

Laurent GRANIER
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ORIGINAL FILED
Superior Court of California
County of Los Angeles

SEP 10 2014

Plaintiff, self-represented

Sherr R. Carter, Executive Officer/Clerk
By Amber Hayes Deputy

SUPERIOR COURT OF CALIFORNIA

LOS ANGELES SUPERIOR COURT – STANLEY MOSK

BC557351

Case n°

Complaint for

Law Root
GRANIER,
an individual,
PLAINTIFF,

vs.

- **Cynthia HACKLER,**
attorney/lawyer,
an individual,

- **THE STATE BAR OF CALIFORNIA,**
a public corporation,

- **Luis J. RODRIGUEZ,**
State Bar President,
an individual

-and DOES 1-50, inclusive
DEFENDANTS,

1. - PROFESSIONAL OFFICE'S ADDRESS FRAUDS
2. - LACKS OF RESPECT FOR THE ESSENTIAL PROFESSIONAL OBLIGATIONS
3. - UNLAWFUL INVOICES
4. - INVOICE FRAUDS
5. - EMBEZZLEMENT AND MISAPPROPRIATION OF FUNDS
6. - BLACKMAILS, THREATS, INTIMIDATIONS, PERSECUTION and INTENTIONAL INFLICTIONS OF EMOTIONAL DISTRESS
7. - DELIBERATE OBSTRUCTION OF JUSTICE
8. - WITHHOLDING OF INFORMATION
9. - WITHHOLDING OF DOCUMENTS
10. - LACKS OF LEGAL KNOWLEDGE
11. - LACK OF STUDY THE CASE
12. - CORRUPTION, COLLUSION, CHEATING, LIES, SCAMS, BAD FAITH, PERJURY, USE OF FAKE WITNESS
13. - DELIBERATE NEGLIGENCE
14. - DELIBERATE MALPRACTICES
15. - PROFITABLE AND USEFUL PASSIVE COMPLICITY WITH THE ADVERSE PARTY
16. - HARASSMENT TO GIVE UP LAWSUITS AGAINST THE ADVERSE PARTY
17. - UNLAWFUL PRACTICE OF THE PROFESSION OF LAWYER
18. - IMPOSTURE
19. - BREACHES OF CONTRACT
20. - FAULT OF VALIDATION, REGISTRATION AND ACCREDITATION.
21. - PASSIVE COMPLICITY, BREACH OF DUTY, LACK OF NEUTRALITY AND STAKEHOLDER INVOLVEMENT
23. - PROFESSIONAL LIABILITIES, JOINT AND SEVERAL FINANCIAL LIABILITY AND SURETIES

1
2 **Plaintiff, Laurent GRANIER (hereinafter « Plaintiff » or « GRANIER »)**
3 **alleges and pleads as follows:**
4

5 **The original case.**
6

7 Following an ad posted on the website « craigslist.org », Laurent GRANIER rented an apartment
8 in-law located at 2711 Cornett Dr (in the canyon of Laurel Canyon, from Elrita Street), Los Angeles

1 (90046), at Dean TURCHI (nickname DEANO or DINO), since the 3rd of march. The landlord
2 lives in the main house which is attached, in fact, it is a house shared in two apartments with two
3 separate enters, each unit having its bathroom and its kitchen.

4 Everything was fine. The Landlord was happy to have a quiet person, paying always on time,
5 being flexible about nuisances caused by the landlord still working to rebuild his house, even in the
6 night.

7 Laurent GRANIER left the apartment for few days, since monday 12th of may to thursday 15th,
8 but still paid and included. Dean TURCHI used this time to work in the apartment, nevertheless
9 paid for its rental by Laurent GRANIER. When Laurent GRANIER came back this afternoon of the
10 15th of may, he found his apartment wide open, even the main door, with nobody around, even not
11 the landlord living in the attached main house. Laurent GRANIER discovered the bag he had
12 hidden because containing confidential documents and cash, half open, moved from the hidden
13 location, and at the view of anybody. He discovered it was missing among his cash, one bill of 500
14 euro and one bill of 100 euro. Laurent GRANIER sent at once a text message to Dean TURCHI to
15 inform him of the robbery, and to get answers about the fact his apartment was left wide open. Dean
16 TURCHI did not answered, even replied. He said later that he had to leave quickly this afternoon,
17 (with no reason...), and so, he had forgotten to close and to lock the door of the apartment...

18 The day after, Dean TURCHI was upset, sending to Laurent GRANIER 16 sms, to try to oblige
19 him to leave the appartment, nevertheless already paid in full since ten days, and for one month, so
20 until the 7th of june. Laurent GRANIER asked him again (He asked him yet one month ago) to
21 avoid to send him a lot of sms, but rather to send him emails, nevertheless a way already used
22 sometimes by Dean TURCHI. He replied few hours later. His emails were strange, and Laurent
23 GRANIER told him he wanted just to be quiet and to not be disturbed anymore, having paid, and
24 having not the mood to discuss for nothing. Following the Dean TURCHI's email where he was
25 reproching him a lot of fake, wrong and inapropriate things, far of a normal correspondence
26 between landlord and tenant, but close to a dispute of a couple, Laurent GRANIER replied to him
27 that he was not his boyfriend, meaning not gay. Dean TURCHI became angry with a more strange
28 behaviour. Dean TURCHI opened the door of Laurent GRANIER's apartment with no
29 authorization, he hurried into, and started to yell to him, saying a lot of stupid, irrelevant, strange,
30 fake and wrong sentiments, and worse, accusing Laurent GRANIER of acts and behaviours in fact
31 done by the landlord himself. Laurent GRANIER understood that something wrong happened by
32 his kind of transfer (when a person puts and accuses another person about acts and behaviours he
33 did himself).

34 Laurent GRANIER tried to talk to him quietly, but he became more upset. Laurent GRANIER
35 left the room to go to the other one, thinking he could calm down and leave, but in fact he entered
36 more in the appartment and continued to yell to him with these strange, unrelated, irrelevant and
37 fake assertions.

38 Laurent GRANIER knew that Dean TURCHI was obsessed by a realtor in San Francisco who
39 screwed him last year when he sold his house. According him, he tried all kinds of therapy to avoid,
40 to quit his obsession, and one week ago, he told to Laurent GRANIER he had in mind to kill his
41 realtor, having no other way to solve his « mind » problem. He started to become insane. He told to
42 Laurent GRANIER that the last thing he wanted to try was a kind of yoga delivered by a weird
43 association, and he had to start the next week, indeed the week when Laurent GRANIER came back
44 and found his apartment wide open, his bag not anymore hidden, with missing money. Laurent
45 GRANIER left Los Angeles for few days, and when he came back this thursday, Dean TURCHI
46 was strangely dangerous.

47 So, knowing this about Dean TURCHI, who was able to have in mind to kill his realtor and who
48 was obsessed since almost one year about him, and seeing his radical change of behaviour for a
49 very strange one by saying fake assertions on Laurent GRANIER, which are about indeed the ones
50 about himself, Laurent GRANIER understood that anything could happen to him. As Dean

1 TURCHI was threatening him, he was harassing him and he was doing a violation of his apartment
2 with verbal violence, for no reason, Laurent GRANIER preferred to leave at once, nevertheless
3 letting his clothes and his stuff inside, still remaining officially the tenant.

4 Leaving this dangerous place of this friday afternoon, Laurent GRANIER sent a text message to
5 Cynthia HACKLER, lawyer/attorney, who was working yet for Laurent GRANIER about
6 professional documents (contract, etc.), to ask her if she was able to take the case.

7 Cynthia HACKLER agreed, gave few advises like to take an hotel (!), to buy clothes and
8 everything let in the apartment, keeping all receipts.

9 Cynthia HACKLER proposed to Laurent GRANIER to meet her at « her » office, giving the
10 address « 915 Mateo, Ste 201, Los Angeles, CA 90021 ».

11 This afternoon, Laurent GRANIER went to the Police Station, LAPD Hollywood Community
12 Police Station located at 1358 N. Wilcox, Hollywood, CA 90028, and deposited an « investigative
13 report ». But LAPD did nothing.

14 Saturday, Dean TURCHI sent to Laurent GRANIER 36 sms, several emails, and call him twice
15 (letting me messages).

16

17 **FACTS and ACTS about Cynthia HACKLER as attorney/lawyer.**

18

19 Having to leave his apartment quickly, and looking for the location of the police station, Laurent
20 GRANIER sent a text message to Cynthia HACKLER to explain her the situation. Laurent
21 GRANIER knew Cynthia HACKLER to have hired her for business document as NDA, License
22 contract, etc.. He met her via the website « ELANCE.COM ».

23 Cynthia HACKLER confirmed Laurent GRANIER she was able to take his case, and she started
24 to give him few « advises ». The first one was to take a new apartment... She proposed him to meet
25 her at her office as soon as possible, and as it was friday afternoon, for the following monday, so the
26 19th of may 2014. She gave him by text message, her office address « 915 Mateo, Ste 201, Los
27 Angeles, CA 90021 ». All exchange and discussions have been done by text message. She replied to
28 few questions as which range of price the hotel has to be chosen, and she advised to keep all
29 invoices, all bills for all his expenses, hotel, restaurant, clothes, belongings.

30 In no way, in no event, under no circumstances, Cynthia HACKLER really did help Laurent
31 GRANIER.

32 The appointment with her was at 1 pm. Laurent GRANIER spent all his monday morning to go to
33 several official offices to inform, to denounce and to file complaints against Dean TURCHI about
34 his numerous offenses. Laurent GRANIER spent a lot of time, a lot of energy, a lot of money to
35 visit several offices, and most of time, being sent from one to another one. While he wasted energy
36 and time, he asked to Cynthia HACKLER, simply the right address to file complaints to the City of
37 Los Angeles. She replied she did not know...

38 He found by himself, with no advise, no help from Cynthia HACKLER, all city departments
39 concerned by the several frauds made by Dean TURCHI, as « Los Angeles Department of Building
40 and Safety » and « Los Angeles Housing+ community department ».

41 Laurent GRANIER has had to find by himself, alone. He spent so much time that he asked her to
42 postpone their meeting few hours later this monday afternoon.

43 Laurent GRANIER went, tired, to the office of Cynthia HACKLER, at 915 Mateo, Ste 201, Los
44 Angeles.

45 He has had to wait outside because there was no doorbell under her name, there was nothing to
46 warn her he was there. He has had to send her a text message, and she came to open the door.

47 She showed the way to her office. It was an open office with no confidentiality, no privacy,
48 shared with other people of other companies, having other activities than legal.

49 Laurent GRANIER found this, very strange, but at this time, it was not his main worry.

50 Laurent GRANIER has had to tell all the story, giving confidential informations to Cynthia

1 HACKLER, with all this people around them.

2 Laurent GRANIER has clearly explained her the situation and the case, and the main problem,
3 meaning the new insane behaviour of Dean TURCHI. Between friday and monday, Laurent
4 GRANIER sent to Cynthia HACKLER all emails he got from Dean TURCHI, in order to be read
5 and study by her, to find clues about his numerous serious offenses as landlord, but in order too, to
6 prove his strange and dangerous change of behaviour. He sent her too, a summary of the facts.
7 Laurent GRANIER discovered Cynthia HACKLER did not know the case, having not read the
8 emails from Dean TURCHI, even not the summary memo. So, he has had to repeat her everything,
9 and to explain all the offenses. He wanted to sue Dean TURCHI for his several serious criminal
10 offenses. And he wanted too, to ask for a restraining order to get a kind of protection because he
11 was a witness, and because he revealed to FBI the fact that this person had in mind the plan to kill
12 his prior realtor in San Francisco.

13 So, an agreement between Laurent GRANIER and Cynthia HACKLER has been signed, and
14 Laurent GRANIER gave to Cynthia HACKLER a check of \$1500 for restrainer.

15 She had to write and to file a civil complaint to Superior Court, and to ask for a restraining order.

16 It is interesting to mention the fact that Laurent GRANIER asked for this restraining order when
17 he deposited a complaint to LAPD, the 16th of may 2014, request which has not been followed by
18 the officer HALLOCK. It is important to add the fact that this police officer did serious mistakes in
19 his report, about the Laurent GRANIER's identity for whom he kept the address, the occupation, the
20 phone number of the prior plaintiff... Otherwise, this officer never gave the copy of his report,
21 Laurent GRANIER knowing not what he wrote exactly, and so, what is in his complaint ! Anyway,
22 with a false address about the plaintiff, this report can not be followed.

23 The day following, tuesday 20th of may 2014, Laurent GRANIER asked to Cynthia HACKLER
24 to contact LAPD Police station, to contact the Captain and/or the Watch Commander, to warn them
25 about their serious mistakes in the report.

26 She did it, but she asked only for the officer having done the mistake. She has had to call three
27 times in several days to reach him. He changed the errors, but he never sent the new and right one,
28 and most important, he refused to take the copy of the declaration sent to FBI by Laurent
29 GRANIER, being more complete than the one made by this officer. This officer refused to send a
30 copy of his report.

