

**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN FRANCISCO**

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**COMPLAINT**

P. SCOTT VS. CRAIGLIST, INC. et al

001C02778451

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF SAN FRANCISCO**

10 SCOTT P.,<sup>1</sup>

11 Plaintiff,

12 v.

13 CRAIGSLIST, INC., FOSTER DAIRY FARMS,  
14 FOSTER POULTRY FARMS, MICHAEL O. SIMPSON,  
15 ALBERT CARRENO, and DOES 1 through 100,  
16 inclusive,

16 Defendants.

CASE NO.: CGC-10-496687  
Hon. Arlene T. Borick  
Department 212

**FIRST AMENDED COMPLAINT FOR  
COMPENSATORY AND PUNITIVE  
DAMAGES AND INJUNCTIVE RELIEF:**

1. **BREACH OF CONTRACT-  
PROMISSORY ESTOPPEL;**
2. **UNFAIR COMPETITION - BUS.  
& PROF. CODE § 17200;**
3. **DISCRIMINATION IN EMPLOYMENT-  
HARASSMENT, SEXUAL  
HARASSMENT, HOSTILE WORK  
ENVIRONMENT;**
4. **NEGLIGENT HIRING, RETENTION  
AND SUPERVISION;**
5. **INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS**
6. **RETALIATION**

24 <sup>1</sup> Due to the nature of the allegations contained herein, the Plaintiff, as the victim of harassment  
25 and invasion of privacy and as a victim of crimes prosecuted by his local District Attorney's office, is  
26 identified herein using only his first name and last initial in order to preserve his confidentiality and  
27 privacy and to avoid any further invasion of privacy. See, Wel. & Inst. Code § 827; *T.N.G. v. Superior  
28 Court* (1971) 4 Cal.3d 767; *People v. Ramirez* (1997) 55 Cal.App.4th 47; See also, *M.G. v. Time Warner*,  
(2001) 89 Cal. App. 4<sup>th</sup> 623 (Court of Appeal approved use of initials during litigation and in Court's own  
opinion to avoid exposing invasion of privacy plaintiffs to further notoriety.)

7. **INVASION OF PRIVACY-FALSE LIGHT**
  8. **INVASION OF PRIVACY-INTRUSION**
  9. **INVASION OF PRIVACY-PUBLIC DISCLOSURE OF PRIVATE FACTS**
  10. **INVASION OF PRIVACY-MISAPPROPRIATION OF NAME**
  11. **NUISANCE**
  12. **DISABILITY DISCRIMINATION**
  13. **CONSTRUCTIVE DISCHARGE**
  14. **DEFAMATION**
- JURY TRIAL DEMANDED**

COMES NOW PLAINTIFF, SCOTT P. (hereinafter "Plaintiff"), who complains and alleges against Defendant, CRAIGSLIST, INC. (hereinafter "CRAIGSLIST"), and DOES 1 through 50, inclusive, Defendant FOSTER DAIRY FARMS and Defendant FOSTER POULTRY FARMS (hereinafter collectively "FOSTER FARMS"), Defendant MICHAEL O. SIMPSON (hereinafter "SIMPSON"), Defendant ALBERT CARRENO (hereinafter "CARRENO") and DOES 51 through 100, inclusive, based on information and belief, the following:

**GENERAL ALLEGATIONS**

**A. INTRODUCTION**

1. Plaintiff SCOTT P. was an employee in good standing at FOSTER FARMS from August of 2001, when he began his employment in the sales division, until his resignation in or about February 22, 2009. At all relevant times at issue herein Plaintiff was a married heterosexual man and the father of two children.
2. Defendant FOSTER FARMS is one of the largest commercial dairies in California and in the Western United States. It processes and sells millions of gallons of milk each week. It also produces and sells a wide variety of cultured dairy products such as yogurt, ice cream, butter, cottage cheese, as well as fruit juice and more. At all relevant times at issue herein Defendant FOSTER FARMS

1 employed Plaintiff SCOTT P. As Plaintiff's employer, Defendant FOSTER FARM obtained access to  
2 Plaintiff's confidential personal information including his marital status and children, his wife's  
3 occupation running a preschool/day care center out of their home, his home address and his private  
4 home telephone number. Moreover, Defendant FOSTER FARMS furnished Plaintiff with a cell phone  
5 and as such knew the number to that device.

6 3. Defendant SIMPSON was, at all relevant times at issue herein, a management level employee of  
7 Defendant FOSTER FARMS acting within the course and scope of his employment, and Plaintiff's  
8 supervisor. At all relevant times at issue herein, Defendant FOSTER FARMS knew that Defendant  
9 SIMPSON had a history of harassing other employees of Defendant FOSTER FARMS.

10 4. Defendant CARRENO was, at all relevant times at issue herein, a management level employee  
11 of Defendant FOSTER FARMS acting within the course and scope of his employment, and Plaintiff's  
12 supervisor. At all relevant times at issue herein, Defendant CARRENO knew that Defendant  
13 SIMPSON had a history of harassing FOSTER FARMS employees including but not limited to Plaintiff  
14 as described herein.

15 5. During his employment with Defendant FOSTER FARMS, Plaintiff SCOTT P. was wrongly  
16 denied a fair bid on a new, more lucrative sales route. Upon discovering that Defendant FOSTER  
17 FARMS was improperly providing non-union workers with higher-paying positions over union workers  
18 such as Plaintiff, Plaintiff complained. As a manager and supervisor for Defendant FOSTER FARMS,  
19 Defendant CARRENO and Defendant SIMPSON knew of Plaintiff's complaint. Thereafter, Plaintiff  
20 was demoted to a delivery driver at a reduced hourly pay rate. After Plaintiff complained, he was  
21 regularly and repeatedly harassed by other managing and supervisory employees of Defendant FOSTER  
22 FARMS including Defendants CARRENO and SIMPSON and other supervisory and management level  
23 personnel including but not limited to the highest ranking officials in the company, all acting within the  
24 course and scope of their employment. Moreover, after Plaintiff filed a claim over stress from his  
25 harassment at work and a hand injury suffered on the job, Plaintiff was subjected to additional and  
26 increased harassment and retaliation on the job.

27 6. Numerous supervisory employees of Defendant FOSTER FARMS and its agents and employees  
28

1 acting within the course and scope of their agency and employment repeatedly and continuously  
2 harassed Plaintiff in the work place through rude and offensive remarks and gestures, making the  
3 conditions of the work place intolerable for Plaintiff. Defendant SIMPSON was among the most  
4 aggressive and vociferous of Plaintiff's harassers at work, repeatedly and continuously harassing and  
5 threatening Plaintiff through abusive, disparaging and offensive remarks, behavior and gestures around  
6 the workplace.

7 7. Defendant FOSTER FARMS knew of the harassment of Plaintiff and encouraged its employees  
8 and agents, in the course and scope of their employment and agency, to harass Plaintiff and make his  
9 working conditions and his continued employment with Defendant intolerable, in a concerted effort to  
10 force Plaintiff to quit. Moreover, Defendant FOSTER FARMS, through its high-ranking supervisory  
11 and management level executives, directed and encouraged Defendant SIMPSON, a manager and  
12 Plaintiff's supervisor, to harass Plaintiff, as part of Defendant SIMPSON's job responsibilities.

13 8. In addition to harassing Plaintiff on the job, Defendants decided to expand their campaign of  
14 harassment against Plaintiff in a manner they knew would cause significant harm to both Plaintiff and  
15 his family. While continuing to harass Plaintiff on the job, Defendants, and each of them, began a  
16 pattern of harassing Plaintiff at home with an even more damaging method of harassment, defamation,  
17 nuisance and assault waged through the internet while hiding their true identity. Specifically, Defendant  
18 FOSTER FARMS, through its agents and supervisors including but not limited to Defendants  
19 CARRENO and SIMPSON, found a highly effective tool through which to harass Plaintiff on the  
20 internet in Defendant CRAIGSLIST.

21 9. In mid March 2009, Plaintiff began receiving phone calls at his home from men wanting gay sex.  
22 Plaintiff, a heterosexual, was married with two children. Many of the men who called made  
23 sexually graphic and offensive statements to the Plaintiff and his family. Later people started calling  
24 the Plaintiff wanting to buy a vintage automobile Plaintiff did not own. Then dozens of people showed  
25 up at Plaintiff's home wanting to take free furniture and other valuable property. All of the unwanted  
26 calls and people were responding to ads placed on Craigslist by someone posing as the Plaintiff. After  
27 investigating the incidents the police ultimately traced the posts to Plaintiff's work supervisor Defendant  
28 SIMPSON, a management-level employee of Defendant FOSTER FARMS.

1 10. Defendant CRAIGSLIST facilitates harassment and illicit activity over the internet by allowing  
2 individuals to anonymously access the site with no restrictions, safeguards or security of any kind to  
3 accurately identify posters or assure that they are in fact who they purport to be in their posts.  
4 Indeed, it is well-known to Defendant CRAIGSLIST that hundreds of people are harassed every month  
5 through postings on the craigslist.org website. Moreover, Defendant CRAIGSLIST is well aware that  
6 its lack of user-identification procedures of any kind results in the site regularly being used for  
7 impersonation, prostitution, child pornography, and a host of other illegal and salacious activities.

8 11. Defendant CRAIGSLIST is the internet's destination of choice for harassers, impersonators,  
9 prostitutes, panderers, child traffickers, and others seeking to engage in criminal or otherwise illicit  
10 behavior with virtual impunity. In order to attract more users and gain an unfair advantage over its  
11 competitors Defendant CRAIGSLIST does not implement the user-authentication, screening and  
12 identification procedures utilized by other competing internet service providers.

13 12. Consequently, Defendant SIMPSON was able to easily access Defendant CRAIGSLIST and  
14 impersonate the Plaintiff for the purpose of harassing him. In fact, Defendant SIMPSON repeatedly  
15 utilized Defendant CRAIGSLIST to impersonate the Plaintiff and post several fraudulent, harassing and  
16 harmful ads about him on the website.

17 13. Defendant CRAIGSLIST allowed Defendants FOSTER FARMS and its agents, managers and  
18 supervisors including but not limited to SIMPSON to use the internet website as a weapon,  
19 impersonating and maliciously attacking the Plaintiff with effortless anonymity and impunity. This  
20 lawsuit aims to stop the *anonymous* internet attacks and *impersonations* that have become commonplace  
21 on Craigslist by implementing accountability in the way Craigslist does business consistent with Federal  
22 and State criminal laws prohibiting identity theft and impersonation, compelling Craigslist to require  
23 users to *accurately identify themselves* before they are allowed to post ads on the website.

24 14. All allegations in this Complaint are based on information and belief except for those allegations  
25 which pertain to the Plaintiff named herein. Plaintiff's information and belief are based upon, *inter*  
26 *alia*, the investigation conducted to date by Plaintiff and his counsel. Each allegation in this Complaint  
27 either has, or is likely to have, evidentiary support upon further investigation and discovery.

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1 **GENERAL ALLEGATIONS**

2 **The Parties**

3 15. Plaintiff SCOTT P. is and was at all relevant times mentioned herein an individual  
4 residing in Kern County, California.

5 16. Plaintiff is informed and believes that the relevant events in this case occurred concurrently  
6 within the Counties of San Francisco and Kern, in the State of California from March 2009 through  
7 April 2009, with regard to CRAIGSLIST; and in the County of Kern, State of California from about  
8 sometime in 2004 up through and including 2009, with regard to FOSTER FARMS and SIMPSON.

9 17. Plaintiff is informed and believes, and thereon alleges that Defendant CRAIGSLIST,  
10 and DOES 1 through 50, and each of them are, and at all relevant times were, a corporation, division,  
11 subsidiary, parent corporation, successor, predecessor, partnership, joint venture, sole proprietorship,  
12 unincorporated association, society or business entity unknown, licensed to do, doing business in, and  
13 existing under the laws of the State of California, in the County of San Francisco.

14 18. Plaintiff is informed and believes, and thereon alleges that Defendants FOSTER DAIRY  
15 FARMS and FOSTER POULTRY FARMS (hereinafter collectively "FOSTER FARMS"), and DOES  
16 51 through 100, and each of them are, and at all relevant times at issue herein were, a corporation,  
17 division, subsidiary, parent corporation, successor, predecessor, partnership, joint venture, sole  
18 proprietorship, unincorporated association, society or business entity unknown, licensed to do, doing  
19 business in, and existing under the laws of the State of California. The Plaintiff, and all the FOSTER  
20 FARMS Defendants alleged to have taken part in the wrongful acts and occurrences at issue herein,  
21 worked primarily at the Defendants' premises located at 6401 Knudsen, Bakersfield, California 93308.  
22 In addition, Plaintiff's employment has required him to travel to various counties and areas throughout  
23 California, covering ten to twenty five locations throughout California at any given time through the  
24 course of his daily driving delivery route.

25 19. Plaintiff is informed and believes, and thereon alleges that Defendant ALBERT CARRENO is,  
26 and at all relevant times mentioned herein, was an individual residing in the County of Kern, State of  
27 California, an employee, agent and a high-ranking manager of Defendant FOSTER FARMS,  
28 SIMPSON's supervisor, including but not limited to the definition under *Government Code* § 12926,

1 acting under the authority and control of Defendant FOSTER FARMS and within the scope of his  
2 employment and in furtherance of the business of Defendant FOSTER FARMS at all relevant times at  
3 issue herein. At all times relevant herein, Defendant CARRENO was a management level employee  
4 and/or agent of Defendant FOSTER FARMS.

5 20. Plaintiff is informed and believes, and thereon alleges that Defendant MICHAEL  
6 SIMPSON is, and at all relevant times mentioned herein, was an individual residing in the County of  
7 Kern, State of California, an employee, agent and a high-ranking manager of Defendant FOSTER  
8 FARMS and Plaintiff's direct supervisor, including but not limited to the definition under *Government*  
9 *Code* § 12926, acting under authority and control of Defendant FOSTER FARMS and within the scope  
10 of his employment and in furtherance of the business of Defendant FOSTER FARMS at all relevant  
11 times at issue herein. At all times relevant herein, Defendant SIMPSON was a management level  
12 employee and/or agent of Defendant FOSTER FARMS.

13 21. Plaintiff was at all relevant times mentioned herein, employed by Defendant FOSTER FARMS.

14 22. The true names and capacities, whether individual, corporate, associate or otherwise of  
15 defendants DOES 1 through 100, are unknown to Plaintiff, who therefore sues by such fictitious names.  
16 Plaintiff is informed and believes, and thereon alleges, that each of the defendants designated DOE is  
17 responsible in some manner for the harassment, negligence, intentional infliction of emotional distress,  
18 breach of contract, or in some other actionable manner, for the events and happenings hereinafter  
19 referred to, as well is tortiously responsible in some manner for legally causing the injuries and damages  
20 to the Plaintiff as hereinafter alleged. Plaintiff will seek leave of court to amend his complaint to insert  
21 the true names and/or capacities of such fictitiously named DOE defendants when ascertained.

22 23. Plaintiff is informed and believes, and thereon alleges, that each of the named defendants,  
23 whether specifically named or designated herein as a DOE, were/are the agents, servants, employees,  
24 principals, joint-venturers, co-conspirators, management companies and/or representatives of each of the  
25 remaining co-defendants, and in doing the wrongful acts alleged, were acting within the course and  
26 scope of their agency, employment, joint-venture, conspiracy, reinsurance agreement, co-insurance  
27 agreement, management company agreement and/or service, with the knowledge, approval, authority,  
28 acquiescence and/or ratification of each of the remaining defendants.



1 24. Plaintiff is informed and believes, and thereon alleges, that at all times mentioned herein,  
2 each of the defendants was the successors in interest to each of the remaining defendants, and on that  
3 basis is liable for any act or omission of said defendants herein alleged.

4 25. All of the acts and conduct of each and every defendant as described below were duly  
5 authorized, ordered and directed by the respective and collective defendant employers, and the officers  
6 and management-level employees of Defendant FOSTER FARMS. Moreover, at all relevant times  
7 alleged herein, Defendant SIMPSON was employed with Defendant FOSTER FARMS. In addition  
8 thereto, FOSTER FARMS participated in the aforementioned acts and conduct of FOSTER FARMS  
9 employees, agents and representatives including but not limited to SIMPSON; and upon completion of  
10 the aforementioned acts and conduct of the FOSTER FARMS employees, agents and representatives,  
11 respectively and collectively ratified, accepted the benefits of, condoned, lauded, acquiesced, authorized  
12 and otherwise approved of each and all of the wrongful acts and conduct of the aforementioned  
13 FOSTER FARMS employees, agents, and representatives, including but not limited to SIMPSON.

14 26. Plaintiff timely filed requests for right to sue letters with the Department of Fair Employment  
15 and Housing ("DFEH") with regard to his claims against the Defendants FOSTER FARMS and  
16 SIMPSON. Plaintiff has received DFEH right-to-sue letters authorizing the claims at issue in this  
17 lawsuit as against Defendants FOSTER FARMS and SIMPSON. Plaintiff timely files this complaint  
18 within one year of the date of the Right-to-Sue letters. (True and correct copies of Plaintiff's DFEH  
19 Right-to-Sue letters are collectively attached hereto as Exhibit 1 and incorporated herein by this  
20 reference.)

