

1 Cheryl Sanders
2 P.O. Box 79444
3 Corona, CA 92877
4 Telephone: 951-733-8730

5 In Pro Per

**ELECTRONICALLY
FILED**
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CIVIL COMPLEX CENTER

Dec 22 2010

ALAN CARLSON, Clerk of the Court
by E. Veloz

6
7 SUPERIOR COURT OF CALIFORNIA
8 FOR THE COUNTY OF ORANGE-CENTRAL JUSTICE CENTER
9

10 CHERYL SANDERS

CASE NO.: 30-2010-00435218

Hon. David Chaffee

11
12 v.

COMPLAINT FOR:

13
14 JOHN DOE 1 aka "KERRY W"; JOHN DOE
15 2 aka "KAREN"; JOHN DOE 3 aka
16 "JACKIE"; JOHN DOE 4 aka "ROBERT M";
JOHN DOE 5 aka "ELIZABETH K" and
DOES 6 THROUGH 100, INCLUSIVE

1. Libel
2. False Light
3. Intentional Infliction of Emotional Distress
4. Negligent Infliction of Emotional Distress

17
18 Plaintiff, CHERYL SANDERS, alleges as follows:

19 1. Plaintiff is an individual and is now, and at all times mentioned in this
20 complaint, an employee for the City of Anaheim located in the County of Orange, State of
21 California.

22 2. Plaintiff has during all this time enjoyed a good reputation, both generally and in
23 her occupation with the City of Anaheim.

24 3. The true name of Defendant, JOHN DOE 1 aka "Kerry W", whether individual,
25 corporate, associate or otherwise, is unknown to Plaintiff at this time because Defendant is and
26 yet remains an "anonymous," unidentified user of the Internet. Plaintiff therefore sues
27 Defendant by fictitious name pursuant to section 474 of the Code of Civil Procedure. Plaintiff
28

1 is informed and believes, and based on that information and belief alleges, that Defendant,
2 JOHN DOE 1 aka "Kerry W" is legally responsible for the events and happenings referred to in
3 this complaint, and unlawfully caused the injuries and damages to Plaintiff alleged in this
4 complaint.

5 4. The true name of Defendant, JOHN DOE 2 aka "Karen", whether individual,
6 corporate, associate or otherwise, is unknown to Plaintiff at this time because Defendant is and
7 yet remains an "anonymous," unidentified user of the Internet. Plaintiff therefore sues
8 Defendant by fictitious name pursuant to section 474 of the Code of Civil Procedure. Plaintiff
9 is informed and believes, and based on that information and belief alleges, that Defendant,
10 JOHN DOE 2 aka "Karen" is legally responsible for the events and happenings referred to in
11 this complaint, and unlawfully caused the injuries and damages to Plaintiff alleged in this
12 complaint.

13 5. The true name of Defendant, JOHN DOE 3 aka "Jackie", whether individual,
14 corporate, associate or otherwise, is unknown to Plaintiff at this time because Defendant is and
15 yet remains an "anonymous," unidentified user of the Internet. Plaintiff therefore sues
16 Defendant by fictitious name pursuant to section 474 of the Code of Civil Procedure. Plaintiff
17 is informed and believes, and based on that information and belief alleges, that Defendant,
18 JOHN DOE 3 aka "Jackie" is legally responsible for the events and happenings referred to in
19 this complaint, and unlawfully caused the injuries and damages to Plaintiff alleged in this
20 complaint.

21 6. The true name of Defendant, JOHN DOE 4 aka "Robert M", whether
22 individual, corporate, associate or otherwise, is unknown to Plaintiff at this time because
23 Defendant is and yet remains an "anonymous," unidentified users of the Internet. Plaintiff
24 therefore sues Defendant by fictitious name pursuant to section 474 of the Code of Civil
25 Procedure. Plaintiff is informed and believes, and based on that information and belief alleges,
26 that Defendant, JOHN DOE 4 aka "Robert M" is legally responsible for the events and
27 happenings referred to in this complaint, and unlawfully caused the injuries and damages to
28 Plaintiff alleged in this complaint.

1 7. The true name of Defendant, JOHN DOE 5 aka "Elizabeth K", whether
2 individual, corporate, associate or otherwise, is unknown to Plaintiff at this time because
3 Defendant is and yet remains an "anonymous," unidentified user of the Internet. Plaintiff
4 therefore sues Defendant by fictitious name pursuant to section 474 of the Code of Civil
5 Procedure. Plaintiff is informed and believes, and based on that information and belief alleges,
6 that Defendant, JOHN DOE 5 aka "Elizabeth K" is legally responsible for the events and
7 happenings referred to in this complaint, and unlawfully caused the injuries and damages to
8 Plaintiff alleged in this complaint.

9 8. The true names or capacities, whether individual, corporate, associate or
10 otherwise, of each of the Doe Defendants is unknown to Plaintiff at this time because
11 Defendants are and yet remain "anonymous," unidentified users of the Internet. Plaintiff
12 therefore sue Defendants by fictitious names pursuant to section 474 of the Code of Civil
13 Procedure. Plaintiff is informed and believes, and based on that information and belief alleges,
14 that each Doe Defendant is legally responsible for the events and happenings referred to in this
15 complaint, and unlawfully caused the injuries and damages to Plaintiff alleged in this
16 complaint.

17 9. Plaintiff is informed and believes, and based on that information and belief
18 alleges, that at all times mentioned in this complaint, defendants were the agents and employees
19 of their codefendants and in doing the things alleged in this complaint were acting within the
20 course and scope of such agency and employment.

21 10. Jurisdiction and venue are proper in this Court in that Plaintiff has suffered
22 injury in California as a result of Defendants' tortuous act of publishing defamatory statements
23 about Plaintiff on the Internet, which was published to millions of people in the United States
24 including persons in the State of California.

25 ///

26 ///

27 ///

1 FIRST CAUSE OF ACTION

2 (Libel)

3 11. Plaintiff re-alleges and fully incorporates herein by reference all allegations
4 contained in paragraphs 1 through 10 above.

5 12. On or about On December 10, 2010, Defendant, JOHN DOE 1 aka "Kerry W"
6 formulated, published and disseminated, on www.yelp.com, the following false statement:

7 "Investigation on the City of Anaheim? Cheryl Sanders in the planning dept. We
8 all know what is going on in the City of Anaheim planning dept. Our residents
9 are tired of our tax dollars being sunk into the City of Anaheim, into the
10 planning dept and into the friends and family members (sub-contractors) of the
11 employees of the planning department! How much extra "under the table"
12 money is being made from our planning dept????? A nice detailed audit and
13 internal investigation will fix this rather quickly as we have demanded one from
14 our government! We the residents of Anaheim are tired of the Planning Dept.
15 planning for themselves and not our community. We hope that people like
16 Cheryl Sanders are investigated, audited and brought to justice!!!!!! We are
17 tired City of Anaheim and the people are now joining together to bring justice to
18 our community! Oh, I agree on keeping our own lawns in order, however we
19 cannot let the city "flip and spin" the responsibility back on to its residents!!
20 This is an old trick and now its our turn to make the city of Anaheim responsible
21 for its dishonest acts that are happening behind closed doors!" (Attached hereto
22 as Exhibit "1" is a true and correct copy of the internet publication.)

23 13. The statement set forth in Paragraph 12 of this complaint referred to Plaintiff by
24 name throughout, was made of and concerning Plaintiff, and was so understood by those who
25 read the publication.

26 14. The statement set forth in Paragraph 12 of this complaint is false as it pertains to
27 Plaintiff.

28 15. The statement set forth in Paragraph 12 of this complaint is libelous on its face.
It clearly exposes Plaintiff to hatred, contempt, ridicule and obloquy because is charges
Plaintiff with having committed and being investigated for criminal acts.

16. The statement set forth in Paragraph 12 of this complaint was seen and read by
the public, including citizens of the City of Anaheim.

///

1 17. As a proximate result of the false statement set forth in Paragraph 12 of this
2 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
3 feelings, all to her damage in an amount to be established by proof at trial.

4 18. Defendant, JOHN DOE 1 aka "Kerry W's" acts in formulating, publishing and
5 disseminating the false statement set forth in Paragraph 12 of this complaint, was done with the
6 knowledge by JOHN DOE 1 aka "Kerry W" that such acts would cause Plaintiff to suffer great
7 humiliation, mental anguish and injury. Defendant, JOHN DOE 1 aka "Kerry W's"
8 acts were therefore willful, wanton, intentionally and actually malicious and oppressive,
9 thereby justifying the award of exemplary and punitive damages in an amount to be established
10 by proof at trial.