31 From her side, Cynthia HACKLER did nothing else. She never asked officially by written way,
32 the copy of the report. Cynthia HACKLER did not call and warn his superior, the Chief
33 Commander or the Captain.

34 When Laurent GRANIER wanted to file a complaint against LAPD for their bad, strangely
35 protective behaviour which indeed, would have been able to be useful against Dean TURCHI, she
36 explained to Laurent GRANIER it should be without interest. Cynhtia HACKLER's official address
37 is 1905 N. Wilcox Ave, and Hollywood Community Police Station is located at 1358 N. Wilcox...

38 Cynthia HACKLER filed the restraining order the 23rd of may 2014, so one week later the
39 problem with Dean TURCHI. The hearing was for the 16th of june 2014.

40 She took time too, to write the complaint to the Superior Court, and filed it (case 14K07394) the
41 30th of may 2014, for a trial with jury will happen one year and a half later, the 30th of november
42 2015.

43 Just before to file it, the friday afternoon 30th of may, she sent two invoices, one about her work
44 for Dean TURCHI lawsuits, and one about the work she did few months ago, for Laurent
45 GRANIER's professional purposes.

46 These invoices contained numerous excessive claimed points, with no justification, no proof.
47 Yet, Laurent GRANIER found strange the fact she sent simultaneously those unrelated invoices at
48 this inopportune time.

49 Laurent GRANIER got the proof that Cynthia HACKLER was screwing him by her invoices,
50 and by the same time, she was using blackmails to be paid with no disputation.

1 By the same time Laurent GRANIER still asked for their proof and justification, he saw she did
2 again several serious mistakes in the complaint she had to file at the Superior Court. She even
3 refused to change some of her errors, making it not accurate, even deceitful.

4 Later, he discovered she was hiding, or withholding informations and documents, like the
5 procedure to serve notice to the defendant.

6 Because the numerous unsuccessful attempts to serve notice to Dean TURCHI, which led to two
7 postponements of the restraining order hearing, Laurent GRANIER asked Cynthia HACKLER the
8 reasons of these failures. She did not know, even asking Laurent GRANIER if he knew where he
9 should be. Laurent GRANIER discovered she did not hire a professional to do the job, but rather,
10 the free service of the sheriff of Beverly Hills, who is not the closest one to the defendant home.

11 So, Cynthia HACKLER hired a so-called professional company with a hidden
12 owner/responsible, A&G ATTORNEY SERVICES, located at 13089 Peyton Dr Ste C-154 Chino
13 Hills, CA 91709.

14 Dean TURCHI has been served notice after several attempts, the 24th of june 2014, so only one
15 week before the hearing the 02th of july 2014.

16 Laurent GRANIER, having yet no doubt about the dishonesty and the bad faith of Cynthia
17 HACKLER concerning her invoices, had yet doubts about her competence and her professional
18 honesty. His doubts grew more, knowing time was ruling for Dean TURCHI.

19 Laurent GRANIER felt the confirmation of a collusion and/or a corruption by the fact that Dean
20 TURCHI, being informed officially of a restraining order hearing two weeks before it, found
21 quickly a lawyer (with a mexican-sounding name in Santa Monica), and by the fact that the adverse
22 party unlike anyone in this situation, did not ask for a postpone to study the case, like they already
23 knew it very well since a while.

24 With a filed criminal complaint, with a filed civil complaint concerning several serious criminal
25 offenses, and despite the fact that a restraining order in this situation is first, useful, necessary and
26 essential in order to protect an already victim, but also, a witness about criminal behaviours, having
27 deposited a complaint to FBI, and second, not costly and not binding for the defendant's life if he
28 had a normal behaviour, with the fact that his victim left his area, the judge refused to grant this
29 kind of protection to Laurent GRANIER, who has even been sentenced to pay \$500 to the person
30 who victimized him. His doubt about a corruption network were founded, while also, Cynthia
31 HACKLER refused to give him a copy of the judgement. So, Laurent GRANIER knew he was not
32 granted of a protection, he knew he had to pay the adverse party, but with no proof, no official
33 document, and so, no way to appeal.

34 Another proof of collusion, linked with the strangely unjust judgement, has been confirmed with
35 the indecent, insulting and irrelevant proposal given to her by Dean TURCHI's lawyer, Rosario
36 Perry : « Laurent GRANIER should have not to pay the \$500 if he abandons his civil lawsuit », a
37 lawsuit concerning numerous criminal offenses and its several hundreds of thousands dollars of
38 caused damages ».

39 And Cynthia HACKLER asked Laurent GRANIER to pay directly this lawyer, with no official
40 document about it. Laurent GRANIER replied her she had to pay with her own money because she
41 sabotaged the case, or at least with the money of the retainer he gave her . She never replied.

42 Otherwise, he tacitly fired her since a while, according her threat to stop to represent him if he
43 did not pay her invoices with no disputation.

44 Indeed, like Laurent GRANIER confirmed her he was aware of her numerous professional
45 offenses, by the fact she was screwed him since the begining, but also of the fact she deliberately
46 sabotaged, in revenge and in retaliation, the hearing of the restraining order, like by lying to the
47 judge she was not aware where her client was, why he was not present, and when he could come
48 back to Los Angeles, lies sinking the restraining order decision, she wrote him she was withdrawing
49 herself.

50 Laurent GRANIER was travelling since few weeks, to find peace of mind, to erase his concerns,

1 his worries about this unjust unbelievable situation, which led to the discovery of a possible
2 corruption and collusion.

3 He had not to be present for the hearing, having signed his declarations, having filed a complaint
4 to FBI, and by the fact Cynthia HACKLER confirmed him at the beginning she represents him.

5 Indeed, everything was done to avoid the testimony of Laurent GRANIER because Dean
6 TURCHI knew since april that Laurent GRANIER had to travel and to leave Los Angeles area
7 before july, and Cynthia HACKLER asked him to be present just few days before the final hearing,
8 despite the fact she knew her client was travelling in other states, far-off more than 1000 miles,
9 looking for peace of mind to regain his health, in order to work on his projects (he is inventor,
10 master philosopher, theoretician, writer, designer), and despite the fact he explained her the useless
11 of his presence, having done and given all proofs to justify his demand.

12 Despite she knew she was not anymore authorized to represent Laurent GRANIER, despite she
13 was withdrawing herself, despite the fact Dean TURCHI's case did not need any more work before
14 more than one year, she was continuing to represent him illegally and without his agreement, by
15 keeping in touch under hidden ways with the adverse party, having a hidden agenda in order to bill
16 and to edit new fake and unlawful invoices.

17 So, using dissimulation, concealing and omission, she filed a motion (which even contains error
18 and fake declaration) at the Superior Court for a hearing the 11th of september 2014, in order to be
19 relieved as counsel-civil in the lawsuit against Dean TURCHI (case 14K07394). She filled the
20 reason field of the form with a tricky cheat by declaring she wanted to keep confidential, secret her
21 reasons, claiming code articles and even legal precedents to hide the truth. Indeed, she filled this
22 form under fake, false and irrelevant motives, asking even the unrelated, irrelevant and nonsensical
23 request of camera hearing to ascertain her « good faith » about the reasons of her concealing and
24 omission. After to have vainly harassed her client to stop his lawsuits against Dean TURCHI, to
25 have used threats to stop working and to withdraw herself, to have used blackmails, and to have
26 sabotaged the cases to the advantage of Dean TURCHI whom she always called friendly « Dean »,
27 she was diligent to be withdrawn as soon as possible.

28 She even billed lately her spent time and expenses about this useless procedure she wrongly
29 initiated against her client, still under the motive of revenge and reprisals, just two days after
30 Laurent GRANIER sent a complaint about her numerous professional offenses to State Bar
31 President Luis J. RODRIGUEZ (STATE BAR OF CALIFORNIA), and to ATTORNEY CLIENT
32 MEDIATION AND ARBITRATION SERVICES at Los Angeles County Bar Association...

33 Unlike her action about Dean TURCHI notices, Cynthia HACKLER was very efficient and
34 resourceful to serve notice Laurent GRANIER about her motion. She sent him two certified mails,
35 one the 14th of july 2014 (7012 3460 0000 2935 9151) and the other one the 16th of july 2014 (7012
36 3460 0000 2935 9168). The first one contained only three stapled double documents about her
37 motion to be relieved as counsel-civil. The second one contained a mix of unrelated purposes, like a
38 letter explaining with lies about her reasons she was stopping to represent him, a new invoice with
39 no proof of her claimed points, a « notice of client's right to fee arbitration », the same documents,
40 some twice, than the ones of her prior certified mail, about her motion to be relieved as counsel-
41 civil, and an official testimony, under the title of « PROOF of SERVICE ON MOTION » for the
42 « Superior Court of CALIFORNIA », made and signed by Joel LIPMAN, swearing under penalty
43 of perjury he was « not a party to the within action », and certifying the content of the certified mail
44 where it was, the one of the 16th july 2014, and so, by the fact he served those documents to Laurent
45 GRANIER by this same certified mail. His declared address was the one of the Cynthia
46 HACKLER's non declared hidden office, at 915 Mateo St., Los Angeles.

47 Laurent GRANIER sent to Joel LIPMAN, the 12th of august 2014, a certified mail (7013 3020
48 0000 4744 0324) to ask him a confirmation of his independence facing his common address with
49 the party, and by the same time, to demonstrate him his serious involvement for perjury in a
50 criminal offenses case.

1 The certified mail returned to Laurent GRANIER with the postal service motive : « RETURN
2 TO SENDER – ATTEMPTED – NOT KNOWN – UNABLE TO FORWARD ».

3 Indeed, Laurent GRANIER discovered the existence of her hidden useless and illegal work, not
4 because she updated him about their nature, but because she billed them more and more in new
5 unlawful invoices.

6 So, Laurent GRANIER sent her a certified mail (7013 3020 0000 8216 3646) to the address of
7 her non declared hidden real office at 915 Mateo St. She received it the 30th of july 2014. The
8 content and the purpose of his mail were to confirm her again that he constested her invoices, to ask
9 her again proofs and justifications of her invoices, to remember her she was not in charge to
10 represent him since a while, to notice her he was going to sue her for her numerous criminal
11 offenses, and to give her his new address in Campbell, having left Los Angeles since his problems
12 with Dean TURCHI, seeing that neither the authorities, nor she was going to make something to
13 guarantee his safety.

14 She never replied.

15 She just sent an email with a « substitution of attorney-civil » form, to sign in order to relieve her
16 from the record of the civil lawsuit, the same than the one she sent the 07th of july, but with the
17 Laurent GRANIER's new address. And still with the same fraud about the address of the person
18 who has to serve, her official address, with no name.

19 Otherwise, she never sent any real mail.

20 Being master philosopher, Laurent GRANIER gets an acuity to analyze, and so, to detect and to
21 reveal corruption, and especially when it comes to a network, seeing connections between points,
22 like a profiler. He saw the presence of the 3 common mainstreams ruling and motivating corruption
23 in mankind, other than greed and sex, the primary one which leads to cooperation and mutual aid
24 regarding a same nature : religious beliefs (including dogma, obedience, sectarianism, etc.),
25 ethnicity (including race, color, geographical area origin, language, culture, citizenship, etc.),
26 gender (including sexual orientation, body difference, etc.), profession/ occupation. In this case, he
27 saw the Jewish link (Hackler, Lipman, Yeom), the mexican one (TURCHI's illegal worker,
28 TURCHI's sexual partner, TURCHI's lawyer ROSARIO Perry, Hector RODRIGUEZ Inspector at
29 Building and Safety Dept, MARIA Wood and Araceli GONZALES of Los Angeles Housing+
30 community department , Michael VALENZUELA of A&G ATTORNEY SERVICES, State Bar
31 President Luis J. RODRIGUEZ), the homosexual one (Dean TURCHI, his sexual partner, and some
32 of the aforesaid, being as is or sympathizer), and the professional one (legal, lawyer, attorney, etc.)

33 So, the 12th of august 2014, Laurent GRANIER sent a certified mail as formal notice to A&G
34 ATTORNEY SERVICES (7013 3020 0000 4744 2083), Sheriff JOHN L. SCOTT (7013 3020 0000
35 4744 2069) and Deputy KEVIN C. CONNORS (7013 3020 0000 4744 2076) to ask them details
36 about their work, original documents with their certification, and a testimony as they were not a
37 party to the within actions, Dean TURCHI cases, and if they did, or not, know Dean TURCHI
38 before, and their relationship with Cynthia HACKLER.

39 None of them replied, even the A&G ATTORNEY SERVICES to whom Laurent GRANIER
40 asked the name of their hidden legal reponsibles, information they have to disclose, and even not to
41 hide in their official document as their website. Laurent GRANIER understood that something
42 wrongful and unlawful happened and was happening, of course, against him.

