

AUG 07 2015

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5 ATTORNEYS FOR PLAINTIFF

8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE
9 DESERT DISTRICT

11	MICHAEL R. SOLOMON,)	Case No. PSC 1503643
12	Plaintiff,)	COMPLAINT FOR VIOLATION OF
13	-vs-)	CALIFORNIA INFORMATION
14	DESERT HEALTHCARE DISTRICT;)	PRACTICES ACT OF 1977
15	KAY HAZEN, an individual;)	(California Civil Code
16	KATHY GRECO, an individual;)	Section 1798 et. Seq.)
17	DOES 1 through 100, inclusive,)	AND REQUEST FOR FINDING OF
	Defendants.)	JUST CAUSE UNDER CIVIL CODE
)	SECTION 1798.55 FOR THE
)	TERMINATION OF THE EMPLOYMENT
)	OF DEFENDANT KATHY GRECO

18 CAST OF CHARACTERS

19 1. Plaintiff is unaware of the true names and capacities,
20 whether individual, corporate, associate, partnership, limited
21 liability company, or otherwise, of Defendants Doe 1 through 100,
22 inclusive, and Plaintiff therefore sues said defendants by these
23 fictitious names. Plaintiff will ask leave of this Court to amend
24 this pleading to insert their true names and capacities when the
25 same can be ascertained.

26 2. At all times mentioned herein, Defendant Desert Healthcare
27 District was a valid and subsisting governmental agency functioning
28 as a healthcare district in accordance with the laws of the State

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1 of California.

2 3. At all times mentioned herein, Defendant KATHY GRECO was an
3 individual residing within the State of California, County of
4 Riverside, City of Palm Springs, and the above-entitled Judicial
5 District. At all times mentioned herein, Defendant KATHY GRECO was
6 the Chief Executive Officer of Defendant DESERT HEALTHCARE
7 DISTRICT.

8 4. At all times mentioned herein, Defendant KAY HAZEN was an
9 individual residing within the State of California, County of
10 Riverside, City of Palm Springs, and the above-entitled Judicial
11 District. At all times mentioned herein, Defendant KAY HAZEN was a
12 duly elected Director of Defendant DESERT HEALTHCARE DISTRICT.

13 5. At all times mentioned herein, each of the defendants was
14 acting as the agent, servant, employee, or joint venturer of each
15 of the remaining defendants, and, at all times mentioned herein,
16 each such defendant was acting within the course of scope of said
17 agency, servancy, employment, or joint venture.

18 6. All of the events described in this Complaint occurred
19 within the above-entitled County and Judicial District.

20 SATISFACTION OF GOVERNMENTAL CLAIM NOTICE REQUIREMENTS

21 7. On or about January 12, 2015, Plaintiff submitted a
22 Standard Tort Claim form to Defendant Desert Healthcare District.
23 On or about February 25, 2015, Defendant Desert Healthcare District
24 issued a formal notice to Plaintiff that said claim was rejected in
25 its entirety.

26 STATUTORY OBLIGATIONS

27 8. *California Civil Code Section 1798.24* provides that "No
28 agency may disclose any personal information in a manner that would

1 like the information disclosed to the individual to whom it
2 pertains...."

3 9. At all times mentioned herein, Defendants DESERT HEALTHCARE
4 DISTRICT, KATHY GRECO, and KAY HAZEN were subject to the
5 requirements of *California Civil Code Section 1798.24*.

6 10. *California Civil Code Section 1798.53* provides that any
7 person who intentionally discloses information, not otherwise
8 public, which they know or should reasonably know was obtained from
9 personal information shall be subject to a civil action for
10 invasion of privacy.

11 11. *California Code of Civil Procedure Section 1798.55*
12 provides that any violation of the CALIFORNIA INFORMATION PRACTICES
13 ACT OF 1977 (i.e. an unlawful release of information) by any
14 officer or employee of Defendant DESERT HEALTHCARE DISTRICT is, by
15 itself, just cause for termination of employment, irrespective of
16 any other job performance issues or any other issues.

17 12. At all times mentioned herein, Defendants DESERT
18 HEALTHCARE DISTRICT, KATHY GRECO, and KAY HAZEN were subject to the
19 requirements of *California Civil Code Section 1798.53*.

