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**FILED**  
 Superior Court Of California  
 County Of Los Angeles

**DEC 21 2016**

Sherri R. Carter, Executive Officer/Clerk  
 By Charlo L. Coleman, Deputy

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 Duffy-Lewis

7 Attorneys for Plaintiff, the People of the State of California

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 9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
 10 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

**ORIGINAL**

11 THE PEOPLE OF THE STATE OF CALIFORNIA,  
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 13 Plaintiff,  
 14 vs.  
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 16 CLEAN UP AMERICA, Inc., a California  
 17 Corporation, CLEAN UP AMERICA  
 18 SANITATION LLC, a California Limited  
 19 Liability Company, MICHAEL JOHN  
 20 MERAZ, aka MICHAEL RIOS ERAZ, an  
 individual, MERCO LLC, a California Limited  
 Liability Company; and DOES 1 through 50,  
 inclusive,  
 21 Defendants.

Case No.: **BC 6 444 20**  
**COMPLAINT FOR EQUITABLE  
 RELIEF AND CIVIL PENALTIES FOR:**  
 1. **UNLAWFUL BUSINESS PRACTICES  
 IN VIOLATION OF BUSINESS AND  
 PROFESSIONS CODE SECTION 17200;**  
 2. **PUBLIC NUISANCE IN VIOLATION  
 OF CIVIL CODE SECTION 3479 et seq.**

1 Plaintiff, the People of the State of California ("People"), complaining of the above-  
2 named Defendants ("Defendants"), alleges as follows:

3 I. NATURE OF ACTION

4 1. Despite repeated directives and orders to comply, in blatant disregard of  
5 regulations and permitting requirements, and contrary to the approved use of the subject  
6 property, Clean Up America, Inc. accumulated more than 22 million pounds of construction  
7 debris at 2900 East Lugo.

8 2. The property ("Lugo property")<sup>1</sup> is located between two food processing plants  
9 and is just blocks east of the Los Angeles River. Over a period of at least two years, Clean Up  
10 America, Inc. ("Clean Up America") created a mountain of refuse the size of a multistory  
11 building at the Lugo property. The more than 22 million pounds of construction debris collected  
12 on site far exceeded the 2.8 million pounds of material that Clean Up America was approved to  
13 store in piles no higher than 12 feet with fire access lanes and setbacks from adjacent properties.  
14 Rather, Clean Up America created a pile of debris covering the property, approximately 250 feet  
15 wide by 252 feet long and more than 25 feet high. In defiance of numerous written notices,  
16 "action plans," stipulated agreements, notices, and orders from regulatory agencies to remove the  
17 debris, Clean Up America continued to heap more and more refuse onto the pile. After more  
18 than a year of violations, on August 31, 2016, the Local Enforcement Agency ("LEA")<sup>2</sup> verbally  
19 ordered Defendants to immediately cease accepting incoming material and immediately remove  
20 all refuse on site.

21 3. On September 18, 2016 -- less than three weeks later -- Clean Up America's  
22 mountain of refuse caught fire. The fire continued to burn and smolder for over six weeks,

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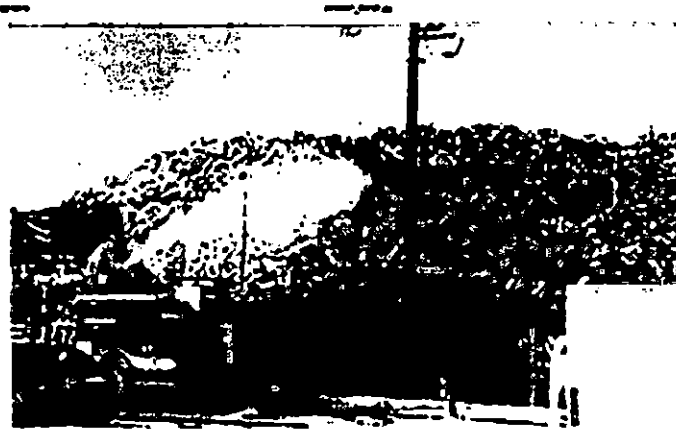
<sup>1</sup> 2900 Lugo Street is legally defined in a grant deed dated October 31, 2011, from Citizens Business Bank, grantor,  
to Merco LLC, a California Limited Liability Company, grantee as Lot 1 of Tract No. 13269 in the City of Los  
Angeles, County of Los Angeles, State of California, as per map recorded in Book 269, page 50 of Maps in the  
Office of the County Recorder of said County. Assessor's Parcel Number: 5169-026-020.

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<sup>2</sup> The Local Enforcement Agency (LEA) is the designated local enforcement entity of the California Department of  
Resources Recycling and Recovery ("CalRecycle"), the state regulatory authority which oversees solid waste  
facilities.