21 **Statement of Facts Common to all Causes of Action**

22 27. Plaintiff incorporates herein all previous paragraphs by this reference as though set forth  
23 in full herein.

24 **Foster Farms**

25 28. Plaintiff was initially hired at Defendant FOSTER FARMS in August 2001 in the sales division.  
26 Plaintiff continued his employment working in sales with Defendant FOSTER FARMS through 2009.

27 29. In 2004, Plaintiff properly requested a new sales route that Defendant FOSTER FARMS had  
28 acquired through its recent acquisition of another competitor, Knudsen Dairy. Upon being denied the

1 new sales route, Plaintiff voiced his concerns that Defendant FOSTER FARMS's assignment of the new  
2 sales route was unfair to Plaintiff and others. In retaliation for Plaintiff's complaints, Defendant  
3 FOSTER FARMS began a concerted campaign to harass and defame Plaintiff at work.

4 30. Defendants' harassment of Plaintiff included, without limitation, the following: supervisory and  
5 high ranking executives with Defendant FOSTER FARMS groundlessly ridiculed and reprimanded  
6 Plaintiff and warned Plaintiff that he "best be good;" Defendant FOSTER FARMS intentionally paid  
7 Plaintiff incorrectly and less than he was owed; Defendant FOSTER FARMS wrongfully denied  
8 Plaintiff vacation time; Defendant FOSTER FARMS demoted Plaintiff from sales to loading; Defendant  
9 FOSTER FARMS and its supervisory employees ridiculed and mocked Plaintiff's name; Plaintiff's  
10 vehicle was vandalized while parked on Defendant FOSTER FARMS's premises during working hours;  
11 Defendant FOSTER FARM's agents and supervisors acting within the course and scope of their agency  
12 and employment openly ridiculed and mocked Plaintiff's name; Defendant FOSTER FARMS, through  
13 its agents and supervisors, openly and mockingly referred to other employees as Plaintiff's "girlfriend."  
14 As a result of the continuing harassment from the Defendants, and each of them, Plaintiff began  
15 experiencing stress and submitted a claim for workplace stress. In retaliation for Plaintiff's stress and  
16 injury claim, Defendant FOSTER FARMS, through their high-level employees and managing agents  
17 including but not limited to Defendant SIMPSON, increased and eventually broadened their harassment  
18 and actionable misconduct toward the Plaintiff.

19 31. Thereafter, Plaintiff was subjected to increased and constant harassment by Defendant FOSTER  
20 FARMS and its employees and agents acting within the course and scope of their employment and  
21 agency including Defendants CARRENO and SIMPSON. Defendant FOSTER FARMS retaliated  
22 against Plaintiff by awarding more favorable work assignments and positions to other less senior  
23 employees over the Plaintiff. The harassment was so severe as to make Plaintiff's working conditions  
24 intolerable.

25 32. Defendant FOSTER FARMS relied most often on its high-ranking supervisory and  
26 management-level executives including Defendants CARRENO and SIMPSON to carry out much of the  
27 harassment of Plaintiff. Defendant CARRENO was a high-ranking manager for Defendant FOSTER  
28 FARMS and similarly Defendant SIMPSON was a high-ranking manager for Defendant FOSTER

1 FARMS and Plaintiff's supervisor and direct boss. Moreover, prior to the harassment of Plaintiff,  
2 Defendant FOSTER FARMS knew that Defendant SIMPSON had a long history of engaging in  
3 misconduct toward other employees including but not limited to harassing and defaming other  
4 employees, making him unfit to continue in his position without close supervision.

5 33. Defendant FOSTER FARMS ignored Defendant SIMPSON's history of misconduct toward  
6 other Foster Farms employees. Moreover, Defendant FOSTER FARMS encouraged Defendants  
7 CARRENO and SIMPSON to harass the Plaintiff. The campaign of harassment against the Plaintiff  
8 began almost immediately after Plaintiff made complaints to Defendant FOSTER FARMS about various  
9 conditions at work, as described hereinabove. Then, with the authorization and ratification of Defendant  
10 FOSTER FARMS, Defendants CARRENO and SIMPSON escalated the harassment of the Plaintiff. As  
11 a result of the harassment from the Defendants, Plaintiff began suffering from stress and emotional  
12 distress, causing Plaintiff to file a stress claim in May 2008.

13 34. Plaintiff continued to suffer serious workplace harassment from Defendant FOSTER FARMS,  
14 through its agents and supervisors, including Defendants CARRENO and SIMPSON, up through and  
15 including the time of the Craigslist postings. For example, as a driver/loader, Plaintiff was provided by  
16 Defendant FOSTER FARMS, through its agents and supervisors, with a credit card to be used to  
17 purchase diesel fuel for his delivery truck while on his Foster Farms delivery route. Initially, Defendant  
18 FOSTER FARMS, through its agents and supervisors, delivered a credit card to Plaintiff with the  
19 incorrect spelling of Plaintiff's name as "Scott **Poiston**" (emphasis added), rather than "Scott P-----."  
20 (A true and correct copy of the first fuel card is attached hereto as Exhibit 2 and incorporated herein by  
21 this reference.) Plaintiff pointed out the error to Defendant FOSTER FARMS supervisory personnel  
22 and requested a new card with the correct spelling of his last name. Plaintiff's request was met with  
23 laughter by Defendant FOSTER FARMS's supervisor. Weeks later Defendant FOSTER FARMS,  
24 through its supervisors and agents, including Defendant CERRANO, provided Plaintiff with a  
25 replacement fuel card. However, the second card once again contained the same harassing misspelling  
26 of Plaintiff's name as "Scott **Poiston**" (emphasis added), an obvious and intentional play on the word  
27 "Poison." (A true and correct copy of the second fuel card is attached hereto as Exhibit 3 and

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1 incorporated herein by this reference.) Plaintiff notified the Human Resources department at  
2 Defendant FOSTER FARMS, but his request was ignored, no action was taken and no assistance was  
3 provided.

4 35. Defendant FOSTER FARMS and Defendant CARRENO knew that Defendant SIMPSON had a  
5 long history of regularly using Craigslist. Thus, Defendant FOSTER FARMS, through its agents and  
6 supervisors including Defendants CARRENO and SIMPSON, initiated a plan to broaden the campaign  
7 of harassment against Plaintiff to include attacks over the internet. In order to harass Plaintiff with near  
8 impunity, and using private and confidential information about Plaintiff held and disclosed by Defendant  
9 FOSTER FARMS, Defendants FOSTER FARMS, through its agents and supervisors including  
10 Defendants CARRENO and SIMPSON elected to use CRIAGSLIST, a well-known internet company  
11 notorious for its anonymous use and absence of screening or identification safeguards of any kind.

#### 12 Craigslist

13 36. Defendant CRAIGSLIST began in 1995 and was incorporated as a private for-profit company in  
14 1999. It is currently the largest classified advertisement site in the world.

15 37. Defendant CRAIGSLIST provides online listings for jobs, personals and adult services (formerly  
16 labeled "erotic services"), among other things. As of 2009, Defendant CRAIGSLIST expanded to more  
17 than 700 local (city) sites in 70 countries. Defendant CRAIGSLIST serves over twenty (20) billion page  
18 views per month, placing it in 30<sup>th</sup> place overall among websites worldwide, and 8<sup>th</sup> place overall in the  
19 United States. Moreover, Defendant CRAIGSLIST is used by more than 50 million people in the  
20 United States alone. Defendant CRAIGSLIST receives over fifty (50) million new classified  
21 advertisements each month. As such, it is far and away the leading classifieds service in any medium,  
22 dwarfing its on-line competitors. Its classified advertisements range from traditional buy/sell ads and  
23 community announcements, to personal ads, solicitation for prostitution and adult services.

24 38. Defendant CRAIGSLIST has established its dominance in online classified advertising by  
25 eschewing the screening and identification procedures utilized by its competitors. Competing online  
26 classified advertising websites require users seeking to advertise online to first provide detailed personal  
27 information, such as their name, address, telephone number, and other personal data, for verification and  
28 tracking information before they can become members and begin posting ads on their sites. (See, e.g.,

1 true and correct copies of relevant pages of the account signup pages from competing websites such as  
2 Yahoo, eBay, Oodle, Garagesaletime, Commuto, and Redbeacon, attached hereto collectively as Exhibit  
3 4 and incorporated herein by this reference.) Defendant CRAIGSLIST, however, has become the  
4 number one online advertising site specifically by not requiring any identifying or screening information  
5 of any kind from its users.

6 39. In order to post an ad on Craigslist one is not required to provide any identifying information,  
7 credentials or even a name; only a working email address is needed. (A true and correct copy of the  
8 "account signup" page from Craigslist is attached hereto as Exhibit 5 and incorporated herein by this  
9 reference.) One seeking to post something, or anything, on CRAIGSLIST need only log onto  
10 Defendant's website, www.craigslist.org, enter an email address and select a password. At that point the  
11 user is free to post any classified ad for quite literally anything. (See examples of illicit postings and  
12 alleged criminal behavior on Craigslist set forth at ¶ 48 *infra*). Moreover, an email address is  
13 notoriously easy to acquire, providing no validation of identity or trust whatsoever. Specifically, for the  
14 Craigslist posts at issue herein Defendant SIMPSON was able to obtain and use an email address,  
15 sp-----@hotmail.com, which actually contained Plaintiff's first initial and last name. (The email  
16 obtained and used by Defendant SIMPSON contained the correct spelling of Plaintiff's entire last name,  
17 which has been removed here to avoid exposing the Plaintiff to further notoriety.) In fact, it is  
18 strikingly easy to post virtually anything on Defendant CRAIGSLIST's website.

19 40. As a privately held company, Defendant CRAIGSLIST does not formally disclose its financial  
20 information. However, upon information and belief, it is alleged that Defendant CRAIGSLIST's  
21 revenues are significant and ever increasing. In 2008 its revenue was approximately \$100 million. Its  
22 revenues were approximately \$55 million in 2007 and \$25 million in 2006.

23 41. As a result of its user-anonymity and complete lack of screening or identification procedures of  
24 any kind, Defendant CRAIGSLIST has gained an unfair competitive advantage over competing internet  
25 service providers, thereby becoming the dominant online classified ad posting site in the world.

26 42. Due to its complete absence of identification or screening procedures of any kind, Defendant  
27 CRAIGSLIST has become the internet destination of choice for individuals seeking to engage in

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1 harassing, offensive and illegal activities online ranging from child prostitution to murder, and  
2 everything in between.

3 **Craigslist's Content and Postings**

4 43. Defendant CRAIGSLIST's complete lack of identification or screening policies and practices of  
5 any kind have actually caused a veritable internet free-for-all where impersonating and harassing online  
6 posts regularly appear along with online ads regarding highly offensive, openly sexual and often  
7 criminal behavior.

8 44. Defendant CRAIGSLIST contains a variety of postings ranging from ads for the sale of furniture  
9 and apartment listings on the one hand, to illicit postings dedicated to casual sex, and even prostitution.  
10 Indeed, under the "services" area of its homepage, Craigslist includes an "adult" section where people  
11 openly promise sex for money. Put plainly, it is a page unabashedly dedicated to prostitution. (See,  
12 e.g. ¶ 48 "l.", *infra*.) (A true and correct copy of the webpage for adult service in Defendant  
13 Craigslist's Bakersfield page is attached hereto as Exhibit 6 and incorporated herein by this reference.)

14 45. Under the "personals" section of its homepage, Defendant Craigslist has a "casual encounters"  
15 page where people seek random sexual encounters with strangers. (True and correct copies of the  
16 webpages for the casual encounters section of Craigslist Bakersfield, San Francisco and Los Angeles  
17 from November 2009, are attached hereto collectively as Exhibit 7 and incorporated herein by this  
18 reference.)

19 46. The blatantly sexual content of the Defendant CRAIGSLIST's casual encounters page is an open  
20 invitation to wanton and aggressive sexual responses.

21 47. Defendant CRAIGSLIST uses abbreviations to reference its many categories of sexual  
22 encounters available. For example, "m" stands for man, "w" represents woman, and "4" means "for."  
23 Thus, "m4m" means man looking for a homosexual encounter with another man.

24 48. Due to its complete absence of sign-up screening or identification procedures of any kind,  
25 allowing its posters to conceal their actual identity, and the openly and aggressively sexual nature of its  
26 content, Defendant CRAIGSLIST has caused its site, much more than any competing website, to  
27 produce countless inappropriate, harassing and at times illicit postings resulting in criminal, deviant and  
28 actionable conduct. Indeed, in recent years a variety of allegedly illegal activities and doomed

1 encounters have been caused by Craigslist ads. Moreover, Craigslist is well aware that individuals  
2 regularly use the website to impersonate other people for the purpose of harassment. A sampling of  
3 recent untoward events involving Craigslist posts, including several instances of impersonation and  
4 harassment, follows:

- 5 a. On February 3, 2006, Craigslist was sued by the Chicago Lawyers' Committee for Civil  
6 Rights Under Law for allegedly allowing users to post discriminatory housing ads in Chicago  
7 that violate the Fair Housing Act.
- 8 b. On September 8, 2006, several sites reported that Craigslist's "Casual Encounters" forums in  
9 several cities had been allegedly compromised by individuals posting fraudulent ads in order  
10 to obtain personal information about people. This information, including email addresses,  
11 phone numbers, home addresses, photos, etc., was publicly posted online.
- 12 c. On September 12, 2007, a woman from Minneapolis, Minnesota pleaded guilty in federal  
13 court to running an underage prostitution ring through Craigslist.
- 14 d. On October 26, 2007, a Minneapolis woman was found murdered in the trunk of her car after  
15 she responded through Craigslist to what she thought was a job as a nanny; the ad had  
16 actually been placed by the reported "Craigslist Killer" Michael John Anderson. Anderson  
17 was reportedly convicted of his "Craigslist Killing" in 2009.
- 18 e. On February 8, 2008, a Michigan woman was charged with allegedly using Craigslist to hire  
19 a contract killer to murder a romantic rival in Oroville, California.
- 20 f. On March 22, 2008, a North Carolina man was arrested for the alleged murder of Bonnie Lou  
21 Irvine, 52, of Cornelius, North Carolina; she had allegedly agreed to meet him after he  
22 responded to her ad on Craigslist.
- 23 g. In April 2008, a Minneapolis couple was indicted for using Craigslist to advertise for sexual  
24 services, and then picking the pockets of those who responded. The couple then used stolen  
25 identification, checks and credit cards to purchase merchandise from online retailers as well  
26 as prescription drugs. In addition the couple was responsible for tens of thousands of dollars  
27 of bank fraud throughout the Twin Cities area. The couple ultimately pleaded guilty to  
28 trafficking in stolen documents and aggravated identity theft; and was sentenced to serve  
time in Federal Prison.
- h. In April 2008, a couple was charged with placing an ad on Craigslist inviting the public to  
take anything from a man's home in Oregon, leading to the loss of his possessions. The  
couple had placed this ad to cover up their own burglary of his house.
- i. On May 27, 2008, in Vancouver, British Columbia, police reported that a Vancouver couple  
had attempted to sell its week-old baby on the site, but the couple claimed that it was merely  
a joke. The investigation is ongoing.
- j. It was reported that on November 7, 2008, after reaching an accord with over forty of the  
United States' top prosecutors, Craigslist announced that it would crack down on ads for  
prostitution by requiring people who post "erotic services" ads to provide a working phone  
number and pay a fee with a valid credit card. (Though Defendant Craigslist obviously has  
the ability to control and track its users, no such restrictions have been implemented for those  
making other posts.)
- k. On December 7, 2008, a man was fatally shot after robbing, assaulting and attempting to  
murder another man in Arlington, Virginia whom he had met through Craigslist; in January,  
2009, the man accused of the murder was indicted for the murder but was subsequently  
acquitted.