20 THE STORY

21 PART A. THE EVIL MOTIVE FOR DISCLOSURE OF PLAINTIFF'S 22 PERSONAL AND CONFIDENTIAL HEALTH INFORMATION

23 13. Defendant Kathy Greco, working in conjunction with
24 Defendant Kay Hazen developed a conspiracy to illegally expand the
25 service area of the Desert Healthcare District to distribute Desert
26 Healthcare District taxpayer funds to organizations that are not
27 located within the boundary of service of the Desert Healthcare
28 District and which primarily provide service to people who do not
reside within the Desert Healthcare District boundaries and who are

1 not now served by the Desert Healthcare District because they
2 reside outside the boundaries of the Desert Healthcare District.
3 The purpose of the expansion was to enhance the private business
4 affairs of Defendant Kay Hazen. Defendant Kay Hazen, owner and
5 operator of Kay Hazen and Company. Defendant Kay Hazen has numerous
6 business interests and arrangements with the following recipients
7 who are based outside of the boundaries of the Desert Healthcare
8 District and used the funds described below to provide service to
9 people who reside outside the Desert Healthcare District. The
10 organizations associated with Defendant Kay Hazen and Company who
11 are based outside the Desert Healthcare District and the funds they
12 received to provide service to people who reside outside the Desert
13 Healthcare District are as follows:

- 14 1. Coachella Valley Economic Partnership
- 15 (Valley IHUB) (\$500,000);
- 16 2. El Sol Neighborhood Education Center; (\$314,000);
- 17 3. Coachella Valley Volunteers in Medicine (\$125,000);
- 18 4. CVAG Link (10 Million Dollars;
- 19 5. Coachella Valley Health Pathways (\$500,000.00);
- 20 6. Coachella Valley Economic Partnership
- 21 Healthcare Professional Scholarships (\$250,000);
- 22 7. Alliance for a Healthier Generation (\$900,000);
- 23 8. Affordable Care Act Navigators (\$650,000.00);
- 24 9. Ready-Set-Swim (\$200,000);

25 Defendants KATHY GRECO and KAY HAZEN collaborated as described
26 hereinafter to distribute taxes collected from the taxpayers of the
27 Defendant Desert Healthcare District to the above-named programs
28 that do not provide services to constituents who reside within the

1 boundaries of the Desert Healthcare District.

2 14. The first step of the conspiracy between Defendants KATHY
3 GRECO and KAY HAZEN was to replace the longtime attorney for
4 Defendant Desert Healthcare District with the law firm of Best,
5 Best and Krieger, who Defendants KATHY GRECO and KAY HAZEN knew
6 previously represented the council members looting the treasury of
7 the City of Bell. Defendants KATHY GRECO and KAY HAZEN therefore
8 knew that Best, Best, and Krieger would counsel them on how to loot
9 the treasury of Defendant Desert Healthcare District to support
10 their personal business with illegal district expenditures of
11 taxpayer funds.

12 15. Defendants Kathy Greco and Kay Hazen, with the cooperation
13 of Best, Best, and Krieger, decided to used the Desert Healthcare
14 Foundation, a private, non-profit California corporation, to
15 illegally and secretly spend taxpayer monies in violation of
16 *California Health and Safety Code Section 32121* by having the
17 Desert Healthcare District give money to the Desert Healthcare
18 Foundation, a private non-profit corporation so the private non-
19 profit corporation could spend monies for programs that are not for
20 the benefit of the residents of the Desert Healthcare District and
21 do not benefit the people who are currently served by the Desert
22 Healthcare District as determined by the district boundaries.

23 16. Defendants KATHY GRECO and KAY HAZEN further failed to
24 comply with the requirements of *California Government Code Section*
25 *56133* by seeking legal authority to expand its sphere of influence
26 by seeking permission from the Riverside County Local Agency
27 Formation Commission as required by *California Government Code*
28 *Section 56133* to enable it to serve the communities that Defendants

1 Kathy Greco and Kay Hazen wish to divert the taxpayer monies of the
2 Desert Healthcare District to serve.

3 17. These illegal expenditures and diversion of funds through
4 the Desert Healthcare Foundation, a non-profit private corporation,
5 now total more than \$1,000.000.00, and were made in closed,
6 private, non-public session so that the expenditures would not be
7 disclosed to the public. These meetings were held in private at the
8 suggestion of Defendants Kathy Greco and Kay Hazen. The goal of
9 these illegal expenditures was to advance the political careers and
10 personal business interests of Defendant KAY HAZEN at the expense
11 of the taxpayers of the Desert Healthcare District.

