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BY MARY GARCIA, Deputy

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7 Attorney for Plaintiff COLBERN C. STUART, III

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES, CENTRAL DIVISION

BC 429951

10 COLBERN C. STUART, III,

11 an Individual,

12 PLAINTIFF

13 v.

14 ASHWORTH, BLANCHET,
15 CHRISTENSON & KALEMKIARIAN

16 a Professional Corporation.

17 SHARON BLANCHET,

18 an Individual,

19 and does 1 -- 100, inclusive

20 DEFENDANTS

VERIFIED COMPLAINT FOR DAMAGES
FOR LEGAL MALPRACTICE,
INTENTIONAL AND NEGLIGENT
MISREPRESENTATION, FRAUD, BREACH
OF CONTRACT, INTENTIONAL AND
NEGLIGENT INFLICTION OF
EMOTIONAL DISTRESS, BREACH OF
FIDUCIARY DUTIES, AND UNFAIR
BUSINESS PRACTICES PURSUANT TO
CALIFORNIA BUSINESS AND
PROFESSIONS CODE SECTION 17200 ET
SEQ.; DEMAND FOR JURY TRIAL

21 1. This is a Complaint for Legal Malpractice, Intentional and Negligent Misrepresentation,
22 Fraud, Breach of Contract, Intentional and Negligent Infliction of Emotional Distress, Breach of
23 Fiduciary Duties, and Unfair Business Practices pursuant to California Business and Professions
24 Code section 17200 et seq.

25 2. Plaintiff Colbern C. Stuart, III, Esq. ("Stuart") is a citizen of the state of California,
26 doing business as managing partner of a law firm operating in Los Angeles, San Diego, and San
27 Jose, and residing in Marina Del Rey, Los Angeles County, California.

28 3. Defendant Ashworth, Blanchet, Christenson & Kalemkarian ("ABC&K") is a California
Professional Corporation with a principal place of business located at 2250 Third Avenue, San

1 Diego, California, 92101 and doing business in Los Angeles County, CA.

2 4. Defendant Sharon Blanchet ("Blanchet") at all times relevant hereto was an attorney
3 doing business at ABC&K with a principal place of business located at 2250 Third Avenue, San
4 Diego, California, 92101 and doing business in Los Angeles County, CA.

5 5. Venue within this County and division is appropriate as all times relevant hereto,
6 Defendants were conducting business as a law firm specializing in the area of family law in Los
7 Angeles and San Diego counties by representing, advising, communicating, collecting revenue
8 from, making representations to, and causing harm to Plaintiff within Los Angeles County.

9 6. Defendants and ABC&K, Blanchet, and Does 1 – 100 and each of them at all times
10 relevant hereto were the agents of every other Defendant, acting within the scope of said agency,
11 such that each and every Defendant herein is liable and accountable for the acts of each other
12 Defendant.

13 7. Plaintiff is unaware of the true names and capacities of Does 1-100 and will amend this
14 Verified Complaint for Damages upon learning the true names and capacities of said parties.

15 **First Cause of Action: Legal Malpractice**
16 **(Against Defendants and Does 1-10)**

17 8. Plaintiff incorporates herein paragraphs 1-7 above as if set forth fully herein.

18 9. At all times relevant hereto, Defendants owed a duty of care to Plaintiff to represent him
19 in legal advice, communications, billing, and guidance in accordance with relevant legal
20 standards of care within the practice of law.

21 10. Defendants breached the relevant duty care by failing to adequately represent Plaintiff in
22 providing competent legal advice, full and accurate communications, accurate billing, and legal
23 advice in accordance with relevant legal standards within the practice of law, as detailed more
24 fully below.

25 11. Specifically, Defendants, inter alia, recommended that Plaintiff stipulate to retaining
26 Stephen Doyne ("Doyne") as a mediator in the family law matter in which Plaintiff was
27 involved.

28 12. Defendants represented to Plaintiff that Doyne was one of the most qualified
professionals in San Diego County.

13. Defendants represented to Plaintiff in an email from Blanchet to Stuart that "You'll love
Dr. Doyne!"

14. Defendants represented to Plaintiff that Doyne, as a mediator, preferred to work toward a

1 shared custody plan between parents.

2 15. Defendants represented to Plaintiff that Doyne charged reasonable fees and was less
3 expensive than other methods, and less expensive than litigating such matters in Court.

