future discriminatory behavior.

2  
3 8. Pursuant to California Civil Code § 52, award Plaintiff Alison Helen Fairchild the  
4 following compensatory, declaratory, and injunctive relief:

- 5  
6 a. A declaratory judgment that at the commencement of this original civil rights action  
7 Defendants InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores,  
8 Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 violated the specific  
9 requirements of the Unruh Civil Rights Act.  
10  
11 b. Irrespective of the Defendants' voluntary cessation of the ADA and Fair Housing  
12 violations, if applicable, a permanent injunction pursuant to the Unruh Civil Rights Act,  
13 which directs and orders Defendants InfoTrack US, Inc., Nationwide Legal LLC, Rapid  
14 Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 to  
15 take all steps necessary to stop discriminating against Fairchild, including but not limited  
16 to Defendants' under color of law illegal acts and actions of allowing their employees  
17 to recklessly block the entrance and exit of a Stanley Mosk Superior Court ADA  
18 handicap ramp.  
19  
20 c. Irrespective of the Defendants' voluntary cessation of the ADA and violations, if  
21 applicable, the payment of costs of this civil rights lawsuit.  
22  
23 d. Irrespective of the Defendants' voluntary cessation of the ADA violations, if applicable,  
24 the payment of attorney's fees.  
25  
26 e. For damages in an amount of no less than \$ 4,000.  
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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 f. The provision of whatever other relief this United States District Court deems just,  
2 equitable, and appropriate pursuant to Defendants' reckless, cruel, willful, wanton,  
3 malicious, careless, knowing, deliberate, and callous violations of the California Unruh  
4 Civil Rights Act.
- 5
- 6 9. Award Plaintiff Alison Helen Fairchild damages (non-economic), special damages  
7 (economic), actual and compensatory damages in an amount to be determined at trial to  
8 compensate her for the California tort of general negligence as alleged against  
9 Defendants InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores,  
10 Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10
- 11
- 12 10. Award Plaintiff Alison Helen Fairchild damages (non-economic), special damages  
13 (economic), actual and compensatory damages in an amount to be determined at trial to  
14 compensate her for the California tort of negligent intentional infliction of emotional  
15 distress as alleged against Defendants InfoTrack US, Inc., Nationwide Legal LLC, Rapid  
16 Legal Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10
- 17
- 18 11. Award Plaintiff Alison Helen Fairchild general damages (non-economic), special  
19 damages (economic), and actual and compensatory damages against Defendants Hilda  
20 Lucia Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole  
21 Amber Davis-Tinkham, Francisco Garibay, LASD Court Services Senior Deputy Sheriff  
22 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores,  
23 Tatianna Simoes-Silva, County of Los Angeles & DOES 1-1 including damages for,  
24 without limitation, embarrassment, humiliation, anxiety, depression, a complete  
25 disruption of life, physical pain and suffering, emotional pain, and suffering, multiple  
26 sclerosis relapses, multiple sclerosis hugs, insomnia, chest pain, inconvenience, heart
- 27
- 28

1  
2 palpitations, frustration, mental anguish, emotional distress, loss of enjoyment of life, loss  
3 of civil rights, deprivation of constitutional rights, and other pain and suffering on all  
4 claims allowed by the law in the amount of **\$ 13,000,000**, or a much more significant  
5 amount as may be set by a jury.

- 6  
7 12. Award Plaintiff Alison Helen Fairchild punitive damages in the amount of **\$**  
8 **33,000,000** to impress upon Defendants Hilda Lucia Solis, Deni K. Butler, Robert G.  
9 Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber Davis-Tinkham, Francisco  
10 Garibay, Gerardo Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal  
11 Inc., Jose Flores, Tatianna Simoes-Silva, County of Los Angeles & DOES 1-10 for the  
12 seriousness of their egregious conduct and to deter similar behavior in the future.
- 13  
14 13. Award Alison Helen Fairchild interest from August 1, 2025.
- 15  
16 14. Award Alison Helen Fairchild reasonable attorney's fees pursuant to 42 U.S.C. § 1988.
- 17  
18 15. Award Plaintiff Alison Helen Fairchild medical, incidental, and hospital expenses  
19 according to proof.
- 20  
21 16. Award Plaintiff Alison Helen Fairchild consequential damages in a sum reasonable to  
22 proof.
- 23  
24 17. Award Plaintiff Alison Helen Fairchild injunctive relief against Defendants Hilda Lucia  
25 Solis, Deni K. Butler, Robert G. Luna, Shawn Kehoe, Holly J. Mitchell, Nicole Amber  
26 Davis-Tinkham, Francisco Garibay, LASD Court Services Senior Deputy Sheriff  
27 Valdivia, InfoTrack US, Inc., Nationwide Legal LLC, Rapid Legal Inc., Jose Flores,  
28

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.

6  
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.

11  
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**

2  
3 Plaintiff Alison Helen Fairchild hereby demands a trial by jury for issues triable by a  
4 United States District Court jury.

5  
6  
7 Respectfully Submitted,

8  
9  
10  
11 **DATE: December 22, 2025**

12  
13 

14  
15  
16 BY: \_\_\_\_\_

17 **Neil E. Opdahl**  
18 [attorney@neilopdahl.com](mailto: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  
25  
26  
27  
28 *Attorney for Plaintiff*

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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.

**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 IIED 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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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 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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12  
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**

18  
19   
20

21  
22 **ALISON HELEN FAIRCHILD**  
23 **1308 East Colorado Blvd.**  
24 **Pasadena, CA 91106**  
25 **Mobile: (626) 755-6442**  
26 Email: [fairchildadacrusader@gmail.com](mailto:fairchildadacrusader@gmail.com)  
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.

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)

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

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:

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)

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

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

SHAWN R. KEHOE
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**

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\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

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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:

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)

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

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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)

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

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

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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:

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)

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

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**

*(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:

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)

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)* \_\_\_\_\_  
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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)* \_\_\_\_\_  
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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)

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

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

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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:

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)

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

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)

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

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\_\_\_\_\_ 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,  
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\_\_\_\_\_ 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:

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](mailto: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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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, 9<sup>th</sup> Floor

USMJ: Honorable A. Joel Richlin  
Court: 255 E. Temple Street  
Los Angeles, CA 90012  
Courtroom 780, 7<sup>th</sup> 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  
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Phone: 626.429.6578

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.

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



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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](mailto: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)**  
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**Phone:** 626.429.6578

1  
2 **DECLARATION OF AROGANT HOLLYWOOD**

3  
4 **I, AROGANT HOLLYWOOD, DECLARE AS FOLLOWS:**

5  
6 1. I am over the age of 18 years old and not a party to the above-captioned civil rights  
7 lawsuit.

8  
9 2. If I were called as a witness, I could and would testify to those facts as the truth, the  
10 whole truth, and nothing but the truth.

11  
12 3. Since at least 2011, I have been both an atheist and agnostic, and thus, I am unable to  
13 swear herein under any “*god*” pretense.

14  
15 4. Attached hereto as **Exhibit 1** is a true and correct digital copy of a photograph screenshot  
16 created on my desktop computer that was taken from a still video recording image created  
17 initially by my GoPro Hero 13 Black Action Camera, video recording **GX010703**. This  
18 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
19 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
20 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
21 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
22 December 20, 2025, 8:38:35 AM, Size: 1.31 MB (1,370,919 bytes), Path of Internal storage:  
23 Created On Saturday, December 20, 2025, 8:38:35 AM, Modified On Saturday, December 20,  
24 2025, 8:38:35 AM, Accessed: Today, December 26, 2025, 2:20:44 PM. This photograph shows  
25

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

27  
28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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San Bernardino, CA 92408  
**Email:** [attorney@neilopdahl.com](mailto:attorney@neilopdahl.com)  
**Phone:** 626.429.6578

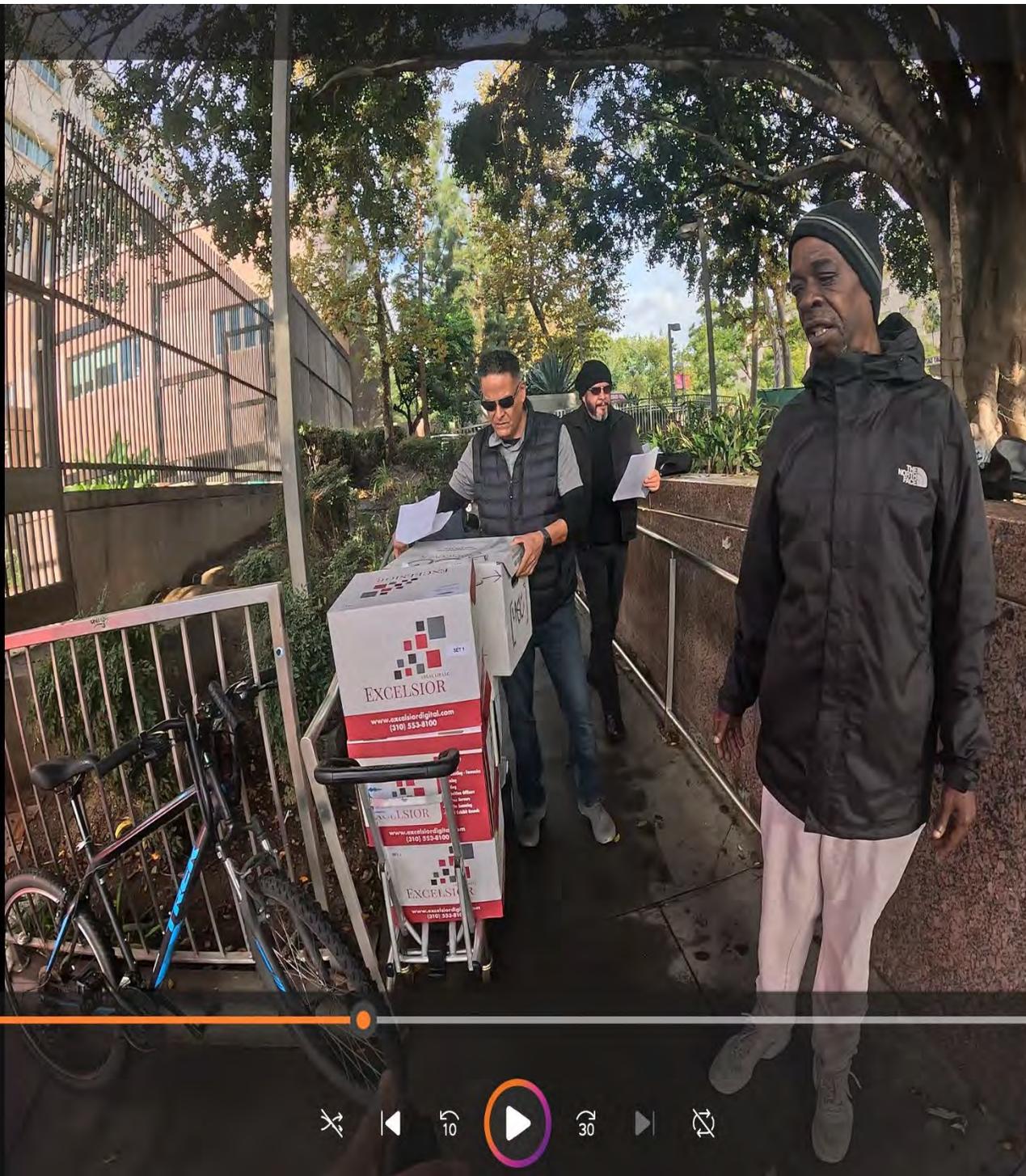
1 a still image of the original GoPro video recording, which was titled **GX010703** at the time of  
2 creation and filming. In the image, the video recording **GX010703** is paused at 0:02:26 (two  
3 minutes and twenty-six seconds) and depicts numerous individuals and their legal boxes  
4 blocking 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.

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

27  
28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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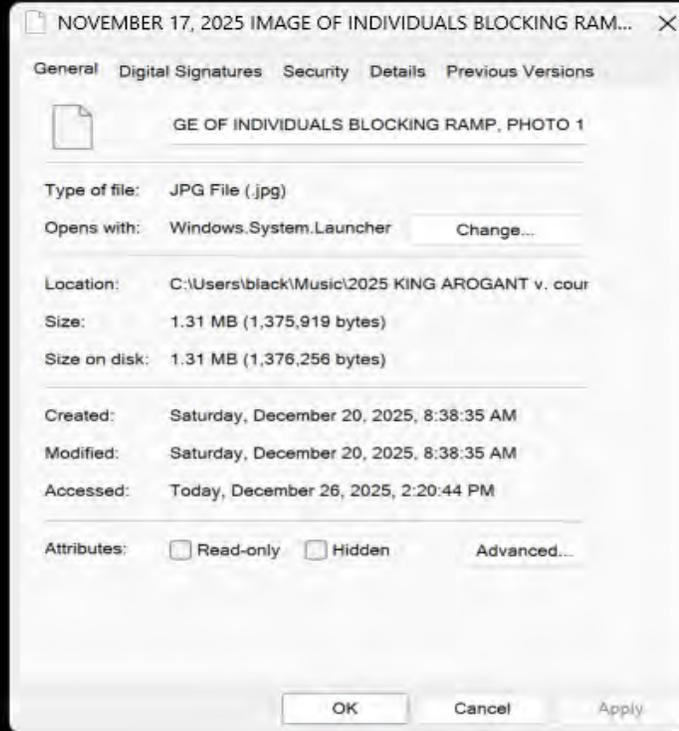
a Player



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## DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

Neil E. Opdahl-Lopez, Esq (SBN # 277596)  
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## DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

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Phone: 626.429.6578

1 5. Attached hereto as **Exhibit 2** is a true and correct digital copy of a photograph screenshot  
2 created on my desktop computer that was taken from a still video recording image created  
3 initially by my GoPro Hero 13 Black Action Camera, video recording **GX010703**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 20, 2025, 8:46:13 AM, Size: 1.34 MB (1,413,019 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 8:46:13 AM, Modified On Saturday, December 20,  
10 2025, 8:46:14 AM, Accessed: Today, December 26, 2025, 3:29 PM. This photograph shows a  
11 still image of the original GoPro video recording, which was titled **GX010703** at the time of  
12 creation and filming. In the image, the video recording **GX010703** is paused at 0:01:45 (one  
13 minute and forty-five seconds) and depicts numerous individuals and their legal boxes blocking  
14 the entrance of the Stanley Mosk Superior Court outside handicap ramp located at 111 North  
15 Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010703** is paused at  
16 0:01:45 (one minute and forty-five seconds) and depicts numerous individuals and boxes  
17 blocking the guardrails and handrails of the Stanley Mosk Superior Court outside handicap ramp  
18 located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro video recording  
19 was created on November 17, 2025, at 7:21 AM. Please see attached.

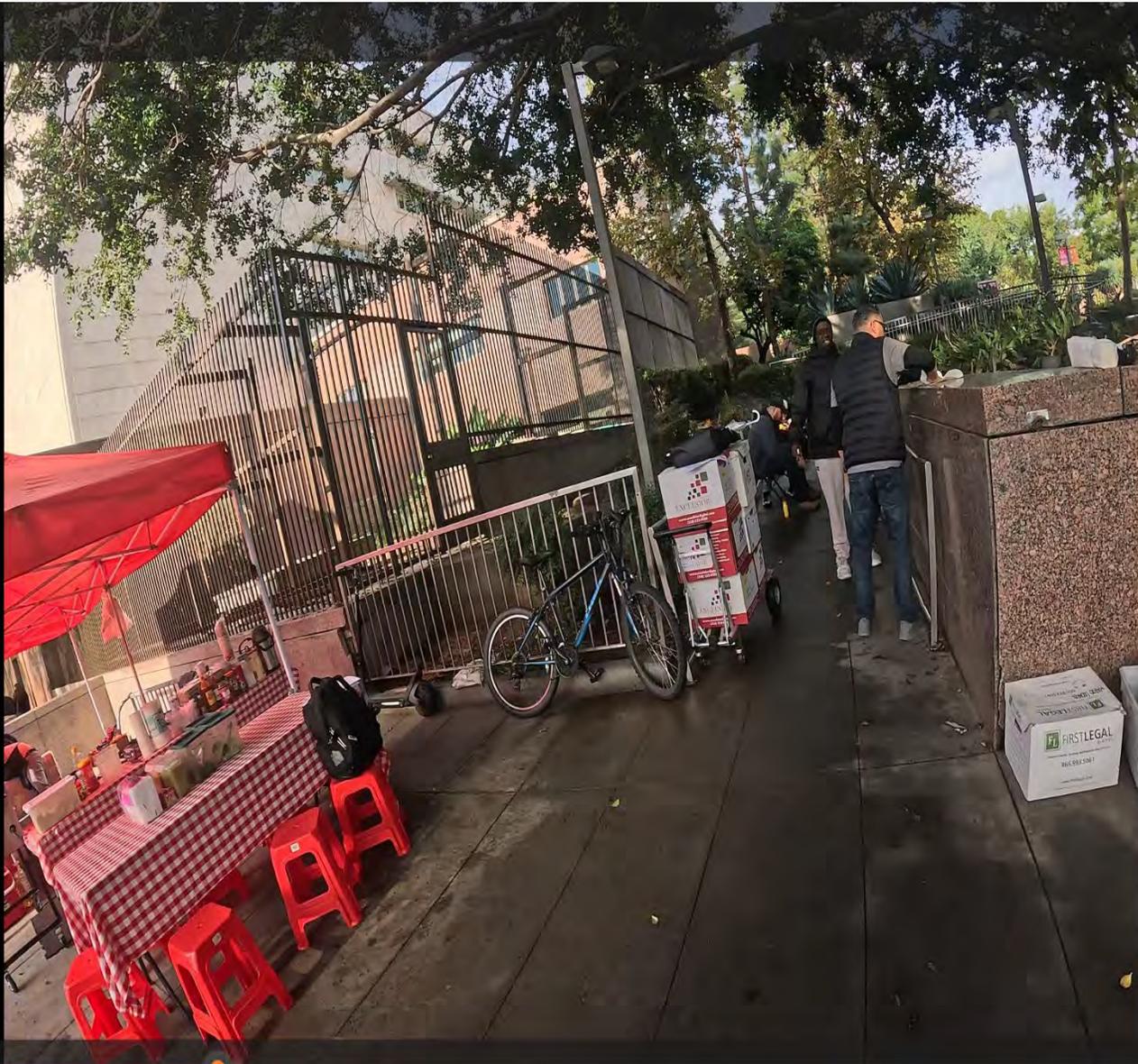
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26 **DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

27  
28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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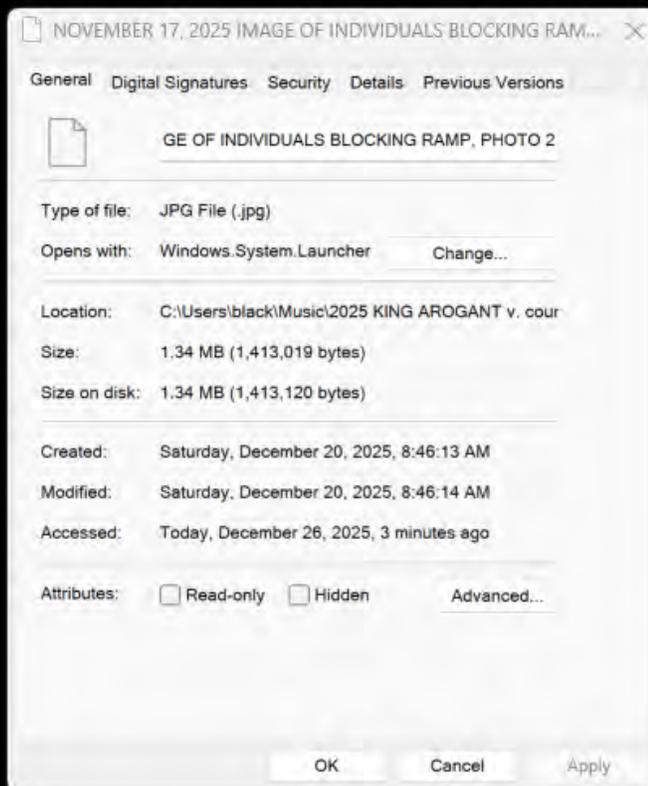
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## DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

