JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The 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, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

Ex. 6 - Personal Privacy

DEFENDANTS

John Izbicki; Patty Kouyoumdjian: Lauri Kemper; Lisa Dembach; Anne Holden; Ray Britain; and DOES 1-100, inclusive

(b) County of Residence of First Listed Plaintiff Clark
(EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant San Diego
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys *(Firm Name, Address, and Telephone Number)*

Attorneys *(If Known)*

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question *(U.S. Government Not a Party)*
- ☐ 2 U.S. Government Defendant
- ☒ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant) (For Diversity Cases Only)*

	PTF	DEF		PTF	DEF
Citizen of This State	☒ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☒ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS
- ☒ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☐ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 840 Trademark

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

V. ORIGIN *(Place an "X" in One Box Only)*

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District *(specify)*
- ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:
Civil Rights Complaint Pursuant to 42 U.S.C.1983. Diversity and Personal Jurisdiction, sufficient minimum contacts

Brief description of cause:
Violation of Civil Rights by using "color of law"/Eenvironmental Justice laws. Conspiracy to violate Clean Water Act

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND $

CHECK YES only if demanded in complaint:
JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY *(See instructions)*:

JUDGE _____ DOCKET NUMBER _____

Ex. 6 - Personal Privacy

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

Robert Richards and Olga Richards
5200 Garcia Court
Las Vegas, Nevada 89130
Phone: 702-760-6146

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
SOUTH DISTRICT OF NEVADA - LAS VEGAS

Ex. 6 - Personal Privacy Plaintiffs,	**CASE NO.** 2:16-cv-00346-JCM-PAL (To be supplied by the Clerk)
vs.	
John Izbicki; Patty Kouyoumdjian; Laury Kemper; Lisa Dernbach; Anne Holden; Ray Britain; and DOES 1 – 100, inclusive, Defendants.	**CIVIL RIGHTS COMPLAINT PURSUANT TO 42 U.S.C. 42 § 1983 42 U.S.C. §1985(3) 42 U.S.C. §1986** **INJUNCTIVE RELIEF DEMANDED** **JURY TRIAL DEMANDED**

A. JURISDICTION

1) This complaint alleges that the civil rights of Plaintiffs Ex. 6 - Personal Privacy who presently resides at Ex. 6 - Personal Privacy were violated by the actions of the below named individuals, acting in his/hers individual and/or in official capacity which were directed against the Plaintiffs, at Hinkley, CA 92347, as of June 19, 2014, to the following dates

February 15, 2016 (Count I), February 15, 2016 (Count II), February 15, 2016 (Count III)

This Complaint does not seek any monetary or legal cost's damages from Defendants, regardless that public welfare, especially of the poor and underprivileged Plaintiffs, has never been a concern by the Defendants, regardless of alleged conspiracy acts committed by Defendants, and regardless of the failure to prevent alleged conspiracy committed by Defendants. This Complaint must be deliberated be Jury, thus Jury Trial demanded with demand for Injunctive Relief and only seeks from Defendants to finally concede that **"ground drinking water within Hinkley's aquifers is not safe to drink"**

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The lawsuit does not attempt to circumvent immunity, and therefore forward-thinking judge should be open to the constitutional arguments, or open to arguments based upon civil rights challenges that are based on statutes, rather than the Constitution, and instruct the jury accordingly.

2) Defendant John Izbicki resides or work at 4165 Spruance Road, Su. 200, San Diego CA 92101
(full name of first defendant) (address if first defendant)

and is employed as Research Hydrologist by USGS. This defendant is sued in his
(defendant's position and title, if any)

__X_individual, and/or _X__official capacity. (Check one or both). Explain how this defendant was acting under color of law:

It is alleged that John Izbicki has committed federal crime, Section 242 of Title 18, by acting under "color of law" and willfully deprive and conspire to deprive Plaintiffs of a right protected by the Constitution and/or U.S. law and/or Environmental Justice laws.