11 19. On or about On December 10, 2010, Defendant, JOHN DOE 1 aka "Kerry W"
12 formulated, published and disseminated, on www.yelp.com, the following false statement

13 "Okay Clarke t. probably a friend of Cheryl Sanders in the planning dept. We all
14 know what is going on in the City of Anaheim planning dept. Our residents are
15 tired of our tax dollars being sunk into the City of Anaheim, into the planning
16 dept and into the friends and family members (sub-contractors) of the employees
17 of the planning department! How much extra "under the table" money is being
18 made from our planning dept????? A nice detailed audit and internal
19 investigation will fix this rather quickly as we have demanded one from our
20 government! We the residents of Anaheim are tired of the Planning Dept.
21 planning for themselves and not our community. We hope that people like
22 Cheryl Sanders are investigated, audited and brought to justice!!!!!! We are
23 tired City of Anaheim and the people are now joining together to bring justice to
24 our community! Oh, I agree on keeping our own lawns in order, however we
25 cannot let the city "flip and spin" the responsibility back on to its residents!!
26 This is an old trick and now its our turn to make the city of Anaheim responsible
27 for its dishonest acts that are happening behind closed doors!" *(Attached hereto*
28 *as Exhibit "2" is a true and correct copy of the internet publication.)*

20. The statement set forth in Paragraph 19 of this complaint referred to Plaintiff by
name throughout, was made of and concerning Plaintiff, and was so understood by those who
read the publication.

///

///

1 21. The statement set forth in Paragraph 19 of this complaint is false as it pertains to
2 Plaintiff.

3 22. The statement set forth in Paragraph 19 of this complaint is libelous on its face.
4 It clearly exposes Plaintiff to hatred, contempt, ridicule and obloquy because is charges
5 Plaintiff with having committed and being investigated for criminal acts.

6 23. The statement set forth in Paragraph 19 of this complaint was seen and read by
7 the public, including citizens of the City of Anaheim.

8 24. As a proximate result of the false statement set forth in Paragraph 19 of this
9 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
10 feelings, all to her damage in an amount to be established by proof at trial.

11 25. Defendant, JOHN DOE 1 aka "Kerry W's" acts in formulating, publishing and
12 disseminating the false statement set forth in Paragraph 19 of this complaint, was done with the
13 knowledge by JOHN DOE 1 aka "Kerry W" that such acts would cause Plaintiff to suffer great
14 humiliation, mental anguish and injury. Defendant, JOHN DOE 1 aka "Kerry W's" acts were
15 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
16 justifying the award of exemplary and punitive damages in an amount to be established by
17 proof at trial.

18 26. On December 10, 2010, Defendant, JOHN DOE 2 aka "Karen" formulated,
19 published and disseminated, on www.merchantcircle.com, the following false statement:

20 "Thank you Cheryl Sanders for hurting the community by giving all the
21 construction business in Anaheim for a under the table bribe. I hope that an
22 investigation takes place soon and you end up behind bars." *(Attached hereto as
Exhibit "3" is a true and correct copy of the internet publication.)*

23 27. The statement set forth in Paragraph 26 of this complaint referred to Plaintiff by
24 name throughout, was made of and concerning Plaintiff, and was so understood by those who
25 read the publication.

26 28. The statement set forth in Paragraph 26 of this complaint is false as it pertains to
27 Plaintiff.

28 ///

1 29. The statement set forth in Paragraph 26 of this complaint is libelous on its face.
2 It clearly exposes Plaintiff to hatred, contempt, ridicule and obloquy because is charges
3 Plaintiff with having committed and being investigated for criminal acts.

4 30. The statement set forth in Paragraph 26 of this complaint was seen and read by
5 the public, including citizens of the City of Anaheim.

6 31. As a proximate result of the false statement set forth in Paragraph 26 of this
7 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
8 feelings, all to her damage in an amount to be established by proof at trial.

9 32. Defendant, JOHN DOE 2 aka "Karen's" acts in formulating, publishing and
10 disseminating the false statement set forth in Paragraph 26 of this complaint, was done with the
11 knowledge by JOHN DOE 2 aka "Karen" that such acts would cause Plaintiff to suffer great
12 humiliation, mental anguish and injury. Defendant, JOHN DOE 2 aka "Karen's" acts were
13 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
14 justifying the award of exemplary and punitive damages in an amount to be established by
15 proof at trial.

16 33. On December 10, 2010, JOHN DOE 3 aka "Jackie" formulated, published and
17 disseminated, on www.merchantcircle.com, the following false statement:

18 "Cheryl Sanders at the City of Anaheim Planning Dept. has been putting up a
19 front long enough. We hope to bring you down soon. Your dishonesty and
20 greediness will soon come to an end." *(Attached hereto as Exhibit "4" is a true
and correct copy of the internet posting.)*

21 34. The statement set in Paragraph 33 of this complaint referred to Plaintiff by name
22 throughout, was made of and concerning Plaintiff, and was so understood by those who read
23 the publication.

24 35. The statement set forth in Paragraph 33 of this complaint is false as it pertains to
25 Plaintiff.

26 36. The statement set forth in Paragraph 33 of this complaint is libelous on its face.
27 It clearly exposes Plaintiff to hatred, contempt, ridicule and obloquy because is charges
28 Plaintiff with being "dishonest" and "greedy".

1 37. The statement set forth in Paragraph 33 of this complaint was seen and read by
2 the public, including citizens of the City of Anaheim.

3 38. As a proximate result of the false statement set forth in Paragraph 33 of this
4 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
5 feelings, all to her damage in an amount to be established by proof at trial.

6 39. Defendant, JOHN DOE 3 aka "Jackie's" acts in formulating, publishing and
7 disseminating the false statement set forth in Paragraph 33 of this complaint, was done with the
8 knowledge by JOHN DOE 3 aka "Jackie" that such acts would cause Plaintiff to suffer great
9 humiliation, mental anguish and injury. Defendant, JOHN DOE 3 aka "Jackie's" acts were
10 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
11 justifying the award of exemplary and punitive damages in an amount to be established by
12 proof at trial.

13 40. On December 12, 2010, JOHN DOE 4 aka "Robert M" formulated, published
14 and disseminated, on www.orangejuiceblog.com, the following false statement:

15 "City of Anaheim corruption investigating Cheryl Sanders in the planning dept.
16 It's about time someone investigating the fraudulent dealings of Cheryl Sanders
17 in the Citys most corrupted dept. Support this internal investigation." *(Attached
hereto as Exhibit "5" is a true and correct copy of the internet publication.)*

18 41. The statement set forth in Paragraph 40 of this complaint referred to Plaintiff by
19 name throughout, was made of and concerning Plaintiff, and was so understood by those who
20 read the publication.

21 42. The statement set forth in Paragraph 40 of this complaint is false as it pertains to
22 Plaintiff.

23 43. The statement set forth in Paragraph 40 of this complaint is libelous on its face.
24 It clearly exposes Plaintiff to hatred, contempt, ridicule and obloquy because is charges
25 Plaintiff with having committed and being investigated for criminal acts.

26 44. The statement set forth in Paragraph 40 of this complaint was seen and read by
27 the public, including citizens of the City of Anaheim.

28 ///

1 45. As a proximate result of the false statement set forth in Paragraph 40 of this
2 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
3 feelings, all to her damage in an amount to be established by proof at trial.

4 46. Defendant, JOHN DOE 4 aka "Robert M's" acts in formulating, publishing and
5 disseminating the false statement set forth in Paragraph 40 of this complaint, was done with the
6 knowledge by JOHN DOE 4 aka "Robert M" that such acts would cause Plaintiff to suffer great
7 humiliation, mental anguish and injury. Defendant, JOHN DOE 4 aka "Robert M's" acts were
8 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
9 justifying the award of exemplary and punitive damages in an amount to be established by
10 proof at trial.

11 47. On December 12, 2010, JOHN DOE 5 aka "Elizabeth K" formulated, published
12 and disseminated, on www.fullertonsfuture.org, the following false statement:

13 " Well from what the community is saying, I hear Cheryl Sanders is the wolf in
14 sheep's clothing and one of the dishonest employees wheeling and dealing
15 taking advantage of our tax dollars. I was told of a possible internal
16 investigation? If so then I pray the thieves become known and their deeds
17 become pub[l]ic and they/she is brought to justice! I'm so tire of public
employees misusing their positions!" *(Attached hereto as Exhibit "6" is a true
and correct copy of the internet publication.)*

18 48. The statement set forth in Paragraph 47 of this complaint referred to Plaintiff by
19 name throughout, was made of and concerning Plaintiff, and was so understood by those who
20 read the publication.

21 49. The statement set forth in Paragraph 47 of this complaint is false as it pertains to
22 Plaintiff.

