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FILED

Superior Court of California
County of Los Angeles

MAY 26 2017

Sherri R. Carver, Executive Officer/Clerk

By *SB* Deputy
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**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

COUNTY OF LOS ANGELES,

Case No.: **BC 663041**

Plaintiff,

**COMPLAINT FOR FRAUD AND DECEIT AND
NEGLIGENT MISREPRESENTATION**

vs.

VASQUEZ & COMPANY, LLP and DOES
1-15, inclusive,

Defendants.

53283778v1

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COMPLAINT FOR FRAUD AND DECEIT AND NEGLIGENT MISREPRESENTATION

The County of Los Angeles alleges as follows:

PARTIES

1. Plaintiff County of Los Angeles ("County") is a duly organized and existing political subdivision of the State of California and a charter county with the State of California.

2. The County is informed and believes, and thereon alleges, that at all times relevant to this action, defendant Vasquez & Company, LLP ("Vasquez, LLP") purported, and purports, to be a limited liability partnership, and a licensed certified public accounting firm with its principal place of business in the County of Los Angeles, State of California.

3. Plaintiff County is ignorant of the true names and capacities of defendants sued herein as Does 1 through 15, inclusive, and, therefore sues these defendants by such fictitious names. Plaintiff County will amend this complaint to allege their true names and capacities when ascertained. Plaintiff County is informed and believes and thereon alleges that each of the fictitiously named defendants is responsible in some manner for the occurrences herein alleged, and that defendants proximately caused plaintiff County damages alleged in this complaint.

4. Plaintiff County is informed and believes, and thereon alleges, that at all times relevant to this action, each of the defendants was the agent, employee and servant of each of the other defendants, acting within the course and scope of such agency, employment and service.

5. Plaintiff County is informed and believes, and thereon alleges, that each of the defendants knowingly and willfully conspired and agreed among themselves to engage in the acts, omission and conduct set forth herein. Each of those acts were performed and conducted in furtherance of the conspiracy.

FACTS

6. Between 2000 and 2013, plaintiff County contracted with CSAC, a 501(c)(3) non-profit corporation, to provide various public and social services to eligible

County clients ("Contract"). County, State of California and federal monies ("public monies") funded payments to CSAC under the contract. During the fiscal years ending June 30, 2010 through June 30, 2012, the last three full years that the County contracted with CSAC, the County paid CSAC almost \$9 million. The Contract required CSAC to provide to the County on an annual basis audited financial statements and so-called "Single Audits" as a result of the involvement of federal funds. During the County's funding of CSAC, Vasquez, LLP was a purported "independent auditor" that performed these audits which the County relied upon to ensure that CSAC's representations concerning its financial and programmatic activities were free from material misstatements.

7. In 2011, the County's Office of Investigations and the County's District Attorney's Office commenced a criminal investigation of CSAC. This investigation found that CSAC executives fraudulently billed the County approximately \$9 million during fiscal years 2007-08 through 2011-12. On June 15, 2015, the County's District Attorney's Office filed criminal charges against three officers of CSAC. That felony case is *People v. Esparza*, Superior Court of the State of California, County of Los Angeles, Case No. BA437059. The criminal complaint contains 41 counts.

8. In 2015, the County's Office of Investigations commenced an inquiry into Vasquez, LLP and possible conflicts of interest. That investigation concluded in and around August 2015, at which time the County determined that Vasquez, LLP issued audit reports for the fiscal years 2009-10, 2010-11 and 2011-12 ("Reports") that failed to address serious issues and defalcations of CSAC. These include the following:

(a) CSAC improperly paid approximately \$8,500 in public monies for a yacht trip for Gilbert Vasquez, the managing partner of Vasquez, LLP. Although checks reflecting this payment were in Vasquez, LLP's work papers, defendants did not question the propriety of this payment and use of public monies.

(b) The payment for the yacht trip also brought, and brings, into question the independence of defendants' ability to audit CSAC.

(c) Defendants knew that CSAC, using public monies, paid rent for

1 two personal residences of Sophia Esparza, the then president and chief executive officer of
2 CSAC. Even though defendants knew that a substantial portion (at least 50% to 60%) of the
3 rent was for Ms. Esparza's personal use, defendants permitted the rental payments to be
4 recorded as an expense of CSAC. Defendants never obtained copies of the rental
5 agreements or any substantiation that CSAC's board approved of these personal payments
6 of public monies.

7 (d) For fiscal year 2007-08, Vasquez, LLP were aware of \$35,000 in
8 "miscellaneous expenses," which CSAC paid with public monies, and noted that these
9 reflected credit card expenses used by the chief executive officer and that no source
10 documents were available. Defendants did not attempt to obtain an explanation of these
11 expenses.