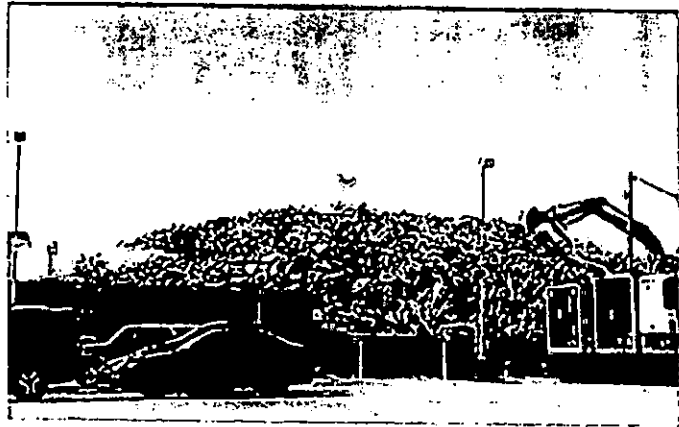
1 requiring the Los Angeles Fire Department ("LAFD") to deploy resources for 24-hour fire  
2 suppression and supervision until the blaze deep within the debris pile was extinguished.

3 4. Defendants' mountain of trash left no room for the fire access lanes or property  
4 line setbacks on the parcel required by law. As a result, initially, LAFD could not obtain direct  
5 access to the fire; and, instead had to aim streams of water onto the pile from an adjacent  
6 property.

7 5. Defendants failed to comply with LAFD orders to assist its fire suppression  
8 efforts, including (1) obtaining heavy equipment to reduce the pile, and (2) capturing the runoff  
9 contaminated with high levels of E.coli<sup>3</sup> bacteria. For weeks, LAFD could do no more than aim  
10 water at the mountain of refuse while the Los Angeles City Department of Public Works, Bureau  
11 of Sanitation ("LASAN") trucked away more than 22 million pounds of debris.



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28 <sup>3</sup> Escherichia coli is a type of bacteria that lives in the intestinal tracts of humans and animals. Some types of E. coli can cause intestinal infection.



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6. Clean Up America never operated its business lawfully at the Lugo site as it had never obtained the necessary Certificate of Occupancy ("C of O") from the City of Los Angeles' Department of Building and Safety for the change of use to a recycling facility.

7. Despite its lack of a C of O, Clean Up America obtained a permit from the State of California's Department of Resources Recycling and Recovery ("CalRecycle") to operate a medium volume Construction and Demolition and Inert ("CDI") Processing Facility at the Lugo property.

8. That CalRecycle permit allowed Clean Up America to store no more than 1,401 tons (2.8 million pounds) of material on the property in piles no higher than 12 feet. Further, the permit and California law required Clean Up America to sort the construction debris (typically cement, wood, and metal) and remove it from the site within 15 days of dumping at the Lugo property. At least 70 percent of the material taken to the CDI facility was required to be recycled (in order to reduce the load on solid waste facilities).

9. Defendants failed to comply with CalRecycle's CDI permit requirements. At the Lugo Property, construction debris was no longer being sorted or removed within the required 15 days. Instead, incoming debris was piled on top of the existing pile of refuse. The mountain of refuse grew so large and out of control that it completely buried the very machines required to sort the debris.



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9       10.     On July 14, 2015, the LEA inspected Clean Up America and found that (a) the  
10 volume of CDI debris was over the permit limit, (b) the CDI material was not processed within  
11 15 days, and (c) the CDI debris piles were unstable. The LEA issued a Notice of Violation to  
12 Clean Up America for not complying with the terms of the permit. By August 2015, Clean Up  
13 America entered into an "action plan" with the LEA to bring the Clean Up America facility into  
14 compliance with the permit requirements.

15       11.     Despite the "action plan," and later Stipulated Agreement (CUA SA 16-01)  
16 entered into on February 12, 2016, Clean Up America continued to dump more and more refuse  
17 onto the pile without having removed any significant quantity of CDI debris. Defendants  
18 continued to ignore the law and notices of violation issued monthly by the LEA. Consequently,  
19 the mountain of refuse grew to a dangerous volume.

20       12.     Fire suppression efforts by the LAFD and the Bureau of Sanitation's removal of  
21 over 10,000 tons of refuse reduced the pile enough to suppress the smoldering blaze. However,  
22 the remaining tons of refuse continue to pose health and safety risks for the nearby food  
23 processing facilities, City and State regulators, Clean Up America employees and members of  
24 the public.

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II. THE PARTIES

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A. Plaintiff, the People

13. Plaintiff, the People of the State of California, brings this action by and through Michael N. Feuer, City Attorney for the City of Los Angeles, on behalf of the People pursuant to Business and Professions Code sections 17203, 17204, and 17206, to enjoin any person who violates, or proposes to violate, the Unfair Competition Law (Business and Professions Code sections 17200 *et seq.*, ("UCL")), and to obtain mandatory civil penalties for each act of unfair competition.

B. Individual Defendants

14. Michael John Meraz, an individual, is, and at all times relevant hereto was, a resident of Los Angeles County, conducting business in Los Angeles County and, as set forth herein, was the Chief Executive Officer and exercised direct control over the daily operations, employees, and important business decisions of Merco LLC.

C. Corporate Defendants

15. Clean Up America, Inc. is a California Corporation doing business in California. Clean Up America Inc., at all times relevant herein, operated the CDI processing facility at 2900 Lugo Street, Los Angeles California.

16. Clean Up America LLC is a California Limited Liability Company doing business in California. Clean Up America LLC, at all times relevant herein, operated at 2900 Lugo Street, Los Angeles California.

