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2010 JUN 11 PM 3:39

CLERK US DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY es DEPUTY

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2 San Diego, Ca. 92101  
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4 Attorney for Plaintiffs

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6  
7 UNITED STATES DISTRICT COURT  
8 SOUTHERN DISTRICT OF CALIFORNIA

9 '10 CV 1261 LAB WVG

10 GIRLS CLUB OF SAN DIEGO, INC.,  
CLIFTON D. BLEVINS, JOANNE HOLIDAY,  
11 L.J. JAMESON, GEORGE JORDAN, JAIME  
VALDEZ, and GWEN WILLS, BOB JOHNSON,  
12 and MARY ANN WATSON, JOE CAPRINI,  
RAY ROJAS RENEE HALL, AKULLU KEFLEZI-  
13 GHI AND VONETTA BEALE,

14 Plaintiffs,

15 vs

16 THE CITY OF SAN DIEGO, THE EVENING  
TRIBUNE, CHANNEL 10 KGTV, MCGRAW HILL  
17 BROADCASTING COMPANY, WELLS FARGO  
BANK, N.A., ETTA M. KEELER, ARDELIA  
18 "De De" MCCLURE, LINDA NICKERSON,  
MAXINE SHERARD, PEARLIE BOGANS, RAY  
19 KILLENS, MARTINE MARTIN, RICHARD  
WILLIAMS, STACEY LOMEDICO, LINDA  
20 TOUSELY, SAN DIEGO POLICE I, POLICE  
OFFERER II, POLICE OFFICER III,

21 Defendants.

) CASE NO:  
)  
) COMPLAINT FOR DAMAGES  
) UNDER 42 U.S.C §1983,  
) 1981, 1985, THE CIVIL  
) RIGHTS ACT OF 1971, 19  
) 64; RULE 60(b)(3).

) JURY TRIAL REQUESTED  
) Pursuant to rule 38 of  
) F.R.C.P.

22  
23 B. Jurisdiction

24 This action is brought for a declaratory judgment, injunctive relief, and damages  
25 pursuant to 42 U.S.C. §§ 1981, 1983, 1985 and the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the  
26 United States Constitution. The court has jurisdiction over the lawsuit because the  
27 action arises under 42 U.S.C. Section 1983, and the 1<sup>st</sup>, 5<sup>th</sup> and 14<sup>th</sup> Amendments of  
28 the Constitution. The amount of controversy exceeds \$205,000.00, exclusive of  
interest and costs.

CR

PARTIES

1 Plaintiff Girls Club of San Diego, Inc., is a nonprofit  
2 Corporation pursuant to the laws of California. It operates  
3 solely within the County of San Diego.

4 All individual plaintiffs are Members of the Board of  
5 Directors for said Girls Club or subtenants thereof.

6 Defendant City of San Diego is the landlord of the Girls  
7 club and also a Municipality.

8 All other Defendants are employees of said City of San  
9 Diego or in some unofficial manner connected to said City.

10 FACTS OF THE CASE

11 1. In an effort to dislodge plaintiffs from the premises  
12 located at 606 S. 30th Street, City of San Diego, California  
13 the defendants, and each of them, came together at certain  
14 times and places and publicly, falsely and with malice and  
15 animus carried out a series of malicious acts against the  
16 plaintiffs, including use of police officers and force to  
17 disposses the plaintiffs of the premises.

18 2. I In so doing the defendants accused Plaintiffs of  
19 misuse of funding, holding parties in which criminal conduct  
20 occurred, abused children, among other things, all to plaintiffs  
21 damage and loss of personal reputation and good health.

22 3. As a result of defendants, and each of them, actions herein  
23 plaintiffs, and each of them, are not able to enjoy their pre-  
24 vious good reputations due to false T.V. showings, and false  
25 newspaper articles published by defendants all with the purpose  
26 of causing harm and damage to plaintiffs.  
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Plaintiff refers to and incorporates herein paragraphs 1 through 3 herein and alleges that by way of the foregoing acts and failures to act of defendants and each of them defendants violated plaintiff's rights pursuant to 42 U.S.C. §1981.

Plaintiff refers to and incorporates hereat paragraphs 1- 3 of this Complaint and alleges that defendants and each of them, have violated and deprived him of his constitutional rights pursuant to 42 U.S.C. §1983.

Plaintiff refers to and incorporates hereat paragraphs 1- 3 of this same Complaint and alleges that thereby defendants and each of them have violated his rights pursuant to 42 U.S.C. §1985.