12 (e) Defendants were aware that for CSAC's fiscal year 2010-11,
13 CSAC purchased, using public monies, a new 2009 Jaguar XF for \$65,000 in 2008-09, and a
14 new 2010 Jaguar XK convertible for \$85,000 in 2010-11. CSAC claimed that the 2010
15 Jaguar was bought to replace the 2009 Jaguar which had allegedly been stolen. However,
16 CSAC was unable to provide any police report of such theft and later told defendants that
17 CSAC later "found" the automobile. Defendants made no further inquiry into the "story" of the
18 allegedly "stolen" vehicle and did not highlight these purchases in any audit so that one could
19 determine the propriety of a public service organization purchasing luxury vehicles for private
20 use with public monies.

21 (f) For the 2009-10 and 2010-11 fiscal years, defendant knew that
22 CSAC, using public monies, paid for lobbying expenses that were not properly accounted for
23 in CSAC's tax return for those years. Yet, defendants failed to submit to CSAC amended
24 returns to file to account for these expenses. Additionally, while CSAC had lobbying
25 expenses for fiscal year ending 2012 and defendants were aware of these expenses,
26 defendants failed to ensure that the expenses were included in CSAC's return for that year.

27 (g) Defendants obtained so-called fraud questionnaires from
28 Vasquez, LLP staff members and accountants. The questionnaires were cursory in nature

1 and did not contain thorough, satisfactory answers. Defendants did not follow up on the
2 inadequate responses. The failure reflects that defendants failed in their obligation to
3 conduct due diligence with respect to their audits.

4 (h) From time to time Vasquez, LLP issued management letters to
5 CSAC requesting further information and documentation. The files of Vasquez, LLP revealed
6 no responses to such letters and a failure of defendants to follow up for responses. This was
7 true with respect to payment of rent for personal use and for payment of life insurance for
8 CSAC's chief executive officer and chief financial officer. It was also true with respect to
9 concerns about CSAC board meeting minutes.

10 (i) When questioned why certain of Vasquez, LLP's negative findings
11 were not included in final audit reports, Gilbert Vasquez, on behalf of Vasquez, LLP, stated
12 that defendants would simply accept Ms. Esparza's explanations at face value and not test
13 the veracity of the explanations with any further inquiry.

14 9. The conduct of defendants, and each of them, violated, inter alia,
15 standard AU § 240 (SAS 122 and 128) of the American Institute of Certified Public
16 Accountants

17 10. Defendants, and each of them, were aware that plaintiff County was
18 relying upon their audit work and purported independence to provide accurate reports on the
19 financial condition and operations of CSAC so as to enable the County to ensure that public
20 monies were properly being used. Despite that knowledge, defendants Vasquez, LLP and
21 Does 1 through 15, inclusive, submitted Reports to the County knowing that the information
22 contained therein was false, misleading and omitted material facts.

23 **FIRST CAUSE OF ACTION**

24 **(For Fraud And Deceit Against Defendants Vasquez, LLP And Does 1 Through 15,**
25 **Inclusive)**

26 11. Plaintiff County refers to paragraphs 1 through 10, above, and
27 incorporates them herein by this reference.

28 12. The Reports which defendants Vasquez, LLP and Does 1 through 15,

1 inclusive, and each of them, provided to plaintiff County were in fact false. The true facts are
2 described above.

3 13. When defendants made the Reports, defendants, and each of them
4 knew them to be false or had no belief in their truth and made them recklessly. Defendants
5 made the Reports with the intent to defraud and deceive plaintiff County whom defendants
6 intended or reasonably should have foreseen would rely on the Reports. Defendant made
7 the Reports with the intent to induce plaintiff County to act to fund CSAC.

8 14. At the time the defendants made the Reports, and at the time plaintiff
9 County funded CSAC, plaintiff County was ignorant of the falsity of the defendants' Reports
10 and believed them to be true. In reliance on these Reports, plaintiff County was induced to,
11 and did, fund CSAC. Plaintiff County's reliance on defendants' Reports was justified in that it
12 had no reason to believe the Reports were not accurate.

13 15. As a proximate result of the conduct of defendants Vasquez, LLP and
14 Does 1 through 15, inclusive, and each of them, and the facts alleged herein, plaintiff County
15 was damaged in a sum in excess of \$9 million, according to proof at trial.

16 16. In engaging in the conduct alleged herein, defendants Vasquez, LLP and
17 Does 1 through 15, inclusive, and each of them, acted with oppression, fraud and malice. As
18 a result, plaintiff County is entitled to exemplary damages.

19 **SECOND CAUSE OF ACTION**

20 **(For Negligent Misrepresentation Against Defendants Vasquez, LLP And Does 1**
21 **Through 15, Inclusive)**

22 17. Plaintiff County refers to paragraphs 1 through 10, above, and
23 incorporates them herein by this reference.

24 18. Defendants Vasquez, LLP and Does 1 through 15, inclusive, provided
25 the Reports with no reasonable ground for believing them to be true in that each of
26 defendants knew that they omitted relevant information, contained factual inaccuracies and
27 were misleading.