17. Defendant Merco LLC, a California Limited Liability Company doing business in California. At all times relevant herein, Merco LLC was and is the grantee and owner of the 2900 Lugo Street property.

D. Alter Egos and "Does"

18. Plaintiff is ignorant of the true names and capacities of those Defendants sued herein under section 474 of the Code of Civil Procedure as Does 1 through 50, inclusive, and therefore sues those Defendants by fictitious names. Plaintiff will timely seek to amend this Complaint and include those Doe Defendants by their true names and capacities when they are

1 ascertained. Each fictitiously named Defendant is responsible in some manner for the illegal  
2 conduct alleged herein.

3 E. Joint and Several Liability

4 19. Each of the Defendants are jointly and severally liable by act, omission, strict  
5 liability, negligence, agency, respondeat superior, alter ego, or otherwise, for the violations of  
6 law alleged herein.

7 20. At all times relevant herein, Defendants were acting as the agents, assignees,  
8 partners, joint ventures, alter egos, representatives, co-conspirators, or employee of each other,  
9 and in committing the wrongful acts and omissions alleged herein, were acting within the course  
10 and scope of that agency, assignment, partnership, joint venture, alter ego relationship,  
11 representation, scheme, conspiracy or employment.

12 21. In committing the wrongful acts and omissions alleged herein, each Defendant  
13 caused, aided, abetted, encouraged, facilitated, permitted and/or ratified the wrongful acts and/or  
14 omissions of the other Defendants.

15 22. At all times relevant hereto, Defendants together comprised an "organization of  
16 persons" within the meaning of Business and Professions Code section 17201, in that they  
17 associated together for the common purpose of engaging in a course of deceptive, unlawful,  
18 unfair and fraudulent business acts and practices alleged herein.

19 **III. JURISDICTION AND VENUE**

20 23. Venue is proper in this county pursuant to Code of Civil Procedure section 731  
21 and Business and Professions Code section 17204 in that the violations alleged in this Complaint  
22 occurred in the City of Los Angeles and the nuisance exists in the City of Los Angeles. The  
23 Court has jurisdiction pursuant to Article VI, section 10 of the California Constitution and  
24 section 393 of the California Code of Civil Procedure.

25 **IV. FACTUAL ALLEGATIONS**

26 24. On March 28, 2012, Clean Up America leased the 2900 Lugo Street Property  
27 from Merco LLC ("Merco") for use as a waste collection and recycling facility. On March 28,  
28 2013, Merco extended the term of the lease with Clean Up America to last through April 31,

1 2024. In 2014, Clean Up America submitted a facility plan and permit application to the LEA to  
 2 operate a medium volume construction and demolition and inert (CDI) debris processing facility  
 3 at the 2900 Lugo Street Property. The Local Enforcement Agency (LEA) for the State of  
 4 California's Department of Resources Recycling and Recovery (CalRecycle) issued the permit to  
 5 Clean Up America (SWIS No. 19-AR-1252). The Lugo facility was permitted to accept up to  
 6 174 tons of debris per day, and to maintain a maximum of 1,401 tons total at the facility. The  
 7 piles of debris were required to be maintained in a safe manner with piles no more than 12 feet  
 8 high. All CDI debris must was to be processed and removed from the CDI facility within 15  
 9 days of receipt. In order to lawfully use the Lugo Property as a CDI, Clean Up America, Merco,  
 10 and Meraz (collectively "Defendants") were required to obtain a Certificate of Occupancy ("C of  
 11 O") from the Los Angeles Department of Building and Safety (LADBS). While the application  
 12 and permitting process were commenced, at no time did Defendants obtain a C of O for the  
 13 property.

14 25. On April 22, 2015, LADBS issued an Order to Comply (A-3751721) to Merco  
 15 that a C of O was required for the current refuse storage and recycling use at the Lugo Property.  
 16 Merco was ordered to discontinue illegal use or occupancy. Merco has not complied with this  
 17 order.

18 26. On August 16, 2016, LADBS issued Supplemental Order to Comply (A-4145395)  
 19 to Merco that permit number 156016-10000-12039 (obtained for the use of the Lugo Property  
 20 land for the use of land for a cargo container), permit number 15020-10000-01990 (obtained for  
 21 the change of use from manufacturing to recycling), and permit number 15010-10000-02652  
 22 (obtained for the new state approved commercial coach for an accessory office) had expired  
 23 because no inspection was approved. LADBS ordered Merco to either renew the expired permits  
 24 and diligently pursue the remaining work to completion or demolish and remove the work  
 25 described and restore the property to its prior approved use. Merco has not complied with this  
 26 Order.

27 27. The LEA conducts monthly inspections of all CDI facilities. During its 2015  
 28 summer inspections of Clean Up America, the LEA observed violations of its permit. Clean Up

12/21/2016



1 America had accumulated debris over the 1,401 ton limit and was not processing the material  
2 within the 15 days required. On July 14, 2015, the LEA issued a Notice of Violation to Clean  
3 Up America for the violations.

4 28. In August 2015, Clean Up America entered into an "Action Plan" with the LEA  
5 to correct the violations. The "Action Plan" required, among other things, that Clean Up America  
6 (1) comply with the terms of the permit, (2) process all incoming CDI debris within 15 days, and  
7 (3) maintain debris in a stable manner, configured to protect public health and safety.

