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FILED

JAN 14 2015

RICHARD W. WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

Laurent GRANIER,
PLAINTIFF,

vs.

Jack LADD, Lyle WOLLERT, James
PETTIT, Ryan YORK, Phil WOWAK, CJ.
LUCAS, Cynthia VELASCO, Cynthia
DRAGER, Bob JORGENSON,
GAIL LOUIS, Chris BAGGALEY,
« INTERINSURANCE EXCHANGE OF
THE AUTOMOBILE CLUB », «AAA
SOUTHERN CALIFORNIA», Robert T.
BOUTTIER, John F. BOYLE, David LANG,
Scott KWIERAN, James ROBBINS, Glenn
RENWICK, Chuck JARRET,
“PROGRESSIVE WEST INSURANCE”,
Tom HAINES, Paul VINCENT,
“CALIFORNIA HIGHWAY PATROL”,
Salvador ORTIZ, Nancy FLORES, Dave
JONES, « CALIFORNIA DEPARTMENT
OF INSURANCE », Jean M. SHIOMOTO,
“DEPARTMENT OF MOTOR VEHICLES
OF CALIFORNIA”, Edmund Gerald
“Jerry” BROWN, « STATE OF
CALIFORNIA », Perri Noelle
MONTGOMERY,

and DOES 1-50, inclusive

DEFENDANTS.

Case n° CV 14-05372 - EJD - HRL

AMENDMENT For ADDITION of DEFENDANTS

1 To all Defendants and/or their attorneys,

2 1. ADDITION OF NEW DEFENDANTS.

3 Following the late discovery of several acts of corruption, of several official declarations containing
4 deliberate fake information, omissions and lies, of blackmails, and even fake testimonies under perjury,

5 committed by persons who have not been cited as defendant in the original complaint ; linked acts and
6 declarations helping the defendants already cited to erase and hide their criminal and federal offenses,

7 Plaintiff has to add those following persons :

- 1 • **Christopher APPLETON,**
- 2 • **Steven J. DAWSON,**
- 3 • **Richard S. GOWER,**
- 4 • **Craig MODLIN,**
- 5 • **Rebecca CONNOLLY.**

6

7 **2. NEW PARTIES.**

- 8 – **Christopher APPLETON** is the attorney representing Jack LADD, Lyle WOLLERT and
9 « LADD'S Auto Body & Towing » in the civil complaint (case CV180309) filed by Plaintiff at
10 Superior Court of Santa Cruz ; he is paid by « NATIONWIDE Insurance » ; an individual ; regarding
11 his personal deliberate personal criminal offenses, lies and perjuries (among them, a double fake
12 testimony), committed to distort the truth, to create an obstruction of justice, to create a confusion,
13 indeed to increase Plaintiff's damages by committing new violations of Plaintiff's Civil Rights as a
14 deprivation of his rights to obtain and to get justice, a fair trial, a payment for his damages, so, he is
15 sued in his individual and official capacities ; his office address : *505 14th St. Suite 1210, Oakland,*
16 *CA 94612 ;*
- 17 – **Steven J. DAWSON** is the attorney representing « INTERINSURANCE EXCHANGE OF THE
18 AUTOMOBILE CLUB », but also « Automobile Club of Southern California », and defendants CJ.
19 LUCAS and Cynthia VELASCO in the civil complaint (case CV180309) filed by Plaintiff at
20 Superior Court of Santa Cruz ; he is employed by the insurance company ; an individual ; regarding
21 his personal deliberate criminal offenses, blackmails, lies and perjuries, his collusion with Richard S.
22 GOWER and Craig MODLIN for the corruption of the judge Rebecca CONNOLLY, offenses
23 committed to distort the truth, to create an obstruction of justice, to create a confusion, to increase
24 Plaintiff's damages by committing new violations of Plaintiff's Civil Rights as a deprivation of his
25 rights to obtain and to get justice, a fair trial, a payment for his damages, so, he is sued in his
26 individual and official capacities ; his office address : *Automobile Club of Southern California, 3333*
27 *Fairview Road, A451, COSTA MESA, CA 92626.*