12 18. Prior to August 4, 2014, Plaintiff had questioned the
13 legality of the transfer of monies from the Desert Healthcare
14 District to the Desert Healthcare Foundation, but was assured that
15 these transfers were legal. Plaintiff has since learned that these
16 assurances were lies and that the transfers are, in fact, illegal
17 and constitute embezzlement by Defendants KATHY GRECO and KAY
18 HAZEN.

19 **THE STORY**
20 **PART B: THE DISCLOSURE OF PERSONAL**
AND CONFIDENTIAL HEALTH INFORMATION

21 19. On August 4, 2014 at approximately 10:00 A.M., Plaintiff
22 MICHAEL R. SOLOMON, M.D. suffered a cerebro vascular accident
23 (C.V.A.), which is commonly described as a "Stroke". He was taken
24 to Desert Regional Medical Center, which is owned by Defendant
25 Desert Healthcare District and operated by Tenet Healthcare, for
26 treatment.

27
28 20. On August 4, 2014, as soon as your Plaintiff was admitted

1 to Desert Regional Medical Center, Defendant Kathy Greco misused
2 her position as Chief Executive Officer of the Desert Healthcare
3 District, the Lessor and Landlord of Tenant at Desert Regional
4 Medical Center, to obtain confidential and privileged personal
5 healthcare information about Plaintiff MICHAEL R. SOLOMON, M.D.
6 from Defendant Desert Healthcare District Staff and Tenet
7 Healthcare and its employees and physicians. Immediately upon
8 receipt of this confidential and privileged personal healthcare
9 information about Plaintiff MICHAEL R. SOLOMON, M.D., Defendant
10 KATHY GRECO contacted Kay Hazen, Mark Mathews, Glenn Grayman, M.D.,
11 and William Grimm, M.D., along with members of the Desert
12 Healthcare staff, and Best, Best, and Krieger and disclosed the
13 confidential and privileged personal healthcare information about
14 Plaintiff MICHAEL R. SOLOMON, M.D. that she had obtained from
15 Defendant Desert Healthcare District staff, Tenet Healthcare and
16 the Desert Regional Medical Center and its physicians.

17 21. The willful, intentional, and malicious reason for these
18 disclosures by Defendant DESERT HEALTHCARE DISTRICT, Defendant
19 KATHY GRECO, and Defendant KAY HAZEN was to inflict severe
20 emotional distress or trauma upon Plaintiff to result in the
21 resignation or removal of Plaintiff or to cause disgrace,
22 embarrassment, and create a question in the mind of the public and
23 electorate about the mental competence of Plaintiff MICHAEL R.
24 SOLOMON, M.D. and his ability to continue as a Director of the
25 Desert Healthcare District to enable Defendants KATHY GRECO and KAY
26 HAZEN to conceal the wrongful and nefarious acts of theft and
27 embezzlement of funds belonging to the taxpayers of the Desert
28 Healthcare District described above.

1 22. Defendant KATHY GRECO willfully and intentionally
2 communicated all of the confidential information to the community
3 at large as part of her scheme to inflict severe emotional distress
4 or trauma upon Plaintiff to result in either the resignation or
5 removal of Michael R. Solomon as a Director of the Desert
6 Healthcare District to conceal these aforescribed nefarious theft
7 and embezzlement of funds belonging to the Desert Healthcare
8 District.

9 23. Defendant Desert Healthcare District, Defendant KATHY
10 GRECO, and Defendant KAY HAZEN has violated *California Civil Code*
11 *Section 1798.45(c)* by disclosing confidential personal health
12 records of Plaintiff. As a proximate result thereof, Defendant
13 Desert Healthcare District, Defendant KATHY GRECO, and Defendant
14 KAY HAZEN are liable to Plaintiff for actual damages, including
15 mental suffering, under the provisions of *California Civil Code*
16 *Section 1798.48(a)* along with all costs of the action, including
17 reasonable attorney fees, under *California Civil Code Section*
18 *1798.48(b)*.