In specific, by pretending to act in the performance of his official duties, it is alleged that John Izbicki has not only acted with intentional gross negligence, but has conspired with State of California Lahontan Regional Water Quality Control Board's employees Patty Kouyoumdjian; Laury Kemper; Lisa Dernbach; Anne Holden and with United States Geological Survey treasurer, alleged to have accepted bribe in the amount of over Four and Half Million Dollars from Pacific Gas and Electric Company (PG&E), for, alleged as felonious, investigation and report, that will be totally worthless according to several scientists contradicting Izbicki and Water Board's employees' assertions.

Such, further alleged as fraudulent, incomprehensible, vague and ambiguous investigation and report, which cannot prove how much the aquifers beneath the town of Hinkley, CA 92347 and beneath the Plaintiffs real property is saturated with naturally occurring Hexavalent Chromium, or is poisoned by PG&E with Hexavalent Chromium, due to massive dilution with other chemicals and substances, injected in such aquifers by PG&E, under the pretext that such will remove the Hexavalent Chromium, being all aquifers beneath the town of Hinkley, CA 92347, poisoned since 1952.

In fact, such aquifers are now exhibiting higher concentration of not only Hexavalent Chromium,

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over 5,000 ppb, now construed as hazardous waste, but with way over the legal limits (Maximum Contaminant level) with Arsenic and Uranium, due to failed remedial operations by PG&E. Furthermore, under the color of law, John Izbicki has confessed, in fact has confessed to the server of this lawsuit, that "I will get my millions and retire next year", despite his contractual obligation, being for the duration of five years with the Boards employees named herein this Complaint. Such acts under the color of law has precluded any meaningful, complete and unconditional investigation of poisoned aquifers with Arsenic and Uranium and therefore has violated the Plaintiffs' Civil Rights, the inherent Constitutional rights that prevent government employees from taking away life, liberty or property without due process, the Environmental Justice laws protecting the Plaintiffs who are below the poverty level, and has violated, as well, the Safe Drink Water Act and the Federal Clean Water Act. The Safe Drinking Water Act (the Act), 42 U.S.C. § 300 *et seq.*, is the federal law that protects Americans from harmful contaminants in their drinking water.

3) Defendant Patty Kouyoumdjian resides or work at, and has some presence in the offices of the Lahontan Regional Water Quality Control Board at 14440 Civic Dr #200, Victorville, CA 92392 and is employed as executive officer within the staff of the Lahontan Regional Water Quality Control Board. This defendant is sued in her _____individual ___X__ official capacity.

Explain how this defendant was acting under color of law: It is alleged that Patty Kouyoumdjian has committed federal crime, Section 242 of Title 18, by acting under "color of law" and willfully deprive and conspire to deprive the Plaintiffs of a right protected by the Constitution and/or U.S. law and/or Environmental Justice laws.

In specific, an extremely carefully worded letter sent to other residents from Hinkley, CA 92347, has exhibited not only extreme intentional negligence, but unscrupulous assertions promulgating that drinking water in Hinkley is safe to drink.

Ground Drinking Water in Hinkley's Aquifers is not safe to drink.

Hundreds of test by three state certified analytical laboratories has confirmed that at the Aquifers

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beneath the town of Hinkley, and the respective ground drinking water are poisoned with Arsenic at huge concentration (up to 7,000 % over the legal limit / over maximum contaminant level set by EPA), and per over 200 laboratory's tests by ARCADIS, a company hired by PG&E, has confirmed that Aquifers beneath the town of Hinkley and the respective ground drinking water are poisoned with Uranium at concentration as high as 500% over the legal limit.

It is further alleged that Patty Kouyoumdjian has committed another federal crime, Section 242 of Title 18, by acting under "color of law" and willfully deprive and conspire to deprive the Plaintiffs of right protected by the Constitution and/or U.S. law and/or Environmental Justice laws.