Plaintiff refers to and incorporates hereat paragraphs 1- 3 of this same Complaint and alleges that defendants and each of them thereby, have violated his rights pursuant to the Civil Rights Act of 1871 and such other civil rights acts in its progeny, progeny, including that of 1964 and the Handicap Accommodations Act.

Plaintiff refers to and incorporates hereat paragraphs 1- 3 of this same Complaint and alleges thereby that defendants have thereby intentionally damaged him in his mental and emotional state of being.

Plaintiff refers to and incorporates herein paragraphs 1- 3 of this same Complaint and alleges thereby, that defendants, and each of them by means of their negligent acts, injured plaintiff thereby in his person as to render him in shock and mental consternation.

Plaintiff refers to and alleges, thereby, to paragraphs 1- 3 of this same Complaint and incorporates the same herein by that reference and thereon alleges that defendants have injured plaintiff and damage here by way of the negligent maintenance of the condition of their premises.

That in doing the aforementioned acts and failures to act, defendants have caused plaintiff damages in an amount exceeding \$10,000.00 and in accordance with the proof at the time of trial.

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1 WHEREFORE plaintiffs pray for judgment for costs of  
2 suit and for such relief as is just and fair and equitable  
3 under the circumstances,

4 For General and Compensatory damages in the amount  
5 of 100,000,000.00.

6 For Special Damages according to proof upon trial  
7 of the matter.

8 For punitive and exemplary damages according to  
9 proof.

10 Dated: June 10, 2010.

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12  
13 BY:

*Clifton D. Blevins*

14 CLIFTON D. BLEVINS,  
15 Attorney for Plaintiffs.

Court Name: USDC California Southern  
Division: 3  
Receipt Number: CAS014544  
Cashier ID: bhartman  
Transaction Date: 06/11/2010  
Payer Name: CLIFTON D BLEVINS

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CIVIL FILING FEE  
For: GIRLS CLUB OF SD V CITY OF SD  
Case/Party: D-CAS-3-10-CV-001261-001  
Amount: \$350.00

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CHECK  
Check/Money Order Num: 2074  
Amt Tendered: \$350.00

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Total Due: \$350.00  
Total Tendered: \$350.00  
Change Amt: \$0.00

There will be a fee of \$45.00  
charged for any returned check.

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JS 44 (Rev. 12/07)

CIVIL COVER SHEET

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The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

CLERK US DISTRICT COURT SOUTHERN DISTRICT OF CALIFORNIA

I. (a) PLAINTIFFS GIRLS CLUB OF SAN DIEGO, INC., et al. (b) County of Residence of First Listed Plaintiff SAN DIEGO (EXCEPT IN U.S. PLAINTIFF CASES) (c) Attorney's (Firm Name, Address, and Telephone Number) CLIFTON D. BIEVINS 1108 UNION ST. STE. 201 SAN DIEGO, CA 92101 619 5665-8623

DEFENDANTS CITY OF SAN DIEGO et al. DEPUTY County of Residence of First Listed Defendant SAN DIEGO (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.

Attorney: 10 CV 1261 LAB WVG

II. BASIS OF JURISDICTION (Place an "X" in One Box Only) 1 U.S. Government Plaintiff 2 U.S. Government Defendant 3 Federal Question (U.S. Government Not a Party) 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant) (For Diversity Cases Only) Citizen of This State Citizen of Another State Citizen or Subject of a Foreign Country Incorporated or Principal Place of Business In This State Incorporated and Principal Place of Business In Another State Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only) Table with categories: CONTRACT, REAL PROPERTY, PERSONAL INJURY, PERSONAL PROPERTY, FORECLOSURE/PENALTY, BANKRUPTCY, FEDERAL STATUTES, FEDERAL TAX SUITS, IMMIGRATION, FEDERAL STATUTES.

V. ORIGIN (Place an "X" in One Box Only) Original Proceeding 2 Removed from State Court 3 Remanded from Appellate Court 4 Reinstated or Reopened 5 Transferred from another district (specify) 6 Multidistrict Litigation 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 42 USC 1983, 1995, 1961 Brief description of cause: Father to provide competent hospital care

VII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMANDS: \$10,000 JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE DOCKET NUMBER

SIGNATURE OF ATTORNEY OF RECORD: Clifton D. Bievin DATE: June 10, 2010

OR OFFICE USE ONLY RCP# 14544 \$350 6/11/10 BH