1 – **Richard S. GOWER** is the attorney representing Perri Noelle MONTGOMERY in the civil
2 complaint (case CV180309) filed by Plaintiff at Superior Court of Santa Cruz ; he is paid by the
3 insurance company « INTERINSURANCE EXCHANGE OF THE AUTOMOBILE CLUB » ; an
4 individual ; regarding his personal deliberate criminal offenses, blackmails, lies and perjuries, his
5 collusion with Steven J. DAWSON and Craig MODLIN for the corruption of the judge Rebecca
6 CONNOLLY, offenses committed to distort the truth, to create an obstruction of justice, to create a
7 confusion, in addition of his fraud by the fact he mainly defends illegally on the sly the interest of
8 « INTERINSURANCE EXCHANGE OF THE AUTOMOBILE CLUB » rather than the one of his
9 official client, by trying to erase the criminal offenses of those who pay him, so, offenses committed
10 to distort the truth, to create an obstruction of justice by erasing the criminal offenses committed by
11 « AAA Southern California », in order to increase Plaintiff's damages by committing new violations
12 of Plaintiff's Civil Rights as a deprivation of his rights to obtain and to get justice, a fair trial, a
13 payment for his damages, so, he is sued in his individual and official capacities, his office address :
14 *523 West Sixth Street, Ste 1134, Los Angeles, CA 90014.*

15 – **Craig MODLIN** is the attorney representing « State of California », Insurance commissioner Dave
16 JONES and Governor Jerry BROWN, in the civil complaint (case CV180309) filed by Plaintiff at
17 Superior Court of Santa Cruz ; an individual ; regarding his personal deliberate criminal offenses,
18 lies and perjuries, his collusion with Richard S. GOWER and Steven J. DAWSON for the corruption
19 of the judge Rebecca CONNOLLY thanks to his hierarchical connection with her by links of
20 subordination, leading to conflicts of interest by his position of Deputy Attorney General, offenses
21 committed to distort the truth, to create an obstruction of justice, to create a confusion, in order to
22 increase Plaintiff's damages by committing new violations of Plaintiff's Civil Rights as a deprivation
23 of his rights to obtain and to get justice, a fair trial, a payment for his damages, so, he is sued in his
24 individual and official capacities, his office address : *1515 Clay Street, 20th floor, P.O. Box 70550,*
25 *Oakland, CA 94612-0550.*

26 – **Rebecca CONNOLLY** is the judge in the civil complaint (case CV180309) filed by Plaintiff at
27 Superior Court of Santa Cruz ; an individual ; regarding her personal deliberate criminal offenses by
28 her corruption by two groups of parties having and sharing common interests, the one made with

1 Craig MODLIN (who is Deputy Attorney General), « State of California », Insurance commissioner
2 Dave JONES and Governor Jerry BROWN, with whom she is under subordination links and
3 conflicts of interest, and the one made with the couple of groups of parties, Richard S. GOWER,
4 who represents officially Perri Noelle MONTGOMERY but indeed « INTERINSURANCE
5 EXCHANGE OF THE AUTOMOBILE CLUB », and Steven J. DAWSON, « INTERINSURANCE
6 EXCHANGE OF THE AUTOMOBILE CLUB », in this civil lawsuit filed at Superior Court of
7 Santa Cruz, providing advantages, benefits and privileges for her own benefit, committing an
8 obvious deliberate obstruction of justice leading to a violation of Plaintiff's Civil Rights as a
9 deprivation of his rights to obtain and to get justice, a fair trial, a payment for his damages, so, she is
10 sued in his individual and official capacities, his office address : *701 Ocean Street, Santa Cruz, CA*
11 *95060.*

12 **3. STATEMENT OF NEW FACTS.**

13 Plaintiff re-alleges herein by this reference each and every allegation previously contained in the original
14 complaint filed the 08th of december 2014 at UNITED STATES DISTRICT COURT, NORTHERN
15 DISTRICT OF CALIFORNIA, SAN JOSE DIVISION.