4 16. Defendants represented to Plaintiff that Doyne "always" recommends 50/50 custody
5 sharing between parents.

6 17. Defendants failed to advise Plaintiff that Doyne had a close personal and professional
7 relationship with opposing counsel Jeffrey Fritz and Marilyn Bierer (collectively "Opposing
8 Counsel").

9 18. Defendants failed to advise Plaintiff that on information and belief that Doyne had
10 received numerous referrals of clients/patients and generated millions of dollars in revenue from
11 referrals by Opposing Counsel.

12 19. Defendants failed to advise Plaintiff that Doyne was not authorized to conduct mediations
13 because he regularly failed to file papers required by California Rules of Court to qualify him as
14 a mediator, C.R.C. 5.010, including, inter alia, the following forms: FL 325, FL 326, and FL 327
15 (attached hereto at exhibits "A", "B", and "C" respectively).

16 20. Defendants failed to research Doyne's qualifications and eligibility, and failed to advise
17 Plaintiff that these forms were forms required by law before Doyne could act as mediator in the
18 Stuart matter or any other matter which Doyne had worked.

19 21. Defendants failed to advise Plaintiff that Doyne's failure to file forms FL 325, FL 326,
20 and FL 327 made him legally incompetent to perform the services for which Defendant
21 recommended him.

22 22. Defendants failed to advise Plaintiff that Doyne had previously failed to file the required
23 forms in approximately hundreds of similar matters, including numerous other matters for which
24 Defendants had recommended Doyne.

25 23. Defendants failed to properly investigate Doyne's background, qualifications, credentials,
26 relationships with opposing counsel, and history of filing forms FL 325, FL 326, and FL 327.

27 24. Defendants failed to advise Plaintiff that Doyne's failure to file these required forms
28 enabled Doyne to overcharge for his services, to commit tax evasion in Plaintiff's matter and
dozens of similar matters for which Defendants recommended Doyne.

25. Defendants failed to advise Plaintiff that Doyne was in fact not authorized to conduct the
hundreds of mediations and evaluations he had performed for years prior, including Plaintiff's,

1 and was not authorized to perform the services Defendants recommended Doyne for Plaintiff.

2 26. Defendants failed to advise Plaintiff that Doyne's C.V. contains numerous
3 misrepresentations, misleading statements, falsified credentials and false claims relating to his
4 experience.

5 27. Defendants failed to advise Plaintiff that dozens of Doyne's present and former clients
6 had complained about Doyne's services, accusing him of extortion, fraud, dishonesty, bias,
7 overbilling, falsified credentials, tax evasion and/or numerous additional misrepresentations.
8 Defendants knew or had reason to know of many such complaints. See Exhibits D-Q attached
hereto.

9 28. Defendants advised Plaintiff that Doyne would perform collateral investigation with third
10 parties to verify claims made by litigants, yet Doyne failed to perform said collateral
11 investigations with any third parties as Defendants represented.

12 29. Defendants represented to Plaintiff that Doyne was honest and reliable. Doyne was not
13 honest and reliable.

14 30. Defendants advised Plaintiff that Doyne would not permit ex-parte contact between
15 himself and other parties without Plaintiff's presence or consent. Doyne in fact initiated or
16 acquiesced to extensive ex-parte contact between himself and other parties without Plaintiff's
17 presence or consent.

18 31. Defendants failed to advise Plaintiff that despite Doyne's track record of
19 misrepresentations and abuse, Doyne had claimed that no one could sue him for extortion, fraud,
20 misrepresentation, dishonesty, overbilling and incompetence because he claimed to be "immune"
or "privileged" from all such lawsuits.

21 32. Defendants failed to advise Plaintiff that Doyne would not conduct a "mediation", but
22 would instead attempt to act beyond his authority as a "judge" in the case.

23 33. Defendants failed to advise Plaintiff that Doyne regularly overbilled for services he did
24 perform.

25 34. Defendants failed to advise Plaintiff that Doyne regularly billed for services that he did
26 not, in fact, perform.

27 35. Defendants failed to advise Plaintiff that Doyne would use his position as "mediator" to
28 refer Plaintiff to Doyne's many colleagues—many of whom also charge exorbitant fees—and

1 require that Plaintiff utilize those professionals' unnecessary services or risk losing custody of
2 his child.

3 36. Defendants knew or had reason to know, yet failed to advise Plaintiff that Doyne did not
4 possess the qualifications, licenses, and degrees he claims to possess.