23 50. The statement set forth in Paragraph 47 of this complaint is libelous on its face.
24 It clearly exposes Plaintiff to hatred, contempt, ridicule and obloquy because is charges
25 Plaintiff with having committed and being investigated for criminal acts.

26 51. The statement set forth in Paragraph 47 of this complaint was seen and read by
27 the public, including citizens of the City of Anaheim.

28 ///

52. As a proximate result of the false statement set forth in Paragraph 47 of this complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her feelings, all to her damage in an amount to be established by proof at trial.

53. Defendant, JOHN DOE 5 aka "Elizabeth K's" acts in formulating, publishing and disseminating the false statement set forth in Paragraph 47 of this complaint, was done with the knowledge by JOHN DOE 5 aka "Elizabeth K" that such acts would cause Plaintiff to suffer great humiliation, mental anguish and injury. Defendant, JOHN DOE 5 aka "Elizabeth K's" acts were therefore willful, wanton, intentionally and actually malicious and oppressive, thereby justifying the award of exemplary and punitive damages in an amount to be established by proof at trial.

SECOND CAUSE OF ACTION

(False Light)

54. Plaintiff re-alleges and fully incorporates herein by reference all allegations contained in paragraphs 1 through 53 above.

55. On or about On December 10, 2010, Defendant, JOHN DOE 1 aka "Kerry W" formulated, published and disseminated, on www.yelp.com, the following false statement:

“Investigation on the City of Anaheim? Cheryl Sanders in the planning dept. We all know what is going on in the City of Anaheim planning dept. Our residents are tired of our tax dollars being sunk into the City of Anaheim, into the planning dept and into the friends and family members (sub-contractors) of the employees of the planning department! How much extra "under the table" money is being made from our planning dept????? A nice detailed audit and internal investigation will fix this rather quickly as we have demanded one from our government! We the residents of Anaheim are tired of the Planning Dept. planning for themselves and not our community. We hope that people like Cheryl Sanders are investigated, audited and brought to justice!!!!!! We are tired City of Anaheim and the people are now joining together to bring justice to our community! Oh, I agree on keeping our own lawns in order, however we cannot let the city "flip and spin" the responsibility back on to its residents!! This is an old trick and now its our turn to make the city of Anaheim responsible for its dishonest acts that are happening behind closed doors!”

///

///

1 56. The statement set forth in Paragraph 55 of this complaint placed Plaintiff in a
2 materially false and damaging light.

3 57. The false light in which Defendant, JOHN DOE 1 aka "Kerry W" placed
4 Plaintiff would be highly offensive to similar individuals.

5 58. As a proximate result of the false statement set forth in Paragraph 55 of this
6 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
7 feelings, all to her damage in an amount to be established by proof at trial.

8 59. Defendant, JOHN DOE 1 aka "Kerry W's" acts in formulating, publishing and
9 disseminating the false statement set forth in Paragraph 55 of this complaint, was done with the
10 knowledge by JOHN DOE 1 aka "Kerry W" that such acts would cause Plaintiff to suffer great
11 humiliation, mental anguish and injury. Defendant, JOHN DOE 1 aka "Kerry W's" acts were
12 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
13 justifying the award of exemplary and punitive damages in an amount to be established by
14 proof at trial.

15 60. On December 10, 2010, JOHN DOE 1 aka "Kerry W" formulated, published and
16 disseminated, on www.yelp.com, the following false statement:

17 "Okay Clarke t. probably a friend of Cheryl Sanders in the planning dept. We all
18 know what is going on in the City of Anaheim planning dept. Our residents are
19 tired of our tax dollars being sunk into the City of Anaheim, into the planning
20 dept and into the friends and family members (sub-contractors) of the employees
21 of the planning department! How much extra "under the table" money is being
22 made from our planning dept????? A nice detailed audit and internal
23 investigation will fix this rather quickly as we have demanded one from our
24 government! We the residents of Anaheim are tired of the Planning Dept.
25 planning for themselves and not our community. We hope that people like
26 Cheryl Sanders are investigated, audited and brought to justice!!!!!! We are
27 tired City of Anaheim and the people are now joining together to bring justice to
28 our community! Oh, I agree on keeping our own lawns in order, however we
cannot let the city "flip and spin" the responsibility back on to its residents!!
This is an old trick and now its our turn to make the city of Anaheim responsible
for its dishonest acts that are happening behind closed doors!"

61. The statement set forth in Paragraph 60 of this complaint placed Plaintiff in a
materially false and damaging light.

1 62. The false light in which Defendant, JOHN DOE 1 aka "Kerry W" placed
2 Plaintiff would be highly offensive to similar individuals.

3 63. As a proximate result of the false statement set forth in Paragraph 60 of this
4 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
5 feelings, all to her damage in an amount to be established by proof at trial.

6 64. Defendant, JOHN DOE 1 aka "Kerry W's" acts in formulating, publishing and
7 disseminating the false statement set forth in Paragraph 60 of this complaint, was done with the
8 knowledge by JOHN DOE 1 aka "Kerry W" that such acts would cause Plaintiff to suffer great
9 humiliation, mental anguish and injury. Defendant, JOHN DOE 1 aka "Kerry W's" acts were
10 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
11 justifying the award of exemplary and punitive damages in an amount to be established by
12 proof at trial.

13 65. On December 10, 2010, Defendant, JOHN DOE 2 aka "Karen" formulated,
14 published and disseminated, on www.merchantcircle.com, the following false statement:

15 "Thank you Cheryl Sanders for hurting the community by giving all the
16 construction business in Anaheim for a under the table bribe. I hope that an
17 investigation takes place soon and you end up behind bars."

18 66. The statement set forth in Paragraph 65 of this complaint placed Plaintiff in a
19 materially false and damaging light.

20 67. The false light in which Defendant, JOHN DOE 2 aka "Karen" placed Plaintiff
21 would be highly offensive to similar individuals.

22 68. As a proximate result of the false statement set forth in Paragraph 65 of this
23 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
24 feelings, all to her damage in an amount to be established by proof at trial.

25 69. Defendant, JOHN DOE 2 aka "Karen's" acts in formulating, publishing and
26 disseminating the false statement set forth in Paragraph 65 of this complaint, was done with the
27 knowledge by JOHN DOE 2 aka "Karen" that such acts would cause Plaintiff to suffer great
28 humiliation, mental anguish and injury. Defendant, JOHN DOE 2 aka "Karen's" acts were

1 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
2 justifying the award of exemplary and punitive damages in an amount to be established by
3 proof at trial.

4 70. On December 10, 2010, JOHN DOE 3 aka "Jackie" formulated, published and
5 disseminated, on www.merchantcircle.com, the following false statement:

6 "Cheryl Sanders at the City of Anaheim Planning Dept. has been putting up a
7 front long enough. We hope to bring you down soon. Your dishonesty and
8 greediness will soon come to an end."

9 71. The statement set forth in Paragraph 70 of this complaint placed Plaintiff in a
10 materially false and damaging light.

11 72. The false light in which Defendant, JOHN DOE 3 aka "Jackie" placed Plaintiff
12 would be highly offensive to similar individuals.

13 73. As a proximate result of the false statement set forth in Paragraph 70 of this
14 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
15 feelings, all to her damage in an amount to be established by proof at trial.

16 74. Defendant, JOHN DOE 3 aka "Jackie's" acts in formulating, publishing and
17 disseminating the false statement set forth in Paragraph 70 of this complaint, was done with the
18 knowledge by JOHN DOE 3 aka "Jackie" that such acts would cause Plaintiff to suffer great
19 humiliation, mental anguish and injury. Defendant, JOHN DOE 3 aka "Jackie's" acts were
20 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
21 justifying the award of exemplary and punitive damages in an amount to be established by
22 proof at trial.

23 75. On December 12, 2010, JOHN DOE 4 aka "Robert M" formulated, published
24 and disseminated, on www.orangejuiceblog.com, the following false statement:

25 "City of Anaheim corruption investigating Cheryl Sanders in the planning dept.
26 It's about time someone investigating the fraudulent dealings of Cheryl
27 Sanders in the Citys most corrupted dept. Support this internal investigation."

28 76. The statement set forth in Paragraph 75 of this complaint placed Plaintiff in a
materially false and damaging light.

1 77. The false light in which Defendant, JOHN DOE 4 aka "Robert M" placed
2 Plaintiff would be highly offensive to similar individuals.

3 78. As a proximate result of the false statement set forth in Paragraph 75 of this
4 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
5 feelings, all to her damage in an amount to be established by proof at trial.

