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STK-CV-LD-2021-0006097

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **IN AND FOR THE COUNTY OF SAN JOAQUIN**  
10 **STOCKTON COURTHOUSE**

11 CECILIA MENDEZ; ALICIA RICO; RAYMOND  
12 C. ZULUETA JR.,

13 Plaintiff(s),

14 vs.

15 ANGEL ANN FLORES; and DOES 1 through 50,  
16 Inclusive,

17 Defendant(s).

Case No.:

**COMPLAINT FOR:**

1. DEFAMATION PER SE: LIBEL/SLANDER  
(CAL. CIVIL CODE §§ 44,45,45(a), 46);
2. INTRUSION (INVASION OF PRIVACY);
3. PUBLIC DISCLOSURE OF PRIVATE  
FACTS (INVASION OF PRIVACY);
4. FALSE LIGHT (INVASION OF PRIVACY);  
and
5. INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS

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**[JURY TRIAL DEMANDED]**

1 Plaintiffs, CECILIA MENDEZ, ALICIA RICO, and RAYMOND C. ZULUETA JR., bring this  
2 lawsuit against ANGEL ANN FLORES; and DOES 1 through 50, Inclusive.

3 This action arises from defamation, libel, slander, false, malicious and defamatory statements  
4 made by ANGEL ANN FLORES to third parties accusing CECILIA MENDEZ, ALICIA RICO, and  
5 RAYMOND C. ZULUETA JR., of. Further, this action involves the illegal release of Plaintiffs' personal  
6 information.

7 **I**

8 **PARTIES TO THE CIVIL ACTION**

9 1. Plaintiff CECILIA MENDEZ (hereinafter referred to as "Ms. MENDEZ") at all times  
10 relevant is and was a resident of California.

11 2. Plaintiff ALICIA RICO (hereinafter referred to as "Ms. RICO") at all times relevant is  
12 and was a resident of California.

13 3. Plaintiff RAYMOND C. ZULUETA JR. (hereinafter referred to as "Mr. ZULUETA") at  
14 all times relevant is and was a resident of California.

15 4. Defendant ANGEL ANN FLORES (hereinafter referred to as "Ms. FLORES"), at all  
16 times relevant is and was a resident of California and liable for actions set forth herein at all time relevant  
17 was and is a resident of California and an San Joaquin County employee and is also being sued in her  
18 individual capacity, despite San Joaquin County being liable for her actions.

19 5. Plaintiffs are ignorant of the true names and capacities of Defendants sued herein as  
20 DOES 1-50, inclusive, and therefore sue these Defendants by such fictitious names. Plaintiffs will amend  
21 this complaint to allege their true names and capacities when ascertained. Plaintiffs are informed and  
22 believe and thereon allege that each of the fictitiously named Defendant is responsible in some manner  
23 for the occurrences herein alleged, and that Plaintiffs' damages as herein alleged were proximately  
24 caused by their conduct. Upon information and belief, Plaintiffs allege that all Defendants herein,  
25 including DOES 1-50, at all times herein mentioned were the agents and employees of their Co-  
26 Defendants, and in doing the things hereinafter alleged were acting within the course and scope of such  
27 agency and the permission and consent of their Co-Defendants.

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1 **II**

2 **VENUE AND JURISDICTION**

3 6. Venue is proper as Defendant’s unlawful acts occurred in San Joaquin County, State of  
4 California and unlawful practices and the dissemination of private confidential records were made  
5 in Stockton, California. Defamatory online publications and additional direct publications were made in  
6 Stockton, California and throughout the State of California and the United States.

7 **IV.**

8 **FACTUAL ALLEGATIONS**

9 **Plaintiff CECILIA MENDEZ**

10 6. Ms. FLORES, sitting Board Trustee of Stockton Unified School has engaged in behavior  
11 toward Ms. MENDEZ and fellow colleagues that has been consistent with discrimination, invasion of  
12 privacy, and defamation of character. Ms. FLORES uses SUSD Board Meetings to attack, disparage and  
13 harass fellow trustees who do not share the ideological based actions that Ms. FLORES and her  
14 supporters hold dearly.

15 7. In December of 2020 SUSD Board of Education started the newest term and Ms.  
16 FLORES and former Trustee Ms. CANDELARIA VARGAS worked in concert for over 4 months in  
17 hopes of unduly influencing the board of education to support their non-profit allies and connected  
18 businesses while attacking any trustees that did not align to their understanding. Ms. FLORES is the  
19 main aggressor and has to be prompted to stay on topic and task during every meeting. Additionally, Ms.  
20 FLORES has been censured by the board numerous times but has stated that cease and desist letters,  
21 censures and other legal actions will not be respected by herself.