- 1 l. On March 5, 2009, the Cook County, Illinois Sheriff's Department filed a lawsuit against  
2 Craigslist, accusing the site of "knowingly promoting and facilitating prostitution" in its  
3 "erotic services" advertisement section.
- 4 m. On March 20, 2009, the ABC radio news reporter George Weber was allegedly murdered by  
5 John Katehis in Brooklyn. The two had allegedly met via Craigslist; Weber was found bound  
6 and stabbed fifty times.
- 7 n. On April 20, 2009, a man and his mother were attacked in Tacoma, WA with a hammer after  
8 seeing a bogus car ad on Craigslist. This was reported in the national news.
- 9 o. On April 20, 2009, Boston police arrested twenty-three-year-old Boston University medical  
10 student Philip Markoff of Quincy, Massachusetts, on suspicion of two cases of assault and  
11 robbery, and one was the murder of a woman whose services were advertised on Craigslist in  
12 Boston and Rhode Island, and whose corpse was found on April 14 in a Boston hotel.  
13 Allegedly Markoff first bludgeoned and then shot her with a gun, and, according to  
14 additional charges filed not long after, then allegedly robbed a stripper at a Warwick Holiday  
15 Inn two days later. He was arrested the following week and has pleaded not guilty.
- 16 p. Subsequent to the Markoff matter, state attorneys general countrywide applied increased  
17 pressure on the site to "to shutter what they call the nation's busiest virtual street corner,  
18 where prostitution runs rampant." Although Craigslist claims to have reduced inappropriate  
19 erotic listings by 95 per cent since its accord with prosecutors in November 2008, the  
20 attorneys general hold that there are still hundreds of such listings emerging every day, and  
21 that the company really ought to do more. South Carolina Attorney Gen. Henry McMaster  
22 reportedly threatened the company with criminal proceedings, but it swiftly employed the  
23 same defense that had used previously.
- 24 q. In June 2009 Korena Roberts of Oregon was arrested for allegedly killing 21-year-old  
25 Heather Snively -- who was eight-months pregnant -- and her unborn baby, by cutting open  
26 her abdomen. They were reported to have met through an alleged advertisement by Roberts  
27 on Craigslist for the sale of baby clothes.
- 28 r. In June 2009 Joseph Brooks, a 71 year old film director and songwriter was reportedly  
arrested on 11 counts of alleged rape, including 9 counts of allegedly raping women aged 18  
to 30 whom he allegedly met through advertisements offering film roles on Craigslist.
- s. In August 2009, members of Pranknet, a virtual community allegedly established around  
harassing people via the internet were reported for allegedly posting fraudulent ads on  
Craigslist and then shouting racist, sexually graphic and obscene tirades at people who called  
to inquire about their ads. Pranknet members also allegedly responded to ads placed by  
young women selling household goods, feigned interest in making a purchase, and when they  
learned the woman's address, allegedly proclaimed they were on their way over to rape them  
and murder their children.
- t. On January 4, 2010, the *New York Post* reported that after being threatened with a lawsuit  
Craigslist pulled an ad for the sale of a wedding video depicting "lost" footage of deceased  
actress Brittany Murphy that had been posted on its website. Craigslist was also reportedly  
asked to hand over details of the individual who posted the private video for sale on  
Craigslist.
- u. On January 11, 2010, the *Los Angeles Times* reported that a Marine stationed at California's  
Twenty-nine Palms allegedly used Craigslist to impersonate his former girlfriend living in  
Wyoming and successfully solicit her alleged assault and rape there.

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1 49. In addition to the numerous incidents of criminal misconduct, on information and belief it is  
2 estimated that Defendant CRAIGSLIST is aware of *hundreds* of additional separate incidents of  
3 harassment carried out each month through inappropriate postings on its website. People select  
4 Craigslist to post their illicit internet messages because the website is completely lacking in user-  
5 screening or identification procedures. Indeed, the website is designed in such a manner as to actually  
6 enable people to impersonate others online and harass them, which is precisely what happened in this  
7 case.

8 **The Craigslist Postings Targeting the Plaintiff**

9 50. Defendant CRAIGSLIST maintains a specific webpage for Bakersfield and its surrounding areas  
10 in the County of Kern, located at [bakersfield.craigslist.org](http://bakersfield.craigslist.org).

11 51. Given its simplicity and complete and utter lack of user-screening or identification requirements  
12 of any kind, Defendant FOSTER FARMS, through its agents and supervisors including but not limited  
13 to Defendants CARRENO and SIMPSON, was allowed to enter the Craigslist website without having  
14 to provide accurate identification in any way and, once on the site, successfully pose as the Plaintiff, and  
15 post a series of internet ads on Craigslist claiming to be the Plaintiff SCOTT P. Thus, due to its  
16 complete and utter lack of user-screening or identification requirements of any kind, Defendant  
17 CRAIGSLIST allowed the Defendants to impersonate the Plaintiff on the Craigslist website and post  
18 harassing, fraudulent and harmful internet ads specifically targeting the Plaintiff.

19 52. As Plaintiff's employer and supervisor, Defendants FOSTER FARMS, CARRENO and  
20 SIMPSON had access to Plaintiff's personal information including his name, home address, marital  
21 status and the names and ages of his children, and his home and cell phone numbers. Defendants  
22 FOSTER FARMS, CARRENO and SIMPSON also knew that Plaintiff's spouse provided pre-  
23 school/day care service to other children out of the home she shared with the Plaintiff. Defendants  
24 FOSTER FARMS, CARRENO and SIMPSON, using personal information about the Plaintiff gained  
25 through confidential employment records, entered Defendant CRAIGSLIST's website and, posing as  
26 Scott P., the Plaintiff herein, began posting a series of personal ads on the "casual encounters" page with  
27 the intent of harassing Plaintiff and causing Plaintiff severe and permanent emotional distress and harm,  
28 and disturbing Plaintiff and interfering with his use and enjoyment of his home, among other things.

1 53. The fraudulent and harassing postings were specifically designed to cause Plaintiff as much  
2 distress, harm and damage in his home and to his family as possible. The first of such  
3 postings was intended to portray Plaintiff as a recently divorced, closeted homosexual looking for  
4 casual sex with complete strangers, as follows:

5 March 16, 2009, 10:19 p.m.: Defendant SIMPSON posts on Defendant CRAIGSLIST  
6 **“seeking a hot stud for first timer – m4m – 30 (n.w Bakersfield)**  
7 *recently divorced from my wife, have come to terms with my homo sexuality, and need*  
8 *someone to teach me the right way, and be gentle at the same time, age, race not*  
9 *important, must be disease and drug free, my place or yours. scott six six one ---- -----*  
10 *-----”*( The full text of Plaintiff’s home number is omitted here to protect Plaintiff  
11 from further notoriety.)

12 The text was accompanied by a pornographic photograph of male genitalia.

13 (A true and correct copy of the post is attached hereto as Exhibit 8 and incorporated  
14 herein by this reference.)

15 54. Defendants FOSTER FARMS and SIMPSON only had access to Plaintiff’s home telephone  
16 number through reviewing Plaintiff’s confidential and private employment records. After 10:19 p.m.  
17 on the evening of March 16, 2009, and continuing throughout the day and evening of March 17, 2009,  
18 Plaintiff received numerous sexually harassing phone calls from male callers seeking sexual encounters  
19 with the Plaintiff. The callers asked for sex and made highly offensive and graphic sexual comments  
20 and invitations to the Plaintiff. Members of Plaintiff’s family heard several of the sexually explicit  
21 statements made by callers. Plaintiff had no idea at the time why he was suddenly receiving such  
22 sexually graphic and offensive calls from men. After receiving numerous sexually explicit phone calls  
23 to his home from men seeking homosexual encounters, Plaintiff was informed that the cause of the calls  
24 was a sexually explicit homosexual posting in Plaintiff’s name on Craigslist which included his private  
25 home telephone number. (See Exhibit 8 attached hereto and incorporated herein by this reference.)

26 55. Plaintiff then searched Craigslist, and eventually located the posting, which was made  
27 particularly difficult because Plaintiff’s home telephone number had been spelled out in the post rather  
28 ///

1 than listed numerically. Plaintiff utilized the "flag" option to identify the post as fraudulent or false  
2 information.<sup>2</sup>

3 56. On the morning of March 18, 2009, Plaintiff telephoned the headquarters of Defendant  
4 CRAIGSLIST directly and informed them that someone had maliciously and for the purpose of  
5 harassment posted an ad on Craigslist fraudulently posing as him, and inviting men to call him for casual  
6 gay sexual encounters.<sup>3</sup> (A true and correct copy of Plaintiff's phone bill is attached hereto as Exhibit 9  
7 and incorporated herein by this reference.) Plaintiff requested that the posting be immediately removed  
8 from the website and Defendant CRAIGSLIST agreed to do so. Plaintiff further informed Defendant  
9 CRAIGSLIST that he and his wife operated a preschool/day care center for very young children out of his  
10 home and the calls that he received as a result of the fraudulent Craigslist posting were extremely  
11 disturbing and potentially dangerous given the presence of children at his home. Plaintiff verbally  
12 requested that no further postings identifying him by name, numbers or address be allowed to post on  
13 Craigslist without his express consent. Defendant CRIAGSLIST then promised Plaintiff that they  
14 would "take care of it."

15 57. Plaintiff requested that Defendant CRAIGSLIST provide him with the information about the  
16 poster of the fraudulent ad. Plaintiff then sent an email on March 18, 2009, at about 9:57 a.m.  
17 requesting that the Defendant CRAIGSLIST provide the information on the poster of the fraudulent ad  
18 about Plaintiff. (A true and correct copy of the email is attached hereto as Exhibit 10 and incorporated  
19 herein by this reference.) Defendant CRAIGSLIST responded with its own email acknowledging that  
20 the post was "an attempt to impersonate (the plaintiff) for the purpose of harassment." Defendant  
21 CRAIGSLIST then provided Plaintiff with all "details" they had on the poster, which included a Posting  
22 ID, an IP address and the poster's email address, which contained Plaintiff's first name initial and  
23 correct last name, "sp-----@hotmail.com," demonstrating the ease with which email addresses, even  
24

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25 <sup>2</sup> Defendant CRAIGSLIST allows users on its website, [www.craigslist.org](http://www.craigslist.org), to "flag" any posting that is  
26 deemed to be improper, offensive, harassing, fraudulent, etc., by clicking one of four categories: 1.)  
27 Miscategorized; 2.) Prohibited; 3.) Spam/overpost; and 4.) Best of craigslist.

28 <sup>3</sup> Pursuant to California Evidence Code § 452, Plaintiff hereby requests judicial notice be taken of the fact  
that the number (415) 566-6394 identified on Plaintiff's phone bills attached hereto as Exhibits 9, 13 and 24 and  
incorporated herein by this reference is in fact the telephone number to Craigslist Headquarters.

1 ones using the names of others, may be obtained. However, Defendant CRAIGSLIST acknowledged  
2 to the Plaintiff that they did not “have the poster’s name, phone number, or address.” Plaintiff  
3 informed Defendant CRAIGSLIST that the poster’s email using the Plaintiff’s name was not his, and  
4 was obviously being used to impersonate him for the purpose of harassing him over the internet.

5 58. Had Defendant CRAIGSLIST implemented the same sort of screening and identification  
6 procedures used by virtually every other competing websites (See, e.g., Exhibit 4 attached hereto), they  
7 would have obtained the name, number and address of Defendant SIMPSON at the time he first made  
8 the postings and, at the very least, would have been able to immediately identify him to the Plaintiff on  
9 March 18, 2009, thus preventing any further harassing postings directed at the Plaintiff. However,  
10 because of Defendant CRAIGSLIST’s unfair business practices, they had collected no such identifying  
11 information from Defendant SIMPSON when he registered to post the ads in question, thus leaving him  
12 free to continue his criminal and damaging impersonation and harassment of the Plaintiff, which he did.

13 59. On March 18, 2009, at about 10:08 p.m. Defendant SIMPSON, again posing as the Plaintiff and  
14 using the same email address, posted another harassing ad targeting the Plaintiff as a homosexual male  
15 seeking casual sex with men on Defendant CRAIGSLIST’s casual encounters page, as follows:

16 **“a hard man is good to find! – m4m**

17 *seeking a man between 21-48 for fun and good time!. Must be in decent shape, no drama,*  
18 *diseases. You will not be disappointed! Hope to hook up soon!!! six six one three three*  
19 *three six two seven zero.....”*

20 (A true and correct copy of the post is attached hereto as Exhibit 11 and incorporated  
21 herein by this reference.)

22 60. The second post included the number to Plaintiff’s cell phone, which was a cell phone that had  
23 been provided to the Plaintiff by the Defendant FOSTER FARMS. (The number has since been  
24 disconnected.) After the second posting, Plaintiff received further harassing and sexually explicit phone  
25 calls, this time to his cell phone number, which was only known by Defendants FOSTER FARMS and  
26 SIMPSON through their access to Plaintiff’s confidential and private employment records.

27 61. Early on the morning of March 20, 2009, Plaintiff attempted to telephone Defendant  
28 CRAIGSLIST about the additional sexually explicit homosexual ad put on Craigslist. Plaintiff then

1 emailed Defendant CRAIGSLIST again and requested that the post be immediately removed. Plaintiff  
2 further asked that Defendant CRAIGSLIST not allow any further posts with his name or number to be  
3 placed on Craigslist. (A true and correct copy of the email request is attached hereto as Exhibit 12 and  
4 incorporated herein by this reference)

5 62. Still concerned about further harassing posts being placed on Craigslist by the same individual  
6 whose identity was unknown to Plaintiff at the time, later on March 20, 2009, Plaintiff made another  
7 telephone call to Defendant CRAIGSLIST. (True and correct copies of relevant pages of the phone bill  
8 are attached hereto as Exhibit 13 and incorporated herein by this reference.) During the phone call  
9 Plaintiff informed Defendant CRAIGSLIST that the email address *previously identified by Craigslist* (a  
10 true and correct copy of the email from Craigslist is attached hereto as Exhibit 14 and incorporated  
11 herein by this reference) as belonging to the harassing poster, sp-----@hotmail.com, did not belong to  
12 him. Plaintiff further explained the serious distress and harm that he and his family were suffering as a  
13 result of the Craigslist posts and the harassing, sexually explicit calls they caused. Plaintiff urgently  
14 requested that Defendant CRAIGSLIST not allow any further posts about him using the same email,  
15 from the same computer, and identifying his name, telephone numbers or address in any way.

16 63. Defendant CRAIGSLIST promised Plaintiff that they would remove the posts, and take steps to  
17 stop the harassing Craigslist posts and "take care of it." On March 21, 2009, Plaintiff made yet another  
18 phone call to Defendant CRAIGSLIST (true and correct copies of relevant pages of his phone bill are  
19 attached hereto as Exhibit 15 and incorporated herein by this reference) to confirm that the two posts  
20 had been removed, and that Defendant would not allow any further posts about him, particularly from  
21 the same fraudulent email sp-----@hotmail.com. Although abrupt, Defendant CRAIGSLIST again  
22 promised Plaintiff that they had removed the posts, and had taken steps to prevent more posts from the  
23 same harassing source and that they would "take care of it." Plaintiff continued to reasonably rely on  
24 Defendant CRAIGSLIST's promises and on that basis took no other action himself to attempt to stop  
25 further harassing Craigslist posts.

26 64. Plaintiff reasonably relied on Defendant CRAIGSLIST's promise to remove the posts and  
27 prevent other Craigslist posts about him from the same source. Nonetheless, on or about April 18, 2009,  
28 people starting calling the Plaintiff wanting to buy a vintage automobile Plaintiff did not own. Then

1 dozens of people showed up at Plaintiff's home without warning, wanting to take free furniture and  
2 other valuable property. The unwanted calls and people were responding to additional ads placed on  
3 Craigslist. Indeed, despite Defendant CRAIGSLIST's promises to the Plaintiff to not allow any  
4 additional postings about him, on or about April 18<sup>th</sup> Defendant CRAIGSLIST allowed Defendant  
5 SIMPSON to post ads providing Plaintiff's name, phone number and home address on ads inviting  
6 people to go to Plaintiff's home with friends to pick up large, heavy furniture and items for free or at  
7 very low prices. Each of the April 18, 2009 ads were posted from the same email address,  
8 sp-----@hotmail.com, linked to the March ads, the same email that Plaintiff had previously identified to  
9 Defendant CRAIGSLIST as belonging to the person who had fraudulently posted the earlier harassing  
10 ads.

11 65. In addition to disclosing Plaintiff's home address, in the April 18<sup>th</sup> posts Defendant SIMPSON  
12 encouraged people to "bring lots of help" and wait around Plaintiff's home in the event he was not home  
13 when they arrived for free furniture or other property. (True and correct copies of the April 18, 2009  
14 Craigslist posts are attached hereto collectively as Exhibit 16 and incorporated herein by this reference.)

15 66. In several of the April 18, 2009, posts Defendant SIMPSON identified Plaintiff's home address  
16 and offered valuable property for free, thereby encouraging and indeed assuring that complete strangers  
17 would personally go to Plaintiff's home, where he lived with his wife and small children, and remain  
18 there even if Plaintiff was not present, with the expectation of getting valuable property for free. The  
19 text of Defendant SIMPSON's numerous separate April 18, 2009, Craigslist postings follow:

20 April 18, 2009, 9:43 a.m.:

21 **"spa...free!! u pick up!**

22 *cal spa only 2 years old, works all accessories, free1, has to be picked up this weekend!,  
23 house foreclosed..moving 4204 d----- 93308, off of olive drive, heavy bring lots of help..I  
24 have bad back(sic)"* (Plaintiff's complete address was included but has been removed  
25 here to protect him from further notoriety.)

26 (A true and correct copy of the post is attached hereto as Exhibit 17 and incorporated  
27 herein by this reference.)

28 ///

1 April 18, 2009, 9:51 a.m.:

2 **"table /6chairs/ couch...free!!**

3 *new tenants moving in on mon. all furniture has to be moved this weekend!!!. Prior*  
4 *renters left, lot's fo nice furnitre, first come first serve!m, bring your truck and help, I can*  
5 *not do any lifting (sic)... 4204 d----- 93308 off of olive drive..."*(Plaintiff's complete  
6 address was included but has been removed here to protect him from further notoriety.)

7 (A true and correct copy of the post is attached hereto as Exhibit 18 and incorporated  
8 herein by this reference.)