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Phone: 626.429.6578

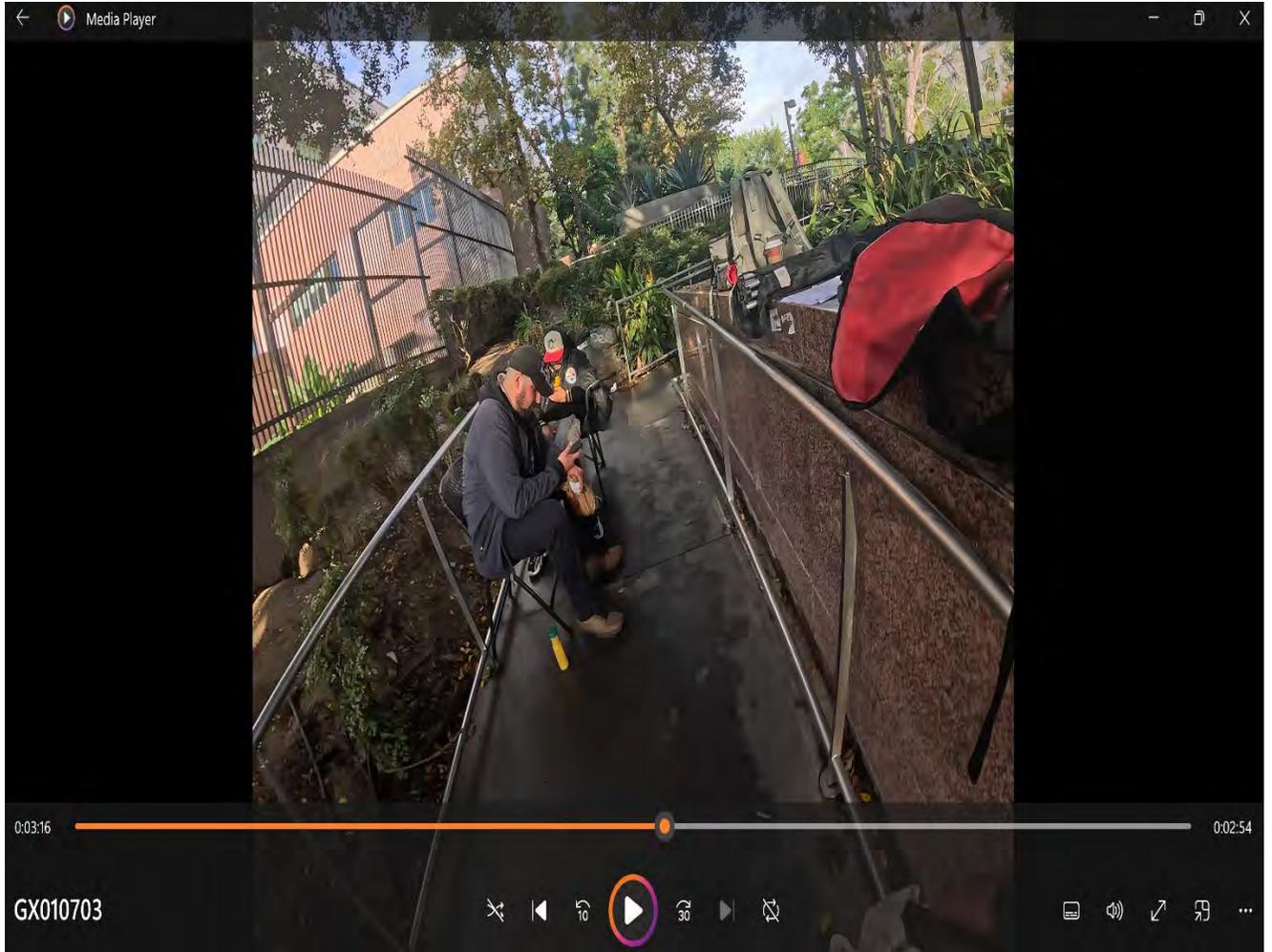
1 6. Attached hereto as **Exhibit 3** is a true and correct digital copy of a photograph screenshot  
2 created on my desktop computer that was taken from a still video recording image created  
3 initially by my GoPro Hero 13 Black Action Camera, video recording **GX010703**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 20, 2025, 8:51:13 AM, Size: 1.16 MB (1,219,938 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 8:51:13 AM, Modified On Saturday, December 20,  
10 2025, 8:51:13 AM, Accessed: Today, December 26, 2025, 4:15 PM. This photograph shows a  
11 still image of the original GoPro video recording, which was titled **GX010703** at the time of  
12 creation and filming. In the image, the video recording **GX010703** is paused at 0:03:16 (three  
13 minutes and sixteen seconds) and depicts numerous individuals and their chairs blocking the  
14 path midway through the actual Stanley Mosk Superior Court outside handicap ramp located at  
15 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010703** is  
16 paused at 0:03:16 (three minutes and sixteen seconds) and depicts numerous individuals and  
17 boxes blocking the guardrails and handrails of the Stanley Mosk Superior Court outside  
18 handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro  
19 video recording was created on November 17, 2025, at 7:21 AM. Please see attached.  
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26 **DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

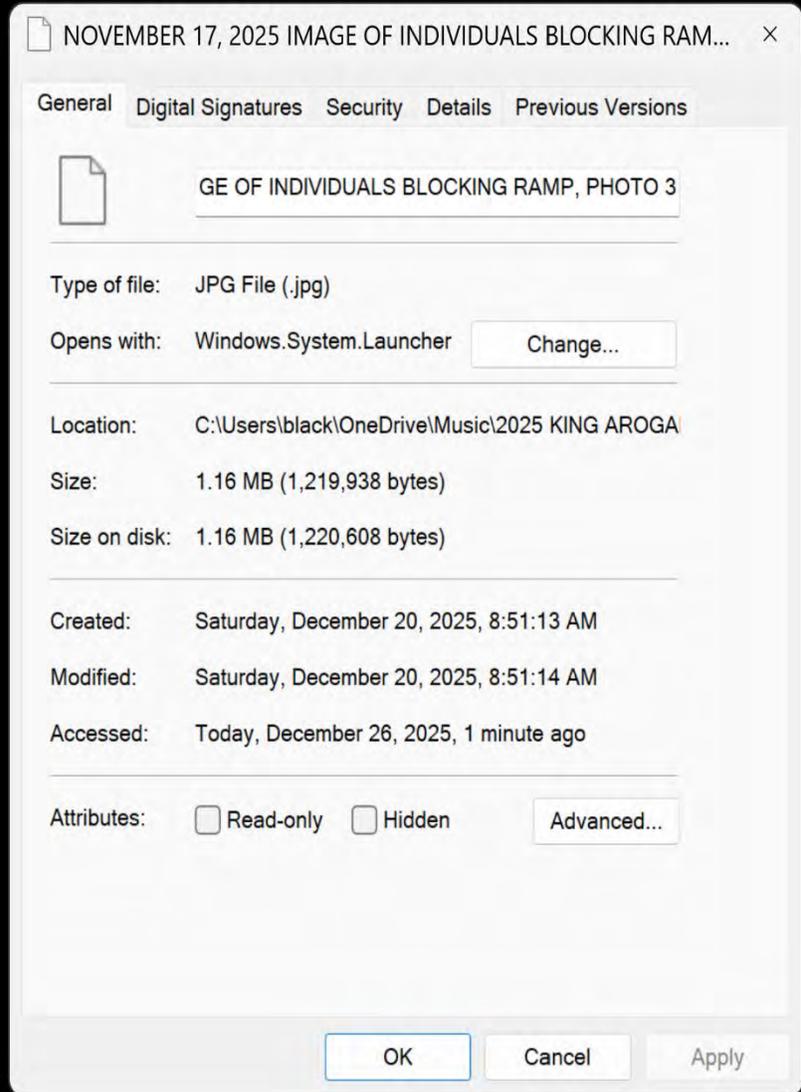
27  
28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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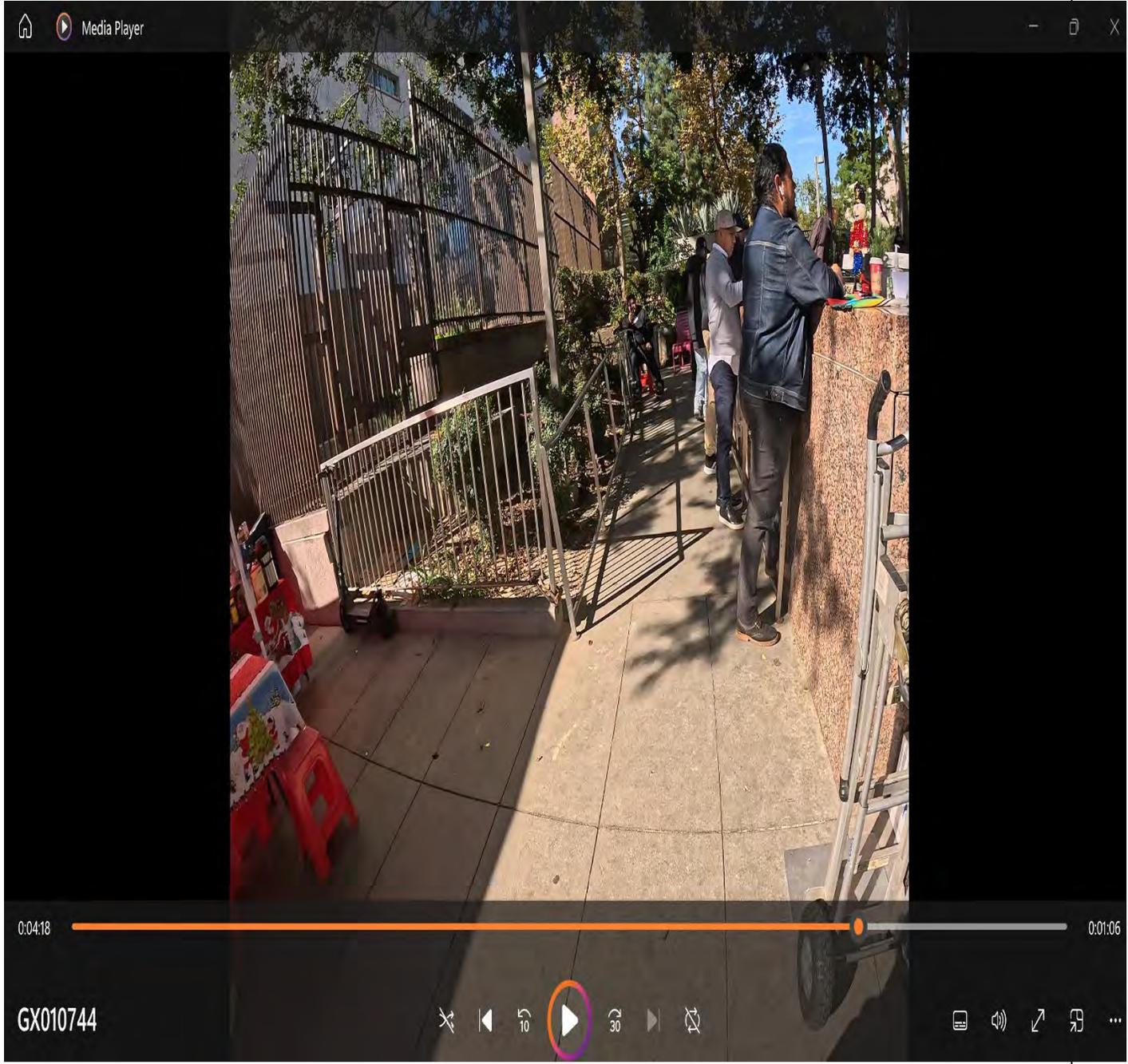
1 7. Attached hereto as **Exhibit 4** is a true and correct digital copy of a photograph screenshot  
2 created on my desktop computer that was taken from a still video recording image created  
3 initially by my GoPro Hero 13 Black Action Camera, video recording **GX010744**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 20, 2025, 10:22:52 AM, Size: 1.45 MB (1,531,340 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 10:22:52 AM, Modified On Saturday, December 20,  
10 2025, 10:22:53 AM, Accessed: Today, December 27, 2025, 3:06 AM. This photograph shows a  
11 still image of the original GoPro video recording, which was titled **GX010744** at the time of  
12 creation and filming. In the image, the video recording **GX010744** is paused at 0:04:18 (four  
13 minutes and eighteen seconds) and depicts numerous individuals blocking the entrance and the  
14 path midway through the actual Stanley Mosk Superior Court outside handicap ramp located at  
15 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010744** is  
16 paused at 0:04:18 (four minutes and eighteen seconds) and depicts numerous individuals and  
17 their chairs blocking the guardrails and handrails of the Stanley Mosk Superior Court outside  
18 handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro  
19 video recording was created on December 2, 2025, 2025, at 10:51 AM. Please see attached.  
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**DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

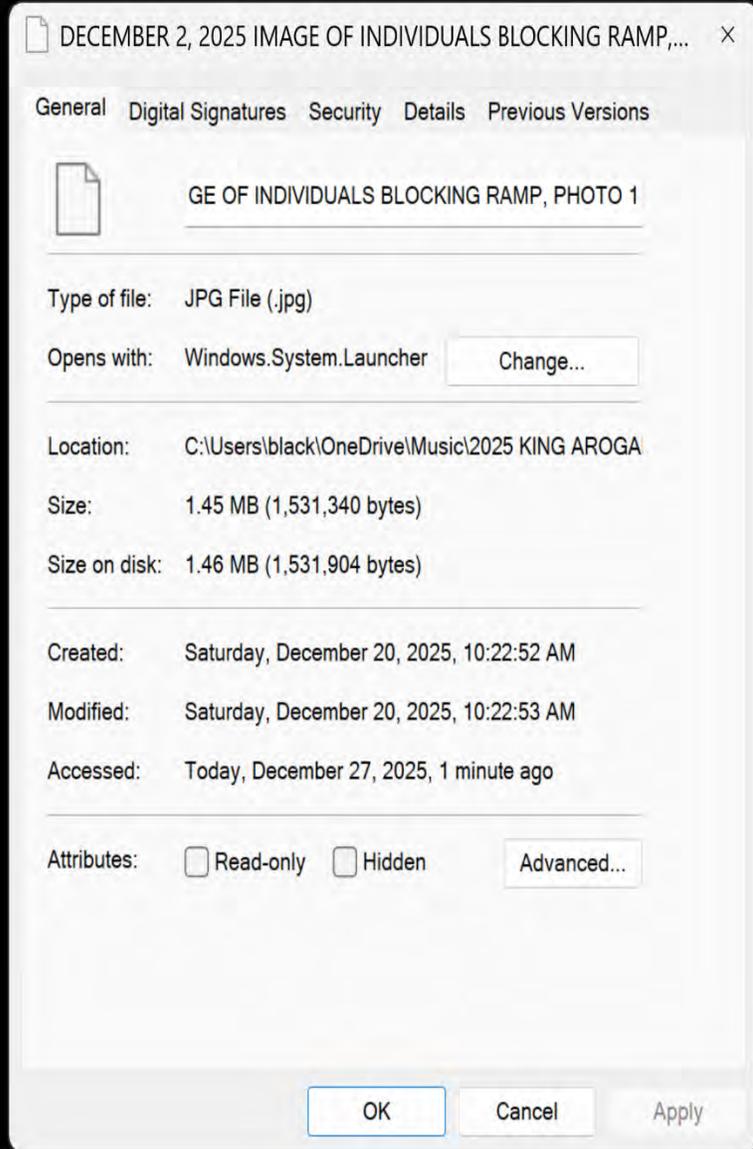
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**Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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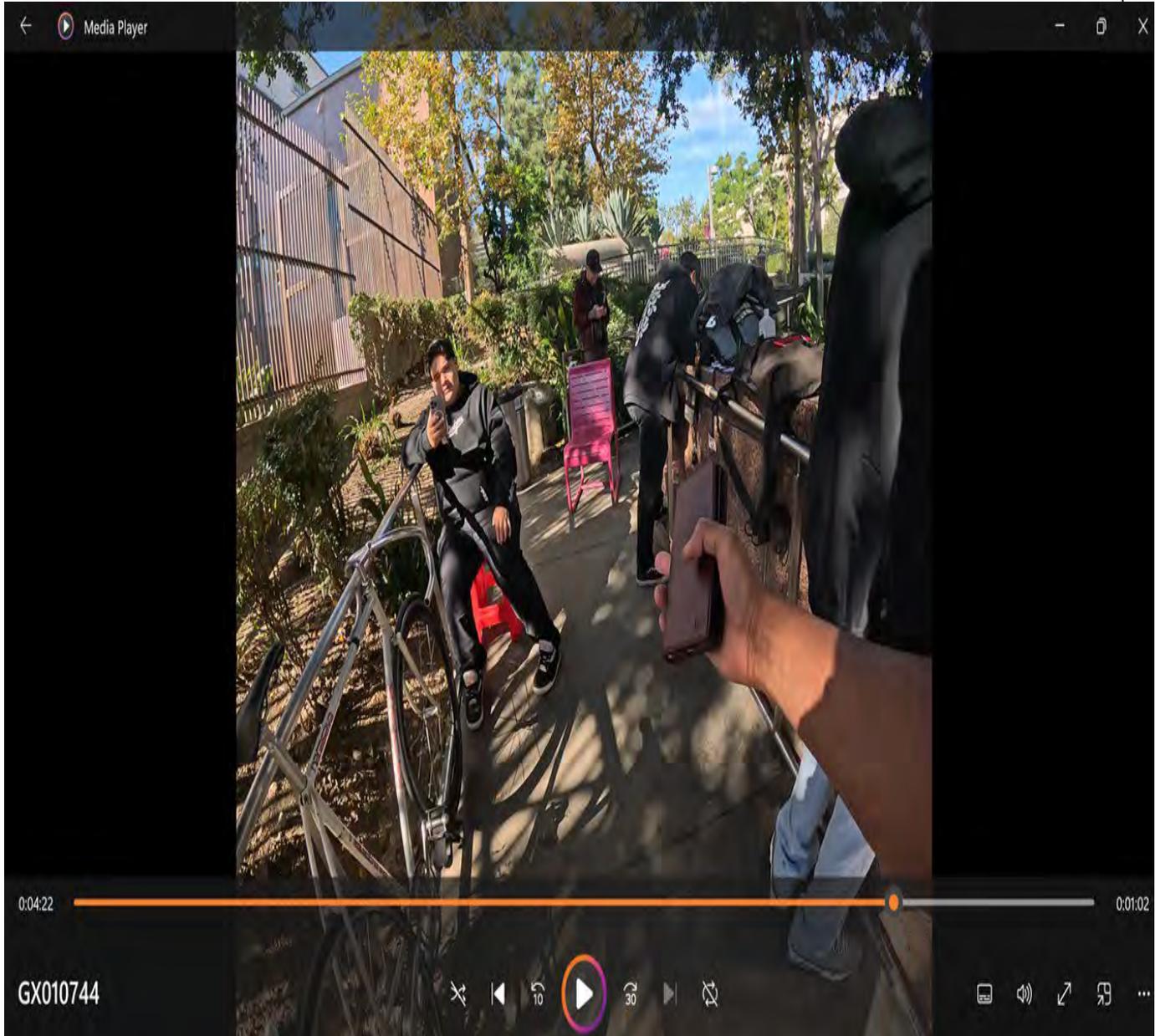
1 8. Attached hereto as **Exhibit 5** is a true and correct digital copy of a photograph screenshot  
2 created on my desktop computer that was taken from a still video recording image created  
3 initially by my GoPro Hero 13 Black Action Camera, video recording **GX010744**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 20, 2025, 10:27:49 AM, Size: 224 KB (229,964 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 10:27:49 AM, Modified On Saturday, December 20,  
10 2025, 10:27:49 AM, Accessed: Today, December 27, 2025, 2:33 PM. This photograph shows a  
11 still image of the original GoPro video recording, which was titled **GX010744** at the time of  
12 creation and filming. In the image, the video recording **GX010744** is paused at 0:04:22 (four  
13 minutes and twenty-two seconds) and depicts numerous individuals blocking the entrance and  
14 the path midway through the actual Stanley Mosk Superior Court outside handicap ramp located  
15 at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010744**  
16 is paused at 0:04:22 (four minutes and twenty-two seconds) and depicts numerous individuals  
17 and their chairs blocking the guardrails, handrails, and pathway of the Stanley Mosk Superior  
18 Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The  
19 original GoPro video recording was created on December 2, 2025, 2025, at 10:51 AM. Please  
20 see attached.