22 8. Ms. FLORES represents a person who is willfully attempting to bully, harass and unduly  
23 influence the decision making of colleagues who help to make fiduciary decisions for a \$2,000,000,000  
24 in revenue every 3 year fiscal organization. Her statements and actions are intentionally misleading,  
25 harmful to my reputation as a public official and an invasion of my expectation for privacy.

26 9. Ms. FLORES makes the accusation that I am a business partner of former Stockton Mayor  
27 Mr. ANTHONY SILVA which is untrue.

28 10. Ms. FLORES accuses the former Stockton Mayor Mr. ANTHONY SILVA of being a

1 pedophile and that I am a part of a corrupt group that he controls.

2 11. Ms. FLORES makes the accusation that a majority of the Board of Education has sold out  
3 union members and the community. This is a false accusation of fraud.

4 12. Ms. FLORES published a video on Facebook purporting to give information on school  
5 district business and during that video read a letter aloud that stated, "Cecilia Mendez cannot read or  
6 write," then smiled though she is aware that Ms. MENDEZ a Trilingual reader and writer.

7 13. Ms. FLORES accused Ms. MENDEZ of paying supporters for votes. This is a crime in  
8 California.

9 14. Ms. FLORES has not limited her attacks to board members. She has attacked directly; the  
10 CSEA 821 union and Union President Mr. RANDY ST. NICHOLAS, accusing him of inviting her to  
11 dinner and a ride on his motorcycle. She is attacking CSEA 821 because she views them as my  
12 supporters.

13 15. Ms. FLORES regularly uses a Spanish accent to address the board as a way to mock Ms.  
14 MENDEZ. She often forgets to use the accent because it is not natural. Former Trustee Ms.  
15 CANDELARIA VARGAS often joined her in this veiled discriminatory behavior.

16 16. Ms. FLORES attacks Ms. MENDEZ directly in meetings blaming her and others of hiring  
17 based on nepotism and discriminatory actions.

18 17. Ms. FLORES interrupts the business of the board intentionally and prevents the  
19 management of meetings and observation of Robert's Rules of Order.

20 18. Ms. FLORES knowingly repeats the false allegations in public meetings and on social  
21 media despite factual information being presented that disproves her accusations. Her express interest is  
22 in misinforming the public.

23 19. The acts set forth herein constitute defamation per se.

24 20. The actions and inactions set forth herein were willful, wanton, reckless, malicious,  
25 fraudulent, and done with a conscience disregard for the rights of Ms. MENDEZ, entitling Ms. MENDEZ  
26 to punitive damages.

27 21. Ms. MENDEZ and her family have suffered humiliation, embarrassment, loss of  
28 reputation and significant emotional distress entitling her to an award of general damages.

1           **Plaintiff ALICIA RICO**

2           22.     Ms. FLORES, Stockton Unified School has committed toward a pattern of behavior  
3 toward Ms. RICO and fellow colleagues that is consistent with discrimination, harassment, invasion of  
4 privacy, and defamation of character. Ms. FLORES utilizes SUSD Board Meetings to attack, disparage  
5 and harass fellow trustees who do not outwardly express the same ideas in education or social issues.

6           23.     December of 2020 marks the new term for 3 SUSD Board of Education Trustees. Ms.  
7 FLORES and former Trustee Ms. CANDELARIA VARGAS worked in concert for over 4 months to  
8 unduly influence the board of education to support their non-profit allies and connected businesses while  
9 attacking any trustees that did not acquiesce. Ms. FLORES is the primary aggressor and has been  
10 censured, warned continuously of her indiscretions. Additionally, Ms. FLORES has stated that cease and  
11 desist letters, censures and other legal actions will not be respected.

12          24.     Ms. FLORES is willfully attempting to bully, harass and unduly influence the decision  
13 making of her colleagues who are fellow elected officials. Her statements and actions are intentionally  
14 misleading, harmful to my reputation as a public official and an invasion of my expectation for privacy.

15          25.     Ms. FLORES consistently makes the accusation that I am a friend and business partner of  
16 former Stockton Mayor Mr. ANTHONY SILVA.