9 April 18, 2009, 10:01 a.m.:

10 **"99 mitsubishi eclipse wont pass smog**

11 *Mitsubishi eclipse runs good, needs tags smog, have a clean title, has to go this*  
12 *weekend..moving out of state...come pick up!1..cash only I will not hold this car, first*  
13 *come with the cash gets it! 4204 d----- 93308 off of olive drive."* (sic) (Plaintiff's  
14 complete address was included but has been removed here to protect him from further  
15 notoriety.)

16 (A true and correct copy of the post is attached hereto as Exhibit 19 and incorporated  
17 herein by this reference.)

18 April 18, 2009, 10:33 a.m.:

19 **"65 Chevy Elcamino**

20 *Nice 1965 camino with a s327 small block, 350 turbo auto., run's/drives great, needs*  
21 *paint/interior work, cash only!!! no low ballers! call 661-588-\*\*\*\* or 661 333-6270"*

22 (A true and correct copy of the post is attached hereto as Exhibit 20 and incorporated  
23 herein by this reference.) (Plaintiff's complete home telephone number was included  
24 but has been removed here to protect him from further notoriety.)

25 April 18, 2009, 10:42 a.m.:

26 **"free! washer/dryer, all work great**

27 *Free sears/Kenmore washer and dryer, clean, all work great! Owners left when they*  
28 *moved out...come pick them up this weekend only!, I will be in and out all of this weekend*

1 *if I am not there please wait!....4204 d----. 93308 off of olive drive”*

2 (A true and correct copy of the post is attached hereto as Exhibit 21 and incorporated  
3 herein by this reference.) (Plaintiff’s complete home address was included but has been  
4 removed here to protect him from further notoriety.)

5 April 18, 2009, 11:06 a.m. and 11:08 a.m.:

6 **“mitsubishi big screen tv 60”(in**

7 *projection tv!, super nice picture! 2004 model, sacrifice, must sell this*

8 *weekend!!!...moving, cash only!!! pick it up at 4204 d----- 93308 off of Olive drive I will*  
9 *be in and out all weekend”* (Plaintiff’s complete home address was included but has been  
10 removed here to protect him from further notoriety.)

11 (A true and correct copy of the post is attached hereto as Exhibit 22 and incorporated  
12 herein by this reference.)

13 67. Plaintiff had reasonably relied on Defendant CRAIGSLIST’s promises to take steps to remove  
14 the harassing posts and to prevent further harassing posts about him from being placed on Craigslist.  
15 Then, following the April 18, 2009, Craigslist posts, Plaintiff received numerous harassing, threatening  
16 and repeated contacts at his private home from individuals responding to the posts. Harassing calls were  
17 made to Plaintiff’s home at all hours of the day and night. Several of the calls were explicit, highly  
18 offensive sexual inquiries to Plaintiff. Many of the calls were disturbing and shocking in their graphic  
19 content and highly offensive to Plaintiff and his family members.

20 68. After Defendant SIMPSON’s postings in which valuable property was offered for free and  
21 Plaintiff’s home address was identified, which was known to Defendant SIMPSON through Defendant  
22 FOSTER FARMS’s confidential employment records regarding Plaintiff, large numbers of individuals  
23 responding to the ads appeared without warning at Plaintiff’s home. Following the April 18 ads on  
24 Craigslist, approximately fifty (50) to sixty (60) people personally appeared at Plaintiff’s home, entered  
25 onto his real property and demanded the free property advertised on Defendant CRAIGSLIST.

26 69. Although Defendant CRAIGSLIST was notified before 9:30 a.m. on March 18, 2009, that  
27 Plaintiff was being impersonated and harassed through fraudulent ads on CRAIGSLIST, Defendant  
28 CRAIGSLIST allowed Defendant SIMPSON to continue posting fraudulent and harassing ads targeting



1 the Plaintiff on its site for more than one month thereafter. Each of Defendant SIMPSON's fraudulent  
2 and harassing Craigslist postings was placed using the same email address "sp-----@hotmail.com."  
3 Nonetheless, Defendant CRAIGSLIST allowed Defendant SIMPSON to continue posting harassing  
4 Craigslist ads impersonating the Plaintiff through April 18, 2009.

5 70. From about March 18, 2009, shortly after Plaintiff first learned of the harassing posts, through  
6 April 18, 2009, Plaintiff repeatedly notified Defendant CRAIGSLIST of the fraudulent and harassing  
7 posts appearing on its website, requested that they be removed and was repeatedly assured by Defendant  
8 CRAIGSLIST that steps would be taken to prevent further harassing posts. Plaintiff notified  
9 DEFENDANT CRAIGSLIST of the harassing posts through numerous emails (*See, e.g.,* true and  
10 correct copies of email communications in Exhibits 8, 15, and 23, attached hereto and incorporated  
11 herein by this reference). In addition, Plaintiff made four (4) separate telephone calls to Defendant  
12 CRAIGSLIST from on or about March 18, 2009 to March 21, 2009, informing them of the fraudulent  
13 and harassing ads posted on their site and requesting them to block additional postings. (True and  
14 correct copies of relevant pages of Plaintiff's phone bills reflecting his telephone calls to Defendant  
15 CRAIGSLIST are attached hereto collectively as Exhibit 24 and incorporated herein by this reference.)

16 71. From the time Plaintiff first contacted Defendant CRAIGSLIST on or about March 18, 2009 up  
17 through and including Plaintiff's last contacts with Craigslist in April, Defendant CRAIGSLIST  
18 repeatedly and clearly assured and promised Plaintiff that they would remove the postings and  
19 implement special steps to prevent additional harassing postings targeting Plaintiff on the site. Indeed,  
20 in April, 2009, Defendant CRAIGSLIST actually assured Plaintiff in writing that "*additional* steps have  
21 been taken that may help prevent this issue from happening again." (Emphasis added.) (Defendant  
22 CRAIGSLIST sent a confirming email with this promise, a true and correct copy of which is attached  
23 hereto as Exhibit 16 and incorporated herein by this reference.) Plaintiff reasonably relied on  
24 Defendant CRAIGSLIST's repeated promises to stop the postings. Nonetheless, despite Defendant  
25 CRAIGSLIST's promises, and Plaintiff's reasonable reliance thereon, Defendant CRAIGSLIST allowed  
26 the harassing and fraudulent postings about the Plaintiff to continue to be posted on CRAIGSLIST  
27 through April 18, 2009.

28 ///

1                    **Plaintiff's Workplace Harassment Continues**

2        72.        After the postings seeking homosexual encounters appeared on Craigslist, which Plaintiff did  
3        not disclose to anyone at his place of work with Defendant FOSTER FARMS, Plaintiff was ridiculed  
4        and harassed at his place of work about his sexual orientation.    Plaintiff was subjected to derogatory  
5        sexual gestures from Defendant FOSTER FARMS, through its agents and supervisors, suggesting that  
6        Plaintiff engaged in homosexual practices.

7        73.        Once again, Plaintiff complained to Defendant FOSTER FARMS about the harassing conduct  
8        he was experiencing.    Plaintiff's complaints about said conduct were ignored by Defendant FOSTER  
9        FARMS and its agents and supervisors.

10                   **Defendant SIMPSON was Criminally Prosecuted for the Craigslist Postings**

11        74.        Law enforcement later investigated the Craigslist postings and traced the ads to Plaintiff's work  
12        supervisor Defendant SIMPSON, an agent, supervisor and management-level employee of Defendant  
13        FOSTER FARMS.

14        75.        On or about July 31, 2009, Defendant SIMPSON was arrested for various felony charges  
15        including, but not limited to, the unauthorized use of identifying information of another. Defendant  
16        FOSTER FARMS through its agents and supervisors including CARRENO had disclosed to SIMPSON,  
17        without Plaintiff's consent, Plaintiff's private personal information including his home address and  
18        telephone numbers from his private and confidential employment records. On or about October 29,  
19        2009, Defendant SIMPSON pleaded no contest to two criminal counts based on the Craigslist postings  
20        regarding the Plaintiff. See *People of the State of California v. Michael O. Simpson*, Superior Court of  
21        Kern County, California, case number BF128875A. (Attached hereto as Exhibit 25 and incorporated  
22        herein by this reference is a true and correct copy of the Criminal Calendar- Case Details page which  
23        was available online for Defendant SIMPSON on or about August 14, 2009.)  
24         
25         
26       

27        ///

1 FIRST CAUSE OF ACTION

2 FOR BREACH OF CONTRACT - PROMISSORY ESTOPPEL

3 (Against Defendant CRAIGSLIST and DOES 1 through 50, inclusive)

4 76. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each and every  
5 allegation contained in each of the above paragraphs by this reference as though set forth in full herein.

6 77. Plaintiff is informed and believes that on or about March 18, 2009, and on various dates and  
7 times thereafter Plaintiff specifically informed Defendant CRAIGSLIST and DOES 1 through 100,  
8 inclusive, that an imposter was impersonating him on Craigslist for the specific purpose of posting false  
9 and harassing ads intended to harass, defame and harm the Plaintiff. Plaintiff further informed  
10 Defendant CRAIGSLIST that as a result of the posts he had received numerous sexually graphic calls  
11 and later that he had dozens of people showing up at his home in search of free items. Defendant  
12 promised Plaintiff that they would "take care of it." CRAIGSLIST then identified the poster as using  
13 the email address sp-----@hotmail.com and promised the Plaintiff that they would remove the posts and  
14 take steps to prevent any further harassing postings of or relating to the Plaintiff in any way.

15 Defendant CRAIGSLIST further promised that they would take steps to prevent further posts identifying  
16 anything about the Plaintiff including his telephone numbers or home address to be placed on Craigslist  
17 by the same individual using the sp-----@hotmail.com email. Moreover, in April, 2009, after more  
18 harassing posts about the Plaintiff were put on Craigslist, despite their earlier promises to the Plaintiff to  
19 prevent such postings, Defendant CRAIGSLIST further promised the Plaintiff that "additional steps  
20 have been taken that may help prevent this issue from happening again." (Emphasis added.) (See  
21 Exhibit 16, attached hereto and incorporated herein by this reference.)

22 78. Plaintiff reasonably relied on Defendant CRAIGSLIST's promises to remove the posts about him  
23 and prevent any further harassing posts about him from being placed on Craigslist including those made  
24 from the same "reply email" address sp-----@hotmail.com. Plaintiff's reliance on the Defendant's  
25 promise was reasonable, since Defendant CRAIGSLIST had prior notice of the fraudulent and harassing  
26 nature of the posts about him, had promised to prevent further posts and had the unique ability to  
27 immediately remove said posts and prevent additional similar ads from being posted from the same  
28 source. Indeed, when Plaintiff identified the first fraudulent posting on or about March 18, 2009,

1 Defendant CRAIGSLIST removed the offending post within *seven minutes* of receiving Plaintiff's email  
2 complaining about it. (True and correct copies of Plaintiff's March 18, 2009, email sent at 09:57:41  
3 a.m. to CRIAGLIST and their responsive email sent at 10:04:10 a.m. are attached hereto as Exhibits 10  
4 and 14, respectively, and incorporated herein by this reference.) Accordingly, Plaintiff's reliance on  
5 Defendant CRAIGSLIST's promise to remove and prevent further posts was reasonable.

6 79. As a result of his reasonable reliance on Defendant CRAIGSLIST's promise, and believing the  
7 problem of harassing Craigslist posts was solved, Plaintiff took no other action to remove the posts or  
8 prevent further posts from appearing on the craigslist.org website. Consequently, the additional  
9 subsequent harassing postings that appeared on the website in April were unknown to the Plaintiff at the  
10 time they were posted. In fact, Plaintiff had no knowledge that additional false and harassing posts  
11 about him were placed on Craigslist in April until, with no warning whatsoever, people began personally  
12 showing up at Plaintiff's home to pick up "free" property that had been fraudulently advertised on  
13 Craigslist by the same individual, Plaintiff's boss Defendant SIMPSON.

14 80. Plaintiff is informed and believes that Defendant CRAIGSLIST and DOES 1 through 100,  
15 inclusive, knew or should have known that promising Plaintiff additional steps were taken to prevent  
16 additional harassing posts about him from being put on craigslist.org again, would have caused Plaintiff  
17 to reasonably be induced to act or forbear in his actions. Moreover, Defendant CRAIGSLIST knew or  
18 should have known that its promise to act would reasonably induce Plaintiff to forbear from taking any  
19 further action to prevent further postings.

20 81. Based on Defendant CRAIGSLIST's inducement for Plaintiff to forbear, Plaintiff in fact did  
21 forbear his right to verify on his own that there would be no further postings. It was not until the return  
22 of the inappropriate phone calls for homosexual sex, calls seeking property items that Plaintiff did not  
23 own, along with the sudden appearance at Plaintiff's home of people seeking to pick up free property,  
24 did Plaintiff discover that, to his detriment, more fraudulent postings were allowed to be placed on the  
25 Craigslist website by the same poster.

26 82. Defendant did not perform its promises, assurances and representations to prevent harassing  
27 posts impersonating and about the Plaintiff from being put on the Craigslist website. Thus, enforcing  
28 Defendant CRAIGSLIST's promise that the fraudulent postings would be removed and would not be

1 allowed to be posted again is the only way in which injustice would be prevented.

2 83. As a direct, proximate, and legal result of Defendant CRAIGSLIST failure to perform according  
3 to its repeated promises to the Plaintiff, Plaintiff has suffered damages and has suffered personal  
4 injuries, including but not limited to humiliation, mental anguish, emotional and physical distress, and  
5 has been injured in mind and body including but not limited to medical expenses and other expenses.  
6 As a result of such failure to perform according to Defendant's promise, Plaintiff has suffered damages  
7 in an amount according to proof and well in excess of the minimum jurisdiction of the Superior Court.

8 84. As a further and direct, proximate, and legal result of the unlawful conduct of Defendant  
9 CRAIGSLIST's herein above alleged, Plaintiff has suffered loss of earnings, including but not limited to  
10 losing paid time off due to missing numerous days and/or weeks due to the emotional distress caused by  
11 Defendant CRAIGSLIST's wrongful acts, in an amount according to proof and well in excess of the  
12 minimum jurisdiction of the Superior Court.

13 85. As a further and direct, proximate, and legal result of the unlawful conduct of Defendant  
14 CRAIGSLIST, herein above alleged, Plaintiff has incurred, and will incur, expenses in prosecution of  
15 this action in an amount according to proof and well in excess of the minimum jurisdiction of the  
16 Superior Court.

17 86. The conduct of Defendant CRAIGSLIST, as herein above alleged, was done intentionally and  
18 with malice, fraud, and/or oppression, or with such reckless indifference to and disregard for Plaintiff's  
19 rights and welfare as to justify an award of exemplary damages against Defendant CRAIGSLIST. All of  
20 such conduct by Defendant CRAIGSLIST was approved, authorized, ratified, and/or carried out at the  
21 direction and with knowledge, consent and acquiescence of Defendant CRAIGSLIST's employees or  
22 agents. WHEREFORE, Plaintiff prays for relief as set forth hereinafter.

23  
24 **SECOND CAUSE OF ACTION**

25 **FOR UNFAIR COMPETITION PURSUANT TO**  
26 **BUSINESS AND PROFESSIONS CODE § 17200**

27 **(Against Defendant CRAIGSLIST and DOES 1 through 50, inclusive)**

28 87. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each and every

1 allegation contained in each of the above paragraphs by this reference as though set forth in full herein.

2 88. Plaintiff is informed and believes that Defendant CRAIGSLIST and DOES 1 through 100,  
3 inclusive, in the course and scope of business engaged in unlawful and/or unfair business practices and  
4 activities, including but not limited to operating the website www.craigslist.org in a manner that creates  
5 an unfair competition standard compared to other websites providing the same or similar services  
6 provided by Defendant CRAIGSLIST.

7 89. Plaintiff is informed and believes, and thereon alleges that beginning at an exact date unknown to  
8 Plaintiff but at least since March 16, 2009, Defendant CRAIGSLIST and DOES 1 through 50, inclusive,  
9 has committed acts of unfair competition, as defined by *Business and Professions Code* § 17200 by  
10 engaging in the following practices:

11 a. Defendant CRAIGSLIST has established its dominance in online classified  
12 advertising by eschewing the sign-up screening and identification procedures utilized by its  
13 competitors. Competing online classified advertising websites require users seeking to  
14 advertise online to first provide detailed personal identifying data, such as their name, address,  
15 telephone number, and other personal data, to assure such users are accurately identified *before*  
16 they can become members and begin posting ads on their sites. (*See, e.g.,* true and correct copies  
17 of relevant pages of the account signup pages from competing websites such as Yahoo, eBay,  
18 Oodle, Garagesaletime, Commuto, and Redbeacon, attached hereto collectively as Exhibit 4 and  
19 incorporated herein by this reference.) Defendant CRAIGSLIST, however, does not require any  
20 identifying or screening information of any kind from its users before they are allowed to post  
21 online.