6 79. Defendant, JOHN DOE 4 aka "Robert M's" acts in formulating, publishing and
7 disseminating the false statement set forth in Paragraph 75 of this complaint, was done with the
8 knowledge by JOHN DOE 4 aka "Robert M" that such acts would cause Plaintiff to suffer great
9 humiliation, mental anguish and injury. Defendant, JOHN DOE 4 aka "Robert M's" acts were
10 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
11 justifying the award of exemplary and punitive damages in an amount to be established by
12 proof at trial.

13 80. On December 12, 2010, JOHN DOE 5 aka "Elizabeth K" formulated, published
14 and disseminated, on www.fullertonsfuture.org, the following false statement:

15 "Well from what the community is saying, I hear Cheryl Sanders is the wolf in
16 sheep's clothing and one of the dishonest employees wheeling and dealing
17 taking advantage of our tax dollars. I was told of a possible internal
18 investigation? If so then I pray the thieves become known and their deeds
become pubic and they/she is brought to justice! I'm so tire of public employees
misusing their positions!"

19 81. The statement set forth in Paragraph 80 of this complaint placed Plaintiff in a
20 materially false and damaging light.

21 82. The false light in which Defendant, JOHN DOE 5 aka "Elizabeth K" placed
22 Plaintiff would be highly offensive to similar individuals.

23 83. As a proximate result of the false statement set forth in Paragraph 80 of this
24 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
25 feelings, all to her damage in an amount to be established by proof at trial.

26 ///

27 ///

28 ///

1 84. Defendant, JOHN DOE 5 aka "Elizabeth K's" acts in formulating, publishing
2 and disseminating the false statement set forth in Paragraph 80 of this complaint, was done with
3 the knowledge by JOHN DOE 5 aka "Elizabeth K" that such acts would cause Plaintiff to
4 suffer great humiliation, mental anguish and injury. Defendant, JOHN DOE 5 aka "Elizabeth
5 K's" acts were therefore willful, wanton, intentionally and actually malicious and oppressive,
6 thereby justifying the award of exemplary and punitive damages in an amount to be established
7 by proof at trial.

8 **THIRD CAUSE OF ACTION**

9 *(Intentional Infliction of Emotional Distress)*

10 85. Plaintiff re-alleges and fully incorporates herein by reference all allegations
11 contained in paragraphs 1 through 84 above.

12 86. On or about On December 10, 2010, JOHN DOE 1 aka "Kerry W" formulated,
13 published and disseminated on, www.yelp.com, the following false statement:

14 "Investigation on the City of Anaheim? Cheryl Sanders in the planning dept. We
15 all know what is going on in the City of Anaheim planning dept. Our residents
16 are tired of our tax dollars being sunk into the City of Anaheim, into the
17 planning dept and into the friends and family members (sub-contractors) of the
18 employees of the planning department! How much extra "under the table"
19 money is being made from our planning dept????? A nice detailed audit and
20 internal investigation will fix this rather quickly as we have demanded one from
21 our government! We the residents of Anaheim are tired of the Planning Dept.
22 planning for themselves and not our community. We hope that people like
23 Cheryl Sanders are investigated, audited and brought to justice!!!!!! We are
24 tired City of Anaheim and the people are now joining together to bring justice to
25 our community! Oh, I agree on keeping our own lawns in order, however we
26 cannot let the city "flip and spin" the responsibility back on to its residents!!
27 This is an old trick and now its our turn to make the city of Anaheim responsible
28 for its dishonest acts that are happening behind closed doors!"

24 ///

25 ///

26 ///

1 87. Defendant, JOHN DOE 1 aka "Kerry W's" conduct in formulating, publishing
2 and disseminating the false statement set forth in Paragraph 86 of this complaint was
3 intentional and malicious and done for the purpose of causing Plaintiff to suffer humiliation and
4 mental anguish. Defendant, JOHN DOE 1 aka "Kerry W's" conduct in confirming and ratifying
5 these acts was done with knowledge that Plaintiff would suffer emotional distress and was done
6 with a wanton and reckless disregard of the consequences to the Plaintiff.

7 88. As a proximate result of the false statement set forth in Paragraph 86 of this
8 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
9 feelings, all to her damage in an amount to be established by proof at trial.

10 89. Defendant, JOHN DOE 1 aka "Kerry W's" acts in formulating, publishing and
11 disseminating the false statement set forth in Paragraph 86 of this complaint, was done with the
12 knowledge by JOHN DOE 1 aka "Kerry W" that such acts would cause Plaintiff to suffer great
13 humiliation, mental anguish and injury. Defendant, JOHN DOE 1 aka "Kerry W's" acts were
14 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
15 justifying the award of exemplary and punitive damages.

16 90. On December 10, 2010, JOHN DOE 1 aka "Kerry W" formulated, published and
17 disseminated, on www.yelp.com, the following false statement:

18 "Okay Clarke t. probably a friend of Cheryl Sanders in the planning dept. We all
19 know what is going on in the City of Anaheim planning dept. Our residents are
20 tired of our tax dollars being sunk into the City of Anaheim, into the planning
21 dept and into the friends and family members (sub-contractors) of the employees
22 of the planning department! How much extra "under the table" money is being
23 made from our planning dept????? A nice detailed audit and internal
24 investigation will fix this rather quickly as we have demanded one from our
25 government! We the residents of Anaheim are tired of the Planning Dept.
26 planning for themselves and not our community. We hope that people like
27 Cheryl Sanders are investigated, audited and brought to justice!!!!!! We are
28 tired City of Anaheim and the people are now joining together to bring justice to
our community! Oh, I agree on keeping our own lawns in order, however we
cannot let the city "flip and spin" the responsibility back on to its residents!!
This is an old trick and now its our turn to make the city of Anaheim responsible
for its dishonest acts that are happening behind closed doors!"

///
28

1 91. Defendant, JOHN DOE 1 aka "Kerry W's" conduct in formulating, publishing
2 and disseminating the false statement set forth in Paragraph 90 of this complaint was
3 intentional and malicious and done for the purpose of causing Plaintiff to suffer humiliation and
4 mental anguish. Defendant, JOHN DOE 1 aka "Kerry W's" conduct in confirming and ratifying
5 these acts was done with knowledge that Plaintiff would suffer emotional distress and was done
6 with a wanton and reckless disregard of the consequences to the Plaintiff.

7 92. As a proximate result of the false statement set forth in Paragraph 90 of this
8 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
9 feelings, all to her damage in an amount to be established by proof at trial.

10 93. Defendant, JOHN DOE 1 aka "Kerry W's" acts in formulating, publishing and
11 disseminating the false statement set forth in Paragraph 90 of this complaint, was done with the
12 knowledge by JOHN DOE 1 aka "Kerry W" that such acts would cause Plaintiff to suffer great
13 humiliation, mental anguish and injury. Defendant, JOHN DOE 1 aka "Kerry W's" acts were
14 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
15 justifying the award of exemplary and punitive damages.

16 94. On December 10, 2010, Defendant, JOHN DOE 2 aka "Karen" formulated,
17 published and disseminated, on www.merchantcircle.com, the following false statement:

18 "Thank you Cheryl Sanders for hurting the community by giving all the
19 construction business in Anaheim for a under the table bribe. I hope that an
20 investigation takes place soon and you end up behind bars."

21 95. Defendant, JOHN DOE 2 aka "Karen's" conduct in formulating, publishing and
22 disseminating the false statement set forth in Paragraph 94 of this complaint was intentional
23 and malicious and done for the purpose of causing Plaintiff to suffer humiliation and mental
24 anguish. Defendant, JOHN DOE 2 aka "Karen's" conduct in confirming and ratifying these acts
25 was done with knowledge that Plaintiff would suffer emotional distress and was done with a
26 wanton and reckless disregard of the consequences to the Plaintiff.

27 96. As a proximate result of false statement set forth in Paragraph 94 of this
28 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
feelings, all to her damage in an amount to be established by proof at trial.

1 97. Defendant, JOHN DOE 2 aka "Karen's" acts in formulating, publishing and
2 disseminating the false statement set forth in Paragraph 94 of this complaint, was done with the
3 knowledge by JOHN DOE 2 aka "Karen" that such acts would cause Plaintiff to suffer great
4 humiliation, mental anguish and injury. Defendant, JOHN DOE 2 aka "Karen's" acts were
5 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
6 justifying the award of exemplary and punitive damages.

7 98. On December 10, 2010, JOHN DOE 3 aka "Jackie" formulated, published and
8 disseminated, on on www.merchantcircle.com, the following false statement:

9 "Cheryl Sanders at the City of Anaheim Planning Dept. has been putting up a
10 front long enough. We hope to bring you down soon. Your dishonesty and
11 greediness will soon come to an end."