43 The same day of the 12th of august 2014, Laurent GRANIER sent to State Bar President Luis J.
44 RODRIGUEZ (7013 3020 0000 4744 0300) and to ATTORNEY CLIENT MEDIATION AND
45 ARBITRATION SERVICES at Los Angeles County Bar Association (7013 3020 0000 4744 0317),
46 a formal notice to warn them about the numerous criminal and professional offenses committed by
47 their member as attorney/lawyer, and to ask them if they approve her misconduct, if they are
48 criminally co-responsible, and jointly and severally financially responsible, and tacitly if they will
49 do something.

50 No one replied officially as they had to do by certified mail.

1 Nothing has been undertaken by those internal profession authorities to stop, or to reframe the
2 criminal professional behaviour of their member. They did not give any real advise, any help, any
3 assistance to Laurent GRANIER, victim of a lawyer facing those serious offenses.

4 Five days later the reception by State Bar President Luis J. RODRIGUEZ, and two days later the
5 reception by ATTORNEY CLIENT MEDIATION AND ARBITRATION SERVICES, so, the 20th of
6 august 2014, as being and knowing be under the protection of the immunity from her professional
7 authorities, Cynthia HACKLER filed a procedure to « Small Claims Court » to be paid of her
8 numerous unlawful invoices, all disputed by Laurent GRANIER, all of them with no proof, no
9 justification. She used lies, fake and wrong declarations, serious omissions leading to deliberate
10 useful misunderstandings and false understandings beneficial to her. She even included and claimed
11 her future expenses for her initiated unlawful and useless motion to be relieved.

12
13 In the end, being already victim of serious criminal offenses, being under dangerous threats by
14 an insane person, being victim of an absolute lack of assistance and help from authorities, and in
15 addition, being foreigner in a country which he does not know much its rules, Laurent GRANIER
16 suffered physically and morally. Being psychologically and emotionally drained by this double
17 injustice, and instead to have help and assistance, in order to regain peace of mind, he has had to
18 face more troubles, more hassle, more problems, about his lawsuits against Dean TURCHI, but also,
19 in addition, he found new ones with the person supposed to protect and to help him.

20 His trust has been destroyed and his situation has been made worse, having to continue his
21 lawsuit alone, but also, to make new ones to avoid to be screwed by his lawyer who deceived him.

22 In addition of his loss and his health problems caused by the adverse party, Laurent GRANIER
23 has had more damages by the fault of his lawyer who has not given him peace of mind, on the
24 contrary. He missed an important international exhibition show in June 2014, in Las Vegas, which
25 was useful to sell licences and softwares about one of his invention (game), a market of several
26 millions.

27 He was so disturbed by the dirty and dishonest behaviours of his lawyer that he has had to travel,
28 to try to find peace of mind. But, instead to regain it, Cynthia HACKLER was continuing to annoy
29 him, to harass him, to cause him more and more damages.

30 So, in addition of this several millions dollars loss of this project which was delayed, Plaintiff
31 was totally disturbed to continue his other one he had to launch, a new technology for movie. His
32 project was to produce the first movie, and for that, he had to write the script. Facing all those
33 troubles, he has had to delay this project too. He lost several months, causing few millions dollars
34 loss and damages.

35 36 37 **FIRST CAUSE OF ACTION**

38 **1. - PROFESSIONAL OFFICE'S ADDRESS FRAUDS**

39 **against Cynthia HACKLER and DOES 1-50**

40 Cynthia HACKLER, as attorney/lawyer has declared her official address at « 1905 N. Wilcox
41 Avenue, Suite 198 Los Angeles, CA 90068 ». This address is not her physical professional address,
42 perhaps her private one. She has not her office at this address and she doesn't practise her profession
43 at this address. Her real and physical office, but hidden and not declared is located at « 915 Mateo,
44 Ste 201, Los Angeles, CA 90021 ».

45 Plaintiff, Laurent GRANIER met her at this address, an open office shared with other persons
46 which are not part, and are totally stranger of her business. There is no privacy, no confidentiality,
47 no guarantee of security against piracy or spying. Otherwise, Laurent GRANIER has the proof she
48 is practising at this address by the certified mail he sent to her (7013 3020 0000 8216 3646),
49 received and signed by her the 30th of July 2014.

50 Any legal profession has to get a physical address.

1 The professional practising any legal occupation like lawyer/attorney has to get a declared
2 physical address linked with his occupation, meaning which has to be mentioned in any official
3 document, as contract, invoice, etc.

4 So, Cynthia HACKLER declared a fake official address.

5 In addition, Cynthia HACKLER is using an illegal hidden address.
6

7 **In conclusion, being against the Law by having declared a fake physical address, Cynthia
8 HACKLER did an OFFENSE of PROFESSIONAL OFFICE'S ADDRESS FRAUD.**

9 **In addition, being against the Law by having not declared her real physical address,
10 Cynthia HACKLER did an OFFENSE PROFESSIONAL OFFICE'S ADDRESS FRAUD.**

11 **In addition, being against the Law by doing two SERIOUS PROFESSIONAL OFFENSES
12 concerning her registration as attorney/lawyer, Cynthia HACKLER is practising illegally a
13 legal occupation.**
14

15 **Defendant used deceits, lies, ruses and omissions to Plaintiff who was her client and who
16 trusted her.**

17 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative.**
18
19

20 **SECOND CAUSE OF ACTION**

21 **2. - LACKS OF RESPECT FOR THE ESSENTIAL PROFESSIONAL OBLIGATIONS** 22 **against Cynthia HACKLER and DOES 1-50**

23 Cynthia HACKLER, as attorney/lawyer has declared her official address at « 1905 N. Wilcox
24 Avenue, Suite 198 Los Angeles, CA 90068 ». This address is not her physical professional address.
25 She has not her office at this address and she doesn't practise her profession at this address. Her real
26 and physical office, but hidden and not declared is located at « 915 Mateo, Ste 201, Los Angeles,
27 CA 90021 ».

28 Cynthia HACKLER's office is an open office shared with other persons which are not part, and are
29 totally stranger of her business. There is no privacy, no confidentiality, no guarantee of security
30 against piracy or spying.
31

32 The professional practising any legal occupation like lawyer/attorney has to give and to guarantee
33 to his client a declared physical address linked with his occupation, in order to meet him and to
34 keep secure documents, guaranteeing confidentiality, secrecy, privacy and secure/safety .
35

36 **In conclusion, being against the Law by using an open shared office with other companies,
37 with persons being not related with her business, her profession, which does not provide and
38 guarantee any confidentiality, secrecy, privacy and secure/safety to her clients, in addition to
39 get an office located at a non declared address, Cynthia HACKLER did several OFFENSES
40 OF LACKS OF RESPECT FOR THE ESSENTIAL PROFESSIONAL OBLIGATIONS.**

41 **In addition, being against the Law by doing SEVERAL SERIOUS PROFESSIONAL
42 OFFENSES by respecting not THE ESSENTIAL PROFESSIONAL OBLIGATIONS, Cynthia
43 HACKLER is practising illegally a legal occupation.**

44 **Defendant used deceits, lies, ruses and omissions to Plaintiff who was her client and who
45 trusted her.**

46 **Defendant did not offer and guarantee to Plaintiff peace of mind by privacy, confidentiality,
47 secrecy and safety of his situation and information.**

48 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative.**
49
50

1 **THIRD CAUSE OF ACTION**

2 **3. - UNLAWFUL INVOICES**

3 **against Cynthia HACKLER and DOES 1-50**

4 Cynthia HACKLER, as attorney/lawyer has declared a fake official address at « 1905 N. Wilcox
5 Avenue, Suite 198 Los Angeles, CA 90068 ». She has not her physical office at this address and she
6 doesn't practise at this address. But she uses this fake declared address to edit invoices to Plaintiff.

7 So, all her invoices are void, and unlawful.

8
9 **In conclusion, being against the Law by using a fake declared professional physical address,**
10 **Cynthia HACKLER did several SERIOUS PROFESSIONAL OFFENSES of EDITING**
11 **UNLAWFUL INVOICES, in addition the fact that the contents of these invoices are not**
12 **justified nor proven, and they are edited under the fact she is practising illegally a legal**
13 **occupation.**

14
15 **Defendant used deceits, lies, ruses and omissions to Plaintiff who was her client and who**
16 **trusted her.**

17 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative.**

18
19
20 **FOURTH CAUSE OF ACTION**

21 **4. - INVOICE FRAUDS**

22 **against Cynthia HACKLER and DOES 1-50**

23 Cynthia HACKLER, as attorney/lawyer has to justify and to prove any claim about the content of
24 her invoices, about her allowed time, and about her expenses too. Cynthia HACKLER has edited
25 several following invoices, containing claims about her passed time on files, and about her
26 expenses. She never provided with any of them, any justification, any proof. Facing their
27 abusiveness, wrongful and deceitful nature, Laurent GRANIER asked to her several times, and each
28 time after their editing, and for each of them, the proof and the justification for each claimed point.

29 Cynthia HACKLER never gave any justification, nor proof, she even never replied but rather, she
30 harassed and she used all ways to oblige Laurent GRANIER to accept them by paying her without
31 any proof, any justification.

32 Cynthia HACKLER lied about the claimed content of her invoices.

33 Even she has been fired by Laurent GRANIER since a while, she continued to edit new invoices
34 based on fake claims and unlawful acts like the maintenance of a relationship with the adverse party
35 under the offense to represent him illegally.

36 Her last act was to file a lawsuit at small claims court in Los Angeles, in order to force Laurent
37 GRANIER to pay her invoices, based on numerous serious criminal offenses like lies, fake
38 declarations, unlawful acts, and to avoid to justify them. Her last act has been done the 20th of
39 august, so just two days after the reception by ATTORNEY CLIENT MEDIATION AND
40 ARBITRATION SERVICES of the certified mail notice sent by Laurent GRANIER...

41
42 **In conclusion, being against the Law by lying about the claimed points of her invoices, by**
43 **doing fake, false and excessive declarations about her expenses and work spent time, by**
44 **continuing to edit new invoices about work she did illegally being not anymore hired and**
45 **having not anymore the right to represent him, by using legal way thanks to fake declarations**
46 **and lies to force her client to pay, and in addition by harassing Laurent GRANIER to pay**
47 **them despite their unlawful nature, Cynthia HACKLER did several SERIOUS**
48 **PROFESSIONAL and CRIMINAL OFFENSES of INVOICE FRAUDS, in addition the fact**
49 **that the contents of these invoices are not justified nor proven, and they are edited under a**
50 **fake declared address, and under the fact she is practising illegally a legal occupation.**

1 Defendant used deceits, lies, ruses, bad faith and omissions against Plaintiff who was her
2 client and who trusted her.

3 Defendant did use and increased the Plaintiff's distress of his situation being already victim
4 of numerous serious criminal offenses.

5 Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to
6 serious troubles in his private and professional life, missing great opportunities, delaying
7 and/or aborting his several projects, in process and/or in development, by disturbing his mind
8 which is his main tool, being inventor, master philosopher, writer, theoretician, designer.
9

10 FIFTH CAUSE OF ACTION

11 5. - EMBEZZLEMENT AND MISAPPROPRIATION OF FUNDS

12 against Cynthia HACKLER and DOES 1-50

13 Cynthia HACKLER, as attorney/lawyer has to deposit any fund, any retainer from her clients on
14 an escrow bank account. She never did it. In addition, she took this money despite the numerous
15 contestations of Laurent GRANIER about her abusiveness, wrongful and deceitful invoices.

16 Laurent GRANIER asked her the proof she put his retainer on an escrow account. She never gave
17 this proof, she even never replied.

18 In addition, Cynthia HACKLER used the same ways (lack of deposit on an escrow bank account,
19 abusiveness, wrongful and deceitful invoices, blackmails) about another retainer Laurent
20 GRANIER gave to her for his business purpose few months earlier. In addition, Cynthia HACKLER
21 owes the refund of the remaining money to Laurent GRANIER but she never refunded him. She
22 never replied.
23
24

25 In conclusion, being against the Law by not having deposited retainers on an escrow bank
26 account, by having taken money without agreement of her client, by ignoring demands of
27 refund made by her client, Cynthia HACKLER did several SERIOUS PROFESSIONAL and
28 CRIMINAL OFFENSES of EMBEZZLEMENT AND MISAPPROPRIATION OF FUNDS, in
29 addition of a deliberate professional misconduct, and she is practising illegally a legal
30 occupation.
31

32 Defendant used deceits, lies, ruses, bad faith and omissions against Plaintiff who was her
33 client and who trusted her.

34 Defendant did use and increased the Plaintiff's distress of his situation being already victim
35 of numerous serious criminal offenses.