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

27  
28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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**Phone:** 626.429.6578

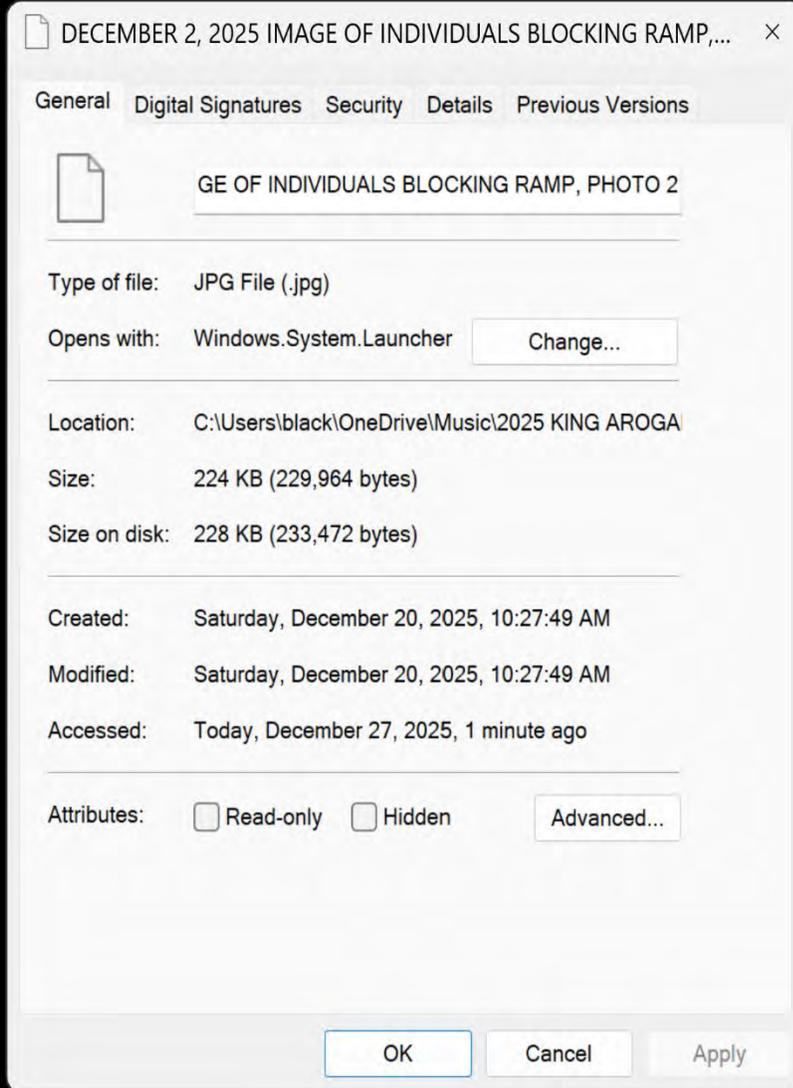
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## DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

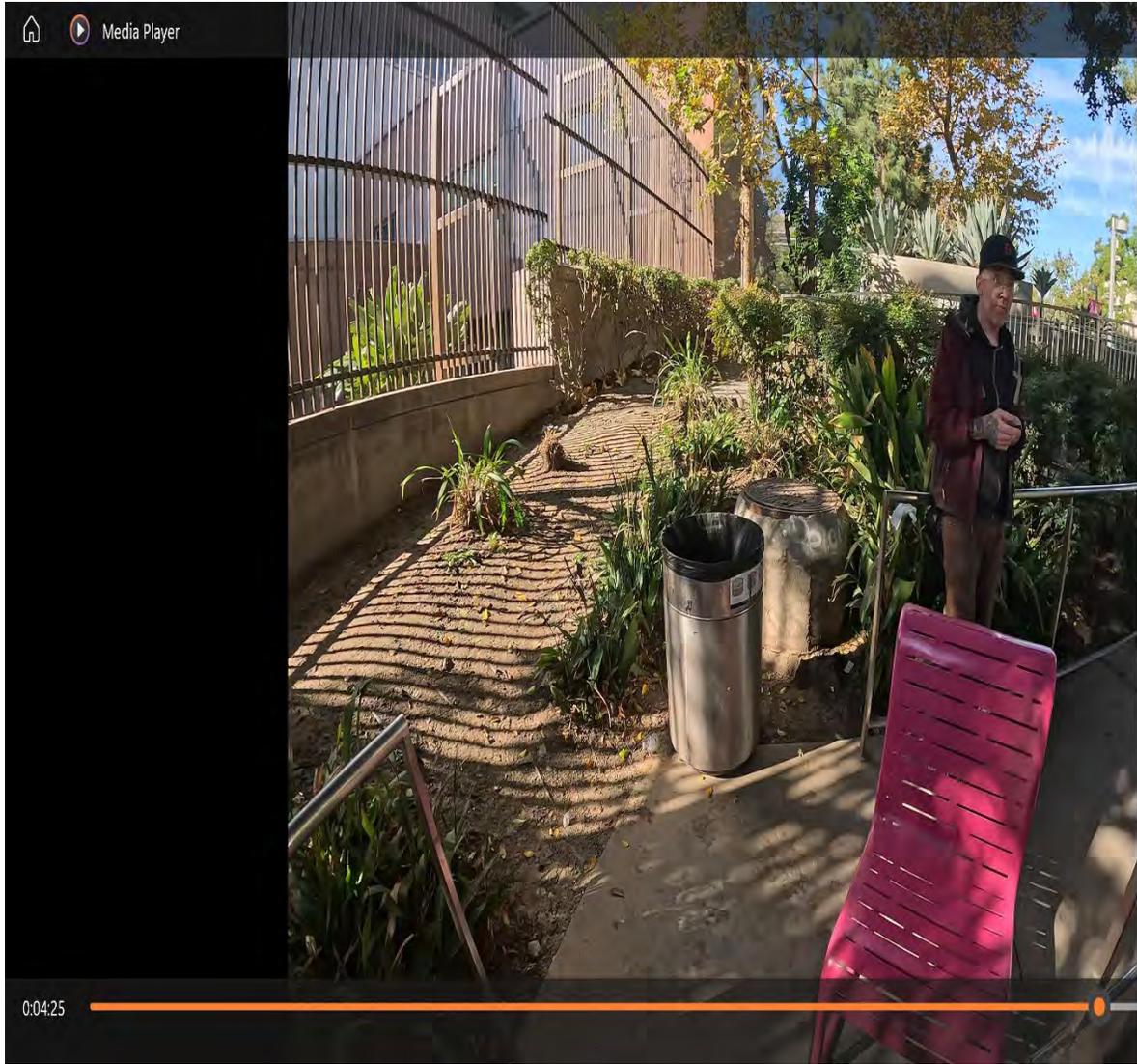
Neil E. Opdahl-Lopez, Esq (SBN # 277596)  
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 San Bernardino, CA 92408  
 Email: [attorney@neilopdahl.com](mailto:attorney@neilopdahl.com)  
 Phone: 626.429.6578

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

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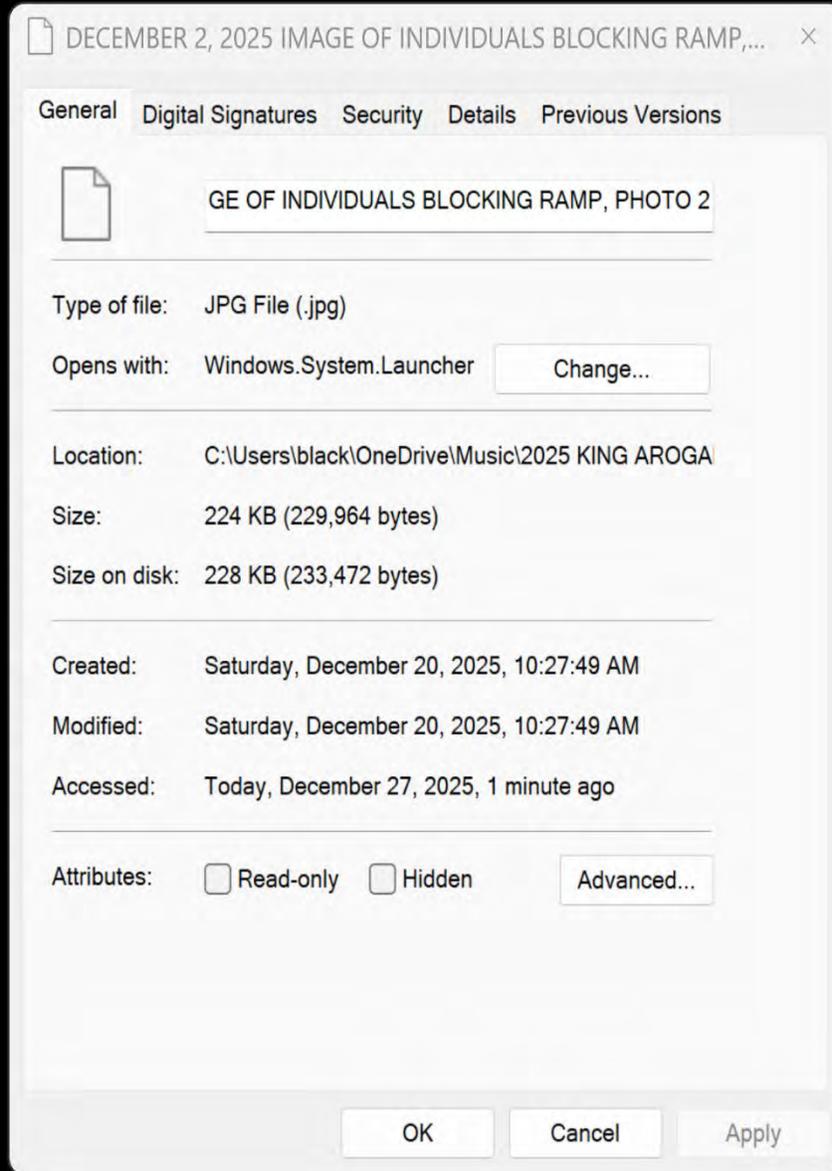
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26 **DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

27  
28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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1 10. Attached hereto as **Exhibit 7** is a true and correct digital copy of a photograph screenshot  
2 created on my desktop computer that was taken from a still video recording image created  
3 initially by my GoPro Hero 13 Black Action Camera, video recording **GX010744**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 20, 2025, 10:35:23 AM, Size: 1.40 MB (1,473,946 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 10:36:23 AM, Modified On Saturday, December 20,  
10 2025, 10:35:23 AM, Accessed: Today, December 27, 2025, 5:05 PM (2 minutes ago). This  
11 photograph shows a still image of the original GoPro video recording, which was titled  
12 **GX010744** at the time of creation and filming. In the image, the video recording **GX010744** is  
13 paused at 0:04:29 (four minutes and twenty-nine seconds) and depicts numerous individuals  
14 leaning on the guardrails and handrails of the actual Stanley Mosk Superior Court outside  
15 handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video  
16 recording **GX010744** is paused at 0:04:29 (four minutes and twenty-nine seconds) and depicts a  
17 large pink chair blocking the pathway of the Stanley Mosk Superior Court outside handicap  
18 ramp located at 111 North Hill Street, Los Angeles, CA 90012. The original GoPro video  
19 recording was created on December 2, 2025, 2025, at 10:51 AM. Please see attached.

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

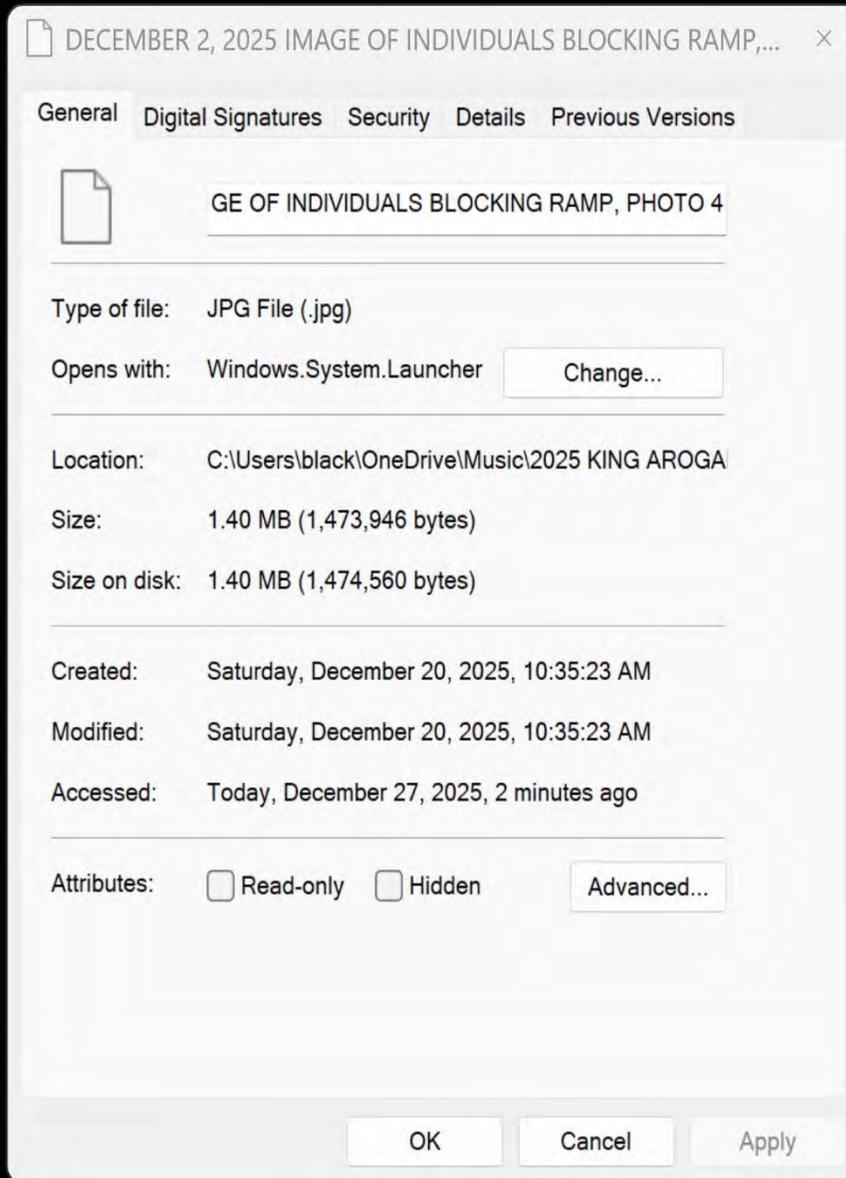
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28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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**DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

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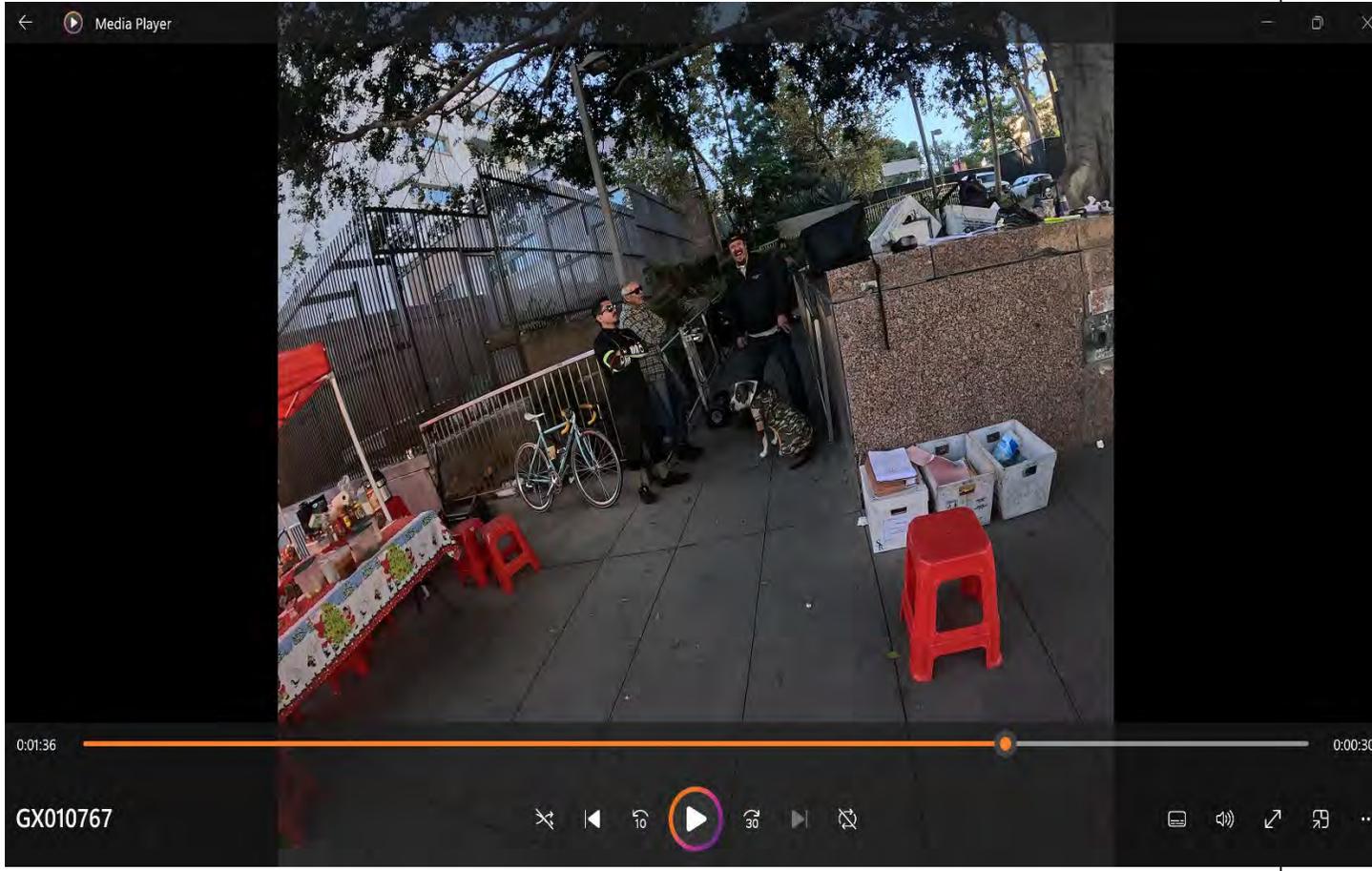
1 11. Attached hereto as **Exhibit 8** is a true and correct digital copy of a photograph screenshot  
2 created on my desktop computer that was taken from a still video recording image created  
3 initially by my GoPro Hero 13 Black Action Camera, video recording **GX010767**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 20, 2025, 11:39 AM, Size: 1.21 MB (1,277,364 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 11:39:01 AM, Modified On Saturday, December 20,  
10 2025, 11:39:01 AM, Accessed: Today, December 27, 2025, 5:22 PM (7 minutes ago). This  
11 photograph shows a still image of the original GoPro video recording, which was titled  
12 **GX010767** at the time of creation and filming. In the image, the video recording **GX010767** is  
13 paused at 0:01:36 (one minute and thirty-six seconds) and depicts numerous individuals leaning  
14 on the guardrails and handrails of the actual Stanley Mosk Superior Court outside handicap  
15 ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video  
16 recording **GX010767** is paused at 0:01:36 (one minute and thirty-six seconds) and depicts one  
17 individual and a dog entirely blocking the entrance and pathway of the Stanley Mosk Superior  
18 Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. The  
19 original GoPro video recording was created on December 5, 2025, at 1:55 PM. Please see  
20 attached.