16 **1. Christopher APPLETON.** He used bad faith, lies and declarations containing fake allegations in
17 order to distort the truth, to do an obstruction of justice. He did write and file two testimonies at
18 Superior Court of Santa Cruz. In his absurd, irrelevant and useless personal testimonies of the 01st of
19 december 2014 (exhibit 14), he swears under penalty of perjury that he is not party, but he is the
20 attorney of Jack LADD, Lyle WOLLERT and « LADD'S Auto Body & Towing », and provide them
21 for this case as their attorneys. So, first, his testimony is a perjury because he is a party, and he lied.
22 Second, his testimony is a perjury because he declares knowing where is Plaintiff's car, but he does
23 not provide any proof, any document, and worse he does not know Plaintiff's car ; indeed, he has not
24 seen it, not before the theft, not after, so, he can not testify if it is true, if it is really Plaintiff's car, and
25 let alone its condition, if something has been damaged, changed or stolen, and so, he lied. In
26 addition, such a testimony has no value because the purpose of the problem is the fact that Plaintiff's
27 car has been stolen and given by Jack LADD. And so, the fact to declare where the car is located
28 now, does not erase any related prior criminal offense. The fact that a stolen good has been recovered

1 does not erase the fact it has been stolen, and does not erase the theft. Otherwise, the present
2 complaint to a federal court is regarding the violations of Plaintiff's Civil Rights, and Christopher
3 APPLETON did and filed several declarations dated of the same date, the 01st of december 2014,
4 which are a lot of dishonest and unlawful acts using bad faith, fake allegations, distortion of the
5 truth, lies, all of them are demonstrated by the exhibits « 2, 5, 6, 7, 8 and 9 ». He even used some
6 unconstitutional local californian laws which were yet denounced in the original complaint by
7 Plaintiff, in order to deprive Plaintiff of his Civil Rights, the right to get a fair trial, the right to have
8 a payment for the damaged he suffered and he is suffering, more and more.

9 **2. Steven J. DAWSON**, he is an attorney working at Automobile Club of Southern California, but he
10 claims that there is no narrow link between this company and the insurance company
11 « INTERINSURANCE EXCHANGE OF THE AUTOMOBILE CLUB ». His rôle is to create a
12 confusion, yet given by the numerous different names used by its employees and responsables for
13 this insurance company, even a fake one, « CAA », used officially (exhibit 2 and 3). Steven J.
14 DAWSON works hard and illegally in order to hide the numerous criminal and federal offenses
15 committed by its employers and their employees (CJ. LUCAS, Cynthia VELASCO, Cynthia
16 DRAGER, Bob JORGENSON), and perhaps his own criminal offenses if he participated in the prior
17 ones, from their blacmails to the theft, and from their refuse to respect law to pay Plaintiff's medical
18 expenses to their lies and their acts of corruption to erase those criminal offense. He works hard and
19 illeggaly too, to hide the serious unlawful issue of the insurance company regarding his « ghost »
20 agent for service, Gail LOUIS. Steven J. DAWSON is in the collusion with Richard S. GOWER and
21 Craig MODLIN for the corruption of the judge Rebecca CONNOLLY. The first one manages the
22 corruption (also attorney of criminals as drug cartels), and the second one gives the power by his link
23 of subordination as Deputy Attorney General. He uses bad faith, fake allegations, distortion of the
24 truth, lies, even the wrong use of some unconstitutional local californian laws which are denounced
25 in the original complaint by Plaintiff, in order to deprive Plaintiff of his Civil Rights, the right to get
26 a fair trial, the right to have a payment for the damaged he suffered and he is suffering, more and
27 more. In addition, he is the main key and manager of two main blackmails on Plaintiff, the last
28 responsible for the lack of payment from the insurance company to Plaintiff about his property

1 damages, but also about his body injuries, where Plaintiff has had yet for several thousands of
2 dollars eepenses. For reminder, this company has to pay to Plaintiff for his both damages, for which
3 Plaintiff has had several thousands of dollars in medical expenses, he is deprived of the use of his car
4 (accidented) and deprived of his car (stolen), and then since 4 months, all of this caused by car
5 accident where he is victim, 0% responsible, and for now, he has lost more than \$75,000.

6 Steven J. DAWSON works hard to deprive Plaintiff of his Civil Rights, the right to get a fair trial,
7 the right to have a payment for the damaged he suffered and he is suffering, more and more, federal
8 offenses yet denounced in the original federal complaint.