36 Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to
37 serious troubles in his private and professional life, missing great opportunities, delaying
38 and/or aborting his several projects, in process and/or in development, by disturbing his mind
39 which is his main tool, being inventor, master philosopher, writer, theoretician, designer.
40
41

42 SIXTH CAUSE OF ACTION

43 6. - BLACKMAILS, THREATS, INTIMIDATIONS, PERSECUTION and INTENTIONAL 44 INFLECTIONS OF EMOTIONAL DISTRESS

45 against Cynthia HACKLER and DOES 1-50

46 Cynthia HACKLER, as attorney/lawyer, sent by emails to Laurent GRANIER her invoices under
47 circumstances of blackmails and threats. Laurent GRANIER asked her, since the beginning, proofs
48 and justifications about the content of her claimed points. Cynthia HACKLER never gave to
49 Laurent GRANIER any proof, any justification, even about her expenses. She even never replied.

50 Cynthia HACKLER sent first, two invoices the same time, mixing the Dean TURCHI's cases,

1 and the one about a prior work which is about Laurent GRANIER's professional purpose (to write
2 contract, NDA, etc.), and for which he had already given to her \$700 as retainer.

3 Cynthia HACKLER sent these invoices, with no reason, simultaneously just before to file the
4 civil lawsuit at the Superior Court against Dean TURCHI. Laurent GRANIER had already given her
5 \$1500 by check to Cynthia HACKLER as retainer, the monday 19th of may 2014, when he met her
6 at her office.

7 Later, as she saw that Laurent GRANIER discovered she was trying to screw him, she changed
8 the delay of contestation from 10 to 5 days without saying it, without asking it.

9 Facing the fact that Laurent GRANIER refused to pay her invoices without any proof, any
10 justification, Cynthia HACKLER used again several ways of blackmails, like direct threats as not to
11 go to the hearing for the restraining order, and indirectly by botching her work, and worse by
12 sabotaging the cases. Cynthia HACKLER acted the implementation of her threats, consequences of
13 the non compliance of her blackmails, by withholding information, by hidding information, by
14 withholding documents, by hidding documents, by hidding acts, by forgetting update, by hidding
15 discussion and negotiation with adverse party, by doing collusion with adverse party, by letting
16 time to the adverse party, by increasing fake claimed points in new invoices, by continuing to edit
17 invoices for work she was not anymore in charge, by continuing to represent illegally Laurent
18 GRANIER, by continuing to discuss with adverse party, by harassing Laurent GRANIER, by
19 causing more damages on his life, by persecuting him by creating more hassle, more troubles, by
20 filing an useless and unlawful motion to the Court to be withdrawn of the case upon fake claims and
21 lies, by doing acts of intimidation by asking a filming of this motion hoping the truth should not be
22 revealed by the fact Laurent GRANIER will refuse to be present (using the fact he is foreigner and
23 so he should not be comfortable facing a situation he is not used, and in difficulty facing a
24 procedure he has not the knowledge how it works and by the fact of using a language in which he is
25 not fluent), by having filed a small claims process to oblige Laurent GRANIER to pay her
26 abusiveness, wrongful, deceitful and unlawful invoices without giving any proof nor justification,
27 by adding new invoices including her contacts with the adverse party despite the fact she knew she
28 was not representing Laurent GRANIER anymore, she knew she was fired since a while, by
29 including her fees for the double motion she unlawfully and wrongly instigated to be withdrawn as
30 representing Laurent GRANIER.

31
32 **In conclusion, being against the Law by using tricks and cheats thanks to the power and the**
33 **cover of her profession, her situation and her position, in order, first, to force Laurent**
34 **GRANIER to accept to pay her abusiveness, wrongful, deceitful and unlawful invoices**
35 **without disputation, and second, to commit acts of revenge by carrying out her threats, and**
36 **even above and them, Cynthia HACKLER did SERIOUS CRIMINAL OFFENSES of**
37 **BLACKMAILS, THREATS, INTIMIDATIONS, PERSECUTION and INTENTIONAL**
38 **INFLECTIONS OF EMOTIONAL DISTRESS, in addition of a deliberate professional**
39 **misconduct.**

40
41 **Defendant used deceptions, lies, ruses, bad faith and omissions against Plaintiff who was her**
42 **client and who trusted her.**

43 **Defendant did use and increased the Plaintiff's distress of his situation being already victim**
44 **of numerous serious criminal offenses.**

45 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
46 **serious troubles in his private and professional life, missing great opportunities, delaying**
47 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
48 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

1 **SEVENTH CAUSE OF ACTION**
2 **7. - DELIBERATE OBSTRUCTION OF JUSTICE**
3 **against Cynthia HACKLER and DOES 1-50**

4 Cynthia HACKLER, as attorney/lawyer, representing Laurent GRANIER being victim of
5 numerous serious criminal offenses like scam, robbery, discrimination, sexual harassment, sexual
6 behaviour, lies, fake declarations made by Dean TURCHI, has always refused to do what Laurent
7 GRANIER asked her in order to fill out, to enrich, to support, to document his files, his lawsuits
8 against Dean TURCHI. She refused to ask to LAPD a copy of the report, she refused to deposit to
9 LAPD a new report with more essential information, she refused to contact the Chief Commander
10 or the Captain of LAPD station in order to push the case under a criminal lawsuit by informing the
11 prosecutor of its existence, she refused to write to « craigslist » to get the copy of the ad posted by
12 Dean TURCHI about his rental « offer », she refused to contact TURCHI's neighborhood to find
13 witness of his disrespectful behaviour, she refused to read TURCHI's emails, she refused to read the
14 summary of the case written by her client, she did not inform her client about everything, she did
15 not inform her client about her discussion with teh adverse party, she did not give all documents to
16 her client, she refused to find and to take an expert to analyze the content of the emails written by
17 Dean TURCHI which was useful for the civil lawsuit, and for the restraining order process too, in
18 order to show his lies, his real motives, his purposes and his change of behaviour and his new step
19 of dangerousness.

20 Cynthia HACKLER did not do everything to render understandable the necessity and the
21 usefulness of a restraining order to protect her client, at the court, and to the police too, she refused
22 to do some important changes in the two filed lawsuits despite the demand of her client.

23 Cynthia HACKLER did not do everything to get the protection granted as soon as possible, she
24 lied by telling to Laurent GRANIER she was able to represent him at the court, meaning he had not
25 to be present. She did not everything to serve notice as soon as possible in order to get the
26 restraining order before the end of the rental.

27 Cynthia HACKLER did not explain to the judge the real purpose and the necessity of the
28 restraining order, she even did not explain why her client can not be present, she did not explain the
29 useless of his presence, she even did not ask to postpone the hearing. She even lied to the judge in
30 revenge, in order to cause more damages to her client, by saying she was not aware where he was.

31 Cynthia HACKLER never wrote to Dean TURCHI to inform him she was in charge to represent
32 Laurent GRANIER.

33 Cynthia HACKLER has never protected the interest of Laurent GRANIER, she even did not help
34 him to get back his belongings let in the apartment, and she did not care to do the check out of the
35 rental.

36
37 **In conclusion, being against the Law by refusing to do everything useful to increase the**
38 **benefit of the files of Laurent GRANIER, by refusing to do everything essential asked by him,**
39 **by refusing to do everything to protect and save his interest, by having a behaviour of doing**
40 **and/or not doing some things which went against his interest, by lying to the judge for the**
41 **restaining order, in addition of an absolute lack of advise, help and assistance, Cynthia**
42 **HACKLER did several SERIOUS PROFESSIONAL OFFENSES of DELIBERATE**
43 **OBSTRUCTION OF JUSTICE.**

44
45 **Defendant used deceits, lies, ruses, bad faith and omissions against Plaintiff who was her**
46 **client and who trusted her.**

47 **Defendant increased the Plaintiff's distress of his situation being already victim of**
48 **numerous serious criminal offenses.**

49 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
50 **serious troubles in his private and professional life, missing great opportunities, delaying**

1 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
2 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

3
4
5 **EIGHT CAUSE OF ACTION**

6 **8. - WITHHOLDING OF INFORMATION**

7 **against Cynthia HACKLER and DOES 1-50**

8 Cynthia HACKLER, as attorney/lawyer, representing Laurent GRANIER as victim, plaintiff, has
9 never given to Laurent GRANIER any essential information like the content of her discussion with
10 the adverse party and the persons involved in this case. She even never noticed Laurent GRANIER
11 about their existence, but only later, indirectly by the fact she billed her spent time.

12 She never informed on time which, when, how and who was in charge to serve both notices.

13 Laurent GRANIER asked several times but she never replied, she never gave any information.

14
15 **In conclusion, being against the Law by not giving all information to her client, by even**
16 **ignoring his requests, Cynthia HACKLER did several SERIOUS PROFESSIONAL**
17 **OFFENSES of WITHHOLDING OF INFORMATION, in addition of a deliberate**
18 **professional misconduct.**

19
20 **Defendant used deceits, lies, ruses, bad faith and omissions against Plaintiff who was her**
21 **client and who trusted her.**

22 **Defendant increased the Plaintiff's distress of his situation being already victim of**
23 **numerous serious criminal offenses.**

24 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
25 **serious troubles in his private and professional life, missing great opportunities, delaying**
26 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
27 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

28
29
30 **NINTH CAUSE OF ACTION**

31 **9. - WITHHOLDING OF DOCUMENTS**

32 **against Cynthia HACKLER and DOES 1-50**

33 Cynthia HACKLER, as attorney/lawyer, representing Laurent GRANIER as victim, plaintiff, has
34 never given to Laurent GRANIER any essential documents like the decisions made by the judge
35 concerning the several hearings delayed 2 times, about the restraining order he was asking for, and
36 she even did not give the most important one, the final judgement declaring the refusal of
37 restraining order.

38 She never gave documents concerning which, when, how and who was in charge to serve both
39 notices, proof of served notices, nor bills and receipts.

40 Laurent GRANIER asked several times but she never replied, she never gave anything.

41
42 **In conclusion, being against the Law by not giving all documents to her client, by even**
43 **ignoring his requests, Cynthia HACKLER did several SERIOUS PROFESSIONAL**
44 **OFFENSES of WITHHOLDING OF DOCUMENTS, in addition of a deliberate professional**
45 **misconduct.**

46
47 **Defendant used deceits, lies, ruses, bad faith and omission against Plaintiff who was her**
48 **client and who trusted her.**

49 **Defendant increased the Plaintiff's distress of his situation being already victim of**
50 **numerous serious criminal offenses.**

1 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
2 **serious troubles in his private and professional life, missing great opportunities, delaying**
3 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
4 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

5
6
7 **TENTH CAUSE OF ACTION**

8 **10. - LACKS OF LEGAL KNOWLEDGE**

9 **against Cynthia HACKLER and DOES 1-50**

10 Cynthia HACKLER, as attorney/lawyer, has been hired by Laurent GRANIER to represent him
11 for two lawsuits as victim, plaintiff, one about a restraining order that Laurent GRANIER asked
12 against Dean TURCHI, and one about a civil one to sue Dean TURCHI about the damages he
13 caused by his numerous criminal offenses.

14 She did not know what is the process to file a restraining order. Cynthia HACKLER, as
15 attorney/lawyer knowing tacitly her profession, billed Laurent GRANIER her spent time to learn
16 how to fill, to proceed and to file a restraining order at the court. She even learnt badly and poorly
17 because she did mistakes, happy mistakes, useful for her like to bill « wrongly » twice for its
18 registration at the court.

19 Cynthia HACKLER, as attorney/lawyer, representing Laurent GRANIER as victim, as plaintiff
20 has never given to Laurent GRANIER any real positive advise but her persistent refusals.

21
22 **In conclusion, being against the Law by lying about her professional knowledge, by billing**
23 **the spent time to learn what she is supposed to know in her profession, by giving no advise,**
24 **nor assistance, nor help to her client, Cynthia HACKLER did several SERIOUS**
25 **PROFESSIONAL OFFENSES of LACKS OF LEGAL KNOWLEDGE, in addition of a**
26 **deliberate professional misconduct.**

27
28 **Defendant used lies and omissions to Plaintiff who was her client and who trusted her.**

29 **Defendant increased the Plaintiff's distress of his situation being already victim of**
30 **numerous serious criminal offenses.**

31 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
32 **serious troubles in his private and professional life, missing great opportunities, delaying**
33 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
34 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

35
36
37 **ELEVENTH CAUSE OF ACTION**

38 **11. - LACK OF STUDY THE CASE**

39 **against Cynthia HACKLER and DOES 1-50**

40 Cynthia HACKLER, as attorney/lawyer, has been hired by Laurent GRANIER to represent him
41 for two lawsuits as victim, plaintiff, one about a restraining order that Laurent GRANIER asked
42 against Dean TURCHI, and one about a civil one to sue Dean TURCHI about the damages he
43 caused by his numerous criminal offenses.

44 Cynthia HACKLER, as attorney/lawyer, did not know the case, despite the fact that Laurent
45 GRANIER sent her, the weekend before his meeting with her, all emails from Dean TURCHI, and a
46 complete summary of the case, of the story, including all points, all offenses, all dates, all related
47 proofs. Laurent GRANIER did his best to make her work, her understanding easier.