5 37. Defendants failed to advise Plaintiff that Doyne would use Plaintiff's son as a "pawn" to
6 attempt to extract tens of thousands of dollars from Plaintiff, depriving Plaintiff of thousands of
7 dollars.

8 38. Defendants failed to advise Plaintiff that Doyne regularly told parties he produced a
9 report to both counsel for "review and approval" prior to delivering it to the Court, but regularly
10 failed to abide by that promise.

11 39. Defendants failed to advise Plaintiff that Doyne falsely claimed that he preferred "equal
12 and shared custody" between parents and that he would work toward such an "equal and shared"
13 custody situation.

14 40. Defendants failed to advise Plaintiff that Doyne would use divisive instruments such as
15 unnecessary supervised visitation, separation instructions, stay-away from school instructions,
16 and unreasonable, unnecessary, and harmful restrictions on constitutionally guaranteed civil
17 liberties to extract funds from Plaintiff.

18 41. After being retained by Plaintiff based upon Defendants' representations, Doyne stated
19 that he used a "bag of tricks" to coerce his clients/patients into compliance with his profiteering
20 agenda rather than seeking healthy, cooperative resolutions.

21 42. Defendants failed to advise Plaintiff that Doyne would utilize the "Caldwell Report"
22 interpretive tool for the MMPI survey. The Caldwell report is a computer print-out similar to an
23 astrology reading.

24 43. Defendants failed to advise Plaintiff that Doyne regularly dishonestly manipulated the
25 "Caldwell Report" astrology reading to disfavor one or the other party.

26 44. Defendants failed to advise Plaintiff that Doyne fails to use any scientific methodology,
27 which is generally accepted in the field of Psychology for the purposes which Defendants, and
28 each of them, proscribed. For example, Defendants knew or had reason to know that Caldwell
Report has been widely criticized, and even called "dangerous." Two notable family law
specialists **Cheryl L. Karp, Ph.D.** and **Leonard Karp, J.D.** have described the problems with

1 the test thusly:

2 However, the MMPI must be interpreted in light of the biographical and
3 other information about the client. "Blind interpretations," where nothing
4 is known of the client except perhaps gender, may be useful for testing a
5 psychologist's memory about the descriptive statements attached to certain
6 individual scale elevations or certain profiles. They are not useful, *and*
7 *may be dangerous*, in interpreting MMPI results for forensic work or any
8 other professional psychology work.
9 Computer use has brought other problems to the area of MMPI
10 interpretation. Computer programs have been developed to allow
11 computers to score the raw data ... produce the files in printed graph form,
12 and do the work of fetching interpretative information from "cookbooks."
13 Undeniably, the computers save valuable time for psychologists. Yet, their
14 use with the MMPI has opened the way for some serious problems.
15 This advanced technology lends an image of "truth" or "accuracy" to the
16 printout results that may mislead even psychologists. Also, this technology
17 is more readily available to non-psychologists than is wise. Persons with
18 no or minimal training in psychology and psychological testing may use a
19 computer report to make statements about a person's personality
20 functioning that sound definitive or are presented as such. Even generally
21 competent and respectable practitioners in fields normally thought to be
22 "allied to" psychology, such as psychiatry or clinical social work, can
23 make the grievous error of believing that they have acted responsibly or
24 done a good job when they make conclusions about a client
25 based solely or predominantly on the MMPI, using a computer to produce
26 scores and interpretations. The MMPI needs to be interpreted in light of
27 many factors often not considered by the computer programs. Computer
28 programs frequently require only information about the client's sex, age,
 and achieved education level, not other factors such as current life
 stressors or other life experiences or environmental factors.
 Furthermore, when used as part of a testing battery, the MMPI results
 must be integrated with all the testing and historical data and finally

1 interpreted in light of all of the psychologist's psychological knowledge.
2 Doing this may alter the psychologist's original interpretation of the
3 MMPI, as will be discussed below in the section on the interpretation of
4 the Rorschach. Non-psychologists should not and usually cannot
5 administer a whole test battery and interpret it appropriately.
6 Secondly, many computer reports focus mainly on giving statements about
7 the elevation of each individual scale, with perhaps cursory statements
8 about the highest two scales considered together. Unfortunately, there is
9 not a statement at the beginning of the computer printout explaining
10 whether the statements are from research with a normal or abnormal
11 population.

Source: ParentingPlan.net

12 45. Doyne was not "honest" and, in fact, regularly committed malpractice, fraud, extortion,
13 and perjury.