In specific, by pretending to act in the performance of her official duties, it is alleged that Patty Kouyoumdjian has not only acted with intentional gross negligence, but has conspired with John Izbicki and Pacific Gas and Electric Company (PG&E), alleged to have accepted bribe in the amount of over Four and Half Million Dollars from Pacific Gas and Electric Company (PG&E), for, alleged as felonious, investigation and report, that will be totally worthless according to several scientist who has contradicted Izbicki's assertions.

Furthermore, this Defendant has exhibited, also under the color of law, cover-up and concealment of fact's acts and has expanded maximum efforts to shield PG&E from full and unconditional investigation, sought to be aimed in the discovery of the failed PG&E's Agricultural and In-Situ operations, causing huge additional poisoning of Hinkley's aquifers and the respective ground drinking water within, with Arsenic and Uranium, resulting to her unjust enrichment, at the expense of the Plaintiffs' massive health damages.

Such acts under the color of law has precluded any meaningful, complete and unconditional investigation of poisoned aquifers with Arsenic and Uranium and therefore has violated the Plaintiffs' Civil Rights, the inherent Constitutional rights that prevent government employees from taking away life, liberty or property without due process, the Environmental Justice laws protecting the Plaintiffs who are below the poverty level, and has violated, as well, the Safe Drink Water Act and the Federal

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Clean Water Act. The Safe Drinking Water Act (the Act), 42 U.S.C. § 300 *et seq.*, is the federal law that protects Americans from harmful contaminants in their drinking water.

4) Defendant Laury Kemper resides or work at, and has some presence in the offices of the Lahontan Regional Water Quality Control Board at 14440 Civic Dr #200, Victorville, CA 92392 employed as assistant executive officer within the staff of the Lahontan Regional Water Quality Control Board. This defendant is sued in her ___X__individual, and/or ___X__ official capacity. Explain how this defendant was acting under color of law: It is alleged that Laury Kemper has committed federal crime, Section 242 of Title 18, by acting under "color of law" and willfully deprive and conspire to deprive the Plaintiffs of a right protected by the Constitution and/or U.S. law and/or Environmental Justice laws.

Furthermore, this Defendant has exhibited, also under the color of law, not only acts with intentional gross negligence, but cover-up and concealment of facts acts and has expanded maximum efforts to shield PG&E from full and unconditional investigation, sought to be aimed in the discovery of the failed PG&E's Agricultural and In-Situ operations, causing huge additional poisoning of Hinkley's aquifers and the respective ground drinking water within, with Arsenic and Uranium, resulting to her unjust enrichment, at the expense of the Plaintiffs' massive health damages.

Such acts under the color of law has precluded any meaningful, complete and unconditional investigation of poisoned aquifers with Arsenic and Uranium and therefore has violated the Plaintiffs' Civil Rights, the inherent Constitutional rights that prevent government employees from taking away life, liberty or property without due process, the Environmental Justice laws protecting the Plaintiffs who are below the poverty level, and has violated, as well, the Safe Drink Water Act and the Federal Clean Water Act. The Safe Drinking Water Act (the Act), 42 U.S.C. § 300 *et seq.*, is the federal law that protects Americans from harmful contaminants in their drinking water.

5) Defendant Lisa Dernbach resides or work at, and has some presence in the offices of the Lahontan Regional Water Quality Control Board at 14440 Civic Dr #200, Victorville, CA 92392

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and is employed as Senior Engineering Geologist within the staff of the Lahontan Regional Water Quality Control Board. This defendant is sued in her __X___individual, and/or ___X__ official capacity. Explain how this defendant was acting under color of law: It is alleged that Lisa Dernbach has committed federal crime, Section 242 of Title 18, by acting under "color of law" and willfully deprive and conspire to deprive the Plaintiffs of a right protected by the Constitution and/or U.S. law and/or Environmental Justice laws.

