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Attorney for Plaintiffs BRUCE BOYER, individually
and on behalf of SONS OF LIBERTY LA,
an unincorporated association

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

BRUCE BOYER, individually and on
behalf of SONS OF LIBERTY LA, an
unincorporated association,

Plaintiffs,

vs.

CITY OF LOS ANGELES,

Defendant.

Case No.:

CV12-04005-GAF-FFM

COMPLAINT FOR DECLARATORY
RELIEF AND INJUNCTIVE RELIEF
UNDER 42 U.S.C. §1983

JURY TRIAL REQUEST

Comes now Plaintiff BRUCE BOYER, individually and on behalf of
SONS OF LIBERTY LOS ANGELES, an unincorporated association, and for
claims against defendant CITY OF LOS ANGELES alleges as follows:

1. Jurisdiction and Venue -- The claims alleged in this Complaint arise
under the First, Second and Fourteenth Amendments to the United States
Constitution; the Civil Rights Act of 1871, 42 U.S.C. §1983; and the Declaratory
Judgment Act, 28 U.S.C. §2201. The Court has subject matter jurisdiction over

1 this matter pursuant to 28 U.S.C. §1331, on the ground that this Complaint
2 presents a substantial federal question, and pursuant to 28 U.S.C. §1343(a)(3) on
3 the ground that this Complaint seeks redress for the deprivation of rights secured
4 by the Constitution of the United States under color of State law, including
5 without limitation the right not to be deprived of liberty interests without due
6 process of law, the rights of assembly and petition for redress of grievances, and
7 the right to engage in speech activity on matters of public interest. Venue is
8 proper in the Central District of California pursuant to 28 U.S.C. §1391(b), on the
9 ground that substantially all events underlying this Complaint occurred within
10 that District in the County of Los Angeles, State of California.

11 2. Plaintiff BRUCE BOYER is an individual residing within Los
12 Angeles County, California. Plaintiff brings this action on his own behalf, and on
13 behalf of SONS OF LIBERTY LA, an unincorporated association in the Los
14 Angeles community formed for the purpose of advocating and advancing that
15 cause of Constitutional rights and liberties, including particularly the rights
16 recognized and protected under the First, Second, Fourth and Fourteenth
17 Amendments of the Constitution of the United States. Bruce Boyer and Sons of
18 Liberty LA are referred to collectively in this complaint as "Plaintiffs."

19 3. Defendant CITY OF LOS ANGELES (referred to in this Complaint
20 as "the City") is a municipality chartered and existing under the laws of the State
21 of California and is a political subdivision of the State of California.

22 4. Beginning in or about the year 2009, the City, under the auspices of
23 the Office of the Mayor and the Los Angeles Police Department, has sponsored
24 and conducted a series of "Gun Buy Back" events. Typically, these events have
25 been held at various locations around the City of Los Angeles on a Saturday in

1 mid-May. In late April, 2012, the City announced that it will conduct a Gun Buy
2 Back event at six stated locations on Saturday, May 12, 2012, between the hours
3 of 9:00 a.m. and 3:00 p.m. At City-sponsored Gun Buy Back events, the City
4 invites members of the public to come to the identified locations and to transfer
5 possession of one or more firearms to the City, “no questions asked.” In
6 exchange, the City gives to each person presenting firearms for collection a “gift
7 card” usable at an identified merchant. In 2012, as in prior years, the gift cards are
8 issued by and usable at Ralphs Grocery stores; the City is offering a \$100 gift
9 card for handguns, shotguns and rifles and a \$200 gift card for “assault weapons
10 as classified in the State of California.” The City claims ownership of any
11 firearms presented to it at Gun Buy Back events; the City’s stated practice is to
12 check each surrendered firearm to determine whether it can be identified as lost or
13 stolen, and for the Los Angeles Police Department to destroy any and all other
14 firearms received. Plaintiffs are informed and believe and on that basis allege that
15 this stated practice is not followed in every case, and that some firearms are
16 neither returned to their rightful owners nor destroyed.