8 29. For months, the LEA observed violations and issued notices of violation for  
9 storing quantities of CDI debris over the amount permitted, unstable piles, and failing to process  
10 storage within 15 days, in violation of the Public Resources Code and California Code of  
11 Regulations Title 14. The violations were documented and provided to Clean Up America.  
12 Further violations were found, documented, and presented to Clean Up America in September,  
13 October, November, and December of 2015.

14 30. On December 15, 2015, an LEA inspection revealed that Clean Up America was  
15 not in compliance with the permit. There were more than 1,401 tons of material being stored on  
16 site that was not being processed within the required 15 days. Additionally, LEA inspectors  
17 observed that the piles of material were unstable. On December 22, 2015, the LEA issued a  
18 Notice and Order (No. CUA 15-01) to Clean Up America, Inc. The order required the company  
19 to:

- 20 • Process all onsite debris by January 22, 2016;
- 21 • Remove residual from the site;
- 22 • Realign the debris piles so that the angle of repose was no greater than 45  
23 degrees;
- 24 • Provide the LEA with weekly reports on the daily tonnage figures of incoming  
25 and outgoing material for the facility;
- 26 • Submit an application for a new facility permit – including an updated facility  
27 plan – by February, 2016; and
- 28 • Cease acceptance of all material if the on-site CDI debris had not been processed,

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1 until which time the facility was in full compliance with Title 14 state minimum  
2 standards.

3 31. On January 28, 2016, the LEA inspected the 2900 Lugo Street Property. Clean  
4 Up America had failed to comply with the December 2015 Notice and Order. Vast quantities of  
5 CDI debris were still unprocessed at the facility, a pile of residual waste had accumulated onsite  
6 for over the 48-hour time limit, and the angle of repose of the CDI piles was still uncorrected and  
7 continued to pose a danger to public health and safety.



18 32. On February 12, 2016, Clean Up America entered into a "Stipulated Agreement  
19 for Compliance with State Minimum Standards" with the LEA.

20 33. Clean Up America did not comply with the Stipulated Agreement. By April,  
21 2016, Clean Up America was added to the CalRecycle Inventory of Solid Waste Facilities which  
22 Fail to Meet State Minimum Standards. At that point in time, Clean Up America had 90 days to  
23 come into compliance or the LEA would revoke Clean Up America's permit.

24 34. In May and June of 2016, CalRecycle and the LEA conducted joint inspections of  
25 the Clean Up America site. They found that Clean Up America was not in compliance with any  
26 of the terms of the permit or the Stipulated Agreement. The now mountain of rubbish had not  
27 been reduced in size. At that time, it was estimated that there were 6,500 tons of material on site.  
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1 It was later discovered this was an underestimate of the tons of material at the facility.

2 35. On July 29, 2016, Clean Up America submitted a second "Action Plan" to remove  
3 the debris. During the regular August inspection, the LEA found no progress had been made in  
4 removing the debris. Clean Up America continued to be in violation of the permit and the  
5 Stipulated Agreement. Clean Up America failed to bring the site into compliance within the  
6 required 90 days.

7 36. On August 31, 2016, the LEA directed Clean Up America to stop accepting any  
8 incoming materials and to immediately remove all material at the CDI facility. The LEA advised  
9 Clean Up America that it would be issuing a Cease and Desist Order within 30 days  
10 memorializing its verbal direction as stated.

11 37. On September 12, 2016, the Los Angeles Fire Department issued a Fire/Life  
12 Safety Violation notice number 017000491. This Notice of Violation documented Clean Up  
13 America's failure to maintain all storage at least 10 feet away from all property lines and  
14 maintaining debris piles at a height greater than 20 feet.

15 38. On September 18, 2016, fire broke out in the debris pile at the Lugo property. The  
16 mountain of debris measured 250 feet x 252 feet and was over 25 feet high. The LAFD fought  
17 this initial fire on a 24-hour basis, seeming to extinguish it on September 21.

18 39. On September 22, a second fire broke out. This time, the LAFD was unable to  
19 readily extinguish the fire. The LAFD could not access the source of the fire due to the size and  
20 condition of the mountain of refuse because there were no fire lanes or access points. The LAFD  
21 began a weeks'-long, 24-hour per day operation to fight the fire, involving multiple engine  
22 companies applying constant water to the pile.

23 40. On September 22, 2016, the LAFD issued a Fire / Life Safety Violation notice to  
24 Clean Up America, including violations regarding the height and dimensions of the debris pile  
25 and the lack of ingress and egress.

26 41. On September 30, 2016, the Department of Public Works, Bureau of Sanitation's  
27 Watershed Division issued a Notice of Violation (A1052069) to Defendants Clean Up America  
28 and Michael Meraz. The Notice detailed Defendant Clean Up America's failure to capture the

1 polluted wastewater flowing out of the debris pile due to the constant application of water to the  
2 fire by the LAFD.

3 42. On October 3, 2016, LAFD officials met with Clean Up America and discussed  
4 heavy equipment requirements necessary to tear apart the debris piles, extinguish the fire, and  
5 remove the debris. Clean Up America agreed to provide equipment.