12 99. Defendant, JOHN DOE 3 aka "Jackie's" conduct in formulating, publishing and
13 disseminating the false statement set forth in Paragraph 98 of this complaint was intentional
14 and malicious and done for the purpose of causing Plaintiff to suffer humiliation and mental
15 anguish. Defendant, JOHN DOE 2 aka "Jackie's" conduct in confirming and ratifying these acts
16 was done with knowledge that Plaintiff would suffer emotional distress and was done with a
17 wanton and reckless disregard of the consequences to the Plaintiff.

18 100. As a proximate result of the false statement set forth in Paragraph 98 of this
19 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
20 feelings, all to her damage in an amount to be established by proof at trial.

21 101. Defendant, JOHN DOE 3 aka "Jackie's" acts in formulating, publishing and
22 disseminating the false statement set forth in Paragraph 98 of this complaint, was done with the
23 knowledge by JOHN DOE 3 aka "Jackie" that such acts would cause Plaintiff to suffer great
24 humiliation, mental anguish and injury. Defendant, JOHN DOE 3 aka "Jackie's" acts were
25 therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
26 justifying the award of exemplary and punitive damages.

27 ///

28 ///

1 102. On December 12, 2010, JOHN DOE 4 aka "Robert M" formulated, published
2 and disseminated, on www.orangejuiceblog.com, the following false statement:

3 "City of Anaheim corruption investigating Cheryl Sanders in the planning dept.
4 It's about time someone investigating the fraudulent dealings of Cheryl Sanders
5 in the Citys most corrupted dept. Support this internal investigation."

6 103. Defendant, JOHN DOE 4 aka "Robert M's" conduct in formulating, publishing
7 and disseminating the false statement set forth in Paragraph 102 of this complaint was
8 intentional and malicious and done for the purpose of causing Plaintiff to suffer humiliation and
9 mental anguish. Defendant, JOHN DOE 4 aka "Robert M's" conduct in confirming and
10 ratifying these acts was done with knowledge that Plaintiff would suffer emotional distress and
11 was done with a wanton and reckless disregard of the consequences to the Plaintiff.

12 104. As a proximate result of the false statement set forth in Paragraph 102 of this
13 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
14 feelings, all to her damage in an amount to be established by proof at trial.

15 105. Defendant, JOHN DOE 4 aka "Robert M's" acts in formulating, publishing and
16 disseminating the false statement set forth in Paragraph 102 of this complaint, was done with
17 the knowledge by JOHN DOE 4 aka "Robert M" that such acts would cause Plaintiff to suffer
18 great humiliation, mental anguish and injury. Defendant, JOHN DOE 4 aka "Robert M's" acts
19 were therefore willful, wanton, intentionally and actually malicious and oppressive, thereby
20 justifying the award of exemplary and punitive damages.

21 106. On December 12, 2010, JOHN DOE 5 aka "Elizabeth K" formulated, published
22 and disseminated, on www.fullertonsfuture.org, the following false statement:

23 "Well from what the community is saying, I hear Cheryl Sanders is the wolf in
24 sheep's clothing and one of the dishonest employees wheeling and dealing
25 taking advantage of our tax dollars. I was told of a possible internal
26 investigation? If so then I pray the thieves become known and their deeds
27 become pubic and they/she is brought to justice! I'm so tire of public employees
28 misusing their positions!"

///

1 107. Defendant, JOHN DOE 5 aka "Elizabeth K's" conduct in formulating,
2 publishing and disseminating the false statement set forth in Paragraph 106 of this complaint
3 was intentional and malicious and done for the purpose of causing Plaintiff to suffer
4 humiliation and mental anguish. Defendant, JOHN DOE 5 aka "Elizabeth K's" conduct in
5 confirming and ratifying these acts was done with knowledge that Plaintiff would suffer
6 emotional distress and was done with a wanton and reckless disregard of the consequences to
7 the Plaintiff.

8 108. As a proximate result of the false statement set forth in Paragraph 106 of this
9 complaint, Plaintiff has suffered loss of reputation, shame, mortification, and injury to her
10 feelings, all to her damage in an amount to be established by proof at trial.

11 109. Defendant, JOHN DOE 5 aka "Elizabeth K's" acts in formulating, publishing
12 and disseminating the false statement set forth in Paragraph 106 of this complaint, was done
13 with the knowledge by JOHN DOE 5 aka "Elizabeth K" that such acts would cause Plaintiff to
14 suffer great humiliation, mental anguish and injury. Defendant, JOHN DOE 5 aka "Elizabeth
15 K's" acts were therefore willful, wanton, intentionally and actually malicious and oppressive,
16 thereby justifying the award of exemplary and punitive damages.

17 **FOURTH CAUSE OF ACTION**

18 *(Negligent Infliction of Emotional Distress)*

19 110. Plaintiff re-alleges and fully incorporates herein by reference all allegations
20 contained in paragraphs 1 through 109 above.

21 111. On or about On December 10, 2010, JOHN DOE 1 aka "Kerry W" formulated,
22 published and disseminated, on www.yelp.com, the following false statement:

23 "Investigation on the City of Anaheim? Cheryl Sanders in the planning dept. We
24 all know what is going on in the City of Anaheim planning dept. Our residents
25 are tired of our tax dollars being sunk into the City of Anaheim, into the
26 planning dept and into the friends and family members (sub-contractors) of the
27 employees of the planning department! How much extra "under the table"
28 money is being made from our planning dept????? A nice detailed audit and
internal investigation will fix this rather quickly as we have demanded one from
our government! We the residents of Anaheim are tired of the Planning Dept.
planning for themselves and not our community. We hope that people like
Cheryl Sanders are investigated, audited and brought to justice!!!!!! We are
tired City of Anaheim and the people are now joining together to bring justice to

1 our community! Oh, I agree on keeping our own lawns in order, however we
2 cannot let the city "flip and spin" the responsibility back on to its residents!!
3 This is an old trick and now its our turn to make the city of Anaheim responsible
for its dishonest acts that are happening behind closed doors!"

4 112. Plaintiff was owed a duty by Defendant, JOHN DOE 1 aka "Kerry W" to use
5 reasonable and ordinary care in writing, printing, publishing and circulating the statement set
6 forth in Paragraph 111 of this complaint.

7 113. Defendant, JOHN DOE 1 aka "Kerry W" breached this duty of care owed to
8 Plaintiff by writing, printing, publishing and circulating, or causing to be written, printed,
9 published and circulated the false statement set forth in Paragraph 111 of this complaint.

10 114. Defendant, JOHN DOE 1 aka "Kerry W", jointly or separately, knew, or should
11 have known, that the failure to exercise due care in the performance of writing, printing,
12 publishing and circulating, or causing to be written, printed, published and circulated the false
13 statement set forth in Paragraph 111 of this complaint would cause Plaintiff severe emotional
14 distress.

15 115. Defendant, JOHN DOE 1 aka "Kerry W", by permitting the false statement set
16 forth in Paragraph 111 of this complaint to be written, printed, published and circulated,
17 breached the duty of care owed to Plaintiff.

18 116. As a direct and proximate result of the Defendant, JOHN DOE 1 aka "Kerry
19 W's" breach of duty owed to Plaintiff, Plaintiff has suffered severe emotional distress and
20 mental suffering, in a total amount to be established by proof at trial.

21 117. The false statement set forth in Paragraph 111 of this complaint was published
22 with malice, hatred and ill will toward Plaintiff for the purpose of causing Plaintiff to suffer
23 humiliation, mental anguish, and emotional and physical distress. Because of JOHN DOE 1
24 aka "Kerry W's" malice in publishing this false statement, Plaintiff seeks punitive damages in a
25 total amount to be established by proof at trial.

26 ///

27 ///

28 ///

1 118. On December 10, 2010, JOHN DOE 1 aka "Kerry W" formulated, published and
2 disseminated, on www.yelp.com, the following false statement:

3 "Okay Clarke t. probably a friend of Cheryl Sanders in the planning dept. We all
4 know what is going on in the City of Anaheim planning dept. Our residents are
5 tired of our tax dollars being sunk into the City of Anaheim, into the planning
6 dept and into the friends and family members (sub-contractors) of the employees
7 of the planning department! How much extra "under the table" money is being
8 made from our planning dept????? A nice detailed audit and internal
9 investigation will fix this rather quickly as we have demanded one from our
10 government! We the residents of Anaheim are tired of the Planning Dept.
11 planning for themselves and not our community. We hope that people like
12 Cheryl Sanders are investigated, audited and brought to justice!!!!!! We are
tired City of Anaheim and the people are now joining together to bring justice to
our community! Oh, I agree on keeping our own lawns in order, however we
cannot let the city "flip and spin" the responsibility back on to its residents!!
This is an old trick and now its our turn to make the city of Anaheim responsible
for its dishonest acts that are happening behind closed doors!"