17 5. Plaintiffs have contended from the inception of the City’s Gun Buy
18 Back events that those events are unwise as a matter of public policy, that the
19 events and the manner in which firearms are handled at and disposed of following
20 those events may be unlawful, that the policy underlying Gun Buy Back events—
21 of encouraging citizens to disarm—is counterproductive to the goal of
22 heightening public safety, that rather than destroying surrendered firearms the
23 more prudent policy would be to see to it that those firearms are lawfully and
24 safely transferred to citizens who can and will use them for their personal safety,
25

1 and that the Gun Buy Back program is counter to the individual right to bear arms
2 confirmed by the Second Amendment to the Constitution.

3 6. In order to express their views concerning Gun Buy Back events,
4 plaintiffs have since 2010 appeared in the vicinity of those events in order to
5 communicate an opposing viewpoint to participants and to offer those persons
6 arriving with firearms and alternative means of disposing of them. Specifically,
7 members of Sons of Liberty LA have attempted to attend Gun Buy Back events
8 accompanied by signs and wearing statements of their views on their clothing,
9 and have attempted to communicate with others present at those events. The City
10 has consistently and persistently taken measures to prevent the attendance,
11 assembly, and speech activities of plaintiffs, by methods including refusal of
12 access to the event and its vicinity, and the direct threat of unauthorized arrest by
13 officers of the Los Angeles Police Department. Plaintiff Bruce Boyer was
14 personally arrested for "trespassing" at the Gun Buy Back event in Hollywood in
15 2010 as he attempted to enter the event site on foot, through its designated
16 entrance, and to converse with participants. Other members of Sons of Liberty
17 LA have been threatened with arrest without cause merely for being near an event
18 site, and some have elected not to attend Gun Buy Back events to express their
19 views because of their fear of unlawful arrest.

20 7. When they have been present near Gun Buy Back events, members
21 and representatives of Sons of Liberty LA have attempted to communicate to
22 persons who might otherwise surrender their firearms in exchange for a gift card
23 that there are alternative courses available to them for the disposition of those
24 firearms. Specifically, Sons of Liberty LA offers information and assistance so
25 that those who wish to do so can instead present firearms to duly licensed

1 firearms dealers for valuation and sale, frequently for sums substantially in excess
2 of the nominal amounts being proffered via gift cards by the City. Any and all
3 such private transactions are to be conducted in compliance with all applicable
4 laws of the United States and the State of California; following those transactions,
5 the subject firearms can either be lawfully resold or can be donated, again in
6 compliance with all laws and regulations, to others, particularly to women who
7 need and desire a firearm for purposes of self defense. The City, which disagrees
8 with the plaintiffs' policy views, has characterized plaintiffs as "solicitors"—
9 although the City itself is also proposing a "commercial" transaction in its
10 exchange of gift cards for firearms. On May 11, 2010, following the Gun Buy
11 Back event at which plaintiff Boyer was arrested, Police Commission Vice
12 President Alan Skobin addressed the Commission to express concern over the
13 presence of "solicitors." As reported in the *LAPD Blog*, "Commissioner Skobin
14 instructed the [Los Angeles Police] Department to look into the legality of the
15 solicitors *and insure they are not present for the next Buy Back event*" (Emphasis
16 added.) Plaintiffs are informed and believe that it is the official policy of the City
17 of Los Angeles that they in particular, and the view points that they seek to
18 express by their attendance at Gun Buy Back events, should be silenced to the
19 extent possible.

20 8. Following the announcement of the Gun Buy Back events to be held
21 on May 12, 2012, in an effort to protect themselves from the threat of arrest,
22 plaintiffs have contacted authorized representatives of the City seeking to obtain
23 permission to be present at or immediately adjacent to the scheduled Gun Buy
24 Back events so that they may participate meaningfully and have a fair opportunity
25 to communicate with attendees, to convey their point of view on the law and