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

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28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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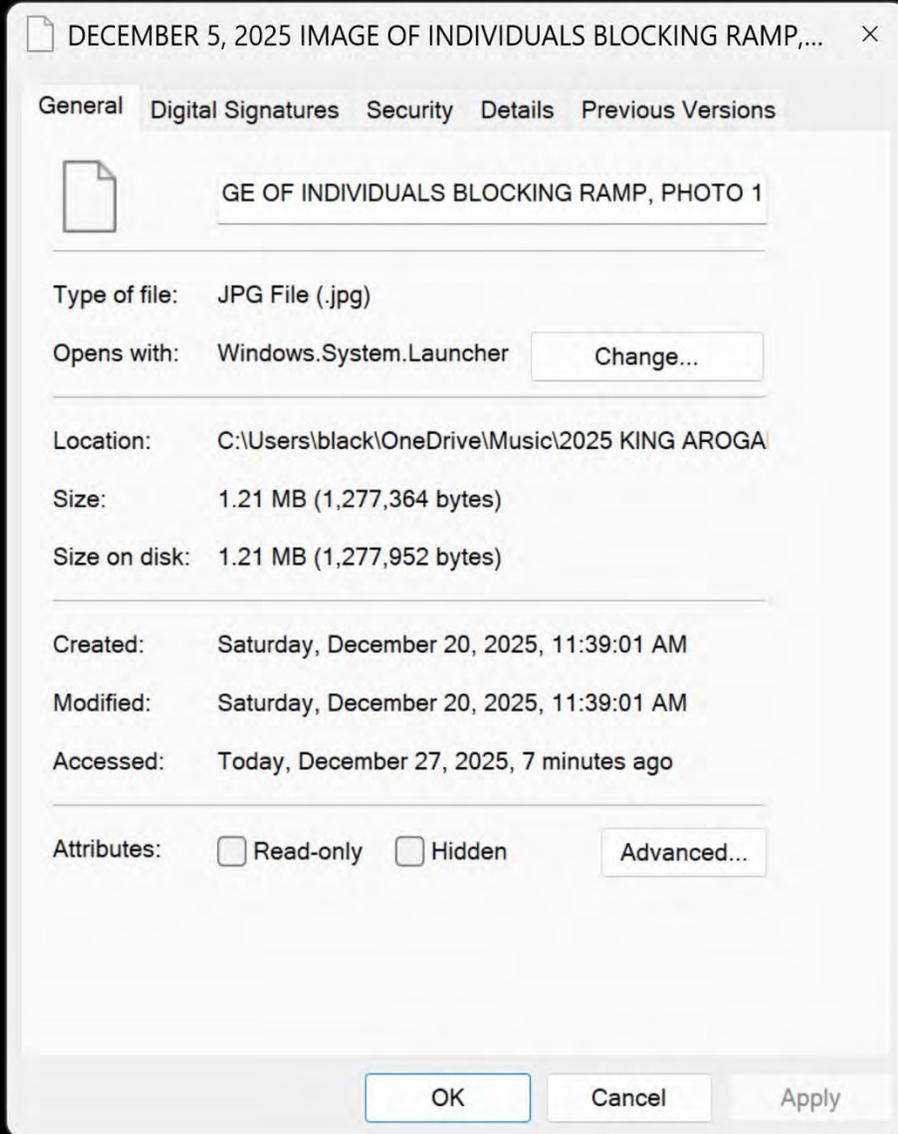
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**DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

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## DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

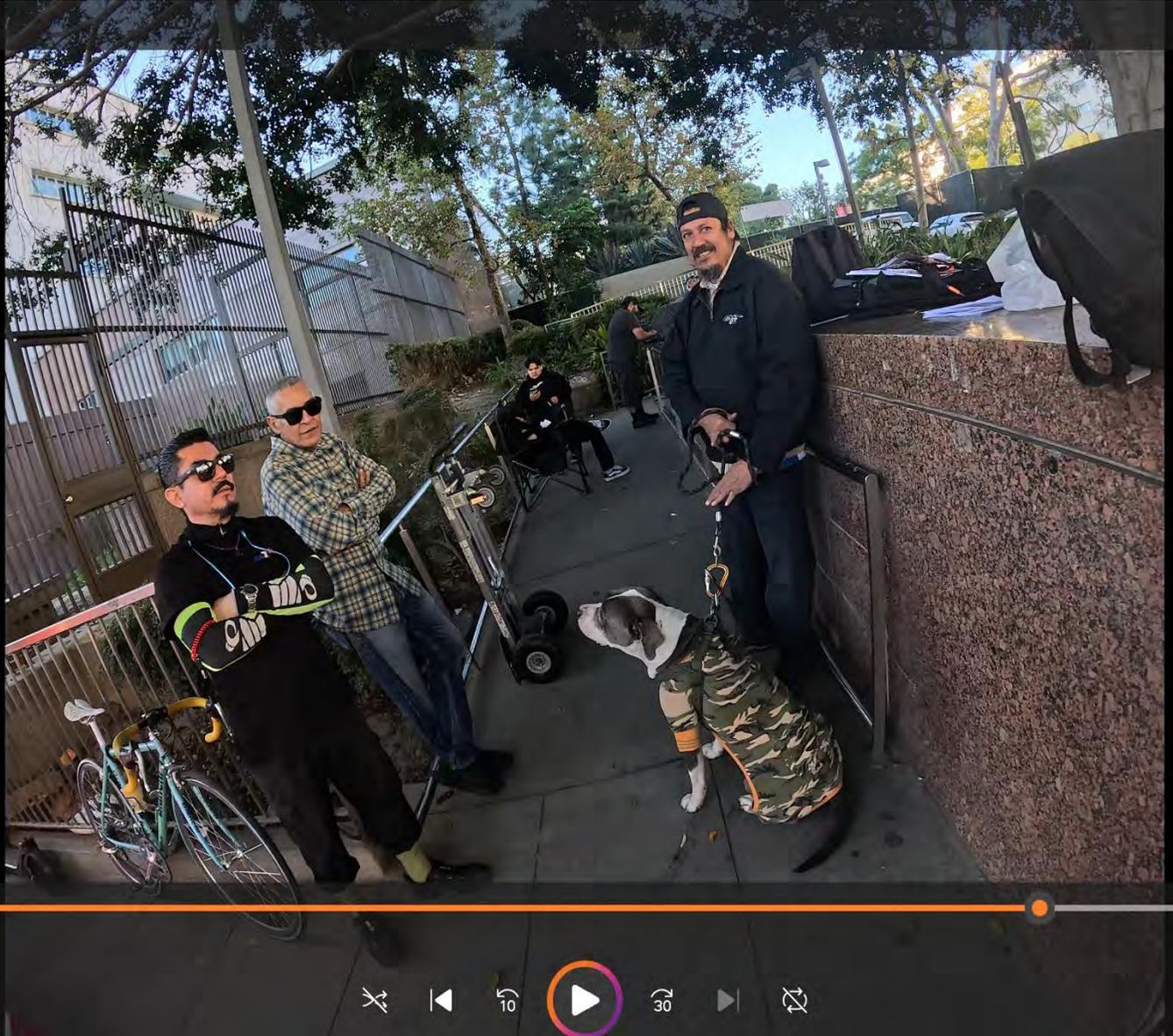
Neil E. Opdahl-Lopez, Esq (SBN # 277596)  
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 473 E. Carnegie Drive, Suite 200  
 San Bernardino, CA 92408  
 Email: [attorney@neilopdahl.com](mailto:attorney@neilopdahl.com)  
 Phone: 626.429.6578

1 12. Attached hereto as **Exhibit 9** is a true and correct digital copy of a photograph screenshot  
2 created on my desktop computer that was taken from a still video recording image created  
3 initially by my GoPro Hero 13 Black Action Camera, video recording **GX010767**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 20, 2025, 11:40:41 AM, Size: 1.29 MB (1,362,076 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 11:40:41 AM, Modified On Saturday, December 20,  
10 2025, 11:40:41 AM, Accessed: Today, December 27, 2025, 5:53 PM (3 minutes ago). This  
11 photograph shows a still image of the original GoPro video recording, which was titled  
12 **GX010767** at the time of creation and filming. In the image, the video recording **GX010767** is  
13 paused at 0:01:38 (one minute and thirty-eight seconds) and depicts numerous individuals  
14 leaning on the guardrails and handrails of the actual Stanley Mosk Superior Court outside  
15 handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012. In the image, the video  
16 recording **GX010767** is paused at 0:01:38 (one minute and thirty-eight seconds) and depicts  
17 numerous individuals, a metal cart, and a dog entirely blocking the entrance and pathway of the  
18 Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los  
19 Angeles, CA 90012. The original GoPro video recording was created on December 5, 2025, at  
20 1:55 PM. Please see attached.

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

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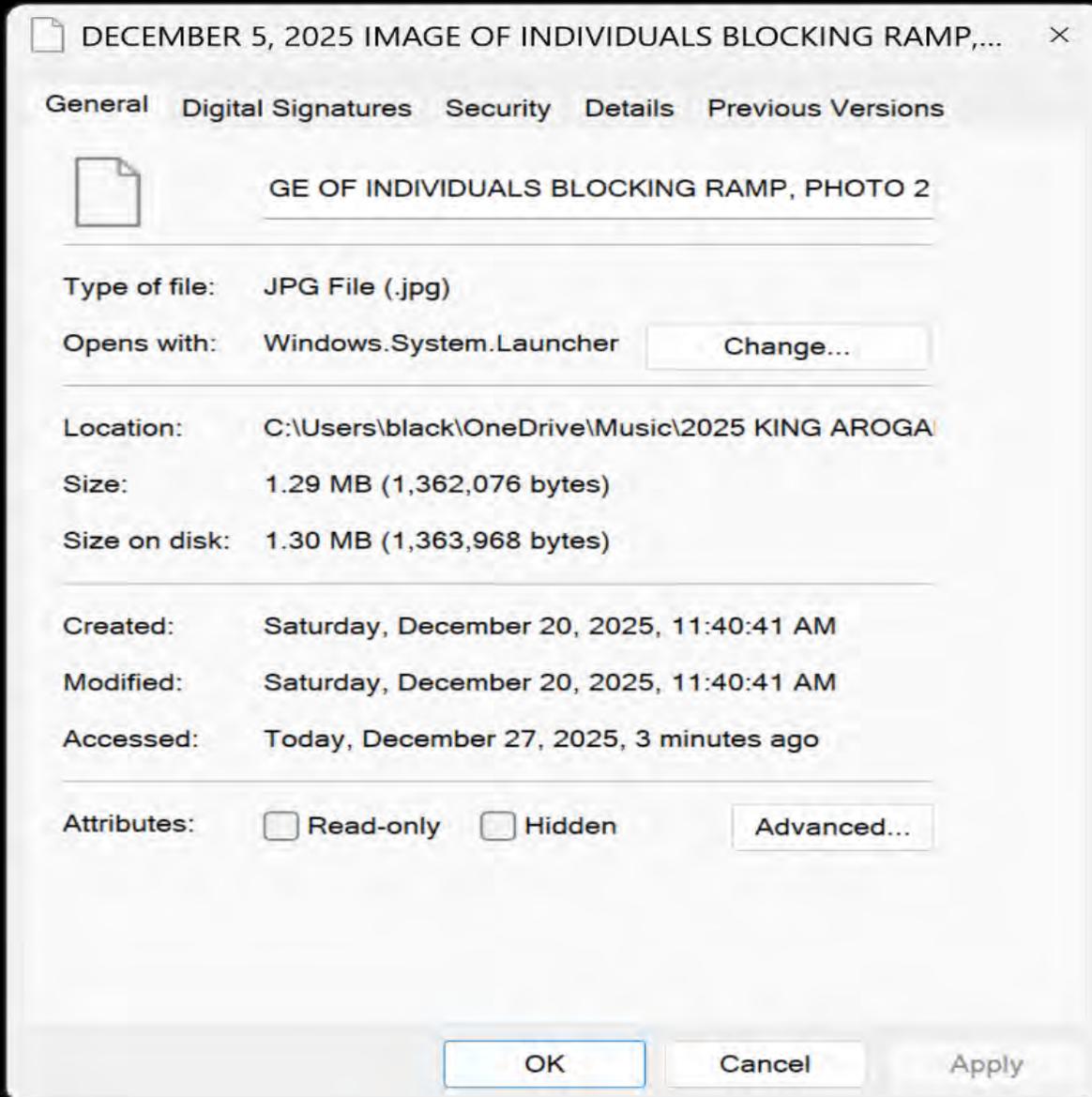


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## DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

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## DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

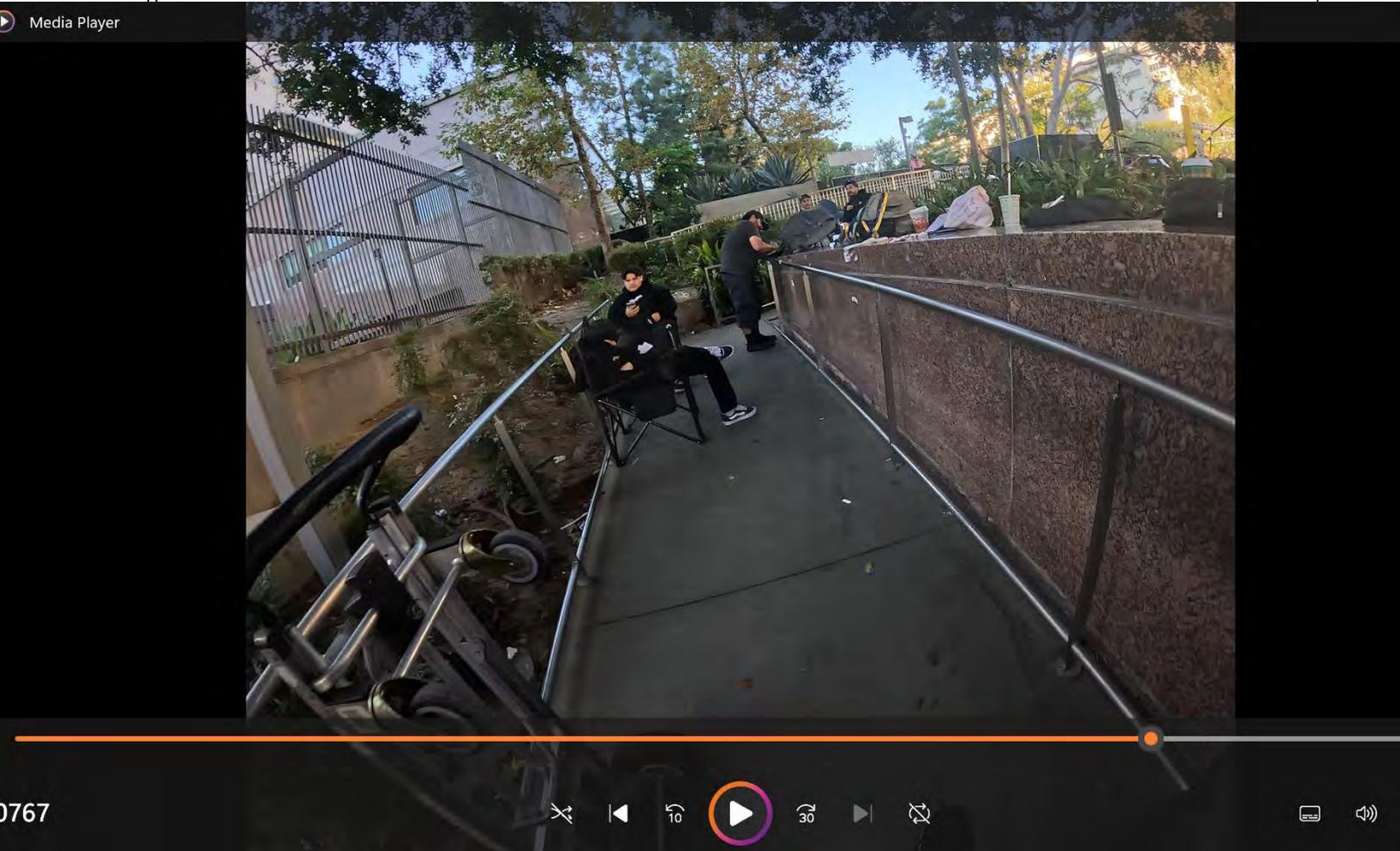
Neil E. Opdahl-Lopez, Esq (SBN # 277596)  
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Phone: 626.429.6578

1 13. Attached hereto as **Exhibit 10** is a true and correct digital copy of a photograph  
2 screenshot created on my desktop computer that was taken from a still video recording image  
3 created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010767**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 20, 2025, 11:43:38 AM, Size: 1.05 MB (1,106,154 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 11:43:38 AM, Modified On Saturday, December 20,  
10 2025, 11:43:39 AM, Accessed: Today, December 27, 2025, 6:24:18 PM. This photograph shows  
11 a still image of the original GoPro video recording, which was titled **GX010767** at the time of  
12 creation and filming. In the image, the video recording **GX010767** is paused at 0:01:40 (one  
13 minute and forty seconds) and depicts numerous individuals leaning on the guardrails and  
14 handrails of the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North  
15 Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010767** is paused at  
16 0:01:38 (one minute and thirty-eight seconds) and depicts numerous individuals, a metal cart,  
17 and a chair blocking the pathway of the Stanley Mosk Superior Court outside handicap ramp  
18 located at 111 North Hill Street, Los Angeles, CA 90012, almost entirely. The original GoPro  
19 video recording was created on December 5, 2025, at 1:55 PM. Please see attached.  
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27 **DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