17          26.     Ms. FLORES consistently accuses former Stockton Mayor Mr. ANTHONY SILVA of  
18 being a pedophile and accuses Ms. RICO and the board of complicity in doing business with him.

19          27.     Ms. FLORES makes the accusation that the majority Board of Education has sold out  
20 union members and the community. This accusation is tantamount to fraud.

21          28.     Ms. FLORES published a video with Former Trustee Ms. CANDELARIA VARGAS on  
22 Facebook calling a censure resolution supported by Trustee Mr. ZULUETA and myself, “a little love  
23 letter.” Ms. RICO is a married woman and so is Trustee Mr. ZULUETA and Former Trustee Ms.  
24 CANDELARIA VARGAS.

25          29.     Ms. FLORES has not limited her attacks to board members. She has attacked employees  
26 of SUSD. She attacked the CSEA 821 union and Union President Mr. RANDY ST. NICHOLAS,  
27 accusing him of inviting her to dinner and a ride on his motorcycle. She is attacking CSEA 821 because  
28 she views them as my supporters.

1           30.     Ms. FLORES regularly uses a Spanish accent to address the board as a way to mock Ms.  
2 RICO. She often forgets to use the accent because it is not natural. Former Trustee Ms. CANDELARIA  
3 VARGAS often joined her in this veiled discriminatory behavior.

4           31.     Ms. FLORES attacks Ms. RICO directly in meetings blaming her and others for hiring  
5 based on corrupt practices.

6           32.     Ms. FLORES interrupts the business of the board intentionally and prevents the  
7 management of meetings and observation of Robert's Rules of Order.

8           33.     Ms. FLORES knowingly repeats the false allegations in public meetings and on social  
9 media despite factual information being presented that disproves her accusations. Her express interest is  
10 in misinforming the public.

11          34.     Ms. FLORES has expressed that she will not stop because she knows that Ms. RICO is a  
12 part of a corrupt group and that is the source of her displeasure and inappropriate behavior.

13          35.     The acts set forth herein constitute defamation per se.

14          36.     The actions and inactions set forth herein were willful, wanton, reckless, malicious,  
15 fraudulent, and done with a conscience disregard for the rights of Ms. RICO, entitling Ms. RICO to  
16 punitive damages.

17          37.     Ms. RICO and her family have suffered humiliation, embarrassment, loss of reputation  
18 and significant emotional distress entitling her to an award of general damages.

19               **Plaintiff RAYMOND C. ZULUETA JR.**

20          38.     Ms. FLORES, Board member Stockton Unified School District Board of Education, has  
21 participated in a pattern of behavior that can be categorized as; invasion of privacy, harassment,  
22 defamation of character, intimidation, slander and discrimination based on my racial identity, political  
23 affiliation, complexion, and national origin.

24          39.     Ms. FLORES attacks have come with accusations of corruption and incidents that have  
25 taken place during SUSD Board Meetings, on social media and in public. The accusations that have been  
26 repeatedly lobbied are untrue and Ms. FLORES is aware of the falsehoods that she is misrepresenting as  
27 facts. These actions have affected me personally, professionally and directly caused loss of income,  
28 severe stress and Ms. FLORES is in violation against her Oath as a Trustee of Stockton Unified School

1 District.

2 40. Prior to joining the Board of Education, Mr. ZULUETA had not met Ms. FLORES and he  
3 never had any interaction with her. Upon joining the board after defeating the sitting incumbent in  
4 December 2021, Mr. ZULUETA noticed that he was not treated the same way as his other colleagues and  
5 he has been subjected to continuous harassment. This caused Mr. ZULUETA to report the behaviors of  
6 our district to the EEOC and a charge of discrimination was issued on 3/3/2021.

7 41. Ms. FLORES consistently makes the accusation that Mr. ZULUETA is a friend and  
8 business partner of former Stockton Mayor Mr. ANTHONY SILVA.

9 42. Ms. FLORES consistently accuses former Stockton Mayor Mr. ANTHONY SILVA of  
10 being a pedophile and accuses Mr. ZULUETA and the board of complicity in doing business with him.

11 43. Ms. FLORES accused Mr. ZULUETA of giving the authority for a sexual assault offender  
12 to enter schools and work with students before he was a board member.

13 44. Ms. FLORES makes the accusation that Mr. ZULUETA have sold out union members and  
14 his community. This is tantamount to an accusation of committing fraud.