9 **3. Richard S. GOWER.** He is the attorney defending Perri Noelle MONTGOMERY in the civil
10 lawsuit filed at Superior Court of Santa Cruz. He is paid by the insurance company
11 «INTERINSURANCE EXCHANGE OF THE AUTOMOBILE CLUB ». In fact, Richard S.
12 GOWER did not a work to defend Perri Noelle MONTGOMERY but he did use her to protect his
13 real client, the ones who pay him, the responsables of the insurance company and its main company
14 «AAA », Robert T. BOUTTIER, John F. BOYLE, David LANG. It is interesting to mention that it is
15 unlawful for a normal company to get an insurance company. Lately, Richard S. GOWER tried to
16 bypass Perri Noelle MONTGOMERY when Plaintiff wanted to serve her the summons about the
17 present federal complaint, which explains the bad role of the insurance company against her via her
18 attorney given by her insurance company. Indeed, an attorney, a real one who should be paid by her,
19 meaning defending really her, would have sued « INTERINSURANCE EXCHANGE OF THE
20 AUTOMOBILE CLUB » and all of its responsables, all defendants in the complaints, to have put her
21 in a tricky and unlawful situation, to have not respected their professional obligation to pay damages.
22 A real attorney would have win money for her, from this insurance company and « AAA » for their
23 dirty behaviour in her name. A real attorney would defend her, would attack and sue this insurance
24 company to have failed to its duty, and to have put her in a tricky situation, and worse, criminal one.
25 Mainly, Richard S. GOWER used fake allegations and blackmail in his letters (exhibit 13), by saying
26 that his car is at COPART, which is first, not his business as Perri Noelle MONTGOMERY's
27 attorney, but proves he works indeed for the insurance company ; second, it is a way to oblige
28 Plaintiff to take his car, but we do not even know if it is the right one ; and third, a condition to repay

1 his medical expenses .

2 Otherwise, Richard S. GOWER is the manager in the collusion with Craig MODLIN and Steven J.
3 DAWSON for the corruption of the judge Rebecca CONNOLLY.

4 Richard S. GOWER works hard to deprive Plaintiff of his Civil Rights, the right to get a fair trial,
5 the right to have a payment for the damaged he suffered and he is suffering, more and more, federal
6 offenses yet denounced in the original federal complaint.

7 **4. Craig MODLIN.** He is the attorney of « State of California », Insurance commissioner Dave
8 JONES and Governor Jerry BROWN in the lawsuit filed at Santa Cruz Superior Court. But, he is
9 also, Deputy Attorney General, and associated with Amala D. HARRIS, Attorney General of
10 California and Jeffrey R. VINCENT, Supervising Attorney General, as representing those
11 defendants ; So, Craig MODLIN is in the hierarchy network of the judge Rebecca CONNOLLY. He
12 used the power of his position, but too, the ones of his co-representatives and the ones of his so-
13 called « clients », so, all of this links of subordination to get privilege, protection and illegal and
14 unlawful benefits against the truth and Plaintiff in his lawsuit.

15 Craig MODLIN gives the power to Richard S. GOWER, the manager, in the collusion with Steven J.
16 DAWSON for the corruption of the judge Rebecca CONNOLLY.

17 He uses bad faith, fake allegations, distortion of the truth, lies as regarding the responsibilities and
18 duties of the « State of California » concerning its agencies, as « California Department of
19 Insurance » (exhibits 10 and 11), even the wrong use of some unconstitutional local californian laws
20 which are denounced in the original complaint by Plaintiff, in order to deprive Plaintiff of his Civil
21 Rights, the right to get a fair trial, the right to have a payment for the damaged he suffered and he is
22 suffering, more and more.

23 Craig MODLIN works hard to deprive Plaintiff of his Civil Rights, the right to get a fair trial, the
24 right to have a payment for the damaged he suffered and he is suffering, more and more, federal
25 offenses yet denounced in the original federal complaint.

26 **5. Rebecca CONNOLLY.** She is the judge who has been corrupted by Craig MODLIN for the
27 benefit of defendants Governor Jerry BROWN and commissioner Dave JONES, and for the one of
28 « State of California ». She granted them before the hearing despite the numerous criminal offenses,

1 perjuries. Instead to declare that she has no jurisdiction to judge such a case, a motion involving
2 persons with whom she is linked, she gave a judgement. Otherwise, she has unlawfully accepted an
3 illegal process in a legal procedure (motion of the 09th of January 2015) by the fact it has been
4 presented and filed by two persons, Amala D. HARRIS and Jeffrey R. VINCENT, who are not
5 allowed by law to represent someone else, having not a registration at State Bar.