48 Her questions to Laurent GRANIER during the meeting, her numerous serious mistakes in her
49 work, lawsuit documents to file at Cour, and her other questions by email, showed to Laurent
50 GRANIER she did not know the case, worse, she never read the content of the emails, nor the

1 summary. Indeed, all answers about her questions were in the summary, and in the Dean TURCHI's
2 emails. She even refused to change some points despite the will of her client.

3 Cynthia HACKLER, as attorney/lawyer, representing Laurent GRANIER caused him new and
4 more damages by the hassle, troubles and worries she did by her dishonest behaviour.
5

6 **In conclusion, being against the Law by not studying documents of the case, by even**
7 **ignoring them, leading to serious mistakes and misunderstandings, Cynthia HACKLER did**
8 **the SERIOUS PROFESSIONAL OFFENSE of LACK OF STUDY THE CASE, in addition of**
9 **a deliberate professional misconduct.**
10

11 **Defendant used lies and bad faith to Plaintiff who was her client and who trusted her.**

12 **Defendant increased the Plaintiff's distress of his situation being already victim of**
13 **numerous serious criminal offenses.**

14 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
15 **serious troubles in his private and professional life, missing great opportunities, delaying**
16 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
17 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**
18

19 **TWELFTH CAUSE OF ACTION**

20 **12. - CORRUPTION, COLLUSION, CHEATING, LIES, SCAMS, BAD FAITH, PERJURY,** 21 **USE OF FAKE WITNESS**

22 **against Cynthia HACKLER and DOES 1-50**

23
24 Cynthia HACKLER has been hired by Laurent GRANIER for two lawsuits against Dean
25 TURCHI, one about a restraining order that Laurent GRANIER asked for in order to get a kind of
26 protection, and one civil in order to defend his interests and to claim for damages caused by the
27 numerous criminal offenses he suffered from the adverse party.
28

29 **CORRUPTION, COLLUSION, CHEATING, LIES, SCAMS,**

30 Corruption phenomenon is not only an exchange of money, a payment for a « service ». Most of
31 time, it is under the hidden shape of an advantage in nature, in exchange, in return for another
32 service, or a compliance, an obedience to a membership privilege.

33 Cynthia HACKLER helped the adverse party by not using everything against it, by not using and
34 telling the truth in order to grant her client a restraining order, so much so the judge refused it,
35 believing it was only about his harassment.

36 In addition to have deliberately misquoted the purpose of the restraining order to the judge,
37 which was harmful and definitive to the adverse party, Cynthia HACKLER lied to the judge about
38 the motive of the absence of Laurent GRANIER for the hearing, even refusing to tell to the judge
39 the claims of her client.

40 She refused to help Laurent GRANIER when he asked her to find an expert to analyze the
41 content of Dean TURCHI's emails, replying it was useless. But, the purpose of the restraining order
42 was to get a kind of protection from an insane person, so, showing and proving his mental
43 instability and illness was essential.

44 She refused to ask to « craigslist » the copy of the ad posted by adverse party, proving the terms
45 of the rental, useful for both procedures to show his lies and his bad faith.

46 She refused to do some changes that Laurent GRANIER wanted to do in the declarations for the
47 restraining order and the civil lawsuit.

48 She did and hid discussions with the adverse party without speaking about it with her client, and
49 she did it even when she was not anymore her legal representative.

50 Cynthia HACKLER asked several times to give up his civil lawsuit.

1 Otherwise, for her own purposes, Cynthia HACKLER showed a great energy to use her legal
2 knowledge and her connections to find all possible ways to oblige Laurent GRANIER to accept her
3 invoices without giving any proof and justification.

4 Cynthia HACKLER filed a motion to be withdrawn despite the fact she was not anymore hired.

6 **PERJURY, USE OF FAKE WITNESS,**

7 To notice Laurent GRANIER about this motion, she sent him two certified mails. One of them
8 has been done by a witness certifying the content of the certified mail. Cynthia HACKLER used a
9 person named Joel LIPMAN, who declared « to be not a party to the within action ».

10 His address is the same than her hidden one, at « 915 Mateo, Los Angeles, CA 90021 ».

11 The certified mail sent by Laurent GRANIER to Joel LIPMAN at his declared address returned to
12 Laurent GRANIER with the mention « « RETURN TO SENDER – ATTEMPTED – NOT KNOWN
13 – UNABLE TO FORWARD ».

14 The witness used by Cynthia HACKLER is a fake witness, or at least, a party of the defendant.

16 **BAD FAITH,**

17 Her last act was to do a legal procedure to be freed from Laurent GRANIER's contract.

18 But, Cynthia HACKLER knew yet she was not anymore her representantative. The proof is given
19 by herself, just after her failure for the restraining order, by telling him to contact directly the
20 adverse party, Dean TURCHI's lawyer and Judy BARNELL from North Light Insurance.

21 Cynthia HACKLER never gave to Laurent GRANIER any essential documents like the decision
22 done by the judge concerning the restraining order which has been postponed twice.

23 She never gave the proof of served notice to adverse party, nor bills and receipts.

24 Laurent GRANIER asked her several times but she never replied, she never gave anything.

25 Following this, Laurent GRANIER sent to her hidden and not declared address a certified mail to
26 ask again proofs and justifications about her invoices, but too, to confirm her she was not his
27 representant, his lawyer, since a while.

28 Cynthia HACKLER received it, but never replied.

29 She just sent him an email with an attached document to remove her from the civil lawsuit
30 against Dean TURCHI. Nothing else.

32 Laurent GRANIER contacted several persons involved in the lawsuits against Dean TURCHI,
33 persons involved by Cynthia HACKLER. The purpose of those certified mails was to understand
34 their involvement, their act and their presence in this case, to get their testimony and their
35 explanation about strange situations, in order to find, to definite a possible corruption network
36 between her and one or several of them.

37 Laurent GRANIER sent a certified mail the 12th of august 2014 to Sheriff JOHN L. SCOTT,
38 Deputy KEVIN C. CONNORS, A&G -Attorney Services, Joel LIPMAN.

39 None of them replied.

40 Laurent GRANIER sent too, the same day, a certified mail to State Bar President Luis J.
41 RODRIGUEZ, and to ATTORNEY CLIENT MEDIATION AND ARBITRATION SERVICES.

42 Few days later their reception, Cynthia HACKLER filed a small claims procedure at the court in
43 order to oblige Laurent GRANIER to pay her invoices with no justifications, nor proofs. For that,
44 she did fake declarations, and lied.

46 **In conclusion, being against the Law by giving leeways to adverse party, in time and in
47 missing information, by not giving all information to her client, by ignoring his requests, by
48 hiding facts, documents and discussions, by doing tirelessly invoices based on fake and
49 dclarations and lies, by using a fake witness, by using a witness who lied, Cynthia HACKLER
50 did SERIOUS CRIMINAL OFFENSES of CORRUPTION, COLLUSION, CHEATING,**

1 **LIES, SCAMS, BAD FAITH, PERJURY, USE OF FAKE WITNESS.**

2
3 **Defendant used deceits, lies, ruses, bad faith and omissions against Plaintiff who was her**
4 **client and who trusted her.**

5 **Defendant did use and increased the Plaintiff's distress of his situation being already victim**
6 **of numerous serious criminal offenses.**

7 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
8 **serious troubles in his private and professional life, missing great opportunities, delaying**
9 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
10 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

11
12
13 **THIRTEENTH CAUSE OF ACTION**

14 **13. - DELIBERATE NEGLIGENCES**

15 **against Cynthia HACKLER and DOES 1-50**

16 Cynthia HACKLER did nothing to help, to assist or to take care of her client to get back his
17 belongings.

18 Laurent GRANIER lost everything he let in his apartment, forced to leave it for safety measure,
19 while facing the insane behaviour of his landlord. He lost all his belongings, his clothes, his shoes,
20 his underwears, his private documents, his food, his meds, his toiletries, and his important and
21 confidential professional documents. Laurent GRANIER was not able to go to an important
22 exhibition in Las Vegas and so, he even lost great opportunities and money.

23 Cynthia HACKLER who has even told to Laurent GRANIER to buy everything missing and to
24 keep all receipt to ask their refund. never used and never asked Laurent GRANIER any of those
25 expenses.

26 Cynthia HACKLER never contacted Dean TURCHI in order to inform him she was representing
27 Laurent GRANIER.

28 Cynthia HACKLER never took care and helped Laurent GRANIER to carry out the check out of
29 his apartment at the end of the official term of rental, the 07th of june 2014, nevertheless she knew
30 the serious problem of dangerousness of the landlord, and the pending restraining order procedure.
31 So, her negligences caused big damages because Dean TURCHI was unable to contact directly
32 Laurent GRANIER anymore, being yet accused of harassment, and Laurent GRANIER did not
33 want to go back to his apartment because of the hazardous problems with the landlord living there.

34
35 **In conclusion, being against the Law by not informing the adverse party of her involvement**
36 **as attorney/lawyer representing her client Laurent GRANIER, despite the fact she asked**
37 **Laurent GRANIER not to answer from possible contacts by the landlord, by not helping**
38 **Laurent GRANIER to get back his belongings, by not giving him to proceed the check out of**
39 **the rental, Cynthia HACKLER did several SERIOUS PROFESSIONAL OFFENSES of**
40 **DELIBERATE NEGLIGENCES.**

41
42 **Defendant used deceits, lies, ruses, bad faith and omissions to Plaintiff who was her client**
43 **and who trusted her.**

44 **Defendant did use and increased the Plaintiff's distress of his situation being already victim**
45 **of numerous serious criminal offenses.**

46 **Plaintiff lost all his private and professional belongings.**

47 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
48 **serious troubles in his private and professional life, missing great opportunities, delaying**
49 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
50 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

1 **FOURTEENTH CAUSE OF ACTION**
2 **14. - DELIBERATE MALPRACTICES**
3 **against Cynthia HACKLER and DOES 1-50**

4 Cynthia HACKLER, as attorney/lawyer, represented officially Laurent GRANIER for a
5 restraining order he asked against Dean TURCHI.

6 Cynthia HACKLER refused to write some informations, to do some important change in the
7 declaration form she wrote, despite the will of her client.

8 Cynhtia HACKLER did not everything to serve notice as soon as possible, letting to Dean
9 TURCHI all time to reply, time going against her client who can not stay in Los Angeles, and not
10 having peace of mind.

11 She did wrong and fake declarations to the judge, and the last one was for the final hearing,
12 where Laurent GRANIER can not be there, by declaring she had not the knowledge where he was,
13 when he will come back to Los Angeles, by not claiming the useless of his presence as already
14 victim, and worse, by not asking to postpone the hearing if needed. She did deliberately give wrong
15 information to the judge who declared accepting the hearing and not postponing it, which led him to
16 refuse the restraining order, and even sentenced Laurent GRANIER to pay \$500. This is according
17 the own declarations of Cynthia HACKLER who has never given the official document of the
18 decision to her client.

19 Cynthia HACKLER never helped Laurent GRANIER to proceed and to get from the judge the
20 restraining order as soon as possible, in order to get a kind of protection for her client.

21
22 **In conclusion, being against the Law by not giving all information and the truth to a judge,**
23 **by not helping her client to grant him a protection in a hazardous situation, Cynthia**
24 **HACKLER did several SERIOUS PROFESSIONAL CRIMINAL OFFENSES of**
25 **DELIBERATE MALPRACTICES.**

26
27 **Defendant used deceits, lies, ruses, bad faith and omissions against Plaintiff who was her**
28 **client and who trusted her.**

29 **Defendant increased the Plaintiff's distress of his situation being already victim of**
30 **numerous serious criminal offenses.**

31 **Plaintiff lost his restraining order procedure which could help for his safety.**

32 **Plaintiff lost \$500 to pay to the person who caused him damages.**

33 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
34 **serious troubles in his private and professional life, missing great opportunities, delaying**
35 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
36 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

37
38
39 **FIFTEENTH CAUSE OF ACTION**
40 **15. - PROFITABLE AND USEFUL PASSIVE COMPLICITY WITH THE ADVERSE**
41 **PARTY**

42 **against Cynthia HACKLER and DOES 1-50**

43 Cynthia HACKLER, by her deliberate negligences and malpractices, helped passively the
44 adverse party, Dean TURCHI she always friendly called by his first name. And by the same time,
45 she caused more damages on her real client, Laurent GRANIER.

46 Laurent GRANIER saw her backstabbing behaviour. Being already victim of serious criminal
47 offenses, being under dangerous threats by an insane person, being victim of an absolute lack of
48 assistance and help from authorities, so suffering physically and morally, being psychologically and
49 emotionally drained, caused by this double injustice, and instead to have help and assistance from
50 Cynthia HACKLER in order to regain peace of mind after this unjust situation, Laurent GRANIER

1 had to face more troubles, more hassle, more problems about his lawsuits against Dean TURCHI,
2 by the fault of the person he paid to protect his interest.