22 b. In order to post an ad on Craigslist one is not expected, required or even able to  
23 present any identifying information, credentials or even a name; only a working email address is  
24 requested. (A true and correct copy of the "account signup" page from Craigslist is attached  
25 hereto as Exhibit 5 and incorporated herein by this reference.) One seeking to post something,  
26 or anything, on CRAIGSLIST is only required to log onto Defendant's website,  
27 www.craigslist.org, enter an email address and select a password. At that point the user is free to  
28 assume the identity of anyone and post any classified ad for quite literally anything (see

1 examples of illicit postings including those involving impersonation and identity theft and other  
2 alleged criminal behavior set forth at ¶ 48 *supra*). Moreover, an email address is notoriously  
3 easy to acquire, providing no verification of identity or assurance of trust whatsoever. It is  
4 strikingly easy to assume some else's identify and post material on Defendant CRAIGSLIST.  
5 Thus, due to its complete and utter lack of user-screening or identity-verification requirements of  
6 any kind, Defendant CRAIGSLIST caused Defendant SIMPSON to impersonate the Plaintiff on  
7 the Craigslist website and post harassing, fraudulent and harmful internet ads specifically  
8 targeting the Plaintiff.

9 90. The acts and practices of Defendant CRAIGSLIST and DOES 1 through 50, inclusive, in  
10 allowing anonymous posters with no verification of their identities to impersonate and assume the  
11 identity of others and advertise anything on its website, violates Business and Professions Code section  
12 17200 in that it is unlawful , unfair and fraudulent in the following respects:

13 a. UNLAWFUL BUSINESS PRACTICES - Defendant CRAIGSLIST's policy and  
14 practice of not verifying or even obtaining the identity of its users and allowing anyone to  
15 assume the identity of someone else and post anything on the Craigslist website in the name of  
16 another person threatens an incipient violation of laws proscribing impersonation and identity  
17 theft including but not limited to California Penal Code §§ 529.2 and 530.5(a) (for which  
18 Defendant SIMPSON was prosecuted over the Craigslist posts at issue herein, Exh. 25 attached  
19 hereto) as well as Federal Trade Commission acts or rules prohibiting identity theft and  
20 impersonation, or violates the policy or spirit of such laws or otherwise significantly threatens or  
21 harms competition. Further, Defendant CRAIGSLIST's conduct threatens an incipient  
22 violation of a consumer/antitrust law, including but not limited to the California Consumer Legal  
23 Remedies Act, and laws preventing false advertising, harassment, child pornography, solicitation  
24 of murder, rape, and other actionable and criminal conduct and further violates the policy or  
25 spirit of such laws and otherwise significantly threatens and harms competition;

26 b. UNFAIR BUSINESS PRACTICES - Competing online classified advertising  
27 websites require users seeking to advertise online to first provide detailed personal identifying  
28 data, such as their name, address, telephone number, and other personal data, to verify that such

1 users are accurately identified before they are allowed to become members and begin posting ads  
2 on their sites. (See, e.g., Exhibit 4 attached hereto and incorporated herein by this reference.)  
3 Defendant CRAIGSLIST, however, has policies and practices which do not require or even  
4 provide for any identity verification or screening of any kind from its users before they are  
5 allowed online to post. Consequently, Defendant CRAIGSLIST's policy and practices of not  
6 verifying or even obtaining the identity of its posters give it an unfair competitive advantage over  
7 other competing websites;

8 c. FRAUDULENT BUSINESS PRACTICES - Defendant CRAIGSLIST's practice and  
9 policy of not requiring or obtaining any identifying or screening information of any kind from its  
10 users before they are allowed to post online is likely to, and does in fact, result in false and  
11 deceptive ads posted on Craigslist, which is what happened in this case, and is thus likely to  
12 mislead the general public and, consequently, constitutes a fraudulent business act or practice  
13 within the meaning of Business and Professions Code section 17200.

14 91. The harm caused to Plaintiff and to members of the general public by the Defendant  
15 CRAIGSLIST's unfair, unlawful and fraudulent conduct in not requiring users to *accurately* identify  
16 themselves in any way prior to posting and in allowing such unidentified users to post virtually anything  
17 on Craigslist, including many untoward, harassing and illicit postings on any subject, some of which are  
18 set forth in Paragraph 48, *supra*, far outweighs the utility of the Defendant's policy and practice of not  
19 requiring identifying information from posters. Consequently, Defendant CRAIGSLIST's policy and  
20 practice of not accurately verifying the identity of posters prior to allowing them to post ads on the  
21 website constitutes an unfair business act or practice within the meaning of Business and Professions  
22 Code section 17200.

23 92. Defendant CRAIGSLIST's practice and policy of not verifying the identity of users seeking to  
24 post on the Craigslist website is inconsistent with the identity-verification practices and policies  
25 followed by competing internet websites, constituting an unfair business act or practice within the  
26 meaning of Business and Professions Code section 17200.

27 93. The unlawful, unfair and fraudulent business practices and false and misleading advertising on  
28 the craigslist.org website owned and operated by Defendant CRAIGSLIST, as described above, present



1 a continuing threat to members of the public in that countless individuals will be allowed to  
2 anonymously access the craigslist.org website and use it to engage in further criminal, unfair, fraudulent  
3 and harassing conduct against members of the public. Such conduct will include further impersonations  
4 as well as other criminal acts against unsuspecting viewers of the Craigslist website such as murder,  
5 prostitution including underage prostitution, theft and burglary, as well as further harassment of  
6 individuals over the internet. Consequently, the unfair and fraudulent business practices of Defendant  
7 CRAIGSLIST presents a continuing threat to members of the public to be exposed to various  
8 misleading, deceptive, and criminal misconduct perpetrated by countless anonymous Craigslist users  
9 many of whom have assumed the identity of others.

10 94. As a direct, proximate and legal result of the aforementioned acts, Defendant  
11 CRAIGSLIST received and continues to receive unprecedented internet posts and internet traffic, with  
12 resulting income, belonging to members of the public who access the site believing all posts are  
13 legitimate and who are exposed to the misleading, deceptive and criminal behavior committed on or  
14 through the site. WHEREFORE, Plaintiff prays for relief as set forth hereinafter.

15  
16 **THIRD CAUSE OF ACTION**

17 **DISCRIMINATION IN EMPLOYMENT – HARASSMENT, SEXUAL HARASSMENT,**  
18 **HOSTILE WORK ENVIRONMENT**

19 **(Against Defendants FOSTER FARMS, CARRENO, SIMPSON and DOES 51-100)**

20 95. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each and every  
21 allegation contained in each of the above paragraphs by this reference as though set forth in full herein.

22 96. Defendant FOSTER FARMS, through its agents and supervisors, including Defendants  
23 CERRANO and SIMPSON, and each of them, engaged in a pattern and practice of unlawful harassment,  
24 and sexual harassment by subjecting Plaintiff to severe and pervasive, offensive, unwanted, and  
25 harassing comments and physical and verbal contact of a harassing nature, which created a hostile  
26 working environment for Plaintiff. Defendant CARRENO openly and in a threatening manner referred  
27 to himself as “ruthless” in his treatment of his employees including but not limited to the Plaintiff, and  
28 treated the Plaintiff in such a manner. Said conduct by Defendant FOSTER FARMS, through its agents

1 and supervisors, included, but was not limited to comments and mocking conduct regarding Plaintiff's  
2 sexuality, derisive and mocking comments to the Plaintiff that he had a "girlfriend" at work, mocking  
3 and offensive comments, ridicule and behavior whenever Plaintiff attempted to express his right to be  
4 free from harassment on the job, and repeated and pervasive comments and conduct by Defendant  
5 FOSTER FARMS supervisors and managers in Plaintiff's presence of a sexually harassing nature  
6 toward and about female employees.

7 97. The above-described unwelcome, harassing and sexually harassing conduct created an  
8 intimidating, oppressive, hostile and offensive work environment which interfered with Plaintiff's  
9 emotional well-being.

10 98. At all times mentioned herein, Plaintiff SCOTT P. was an employee within  
11 Defendant FOSTER FARMS. Throughout Plaintiff's employment at Defendant FOSTER FARMS from  
12 in or about 2004 to the present, Defendants CARRENO and SIMPSON, acting as a manager and  
13 supervisor in the course and scope of their employment within Defendant FOSTER FARMS, and who  
14 was Plaintiff's supervisor, regularly, repeatedly, and continuously exposed Plaintiff to severe and  
15 pervasive, offensive, unwanted, and harassing comments including but not limited to those described in  
16 previous paragraphs, and physical and verbal contact of a nature which created a hostile working  
17 environment for Plaintiff. Additionally, CERRANO and SIMPSON's inappropriate behavior toward  
18 Plaintiff was so obvious that it became a topic of office humor, further exacerbating Plaintiff's  
19 humiliation and stress.

20 99. Plaintiff SCOTT P. was subjected to unwarranted harassing conduct by Defendant FOSTER  
21 FARMS, through its agents and supervisors including but not limited to CERRANO and SIMPSON, and  
22 the harassing conduct was so severe, pervasive, widespread, and/or persistent that any reasonable person  
23 in Plaintiff's circumstances would have considered the work environment to be hostile or abusive.  
24 Plaintiff SCOTT P. himself subjectively considered his work environment to be hostile and/or abusive.  
25 The above-described harmful, harassing, and hostile conditions to which Plaintiff was subjected were  
26 unwanted and occurred at the workplace, at a work-sponsored event, or otherwise in the course of  
27 Plaintiff's employment within Defendant FOSTER FARMS. At no time did Plaintiff ever give any  
28 encouragement or indication that he welcomed the harassment.

1 100. Defendant FOSTER FARMS, through its agents and supervisors including Defendants  
2 CERRANO and SIMPSON extended the harassment of Plaintiff to the internet when in March of 2009  
3 and continuing through about April 18, 2009, they impersonated the Plaintiff on the Craigslist website  
4 and began posting personal ads portraying Plaintiff as a recently divorced, closeted homosexual who  
5 was seeking homosexual encounters with strange men. Defendants disclosed in those online ads  
6 Plaintiff's private home telephone number and his cell phone number, both of which were improperly  
7 accessed and obtained from Plaintiff's confidential FOSTER FARMS employment files, and encouraged  
8 homosexual men to call the Plaintiff at all hours of the day and night for sex, which they did. The  
9 Defendants also posted other false ads which disclosed Plaintiff's home address, also improperly  
10 accessed and obtained from Plaintiff's confidential FOSTER FARMS employment files, and encouraged  
11 large numbers of strangers to personally visit Plaintiff's home seeking to obtain valuable property for  
12 free. As a legal result of Defendants' conduct, Plaintiff did in fact receive numerous harassing phone  
13 calls on his home and cell phone number from men seeking to have sex with the Plaintiff, Plaintiff did in  
14 fact receive other harassing, intrusive phone calls, and Plaintiff did further endure large numbers of  
15 strangers showing up at Plaintiff's home seeking valuable property for free or at low cost. Many of the  
16 callers to Plaintiff's home used obscene and graphic language to express their sexual interest or were  
17 otherwise obscene or offensive. The calls and contact caused by the Defendants was harassing and  
18 harmful to Plaintiff and his family. Following the Craigslist internet posts, Plaintiff was ridiculed and  
19 subjected to obscene sexual gestures at work related to sexual orientation.

20 101. At all times mentioned herein, Plaintiff was willing and able to perform the duties and  
21 functions of his position if the harassing behavior was eliminated.

22 102. Defendants' actions, as described in this complaint, violated applicable law including the  
23 provisions of the FEHA California *Government Code* §§ 12940(h), 12940(I), 12940(j), 12940(k), and  
24 California *Civil Code* § 51.9, et seq. Each of the Defendants' conduct constituted sexual harassment  
25 prohibited by Article 1, Section 8 of the California Constitution.

26 103. As a direct, proximate and legal result of the unlawful, harassing and discriminatory conduct of  
27 Defendant FOSTER FARMS and its agents and supervisors including but not limited to CARRENO and  
28 SIMPSON, and DOES 51 through 100, Inclusive, in preventing the harassing and discriminating

1 conduct herein above alleged, Plaintiff has been damaged and has suffered personal injuries, including  
2 but not limited to humiliation, mental anguish, emotional and physical distress, and has been injured in  
3 mind and body. Specifically, as a proximate and legal result of Defendants' failure to refrain from  
4 and/or prevent harassing conduct, Plaintiff was made to endure further continuous sexual harassment.  
5 As a result of such discrimination, harassment and hostile conduct and consequent harm, Plaintiff has  
6 suffered damages in an amount according to proof and well in excess of the minimum jurisdiction of the  
7 Superior Court.

8 104. As a further and direct, proximate, and legal result of the unlawful conduct of defendants  
9 herein above alleged, Plaintiff has suffered loss of earnings, including but not limited to losing paid time  
10 off due to missing numerous days and/or weeks due to the emotional distress caused by defendants'  
11 wrongful acts, in an amount according to proof and well in excess of the minimum jurisdiction of the  
12 Superior Court.

13 105. As a further and direct, proximate, and legal result of the unlawful, harassing and  
14 discriminatory conduct of the defendants, and each of them, herein above alleged, Plaintiff has incurred,  
15 and will incur, attorney's fees in prosecution of this action in an amount according to proof and well in  
16 excess of the minimum jurisdiction of the Superior Court.

17 106. The conduct of each defendant, as herein above alleged, was done intentionally and with  
18 malice, fraud, and/or oppression, and with reckless indifference to and disregard for Plaintiff's rights and  
19 welfare. All of such conduct by defendants was approved, authorized, ratified, and/or carried out at the  
20 direction and with knowledge, consent and acquiescence of defendants' management-level employees or  
21 agents.

22 107. Plaintiff timely filed complaints with the Department of Fair Employment and Housing (DFEH)  
23 against the defendants for harassment and retaliation, which were filed within one year of the date of the  
24 adverse actions by defendants. On or about October 22, 2009, Plaintiff received Right-to-Sue letters  
25 from DFEH allowing a civil action against the defendants for injuries and damages, and timely files this  
26 complaint within one year of the date of the Right-to-Sue letters.

27 ///

1 **FOURTH CAUSE OF ACTION**

2 **FOR NEGLIGENT HIRING, RETENTION AND SUPERVISION**

3 **(Against Defendant FOSTER FARMS, CARRENO and DOES 51 through 100, Inclusive)**

4 108. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each and  
5 every allegation contained in each of the above paragraphs by this reference as though set forth in full  
6 herein.

7 109. At all times mentioned herein, Defendant SIMPSON was an agent and supervising employee at  
8 Defendant FOSTER FARMS as well as Plaintiff's supervisor.

9 110. At all times mentioned herein, Defendant SIMPSON was incompetent and/or unfit to be an  
10 employee of Defendant FOSTER FARMS, CARRENO, and DOES 51 through 100, Inclusive, including  
11 but not limited to defendant SIMPSON being a harasser and committing acts of retaliation upon Plaintiff  
12 for complaining about certain events at FOSTER FARMS' including its use of non-union employees.

13 111. Beginning in or about 2005 and continuing through at least April of 2009, Defendants knew, or  
14 reasonably should have known, that Defendants CARRENO and SIMPSON, high ranking managers and  
15 supervisors, were engaging in the unlawful behavior described herein above. Moreover, Defendant  
16 FOSTER FARMS knew, or should have known, that CARRENO and SIMPSON had a history of  
17 engaging in prior harassing and sexually harassing, abusive and hostile conduct and comments in the  
18 workplace toward other employees who had made repeated complaints about said conduct and  
19 comments. Defendant FOSTER FARMS, through its agents and supervisors including Defendant  
20 CARRENO, knew of SIMPSON's prior misconduct and sexually harassing behavior and took no action  
21 to stop such misconduct and harassing behavior or prevent it from happening again.

22 112. At all times material herein, Defendants knew, or reasonably should have known, that the  
23 conduct, acts and failures to act of all other Defendants and/or supervisors, agents and employees as  
24 described herein above violated Plaintiff's rights under federal, state and municipal statute, codes and  
25 ordinances.

26 113. Defendants, and each of them, owed Plaintiff a duty to protect him from managers, supervisors  
27 and employees who they knew or should have known created a risk of injury or harm to him.  
28 Defendants, and each of them, breached such duty by hiring CARRENO and SIMPSON. The

1 Defendants knew, or should have known with reasonable diligence, that they should not have hired  
2 Defendants including but not limited to SIMPSON because, due to their history, they were not fit for the  
3 workplace, and were not fit to serve as high-ranking managers and supervisors. Further, Defendants,  
4 and each of them, breached such duty by continuing to employ Defendants CARRENO and SIMPSON  
5 and by failing to adequately supervise them in the workplace despite the fact that they knew, or should  
6 have known, that they were openly and repeatedly engaging in pervasive misconduct in the workplace  
7 that was hostile, harassing and sexually harassing, offensive, demeaning and damaging to Plaintiff and  
8 other employees.