6 43. Later on October 3, 2016, Clean Up America notified the LAFD that it would be  
7 unable to provide heavy equipment to assist LAFD's efforts to extinguish the fire.

8 44. The City of Los Angeles arranged for the removal of the debris. On October 10,  
9 2016, LASAN began removing the debris. In the first week, LASAN removed 900 tons of  
10 material from the site. LASAN arranged for additional trucks to remove debris at a faster pace.  
11 In the following weeks LASAN removed an additional 7,476 tons of material. As of November  
12 2, 2016, LASAN has removed more than 10,000 tons of material from the Lugo property.

13 45. On October 17, 2016, the LEA issued a Cease and Desist Order to Clean Up  
14 America ordering Clean Up America to immediately (a) stop accepting incoming CDI material,  
15 (b) remove all CDI material from the facility, and (c) correct all violations of the Public  
16 Resources Code and Title 14 as previously noted.

17 46. On November 18, 2016, the Bureau of Public Works revoked Clean Up  
18 America's waste hauler permit. Clean Up America was given a 30 day transition period as a  
19 courtesy for its customers. As of December 19, 2016, Clean Up America no longer had a valid  
20 waste hauler permit and cannot lawfully haul waste generated at a location within the City of Los  
21 Angeles.

22 47. On December 6, 2016, Deontay Potter, owner of Clean Up America, and property  
23 owner Michael Meraz met with the LEA regarding a cleanup plan for the facility. Clean Up  
24 America and Meraz agreed to provide a cleanup plan to the LEA by December 12, 2016.

25 48. Despite the order to immediately stop accepting any additional materials, Clean  
26 Up America continued to bring CDI debris to the facility after October 17, 2016. Materials were  
27 observed being brought onto the site as late as the week of December 19, 2016.

**FIRST CAUSE OF ACTION**

**(California Business and Professions Code section 17200 *et seq.*)  
(Against All Defendants and DOES 1 through 50)**

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3 49. Plaintiff alleges and incorporates herein by reference paragraphs 1-48 of this  
4 Complaint.

5 50. Since at least August, 2015, Defendants and DOES 1-50, and each of them, have  
6 violated the Unfair Competition Law (UCL) on a daily basis by engaging in one or more  
7 *unlawful* business acts and practices as follows:

8 **A. Violations of the Public Resources Code:**

9 i. Section 44014(b): Failed to comply with all terms and conditions of their  
10 solid waste facility permit (violated daily since August 27, 2015);

11 **B. Violations of the California Code of Regulations:**

12 i. Section 18223(a): Failed to submit amendments to Registration Permit  
13 Facility Plan on a timely basis (daily since August 27, 2015);

14 ii. Section 17383.5(b): Failed to process all incoming construction and  
15 demolition and inert (CDI) debris within 15 days (daily since August 27,  
16 2015);

17 iii. Section 17383.5(d): Stored debris on site that exceeds maximum approved  
18 amount (1,401 tons) (daily since August 27, 2015);

19 iv. Section 17383.5(i): Failed to maintain debris piles in a stable  
20 configuration (daily since August 27, 2015);

21 v. Section 17383.5(k): Exceeded Section 17383.5 limitations three or more  
22 times within a two-year period ("three strikes") and therefore no longer  
23 qualified for a Registration Permit from the LEA (daily violation since  
24 August 31, 2016);

25 vi. Section 17410.4: Failed to take adequate steps to control propagation,  
26 harborage, and attraction of rodents (rats) (daily since September 17,  
27 2015);  
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vii. Section 17414: Failed to comply with record keeping requirements (daily since June 24, 2016); and

viii. Section 17416.3: Failed to maintain adequate equipment to comply with processing requirements under Permit (daily since June 24, 2016).

**C. Violations of the Los Angeles Municipal Code:**

ix. Sections 12.26E.1(a), 12.21A.1(a): Failed to obtain a Certificate of Occupancy as required for refuse storage and recycling center, a permit is required for the change of use (daily since April 21, 2015);

x. Sections 12.26E.2, 12.21A.1(a): Failed to obtain a Certificate of Occupancy as required for refuse storage and recycling center, current use is manufacturing (daily since April 21, 2015);

xi. Section 57.315.4: Failed to comply with the requirement storage must be at least 10 feet away from all property lines (daily since September 12, 2016);

xii. Section 57.315.4.2: Failed to comply with the requirement the height of outside storage must not exceed 20 feet (daily since September 12, 2016);

xiii. Section 57.2808.3: Failed to comply with the requirement piles must not exceed 25 feet in height, 150 feet in width and 250 feet in length (daily since September 22, 2016);

xiv. Section 57.2808.4: Failed to maintain a separation from adjacent piles by an approved fire apparatus access road of 20 feet (daily since September 22, 2016);

xv. Section 57.315.3.11: Failed to keep aisles and entrances free of storage and equipment not being handled or operated (daily since September 22, 2016);

xvi. Section 57.315.3.6: Failed to provide an unobstructed Main Aisle way of egress at least 10 feet in width for any storage pile over 50 feet in length (daily since September 22, 2016);