13 119. Plaintiff was owed a duty by Defendant, JOHN DOE 1 aka "Kerry W" to use
14 reasonable and ordinary care in writing, printing, publishing and circulating the statement set
15 forth in Paragraph 118 of this complaint.

16 120. Defendant, JOHN DOE 1 aka "Kerry W" breached this duty of care owed to
17 Plaintiff by writing, printing, publishing and circulating, or causing to be written, printed,
18 published and circulated the false statement set forth in Paragraph 118 of this complaint.
19 Defendant, JOHN DOE 1 aka "Kerry W", jointly or separately, knew, or should have known,
20 that the failure to exercise due care in the performance of writing, printing, publishing and
21 circulating, or causing to be written, printed, published and circulated the false statement set
22 forth in Paragraph 118 of this complaint would cause Plaintiff severe emotional distress.

23 121. Defendant, JOHN DOE 1 aka "Kerry W", by permitting the above-referenced
24 statement to be written, printed, published and circulated, breached this duty of care owed to
25 Plaintiff.

26 122. As a direct and proximate result of the Defendant, JOHN DOE 1 aka "Kerry
27 W's" breach of duty owed to Plaintiff, Plaintiff has suffered severe emotional distress and
28 mental suffering, in a total amount to be established by proof at trial.

1 123. The statement set forth in Paragraph 118 of this complaint was published with
2 malice, hatred and ill will toward Plaintiff for the purpose of causing Plaintiff to suffer
3 humiliation, mental anguish, and emotional and physical distress. Because of JOHN DOE 1
4 aka "Kerry W's" malice in publishing the false statement set forth in Paragraph 118 of this
5 complaint, Plaintiff seeks punitive damages in a total amount to be established by proof at trial.

6 124. On December 10, 2010, Defendant, JOHN DOE 2 aka "Karen" formulated,
7 published and disseminated, on www.merchantcircle.com, the following false statement:

8 "Thank you Cheryl Sanders for hurting the community by giving all the
9 construction business in Anaheim for a under the table bribe. I hope that an
10 investigation takes place soon and you end up behind bars."

11 125. Plaintiff was owed a duty by Defendant, JOHN DOE 2 aka "Karen" to use
12 reasonable and ordinary care in writing, printing, publishing and circulating the statement set
13 forth in Paragraph 124 of this complaint.

14 126. Defendant, JOHN DOE 2 aka "Karen" breached this duty of care owed to
15 Plaintiff by writing, printing, publishing and circulating, or causing to be written, printed,
16 published and circulated the false statement set forth in Paragraph 124 of this complaint.
17 Defendant, JOHN DOE 2 aka "Karen", jointly or separately, knew, or should have known, that
18 the failure to exercise due care in the performance of writing, printing, publishing and
19 circulating, or causing to be written, printed, published and circulated the false statement set
20 forth in Paragraph 124 of this complaint would cause Plaintiff severe emotional distress.

21 127. Defendant, JOHN DOE 2 aka "Karen", by permitting the false statement set
22 forth in Paragraph 124 of this complaint to be written, printed, published and circulated,
23 breached this duty of care owed to Plaintiff.

24 128. As a direct and proximate result of the Defendant, JOHN DOE 2 aka "Karen's"
25 breach of duty owed to Plaintiff, Plaintiff has suffered severe emotional distress and mental
26 suffering, all to her general damage in a sum which is to be proven at the time of trial.

27 129. The false statement set forth in Paragraph 124 of this complaint was published
28 with malice, hatred and ill will toward Plaintiff for the purpose of causing Plaintiff to suffer
humiliation, mental anguish, and emotional and physical distress. Because of JOHN DOE 2

1 aka "Karen's" malice in publishing this false statement, Plaintiff seeks punitive damages in a
2 total amount to be established by proof at trial.

3 130. On December 10, 2010, JOHN DOE 3 aka "Jackie" formulated, published and
4 disseminated, on www.merchantcircle.com, the following false statement:

5 "Cheryl Sanders at the City of Anaheim Planning Dept. has been putting up a
6 front long enough. We hope to bring you down soon. Your dishonesty and
7 greediness will soon come to an end."

8 131. Plaintiff was owed a duty by Defendant, JOHN DOE 3 aka "Jackie" to use
9 reasonable and ordinary care in writing, printing, publishing and circulating the statement set
10 forth in Paragraph 130 of this complaint.

11 132. Defendant, JOHN DOE 3 aka "Jackie" breached this duty of care owed to
12 Plaintiff by writing, printing, publishing and circulating, or causing to be written, printed,
13 published and circulated the false statement set forth in Paragraph 130 of this complaint.
14 Defendant, JOHN DOE 3 aka "Jackie", jointly or separately, knew, or should have known, that
15 his failure to exercise due care in the performance of writing, printing, publishing and
16 circulating, or causing to be written, printed, published and circulated the false statement set
17 forth in Paragraph 130 of this complaint would cause Plaintiff severe emotional distress.

18 133. Defendant, JOHN DOE 3 aka "Jackie", by permitting the false statement set
19 forth in Paragraph 130 of this complaint to be written, printed, published and circulated,
20 breached this duty of care owed to Plaintiff.

21 134. As a direct and proximate result of the Defendant, JOHN DOE 3 aka "Jackie's"
22 breach of duty owed to Plaintiff, Plaintiff has suffered severe emotional distress and mental
23 suffering, in a total amount to be established by proof at trial.

24 135. The statement set forth in Paragraph 130 of this complaint was published with
25 malice, hatred and ill will toward Plaintiff for the purpose of causing Plaintiff to suffer
26 humiliation, mental anguish, and emotional and physical distress. Because of JOHN DOE 3
27 aka "Jackie's" malice in publishing this false statement, Plaintiff seeks punitive damages in a
28 total amount to be established by proof at trial.

1 136. On December 12, 2010, JOHN DOE 4 aka "Robert M" formulated, published
2 and disseminated, on www.orangejuiceblog.com, the following false statement:

3 "City of Anaheim corruption investigating Cheryl Sanders in the planning dept.
4 It's about time someone investigating the fraudulent dealings of Cheryl Sanders
5 in the Citys most corrupted dept. Support this internal investigation."

6 137. Plaintiff was owed a duty by Defendant, JOHN DOE 4 aka "Robert M" to use
7 reasonable and ordinary care in writing, printing, publishing and circulating the statement set
8 forth in Paragraph 136 of this complaint.

9 138. Defendant, JOHN DOE 4 aka "Robert M" breached this duty of care owed to
10 Plaintiff by writing, printing, publishing and circulating, or causing to be written, printed,
11 published and circulated the false statement set forth in Paragraph 136 of this complaint.
12 Defendant, JOHN DOE 4 aka "Robert M", jointly or separately, knew, or should have known,
13 that the failure to exercise due care in the performance of writing, printing, publishing and
14 circulating, or causing to be written, printed, published and circulated the false statement set
15 forth in Paragraph 136 of this complaint would cause Plaintiff severe emotional distress.

16 139. Defendant, JOHN DOE 4 aka "Robert M", by permitting the false statement set
17 forth in Paragraph 136 of this complaint to be written, printed, published and circulated,
18 breached this duty of care owed to Plaintiff.

19 140. As a direct and proximate result of the Defendant, JOHN DOE 4 aka "Robert
20 M's" breach of duty owed to Plaintiff, Plaintiff has suffered severe emotional distress and
21 mental suffering, in a total amount to be established by proof at trial.

22 141. The statement set forth in Paragraph 136 of this complaint was published with
23 malice, hatred and ill will toward Plaintiff for the purpose of causing Plaintiff to suffer
24 humiliation, mental anguish, and emotional and physical distress. Because of JOHN DOE 4
25 aka "Robert M's" malice in publishing this false statement set forth in Paragraph 136 of this
26 complaint, Plaintiff seeks punitive damages in a total amount to be established by proof at trial.

27 ///

28 ///

1 142. On December 12, 2010, JOHN DOE 5 aka "Elizabeth K" formulated, published
2 and disseminated on, www.fullertonsfuture.org, the following false statement:

3 “Well from what the community is saying, I hear Cheryl Sanders is the wolf in
4 sheep’s clothing and one of the dishonest employees wheeling and dealing
5 taking advantage of our tax dollars. I was told of a possible internal
6 investigation? If so then I pray the thieves become known and their deeds
become pubic and they/she is brought to justice! I’m so tire of public employees
misusing their positions!”

7 143. Plaintiff was owed a duty by Defendant, JOHN DOE 5 aka "Elizabeth K" to use
8 reasonable and ordinary care in writing, printing, publishing and circulating the statement set
9 forth in Paragraph 142 of this complaint.