9 114. Plaintiff is informed and believes, and based thereon alleges, that Defendants FOSTER FARMS  
10 and DOES 51 through 100, inclusive, hired and/or retained Defendant SIMPSON and other supervisory  
11 employees who were incompetent and/or unfit employees, after Defendant FOSTER FARMS, through  
12 its agents and supervisors including Defendant CARRENO knew, or should have known, of the  
13 supervisory employees' and Defendant SIMPSON's incompetence and/or unfitness, including their  
14 harassing, abusive behavior and other misconduct on the job. Defendants knew or should have known  
15 that Defendant SIMPSON and other supervisory employees were engaging in harassing conduct toward  
16 Plaintiff and had previously engaged in such conduct toward other employees. Defendant FOSTER  
17 FARMS knew or should have known of other supervisory employees' and Defendant SIMPSON's  
18 history of misconduct. Moreover, Defendant FOSTER FARMS knew or should have known of other  
19 prior harmful misconduct by supervisory employees including Defendant CARRENO and Defendant  
20 SIMPSON, as it was pervasive, continuing, regular, and blatant. However, even after having actual  
21 and/or constructive knowledge of Defendant SIMPSON's, and other supervisory employee's, unfitness  
22 and/or incompetence which posed a particular harm to Plaintiff—an employee, Defendants FOSTER  
23 FARMS and DOES 51 through 100, inclusive, retained Defendants CARRENO and SIMPSON as  
24 manager and supervisor, and agents of FOSTER FARMS, and retained others as supervisors and agents,  
25 allowing them to continue their inappropriate and harmful behavior toward Plaintiff.

26 115. Defendants FOSTER FARMS and DOES 51 through 100, and each of them, owed Plaintiff a  
27 duty to protect him from employees who they knew or should have known created a risk of injury to  
28 him. Defendants, and each of them, breached such duty by continuing to employ individuals including

1 but not limited to Defendants CARRENO and SIMPSON who had demonstrated a propensity to engage  
2 in harmful misconduct toward subordinate employees such as the Plaintiff and by failing to adequately  
3 supervise the workplace despite the fact that they knew, or should have known, that the workplace was  
4 permeated with harassing, defamatory, hostile and sexually harassing behavior which was hostile,  
5 offensive, and demeaning to Plaintiff and other employees.

6 116. Defendants, and each of them, knew, or in the exercise of reasonable care should have known,  
7 that unless Defendants, and each of them, intervened to protect Plaintiff, and to adequately screen,  
8 supervise, prohibit, control, regulate, discipline, and/or otherwise penalize the conduct, acts and failure  
9 to act of the Defendants and others as described herein, Defendants' failure to so screen, protect,  
10 supervise, and intervene would have the effect of encouraging, ratifying, condoning, exacerbating,  
11 increasing and worsening said conduct, acts and failures to act.

12 117. At all times mentioned herein, Defendants, and each of them, had the power, ability, authority,  
13 and duty to so screen, intervene, supervise, prohibit, control, regulate, discipline, and/or penalize such  
14 conduct, acts, and failures to act, or to otherwise protect Plaintiff.

15 118. Despite said knowledge, power and duty, Defendants and each of them negligently failed to act  
16 so as to prevent, supervise, prohibit, control, regulate, discipline, and/or penalize such conduct, acts and  
17 failures to act, or to otherwise protect Plaintiff.

18 119. As a direct, proximate, and legal result of the failure of Defendants to protect Plaintiff and to  
19 adequately screen, hire, supervise, prohibit, control, regulate, discipline, and/or otherwise penalize the  
20 conduct, acts and failures to act of all other Defendants and/or supervisors, agents, employees as alleged  
21 herein above, said conduct, acts, and failures to act were perceived by them as, and in fact had the effect  
22 of, ratifying, encouraging, condoning, exacerbating, increasing, and /or worsening said conduct, acts and  
23 failures to act.

24 120. At all times material herein, the failure of Defendants, and each of them, to protect Plaintiff, and  
25 to adequately supervise, prohibit, control, regulate, discipline, and/or otherwise penalize the conduct,  
26 acts, and failures to act of all other Defendants and /or supervisors, agents or employees violated  
27 Plaintiff's rights under federal, state, and municipal statutes, codes and ordinances.

28 ///

1 121. As a direct, legal and proximate result of Defendants' actions, Plaintiff has suffered and will  
2 continue to suffer pain and suffering, and extreme and severe mental anguish and emotional distress, and  
3 physical injuries, including but not limited to humiliation, mental anguish, shock, fright, pain, anxiety,  
4 emotional distress and physical distress, and has been injured in mind and body all to his general  
5 damages. Plaintiff is thereby entitled to general and compensatory damages in amounts according to  
6 proof at trial and well in excess of the minimum jurisdiction of the Superior Court.

7 122. As a further and proximate legal result of the unlawful conduct of defendants, and each of  
8 them, herein above alleged, Plaintiff has suffered and will continue to suffer medical expenses for  
9 treatment by psychotherapist and other health professionals, and for incidental expenses; and he has  
10 suffered and will continue to suffer loss of earnings and other employment benefits and job  
11 opportunities. Plaintiff is thereby entitled to general and compensatory damages in amounts according  
12 to proof at trial and well in excess of the minimum jurisdiction of the Superior Court.

13 123. Plaintiff is informed and believes that the aforesaid acts were carried out with conscious  
14 disregard and reckless indifference of Plaintiff's right to be free from such tortious behavior, such as to  
15 constitute oppression, fraud or malice pursuant to California *Civil Code* § 3924. All of such conduct by  
16 Defendant SIMPSON was approved, authorized, ratified, and/or carried out at the direction and with the  
17 knowledge, consent and acquiescence of Defendant FOSTER FARMS' employees, supervisors, or  
18 agents.

19  
20 **FIFTH CAUSE OF ACTION**

21 **FOR INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

22 **(Against Defendants FOSTER FARMS, CARRENO, SIMPSON and DOES 51 through 100)**

23 124. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each and  
24 every allegation contained in each of the above paragraphs by this reference as though set forth in full  
25 herein.

26 125. At all times mentioned herein, a special relationship existed between the parties in that  
27 the Defendant FOSTER FARMS, was the employer of Plaintiff.

28 126. At all relevant times alleged herein, Plaintiff was employed in good standing with



1 Defendants FOSTER FARMS and DOES 51 through 100, Inclusive, and under the direct supervision of  
2 Defendant SIMPSON, and DOES 51 through 100, Inclusive.

3 127. During the course of Plaintiff's employment at FOSTER FARMS, Defendants FOSTER  
4 FARMS, CARRENO and SIMPSON abused their special relationship and supervisory position over  
5 Plaintiff by engaging in extreme and outrageous conduct by intentionally and/or recklessly subjecting  
6 Plaintiff to severe and pervasive, offensive, unwanted, and harassing sexual comments on a regular and  
7 continuous basis. Moreover, Defendant SIMPSON, with the knowledge, consent and encouragement of  
8 Defendants FOSTER FARMS and CARRENO, continued to harass and retaliate against Plaintiff at  
9 work, and by repeatedly posting harmful and offensive fraudulent ads of and concerning the Plaintiff on  
10 the Craigslist website, as more fully described hereinabove. Such extreme and outrageous conduct  
11 includes but is not limited to those described in previous paragraphs including impersonating the  
12 Plaintiff on the Craigslist website for the purpose of harassing him with homosexual personal ads and  
13 other ads falsely offering property at low prices or free and encouraging people to visit Plaintiff's home,  
14 the address of which was disclosed by the Defendants. At the same time as the Craigslist postings, the  
15 Defendants, and each of them, engaged in physical contact and verbal comments of a nature that created  
16 a hostile working environment for Plaintiff, including making SIMPSON's inappropriate behavior  
17 toward Plaintiff a topic of office humor, further exacerbating Plaintiff's humiliation and stress by  
18 subjecting plaintiff to taunts and jibes at his expense. Following the Craigslist internet posts, Plaintiff  
19 was ridiculed and subjected to obscene sexual gestures at work related to sexual orientation.

20 128. Defendants, and each of them, ratified such conduct by failing and/or refusing to take any and all  
21 reasonable steps necessary to prevent such conduct from occurring, by failing to take appropriate  
22 corrective action following such conduct, and, in the case of Defendant SIMPSON, who held a  
23 supervisory position with FOSTER FARMS, by engaging in the conduct as alleged herein. Defendant  
24 FOSTER FARMS, through its agents and supervisors including but not limited to Defendant  
25 CARRENO permitted this extreme and outrageous conduct by SIMPSON and others to continue.  
26 Defendant SIMPSON, and other supervisory employees, continued their abusive, harassing,  
27 discriminatory, and otherwise extreme and outrageous behavior towards Plaintiff. Further, all  
28 Defendants knew, or should have known, that such conduct was recurring and continuing.

1 129. The conduct of Defendants FOSTER FARMS, CARRENO and SIMPSON was extreme and  
2 outrageous, and intentionally done for the purpose of causing Plaintiff to suffer severe emotional  
3 distress, including substantial and long lasting suffering, anguish, fright, nervousness, grief, anxiety,  
4 worry, shock, humiliation, shame, and physical distress. Moreover, the conduct of Defendants FOSTER  
5 FARMS, CARRENO and SIMPSON was done with a wanton and reckless disregard of the  
6 consequences to Plaintiff, knowing that Plaintiff was present when Defendant SIMPSON's, and others',  
7 extreme and outrageous conduct occurred.

8 130. As a direct, proximate, and legal result of the aforementioned acts, Plaintiff has suffered  
9 severe humiliation, mental anguish, and emotional and physical distress, and has been injured in mind  
10 and body including shock to the nervous system, severe emotional distress, physical illness, all to the  
11 Plaintiff's general damages in an amount according to proof at trial and well within the jurisdiction of  
12 the Superior Court.

13 131. The aforementioned acts of defendants were willful, wanton, malicious, and oppressive  
14 were carried out with a conscious disregard for the Plaintiff's rights and thereby justify an award of  
15 punitive damages in an amount according to proof at trial.

16 132. As a further and proximate legal result of the unlawful, harassing and discriminatory  
17 conduct of the defendants, and each of them, herein above alleged, Plaintiff has incurred, and will incur,  
18 attorney's fees in prosecution of this action in an amount according to proof and well in excess of the  
19 minimum jurisdiction of the Superior Court.

20  
21 **SIXTH CAUSE OF ACTION**

22 **FOR RETALIATION**

23 **(Against Defendants FOSTER FARMS, CARRENO, SIMPSON and DOES 51 through 100)**

24 133. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each and  
25 every allegation contained in each of the above paragraphs by this reference as though set forth in full  
26 herein.

27 134. Plaintiff is informed and believes, and thereon alleges, that by virtue of and as a result of  
28 his objection to the harassment of Defendants CARRENO and SIMPSON and other supervisors at

1 Defendant FOSTER FARMS beginning in or about 2004, his filing of a workplace stress and on-the-job  
2 injury claim, and his complaints regarding harassment made to Defendant FOSTER FARMS, Defendant  
3 CARRENO and the DFEH, he suffered adverse employment action and retaliation by Defendant  
4 FOSTER FARMS and Defendant SIMPSON and other employees of Defendant FOSTER FARMS,  
5 including by high-level administrative and supervisory staff. This adverse employment action and  
6 retaliation included but was not limited to Plaintiff receiving unfair treatment through initially being  
7 demoted from a more advantageous sales position to a less lucrative position as a loader. This demotion  
8 came as a result of Plaintiff reporting information that Defendant FOSTER FARMS was providing jobs  
9 to non-union workers, where those jobs were supposed to be secured for union workers. Plaintiff  
10 reported this information, but no assistance was provided. Thereafter, Plaintiff was demoted and  
11 received about a 25% salary decrease as a result. Additionally, Plaintiff was specifically addressed and  
12 harassed by the highest ranking members of Defendant FOSTER FARMS, who personally warned  
13 Plaintiff that he "best be good." Moreover, Defendant SIMPSON, with the knowledge, consent and  
14 encouragement of Defendant FOSTER FARMS, through its agents and supervisors including Defendant  
15 CARRENO continued to harass and retaliate against Plaintiff at work, and outside of work, by  
16 repeatedly posting harmful and offensive fraudulent ads of and concerning the Plaintiff on the Craigslist  
17 website, as more fully described hereinabove.

18 135. As a proximate and legal result of the unlawful, harassing, discriminatory, and retaliatory  
19 conduct of Defendant SIMPSON, and the failure of Defendant FOSTER FARMS, CARRENO, and  
20 DOES 51 through 100, Inclusive, in preventing the harassing, discriminating, and retaliatory conduct  
21 herein above alleged both by Defendant SIMPSON and other employees of Defendant FOSTER  
22 FARMS, Plaintiff has been damaged and has suffered personal injuries, including but not limited to  
23 humiliation, mental anguish, emotional and physical distress, and has been injured in mind and body,  
24 including having to seek medical treatment from his physicians on at least two separate occasions. As a  
25 result of such discrimination, harassment and hostile conduct and consequent harm, Plaintiff has  
26 suffered damages in an amount according to proof and well in excess of the minimum jurisdiction of the  
27 Superior Court.

28 ///

1 136. As a further and proximate legal result of the unlawful conduct of Defendants herein above  
2 alleged, Plaintiff has suffered loss of earnings, including not being able to work for numerous days  
3 and/or weeks due to the stress caused by defendant's wrongful acts, in an amount according to proof and  
4 well in excess of the minimum jurisdiction of the Superior Court.

5 137. The conduct of each Defendant, as herein above alleged, was done intentionally and with  
6 malice, fraud, and/or oppression, and with reckless indifference to and disregard for Plaintiff's rights  
7 and welfare, so that Plaintiff is entitled to an award of punitive damages against all Defendants. All of  
8 such conduct by Defendants was approved, authorized, ratified, and/or carried out at the direction and  
9 with the knowledge, consent, and acquiescence of Defendants' management-level employees or agents.

10  
11 **SEVENTH CAUSE OF ACTION**

12 **FOR INVASION OF PRIVACY - FALSE LIGHT**

13 **(Against Defendants FOSTER FARMS, CARRENO, SIMPSON and DOES 51 through 100)**

14 138. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each  
15 And every allegation contained in each of the above paragraphs by this reference as though  
16 set forth in full herein.

17 139. Plaintiff is informed and believes Defendant SIMPSON and Defendant FOSTER FARMS,  
18 CARRENO, and DOES 51 through 100, and each of them, by the herein-described acts, conspired to,  
19 and in fact, did negligently, recklessly, and intentionally place the Plaintiff in a false light in the public  
20 eye. Specifically, Defendant SIMPSON and Defendant FOSTER FARMS, CARRENO, and DOES 51  
21 through 100, and each of them, caused excessive and unsolicited postings of and concerning Plaintiff,  
22 which placed Plaintiff in a false light to a large number of third persons and to the general public in the  
23 community.

24 140. Defendants CARRENO, SIMPSON, FOSTER FARMS, and DOES 51 through 100, knew or  
25 should have known that the false posting of Plaintiff as a homosexual male, recently divorced, seeking  
26 sex with men, and had to move because his home was in foreclosure, would be communicated to the  
27 public in general, and to a large number of persons, since the postings were placed on a website that is  
28 accessible by virtually anyone in the Bakersfield community, in the nation, and in the entire world. Due

1 to the expansive nature of the World Wide Web, there is not simply a likelihood, but there is certitude  
2 that a large number of persons did in fact access the fraudulent postings, thereby placing Plaintiff in  
3 false light.

4 141. Plaintiff is informed and believes Defendant SIMPSON and Defendant FOSTER FARMS,  
5 CARRENO, and DOES 51 through 100, and each of them, by the herein-described acts, conspired to,  
6 and in fact, did negligently, recklessly, and intentionally cause excessive and unsolicited postings  
7 placing Plaintiff in a false light to a large number of third persons and to the general community that was  
8 an unfair, false and inaccurate depiction of Plaintiff since Plaintiff was not a homosexual male, was not  
9 a closeted homosexual and was not seeking to have random homosexual men contact him seeking sexual  
10 encounters, which is exactly what happened to the Plaintiff as a result of the Defendants' postings. At  
11 all relevant times at issue herein, Plaintiff was a married heterosexual man with two young daughters.  
12 The posts were further false because Plaintiff was not moving due to foreclosure.

13 142. Plaintiff is informed and believes Defendants CARRENO, SIMPSON and FOSTER FARMS,  
14 and DOES 51 through 100, and each of them, by the herein-described acts, conspired to, and in fact, did  
15 negligently, recklessly, and intentionally cause excessive and unsolicited internal and external postings  
16 placing Plaintiff in a false light to a large number of third persons and to the general community. The  
17 postings themselves were highly offensive to a reasonable person because they falsely portrayed  
18 plaintiff, a married heterosexual man with two children, as a recently divorced and formerly closeted  
19 homosexual seeking homosexual encounters with anonymous men, and one of the ads was accompanied  
20 by an obscene and sexually explicit photograph, accompanied with the subject lines, "*seeking a hot stud*  
21 *for first timer - m4m ...*" and "*A Hard Man is Good to Find - m4m.*" Moreover, the false posts placed  
22 by the Defendants, and each of them, disclosed Plaintiff's private information including his name, and  
23 home telephone and work cell phone numbers to the general public and to large numbers of persons,  
24 thereby inviting large numbers of anonymous homosexual men to directly contact plaintiff and his  
25 family with sexually explicit and offensive propositions, which in fact occurred. Further, the  
26 Defendant falsely posted that Plaintiff was moving because his house was foreclosed, subjecting  
27 Plaintiff to the false impression that he was in financial distress. (See Exhibit 17 attached hereto and  
28 incorporated herein by this reference.) Further, Plaintiff is informed and believes that Defendants

1 FOSTER FARMS and its manager and supervisor CARRENO and SIMPSON acted with knowledge of  
2 the falsity of the posts, but intended to cause Plaintiff great harm, injury, distress and embarrassment  
3 from the posts.