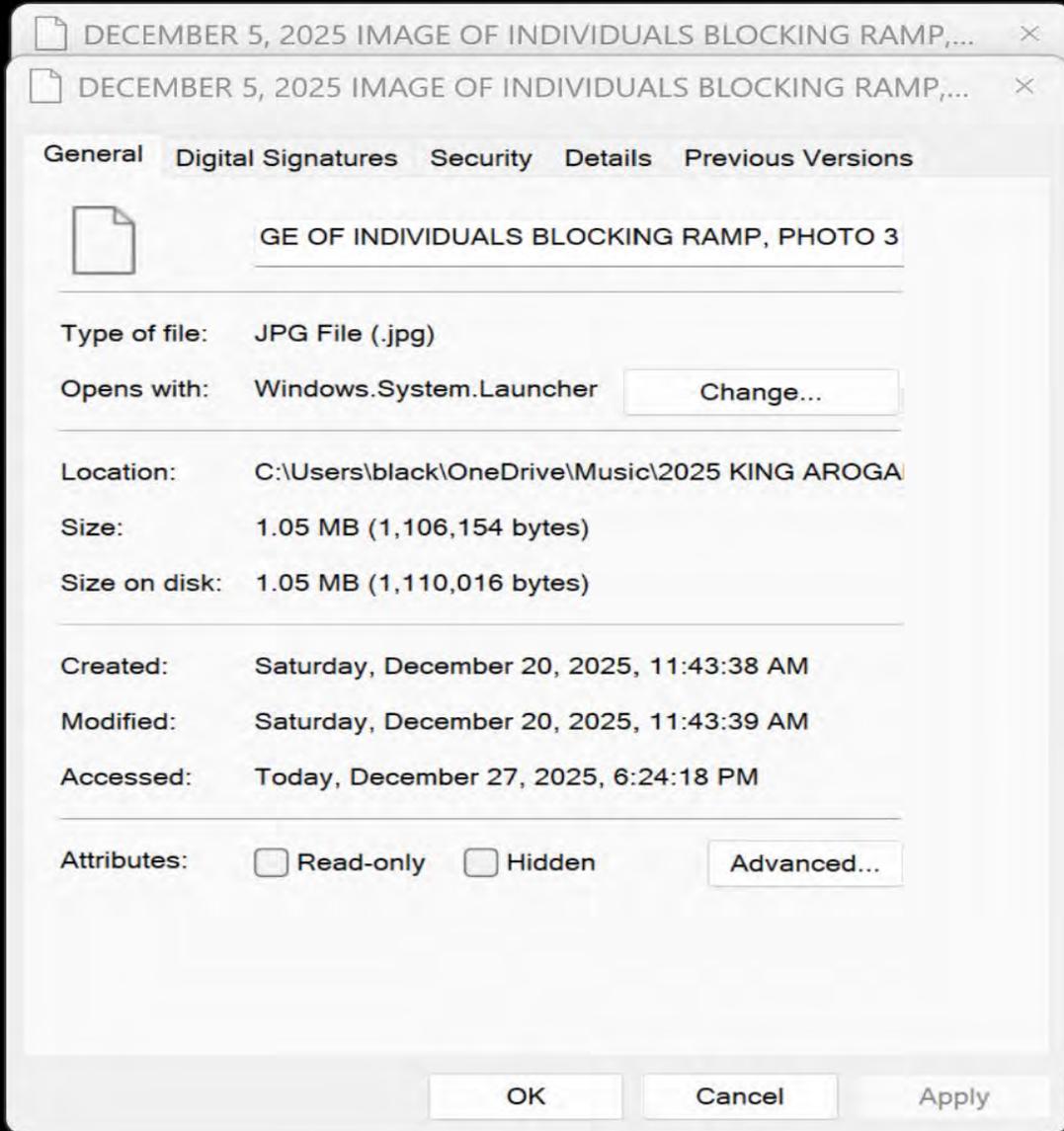
28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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1 14. Attached hereto as **Exhibit 11** is a true and correct digital copy of a photograph  
2 screenshot created on my desktop computer that was taken from a still video recording image  
3 created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010767**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 20, 2025, 11:45:09 AM, Size: 1.03 MB (1,087,868 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 11:45:09 AM, Modified On Saturday, December 20,  
10 2025, 11:45:09 AM, Accessed: Today, December 27, 2025, 7:08:11 PM. This photograph shows  
11 a still image of the original GoPro video recording, which was titled **GX010767** at the time of  
12 creation and filming. In the image, the video recording **GX010767** is paused at 0:01:42 (one  
13 minute and forty-two seconds) and depicts numerous individuals leaning on the guardrails and  
14 handrails of the actual Stanley Mosk Superior Court outside handicap ramp located at 111 North  
15 Hill Street, Los Angeles, CA 90012. In the image, the video recording **GX010767** is paused at  
16 0:01:42 (one minute and forty-two seconds) and depicts numerous individuals and multiple  
17 chairs blocking the pathway of the Stanley Mosk Superior Court outside handicap ramp located  
18 at 111 North Hill Street, Los Angeles, CA 90012, almost entirely. The original GoPro video  
19 recording was created on December 5, 2025, at 1:55 PM. Please see attached.  
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**DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

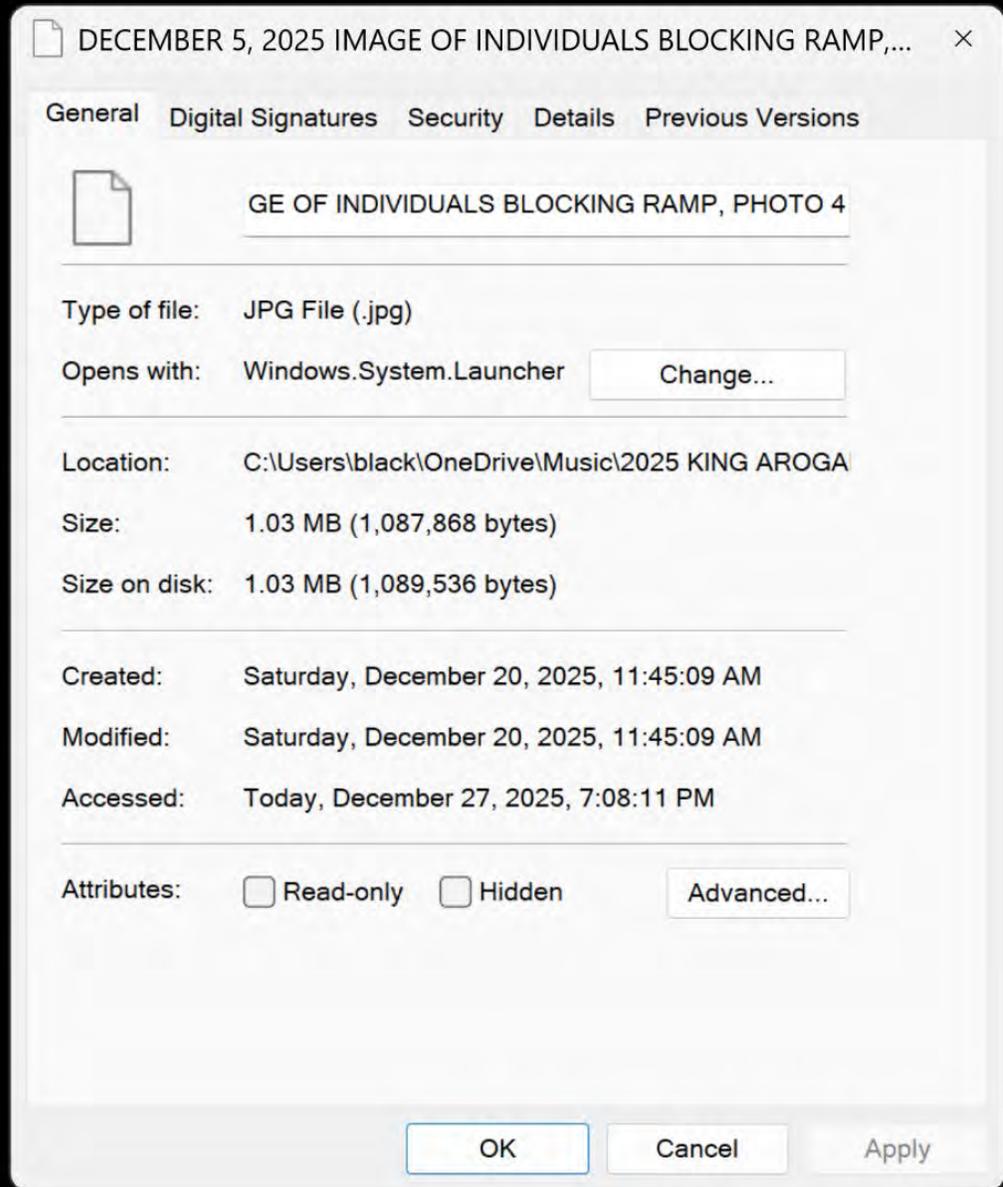
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## DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

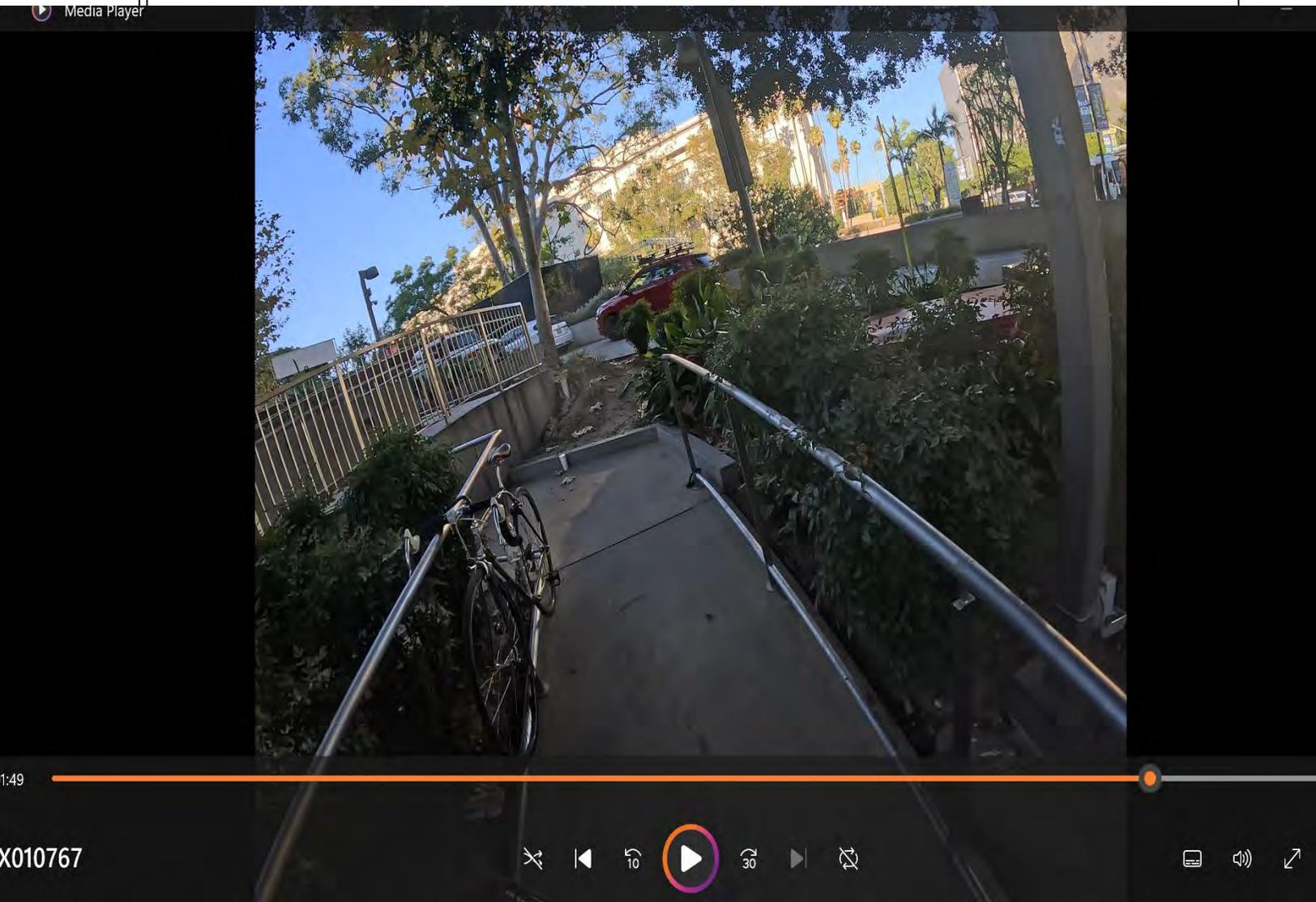
Neil E. Opdahl-Lopez, Esq (SBN # 277596)  
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1 15. Attached hereto as **Exhibit 12** is a true and correct digital copy of a photograph  
2 screenshot created on my desktop computer that was taken from a still video recording image  
3 created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010767**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 20, 2025, 11:47:19 AM, Size: 1.04 MB (1,091,552 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 11:47:20 AM, Modified On Saturday, December 20,  
10 2025, 11:47:20 AM, Accessed: Today, December 27, 2025, 7:20:10 PM. This photograph shows  
11 a still image of the original GoPro video recording, which was titled **GX010767** at the time of  
12 creation and filming. In the image, the video recording **GX010767** is paused at 0:01:49 (one  
13 minute and forty-nine seconds) and depicts a bicycle blocking guardrails and handrails of the  
14 actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los  
15 Angeles, CA 90012. In the image, the video recording **GX010767** is paused at 0:01:49 (one  
16 minute and forty-nine seconds) and depicts the pathway of the Stanley Mosk Superior Court  
17 outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012 that leads to the  
18 second floor entrance of the courthouse. The original GoPro video recording was created on  
19 December 5, 2025, at 1:55 PM. Please see attached.

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

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28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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**Phone:** 626.429.6578

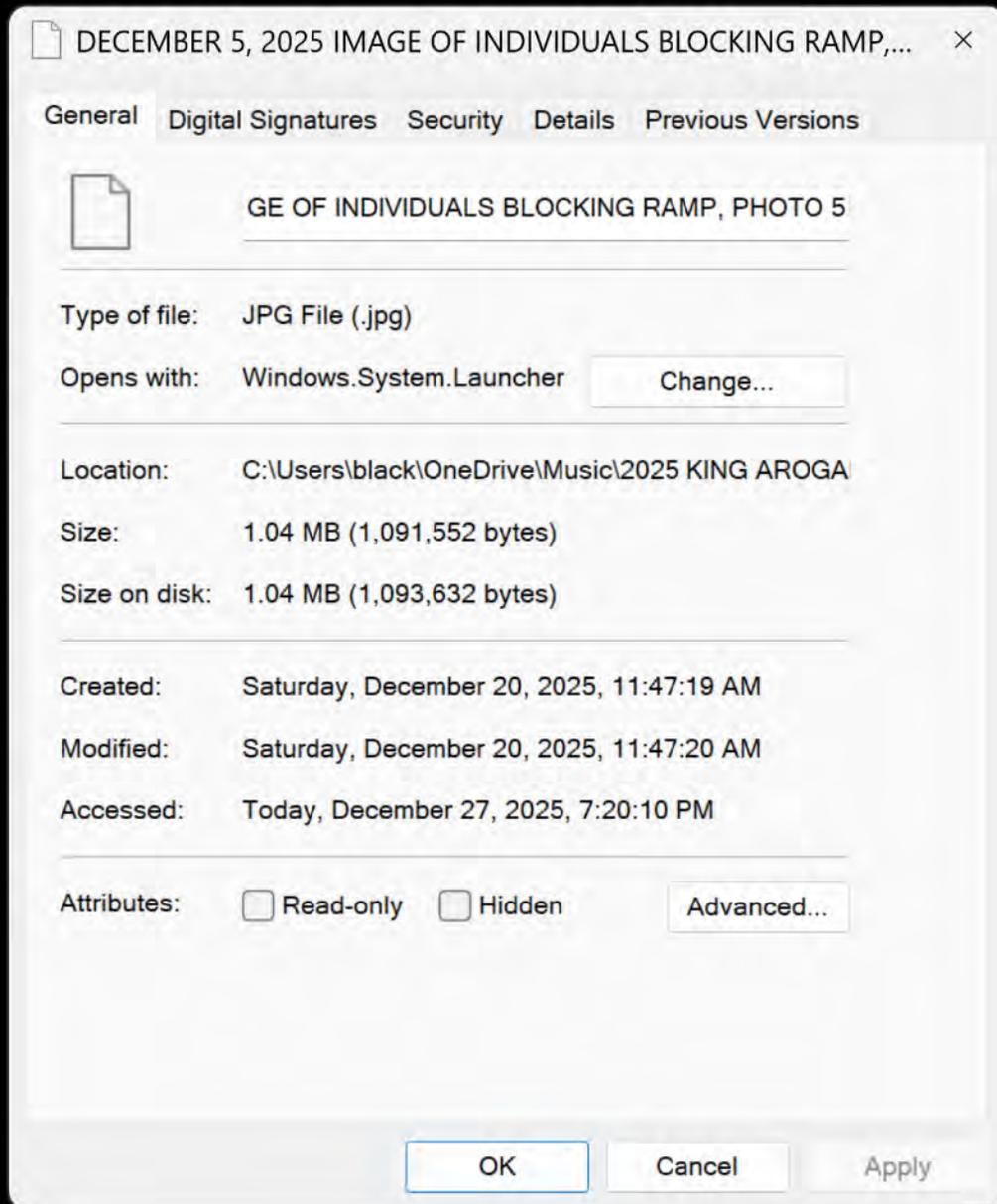


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1 16. Attached hereto as **Exhibit 13** is a true and correct digital copy of a photograph  
2 screenshot created on my desktop computer that was taken from a still video recording image  
3 created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010852**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 20, 2025, 1:58:20 PM, Size: 1.47 MB (1,547,886 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 1:58:20 PM, Modified On Saturday, December 20,  
10 2025, 1:58:20 PM, Accessed: Today, December 28, 2025, 8:13:37 AM. This photograph shows  
11 a still image of the original GoPro video recording, which was titled **GX010852** at the time of  
12 creation and filming. In the image, the video recording **GX010852** is paused at 0:01:50 (one  
13 minute and fifty seconds) and depicts a bicycle blocking guardrails and handrails of the actual  
14 Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los  
15 Angeles, CA 90012. In the image, the video recording **GX010852** is paused at 0:01:50 (one  
16 minute and fifty seconds) and depicts the pathway of the Stanley Mosk Superior Court outside  
17 handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012 that leads to the second  
18 floor entrance of the courthouse. The original GoPro video recording was created on December  
19 17, 2025, at 12:58 PM. Please see attached.