14 46. Defendants knew or had reason to know of all of the above facts, including Doyne's
15 dishonesty and manipulation.

16 47. Doyne was also not "thorough" as he frequently failed to review or analyze dozens of
17 documents and abundant evidence presented to him, failed to review his clients' file, made
18 reckless, false, and malicious recommendations clearly indicating he had not reviewed the file,
19 and acted with oppression, fraud, and malice.

20 48. Defendants failed to advise Plaintiff that Doyne regularly refers clients to a select group
21 of his professional colleagues to perform additional unnecessary, fraudulent, and/or harmful
22 services such as intrusive and expensive supervised visitation, unnecessary child counseling, and
supervision centers.

23 49. Defendants failed to advise Plaintiff that Doyne and his colleagues would attempt to
24 entrap Plaintiff and/or his son in months or years of such extensive, unnecessary, and harmful
25 services, draining him of financial resources.

26 50. Defendants failed to advise Plaintiff that many other alternatives to use of Doyne were
27 preferable under these circumstances, including collaborative parenting education, "true"
28 informal mediation, mediation with unbiased mediators, mediation with volunteer attorneys,
mediation with less expensive mediators, mediation with individuals who waive all claims to

1 immunity, mediation with mediators who would agree to qualified immunity, attorney-to-
2 attorney "four way" informal negotiations, confidential counseling, as well as other alternative
3 dispute resolution techniques.

4 51. Doyne admitted that he was, in fact, not authorized to perform the activities that
5 Defendants recommended him to perform and he attempted to perform, including unilaterally
6 altering a custody schedule, changing the location of pick-ups and drop-offs, and imposing
7 draconian burdens on the parties, which Doyne himself described as "handcuffs" and his "bag of
8 tricks".

9 52. Defendants failed to advise Plaintiff that Doyne's pattern and practice in mediation and
10 evaluation is in fact to encourage conflict between the parties by encouraging hostile behaviors,
11 discouraging conciliatory behaviors, thereby prolonging the parties' conflict, increasing the
12 number of sessions he would require the parties to attend to "resolve" the conflict he encouraged,
13 charging more fees for his services, and thereby generating additional revenue for his practice at
14 the Plaintiff's expense.

15 53. Defendants failed to advise Plaintiff that on information and belief Doyne's pattern and
16 practice was to make false reports against his clients/patients to Child Protective Services,
17 thereby using the trust placed in him as a mediator to jeopardize the Plaintiff's relationship with
18 his child, then offer to modify or withdraw the false report in exchange for Plaintiff's payment to
19 Doyne of more fees or otherwise "paying off" Doyne. On information and belief, Doyne has
20 utilized such dishonest, subversive, and harmful techniques with many of his clients for decades,
21 including with Defendants' clients. Defendants knew or had reason to know of such dishonest
22 practices for years.

23 54. Defendants failed to disclose a conflict of interest in that they previously utilized Doyne
24 in other client matters in which they or their clients paid Doyne thousands or tens of thousands of
25 dollars in exchange for favorable opinions. Defendants failed to advise Plaintiff that Doyne
26 would insist that Plaintiff comply with this "cash for custody" illegal extortion scheme.

27 55. Defendants failed to advise that Doyne was, in fact, an incompetent mediator, regularly
28 made false statements under oath, regularly made false reports to CPS, regularly overcharged for
his services, regularly charged breathtaking sums for unnecessary and harmful services, regularly
billed for services he did not perform, regularly failed to meet the relevant professional standards
in his profession of psychology, and otherwise regularly committed fraud and/or extortion on his

1 patients/clients, acted with oppression, fraud, and malice, imposed unnecessary and ineffective
2 testing and other measures, and otherwise acted to extort and/or harm his patients/clients, and
3 their children.

4 56. Defendants failed to advise Plaintiff that Doyne had violated state and federal
5 patient/client and child privacy laws by disclosing confidential patient information to third
6 parties and that he would do so in Plaintiff's matter. Defendant did make illegal, unethical, and
7 inappropriate disclosures of private, privileged, and protected matters regarding Plaintiff.

8 57. After Plaintiff retained Doyne and advised Defendants of Doyne's incompetence and
9 unprofessional behavior, Defendant Blanchet admitted that such behavior was "not unusual" for
10 Doyne. Defendants failed to advise Plaintiff how to remedy such misbehavior by immediately
11 seeking to discharge Doyne and seek one or more of the other, more efficient and helpful ADR
12 procedures described above.