4 143. Although Plaintiff is a private person and thus not required to demonstrate that defendants acted  
5 with malice, nonetheless Defendant SIMPSON and Defendant FOSTER FARMS, CARRENO, and  
6 DOES 51 through 100, and each of them, by and through their managing agents and officers committed  
7 the acts alleged herein recklessly, maliciously, fraudulently, and oppressively, with the wrongful  
8 intention of injuring Plaintiff, for an improper and evil motive amounting to malice (as described  
9 above), and which abused and/or prevented the existence of any conditional privilege, which in fact did  
10 not exist, and with a reckless and conscious disregard of Plaintiff's rights. All actions of Defendants,  
11 and each of them, their agents, employees, supervisors, managing agents and officers as herein alleged  
12 were known, authorized, ratified and approved by the Defendants FOSTER FARMS, Defendant  
13 Employer and DOES 51 through 100, and each of them.

14 144. As a proximate result of the post and re-post of these defamatory statements by Defendants, and  
15 each of them, Plaintiff has suffered injury to his personal, business and professional reputation including  
16 suffering embarrassment, humiliation, severe emotional distress, shunning, anguish, fear, loss of  
17 employment promotions, and employability, and significant economic loss and special damages in the  
18 form of medical expenses, lost wages and lost future earnings, all to Plaintiff's economic, emotional,  
19 and general damage in an amount according to proof.

20  
21 **EIGHTH CAUSE OF ACTION**

22 **FOR INVASION OF PRIVACY – INTRUSION**

23 **(Against Defendants FOSTER FARMS, CARRENO, SIMPSON and DOES 51 through 100)**

24 145. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each  
25 and every allegation contained in each of the above paragraphs by this reference as though  
26 set forth in full herein.

27 146. Plaintiff is informed and believes that Defendants SIMPSON, FOSTER FARMS, CARRENO  
28 and DOES 51 through 100, inclusive, intentionally and without consent intruded into the private and

1 confidential information of Plaintiff by obtaining personal and confidential information about the  
2 Plaintiff from his private and confidential FOSTER FARMS employment records. Said private and  
3 confidential information included Plaintiff's name, home address, and telephone numbers, among other  
4 things. Defendants FOSTER FARMS and CARRENO then, without consent and against Plaintiff's  
5 will, intentionally disclosed the private and confidential information about Plaintiff to Defendant  
6 SIMPSON. Defendant SIMPSON, a FOSTER FARMS supervisor acting with the knowledge and  
7 consent of FOSTER FARMS and CARRENO, then disclosed Plaintiff's private and confidential  
8 information in a manner highly offensive to any reasonable person. Specifically, Defendant  
9 SIMPSON impersonated the Plaintiff and opened a Craigslist account, posed as the Plaintiff on  
10 Defendant CRAIGSLIST's website and, in a highly offensive manner, falsely stated on an open  
11 Craigslist ad that Plaintiff was homosexual and interested in random sexual encounters with men. As  
12 part of the ads, Defendant SIMPSON disclosed Plaintiff's private information including Plaintiff's  
13 private home telephone number and cell phone number and invited homosexual men seeking random  
14 sex to call the Plaintiff, which they did. Defendants FOSTER FARMS, CARRENO and SIMPSON  
15 also disclosed Plaintiff's private information including Plaintiff's home address in relation to  
16 advertisements inviting strangers to go to Plaintiff's private home and pick up free property there. As a  
17 result of the conduct of Defendants, and each of them, dozens of strangers responding to the ads placed  
18 on Craigslist by the Defendants did in fact physically go to Plaintiff's home to obtain free property.  
19 147. Plaintiff had an objectively reasonable expectation that his personal, private and confidential  
20 information including his name, home address and telephone numbers, which were held by his employer  
21 Defendant FOSTER FARMS, would remain private and confidential and would not be disclosed without  
22 Plaintiff's consent to an individual such as Defendant SIMPSON, who Defendants FOSTER FARMS  
23 and CARRENO knew, or in the exercise of reasonable care, should have known, had a history of  
24 misconduct and harassment toward subordinate employees and who Defendants FOSTER FARMS and  
25 CARRENO knew was an unfit employee and posed a risk to subordinate employees such as the  
26 Plaintiff. Plaintiff had a further objectively reasonable expectation that his personal and private  
27 information including his name, home address and telephone numbers, which were held by his employer  
28 Defendant FOSTER FARMS, would remain private and confidential and would not be disclosed without

1 Plaintiff's consent in connection with ads seeking homosexual encounters, ads offering free property,  
2 and would not be disclosed in any other manner without his consent. All such disclosures of Plaintiff's  
3 private and confidential information were carried out without Plaintiff's consent and were done  
4 intentionally by the Defendants in a manner designed to cause intrusion into Plaintiff's privacy at his  
5 home and with his family.

6 148. Defendants' conduct legally and proximately caused Plaintiff harm, emotional distress and  
7 injury. Defendants intentional conduct in improperly accessing Plaintiff's personal information, and  
8 disclosing it without consent to Defendant SIMPSON and to the public on Craigslist, did in fact cause an  
9 invasion of Plaintiff's privacy, solitude, private affairs and concerns, when many strangers responding to  
10 the ads called Plaintiff's home and cell telephone numbers seeking homosexual sexual encounters, and  
11 when approximately 50 to 60 strangers responding to the ads for free property personally appeared at  
12 Plaintiff's private home seeking valuable property that had been offered for free on Craigslist.

13 149. Defendants FOSTER FARMS and CARRENO knew or should have known that Defendant  
14 SIMPSON had a history of harassment of other employees and was unfit to be given access to the  
15 personal and confidential information of its employees including the Plaintiff. Accordingly, Defendant  
16 FOSTER FARMS and CARRENO knew or should have known that providing Defendant SIMPSON  
17 with access to Plaintiff's personal private and confidential information including Plaintiff's telephone  
18 numbers and home address would constitute an intentional intrusion into Plaintiff's Private employment  
19 information in a highly offensive manner, in violation of Plaintiff's right of privacy. Defendants  
20 FOSTER FARMS, CARRENO, and SIMPSON knew or should have known that disclosing on the  
21 internet Plaintiff's private and confidential information related to his name, home address and telephone  
22 numbers taken from private and confidential employment files together with ads for random homosexual  
23 encounters was highly offensive to a reasonable person and would cause substantial injury and harm to  
24 the Plaintiff. In addition, Defendants FOSTER FARMS, CARRENO and SIMPSON knew or should  
25 have known that additional postings that claimed Plaintiff was offering furniture, appliances, and other  
26 valuable items (e.g. a vehicle) for free or at very low prices would reasonably create undesired intrusion  
27 by unknown individual Craigslist users into the privacy of Plaintiff's home by making unwanted phone  
28 calls and unnecessarily showing up at Plaintiff's private home.



1 150. As a direct, proximate, and legal result of the aforementioned acts of the Defendants, and each of  
2 them, Plaintiff has suffered severe humiliation, mental anguish, and emotional and physical distress, and  
3 has been injured in mind and body including shock to the nervous system, severe emotional distress,  
4 physical illness, all to the Plaintiff's general damages in an amount according to proof at trial and well  
5 within the jurisdiction of the Superior Court. As a direct, proximate and legal result of the  
6 aforementioned acts of the Defendants, and each of them, Plaintiff has suffered special damages in an  
7 amount according to proof at trial and within the jurisdiction of the Superior Court. Further, Plaintiff is  
8 entitled and hereby seeks double and treble damages under Penal Code section 637.2(a) and other  
9 applicable law, according to proof.

10 151. Defendants SIMPSON, FOSTER FARMS, CARRENO and DOES 51 through 100, and each of  
11 them, by and through their managing agents and officers committed the acts alleged herein recklessly,  
12 maliciously, fraudulently, and oppressively, with the wrongful intention of injuring Plaintiff, for an  
13 improper and evil motive amounting to malice (as described above), and which abused and/or prevented  
14 the existence of any conditional privilege, which in fact did not exist, and with a reckless and conscious  
15 disregard of Plaintiff's rights. All actions of Defendants, and each of them, their agents, employees,  
16 managing agents and officers as herein alleged were known, authorized, ratified and approved by the  
17 Defendants SIMPSON and Defendants FOSTER FARMS, and CARRENO, and DOES 51 through 100,  
18 and each of them. Plaintiff thus is entitled to recover punitive and exemplary damages from Defendants,  
19 and each of them, for these wanton, willful, intentionally invasive, egregious and despicable acts in an  
20 amount based on the wealth and ability to pay according to proof at the time of trial.

21 152. The aforementioned acts of defendants were willful, wanton, malicious, oppressive, and  
22 were carried out with a conscious disregard for the Plaintiff's right and safety and thereby justify an  
23 award of punitive damages in an amount according to proof at trial.

24 153. As a further and proximate legal result for the unlawful, harassing and discriminatory  
25 conduct of the defendants, and each of them, herein above alleged, Plaintiff has incurred, and will incur,  
26 special damages in the form of health care expenses, and additional fees in prosecution of this action in  
27 an amount according to proof and well in excess of the minimum jurisdiction of the Superior Court.

28 ~~///~~

1 NINTH CAUSE OF ACTION

2 **FOR INVASION OF PRIVACY – PUBLIC DISCLOSURE OF PRIVATE FACTS**

3 **(Against Defendants FOSTER FARMS, CARRRENO, SIMPSON and DOES 51 through 100)**

4 154. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each  
5 and every allegation contained in each of the above paragraphs by this reference as though  
6 set forth in full herein.

7 155. Plaintiff is informed and believes and based thereon alleges that Defendants FOSTER FARMS,  
8 CARRENO and SIMPSON, and DOES 51 through 100, publicly disclosed without consent private facts  
9 about the Plaintiff to the general public including millions of users of the Craigslist website and  
10 thousands of users of the Craigslist website in Bakersfield, California through posting ads open to the  
11 public online at [bakersfield.craigslist.org](http://bakersfield.craigslist.org).

12 156. The Defendants FOSTER FARMS, CARRENO and SIMPSON, and DOES 51 through 100,  
13 publicly disclosed private facts about the Plaintiff on the craigslist website. The private facts publicly  
14 disclosed by the Defendants included Plaintiff's name, private home address and private home telephone  
15 number as well as his cell phone number. The Defendants FOSTER FARMS and CARRENO allowed  
16 Defendant SIMPSON to access Plaintiff's private records, without Plaintiff's consent, and the  
17 Defendants then publicly disclosed such private information to the general public, without consent.

18 157. The Defendants FOSTER FARMS, CARRENO and SIMPSON, and DOES 51 through 100,  
19 disclosed Plaintiff's private and confidential information including his name, home address and  
20 telephone numbers in a manner highly offensive to a reasonable person by impersonating the Plaintiff on  
21 the Craigslist website and posting ads blatantly seeking homosexual encounters for the Plaintiff with  
22 random men and including in those ads Plaintiff's name, private home telephone number and cell phone  
23 number, inviting men seeking homosexual encounters to telephone the Plaintiff's home and cell phone  
24 for sex. Then incited people to call Plaintiff and go to Plaintiff's home for free furniture. As a legal  
25 result of Defendants' public disclosure of Plaintiff's private information, men did in fact telephone the  
26 Plaintiff's home at all hours of the day and night seeking sexual encounters using often highly offensive  
27 and vile language and other to Plaintiff's home seeking property to buy or take away free. The repeated  
28 telephone calls at all hours of the day and night to the Plaintiff from men seeking gay sex from the

1 Plaintiff were highly offensive and objectionable to the Plaintiff and his family and would be offensive  
2 and objectionable to a reasonable person of ordinary sensibilities.

3 158. The private facts about the Plaintiff that were disclosed by the Defendants, and each of them,  
4 were not newsworthy. Plaintiff is not a public figure.

5 159. As a direct, proximate, and legal result of the aforementioned acts, Plaintiff has suffered  
6 severe humiliation, mental anguish, and emotional and physical distress, and has been injured in mind  
7 and body including shock to the nervous system, severe emotional distress, physical illness, all to the  
8 Plaintiff's general damages in an amount according to proof at trial and well within the jurisdiction of  
9 the Superior Court.

10 160. Defendants SIMPSON, FOSTER FARMS, CARRENO and DOES 51 through 100, and each of  
11 them, by and through their managing agents and officers committed the acts alleged herein recklessly,  
12 maliciously, fraudulently, and oppressively, with the wrongful intention of injuring Plaintiff, for an  
13 improper and evil motive amounting to malice (as described above), and which abused and/or prevented  
14 the existence of any conditional privilege, which in fact did not exist, and with a reckless and conscious  
15 disregard of Plaintiff's rights. All actions of Defendants, and each of them, their agents, employees,  
16 managing agents and officers as herein alleged were known, authorized, ratified and approved by the  
17 Defendants SIMPSON and Defendant FOSTER FARMS, Defendant Employer, Defendant CARRENO  
18 and DOES 51 through 100, and each of them. Plaintiff thus is entitled to recover punitive and  
19 exemplary damages from Defendants, and each of them, for these wanton, obnoxious, and despicable  
20 acts in an amount based on the wealth and ability to pay according to proof at the time of trial.

21 161. The aforementioned acts of defendants were willful, wanton, malicious, and oppressive, and  
22 were carried out with a conscious disregard for the Plaintiff's rights and thereby justify an award of  
23 punitive damages in an amount according to proof at trial.

24 162. As a further and proximate legal result for the unlawful, harassing and discriminatory  
25 conduct of the defendants, and each of them, herein above alleged, Plaintiff has incurred, and will incur,  
26 costs, expenses and attorneys fees in prosecution of this action in an amount according to proof and well  
27 in excess of the minimum jurisdiction of the Superior Court.

28 ///

TENTH CAUSE OF ACTION

**FOR INVASION OF PRIVACY - MISAPPROPRIATION OF NAME**

**(Against Defendants FOSTER FARMS, CARRENO, SIMPSON and DOES 51 through 100)**

163. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each and every allegation contained in each of the above paragraphs by this reference as though set forth in full herein.

164. Plaintiff is informed and believes that Defendant SIMPSON misappropriated Plaintiff's name and identity by using identifying information that is specific and particular to Plaintiff, without Plaintiff's consent, to the distinct advantage of Defendants SIMPSON, FOSTER FARMS, CARRENO and DOES 51 through 100, inclusive. The identifying information used was Plaintiff's name, private home addresses, private home telephone number and cell phone number, resulting in severe emotional damage to Plaintiff. Defendants' use of his identifying information was non-consensual as Plaintiff never gave verbal or written permission for Defendants to use Plaintiff's name and personal information to solicit homosexuals and/or potential buyers and takers for various personal items, and was in fact opposed to such highly offensive conduct.

165. Defendants SIMPSON, FOSTER FARMS, CARRENO and DOES 51 through 100, inclusive, gained an advantage from the misappropriation of Plaintiff's likeness by causing severe harm and emotional distress in Plaintiff and thereby impeding Plaintiff's ability to work and further causing Plaintiff to want to resign from his position with FOSTER FARMS. The ultimate goal of Defendants SIMPSON, FOSTER FARMS, CARRENO and DOES 51 through 100, inclusive, was to force Plaintiff to resign his position after reporting that jobs at FOSTER FARMS were being offered to non-union workers rather than union workers.

166. As a direct, proximate, and legal result of the aforementioned acts, Plaintiff has suffered severe humiliation, mental anguish, and emotional and physical distress, and has been injured in mind and body including shock to the nervous system, severe emotional distress, physical illness, all to the Plaintiff's general damages in an amount according to proof at trial and well within the jurisdiction of the Superior Court.

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1 167. Defendants SIMPSON, FOSTER FARMS, CARRENO and DOES 51 through 100, and each of  
2 them, by and through their managing agents and officers committed the acts alleged herein recklessly,  
3 maliciously, fraudulently, and oppressively, with the wrongful intention of injuring Plaintiff, for an  
4 improper and evil motive amounting to malice (as described above), and which abused and/or prevented  
5 the existence of any conditional privilege, which in fact did not exist, and with a reckless and conscious  
6 disregard of Plaintiff's rights. All actions of Defendants, and each of them, their agents, employees,  
7 managing agents and officers as herein alleged were known, authorized, ratified and approved by the  
8 Defendants SIMPSON and Defendant FOSTER FARMS, Defendant Employer, Defendant CARRENO  
9 and DOES 51 through 100, and each of them. Plaintiff thus is entitled to recover punitive and  
10 exemplary damages from Defendants, and each of them, for these wanton, obnoxious, and despicable  
11 acts in an amount based on the wealth and ability to pay according to proof at the time of trial.

12 168. The aforementioned acts of defendants were willful, wanton, malicious, and oppressive, and  
13 were carried out with a conscious disregard for the Plaintiff's rights and thereby justify an award of  
14 punitive damages in an amount according to proof at trial.