Furthermore, this Defendant has exhibited, not only acts with intentional gross negligence, also under the color of law, but cover-up and concealment of facts acts and has expanded maximum efforts to shield PG&E from full and unconditional investigation, sought to be aimed in the discovery of the failed PG&E's Agricultural and In-Situ operations, causing huge additional poisoning of Hinkley's aquifers and the respective ground drinking water within, with Arsenic and Uranium, resulting to her unjust enrichment, at the expense of the Plaintiffs' massive health damages.

Such acts under the color of law has precluded any meaningful, complete and unconditional investigation of poisoned aquifers with Arsenic and Uranium and therefore has violated the Plaintiffs' Civil Rights, the inherent Constitutional rights that prevent government employees from taking away life, liberty or property without due process, the Environmental Justice laws protecting the Plaintiffs who are below the poverty level, and has violated, as well, the Safe Drink Water Act and the Federal Clean Water Act. The Safe Drinking Water Act (the Act), 42 U.S.C. § 300 *et seq.*, is the federal law that protects Americans from harmful contaminants in their drinking water.

6) Defendant Anne Holden resides or work at, and has some presence in the offices of the Lahontan Regional Water Quality Control Board at 14440 Civic Dr #200, Victorville, CA 92392 and is employed as Engineering Geologist within the staff of the Lahontan Regional Water Quality Control Board .This defendant is sued in her __X___individual, and/or ___X__ official capacity. Explain how this defendant was acting under color of law: It is alleged that Anne Holden has

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committed federal crime, Section 242 of Title 18, by acting under "color of law" and willfully deprive and conspire to deprive the Plaintiffs of a right protected by the Constitution and/or U.S. law and/or Environmental Justice laws. Furthermore, this Defendant has exhibited, not only acts with intentional gross negligence, also under the color of law, cover-up and concealment of facts acts and has expanded maximum efforts to shield PG&E from full and unconditional investigation, sought to be aimed in the discovery of the failed PG&E's Agricultural and In-Situ operations, causing huge additional poisoning of Hinkley's aquifers and the respective ground drinking water within, with Arsenic and Uranium, resulting to her unjust enrichment, at the expense of the Plaintiffs' massive health damages.

Such acts under the color of law has precluded any meaningful, complete and unconditional investigation of poisoned aquifers with Arsenic and Uranium and therefore has violated the Plaintiffs' Civil Rights, the inherent Constitutional rights that prevent government employees from taking away life, liberty or property without due process, the Environmental Justice laws protecting the Plaintiffs who are below the poverty level, and has violated, as well, the Safe Drink Water Act and the Federal Clean Water Act. The Safe Drinking Water Act (the Act), 42 U.S.C. § 300 *et seq.*, is the federal law that protects Americans from harmful contaminants in their drinking water.

7) Defendant Ray Britain resides or work at, 385 N Arrowhead Ave, San Bernardino, CA 92415 and is employed as Interim Chief of Environmental Health Services, County of San Bernardino, California. This defendant is sued in his __X___individual, and/or ___X__ official capacity. Explain how this defendant was acting under color of law: It is alleged that Ray Britain has committed federal crime, Section 242 of Title 18, by acting under "color of law" and willfully deprive and conspire to deprive the Plaintiffs of a right protected by the Constitution and/or U.S. law and/or Environmental Justice laws. Furthermore, this Defendant has exhibited, not only acts with intentional gross negligence, also under the color of law, cover-up and concealment of facts acts and

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has expanded maximum efforts to shield PG&E from full and unconditional investigation, in specific, has instructed all the environmental health inspectors within his department to filter all sampled water and such fraudulent acts of filtered water was, by chain of custody, tested by analytical laboratories, and obviously, no, or little contamination was exhibited.