13 58. Defendants further failed to advise Plaintiff of his right to trial by jury.

14 59. Defendants had significant prior knowledge of Doyne's track record of illegal,
15 incompetent, and unethical behavior. After Plaintiff engaged Doyne, Defendant Blanchet
16 admitted to Plaintiff that Doyne "usually forms his opinions first, then twists the facts to fit his
17 opinion."

18 60. Defendants suggested that Plaintiff commit bribery by paying Doyne for his illegal,
19 unnecessary, harmful, and fraudulent behavior to form an opinion in Plaintiff's favor.

20 61. When Plaintiff realized concerns regarding Doyne's failures to investigate or otherwise
21 properly perform his duties, he consulted with Defendants. Defendants falsely advised Plaintiff
22 that he could not to request to record all sessions with Doyne to create a record of Doyne's
23 illegal behavior. In fact, Plaintiff had a right to record all such sessions. Defendants'
24 misrepresentation was to Plaintiff's disadvantage in that Plaintiff was prevented from preserving
25 evidence of Doyne's fraud and abuse.

26 62. Defendants failed to advise Plaintiff that by agreeing to mediate the action with Doyne,
27 Plaintiff would severely compromise his rights to review Doyne's opinions and actions by
28 judicial review, appeal, and by other professional oversight organizations.

63. Defendants failed to advise Plaintiff that by agreeing to engage Doyne, that Doyne could
commit any number of harmful, incompetent, malicious, fraudulent, and oppressive acts against
Plaintiff and his child, and then seek to invoke "immunity" or "privilege" for such harmful,

1 incompetent, malicious, fraudulent, and oppressive acts.

2 64. Said failures actually and proximately caused Plaintiff damages in an amount to be
3 proven at trial, but no less than \$1,000,000, accounting for the amount of money, time, and effort
4 spent preparing for and attending sessions with Doyne, the amount of money paid to Doyne and
5 the amount paid by Plaintiff to Defendants for Defendants' services relating to Doyne's
6 emotional distress and punitive damages.

7 65. Defendants further failed to advise Plaintiff that on information and belief Doyne
8 exhibited a pattern and practice of committing these fraudulent acts with dozens of other
9 clients/patients as described in the attached Combined (1) Application For Leave To File As
10 *Amici Curiae* And (2) amicus Brief Of Proposed *Amici Curiae*, (A) California Coalition For
11 Families and Children (B) National Coalition For Men, In Support Of Plaintiff Dr. Emad Tadros'
12 Motion To Continue Hearing And Conduct Discovery, attached hereto as Exhibit "D" and
incorporated herein by reference.

13 66. Such acts and omissions were conducted with oppression, fraud, and malice.

14 67. On or about January, 2009, Judge Joel Wohlfeil, who had presided over this case for one
15 year left the bench, to be replaced by Judge Lisa Schall.

16 68. Judge Lisa Schall has been reprimanded by the California Counsel for Judicial
17 Excellence three times for inappropriate conduct, drunk driving, reckless driving, and abuse of
18 discretion and was incompetent to sit in Plaintiff's family court matter.

19 69. At the time that Judge Schall entered the case, Defendants had knowledge of the above-
20 referenced facts.

21 70. At the time Judge Schall entered the case, Defendants had a duty and opportunity to
22 advise Plaintiff that he could file a pre-emptory "strike" against Judge Schall, removing her from
23 the case.

24 71. Defendants failed to advise Plaintiff of Judge Schall's reprehensible track record as a
25 judge.

26 72. Defendants further failed to advise Plaintiff that he could strike Judge Schall.

27 73. As an actual and proximate result, and in reliance on Defendants' failure to strike Judge
28 Schall, Plaintiff failed to strike Judge Schall from the case.

1 74. As an actual and proximate result of Defendant's failure to advise Plaintiff to strike Judge
2 Schall, Judge Schall proceeded to behave in exactly the same irresponsible manner she had
3 previously behaved, issuing numerous recklessly irresponsible decisions, causing harm to
4 Plaintiff in an exact amount to be proven at trial.

5 75. In performing the actions described hereinabove, Defendants acted with oppression,
6 fraud, and malice.

7 **Second Cause of Action: Intentional and Negligent Misrepresentation**
8 **(Against all Defendants and Does 11-20)**

9 76. Plaintiff incorporates herein paragraphs 1-75 above as if set forth fully herein.