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- xvii. Sections 57.505.1 – 57.505.1.2: Failed to provide and maintain street numbers for all occupancies on premises in a location visible from the street, with minimum size of four inches high by two inches wide (daily since September 22, 2016);
- xviii. Section 57.2803.8: Failed to comply with the requirement that recycling material shall not be stored within 10 feet of any building on adjacent property or within 15 feet of an unprotected opening in any building (daily since September 22, 2016);
- xix. Section 64.70.02.A(3): Discharged waste water containing pollutants as defined by the Clean Water Act and LAMC 64.70/(3) (pollutant that injures or poses hazard to human, animal, plant, or fish or creates public nuisance) (daily since September 30, 2016);
- xx. Section 64.70.02.B(2): Discharged waste water containing pollutants as defined by the Clean Water Act and LAMC 64.70/(2) (untreated runoff containing grease, oil, etc. from machinery, equipment, tools, motor vehicles, or hazardous substance) (daily since September 30, 2016);
- xxi. Section 64.70.02.D(1): Discharged waste water containing pollutants as defined by the Clean Water Act and LAMC 64.70 from failure to implement structural controls / (1) failure to implement appropriate best management practices (daily since September 30, 2016);
- xxii. Section 64.70.02.D: Discharged waste water containing pollutants as defined by the Clean Water Act and LAMC 64.70 from failure to establish and/or implement spill prevention and response procedures / failure to implement appropriate best management practices (daily since September 30, 2016);
- xxiii. Section 64.70.02.D: Discharged waste water containing pollutants as defined by the Clean Water Act and LAMC 64.70 from failure to divert storm water with ditches, swales or berms around storage areas / failure to

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implement appropriate best management practices (daily since September 30, 2016);

xxiv. Sections 91.109.1, 91.103.1, 12.21A.1(a): Failed to first obtain the required Certificate of Occupancy before occupying the blasting building (daily since August 22, 2016);

xxv. Sections 91.106.4.4.3, 91.5R106.4.4.3, 98.0602(a), 98.0602(b): Operated without a valid permit, as permit 15016-10000-12039 expired (daily since August 22, 2016);

xxvi. Sections 91.106.4.4.3, 91.5R106.4.4.3, 98.0602(a), 98.0602(b): Operated without a valid permit, as permit 15020-10000-01990 expired (daily since August 22, 2016); and

xxvii. Sections 91.106.4.4.3, 91.5R106.4.4.3, 98.0602(a), 98.0602(b): Operated without a valid permit, as permit 15010-10000-02652 expired (daily since August 22, 2016).

**D. Violations of the Civil Code sections 3479 and 3480 – Public Nuisance:**

xxviii. The fire and general situation at the 2900 Lugo Street Property constitute a nuisance pursuant to Section 3479 in that it is injurious to health, offensive to the senses, and obstructs the free use of property. The nuisance at the 2900 Lugo Street Property is a public nuisance pursuant to Section 3480 in that it affects the entire neighborhood and a considerable number of persons.

**SECOND CAUSE OF ACTION**  
**(Civil Code Section 3479 *et seq.*)**  
**(Against All Defendants and DOES 1 through 50)**

51. Plaintiff alleges and incorporates herein by reference paragraphs 1-50 of this Complaint.

52. The fire and general situation at the 2900 Lugo Street Property constitute a



1 nuisance pursuant to Section 3479 in that it is injurious to health, offensive to the senses, and  
2 obstructs the free use of property.

3 53. The nuisance at the 2900 Lugo Street Property is a public nuisance pursuant to  
4 Section 3480 in that it affects the entire neighborhood and a considerable number of persons.

5 **PRAYER FOR RELIEF**

6 **WHEREFORE**, the People pray for judgment as follows:

7 1. Pursuant to Business and Professions Code section 17203, that Defendants, their  
8 successors, agents, representatives, employees and all persons who act in concert with them, and  
9 Does 1 through 50, shall be permanently enjoined from engaging in unfair competition as  
10 defined in Business and Professions Code section 17200 *et seq.*, including, but not limited to, the  
11 acts and practices alleged in this complaint.

12 2. Pursuant to Business and Professions Code section 17206, that this Court assess  
13 civil penalties in an amount according to proof for each daily violation of Business and  
14 Professions Code section 17200 *et seq.* that they committed.

15 3. That Defendants be ordered to make direct restitution of any money or other  
16 property which may have been acquired by their violations of Business and Professions Code  
17 section 17200 *et seq.*

18 4. Pursuant to Business and Professions Code sections 17203 and 17204, Defendants  
19 be ordered to restore to all persons not previously restored any money or property they acquired  
20 by means of the unlawful, unfair, and fraudulent business acts and practices in this Complaint.

21 6. That the 2900 Lugo Street Property, together with the fixtures and moveable  
22 property therein and thereon, be declared a public nuisance and be permanently abated as such in  
23 accordance with Civil Code sections 3479 and 3480.

24 7. That the Court find that Defendants, DOES 1 through 50, and their agents, heirs,  
25 successors, officers, employees and anyone acting on their behalf have owned, operated,  
26 maintained, and managed the 2900 Lugo Street Property in a manner that is a public nuisance.