10 144. Defendant, JOHN DOE 5 aka "Elizabeth K" breached this duty of care owed to
11 Plaintiff by writing, printing, publishing and circulating, or causing to be written, printed,
12 published and circulated the false statement set forth in Paragraph 142 of this complaint.
13 Defendant, JOHN DOE 5 aka "Elizabeth K", jointly or separately, knew, or should have
14 known, that the failure to exercise due care in the performance of writing, printing, publishing
15 and circulating, or causing to be written, printed, published and circulated the false statement
16 set forth in Paragraph 142 of this complaint would cause Plaintiff severe emotional distress.

17 145. Defendant, JOHN DOE 5 aka "Elizabeth K", by permitting the false statement
18 set forth in Paragraph 142 of this complaint to be written, printed, published and circulated,
19 breached this duty of care owed to Plaintiff.

20 146. As a direct and proximate result of the Defendant, JOHN DOE 5 aka "Elizabeth
21 K's" breach of duty owed to Plaintiff, Plaintiff has suffered severe emotional distress and
22 mental suffering, in a total amount to be established by proof at trial.

23 ///

24 ///

25 ///

1 147. The false statement set forth in Paragraph 142 of this complaint was published
2 with malice, hatred and ill will toward Plaintiff for the purpose of causing Plaintiff to suffer
3 humiliation, mental anguish, and emotional and physical distress. Because of JOHN DOE 5
4 aka "Elizabeth K's" malice in publishing this false statement, Plaintiff seeks punitive damages
5 in a total amount to be established by proof at trial.

6 **WHEREFORE**, Plaintiff prays for judgment against Defendants, and each of them, as
7 follows:

8 **FIRST CAUSE OF ACTION**

- 9 1. Compensatory damages according to proof;
10 2. Punitive damages;
11 3. Interest as allowed by law;
12 4. Costs of suit; and
13 5. Such other and further relief as this court may deem just and proper.

14 **SECOND CAUSE OF ACTION**

- 15 1. Compensatory damages according to proof;
16 2. Punitive damages;
17 3. Interest as allowed by law;
18 4. Costs of suit; and
19 5. Such other and further relief as this court may deem just and proper.

20 **THIRD CAUSE OF ACTION**

- 21 1. Compensatory damages according to proof;
22 2. Punitive damages;
23 3. Interest as allowed by law;
24 4. Costs of suit; and
25 5. Such other and further relief as this court may deem just and proper.

26 ///

27 ///

28 ///

1 **FOURTH CAUSE OF ACTION**

- 2 1. Compensatory damages according to proof;
- 3 2. Punitive damages;
- 4 3. Interest as allowed by law;
- 5 4. Costs of suit; and
- 6 5. Such other and further relief as this court may deem just and proper.

7

8 DATED: 12-21-10



CHERYL SANDERS

EXHIBIT "1"

yelp
Real people. Real reviews.

Search for (e.g. taco, cheap dinner, Max's) Near (Address, Neighborhood, City, State or Zip) **San Francisco, CA**

Welcome About Me Write a Review Find Reviews Invite Friends Messaging Talk Events Member Search

Profile Home Lists Reviews Compliments Friends Bookmarks Events

Kerry "LocalWarrior" W.'s Profile



0 Friends
2 Reviews
1 Review Update

Send Compliment
Send Message

Location
Anaheim, CA

Yelping Since
March 2010

Flag this profile

Recent Reviews 2 Reviews

Filter by: Location Category

Search for reviews

Sort by: Date

City of Anaheim

500 W Broadway
Anaheim, CA 92805
(714) 765-1850

★☆☆☆☆ Update - 12/10/2010

Investigation on the City of Anaheim? Cheryl Sanders in the planning dept. We all know what is going on in the City of Anaheim planning dept. Our residents are tired of our tax dollars being sunk into the City of Anaheim, into the planning dept and into the friends and family members (sub-contractors) of the employees of the planning department! How much extra "under the table" money is being made from our planning dept????? A nice detailed audit and internal investigation will fix this rather quickly as we have demanded one from our government! We the residents of Anaheim are tired of the Planning Dept. planning for themselves and not our community. We hope that people like Cheryl Sanders are investigated, audited and brought to justice!!!!!! We are tired City of Anaheim and the people are now joining together to bring justice to our community!

Oh, I agree on keeping our own lawns in order, however we cannot let the city "flip and spin" the responsibility back on to its residents!! This is an old trick and now its our turn to make the city of Anaheim responsible for its dishonest acts that are happening behind closed doors!

Was this review ... ? Useful Funny Cool

1 Previous Review: Hide »

☆☆☆☆☆ 12/10/2010

Okay Clarke t. probably a friend of Cheryl Sanders in the planning dept. We all know what is going on in the City of Anaheim planning dept. Our residents are tired of our tax dollars being sunk into the City of Anaheim, into the planning dept and into the friends and family members (sub-contractors) of the employees of the planning department! How much extra "under the table" money is being made from our planning dept????? A nice detailed audit and internal investigation will fix this rather quickly as we have demanded one from our government! We the residents of Anaheim are tired of the Planning Dept. planning for themselves and not our community. We hope that people like Cheryl Sanders are investigated, audited and brought to justice!!!!!! We are tired City of Anaheim and the people are now joining together to bring justice to our community!

Oh, I agree on keeping our own lawns in order, however we cannot let the city "flip and spin" the responsibility back on to its residents!! This is an old trick and now its our turn to make the city of Anaheim responsible for its dishonest acts that are happening behind closed doors!

Was this review ... ? Useful Funny Cool

Bookmark Send To A Friend Link to this Review

Locks of Love

Category: Community Service/Non-Profit

2925 10th Ave N
Lake Worth, FL 33461
(561) 963-1677

★☆☆☆☆ 3/27/2010

Do Not donate your hair to Locks of Love! I had it first hand after I had organized several cut a thons that yes they indeed sell their hair. We did our research and found Locks of Love is a non profit that started out "for profit" and has been only giving out a very small amount of wigs and makes it extremely difficult for children to



Kerry has no friends.

No Lists



Kerry hasn't made any lists yet.



Take
An Ad
Survey



Help Us
Help Yelp!

CLICK HERE »

Survey run by a
Yelp advertiser

EXHIBIT "2"

yelp
Real people. Real reviews.

Search for (e.g. taco, cheap dinner, Max's) Near (Address, Neighborhood, City, State or Zip) **San Francisco, CA**

Welcome About Me Write a Review Find Reviews Invite Friends Messaging Talk Events Member Search

Profile Home Lists Reviews Compliments Friends Bookmarks Events

Kerry "LocalWarrior" W.'s Profile



0 Friends
2 Reviews
1 Review Update

Send Compliment
Send Message

Location
Anaheim, CA

Yelping Since
March 2010

Flag this profile

Recent Reviews 2 Reviews

Filter by: Location Category

Search for reviews

Sort by: Date

City of Anaheim

500 W Broadway
Anaheim, CA 92805
(714) 765-1850

Update - 12/10/2010

Investigation on the City of Anaheim? Cheryl Sanders in the planning dept. We all know what is going on in the City of Anaheim planning dept. Our residents are tired of our tax dollars being sunk into the City of Anaheim, into the planning dept and into the friends and family members (sub-contractors) of the employees of the planning department! How much extra "under the table" money is being made from our planning dept???? A nice detailed audit and internal investigation will fix this rather quickly as we have demanded one from our government! We the residents of Anaheim are tired of the Planning Dept. planning for themselves and not our community. We hope that people like Cheryl Sanders are investigated, audited and brought to justice!!!!!! We are tired City of Anaheim and the people are now joining together to bring justice to our community!

Oh, I agree on keeping our own lawns in order, however we cannot let the city "flip and spin" the responsibility back on to its residents!! This is an old trick and now its our turn to make the city of Anaheim responsible for its dishonest acts that are happening behind closed doors!

Was this review ...? Useful Funny Cool

1 Previous Review: Hide »

12/10/2010

Okay Clarke I. probably a friend of Cheryl Sanders in the planning dept. We all know what is going on in the City of Anaheim planning dept. Our residents are tired of our tax dollars being sunk into the City of Anaheim, into the planning dept and into the friends and family members (sub-contractors) of the employees of the planning department! How much extra "under the table" money is being made from our planning dept???? A nice detailed audit and internal investigation will fix this rather quickly as we have demanded one from our government! We the residents of Anaheim are tired of the Planning Dept. planning for themselves and not our community. We hope that people like Cheryl Sanders are investigated, audited and brought to justice!!!!!! We are tired City of Anaheim and the people are now joining together to bring justice to our community!