10 77. The actions and representations described above were made intentionally, recklessly, and
11 negligently.

12 78. The actions and representations described above were material.

13 79. The representations described above were reasonably relied on by Plaintiff in retaining
14 Doyne and continuing to provide information to and work with Doyne, to pay Doyne, to pay
15 Doyne and Defendants, and other acts in reliance thereon.

16 80. Said reliance by Plaintiff actually and proximately caused Plaintiff damages in an amount
17 to be proven at trial, but no less than the amount of money, time, and effort spent preparing for
18 and attending sessions with Doyne, the amount of money paid to Doyne, the amount billed by
19 Defendants paid by Plaintiff for Defendants' services relating to Doyne, and cognizable
20 emotional distress.

21 81. In performing the acts and missions described herein above, Defendants acted with
22 oppression, fraud or malice.

23 **Third Cause of Action: Intentional and Negligent Infliction of Emotional Distress**
24 **(Against Defendants and Does 21-30)**

25 82. Plaintiff incorporates herein paragraphs 1-81 above as if set forth fully herein.

26 83. Defendants' actions described hereinabove were intentional and/or negligent.

27 84. Defendants owed a duty of care to properly advise Plaintiff of the facts set forth herein
28 above.

85. Defendants' actions described hereinabove actually and proximately caused Plaintiff
emotional distress, loss of business opportunities, and loss of monies spent retaining Doyne and

1 charged by Defendants relating to Doyne.

2 **Fifth Cause of Action: Breach of Fiduciary Duties**

3 **(Against Defendants and Does 31-40)**

4 86. Plaintiff incorporates herein paragraphs 1-85 above as if set forth fully herein.

5 87. Defendants, as attorneys for Plaintiff, owed Plaintiff a fiduciary duty to preserve and
6 protect Plaintiff's interests, rights, and opportunities.

7 88. Defendants, by virtue of the actions and failures to act described hereinabove, breached
8 said fiduciary duties.

9 89. As an actual and proximate result of Defendants' breach of fiduciary duties described
10 above, Plaintiff has been injured in an amount to be proven at trial.

11 90. In breaching said fiduciary duties, Defendants acted with oppression, fraud, or malice.

12 **Fifth Cause of Action: Unfair Business Practices pursuant to California**

13 **Business and Professions Code section 17200 et seq.**

14 **(Against Defendants and Does 41-50)**

15 91. Plaintiff incorporates herein paragraphs 1-90 above as if set forth fully herein.

16 92. Defendants, by virtue of the actions and failures to act described hereinabove, committed
17 violations of California Business and Professions Code section 17200 et seq.

18 93. As an actual and proximate result of Defendants' violation of said Business and
19 Professions code described above, Plaintiff has been injured in an amount to be proven at trial.

20 94. In breaching said Business and Professions Code provisions, Defendants acted with
21 oppression, fraud, or malice.

22 95. On November 25, 2009, Plaintiff delivered a demand letter to Defendants, detailing the
23 breaches and violations described hereinabove. Plaintiff requested Defendants'
24 acknowledgement of and response to said claims. Defendant failed and refused to comply with
25 Plaintiff's reasonable requests. As a result, Plaintiff has been forced to file this lawsuit.

26 **Prayer for Relief:**

27 Plaintiff hereby prays for relief as follows:

- 28 1. For damages in excess of \$100,000, the exact amount to be proven at trial;
2. For interest, attorney's fees, and costs of suit incurred herein;

- 1 3. For injunctive relief preventing Defendants from causing such further injuries to Plaintiff
2 and other clients of Defendants;
3 4. For additional remedial measures requiring Defendants to strictly adhere to the
4 professional standards to which they are bound by law and submit to an annual audit by
5 Plaintiff for compliance w/same; and
6 5. For punitive and exemplary damages in an amount to be proven at trial;
7 6. For such further and other relief as this Court deems just and proper.
8 Plaintiff hereby demands a trial by jury.

9
10 Dated: December 31, 2009

Lexevia, PC

11
12
13 By: 

Colbern C. Stuart III, Esq.

Attorney for *Plaintiff*

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VERIFICATION

I verify under penalty of perjury that the facts alleged in the foregoing complaint are true and correct to the best of my information, knowledge and/or belief.

Dated: December 31, 2009

BY:



COLBERN C. STUART III, Plaintiff