27 8. That the Court grant a permanent injunction, and order of abatement in  
28 accordance with Civil Code section 3491, enjoining and restraining Defendants, DOES 1 through

1 50, and their agents, heirs, successors, officers, employees and anyone acting on their behalf  
2 from owning, operating, maintaining, and managing the 2900 Lugo Street Property as a public  
3 nuisance.

4 9. That Defendants, DOES 1 through 50, and their agents, heirs, successors, officers,  
5 employees and anyone acting on their behalf be ordered to maintain the 2900 Lugo Street  
6 Property in a safe and sanitary condition.

7 10. That Defendants, DOES 1 through 50, and their agents, heirs, successors,  
8 officers, employees and anyone acting on their behalf be required to stay 100 feet away from the  
9 2900 Lugo Street Property while the Receiver is in control of the Property.

10 11. That Plaintiff the PEOPLE recover the costs of suit.

11 12. That Plaintiff the PEOPLE recover outstanding costs and administrative fees.

12 13. That Plaintiff the PEOPLE obtain reimbursement of all costs of all City and State  
13 agencies, for addressing the violations at the 2900 Lugo Street Property.

14 14. That Plaintiff the PEOPLE obtain reimbursement of all costs of investigation by  
15 all City and State agencies.

16 15. That Plaintiff the PEOPLE be granted such other and further relief as the Court  
17 may deem to be just and proper.

18

19 Dated: December 21, 2016

20

Respectfully submitted,

21

MICHAEL N. FEUER, City Attorney  
TINA HESS, Supervising Assistant City Attorney  
JESSICA B. BROWN, Supervising Deputy City Attorney  
JULIANN ANDERSON, Deputy City Attorney  
SUZANNE V. SPILLANE, Deputy City Attorney  
OFFICE OF THE LOS ANGELES CITY ATTORNEY  
CRIMINAL and SPECIAL LITIGATION BRANCH

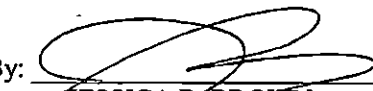
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By:   
JESSICA B. BROWN  
Attorneys for Plaintiff,  
The People of the State of California

27

28

CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
Jessica B. Brown, Sup. Deputy City Atty. (SBN211642)  
Office of the Los Angeles City Attorney  
200 N. Main Street, 500 City Hall East  
Los Angeles, CA 90012

TELEPHONE NO.: (213) 978-8091 FAX NO.: (213) 978-8112  
ATTORNEY FOR (Name): Plaintiff

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES  
STREET ADDRESS: 111 N. Hill Street  
MAILING ADDRESS: 111 N. Hill Street  
CITY AND ZIP CODE: Los Angeles, 90012  
BRANCH NAME: Central

CASE NAME: People v. CLEAN UP AMERICA, Inc., et al.

FOR COURT USE ONLY

**FILED**  
Superior Court Of California  
County Of Los Angeles

DEC 21 2016

Sherri R. Carter, Executive Officer/Clerk  
By Charlie L. Coleman Deputy  
Charlie L. Coleman

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

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

CASE NUMBER: **BC 6 4 4 4 2 0**

JUDGE:

DEPT:

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

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

**Auto Tort**

- Auto (22)
- Uninsured motorist (46)

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

- Asbestos (04)
- Product liability (24)
- Medical malpractice (45)
- Other PI/PD/WD (23)

**Non-PI/PD/WD (Other) Tort**

- Business tort/unfair business practice (07)
- Civil rights (08)
- Defamation (13)
- Fraud (16)
- Intellectual property (19)
- Professional negligence (25)
- Other non-PI/PD/WD tort (35)

**Employment**

- Wrongful termination (36)
- Other employment (15)

**Contract**

- Breach of contract/warranty (06)
- Rule 3.740 collections (09)
- Other collections (09)
- Insurance coverage (18)
- Other contract (37)

**Real Property**

- Eminent domain/inverse condemnation (14)
- Wrongful eviction (33)
- Other real property (26)

**Unlawful Detainer**

- Commercial (31)
- Residential (32)
- Drugs (38)

**Judicial Review**

- Asset forfeiture (05)
- Petition re: arbitration award (11)
- Writ of mandate (02)
- Other judicial review (39)

**Provisionally Complex Civil Litigation**  
(Cal. Rules of Court, rules 3.400-3.403)

- Antitrust/Trade regulation (03)
- Construction defect (10)
- Mass tort (40)
- Securities litigation (28)
- Environmental/Toxic tort (30)
- Insurance coverage claims arising from the above listed provisionally complex case types (41)

**Enforcement of Judgment**

- Enforcement of judgment (20)

**Miscellaneous Civil Complaint**

- RICO (27)
- Other complaint (not specified above) (42)

**Miscellaneous Civil Petition**

- Partnership and corporate governance (21)
- Other petition (not specified above) (43)

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- a.  Large number of separately represented parties
- b.  Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
- c.  Substantial amount of documentary evidence
- d.  Large number of witnesses
- e.  Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
- f.  Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive

4. Number of causes of action (specify): Two

5. This case  is  is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: December 21, 2016

Jessica B. Brown, Sup. Deputy City Atty.