3
4 **In conclusion, being against the Law by deliberately not doing the right things against the**
5 **adverse party, which led to ways against her own client, Cynthia HACKLER did SERIOUS**
6 **PROFESSIONAL CRIMINAL OFFENSES of PROFITABLE AND USEFUL PASSIVE**
7 **COMPLICITY WITH THE ADVERSE PARTY, in addition of a deliberate professional**
8 **misconduct.**

9
10 **Defendant used deceits, lies, ruses, bad faith and omissions against Plaintiff who was her**
11 **client and who trusted her.**

12 **Defendant increased the Plaintiff's distress of his situation being already victim of**
13 **numerous serious criminal offenses.**

14 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
15 **serious troubles in his private and professional life, missing great opportunities, delaying**
16 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
17 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

18
19
20 **SIXTEENTH CAUSE OF ACTION**

21 **16. - HARASSMENT TO GIVE UP LAWSUITS AGAINST THE ADVERSE PARTY**
22 **against Cynthia HACKLER and DOES 1-50**

23 Cynthia HACKLER, as attorney/lawyer, hired by Laurent GRANIER being victim of numerous
24 serious criminal offenses like scam, robbery, discrimination, sexual harassment, sexual behaviour,
25 lies, fake declarations made by Dean TURCHI, in order to defend his interest and to obtain
26 compensations for the damages he suffered, asked several times, even harassed her client to stop, to
27 give up, to abandon the lawsuits against Dean TURCHI. With absolute no reason.

28 Otherwise, Cynthia HACKLER always named maliciously the adverse party « Dean », in order to
29 annoy her client. Despite his remarks to her, she was continuing to call him by his first name.

30
31 **In conclusion, being against the Law by asking, by harassing her client to abandon, to give**
32 **up his lawsuits against an adverse party who caused him considerable damages by its**
33 **numerous serious criminal offenses like scam, robbery, discrimination, sexual harassment,**
34 **sexual behaviour, lies, fake declarations, Cynthia HACKLER did several SERIOUS**
35 **PROFESSIONAL OFFENSES of HARASSMENT TO GIVE UP LAWSUITS AGAINST THE**
36 **ADVERSE PARTY.**

37
38 **Defendant used ruses and bad faith to Plaintiff who was her client and who trusted her.**

39 **Defendant did use and increased the Plaintiff's distress of his situation being already victim**
40 **of numerous serious criminal offenses.**

41 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
42 **serious troubles in his private and professional life, missing great opportunities, delaying**
43 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
44 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

45
46
47 **SEVENTEENTH CAUSE OF ACTION**

48 **17. - UNLAWFUL PRACTICE OF THE PROFESSION OF LAWYER**
49 **against Cynthia HACKLER and DOES 1-50**

50 Cynthia HACKLER, as attorney/lawyer declared her official address at « 1905 N. Wilcox

1 Avenue, Suite 198 Los Angeles, CA 90068 » which is a fake one, not being her physical
2 professional address. She has not her office at this address and she doesn't practise her profession at
3 this address. Her real and physical office, hidden and not declared, is located at « 915 Mateo, Ste
4 201, Los Angeles, CA 90021 ». In addition, her office is an open office shared with other persons,
5 others companies being not linked with her business, her occupation, her profession.

6 Her official registration at Bar of California as lawyer is based on fake and wrong declarations,
7 missing information, lies and omission, and so, is unlawful, and void,
8

9 **In conclusion, being against the Law by being wrongly registred as lawyer on false**
10 **information, Cynthia HACKLER did the OFFENSE of UNLAWFUL PRACTICE OF THE**
11 **PROFESSION OF LAWYER.**

12
13 **Defendant used deceits, lies, ruses, bad faith and omissions to Plaintiff who was her client**
14 **and who trusted her.**

15 **Defendant increased the Plaintiff's distress of his situation being already victim of**
16 **numerous serious criminal offenses.**

17 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
18 **serious troubles in his private and professional life, missing great opportunities, delaying**
19 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
20 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

21 22 23 **EIGHTEENTH CAUSE OF ACTION**

24 **18. - IMPOSTURE**

25 **against Cynthia HACKLER and DOES 1-50**

26 Cynthia HACKLER used several times blackmails against Laurent GRANIER as not to continue
27 to represent him if he did not pay her excessive, wrongful, deceitful and unlawful invoices without
28 giving any proof nor justification. Laurent GRANIER did never give up, and did never pay nor
29 accept the content of her invoices. So, according her threat, she was not anymore his
30 lawyer/attorney, and let alone his legal and authorized representative.

31 In addition, Laurent GRANIER's words were understandable when he wrote her she was not able
32 to represent him anymore while he saw she was using bad faith and lies.

33 Otherwise, Cynthia HACKLER confirmed him by two emails the fact she was withdrawing
34 herself from his cases.

35 The main proof that Cynthia HACKLER had the knowledge that Laurent GRANIER did not
36 consider anymore her as his lawyer/attorney, his representative, and she did as such, is by the fact
37 she wrote him emails where she was confirming she was withdrawing herself (in fact she was yet
38 fired at this time), and so, he had to contact directly the representatives of the adverse party. First,
39 Dean TURCHI's lawyer, Rosario PERRY, and second, Judy BARNELL, a person working for North
40 Light Insurance who contacted lately her in behalf of Dean TURCHI in order to find a settlement
41 out of court. If Cynthia HACKLER wrote this, it is because she was not anymore authorized by
42 Laurent GRANIER to represent him. But, she was continuing to bill Laurent GRANIER for her
43 fake and unauthorized work, a work of which he was not even aware of its existence.

44 In addition, following the strange procedure made by Cynthia HACKLER against Laurent
45 GRANIER, a motion to be withdrawn from the case, being to be judged the 11th of september 2014,
46 Laurent GRANIER sent a certified mail to Cynthia HACKLER at her hidden address to confirm her
47 again, she was not his representant since a while, since he discovered she was screwing him by her
48 excessive, wrongful, deceitful and unlawful invoices without giving any proof nor justification, and
49 since she was betraying him by helping Dean TURCHI, whom she called in a friendly way,
50 « Dean ».

1 Despite of this formal notice, this confirmation, Cynthia HACKLER continued to discuss with
2 the adverse party, and to bill Laurent GRANIER.

3
4 **In conclusion, being against the Law by billing her former client for work she was not**
5 **authorized to do, by continuing to represent a former client, without his authorization, by**
6 **doing two serious PROFESSIONAL OFFENSES concerning her registration leading to the**
7 **nullity of her official registration as lawyer, and so, by practising illegally a legal profession**
8 **and occupation, Cynthia HACKLER did the OFFENSE of IMPOSTURE.**

9
10 **Defendant used deceits, lies, ruses, bad faith and omissions against Plaintiff who was her**
11 **client and who trusted her.**

12 **Defendant did use and increased the Plaintiff's distress of his situation being already victim**
13 **of numerous serious criminal offenses.**

14 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
15 **serious troubles in his private and professional life, missing great opportunities, delaying**
16 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
17 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

18
19
20 **NINETEENTH CAUSE OF ACTION**
21 **19. - BREACHES OF CONTRACT**
22 **against Cynthia HACKLER and DOES 1-50**

23 Cynthia HACKLER, as attorney/lawyer has been hired by Laurent GRANIER to represent him as
24 victim for two lawsuits.

25 She lied about her knowledge in legal, she lied about her registration as lawyer, she lied about her
26 ability to help, to assist, to defend his interest, she did not help him, she did non act for the help of
27 her client which caused him more damages, she did not the right things for her client, she betrayed
28 him by not doing the right things against the adverse party which caused him more damages, she
29 screwed him with her invoices.

30 She broke the trust of her client.

31 She did a lot of serious professional offenses, and several ones deliberately.

32 So, each of ones is a breach of her contract with her client.

33
34 **In conclusion, being against the Law by numerous doing professional offenses, offenses of**
35 **professional office's address frauds, lacks of respect for the essential professional obligations,**
36 **unlawful invoices, invoice frauds, embezzlement and misappropriation of funds, blackmails**
37 **and threats, deliberate obstruction of justice, withholding of information, withholding of**
38 **documents, lacks of legal knowledge, lacks of study the case, corruption, collusion, cheating,**
39 **lies, scams, bad faith, perjury, use of fake witness, deliberate negligences, deliberate**
40 **malpractices, profitable and useful passive complicity with the defendent, harassment to give**
41 **up lawsuits against the defendant, unlawful practice of the profession of lawyer, imposture, by**
42 **not respecting the terms, written and tacit, of the contract with her client, Cynthia**
43 **HACKLER she did BREACHES OF CONTRACT, in addition the fact she took advantage of**
44 **her legal knowledge compared with her client.**

45
46 **Defendant used deceits, lies, ruses, bad faith and omissions to Plaintiff who was her client**
47 **and who trusted her.**

48 **Defendant did use and increased the Plaintiff's distress of his situation being already victim**
49 **of numerous serious criminal offenses.**

50 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**

1 serious troubles in his private and professional life, missing great opportunities, delaying
2 and/or aborting his several projects, in process and/or in development, by disturbing his mind
3 which is his main tool, being inventor, master philosopher, writer, theoretician, designer.
4

5 6 TWENTIETH CAUSE OF ACTION

7 20. - FAULT OF VALIDATION, REGISTRATION AND ACCREDITATION.

8 against THE STATE BAR OF CALIFORNIA, Luis J. RODRIGUEZ, and DOES 1-50

9 Cynthia HACKLER has been accepted and officially registered as lawyer by THE STATE BAR
10 OF CALIFORNIA to practice law.

11 She became member.

12 She did declared a fake official address and did not declared her real office's address.

13 In addition, the office she was using to practice law is not a real one, being shared with other
14 persons unrelated with her occupation.
15

16 STATE BAR of CALIFORNIA has strict rules, and duties too, published on their website :

17 « To practice law in California, applicants must pass the California Bar Examination and pay
18 their annual membership fees to the State Bar of California »

19 « A unified, or integrated bar, means simply that membership is mandatory for all attorneys who
20 are licensed to practice law in the state »

21 « State Bar of California has shaped the development of the law, regulated the professional
22 conduct of the state's lawyers and provided greater access to legal services for all citizens. »

23 « The bar's programs are financed primarily by fees paid by attorneys and applicants to practice
24 law. In 2011, the bar's general fund budget was more than \$64 million, over 75 percent of which
25 funded the bar's attorney disciplinary activities. »

26 « To practice law in California, State Bar applicants must pass a rigorous three-day examination,
27 a test of their knowledge of the Rules of Professional Conduct and a screening for moral character.
28 The exam, considered one of the toughest in the nation, is administered by the Committee of Bar
29 Examiners (CBE). »

30 « The State Bar's discipline system is designed to protect the public, the courts and the profession
31 from attorneys who violate ethical rules covering their professional conduct. »

32 « In some cases, the bar has no jurisdiction, but seeks to refer the caller to an appropriate
33 agency »

34 « If there is reason to proceed with a complaint, it is sent to the Office of Investigation where
35 formal allegations of misconduct are pursued. At the end of an investigation – usually within six
36 months – if it is concluded that the charges involve probable misconduct, the Office of Trials files
37 formal charges and assumes responsibility for prosecuting them in State Bar Court. »

38 « The State Bar of California is the only state bar in the nation with independent professional
39 judges dedicated to ruling on attorney discipline cases. The independent State Bar Court hears the
40 charges and has the power to recommend that the California Supreme Court suspend or disbar
41 those attorneys found to have committed acts of professional misconduct or convicted of serious
42 crimes. For lesser offenses, it may issue public or private reprovls. »

43 « Also, the State Bar Court can temporarily bar lawyers from the practice of law when they are
44 deemed to pose a substantial threat of harm to clients or the public. Lawyers may seek review of
45 State Bar Court actions in the California Supreme Court. »

46 « The State Bar also recommends that the Supreme Court accept lawyers' resignations with
47 disciplinary charges pending and immediately places such lawyers on inactive status until their
48 resignations take effect. »

49 « The Client Security Fund was created in 1972 to reimburse clients who lose money as a result
50 of an attorney's theft of client funds while acting as a lawyer. »

1 « *Maintaining the standards of the legal profession and ensuring the competent delivery of legal*
2 *services are the highest priorities for the State Bar. »*

3
4 Obviously, indubitably, with no discussion and no dispute, by their unique authority, The STATE
5 BAR of CALIFORNIA is responsible, fully legally responsible of the registration and accreditation
6 of each lawyer in California.

7 So, if the validation of a registration shows a problem from a negligence, an error, an
8 uncompetence, a lack of rigor, or at least, an absolute lack of monitoring, of control, of maintenance
9 after, during the practice of their member, the fault falls to them, and only to them.