15 45. Mr. ZULUETA primary business before joining the board was in educational  
16 programming. Ms. FLORES and partners on the board actively denied Mr. ZULUETA's ability to  
17 contract for services with Stockton Unified School District. In 2019 Mr. ZULUETA had a contract for  
18 services approved by the School Site Council at an SUSD school that was not allowed to be brought  
19 before the board in good faith as the agreement stipulates.

20 46. Ms. FLORES and Partners on the board actively worked to steal Mr. ZULUETA's  
21 intellectual property to ensure funding for their non-profit allies, Former Mayor of Stockton and the  
22 production of the HBO Film Stockton on My Mind. The amount paid to Trustee Ms. FLORES'  
23 supported non-profits who engaged in similarly described work whose cost was more than 10X the  
24 amount of Mr. ZULUETA's proposed agreement with SUSD.

25 47. Ms. FLORES knowingly repeats the false allegations in public meetings and on social  
26 media despite factual information being presented that disproves her accusations. Her interest is in  
27 misinforming the public.

28 48. Ms. FLORES' actions led directly to the loss of \$15,000 for Mr. ZULUETA's company

1 and opportunities for other contracts in the 56 public schools that make up Stockton Unified School  
2 District. Mr. ZULUETA was volunteering at 4 different schools in SUSD modelling his program in  
3 2018-2020.

4 49. This incident stopped Mr. ZULUETA's ability to do business with SUSD and impacted  
5 his ability to continue the business.

6 50. Ms. FLORES' false disclosure that her campaign manager was allowed access to students  
7 in SUSD by Mr. ZULUETA, is debilitating for an educational business. The young man is a sexual  
8 assault violator whose record was recently expunged with the support of Ms. FLORES.

9 51. Mr. ZULUETA is a man of mixed race, brown complexion but his Nationality is  
10 American. Mr. ZULUETA doesn't identify himself as black and he is not African. It is disparaging for  
11 Ms. FLORES to attack Mr. ZULUETA based on her judgement that he has not represented the African  
12 American community.

13 52. Ms. FLORES asserted that she is the sole SUSD representative for the "black community"  
14 in Stockton though she is not a member of the "black community." This is tantamount to saying that Mr.  
15 ZULUETA is not a supporter of parts of his community based on race or ethnicity. This is an accusation  
16 of discrimination.

17 53. Ms. FLORES intimated that Mr. ZULUETA is against "black people" and work against  
18 the black community to their detriment.

19 54. Ms. FLORES asked Mr. ZULUETA if the historical account that he acknowledged at a  
20 meeting was a part of, "your history," or regular history with regard to his identification of an American  
21 indigenous man in a resolution targeted at African Americans.

22 55. Mr. ZULUETA believes that Ms. FLORES believes that he is to be African-American  
23 based on his skin complexion despite his repeated explicit declaration of his identity.

24 56. These attacks by Ms. FLORES did not start until Mr. ZULUETA defeated her preferred  
25 Board Member Mr. LANGE LUNTAO for the Area 4 Board Seat.

26 57. Ms. FLORES and her supporter Former Board Trustee Ms. CANDELARIA VARGAS are  
27 aligned with Former Stockton Mayor Mr. MICHAEL TUBBS and Former Trustee Mr. LANGE  
28 LUNTAO. They all supported Mr. LANGE LUNTAO, Mr. VALENTINO SILVA, and Ms. VIOLA



1 SHACKELFORD against sitting board members who won; Ms. MENDEZ, Ms. RICO and Mr.  
2 ZULUETA. They are attacking and harassing us because they lost the power to control the district.

3 58. Ms. FLORES supported opposing candidates that outspent current sitting board members  
4 in the campaign by a margin of 25-1.

5 59. Ms. FLORES never welcomed new members to the board. Instead took time to  
6 consistently make time to praise former Trustee Mr. LANGE LUNTAO and bemoan his election loss.

7 60. The acts set forth herein constitute defamation per se.

8 61. The actions and inactions set forth herein were willful, wanton, reckless, malicious,  
9 fraudulent, and done with a conscience disregard for the rights of Mr. ZULUETA, entitling Mr.  
10 ZULUETA to punitive damages.

11 62. Mr. ZULUETA and his family have suffered humiliation, embarrassment, loss of  
12 reputation and significant emotional distress entitling him to an award of general damages.