6 Her presence in the present federal complaint is not for her judgement which is unlawful by its
7 nature (more than authorized by law, as the fact to dismiss causes of actions which concerns more
8 defendants than the ones for which the motion has been filed), but because she deprives Plaintiff of
9 his Civil Rights, the right to get a fair trial, the right to have a payment for the damaged he suffered
10 and he is suffering, more and more, federal offenses denounced yet in the original federal complaint,
11 by refusing to admit and to act regarding the problem of integrity caused by her link of subordination
12 with defendants. She did an obstruction of justice too, by not suing this party who committed
13 perjuries.

14 **4. ADDITION OF THE NEW DEFENDANTS IN THE CAUSES OF ACTION.**

15 Christopher APPLETON, Steven J. DAWSON, Richard S. GOWER, Craig MODLIN and Rebecca
16 CONNOLLY are included in the following causes of actions :

17 **CLAIM 5**

18 **THEFT OF EVIDENCE**

19 **Violation of Civil Rights**

20 Christopher APPLETON, Steven J. DAWSON and Richard S. GOWER.

21 **CLAIM 6**

22 **FAKE DECLARATIONS, LIES AND PERJURY TO AN OFFICIAL AGENCY**

23 **Violation of Civil Rights**

24 Christopher APPLETON, Steven J. DAWSON, Richard S. GOWER and Craig MODLIN.

25 **CLAIM 7**

26 **CORRUPTION AND OBSTRUCTION OF JUSTICE BY OFFICER HAVING AUTHORITY**

27 **Violation of Civil Rights**

28 Christopher APPLETON, Steven J. DAWSON, Richard S. GOWER and Craig MODLIN.

1 **CLAIM 8**

2 **FAKE DECLARATION, DISSIMULATION, LIES, PERJURY AND ALTERATION OF THE TRUTH**
3 **IN ORDER TO DELETE AND ERASE EVIDENCES OF CRIMINAL AND FEDERAL OFFENSES**

4 **Violation of Civil Rights**

5 Christopher APPLETON, Steven J. DAWSON, Richard S. GOWER, Craig MODLIN and Rebecca
6 CONNOLLY.

7 **CLAIM 9**

8 **FAKE DECLARATION, DISSIMULATION, LIES, PERJURY AND ALTERATION OF THE TRUTH**
9 **TO AUTHORITIES IN ORDER TO DELETE AND ERASE AN OFFICIAL REPORT**

10 **Violation of Civil Rights**

11 Christopher APPLETON, Steven J. DAWSON, Richard S. GOWER and Craig MODLIN.

12 **CLAIM 11**

13 **RECEIVING OF STOLEN GOODS AND PARTICIPATION IN DESTRUCTION OF EVIDENCE**

14 **Violation of Civil Rights**

15 Christopher APPLETON, Steven J. DAWSON, Richard S. GOWER and Craig MODLIN.

16 **CLAIM 12**

17 **EXTORTION ATTEMPT AND BLACKMAILS**

18 **Violation of Civil Rights**

19 Christopher APPLETON, Steven J. DAWSON, Richard S. GOWER and Craig MODLIN.

20 **CLAIM 13**

21 **COLLUSION OF ORGANIZED GROUP FOR OBSTRUCTION OF JUSTICE AND ALTERATION**
22 **OF THE TRUTH IN ORDER TO DELETE and ERASE EVIDENCE OF CRIMINAL OFFENSES**

23 **Violation of Civil Rights**

24 Christopher APPLETON, Steven J. DAWSON, Richard S. GOWER, Craig MODLIN and Rebecca
25 CONNOLLY.

26 **CLAIM 14**

27 **COLLUSION FOR NEGATIVE HARASSMENT AND INTENTIONAL INFLICTIONS OF**
28 **EMOTIONAL DISTRESS**

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Violation of Civil Rights

Christopher APPLETON, Steven J. DAWSON, Richard S. GOWER, Craig MODLIN and Rebecca CONNOLLY.

CLAIM 15

DISCRIMINATION REGARDING NATIONAL ORIGIN

Violation of Civil Rights

Christopher APPLETON, Steven J. DAWSON, Richard S. GOWER, Craig MODLIN and Rebecca CONNOLLY.

The 14th of january 2015.

Laurent GRANIER, Pro se Plaintiff.