10 Their liability is confirmed by the constant link made by the annual membership fees that their
11 members have to pay them to keep valid their registration to practice law.

12
13 **In conclusion, by being the only one authority to give the right, to grant the accreditation to**
14 **practice law as lawyer, and by being against the Law by not doing a strict check of the**
15 **registration in order to control the respect of the professional obligations, and so, by having**
16 **given an accreditation to practice law to a person who did fake declarations, by doing a**
17 **breach of their duty, THE STATE BAR OF CALIFORNIA did the professional offense of**
18 **FAULT OF VALIDATION, REGISTRATION AND ACCREDITATION.**

19
20 **Defendants faults lead to professional problems caused to Plaintiff who suffered stress,**
21 **anxiety, worries, loss of trust in his representative which led to serious troubles in his private**
22 **and professional life, missing great opportunities, delaying and/or aborting his several**
23 **projects, in process and/or in development, by disturbing his mind which is his main tool,**
24 **being inventor, master philosopher, writer, theoretician, designer.**

25 26 27 **TWENTY-FIRST CAUSE OF ACTION**

28 **21. - PASSIVE COMPLICITY, BREACH OF DUTY, LACK OF NEUTRALITY AND** 29 **STAKEHOLDER INVOLVEMENT**

30 **against THE STATE BAR OF CALIFORNIA, Luis J. RODRIGUEZ, and DOES 1-50**

31 If we could accept the fact of a possible negligence, error, uncompetence, lack of rigor and/or a
32 lack of monitoring, of control, of maintenance during the practice of their member, and so, about the
33 registration of Cynthia HACKLER as lawyer, the fact remains that State Bar President Luis J.
34 RODRIGUEZ's behaviour towards Plaintiff is a deliberate absolute lack of respect and a breach of
35 his duty, doing an unlawful professional response, and committing several serious criminal offenses
36 against Plaintiff.

37 He deliberately failed to several STATE BAR OF CALIFORNIA elementary rules and duties
38 which are :

39 « *State Bar of California has shaped the development of the law, regulated the professional*
40 *conduct of the state's lawyers and provided greater access to legal services for all citizens. »*

41 « *The State Bar's discipline system is designed to protect the public, the courts and the profession*
42 *from attorneys who violate ethical rules covering their professional conduct. »*

43 « *In some cases, the bar has no jurisdiction, but seeks to refer the caller to an appropriate*
44 *agency »*

45 « *If there is reason to proceed with a complaint, it is sent to the Office of Investigation where*
46 *formal allegations of misconduct are pursued. At the end of an investigation – usually within six*
47 *months – if it is concluded that the charges involve probable misconduct, the Office of Trials files*
48 *formal charges and assumes responsibility for prosecuting them in State Bar Court. »*

49 « *The State Bar of California is the only state bar in the nation with independent professional*
50 *judges dedicated to ruling on attorney discipline cases. The independent State Bar Court hears the*

1 charges and has the power to recommend that the California Supreme Court suspend or disbar
2 those attorneys found to have committed acts of professional misconduct or convicted of serious
3 crimes. For lesser offenses, it may issue public or private reprovls. »

4 « Also, the State Bar Court can temporarily bar lawyers from the practice of law when they are
5 deemed to pose a substantial threat of harm to clients or the public. Lawyers may seek review of
6 State Bar Court actions in the California Supreme Court. »

7 « The State Bar also recommends that the Supreme Court accept lawyers' resignations with
8 disciplinary charges pending and immediately places such lawyers on inactive status until their
9 resignations take effect. »

10 « Maintaining the standards of the legal profession and ensuring the competent delivery of legal
11 services are the highest priorities for the State Bar. »

12
13 Otherwise, we can see the proofs of their passive involvement and liability.

14 « To practice law in California, applicants must pass the California Bar Examination and pay
15 their annual membership fees to the State Bar of California »

16 « A unified, or integrated bar, means simply that membership is mandatory for all attorneys who
17 are licensed to practice law in the state »

18 « State Bar of California has shaped the development of the law, regulated the professional
19 conduct of the state's lawyers and provided greater access to legal services for all citizens. »

20 « The bar's programs are financed primarily by fees paid by attorneys and applicants to practice
21 law. In 2011, the bar's general fund budget was more than \$64 million, over 75 percent of which
22 funded the bar's attorney disciplinary activities. »

23 « The Client Security Fund was created in 1972 to reimburse clients who lose money as a result
24 of an attorney's theft of client funds while acting as a lawyer. »

25 « Maintaining the standards of the legal profession and ensuring the competent delivery of legal
26 services are the highest priorities for the State Bar. »

27
28 We can also see the motive of their unlawful behaviour, their financial liability.

29 « The bar's programs are financed primarily by fees paid by attorneys and applicants to practice
30 law. In 2011, the bar's general fund budget was more than \$64 million, over 75 percent of which
31 funded the bar's attorney disciplinary activities. »

32 « The Client Security Fund was created in 1972 to reimburse clients who lose money as a result
33 of an attorney's theft of client funds while acting as a lawyer. »

34
35 **In conclusion, being the main and most powerful responsible of the corporation he is in**
36 **charge, being against the Law by ignoring the serious criminal offenses committed by one**
37 **member of the corporation he is responsible, by not helping a victim of a member of the**
38 **corporation he is responsible, by not informing the victim about his rights, his means, by not**
39 **answering and not giving information, proof, advise according the professional behaviours,**
40 **the acts committed by a member denounced by a client, a victim, in order to get a**
41 **confirmation of lawfulness or unlawfulness, by being involved in order to protect the financial**
42 **interest of the corporation he is in charge, by being involved in order to protect the legal**
43 **interest of the corporation he is in charge, by not doing his duties and the duties of the civil**
44 **corporation he is in charge, Luis J. RODRIGUEZ as president of THE STATE BAR OF**
45 **CALIFORNIA took personally the entire responsibility of his decision, his act, his behaviour,**
46 **and did the offenses of PASSIVE COMPLICITY, BREACH OF DUTY, LACK OF**
47 **NEUTRALITY and STAKEHOLDER INVOLVEMENT.**

48
49 **Defendant used deceits, ruses, bad faith and omissions to Plaintiff to protect one of their**
50 **member, in addition to protect the financial and legal interests of his corporation.**

1 **Defendants did use and increased the Plaintiff's distress of his situation being already victim**
2 **of numerous serious criminal offenses.**

3 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
4 **serious troubles in his private and professional life, missing great opportunities, delaying**
5 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
6 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

7
8
9 **TWENTY-SECOND CAUSE OF ACTION**

10 **22. - PROFESSIONAL LIABILITIES, JOINT AND SEVERAL FINANCIAL LIABILITY**
11 **AND SURETIES**

12 **against THE STATE BAR OF CALIFORNIA, Luis J. RODRIGUEZ, and DOES 1-50**

13 Several essential points of their duty, of their commitment, of their rules, of their obligations
14 prove with no doubt their legal liability with their members.

15 Their financial liability is proved at several levels, in professional offenses, and even some
16 criminal ones, when they are committed by their members during the practice of their profession.

- 17 • They have funds for this :

18 *« To practice law in California, applicants must pass the California Bar Examination and pay*
19 *their annual membership fees to the State Bar of California »*

20 *« A unified, or integrated bar, means simply that membership is mandatory for all attorneys who*
21 *are licensed to practice law in the state »*

22 *« The bar's programs are financed primarily by fees paid by attorneys and applicants to practice*
23 *law. In 2011, the bar's general fund budget was more than \$64 million, over 75 percent of which*
24 *funded the bar's attorney disciplinary activities. »*

25 *« The Client Security Fund was created in 1972 to reimburse clients who lose money as a result*
26 *of an attorney's theft of client funds while acting as a lawyer. »*

- 27 • They even have ethics, under their commitment, sworn agreement and will to respect the
28 damages caused to victim.

29 *« Maintaining the standards of the legal profession and ensuring the competent delivery of legal*
30 *services are the highest priorities for the State Bar. »*

31
32 **In conclusion, being responsible of the accreditation of lawyer to practice law, by being**
33 **responsible of their fault, negligence, error about registration and accreditation, by asking**
34 **and taking annual membership fees to keep valid the accreditation of lawyer to practice law,**
35 **by having the duty to protect and to help victims of lawyers when practicing law, by having**
36 **funds, by having funds to compensate victims of their members, THE STATE BAR OF**
37 **CALIFORNIA is PROFESSIONAL LIABILITIES, JOINT AND SEVERAL FINANCIAL**
38 **LIABILITY AND SURETIES for the professional misconducts of its members.**

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41 **PRAYER FOR RELIEF**

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43 **On the FIRST CAUSE OF ACTION**

44 **1. - PROFESSIONAL OFFICE'S ADDRESS FRAUDS**

45 **against Cynthia HACKLER and DOES 1-50**

- 46 1. For an order declaring the official address fraud committed by Defendant ;
47 2. For actual damages to Plaintiff in an amount according to proof at trial;
48 3. For interest thereon at the maximum legally permissible rate;
49 4. For punitive damages in an amount of not less than \$1000 for each of Defendants'
50 retaliatory acts;

5. For all costs of suit incurred herein; and
6. For such other and further relief as deemed just and proper.

On the SECOND CAUSE OF ACTION

**2. - LACKS OF RESPECT FOR THE ESSENTIAL PROFESSIONAL OBLIGATIONS
against Cynthia HACKLER and DOES 1-50**

1. For an order declaring the lack of respect for the essential professional obligations made by Defendant ;
2. For actual damages to Plaintiff in an amount according to proof at trial;
3. For interest thereon at the maximum legally permissible rate;
4. For pain and suffering about moral exhaustion, nervous prostration and emotional distress caused by Defendant in an amount of not less than \$100.000 ;
5. For punitive damages in an amount of not less than \$1000 for each of Defendants' retaliatory acts;
6. For all costs of suit incurred herein; and
7. For such other and further relief as deemed just and proper.

On the THIRD CAUSE OF ACTION

**3. - UNLAWFUL INVOICES
against Cynthia HACKLER and DOES 1-50**

1. For an order declaring the irregularity of Defendant's invoices ;
2. For actual damages to Plaintiff in an amount according to proof at trial;
3. For interest thereon at the maximum legally permissible rate;
4. For punitive damages in an amount of not less than \$1000 for each of Defendants' retaliatory acts;
5. For all costs of suit incurred herein; and
6. For such other and further relief as deemed just and proper.

On the FOURTH CAUSE OF ACTION

**4. - INVOICE FRAUDS
against Cynthia HACKLER and DOES 1-50**

1. For an order declaring the invoice frauds committed by Defendant ;
2. For actual damages to Plaintiff in an amount according to proof at trial;
3. For interest thereon at the maximum legally permissible rate;
4. For pain and suffering about moral exhaustion, nervous prostration and emotional distress caused by Defendant in an amount of not less than \$100.000 ;
5. For punitive damages in an amount of not less than \$1000 for each of Defendants' retaliatory acts;
6. For all costs of suit incurred herein; and
7. For such other and further relief as deemed just and proper.

On the FIFTH CAUSE OF ACTION

**5. - EMBEZZLEMENT AND MISAPPROPRIATION OF FUNDS
against Cynthia HACKLER and DOES 1-50**

1. For an order declaring the embezzlement and misappropriation of funds committed by Defendant ;
2. For an order declaring that Defendant has to refund Plaintiff his two retainers, \$700 and

- 1 \$1500 ;
2 3. For actual damages to Plaintiff in an amount according to proof at trial;
3 4. For interest thereon at the maximum legally permissible rate;
4 5. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
5 caused by Defendant in an amount of not less than \$100.000 ;
6 6. For punitive damages in an amount of not less than \$1000 for each of Defendants'
7 retaliatory acts;
8 7. For all costs of suit incurred herein; and
9 8. For such other and further relief as deemed just and proper.

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12 **On the SIXTH CAUSE OF ACTION**
13 **6. - BLACKMAILS, THREATS, INTIMIDATIONS, PERSECUTION and INTENTIONAL**
14 **INFLECTIONS OF EMOTIONAL DISTRESS**
15 **against Cynthia HACKLER and DOES 1-50**

- 16 1. For an order declaring the blackmails, threats, intimidations, persecution and intentional
17 inflictions of emotional distress committed by Defendant ;
18 2. For actual damages to Plaintiff in an amount according to proof at trial;
19 3. For interest thereon at the maximum legally permissible rate;
20 4. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
21 caused by Defendant in an amount of not less than \$100.000 ;
22 5. For punitive damages in an amount of not less than \$1000 for each of Defendants'
23 retaliatory acts;
24 6. For all costs of suit incurred herein; and
25 7. For such other and further relief as deemed just and proper.

