

MAR 15 2022

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9 SUPERIOR COURT OF CALIFORNIA
10 IN AND FOR THE COUNTY OF VENTURA

11 LIINDA PARKS,

12 Plaintiff,

13 vs.

14 RAIN PARADE, LLC, dba, DICK AT
15 YOUR DOOR; ADAM HASCALL; BRYAN
16 PRITZ, and DOES 1 through 30, inclusive,

17 Defendants.

Case No.

COMPLAINT FOR DAMAGES

INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS

18 Comes now Plaintiff LINDA PARKS, who alleges as follows:

19 1) Plaintiff is now and at all relevant times referenced herein was a resident of
20 Ventura County, California.

21 2) Defendant RAIN PARADE, LLC, dba, DICK AT YOUR DOOR, is a Limited
22 Liability company with its principal place of business in San Diego County, California.

23 3) Defendants ADAM HASCALL and BRYAN PRITZ, are now and at all times
24 mentioned in this complaint were residents of San Diego County, California.

25 4) Defendants ADAM HASCALL and BRYAN PRITZ, are now and at all times
26 mentioned in this complaint were the sole and dominating members of Defendant RAIN
27 PARADE, LLC.

28 5) On or about June 5, 2021, Defendants and each of them caused to be delivered

1 to Plaintiff's home in Ventura County a "chocolate Dick," an offensive 5 inch chocolate
2 phallus with no redeeming social qualities, whatsoever.

3 6) Defendants, and each of them, have continued their offensive and outrageous
4 conduct by, despite their public statements of disclosure of persons contracting for sending
5 their sick "novelties," failing and refusing to disclose the person(s) ultimately responsible
6 for the offensive and outrageous conduct alleged herein.

7 7) Plaintiff is informed and believes, and on that information and belief alleges,
8 that Defendant RAIN PARADE, LLC, dba, DICK AT YOUR DOOR is insolvent and is
9 unable to answer in damages to this Complaint.

10 8) Defendants ADAM HASCALL and BRYAN PRITZ are liable for the acts of
11 Defendant RAIN PARADE, LLC, dba, DICK AT YOUR DOOR alleged in this complaint
12 as their alter egos. Recognition of the privilege of separate existence would promote
13 injustice because Defendants ADAM HASCALL and BRYAN PRITZ, in bad faith
14 dominated and controlled Defendant RAIN PARADE, LLC, dba, DICK AT YOUR DOOR,
15 by using the gossamer cover of the LLC to inflict their offensive and outrageous conduct on
16 Plaintiff.

17 Plaintiff is further informed and believes, and on that information and belief alleges:

18 a. Defendants ADAM HASCALL and BRYAN PRITZ diverted funds and other
19 assets of Defendant RAIN PARADE, LLC, dba, DICK AT YOUR DOOR to other than the
20 Company's uses.

21 b. Defendants ADAM HASCALL and BRYAN PRITZ commingled funds and
22 other assets of Defendant RAIN PARADE, LLC, dba, DICK AT YOUR DOOR and their
23 funds and other assets for their own convenience and to assist in evading payment of its
24 obligations.

25 c. Defendants ADAM HASCALL and BRYAN PRITZ treated the funds and
26 other assets of Defendant RAIN PARADE, LLC, dba, DICK AT YOUR DOOR as their
27 own.

28 d. Defendants ADAM HASCALL and BRYAN PRITZ used Defendant RAIN

1 PARADE, LLC, dba, DICK AT YOUR DOOR as a mere shell, instrumentality, or conduit
2 for their sick personal thrills, utilizing false return addresses to further deceive creditors.

3 e. Defendants ADAM HASCALL and BRYAN PRITZ diverted funds and other
4 assets of Defendant RAIN PARADE, LLC, dba, DICK AT YOUR DOOR to themselves, to
5 the detriment of creditors, including Plaintiff, and further utilizing false return addresses to
further deceive creditors.

7 f. Defendants ADAM HASCALL and BRYAN PRITZ committed their
8 offensive acts by use of the company name of RAIN PARADE, LLC, dba, DICK AT
9 YOUR DOOR solely as a shield against personal liability with no other company attributes.

10 9) The actions of defendants were outrageous, intentional, and malicious, and
11 done with reckless disregard of the fact that they would certainly cause plaintiff to suffer
12 severe emotional and physical distress.

13 10) As a proximate result of the acts of defendant, plaintiff suffered headaches,
14 severe emotional distress in the form of fear, nervousness, anxiety, worry, and indignity.

15 11) As a direct and proximate result of defendant's conduct, plaintiff has suffered general
16 damages in an amount to be determined by proof at trial.

17 12) Defendant's conduct was done knowingly, willfully, and with malicious intent, and
18 plaintiff is entitled to punitive damages in an amount to be determined by proof at trial.

19 WHEREFORE, plaintiff demands judgment from defendant for:

- 20 1. general damages according to proof;
21 2. special damages for psychological counseling and lost wages according to proof;
22 3. punitive damages;
23 4. costs of suit; and
24 5. such other and further relief as this court may deem just and proper.

25 Respectfully Submitted.

26 March 15, 2022

Law Offices of Richard L. Francis
& Associates, P.C.

27 By: 
Richard L. Francis,
Attorney for Plaintiff