There are no such filter attached to any well and his refusal to sample the ground drinking water from the aquifer on the basis of "as-is and where-is" has resulted in the massive fraud of this century by government employees, and such notorious acts under the color of law has caused huge additional poisoning of Hinkley's aquifers and the respective ground drinking water within, with Arsenic and Uranium, resulting to Plaintiffs' massive health damages. Such acts under the color of law has precluded any meaningful, complete and unconditional investigation of poisoned aquifers with Arsenic and Uranium and therefore has violated the Plaintiffs' Civil Rights, the inherent Constitutional rights that prevent government employees from taking away life, liberty or property without due process, the Environmental Justice laws protecting the Plaintiffs who are below the poverty level, and has violated, as well, the Safe Drink Water Act and the Federal Clean Water Act. The Safe Drinking Water Act (the Act), 42 U.S.C. § 300 *et seq.*, is the federal law that protects Americans from harmful contaminants in their drinking water.

7) **Jurisdiction is invoked pursuant to 28 U.S.C. § 1343 (a)(3) and 42 U.S.C. § 1983.**
(If you wish to assert jurisdiction under different or additional statutes, list them below).

The **personal jurisdiction** is based upon **"sufficient minimum contacts"** in which the out-of-state defendants, the named herein this Complaint lower level employees from local, State of California and from the United States government, should have known that their acts would likely make them have to defend a suit in the U.S. District Courts throughout the U.S. , by acting in their official capacity. During the past one year, thousands pages of papers were transmitted to the Defendants, clearly identifying the Plaintiffs' address in Nevada, thus more than sufficient minimum contacts.

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The **"sufficient minimum contacts"** are actually based upon the undisputable facts, being the massive volume of correspondence aimed at the Defendants, inclusive but not limited to massive volume of information, including criminal information, identified as massive volume of evidentiary exhibits, enumerated and/or otherwise comprised of over then thousand pages, and demands for action sought against those defendants , transmitted for the past one year to:

White House, President of the United States; to California and US Senators; to Congressmen and Congresswomen; to Assembly Members; to Federal Bureau of Investigation; to California Attorney General , Department of Justice; to United States Attorney General, U.S. Department of Justice; to California Environmental protection Agency (CAL/EPA); to United States Environmental Protection Agency (U.S. EPA); to the various EPA's agencies, including but not limited to the Office of Environmental health Hazard, California Department of Toxic Substances Control Board; to California State Auditor; to Comptroller General of U.S.; to Federal Energy Regulatory Commission; to California Public Utilities Commission; to County of San Bernardino District Attorney; to County of San Bernardino Sheriffs; in the cumulative also triggering the doctrine of fully exhausted administrative remedy. This Complaint is to be exclusively decided by Jury and the Jury Trial should be scheduled as soon as there available dates on the calendar.

Due to diversity jurisdiction, this case must be deliberated exclusively by the Jury with verdict demanded from the Jury (No bench trial).

The jurisdiction and venue are proper, further in light of the fact that the Plaintiffs are near death, with cancer surgery scheduled on February 22, 2016 and cannot have their case herd in California.

Diversity jurisdiction as a form of subject-matter jurisdiction. Plaintiff has a domicile in Nevada, due to bean near death, caused by poisoned by Pacific Gas and Electric Company (PG&E) ground drinking water within aquifer beneath Plaintiffs residence with Arsenic and by the intentional negligence act of Defendants by not forcing PG&E to clean up and were evacuated therefrom over six months ago. Plaintiffs are subjected to cancer surgery on February 22, 2016, and survival is grim.

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B. NATURE OF THE CASE

Briefly state the background of your case.

Plaintiffs move the Court to establish a prima facie case under 42 U.S.C. §1983, and prove that the Defendant's conduct was a cause in fact of the deprivation of the Plaintiff's federal rights. Plaintiffs move to Court, Under §1985(3), to allege four elements aimed to constitute a valid cause of action: (1) a conspiracy; (2) a purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws or of equal privileges and immunities under the laws; (3) an act in furtherance of the conspiracy; and (4) an injury to a person or property or a deprivation of any right or privilege of a citizen of the United States, and Under 42 U.S.C. §1986, which creates a cause of action for the failure to prevent a conspiracy within the meaning of 42 U.S.C. §1985.