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

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**Phone:** 626.429.6578

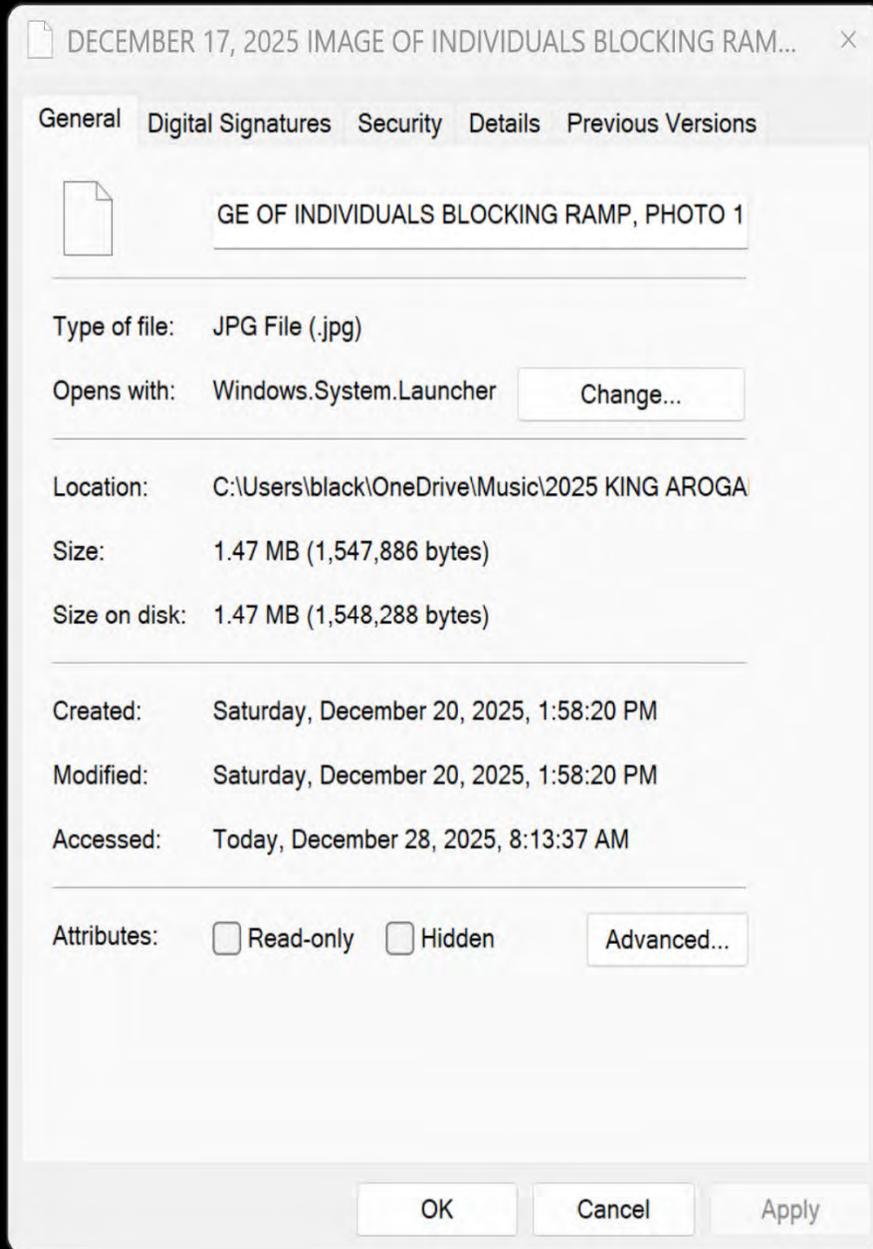
Media Player



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## DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

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Phone: 626.429.6578

1 17. Attached hereto as **Exhibit 14** is a true and correct digital copy of a photograph  
2 screenshot created on my desktop computer that was taken from a still video recording image  
3 created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010852**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 20, 2025, 2:02:52 PM, Size: 1.50 MB (1,579,244 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 2:02:52 PM, Modified On Saturday, December 20,  
10 2025, 2:02:52 PM, Accessed: Today, December 28, 2025, 9:09:41 AM. This photograph shows  
11 a still image of the original GoPro video recording, which was titled **GX010852** at the time of  
12 creation and filming. In the image, the video recording **GX010852** is paused at 0:01:53 (one  
13 minute and fifty-three seconds) and depicts a bicycle blocking guardrails and handrails of the  
14 actual Stanley Mosk Superior Court outside handicap ramp located at 111 North Hill Street, Los  
15 Angeles, CA 90012. In the image, the video recording **GX010852** is paused at 0:01:53 (one  
16 minute and fifty-three seconds) and depicts the pathway of the Stanley Mosk Superior Court  
17 outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012 that leads to the  
18 second floor entrance of the courthouse. The original GoPro video recording was created on  
19 December 17, 2025, at 12:58 PM. Please see attached.

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

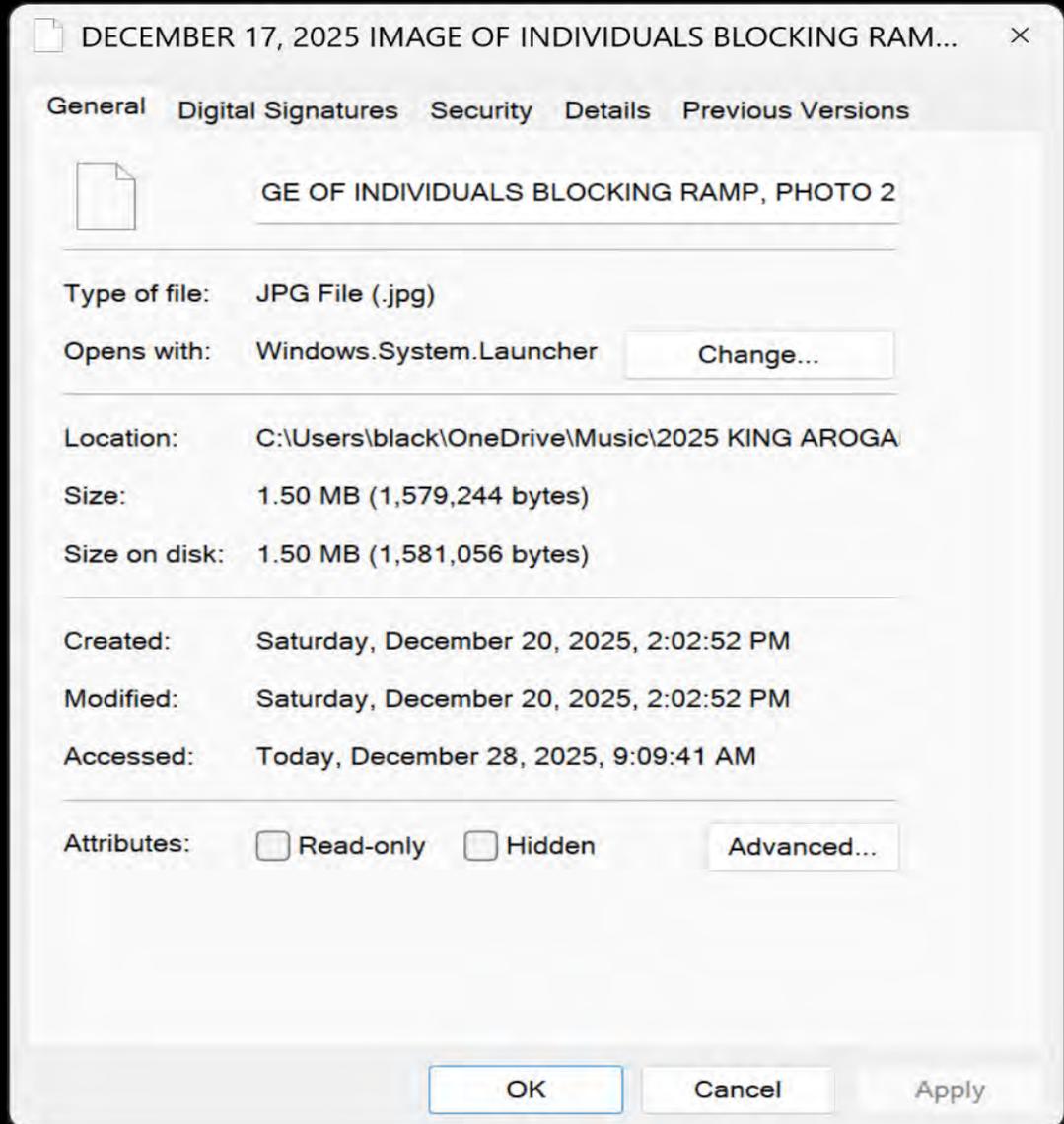
27  
28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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## DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

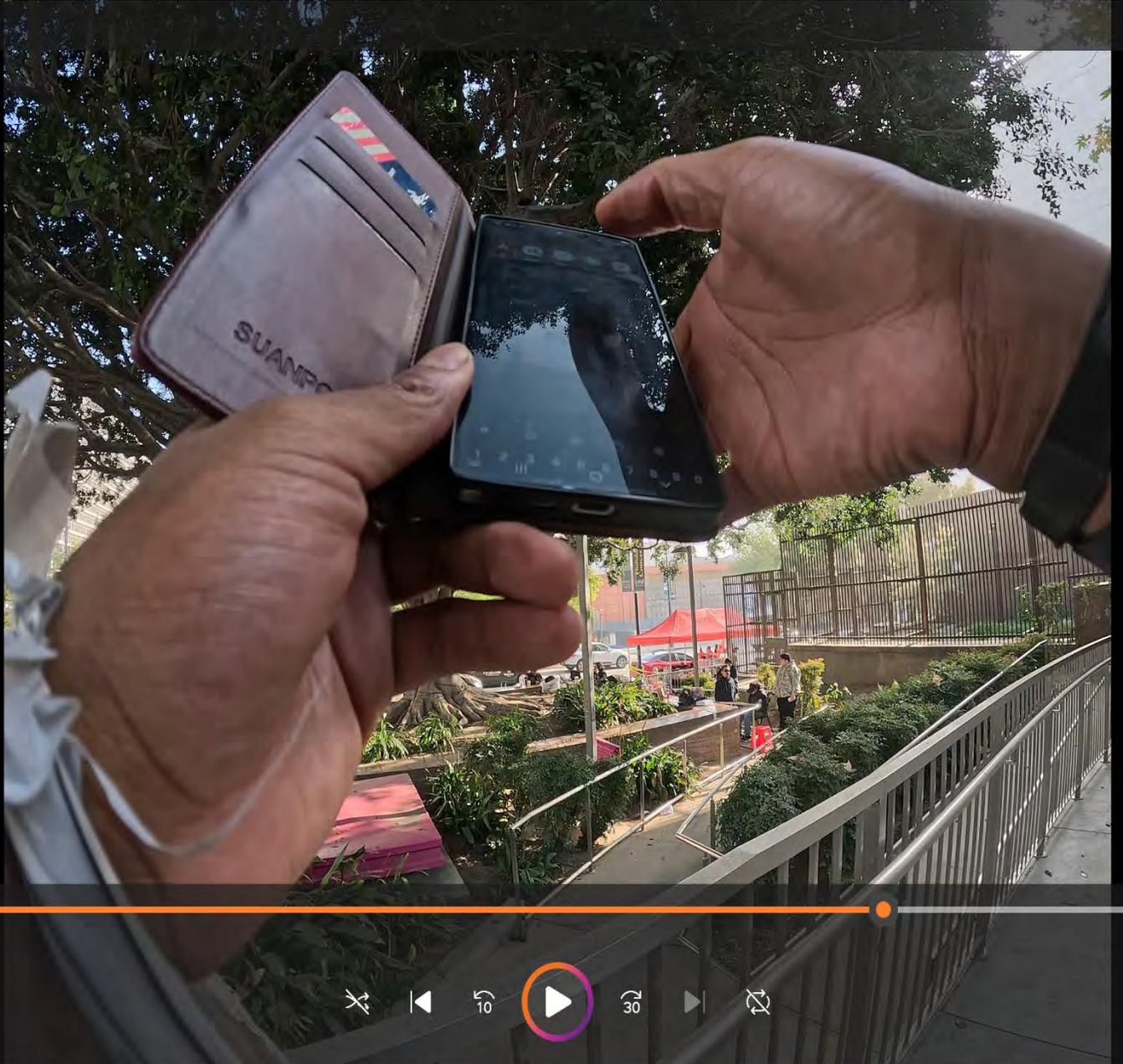
Neil E. Opdahl-Lopez, Esq (SBN # 277596)  
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Phone: 626.429.6578

1 18. Attached hereto as **Exhibit 15** is a true and correct digital copy of a photograph  
2 screenshot created on my desktop computer that was taken from a still video recording image  
3 created initially by my GoPro Hero 13 Black Action Camera, video recording **GX010852**. This  
4 photograph was taken on my personal laptop, which I use for personal use on a daily basis. This  
5 photograph was taken using the Microsoft Windows 11 Pro Snippet Screenshot application.  
6 Pursuant to the Federal Rules of Evidence, Rule 902(14), I hereby self-authenticate and certify  
7 this photograph by attaching a screenshot of the hash values of the photograph taken. Date:  
8 December 22, 2025, 12:00:34 PM, Size: 1.14 MB (1,203,277 bytes), Path of Internal storage:  
9 Created On Saturday, December 20, 2025, 12:00:35 PM, Modified On Saturday, December 20,  
10 2025, 12:00:18 PM, Accessed: Today, December 28, 2025, 12:00:18 PM. This photograph  
11 shows a still image of the original GoPro video recording, which was titled **GX010852** at the  
12 time of creation and filming. In the image, the video recording **GX010852** is paused at 0:02:28  
13 (two minutes and twenty-eight seconds) and depicts the pathway of the Stanley Mosk Superior  
14 Court outside handicap ramp located at 111 North Hill Street, Los Angeles, CA 90012 that leads  
15 to the second floor entrance of the courthouse being blocked by numerous individuals and  
16 chairs. The original GoPro video recording was created on December 17, 2025, at 12:58 PM.  
17 Please see attached.

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

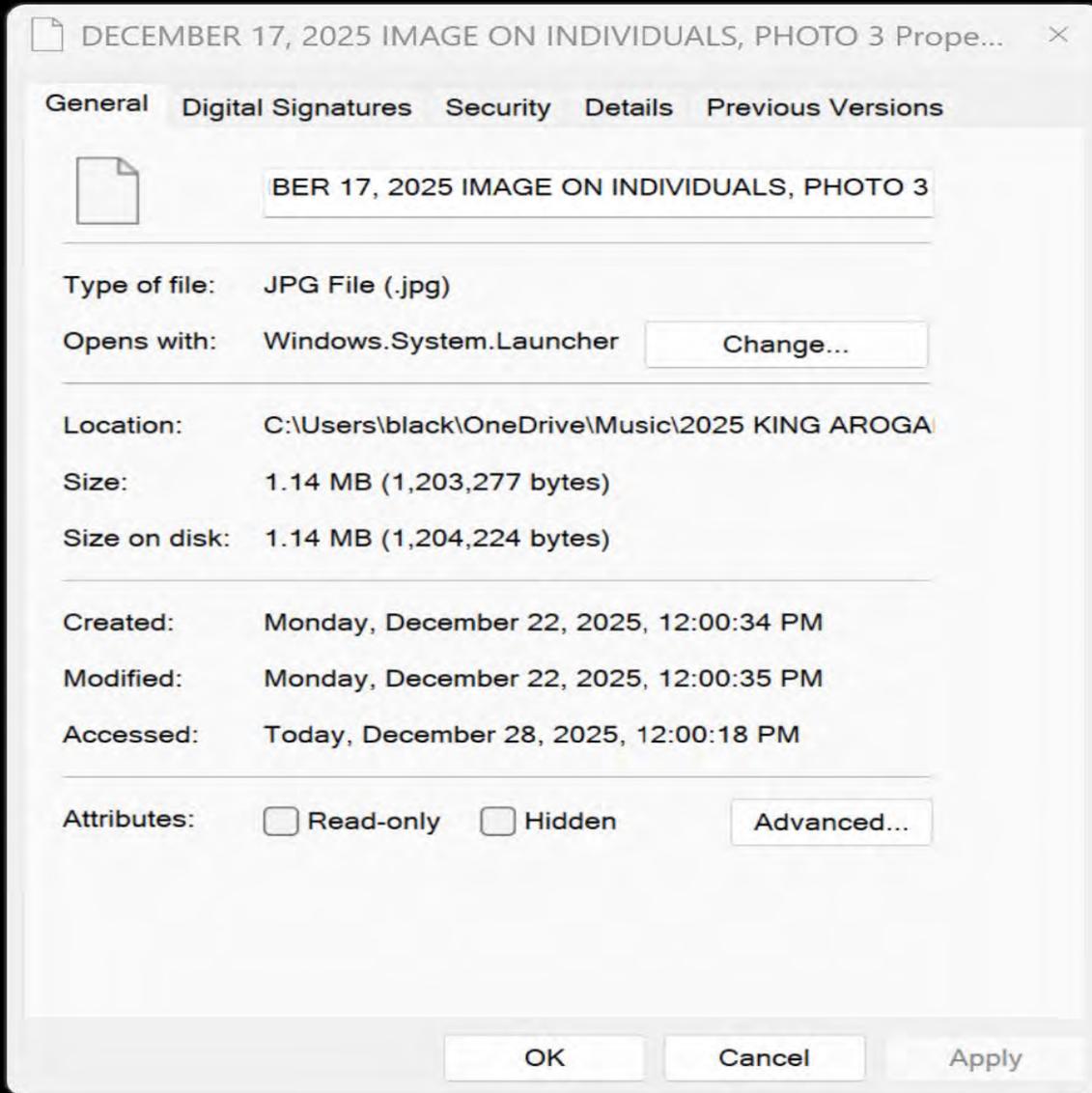
27  
28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
**Major, USMCR**  
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**DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

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## DECLARATION OF NON-PARTY AROGANT HOLLYWOOD

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

**DATE: December 28, 2025**

*Arogant Hollywood*

*King  
Arogant*

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**DECLARATION OF NON-PARTY AROGANT HOLLYWOOD**

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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.

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](mailto:attorney@neilopdahl.com)  
Phone: 626.429.6578

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

2  
3 3. My civil rights are protected under Title II and Title III of the Americans with  
4 Disabilities Act of 1990, the Unruh Civil Rights Act of 1959, and the California Disabled  
5 Persons Act of 1968 because I am disabled and cannot walk whatsoever without the assistance  
6 of a manual wheelchair.

7  
8 4. I have personal knowledge of myself, my activities, and my intentions, including those  
9 set out in the foregoing **Verified Appendix of Exhibits, Original Civil Rights Complaint, and**  
10 **Request for Injunctive Relief.**

11  
12 5. I verify under the penalty of perjury under the laws of the United States that the factual  
13 statements in the foregoing Verified Appendix of Exhibits, Original Civil Rights Complaint, and  
14 Request for Injunctive Relief concerning myself, my activities, and my intentions are true and  
15 correct, as are the factual statements concerning the County of Los Angeles and private party  
16 Defendants Tatianna Simoes-Silva, Jose Flores, Rapid Legal, InfoTrack US, Inc., Nationwide  
17 Legal LLC, & DOES 1-10 repeatedly allowing individuals to block my path on a Stanley Mosk  
18 Superior Court outside handicap ramp I needed to use for exercise while at the courthouse and I  
19 needed to use to safely arrive at the Stanley Mosk Superior Courthouse's second floor entrance.