Oh, I agree on keeping our own lawns in order, however we cannot let the city "flip and spin" the responsibility back on to its residents!! This is an old trick and now its our turn to make the city of Anaheim responsible for its dishonest acts that are happening behind closed doors!

Was this review ...? Useful Funny Cool

Bookmark Send To A Friend Link to this Review

Locks of Love

Category: Community Service/Non-Profit

2925 10th Ave N
Lake Worth, FL 33461
(561) 963-1677

3/27/2010

Do Not donate your hair to Locks of Love! I had it first hand after I had organized several cut a thons that yes they indeed sell their hair. We did our research and found Locks of Love is a non profit that started out "for profit" and has been only giving out a very small amount of wigs and makes it extremely difficult for children to

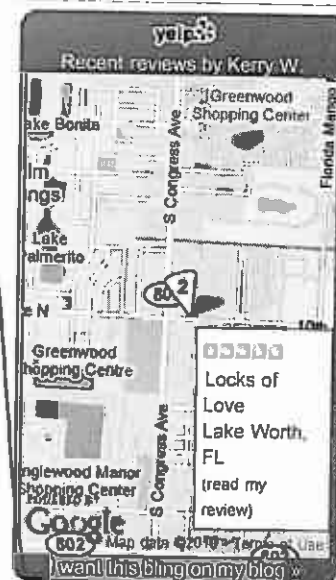


Kerry has no friends.

No Lists



Kerry hasn't made any lists yet.



Take
An Ad
Survey



Help Us
Help Yelp!

CLICK HERE »

Survey run by a
Yelp advertiser

EXHIBIT "3"



City of Anaheim



**1426 E Vermont Ave
Anaheim, CA 92805
714-765-8733**

[Log in or sign up to follow this merchant.](#) [Follow this merchant](#)

'Talk to Me' messages for City of Anaheim

Cheryl Sanders at the City of Anaheim Planning Dept. has been putting up a front long enough. We hope to bring you down soon. Your dishonesty and greediness will soon come to an end.

December 10, 2010 by Jackie

Thank Cheryl Sanders for hurting the community by giving all the construction business in Anaheim for a under the table bribe. I hope that an investigation takes place soon and you end up behind bars

December 10, 2010 by Karen

EXHIBIT "4"



City of Anaheim



**1426 E Vermont Ave
Anaheim, CA 92805
714-765-8733**

[Log in or sign up](#) to follow this merchant. [Follow this merchant](#)

'Talk to Me' messages for City of Anaheim

Cheryl Sanders at the City of Anaheim Planning Dept. has been putting up a front long enough. We hope to bring you down soon. Your dishonesty and greediness will soon come to an end.

December 10, 2010 by Jackie

Thank Cheryl Sanders for hurting the community by giving all the construction business in Anaheim for a under the table bribe. I hope that an investigation takes place soon and you end up behind bars

December 10, 2010 by Karen

EXHIBIT "5"

[Hide Sites](#)

TAGS: lorri galloway

1 Comment

Robert M.

Posted December 12, 2010 at 5:22 PM

City of Anaheim corruption investigating Cheryl Sanders in the planning dept. It's about time someone investigating the fraudulent dealings of Cheryl Sanders in the City's most corrupted dept. Support this internal investigation.

[Reply](#)

Leave a Reply

Name

Mail (will not be published)

Website

XHTML: You can use these tags: `` `<abbr title="">` `<acronym title="">` `` `<blockquote cite="">` `<code>` `<del datetime="">` `` `<i>` `<q cite="">` `<strike>` ``

Submit Comment

Anaheim Urgent Care

Quality, Quick and Affordable Open 7 days/week. Call 714-533-2273



Anaheim Job Openings

Search Our List of Healthcare Jobs. Many Jobs Require Minimal Training.

Ads by Google

Powered by Max Banner Ads

17 18 19 20 21 22 23
24 25 26 27 28 29 30
31

[« Dec](#)

[Feb »](#)

Older Posts Archived By Month

Select Month

Recent Comments

- anon non employee on **[The Wrath of Cole: Willard's "Jaguars For Jesus" principal bans ALL student clubs.](#)**
- anon non employee on **[The Wrath of Cole: Willard's "Jaguars For Jesus" principal bans ALL student clubs.](#)**
- anon on **[The Wrath of Cole: Willard's "Jaguars For Jesus" principal bans ALL student clubs.](#)**
- anon on **[The Wrath of Cole: Willard's "Jaguars For Jesus" principal bans ALL student clubs.](#)**
- tonysera on **[Liberal OC blogger gets booted for lampooning their lawsuit against us.](#)**

Sitemeter

Sitemeter 1,745,901

Advertiser

Official Cheryl's Website

Send Fresh Baked Cookies & More. Free Shipping Available. Order Now!
Cheryls.com

Personal Safety Anaheim

ADT® Quick Connect Alarm System - Only \$99 Installed!
www.ADT.com

Budget Planning

Get the Inside Edge on American Express® Budget Planning.
corp.americanexpress.com/midsized



Ads by Google

Advertiser

EXHIBIT "6"

COMMENTS (7) · RELATED POSTS

[#1](#) by Foster Boy on January 22, 2010
Lorri Galloway Linda Ackerman · Carpal-tapping Lester

[#2](#) by Ling Cod on January 22, 2010
How does a house end up not being zoned for residence?

[#3](#) by Fullerton Realtor on January 22, 2010
Lingo.
It gets re-zoned. Check out all those former single-family houses along the north side of east Chapman between Victoria and Arden.
In the case of that Anaheim deal, those odd houses were moved onto a vacant lot at the corner of Lincoln and East that was probably already zoned for some kind of commercial use.
BTW love the handle. Maybe you should run for City Council!

[#4](#) by SauceBlick on January 22, 2010
This post will appear on Red County and the Register tomorrow, but the credit will go to 'that Fullerton blog'.

[#5](#) by Johnny B on January 22, 2010
What a joke she is. This is exactly why we don't want Lorry in the 4th Sup seat.

[#6](#) by Alive And Well In West Fullerton on January 23, 2010
Just typical. These people sit in power atop all these crazy rules they cooked up for the rest of us to live by.
And then they get a pass. Rest assured, nobody in this big family is going to vote for this Galloway person.
Just another limousine liberal playing de-pooder on somebody else's dime. Now who does that remind me of in Fullerton?

[#7](#) by Elizabeth A. on December 12, 2010
Well from what the community is saying, I hear Cheryl Sanders is the wolf in sheep's clothing and one of the dishonest employees whistling and devising taking advantage of our tax dollars. I was told of a possible internal investigation? If so then I pray the theft become known and their deeds become public and they 'she is brought to justice! I'm so tired of public employees misusing their positions!

Name _____
E-Mail (will not be published) _____
Website _____

Submit Comment

Notify me of followup comments via e-mail

Subscribe without commenting
E-Mail: _____
Subscribe

- NO NEWS IS BAD NEWS
- NOCCCD
- OC FAIR
- OC REGISTER
- OC'S FOURTH DISTRICT
- ORANGE COUNTY CENTRAL COMMITTEE
- ORANGE COUNTY GOVERNMENT
- OUR TOWN
- PAW KELLER
- PARKS AND TRAILS
- PAT MCPENSON
- PHOTO FUN
- REDEVELOPMENT
- REPUBLICANISM
- SETTING THE BAR LOW
- SHARON QUIRK
- SHAWN NELSON
- STATEWIDE STUFF
- SUSTAINABLE DESIGN
- THE FULLERTON RECALL
- THE OBSERVER
- TOM DALY
- UNION GOONS
- VICTORY
- WATCH YOUR WALLET

RECENT COMMENTS

- Joe Spivovitz on [Pat McPenson Calls Lizard-Boiled](#)
- Anonymous on [Fullerton Fire Hazard Goes Wild](#)
- Curious on [Sanctified Thieves: Hissy Fit](#)
- admin on [Sanctified Thieves: Hissy Fit](#)
- Curious on [Sanctified Thieves: Hissy Fit](#)
- Rolan Chi's Auntie on [Sanctified Thieves: Hissy Fit](#)
- Rain on [Sanctified Thieves: Hissy Fit](#)
- Mumbles on [Sanctified Thieves: Hissy Fit](#)

OUR BLOGGERS

- Admin
- The Fullerton Harrison
- Travis Papp
- Grover Cleveland
- The Fullerton Shallows
- Mr. Peabody
- Joe Simpson
- Jan. Jorja Day
- The Desert Rat
- Christian
- Joshua The Bushido Poet
- Grep Sebourn
- theburnsmuska

BLOGROLL

- Cal Watchdog
- Inside Fullerton
- Martha Montelongo Blog
- OC Weekly
- PensionTsunami
- Repton