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28 **On the SEVENTH CAUSE OF ACTION**
29 **7. - DELIBERATE OBSTRUCTION OF JUSTICE**
30 **against Cynthia HACKLER and DOES 1-50**

- 31 1. For an order declaring the obstruction of justice committed by Defendant ;
32 2. For actual damages to Plaintiff in an amount according to proof at trial;
33 3. For interest thereon at the maximum legally permissible rate;
34 4. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
35 caused by Defendant in an amount of not less than \$100.000 ;
36 5. For punitive damages in an amount of not less than \$1000 for each of Defendants'
37 retaliatory acts;
38 6. For all costs of suit incurred herein; and
39 7. For such other and further relief as deemed just and proper.

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42 **On the EIGHT CAUSE OF ACTION**
43 **8. - WITHHOLDING OF INFORMATION**
44 **against Cynthia HACKLER and DOES 1-50**

- 45 1. For an order declaring the withholding of information committed by Defendant
46 2. For actual damages to Plaintiff in an amount according to proof at trial;
47 3. For interest thereon at the maximum legally permissible rate;
48 4. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
49 caused by Defendant in an amount of not less than \$100.000 ;
50 5. For punitive damages in an amount of not less than \$1000 for each of Defendants'
51 retaliatory acts;

6. For all costs of suit incurred herein; and
7. For such other and further relief as deemed just and proper.

On the NINTH CAUSE OF ACTION
9. - WITHHOLDING OF DOCUMENTS
against Cynthia HACKLER and DOES 1-50

1. For an order declaring the withholding of documents committed by Defendant
2. For actual damages to Plaintiff in an amount according to proof at trial;
3. For interest thereon at the maximum legally permissible rate;
4. For pain and suffering about moral exhaustion, nervous prostration and emotional distress caused by Defendant in an amount of not less than \$100.000 ;
5. For punitive damages in an amount of not less than \$1000 for each of Defendants' retaliatory acts;
6. For all costs of suit incurred herein; and
7. For such other and further relief as deemed just and proper.

On the TENTH CAUSE OF ACTION
10. - LACKS OF LEGAL KNOWLEDGE
against Cynthia HACKLER and DOES 1-50

1. For an order declaring the lacks of legal knowledge of the Defendant
2. For actual damages to Plaintiff in an amount according to proof at trial;
3. For interest thereon at the maximum legally permissible rate;
4. For punitive damages in an amount of not less than \$1000 for each of Defendants' retaliatory acts;
5. For all costs of suit incurred herein; and
6. For such other and further relief as deemed just and proper.

On the ELEVENTH CAUSE OF ACTION
11. - LACK OF STUDY THE CASE
against Cynthia HACKLER and DOES 1-50

1. For an order declaring the lack of study the case by Defendant
2. For actual damages to Plaintiff in an amount according to proof at trial;
3. For interest thereon at the maximum legally permissible rate;
4. For punitive damages in an amount of not less than \$1000 for each of Defendants' retaliatory acts;
5. For all costs of suit incurred herein; and
6. For such other and further relief as deemed just and proper.

On the TWELFTH CAUSE OF ACTION
12. - CORRUPTION, COLLUSION, CHEATING, LIES, SCAMS, BAD FAITH, PERJURY,
USE OF FAKE WITNESS
against Cynthia HACKLER and DOES 1-50

1. For an order declaring the corruption, collusion, cheating, lies, scams, bad faith, perjury, use of fake witness committed by Defendant
2. For actual damages to Plaintiff in an amount according to proof at trial;
3. For interest thereon at the maximum legally permissible rate;
4. For pain and suffering about moral exhaustion, nervous prostration and emotional distress

- 1 caused by Defendant in an amount of not less than \$100.000 ;
- 2 5. For punitive damages in an amount of not less than \$1000 for each of Defendants'
- 3 6. retaliatory acts;
- 4 7. For all costs of suit incurred herein; and
- 5 8. For such other and further relief as deemed just and proper.

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8 **On the THIRTEENTH CAUSE OF ACTION**
9 **13. - DELIBERATE NEGLIGENCES**
10 **against Cynthia HACKLER and DOES 1-50**

- 11 1. For an order declaring the deliberate negligences committed by Defendant,
- 12 2. For actual damages to Plaintiff in an amount according to proof at trial;
- 13 3. For interest thereon at the maximum legally permissible rate;
- 14 4. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
- 15 caused by Defendant in an amount of not less than \$100.000 ;
- 16 5. For punitive damages in an amount of not less than \$1000 for each of Defendants'
- 17 retaliatory acts;
- 18 6. For all costs of suit incurred herein; and
- 19 7. For such other and further relief as deemed just and proper.

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22 **On the FOURTEENTH CAUSE OF ACTION**
23 **14. - DELIBERATE MALPRACTICES**
24 **against Cynthia HACKLER and DOES 1-50**

- 25 1. For an order declaring the deliberate malpractices committed by Defendant ;
- 26 2. For an order declaring the responsibility of Defendant in the decision of the judge not
- 27 granting a restraining order to Plaintiff ;
- 28 3. For an order declaring the responsibility of Defendant in the decision of the judge
- 29 sentencing Plaintiff to pay the adverse party \$500 ;
- 30 4. For an order declaring that Defendant has to pay the \$500 owed by Plaintiff to adverse
- 31 party;
- 32 5. For actual damages to Plaintiff in an amount according to proof at trial;
- 33 6. For interest thereon at the maximum legally permissible rate;
- 34 7. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
- 35 caused by Defendant in an amount of not less than \$100.000 ;
- 36 8. For punitive damages in an amount of not less than \$1000 for each of Defendants'
- 37 retaliatory acts;
- 38 9. For all costs of suit incurred herein; and
- 39 10. For such other and further relief as deemed just and proper.

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42 **On the FIFTEENTH CAUSE OF ACTION**
43 **15. - PROFITABLE AND USEFUL PASSIVE COMPLICITY WITH THE ADVERSE**
44 **PARTY**

45 **against Cynthia HACKLER and DOES 1-50**

- 46 1. For an order declaring the profitable and useful passive complicity with the adverse
- 47 committed by Defendant ;
- 48 2. For actual damages to Plaintiff in an amount according to proof at trial;
- 49 3. For interest thereon at the maximum legally permissible rate;
- 50 4. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
- 51 caused by Defendant in an amount of not less than \$100.000 ;

5. For punitive damages in an amount of not less than \$1000 for each of Defendants' retaliatory acts;
6. For all costs of suit incurred herein; and
7. For such other and further relief as deemed just and proper.

On the SIXTEENTH CAUSE OF ACTION

**16. - HARASSMENT TO GIVE UP LAWSUITS AGAINST THE ADVERSE PARTY
against Cynthia HACKLER and DOES 1-50**

1. For an order declaring the harassment to give up lawsuits against the adverse party committed by Defendant ;
2. For actual damages to Plaintiff in an amount according to proof at trial;
3. For interest thereon at the maximum legally permissible rate;
4. For pain and suffering about moral exhaustion, nervous prostration and emotional distress caused by Defendant in an amount of not less than \$100.000 ;
5. For punitive damages in an amount of not less than \$1000 for each of Defendants' retaliatory acts;
6. For all costs of suit incurred herein; and
7. For such other and further relief as deemed just and proper.

On the SEVENTEENTH CAUSE OF ACTION

**17. - UNLAWFUL PRACTICE OF THE PROFESSION OF LAWYER
against Cynthia HACKLER and DOES 1-50**

1. For an order declaring the unlawful practice of the profession of lawyer committed by Defendant ;
2. For actual damages to Plaintiff in an amount according to proof at trial;
3. For interest thereon at the maximum legally permissible rate;
4. For punitive damages in an amount of not less than \$1000 for each of Defendants' retaliatory acts;
5. For all costs of suit incurred herein; and
6. For such other and further relief as deemed just and proper.

On the EIGHTEENTH CAUSE OF ACTION

**18. - IMPOSTURE
against Cynthia HACKLER and DOES 1-50**

1. For an order declaring the imposture committed by Defendant ;
2. For actual damages to Plaintiff in an amount according to proof at trial;
3. For interest thereon at the maximum legally permissible rate;
4. For punitive damages in an amount of not less than \$1000 for each of Defendants' retaliatory acts;
5. For all costs of suit incurred herein; and
6. For such other and further relief as deemed just and proper.

On the NINETEENTH CAUSE OF ACTION

**19. - BREACHES OF CONTRACT
against Cynthia HACKLER and DOES 1-50**

1. For an order declaring the breaches of contract committed by Defendant ;
2. For an order declaring that Defendant has to refund Plaintiff his two retainers, \$700 and

- 1 \$1500
2 3. For actual damages to Plaintiff in an amount according to proof at trial;
3 4. For interest thereon at the maximum legally permissible rate;
4 5. For punitive damages in an amount of not less than \$1000 for each of Defendants'
5 retaliatory acts;
6 6. For all costs of suit incurred herein; and
7 7. For such other and further relief as deemed just and proper.
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10 **On the TWENTIETH CAUSE OF ACTION**

11 **20. - FAULT OF VALIDATION, REGISTRATION AND ACCREDITATION.**

12 **against THE STATE BAR OF CALIFORNIA, Luis J. RODRIGUEZ, and DOES 1-50**

- 13 1. For an order declaring the fault of validation and registration committed by Defendants
14 regarding the accreditation given to Cynthia HACKLER as lawyer to practice law ;
15 2. For an order declaring that Defendant has to refund Plaintiff his two retainers given to its
16 member \$700 and \$1500 ;
17 3. For actual damages to Plaintiff in an amount according to proof at trial;
18 4. For interest thereon at the maximum legally permissible rate;
19 5. For punitive damages in an amount of not less than \$1000 for each of Defendants'
20 retaliatory acts;
21 6. For all costs of suit incurred herein; and
22 7. For such other and further relief as deemed just and proper.
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25 **On the TWENTY-FIRST CAUSE OF ACTION**

26 **21. - PASSIVE COMPLICITY, BREACH OF DUTY, LACK OF NEUTRALITY AND**
27 **STAKEHOLDER INVOLVEMENT**

28 **against THE STATE BAR OF CALIFORNIA, Luis J. RODRIGUEZ, and DOES 1-50**

- 29 1. For an order declaring the passive complicity, the breach of duty, the lack of neutrality and
30 stakeholder involvement committed by Defendants against Plaintiff ;
31 2. For a principal sum of \$1.000.000 ;
32 3. For retributory damages in a amount of \$10.000.000, according pain and suffering
33 Defendants did on Plaintiff, with the aggravating factor that Defendants is the highest
34 authority and have deliberately failed their main duty ;
35 4. For actual damages to Plaintiff in an amount according to proof at trial;
36 5. For interest thereon at the maximum legally permissible rate;
37 6. For punitive damages in an amount of not less than \$10.000 for each of Defendants'
38 retaliatory acts;
39 7. For all costs of suit incurred herein; and
40 8. For such other and further relief as deemed just and proper.
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43 **On the TWENTY-SECOND CAUSE OF ACTION**

44 **22. - PROFESSIONAL LIABILITIES, JOINT AND SEVERAL FINANCIAL LIABILITY**
45 **AND SURETIES**

46 **against THE STATE BAR OF CALIFORNIA, Luis J. RODRIGUEZ, and DOES 1-50**

- 47 1. For an order declaring the professional liabilities of Defendants with its members ;
48 2. For an order declaring the professional liabilities of Defendants with Cynthia HACKLER as
49 lawyer ;
50 3. For an order declaring the joint and several financial liability of Defendants with its

- 1 members ;
2 4. For an order declaring the joint and several financial liability of Defendants with Cynthia
3 HACKLER as lawyer ;
4 5. For an order declaring the sureties of Defendants with its members ;
5 6. For an order declaring the sureties of Defendants with Cynthia HACKLER as lawyer ;
6 7. For an order declaring that Defendant has to refund Plaintiff his two retainers, \$700 and
7 \$1500, given to Cynthia HACKLER, and get personal their refund from its member, ;
8 8. For an order declaring that Defendant has to pay damages caused by Cynthia HACKLER as
9 lawyer, to Plaintiff, and to get personal their refund from its member, Cynhtia HACKLER ;
10 9. For an order declaring that Defendant has to pay all financial compensations, all amount
11 owed, ordered by the court that Cynthia HACKLER has to pay to Plaintiff, and to get
12 personal the refund from its member, Cynhtia HACKLER ;
13 10. For actual damages to Plaintiff in an amount according to proof at trial;
14 11. For interest thereon at the maximum legally permissible rate;
15 12. For all costs of suit incurred herein; and
16 13. For such other and further relief as deemed just and proper.
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19 **On all Causes of Action :**

- 20 **1. For attorney's fees according to proof ;**
21 **2. For spent personal time and expenses according the status of representing self ;**
22 **3. For costs of suit incurred herein ; and**
23 **4. For such other and further relief as the Court may deem just and proper.**
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26 **DEMAND FOR JURY TRIAL**

27 Plaintiff, Laurent GRANIER, hereby demands a trial by jury.
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29 **The 10th of september 2014.**

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34 **Laurent GRANIER,**
35 **Plaintiff,**
36 **self-represented**
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