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26 **VERIFICATION BY ALISON HELEN FAIRCHILD**

27  
28 **Neil E. Opdahl-Lopez, Esq (SBN # 277596)**  
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**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**

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

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26 **VERIFICATION BY ALISON HELEN FAIRCHILD**

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**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,** [rluna@lasd.org](mailto:rluna@lasd.org)
- Hilda Lucia Solis,** [firstdistrict@bos.lacounty.gov](mailto:firstdistrict@bos.lacounty.gov)
- Shawn Kehoe,** [skehoe@lasd.org](mailto:skehoe@lasd.org)
- Gerardo Valdivia,** [gvaldivia@lasd.org](mailto:gvaldivia@lasd.org)
- Francisco Garibay** [fgaribay@bos.lacounty.gov](mailto:fgaribay@bos.lacounty.gov)
- Nicole Amber Davis-Tinkham** [ndavis-tinkham@counsel.lacounty.gov](mailto:ndavis-tinkham@counsel.lacounty.gov)  
[nikki.davis1212@gmail.com](mailto:nikki.davis1212@gmail.com)
- Holly J. Mitchell** [hollyjmitchell@bos.lacounty.gov](mailto:hollyjmitchell@bos.lacounty.gov)
- Deni K. Butler** [dbutler@lasuperiorcourt.org](mailto:dbutler@lasuperiorcourt.org)
- David Nill** [dsn@rapidlegal.com](mailto:dsn@rapidlegal.com)
- Nationwide Legal LLC** [legal@nationwidelegal.com](mailto:legal@nationwidelegal.com)
- InfoTrack US, Inc.** [help@infotrack.com](mailto:help@infotrack.com)

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  
13  
14 BY:

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

16 **Major, USMCR**

17 **San Bernardino, CA 92408**

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8 **Attorney for Plaintiff**

9  
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15 **Case No. 5:25-cv-03510-GHW(AJR)**  
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**EXHIBIT 1**



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Video playback controls including a play button, a 10-second rewind button, a 30-second fast forward button, and a volume icon.

System tray icons including a list icon, a volume icon, a share icon, a refresh icon, and a menu icon.

#322



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8 **Attorney for Plaintiff**

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**EXHIBIT 2**



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#325



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**EXHIBIT 3**

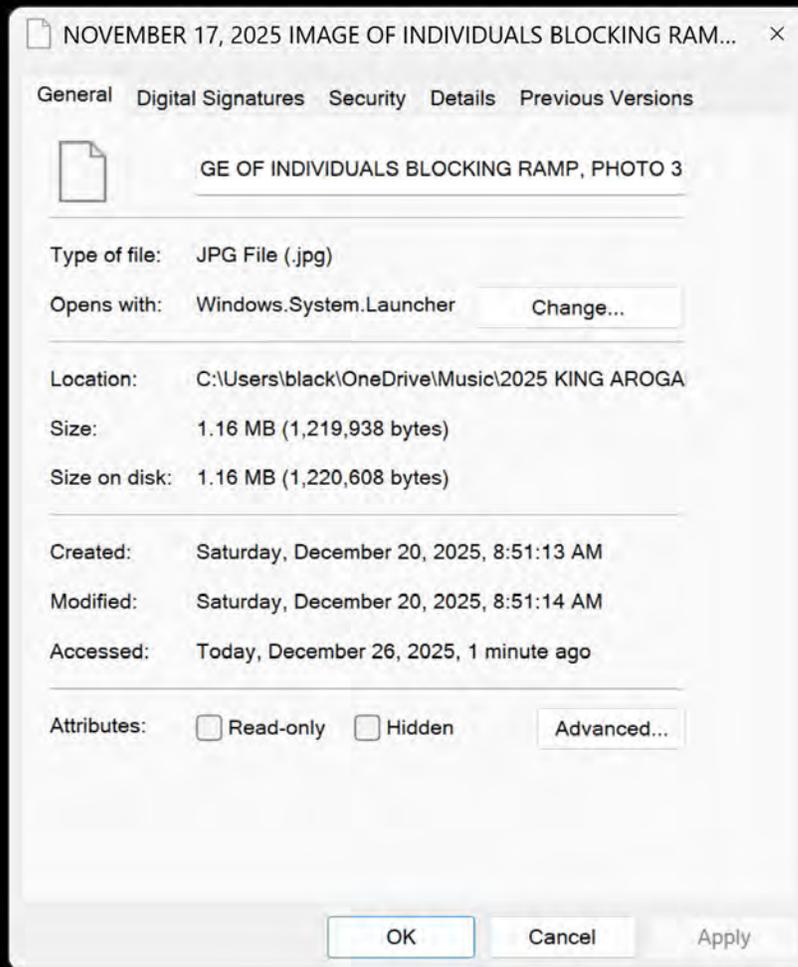


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8 **Attorney for Plaintiff**

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**EXHIBIT 4**

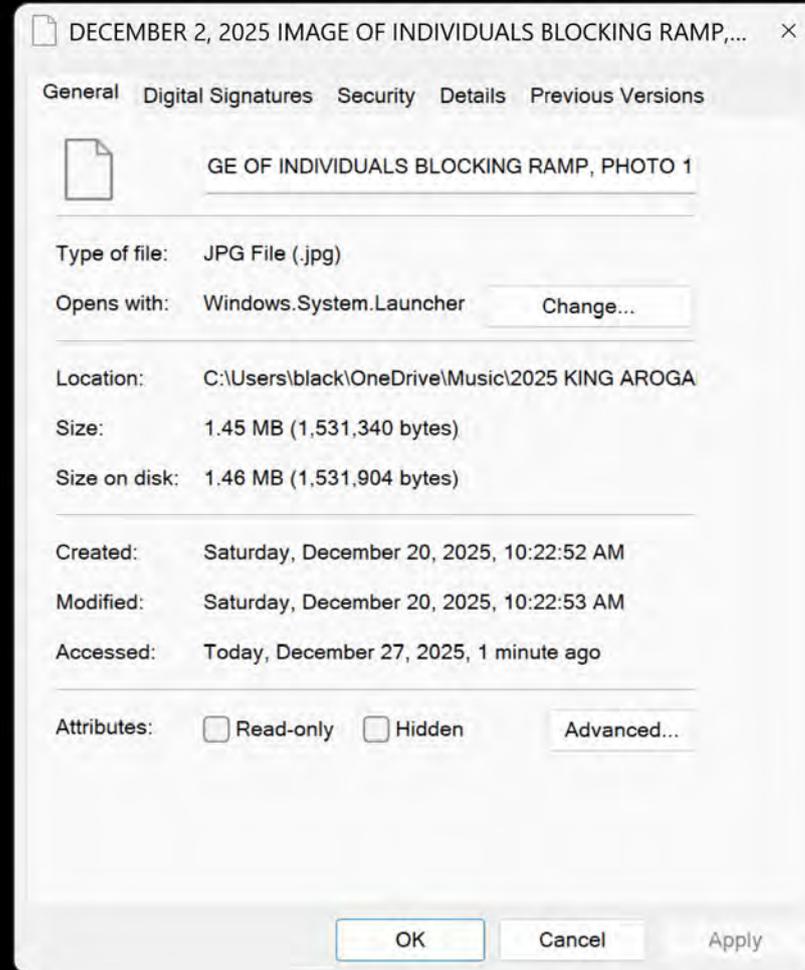


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8 **Attorney for Plaintiff**

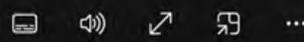
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10 *Alison Helen Fairchild v. Hilda Lucia Solis, et al*

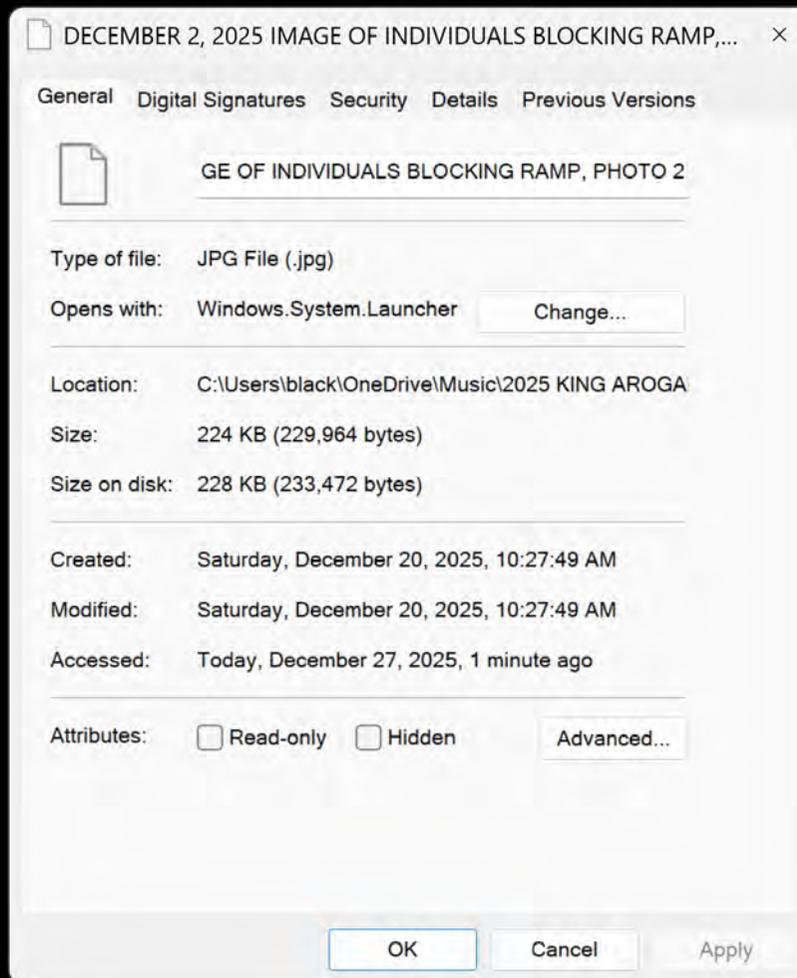
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8 **Attorney for Plaintiff**

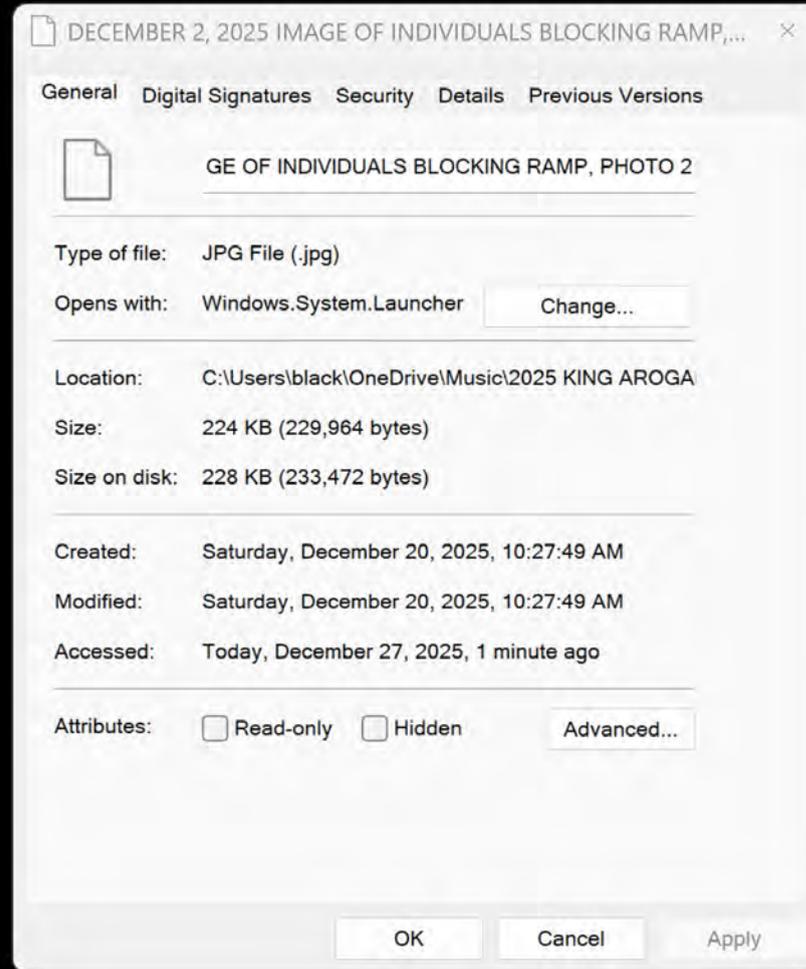
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**EXHIBIT 6**





1 *Neil Opdahl-Lopez, Esq. (SBN # 277596)*  
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8 **Attorney for Plaintiff**

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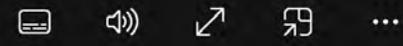
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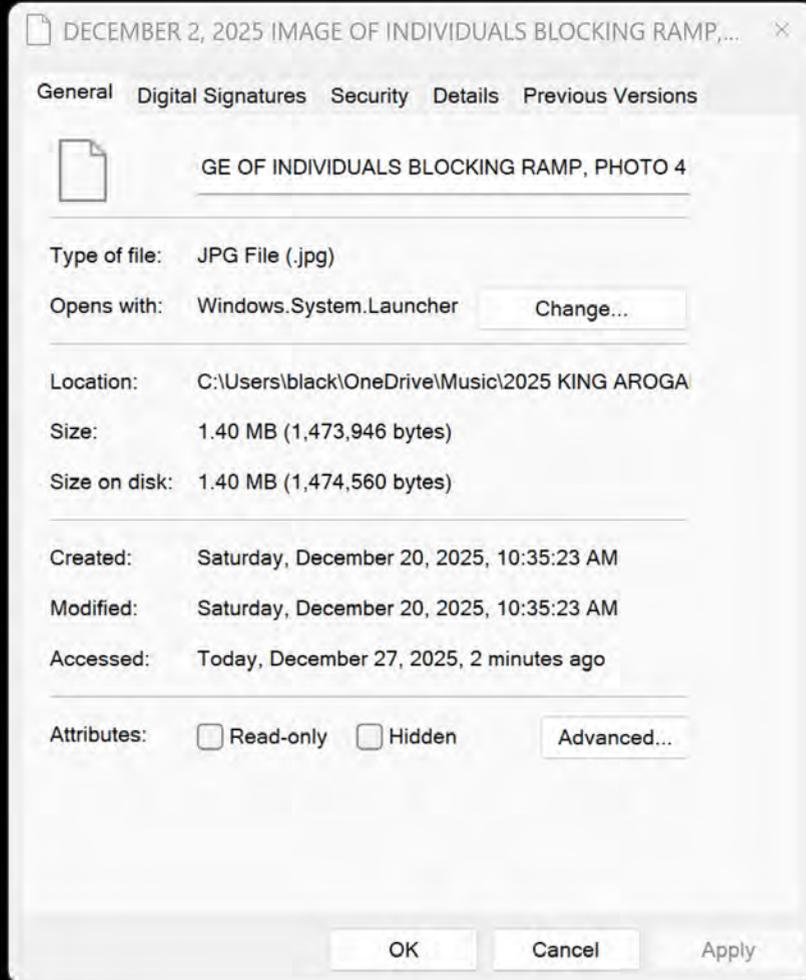


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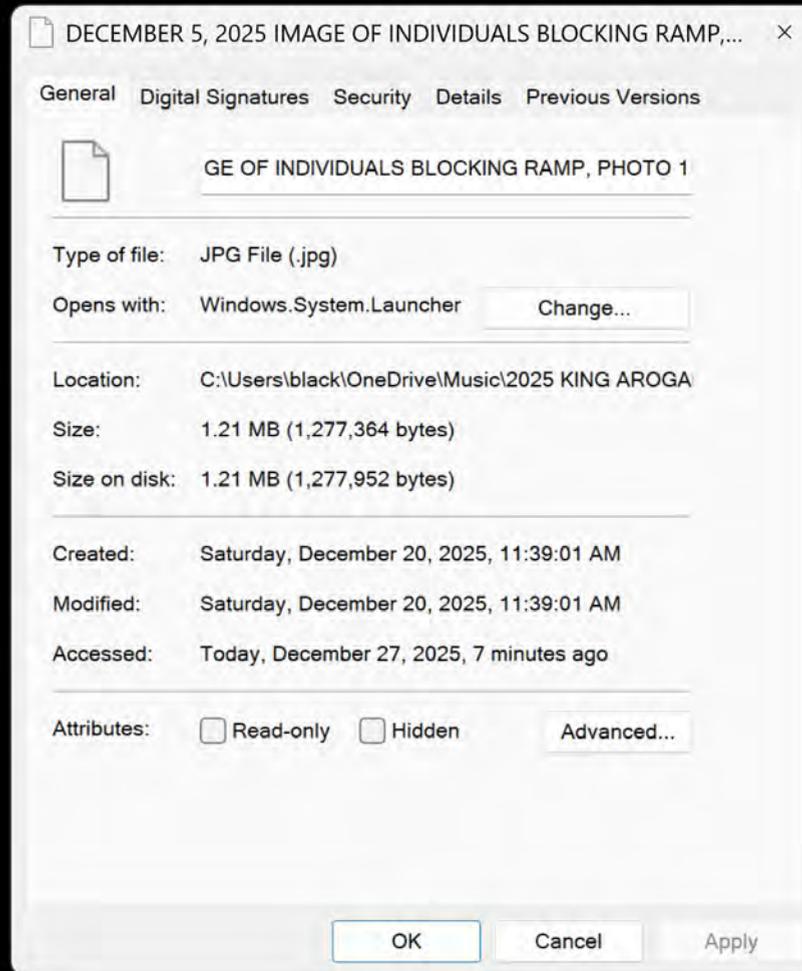
8 **Attorney for Plaintiff**

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8 **Attorney for Plaintiff**

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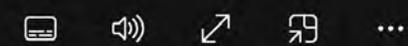
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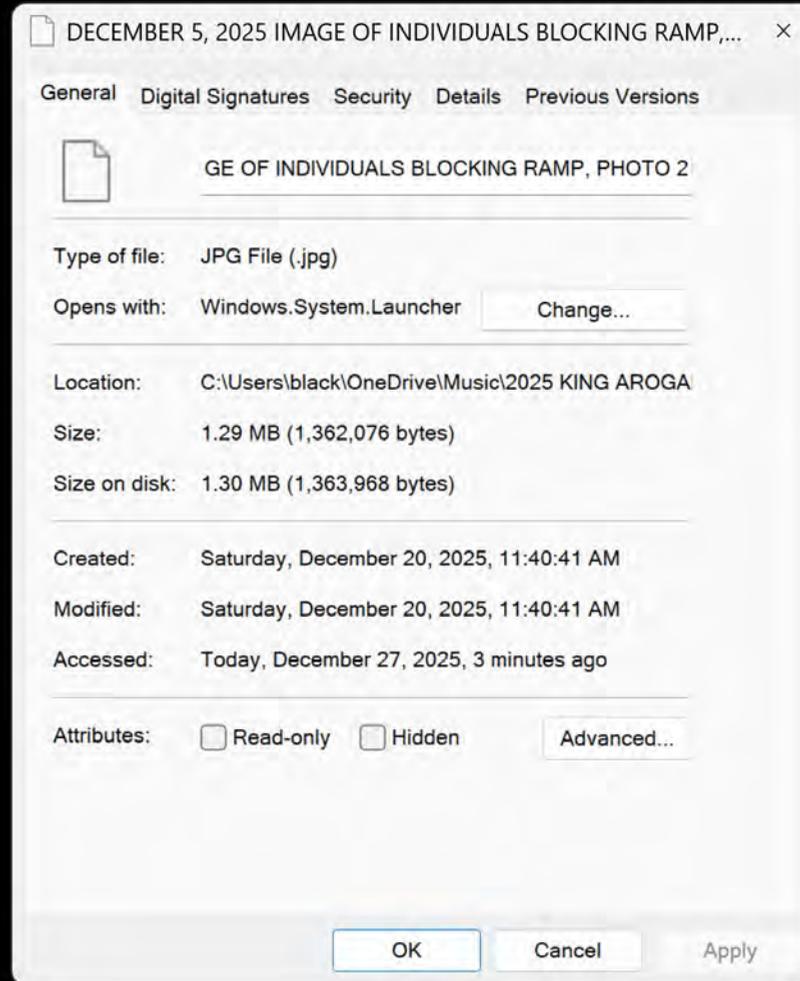