19 24. Defendant Desert Healthcare District, Defendant KATHY
20 GRECO, and Defendant KAY HAZEN has violated *California Civil Code*
21 *Section 1798.53* by intentionally disclosing information, not
22 otherwise public, when they knew or should have reasonably known
23 was obtained from personal information maintained by a state
24 agency. Pursuant to the provisions of *California Civil Code Section*
25 *1798.53*, Defendant Desert Healthcare District, Defendant KATHY
26 GRECO, and Defendant KAY HAZEN are therefore subject to a civil
27 action for invasion of privacy. As a proximate result thereof,
28 Plaintiff is entitled to all special or general damages, including

1 a minimum of \$2,500.00 in exemplary damages, as well as attorney
2 fees and costs.

3 25. Defendant KATHY GRECO, as the Chief Executive Officer of
4 the Desert Healthcare District, has intentionally violated many
5 provisions of the CALIFORNIA INFORMATION PRACTICES ACT OF 1977 in
6 violation of *California Civil Code Section 1798.55*, and has
7 indicated that she intends to continue violating provisions of the
8 CALIFORNIA INFORMATION PRACTICES ACT OF 1977. *California Civil Code*
9 *Section 1798.55* provides that the intentional violation of the
10 CALIFORNIA INFORMATION PRACTICES ACT OF 1977 is cause for
11 discipline, including termination of employment, and Plaintiff
12 requests that this Court make a finding that the intentional
13 violations of the CALIFORNIA INFORMATION PRACTICES ACT OF 1977 by
14 Defendant KATHY GRECO are, in fact, just cause for her termination
15 in accordance with the provisions of *California Civil Code Section*
16 *1798.55*.

17 26. As a proximate result of the wrongdoing of the Defendants,
18 and each of them, Plaintiff has sustained severe physical and
19 emotional distress. Plaintiff cannot ascertain the exact amount of
20 damages he has sustained thereby, but Plaintiff will ask leave of
21 this Court to amend this pleading to insert the correct amount when
22 the same can be ascertained.

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1 W H E R E F O R E, Plaintiff prays for judgment, according to
2 proof, as follows:

3 1. For a finding that Defendants DESERT HEALTHCARE DISTRICT,
4 KATHY GRECO, and KAY HAZEN violated *California Civil Code Section*
5 1798.45(c) by disclosing confidential personal health records of
6 Plaintiff;

7 2. For a finding that Defendants DESERT HEALTHCARE DISTRICT,
8 KATHY GRECO, and KAY HAZEN violated *California Civil Code Section*
9 1798.53 by intentionally disclosing information, not otherwise
10 public, when they knew or should have reasonably known was obtained
11 from personal information maintained by a state agency;

12 3. For actual damages, including emotional distress, according
13 to proof;

14 4. For all special or general damages, including a minimum of
15 \$2,500.00 in exemplary damages;


16 5. For an order finding that Defendant KATHY GRECO has
17 intentionally violated numerous provisions of the CALIFORNIA
18 INFORMATION PRACTICES ACT OF 1977 and that such violations by
19 themselves constitute just cause for Defendant DESERT HEALTHCARE
20 DISTRICT to terminate the employment of Defendant KATHY GRECO under
21 the provisions of *California Civil Code Section* 1798.55.

22 Dated: July 31, 2015

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LAW OFFICES OF CLARK GAREN

BY



CLARK GAREN,
ATTORNEY FOR PLAINTIFF

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Number, and address): CLARK GAREN 50564 LAW OFFICES OF CLARK GAREN P. O. BOX 1790 PALM SPRINGS, CALIFORNIA 92263 TELEPHONE NO.: (760) 323-4901 FAX NO.: (760) 288-4080 ATTORNEY FOR (Name): PLAINTIFF		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE STREET ADDRESS: 3255 EAST TAHQUITZ WAY MAILING ADDRESS: CITY AND ZIP CODE: PALM SPRINGS, CALIFORNIA 92262 BRANCH NAME: PALM SPRINGS COURTHOUSE		
CASE NAME: SOLOMON VS. DESERT HEALTHCARE		
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	CASE NUMBER: PSC 1503643 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 <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input checked="" type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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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. <input type="checkbox"/> Large number of separately represented parties
b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
c. <input type="checkbox"/> Substantial amount of documentary evidence | d. <input type="checkbox"/> Large number of witnesses
e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
f. <input type="checkbox"/> 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): 1
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: 08/06/2015

CLARK GAREN

(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.

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 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