28 19. Each of the defendants provided the Reports with the intent to induce

1 plaintiff County to act in reliance on the Reports and to be influenced in continued funding of
2 CSAC, which defendants, and each of them, intended to influence, in that defendants knew
3 with substantial certainty that plaintiff County would rely on the Reports in the course of
4 funding transactions of CSAC.

5 20. At the time the defendants made the Reports, and at the time plaintiff
6 County funded CSAC, plaintiff County was ignorant of the falsity of the defendants' Reports
7 and believed them to be true. In reliance on these Reports, plaintiff County was induced to,
8 and did, fund CSAC. Plaintiff County's reliance on defendants' Reports was justified in that it
9 had no reason to believe the Reports were not accurate.

10 21. As a proximate result of the conduct of defendants Vasquez, LLP and
11 Does 1 through 15, inclusive, and each of them, and the facts alleged herein, plaintiff County
12 was damaged in a sum in excess of \$9 million, according to proof at trial.

13 **PRAYER**

14 WHEREFORE, plaintiff County of Los Angeles prays judgment against
15 defendants Vasquez, LLP and Does 1 through 15, inclusive, and each of them, as follows:

- 16 1. On the first cause or action for negligent misrepresentation,
17 (a) for the sum of at least \$9 million, according to proof at trial; and
18 (b) for pre and post judgment interest as provided by law;
19 2. On the Second Cause of Action for fraud,
20 (a) for the sum of at least \$9 million, according to proof at trial;
21 (b) for pre and post judgment interest as provided by law; and
22 (c) exemplary damages;

23 ///

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1 3. On each cause of action, for such other and further relief as may be
2 reasonable and proper.

3 DATED: MAY 26, 2017

MARY C. WICKHAM, County Counsel
JUDY W. WHITEHURST, Assistant County Counsel
MICHAEL S. BUENNAGEL, Deputy County Counsel

4 NOSSAMAN LLP
5 LLOYD W. PELLMAN
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7 JENNIFER L. MEEKER

8
9 By: 
10

STEPHEN P. WIMAN

11 Attorneys for Plaintiff COUNTY OF LOS ANGELES
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FOR COURT USE ONLY

FILEDSuperior Court of California
County of Los Angeles

MAY 26 2017

Sherri R. Carter, Executive Officer/Clerk

By Shamya Golden Deputy

COURTNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number, and address):

Stephen P. Wiman (SBN: 54825)

NOSSAMAN LLP

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ATTORNEY FOR (Name): Plaintiff COUNTY OF LOS ANGELES

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

STREET ADDRESS: 111 North Hill Street

MAILING ADDRESS: same

CITY AND ZIP CODE: Los Angeles, CA 90012

BRANCH NAME: Central District

CASE NAME: COUNTY OF LOS ANGELES v. VASQUEZ & COMPANY, LLP and
DOES 1-15, inclusive**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 663041**

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

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

4. Number of causes of action (specify): Two - 1) Fraud and Deceit and 2) Negligent Misrepresentation

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: May 26, 2017

Stephen P. Wiman

(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

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

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 P/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 P/PI/PD/WD

Non-P/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-P/PI/PD/WD Tort (35)

Employment

Wrongful Termination (36) Other
Employment (15)

Contract

Breach of Contract/Warranty (05)
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: COUNTY OF LOS ANGELES vs. VASQUEZ & COMPANY, LLP
and DOES 1-15, inclusive

CASE NUMBER

DC 663041

**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. | |

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 <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11 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 <input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11 1, 4, 11
Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall) <input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.) <input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress <input type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11 1, 4, 11 1, 4, 11 1, 4, 11

LACV 109 (Rev 2/16)

LASC Approved 03-04

53401277.v1

**CIVIL CASE COVER SHEET ADDENDUM
AND STATEMENT OF LOCATION**

Local Rule 2.3

Page 1 of 4

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SHORT TITLE: COUNTY OF LOS ANGELES vs. VASQUEZ & COMPANY, LLP
and DOES 1-15, inclusive

CASE NUMBER

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
	Fraud (16)	<input checked="" 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	
Employment	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
Contract	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	
Real Property	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	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

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SHORT TITLE: COUNTY OF LOS ANGELES VS. VASQUEZ & COMPANY, LLP
and DOES 1-15, inclusive

CASE NUMBER

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

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SHORT TITLE:
 COUNTY OF LOS ANGELES vs. VASQUEZ & COMPANY, LLP and DOES
 1-15, inclusive


CASE NUMBER

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: 648 Kenneth Hahn Hall of Administration 500 West Temple Street
CITY: Los Angeles	STATE: CA	ZIP CODE: 90012

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: May 26, 2017


 (SIGNATURE OF ATTORNEY/FILING PARTY)
 Stephen P. Wiman

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.

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