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8 **Attorney for Plaintiff**

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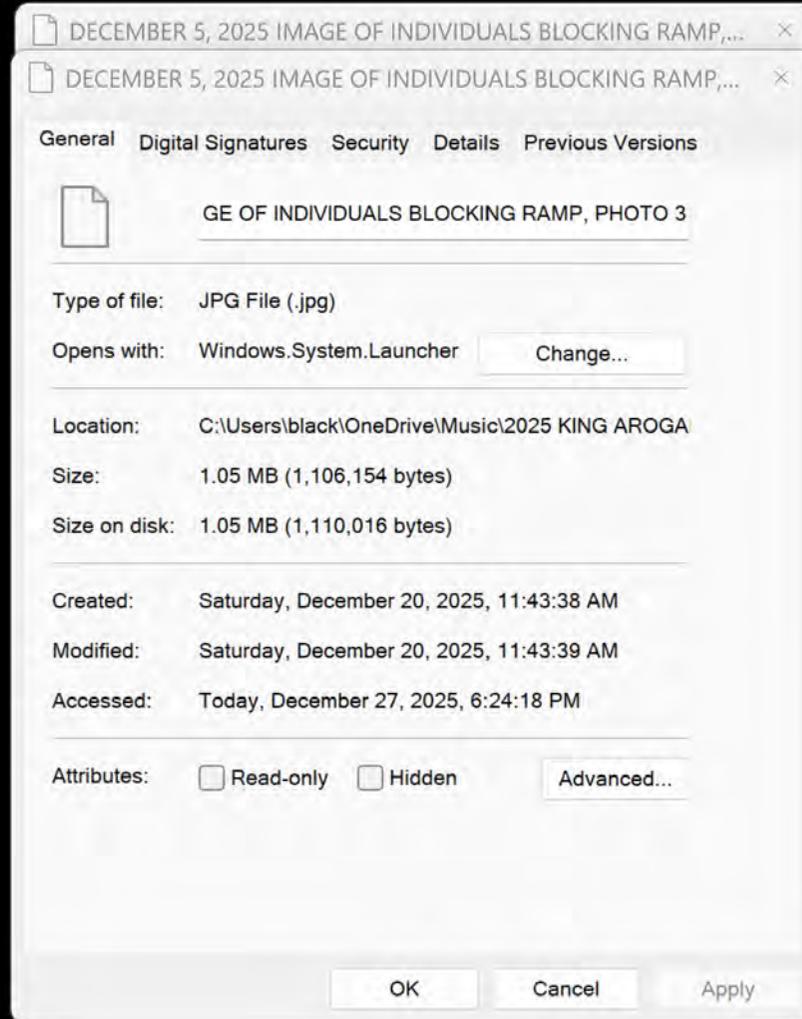


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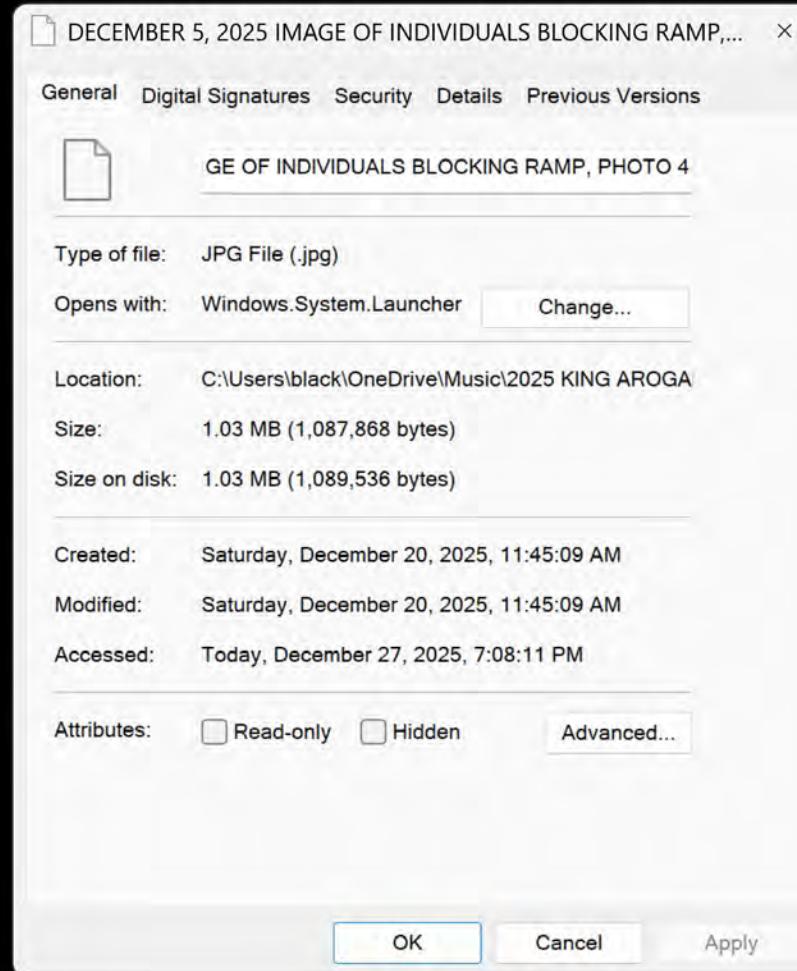
**EXHIBIT 11**



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8 **Attorney for Plaintiff**

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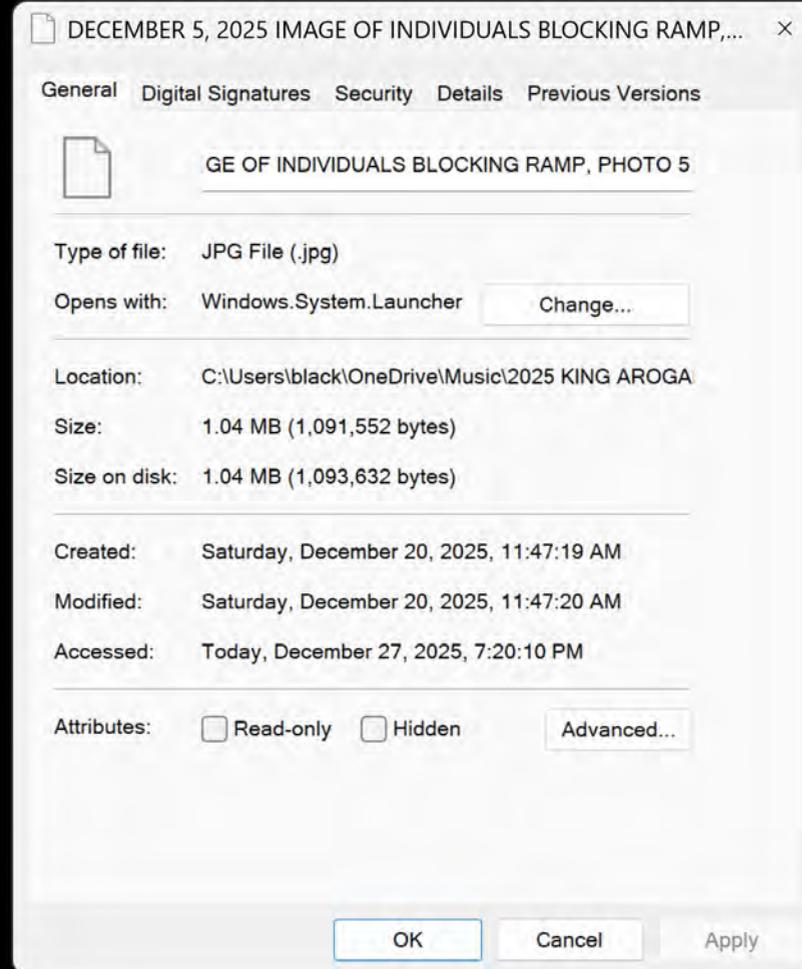


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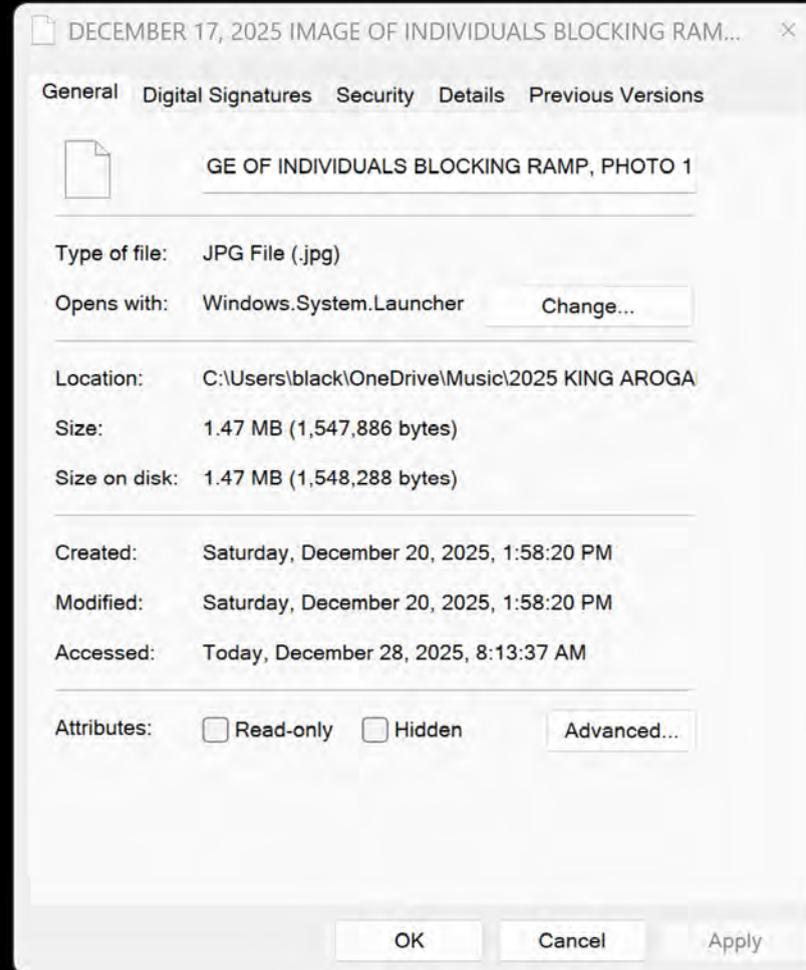


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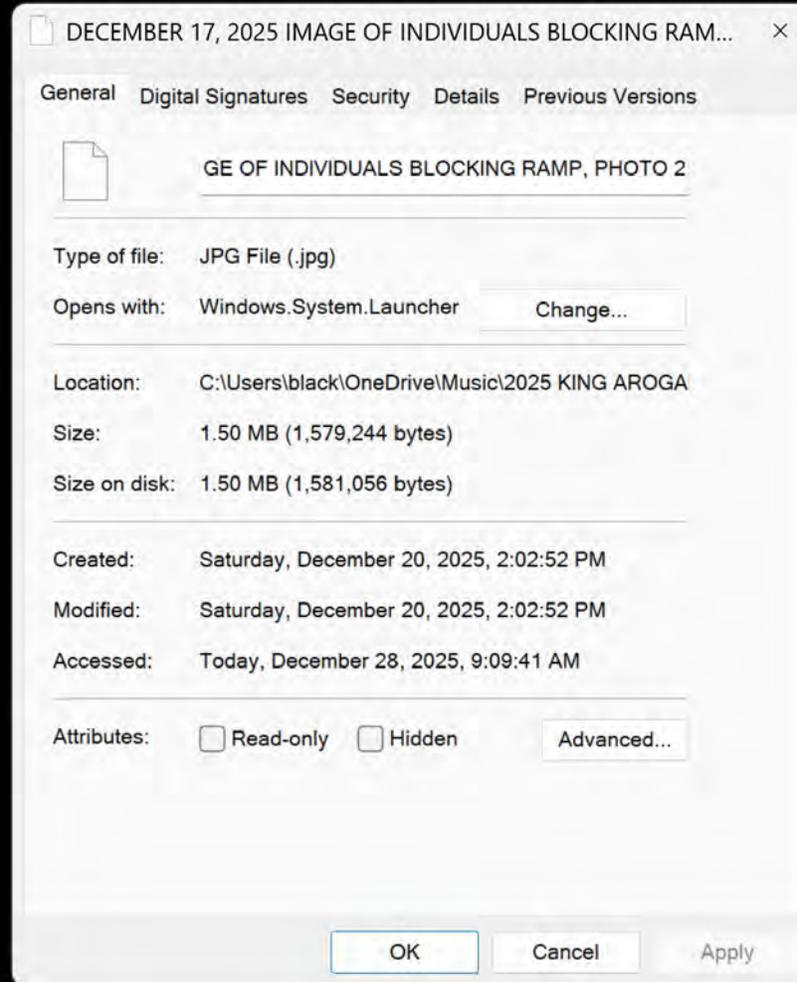


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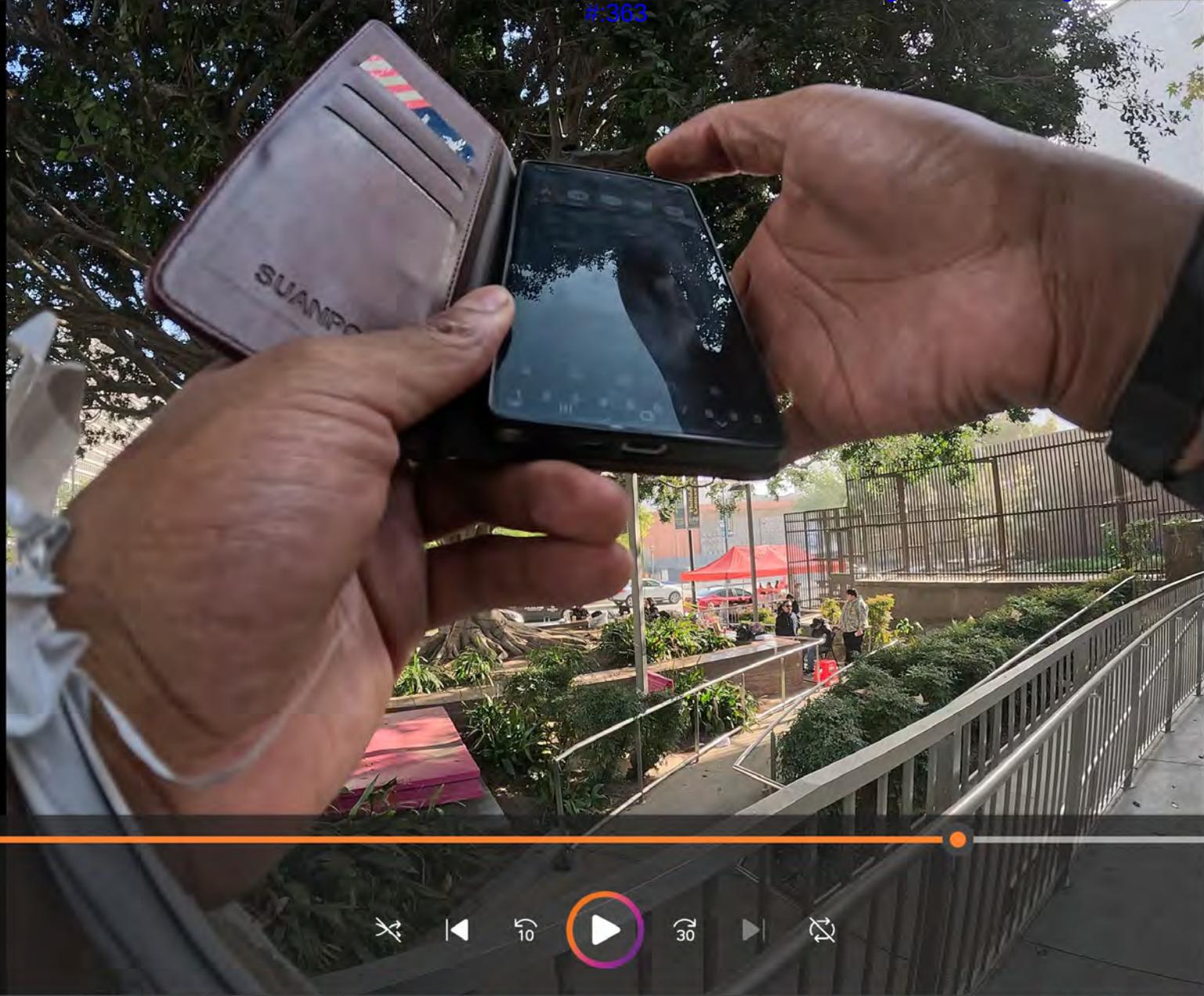


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10 *Alison Helen Fairchild v. Hilda Lucia Solis, et al*

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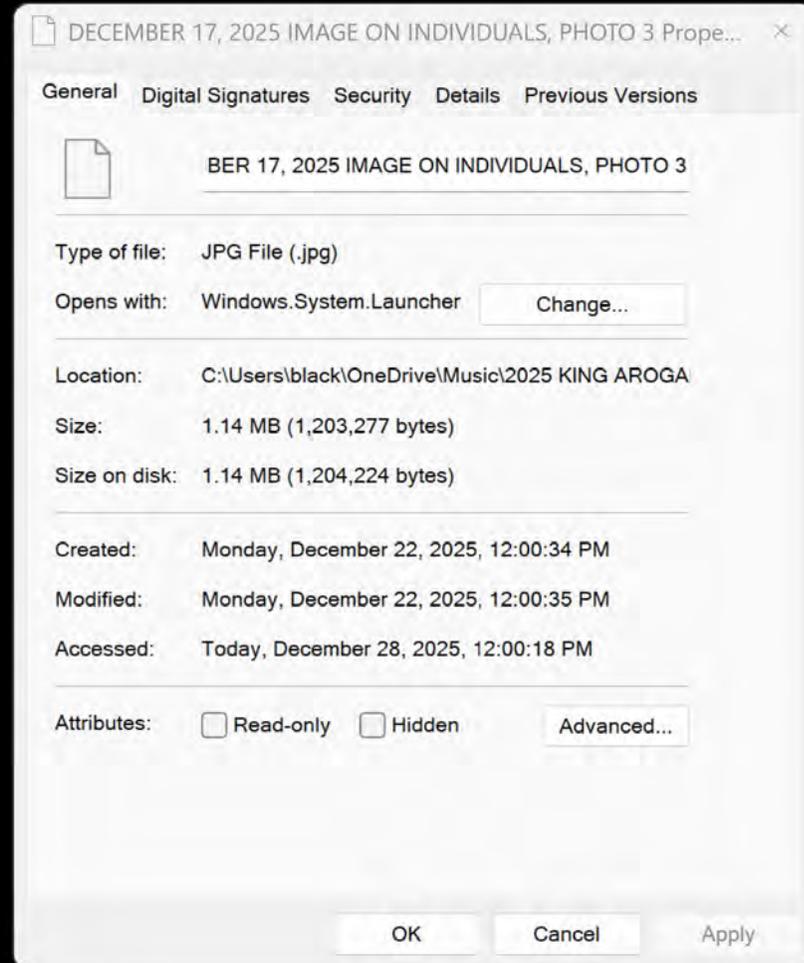


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**Subject: General Public Comment – Rent Price-Gouging Restrictions**

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.