The only demand by the Plaintiffs is that the Jury finds that Defendant must concede to the undisputable fact that the **"Ground Drinking Water in Hinkley's Aquifers is Not Safe to Drink"**, base upon review of myriad of evidentiary exhibit presented immediately to them by the Plaintiffs, upon instant request, and the Court issues the sought Injunctive Relief, restraining the Defendants to further promulgate that the "Ground Dinking Water in Hinkley's Aquifers is Safe To Drink", due to being poisoned with Arsenic and/or Uranium, in addition to with Hexavalent Chromium.

The Civil Rights Complaint seeks jury verdict against those lower level government employees, compelling such employees to cease and desist violating the laws of the Federal Clean Water Act (CWA) 33 U.S.C. §1251 et seq. (1972) and the laws of the California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65) as amended by AB 227, Violation of Section 25249.5 or 25249.6. The lawsuit is a CIVIL RIGHTS COMPLAINT (42 U.S.C §1983, §1985), for infringement of the U.S. Constitution and violation of the Plaintiffs (Victims) civil rights and civil rights laws, violation of Environmental Justice laws, a civil rights challenges based on statutes, and seeks jury

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verdict against those lower level officials, the named therein employees from local, State and Federal governments, to refrain from shielding and protecting corporate interest Pacific Gas and Electric Company (PG&E) and their executives, those accomplices and those acting in concert with PG&E, a California corporation and the corporation's executives, who has caused poisoning of the Aquifers and the respective Federal and State ground drinking waters within the Aquifers beneath the town of Hinkley, California 92347.

C. CAUSE OF ACTION

COUNT I

The following civil rights has been violated: **Pursuant to 42 U.S.C. §1983**

As to Defendant John Izbicki: All allegations and facts as stated herein above Paragraph 2.

As to Defendant Patty Kouyoumdjian: All allegations and facts as stated herein above Paragraph 3.

As to Defendant Laury Kemper: All allegations and facts as stated herein above Paragraph 4.

As to Defendant Lisa Dernbach: All allegations and facts as stated herein above Paragraph 5.

As to Defendant Anne Holden: All allegations and facts as stated herein above Paragraph 6.

As to Defendant Ray Britain : All allegations and facts as stated herein above Paragraph 7.

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

COUNT II

The following civil rights has been violated: **Pursuant to 42 U.S.C. §1985(3)**

Conspiracies to deprive Plaintiffs of rights or privileges guaranteed by the Constitution to all citizens.

As to Defendant John Izbicki: All allegations and facts as stated herein above Paragraph 2.

As to Defendant Patty Kouyoumdjian: All allegations and facts as stated herein above Paragraph 3.

As to Defendant Laury Kemper: All allegations and facts as stated herein above Paragraph 4.

As to Defendant Lisa Dernbach: All allegations and facts as stated herein above Paragraph 5.

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As to Defendant Anne Holden: All allegations and facts as stated herein above Paragraph 6.

As to Defendant Ray Britain : All allegations and facts as stated herein above Paragraph 7.

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

COUNT III

The following civil rights has been violated: **Pursuant to 42 U.S.C. §1986** Failure to prevent conspiracies to deprive Plaintiffs of rights or privileges guaranteed by the Constitution to all citizens.

As to Defendant John Izbicki: All allegations and facts as stated herein above Paragraph 2.

As to Defendant Patty Kouyoumdjian: All allegations and facts as stated herein above Paragraph 3.

As to Defendant Laury Kemper: All allegations and facts as stated herein above Paragraph 4.

As to Defendant Lisa Dernbach: All allegations and facts as stated herein above Paragraph 5.

As to Defendant Anne Holden: All allegations and facts as stated herein above Paragraph 6.

As to Defendant Ray Britain : All allegations and facts as stated herein above Paragraph 7.