13 **FIRST CAUSE OF ACTION**

14 **DEFAMATION PER SE: LIBEL/SLANDER CIVIL CODE §§ 45, 45(a) and 46**

15 63. Plaintiffs hereby re-allege and incorporate by reference as though fully set forth herein,  
16 the allegations contained in paragraphs 1 through 62. This cause of action is pled against all Defendants.

17 64. Defendants, and each of them, individually and through their officers, agents, and/or  
18 employees acting within the scope of their employment, caused to be published false statements tending  
19 directly to injure Plaintiffs in their general, occupations, trade, business, and professional reputations and  
20 pursuits.

21 65. The false and defamatory statements included express accusation of embezzlement due to  
22 Plaintiffs' actions.

23 66. This statement is factually untrue and defamatory. It is not a statement of opinion. The  
24 statements were made maliciously.

25 67. The defamatory statements set forth herein are slanderous per se in that it tends to injure  
26 Plaintiffs in their office, profession, trade, or business by imputing to their general  
27 disqualification in those respects that the occupation peculiarly requires and exposes Plaintiffs to hatred,  
28 contempt, ridicule, and obloquy, and have a tendency to injure them in their occupation. These

1 publications falsely accuse Plaintiffs of criminal conduct.

2 68. The original utterer of slanderous remarks can be liable for the consequences of  
3 republication to third persons.

4 69. Plaintiff are informed and believe Defendants conspired, and thereon alleges that during  
5 the above-described time frame. Defendants, and each of them negligently, recklessly, intentionally and  
6 to cause online publications set forth herein.

7 70. The publications were made of and concerning Plaintiffs and was so understood by third  
8 persons. The publications of the defamatory statement was heard and read by unprivileged third persons.  
9 The actions of all parties constitute a conspiracy under the law.

10 71. Plaintiffs are informed, believe, and fears that these false and defamatory statements will  
11 continue to be published and will be foreseeably republished by other recipients, all to the ongoing harm  
12 and injury to Plaintiffs' business, professional and personal reputations. Plaintiffs also seek redress in this  
13 action for all foreseeable republication of the defamatory statements.

14 72. Defendants committed the acts stated herein maliciously, fraudulently, and oppressively,  
15 with the wrongful intention of injuring Plaintiffs, from an improper and evil motive amounting to malice,  
16 and in conscious disregard of Plaintiffs' rights. Plaintiffs are thus entitled to recover punitive damages  
17 from all Defendants in an amount according to proof.

18 73. As a proximate result of Defendants' defamation of Plaintiffs, Plaintiffs have suffered and  
19 continues to suffer embarrassment, humiliation, mental anguish, and harm to their reputation, all to their  
20 damage in an amount according to proof.

21 74. As a further proximate result of the defamatory publications, Plaintiffs have suffered  
22 special damages all to their injury and Defendants' actions constituted defamation per se for which the  
23 damages are presumed.

24 75. The aforementioned acts of the Defendants were willful, wanton, malicious, and  
25 oppressive and with a conscious disregard for Plaintiffs exercising their legal rights. The County of San  
26 Joaquin is vicariously liable for these defamatory per se acts.

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1 **SECOND CAUSE OF ACTION**

2 **INTRUSION [INVASION OF PRIVACY]**

3 76. Plaintiffs hereby re-allege and incorporate by reference as though fully set forth herein,  
4 the allegations contained in paragraphs 1 through 75. This cause of action is pled against all Defendants.

5 77. Plaintiffs have and had the right to be free from intrusion into their private affairs and  
6 records. Defendants intended to intrude in the private affairs of Plaintiffs. The right of privacy is the right  
7 to live one's life without being subjected to unwarranted and undesired publicity. The intrusion  
8 experienced by Plaintiffs was willful, malicious, intentional and highly offensive to each Plaintiff and  
9 any reasonable person under these circumstances, causing injury and damages.

10 78. In committing the forgoing acts, named individual Defendants were guilty of malice,  
11 fraud and oppression, and acted in conscious disregard of Plaintiffs' rights, and Plaintiffs are therefore  
12 also entitled to an award of punitive damages in addition to the actual damages, for the sake of example  
13 and by way of punishing Defendants.

14 **THIRD CAUSE OF ACTION**

15 **PUBLIC DISCLOSURE OF PRIVATE FACTS [INVASION OF PRIVACY]**

16 79. Plaintiffs hereby re-allege and incorporate by reference as though fully set forth herein,  
17 the allegations contained in paragraphs 1 through 78. This cause of action is pled against all Defendants.