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

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

Page 1 of 2

ORIGINAL

## INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

CM-010

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

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

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

## CASE TYPES AND EXAMPLES

## Auto Tort

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

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

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

## Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)  
Civil Rights (e.g., discrimination, false arrest) (not civil harassment) (08)  
Defamation (e.g., slander, libel) (13)  
Fraud (16)  
Intellectual Property (19)  
Professional Negligence (25)  
Legal Malpractice  
Other Professional Malpractice (not medical or legal)  
Other Non-PI/PD/WD Tort (35)  
Employment  
Wrongful Termination (36)  
Other Employment (15)

## Contract

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

## Real Property

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

## Unlawful Detainer

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

## Judicial Review

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

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

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

## Enforcement of Judgment

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

## Miscellaneous Civil Complaint

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

## Miscellaneous Civil Petition

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

SHORT TITLE: People v. CLEAN UP AMERICA, Inc., et al.	CASE NUMBER: BC 6 4 4 4 2 0
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**CIVIL CASE COVER SHEET ADDENDUM AND  
STATEMENT OF LOCATION  
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

**Step 1:** After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

**Step 2:** In Column B, check the box for the type of action that best describes the nature of the case.

**Step 3:** In Column C, circle the number which explains the reason for the court filing location you have chosen.

**Applicable Reasons for Choosing Court Filing Location (Column C)**

- |  |  |
|--|--|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, Central District. | 7. Location where petitioner resides.  |
| 2. Permissive filing in central district.  | 8. Location wherein defendant/respondent functions wholly.   |
| 3. Location where cause of action arose.   | 9. Location where one or more of the parties reside.   |
| 4. Mandatory personal injury filing in North District.                           | 10. Location of Labor Commissioner Office.   |
| 5. Location where performance required or defendant resides.                     | 11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury). |
| 6. Location of property or permanently garaged vehicle.                          |  |

**ORIGINAL**

Auto Tort

Other Personal Injury/Property Damage/Wrongful Death Tort

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1, 4, 11
Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage	1, 11
	<input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11
Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1, 4, 11
	<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11
Other Personal Injury/Property Damage/Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1, 4, 11
	<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1, 4, 11
	<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1, 4, 11
	<input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11

SHORT TITLE: People v. CLEAN UP AMERICA, Inc., et al.

CASE NUMBER

JAMICIA

Non-Personal Injury/Property Damage/Wrongful Death Tort  
Employment  
Contract  
Real Property  
Unlawful Detainer

A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Business Tort (07)	<input checked="" type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1, 2, 3
Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice	1, 2, 3
	<input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3
Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case	1, 2, 3
	<input type="checkbox"/> A6109 Labor Commissioner Appeals	10
Breach of Contract/Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction)	2, 5
	<input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence)	2, 5
	<input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud)	1, 2, 5
	<input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	1, 2, 5
Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff	5, 6, 11
	<input type="checkbox"/> A6012 Other Promissory Note/Collections Case	5, 11
	<input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11
Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8
Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud	1, 2, 3, 5
	<input type="checkbox"/> A6031 Tortious Interference	1, 2, 3, 5
	<input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 8, 9
Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation      Number of parcels _____	2, 6
Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure	2, 6
	<input type="checkbox"/> A6032 Quiet Title	2, 6
	<input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6
Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
Unlawful Detainer-Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

SHORT TITLE: <b>People v. CLEAN UP AMERICA, Inc., et al.</b>	CASE NUMBER
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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
<b>Judicial Review</b>	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus	2, 8
		<input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter	2
		<input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2
Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2, 8	
<b>Provisionally Complex Litigation</b>	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1, 2, 8
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1, 2, 3
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1, 2, 8
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1, 2, 8
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1, 2, 3, 8
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
<b>Enforcement of Judgment</b>	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment	2, 5, 11
		<input type="checkbox"/> A6160 Abstract of Judgment	2, 6
		<input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations)	2, 9
		<input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes)	2, 8
		<input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax	2, 8
		<input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2, 8, 9
<b>Miscellaneous Civil Complaints</b>	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1, 2, 8
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only	1, 2, 8
		<input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment)	2, 8
		<input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex)	1, 2, 8
<input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1, 2, 8		
<b>Miscellaneous Civil Petitions</b>	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2, 8
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment	2, 3, 9
		<input type="checkbox"/> A6123 Workplace Harassment	2, 3, 9
		<input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case	2, 3, 9
		<input type="checkbox"/> A6190 Election Contest	2
		<input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender	2, 7
		<input type="checkbox"/> A6170 Petition for Relief from Late Claim Law	2, 3, 8
<input type="checkbox"/> A6100 Other Civil Petition	2, 9		

SHORT TITLE: People v. CLEAN UP AMERICA, Inc., et al.	CASE NUMBER
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**Step 4: Statement of Reason and Address:** Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input checked="" type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11.		ADDRESS: 2900 East Lugo Street
CITY: Los Angeles	STATE: CA	ZIP CODE: 90023

12/21/2016

**Step 5: Certification of Assignment:** I certify that this case is properly filed in the Central District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: December 10, 2016



(SIGNATURE OF ATTORNEY/FILING PARTY)  
JESSICA B. BROWN

Supervising Deputy City Attorney

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

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.