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

D. PREVIOUS LAWSUITS AND ADMINISTRATIVE RELIEF

1) Have you filed other actions in state or federal courts involving the **same or similar facts** as involved in this action? ___Yes __X__No. If your answer is "Yes", describe each lawsuit. (If more than one, describe the others on an additional page following the below outline).

a) Defendants:_____

b) Name of court and docket number:_____

c) Disposition (for example, was the case dismissed , appealed or is it still pending?):

d) Issues raised:_____

e) Approximate date it was filed:_____

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f) Approximate date of disposition:_____

2) Have you filed an action in federal court that was **dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?**

____Yes ___X___ No. If your answer is "Yes", describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page following the below outline.)
Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

a) **Defendants:**_____

b) Name of court and case number: _____

c) The case was dismissed because it was found to be (check one): _____frivolous _____malicious or _____failed to state a claim upon which relief could be granted.

d) Issues raised:_____

e) Approximate date it was filed:_____

f) Approximate date of disposition:_____

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

a) Defendants:_____

b) Name of court and case number: ._____

c) The case was dismissed because it was found to be (check one):_____frivolous

d) _____malicious or _____failed to state a claim upon which relief could be granted.

e) Issues **raised:**_____

f) Approximate date it was filed:_____

g) Approximate date of disposition:_____

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

a) Defendants:._____

b) Name of court and case number: _____.

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c) The case was dismissed because it was found to be (check one): _____frivolous

d) _____malicious or _____failed to state a claim upon which relief could be granted.

e) Issues raised:_____

f) Approximate date it was filed:_____

g) Approximate date of disposition:_____

2) Have you attempted to resolve the dispute stated in this action by seeking relief from the proper administrative officials, e.g., have you exhausted available administrative grievance procedures? ___X__Yes ____No. If your answer is "No", did you not attempt administrative relief because the dispute involved the validity of a: (1)_____ disciplinary hearing; (2)_____ state or federal court decision; (3) _____state or federal law or regulation; (4) _____parole board decision; or (5) ___X_ other . If your answer is "Yes", provide the following information.

Grievance Number_____ .
Date and institution where grievance was filed: From June 19, 2015 to February 15, 2016
Response to grievance: All local, State and Federal Government's staff were non responsive.

E. REQUEST FOR RELIEF

I believe that we are entitled to the following relief:

1.) Order by this Court, based upon Jury's conclusion, based upon evidence, that Defendants must finally concede to the fact that the ground drinking water within the Hinkley's aquifers are poisoned with Arsenic and Uranium, over the legal limits.

2.) Order by this Court, based upon Jury's conclusion, based upon evidence, that Defendants finally concede that the ground drinking water within the Hinkley's aquifers is not safe to drink.

3.) Order by this Court, based upon Jury's conclusion, based upon evidence, that ground drinking

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water within the aquifer beneath the Plaintiffs' residence in Hinkley, CA 92347 is poisoned with Arsenic over the legal limit.

4.) Order by this Court, based upon Jury's conclusion, based upon evidence, that the ground drinking water within the aquifer beneath the Plaintiffs' residence in Hinkley, CA 92347 is not safe to drink.

5.) Injunctive Relief, restraining the Defendants to further promulgate that the ground drinking water within the Hinkley's aquifers is safe to drink, and to restrain the Defendants from further receive any money from Pacific Gas and Electric Company (PG&E), other than fines and penalties for wrongful acts, such as further poisoning the ground drinking water within the Hinkley's aquifers, construed as the Federal and State waters, as well as beneficial use water reserved to the citizens from this great democratic country. This Complaint must be treated as a separate and distinct from any other complaints, that may be filed in this Court against Pacific Gas and Electric Company (PG&E) and the respective request for relief.

I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

(Name of Person who prepared or helped prepare this complaint if not Plaintiff)

Ex. 6 - Personal Privacy

February 15, 2016
(Date)

(Additional space if needed; identify what is being continued)

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