18 80. Plaintiffs have and had the right to be free from intrusion into their private affairs and  
19 records. Defendants intended to intrude in the private affairs of Plaintiffs. The right of privacy is the right  
20 to live one's life without being subjected to unwarranted and undesired publicity. The intrusion  
21 experienced by Plaintiffs was willful, malicious, intentional and highly offensive to each Plaintiff and  
22 any reasonable person under these circumstances, causing injury and damages.

23 81. In committing the forgoing acts, named individual Defendants were guilty fraud and  
24 oppression, and acted in conscious disregard of Plaintiffs' rights, and Plaintiffs are therefore also entitled  
25 to an award of punitive damages in addition to the actual damages, for the sake of example and by way of  
26 punishing Defendants.

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1 **FOURTH CAUSE OF ACTION**

2 **FALSE LIGHT [INVASION OF PRIVACY]**

3 82. Plaintiffs hereby re-allege and incorporate by reference as though fully set forth herein,  
4 the allegations contained in paragraphs 1 through 81. This cause of action is pled against all Defendants.

5 83. Plaintiffs have and had the right to be free from intrusion into his private affairs and  
6 records. Defendants intended to intrude in the private affairs of Plaintiffs. The right of privacy is the right  
7 to live one's life without being subjected to unwarranted and undesired publicity. The intrusion  
8 experienced by Plaintiffs was willful, malicious, intentional and highly offensive to each Plaintiff and  
9 any reasonable person under these circumstances, causing injury and damages.

10 84. The actions of Defendants were accompanied by publicity and communications to the  
11 public in general, government authorities, media outlets, media print and online dissemination.

12 85. The disclosures by Defendants were unfair, inaccurate and a false depiction of Plaintiffs.

13 86. The result of Defendants action placed Plaintiffs in a false light and was highly offensive  
14 to them and to any reasonable person, causing general damages.

15 87. In committing the forgoing acts, named individual Defendants were guilty of malice,  
16 fraud and oppression, and acted in conscious disregard of Plaintiffs' rights, and Plaintiffs are therefore  
17 also entitled to an award of punitive damages in addition to the actual damages, for the sake of xample  
18 and by way of punishing Defendants.

19 **FIFTH CAUSE OF ACTION**

20 **INTENTIONAL INFLICATION OF EMOTIONAL DISTRESS**

21 88. Plaintiffs hereby re-allege and incorporate by reference as though fully set forth herein,  
22 the allegations contained in paragraph 1 through 87. This cause of action is pled against all Defendants.

23 89. The actions of Defendants were outrageous and done intentionally, willfully, recklessly  
24 and disgracefully. The conduct of Defendants was despicable and reprehensible resulting in emotional  
25 distress to Plaintiffs and their families.

26 90. In committing the forgoing acts, named individual Defendants were guilty of malice,  
27 fraud and oppression, and acted in conscious disregard of Plaintiffs' rights, and Plaintiffs are therefore  
28 also entitled to an award of punitive damages in addition to the actual damages, for the sake of example

1 and by way of punishing Defendants.

2 **PRAYER**

3 **WHEREFORE**, Plaintiffs, CECILIA MENDEZ, ALICIA RICO, and RAYMOND C.  
4 ZULUETA JR., pray for judgment against Defendants as follows:

- 5 1. For general damages in a sum according to proof;
- 6 2. For medical and related expenses according to proof;
- 7 3. For special damages, according to proof;
- 8 4. For defamation per se damages in the amount of \$20,000,000 or whatever the trier of fact  
9 deems appropriate;
- 10 5. For punitive damages against the named Individual Defendants in an amount of  
11 \$20,000,000 or whatever the trier of fact deems appropriate pursuant to California Civil  
12 Code § 3294;
- 13 6. For reasonable attorneys' fees and costs;
- 14 7. For an award of interest, including prejudgment interest, at the legal rate; and
- 15 8. For such other and further relief as the Court may deem just and proper.

16 **ADDITIONALLY**, Plaintiffs, Plaintiffs, CECILIA MENDEZ, ALICIA RICO, and RAYMOND  
17 C. ZULUETA JR., demand trial of this matter by jury. The amount demanded exceeds \$25,000.00  
18 (Government Code section 72055).

19  
20 Respectfully submitted,

21 DATED: July 8, 2021

22  
23   
24 \_\_\_\_\_

25 Attorney(s) for Plaintiff(s): Cecilia Mendez, Alicia Rico,  
26 Raymond C. Zulueta Jr.