1 policy surrounding the events, and to convey information concerning alternatives
2 to the surrender of firearms to the City. The Office of the Mayor, when contacted,
3 deferred to the Los Angeles Police Department, stating that the Department is
4 responsible for all "operational" issues. Plaintiff Boyer has spoken with LAPD
5 Detective Tompkins, the Officer in charge. Detective Tompkins, for the City, has
6 declined to permit or authorize access, stating that the only members of the public
7 permitted entry are those who are arriving with one or more firearms to transfer
8 or surrender. (This statement is not precisely true, as the Department also permits
9 entry to elected and appointed officials, the invitees and guests of such officials,
10 and media representatives.) Detective Tompkins has further conveyed that
11 plaintiffs and other members of the public are prohibited from adjacent sidewalk
12 areas. He has not granted permission, on behalf of the City, for the presence of
13 signs. Although Det. Tompkins has claimed that signs would be permissible, past
14 experience is to the contrary: plaintiff Boyer was convicted (the conviction is
15 under review) of a misdemeanor under the general "sign ordinance" provisions of
16 the Los Angeles Municipal Code expressly based upon his having a sign in his
17 possession and control at the time of his arrest at the 2010 Hollywood Gun Buy
18 Back event. Absent express permission, which the City has declined to provide,
19 plaintiffs can have no confidence that the presence of signs will not lead to their
20 arrest. Detective Tompkins has informed plaintiff Boyer that there is no written
21 policy for the conduct of the Gun Buy Back event, and that operation of the event
22 lies entirely within the discretion of the Los Angeles Police Department. Plaintiffs
23 do not seek or propose to prevent any person from fully participating in the Gun
24 Buy Back by surrendering firearms, nor do plaintiffs seek or propose to interfere
25 in any way with the safe, orderly and lawful processing of any such surrender of

1 firearms by a willing participant. Plaintiffs seek only a meaningful opportunity to
2 convey, to any willing listener, plaintiffs' point of view concerning the Gun Buy
3 Back and alternative means by which attendees can safely and lawfully dispose of
4 unwanted firearms.

5 9. Plaintiffs having been denied permission to attend and participate in
6 a meaningful fashion in the 2012 Gun Buy Back events, and plaintiffs having
7 been explicitly threatened with arrest should they be present at past events, a
8 controversy has arisen and exists between plaintiffs and defendant concerning
9 plaintiffs' rights and privileges under the laws and Constitution of the United
10 States, and particularly concerning plaintiffs' exercise of their rights to assembly
11 and free expression of their views. A declaratory judgment is necessary and
12 appropriate to resolve these disputes, for which there is no other meaningful
13 remedy at law. Further, in view of the defendant City's refusal to grant
14 permission, on any terms, for plaintiffs to engage in the proposed speech
15 activities in conjunction with the Gun Buy Back events, injunctive relief is
16 necessary and appropriate to declare and enforce plaintiffs' rights. Specifically,
17 plaintiffs seek a restraining order and preliminary and permanent injunctions of
18 this Court directing the City (1) to allow plaintiffs to be present at the Gun Buy
19 Back event sites, to enter those sites on foot, by wheelchair, or by other means
20 apart from a motor vehicle, and to be present without plaintiffs themselves
21 possessing or surrendering a firearm, (2) to allow plaintiffs' presence at a place
22 and in a manner that provides opportunity for plaintiffs to speak with and
23 communicate their views to other attendees prior to those attendees surrendering
24 firearms, (3) to maintain possession of surrendered firearms and not to destroy
25 them and to dispose of them only in the manner authorized by the Los Angeles

1 Municipal Code for the disposition of “surplus City property,” (4) to determine
2 whether any surrendered firearms may be evidence of a criminal act and to submit
3 such evidence to the appropriate prosecutorial authority for a determination
4 whether a prosecution should be pursued, and (5) to permit plaintiffs access to
5 press conferences and other media opportunities relating to Gun Buy Back events
6 on a par with that access provided to other members of the public and press.

7 WHEREFORE, plaintiffs pray judgment as follows:

8 1. For entry of a judgment declaring the rights of plaintiffs and others
9 similarly situated to be granted access to and meaningful participation in current
10 and future Gun Buy Back events for purposes of expressing their views;

11 2. For a temporary restraining order, preliminary injunction and a
12 permanent injunction, all enjoining and requiring defendant, and its agents,
13 employees and all persons acting under, in concert with, or for it (1) to allow
14 plaintiffs to be present at the Gun Buy Back event sites, to enter those sites on
15 foot, by wheelchair, or by other means apart from a motor vehicle, and to be
16 present without plaintiffs themselves possessing or surrendering a firearm, (2) to
17 allow plaintiffs’ presence at a place and in a manner that provides opportunity for
18 plaintiffs to speak with and communicate their views to other attendees prior to
19 those attendees surrendering firearms, (3) to maintain possession of surrendered
20 firearms and not to destroy them and to dispose of them only in the manner
21 authorized by the Los Angeles Municipal Code for the disposition of “surplus
22 City property,” (4) to determine whether any surrendered firearms may be
23 evidence of a criminal act and to submit such evidence to the appropriate
24 prosecutorial authority for a determination whether a prosecution should be
25 pursued, and (5) to permit plaintiffs access to press conferences and other media

1 opportunities relating to Gun Buy Back events on a par with that access provided
2 to other members of the public and press.


3 3. For an award of attorney's fees, pursuant to 42 U.S.C. §1988;

4 4. For costs of suit incurred in this action; and

5 5. For such other and further relief as the Court deems just and proper.

6
7 DATED: May 8, 2012

WALLACE, BROWN & SCHWARTZ

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9 
10 by GEORGE M. WALLACE
11 Attorneys for Plaintiffs BRUCE BOYER,
12 individually and on behalf of SONS OF
13 LIBERTY LA, an unincorporated
14 association
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REQUEST FOR JURY TRIAL

Plaintiff requests trial by jury in this action, to the extent authorized by law.

DATED: May 8, 2012

WALLACE, BROWN & SCHWARTZ



by GEORGE M. WALLACE
Attorneys for Plaintiffs BRUCE BOYER,
individually and on behalf of SONS OF
LIBERTY LA, an unincorporated
association

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Gary A. Feess and the assigned discovery Magistrate Judge is Frederick F. Mumm.

The case number on all documents filed with the Court should read as follows:

CV12- 4005 GAF (FFMx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

===== :
NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

Name & Address:

George M. Wallace -- Cal. Bar No. 101472
 WALLACE, BROWN & SCHWARTZ
 215 N. Marengo Avenue, 3rd Floor
 Pasadena, California 91101
 (626) 844-6777; Fax 626) 795-0353

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

BRUCE BOYER, individually and on behalf of SONS
 OF LIBERTY LA, an unincorporated association,

PLAINTIFF(S)

v.

CITY OF LOS ANGELES

DEFENDANT(S).

CASE NUMBER

CV12-04005 GAF/FFM

SUMMONS

TO: DEFENDANT(S): CITY OF LOS ANGELES

A lawsuit has been filed against you.

Within _____ days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ _____ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, George M. Wallace, whose address is 215 N. Marengo Ave., 3rd Floor, Pasadena, California 91101. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: MAY - 8 2012

By: JULIE PRADO

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) BRUCE BOYER, individually and on behalf of SONS OF LIBERTY LA, an unincorporated association,	DEFENDANTS CITY OF LOS ANGELES
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) George M. Wallace, WALLACE, BROWN & SCHWARTZ 215 N. Marengo Ave., 3rd Floor, Pasadena, CA 91101 (626) 844-6777; fax (626) 795-0353	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 1</td> <td style="width:10%;">DEF <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input type="checkbox"/> 2</td> <td>DEF <input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td>PTF <input type="checkbox"/> 5</td> <td>DEF <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> 3</td> <td>DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> 6</td> <td>DEF <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6
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IV. ORIGIN (Place an X in one box only.) <input checked="" type="checkbox"/> 1 Original Proceeding <input type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from another district (specify): <input type="checkbox"/> 6 Multi-District Litigation <input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judge
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V. REQUESTED IN COMPLAINT: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (Check 'Yes' only if demanded in complaint.)	CLASS ACTION under F.R.C.P. 23: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No MONEY DEMANDED IN COMPLAINT: \$ _____
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VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.) 42 U.S.C. 1983 -- injunctive and declaratory relief re plaintiffs' access to and exercise of 1st Amendment rights re City-sponsored "Gun Buy Back" events
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VII. NATURE OF SUIT (Place an X in one box only.) <table style="width:100%;"> <tr> <td style="width:16.6%;"> OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. 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Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property </td> <td style="width:16.6%;"> TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. 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Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609 </td> </tr> </table>	OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. 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Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 Habeas Corpus General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609	

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FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.
- ☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.
- ☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.

Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involvedX. SIGNATURE OF ATTORNEY (OR PRO PER): _____ Date May 8, 2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))