15 169. As a further and proximate legal result for the unlawful, harassing and discriminatory  
16 conduct of the defendants, and each of them, herein above alleged, Plaintiff has incurred, and will incur,  
17 costs, expenses and attorneys fees in prosecution of this action in an amount according to proof and well  
18 in excess of the minimum jurisdiction of the Superior Court.

19 **ELEVENTH CAUSE OF ACTION**

20 **FOR PRIVATE NUISANCE**

21 **(Against Defendants FOSTER FARMS, CARRENO, SIMPSON and DOES 51 through 100)**

22 170. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each and  
23 every allegation contained in each of the above paragraphs by this reference as though set forth in full  
24 herein.

25 171. Plaintiff is, and at all times herein mentioned was, the owner and in possession and control of  
26 certain real property consisting of land and a single family house located at 4204 Danube Court,  
27 Bakersfield, California 93308, Kern County.

28 ///

1 172. Defendant FOSTER FARMS, through its agents and supervisors including Defendant  
2 CARRENO and Defendant SIMPSON, intentionally and recklessly posted advertisements on  
3 CRAIGSLIST, including those mentioned herein, purportedly selling items that belonged to Plaintiff  
4 and directing all potential customers to arrive at Plaintiff's house in Bakersfield, California 93308, the  
5 specific address of Plaintiff's home was disclosed, and also contact Plaintiff at his home telephone  
6 number. Due to the postings on CRAIGSLIST a large number of individuals arrived at Plaintiff's house  
7 seeking to purchase items that Defendant SIMPSON had posted for sale on CRAIGSLIST. The  
8 numerous people who went to Plaintiff's home caused severe interference with Plaintiff's ability to  
9 enjoy his property as he was repeatedly required to address these individuals and explain to them that  
10 the various items they sought from him were not for sale. Plaintiff's enjoyment of his property was  
11 interrupted by at least sixty separate people throughout the course of several days. Moreover, Plaintiff  
12 received numerous telephone calls on his home telephone number by individuals inquiring about the  
13 homosexual advertisements posted on CRAIGSLIST by Defendant SIMPSON.

14 173. As a result of the CRAIGSLIST postings, Defendants, and each of them, caused Plaintiff to lose  
15 the use and enjoyment of his house in that on several occasions dozens of individuals went to Plaintiff's  
16 house seeking the valuable property offered for sale and for free, disturbing Plaintiff's use and  
17 enjoyment of his home, and callers repeatedly phoned Plaintiff's house to inquire about the  
18 CRAIGSLIST postings, further disturbing Plaintiff's use and enjoyment of his property.

19 174. The aforementioned conduct of Defendants constituted a private nuisance within the meaning of  
20 *Civil Code* Section 3479 in that it caused an obstruction to the free use of Plaintiff's property, so as to  
21 interfere with his comfortable enjoyment of property.

22 175. As a proximate result of the nuisance created by the defendants, and each of them, Plaintiff has  
23 been damaged in an amount according to proof at trial and well within the jurisdiction of the Superior  
24 Court.

25 176. In maintaining the nuisance, Defendants, and each of them, are acting with full knowledge of the  
26 consequences and damage being caused to Plaintiff, and their conduct was willful, oppressive and  
27 malicious; accordingly, Plaintiff is entitled to punitive damages against defendants, and each of them in  
28 an amount according to proof at trial and well within the jurisdiction of the Superior Court.

1 TWELFTH CAUSE OF ACTION

2 **FOR DISABILITY DISCRIMINATION**

3 **(California Government Code § 12940, et seq.)**

4 **(Against Defendants FOSTER FARMS, CARRENO, and DOES 51-100)**

5 177. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each and  
6 every allegation contained in each of the above paragraphs by this reference as though set forth in full  
7 herein.

8 178. Plaintiff is, and at all times herein mentioned was, diagnosed with a medical condition based on  
9 anxiety and depression fulfilling the definition of a “medical condition” as required to be regarded as  
10 Plaintiff having a physical disability under California Government Code §§ 12940(a), 12926(h).

11 179. Defendants FOSTER FARMS, CARRENO, and DOES 51-100, and each of them, are considered  
12 to be a covered employer for physical disability discrimination claims under the California Fair  
13 Employment and Housing Act (“FEHA”), as an employer who regularly employs five or more persons.  
14 Cal. Gov’t Code § 12926(d).

15 180. Defendants FOSTER FARMS, CARRENO, and DOES 51-100, and each of them, discriminated  
16 against Plaintiff because of his physical disability and did not make reasonable accommodations to  
17 allow Plaintiff to return to work as required by California Government Code § 12926(m).

18 181. Defendants FOSTER FARMS, CARRENO, and DOES 51-100, and each of them, denied  
19 Plaintiff reasonable accommodation, from approximately January 4, 2008 to February 20, 2008, by not  
20 allowing Plaintiff to return to his position as Route Relief Driver/Loader, on modified work. In fact,  
21 Defendants FOSTER FARMS, CARRENO and DOES 51-100, and each of them, did not allow Plaintiff  
22 to return to work at all until the doctor released Plaintiff of all restrictions on February 20, 2008.

23 182. Plaintiff was, and at all times mentioned herein, able to successfully accomplish his job duties  
24 with reasonable accommodations, despite the remaining doctor’s restrictions until February 20, 2008.

25 183. Defendants FOSTER FARMS, CARRENO, and DOES 51-100, and each of them, were, at all  
26 times mentioned herein, fully aware of Plaintiff’s physical disability, and failed to properly provide  
27 Plaintiff with reasonable accommodations with respect to his physical disability. That is, Defendants

28 ///

1 knew that Plaintiff's medical restrictions would not be lifted until February 20, 2008, and Plaintiff was  
2 thus not allowed to return to his job until after that date.

3 184. Defendants FOSTER FARMS, CARRENO, and DOES 51-100, and each of them, discriminated  
4 against Plaintiff by committing the things, acts, and commissions herein alleged. In discriminating  
5 against Plaintiff on account of his physical disability, Defendants violated California Government Code  
6 § 12940, *et seq.*

7 185. As a direct and proximate result of the conduct of Defendants FOSTER FARMS, CARRENO,  
8 and DOES 51-100, and each of them, Plaintiff has suffered emotional anguish and distress, loss of  
9 income and benefits, and other special and general damages in an amount to be proven at trial.

10 186. Further, Plaintiff has suffered the loss of income as a result of Defendants' refusal for Plaintiff to  
11 return to work during the time alleged herein when Plaintiff was fully capable of performing his duties.

12 187. Plaintiff herein exhausted his administrative remedies as required under California Government  
13 Code § 12960, wherein the Plaintiff filed a discrimination charge with the California Department of Fair  
14 Employment and Housing ("DFEH"), as well as the U.S. Equal Employment Opportunity Commission  
15 ("EEOC"). Plaintiff subsequently received the necessary "Right-to-Sue" Letters from DFEH and  
16 EEOC, and hereafter timely files this complaint.

17  
18 **THIRTEENTH CAUSE OF ACTION**

19 **FOR CONSTRUCTIVE DISCHARGE**

20 **(Against Defendants FOSTER FARMS, CARRENO and DOES 51-100)**

21 188. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each and  
22 every allegation contained in each of the above paragraphs by this reference as though set forth in full  
23 herein.

24 189. At all times relevant herein, from approximately August of 2001 until January of 2010, a period  
25 of over eight years, Plaintiff was employed by Defendant FOSTER FARMS.

26 190. Plaintiff is informed and believes, and hereon alleges, that Defendant FOSTER FARMS  
27 promised, by words and/or conduct, to discharge Plaintiff only for good cause.

28 ///



1 191. Plaintiff substantially performed his job duties at FOSTER FARMS during the course of his  
2 employment there.

3 192. Defendants FOSTER FARMS, CARRENO and SIMPSON and DOES 1 through 51,  
4 intentionally created and/or knowingly permitted working conditions to exist that were so intolerable  
5 that a reasonable person in the position of Plaintiff would have had no reasonable alternative except to  
6 resign, including but not limited to permitting the intolerable condition of working in a hostile  
7 environment where Plaintiff was subjected to harassment from Defendant FOSTER FARMS and its  
8 employees, and permitting ongoing retaliation after Plaintiff voiced his complaint that FOSTER  
9 FARMS's denial of the new sales route to Plaintiff was unfair to Plaintiff and others.

10 193. On or about February 8, 2010, after enduring Defendants' ongoing harassment, retaliation, and  
11 other extreme abuse, Plaintiff was forced to resign and was in fact constructively terminated from his  
12 employment with FOSTER FARMS. The working conditions to which Plaintiff was subjected at  
13 Defendant FOSTER FARMS caused him great physical and emotional harm and were harmful to his  
14 mental health. Plaintiff could not continue working there without suffering further injury to his mind  
15 and body, all to his general and special damages.

16 194. As a legal result of the loss of his employment at FOSTER FARMS, Plaintiff was harmed,  
17 including losing income, promotions, and benefits, and has been forced to seek other employment  
18 opportunities.

19 **FOURTEENTH CAUSE OF ACTION**

20 **FOR DEFAMATION**

21 **(Against Defendants FOSTER FARMS, CARRENO, SIMPSON and DOES 51 through 100)**

22 195. Plaintiff incorporates herein all previous paragraphs, and repeats and re-alleges each and  
23 every allegation contained in each of the above paragraphs by this reference as though set forth in full  
24 herein.

25 196. Plaintiff is informed and believes Defendants FOSTER FARMS, through its agents and  
26 supervisors including but not limited to CARRENO, SIMPSON and DOES 51 through 100, and each of  
27 them, by the herein-described acts, conspired to, and in fact, did negligently, recklessly, and  
28 intentionally cause excessive and unsolicited internal and external publications of defamation, of and

1 concerning Plaintiff, to third persons and to the community. These false and defamatory statements  
2 included express and implied statements of personal information regarding the following: Plaintiff's  
3 sexuality, criticisms of Plaintiff's job performance, accusations that Plaintiff was a poor performer, was  
4 incompetent, failed to perform his duties, was not doing his job, was not appropriately handling and  
5 providing service for his customers, was a troublemaker and baseless complainer, and was lacking in  
6 skill, professionalism, competence and dedication, among other things.

7 197. The precise dates of these publications were numerous and continuing, starting in or about  
8 January 1, 2006, and continuing through and including April, 2009, for the improper and malicious  
9 purpose of retaliating against Plaintiff after Plaintiff voiced concerns about misconduct by Defendant  
10 FOSTER FARMS including but not limited to denial of the new sales route to Plaintiff was unfair to  
11 Plaintiff and others. These publications were outrageous, negligent, reckless, intentional, and  
12 maliciously published and republished by Defendants, and each of them. Plaintiff is informed and  
13 believes that the negligent, reckless, and intentional publications by Defendants, and each of them, were  
14 and continue to be, foreseeably published and republished by Defendants, their agents and employees,  
15 and recipients in the community. Plaintiff hereby seeks damages for these publications and all  
16 foreseeable republications discovered up to the time of trial, including those republications Plaintiff  
17 himself was forced and compelled to publish.

18 198. During the above-described time-frame, Defendants, and each of them, conspired to, and in fact,  
19 did negligently, recklessly, and intentionally cause excessive and unsolicited publication of defamation,  
20 of and concerning Plaintiff, to third persons, who had no need or desire to know. Those third persons(s)  
21 to whom these Defendants published this defamation are believed to include, but are not limited to, other  
22 agents and employees of Defendants, and each of them, and the community, all of whom are known to  
23 Defendants, and each of them, but unknown at this time to Plaintiff.

24 199. The defamatory publications consisted of oral and written, knowingly false and unprivileged  
25 communications, tending directly to injure Plaintiff and Plaintiff's personal, business, and professional  
26 reputation. These publications, which were reflected in various forms, including but not limited to  
27 Plaintiff's employment records and internet postings, included the following false and defamatory  
28 statements (in violation of Civil Code §§ 45 and 46(3)(5)) with the meaning and/or substance that

1 Plaintiff: was incompetent; was a poor performer; was unprofessional and careless and neglectful with  
2 his work responsibilities and duties; was a troublemaker; was a complainer; harmed the interests of his  
3 customers; and was homosexual looking for sexual partners over the internet. These and similar  
4 statements were published by Defendants, and each of them, and expressly and impliedly asserted that  
5 Plaintiff was incompetent, unfit for his position, a poor employee, and that his denial of the sales route  
6 and other mistreatment at work was justified.

7 200. Plaintiff is informed, believes and fears that these false and defamatory per se statements will  
8 continue to be published by Defendants, and each of them, and will be foreseeably republished by their  
9 recipients, all to the ongoing harm and injury to Plaintiff's business, professional, and personal  
10 reputations. Plaintiff also seeks redress in this action for all foreseeable republications, including his  
11 own compelled self-publication of these defamatory statements.

12 201. The defamatory meaning of all of the above-described false and defamatory statements and their  
13 reference to Plaintiff, were understood by these above-referenced third person recipients and other  
14 members of the community who are known to Defendants, and each of them, but unknown to Plaintiff at  
15 this time.

16 202. None of Defendants' defamatory publications against Plaintiff referenced above were true.

17 203. The above defamatory statements were understood as assertions of fact, and not as opinion.  
18 Plaintiff is informed and believes this defamation will continue to be negligently, recklessly, and  
19 intentionally published and foreseeably republished by Defendants, and each of them, and foreseeably  
20 republished by recipients of Defendants' publications, thereby causing additional injury and damages for  
21 which Plaintiff seeks redress by this action.

22 204. Each of these false defamatory per se publications (as set forth above) were negligently,  
23 recklessly, and intentionally published in a manner equaling malice. These publications abused any  
24 alleged conditional privilege (which Plaintiff denies existed). All of the publications were made with  
25 hatred, ill will, and an intent to vex, harass, annoy, and injure Plaintiff. These publications were made in  
26 order to justify Defendants' illegal, cruel and unjustified retaliation against Plaintiff including but not  
27 limited to the CRAIGSLIST postings. These false and defamatory statements were made to cause  
28 further damage to Plaintiff's professional and personal reputation, to cause him to lose promotional or

1 career enhancement opportunities, to lose respect and standing in his career, to falsely justify his career  
2 stonewalling, and to avoid paying Plaintiff the significant bonuses and salary increases he had earned.  
3 These publications were the result of prior ill will, rivalry, and disputes and in order to justify the  
4 improper purpose of retaliating against Plaintiff in violation of law and public policy.

5 205. Each of these publications by Defendants, and each of them, were made with knowledge that no  
6 investigation supported the unsubstantiated and obviously false statements. The Defendants, published  
7 these statements knowing them to be false, unsubstantiated by any reasonable investigation and the  
8 product of hostile witnesses. These acts of publication were known by Defendants, and each of them, to  
9 be negligent to such a degree as to be reckless. In fact, not only did Defendants, and each of them, have  
10 no reasonable basis to believe these statements, but they also had no belief in the truth of these  
11 statements, and in fact knew the statements to be false. Defendants, and each of them, excessively,  
12 negligently, and recklessly published these statements to individuals with no need to know, and who  
13 made no inquiry, and who had a mere general or idle curiosity of this information.

14 206. The above complained-of publications by Defendants, and each of them, were made with hatred  
15 and ill will towards Plaintiff and the design and intent to injure Plaintiff, Plaintiff's good name, his  
16 reputation, employment and employability. Defendants, and each of them, published these statements,  
17 not with the intent to protect any interest intended to be protected by any privilege, but with negligence,  
18 recklessness and/or an intent to injure Plaintiff and destroy his reputation. Therefore, no privilege  
19 existed to protect any of the Defendants from liability for any of these aforementioned publications or  
20 republications.

21 207. As a proximate result of the publication and republication of these defamatory statements by  
22 Defendants, and each of them, Plaintiff has suffered injury to his personal, business and professional  
23 reputation including suffering embarrassment, humiliation, severe emotional distress, shunning, anguish,  
24 fear, loss of employment promotions, and employability, and significant economic loss in the form of  
25 lost wages and future earnings, all to Plaintiff's economic, emotional, and general damage in an amount  
26 according to proof.

27 208. Defendants FOSTER FARMS, CARRENO, SIMPSON, and DOES 51 through 100, and each of  
28 them, by and through their managing agents and officers committed the acts alleged herein recklessly,

1 maliciously, fraudulently, and oppressively, with the wrongful intention of injuring Plaintiff, for an  
2 improper and evil motive amounting to malice (as described above), and which abused and/or prevented  
3 the existence of any conditional privilege, which in fact did not exist, and with a reckless and conscious  
4 disregard of Plaintiff's rights. All actions of Defendants, and each of them, their agents, employees,  
5 managing agents and officers as herein alleged were known, authorized, ratified and approved by the  
6 Defendants SIMPSON, CARRENO, FOSTER FARMS and DOES 51 through 100, and each of them.  
7 Plaintiff thus is entitled to recover punitive and exemplary damages from Defendants, and each of them,  
8 for these wanton, obnoxious, and despicable acts in an amount based on the wealth and ability to pay  
9 according to proof at the time of trial.

10  
11 **PRAYER FOR RELIEF**

12 WHEREFORE, Plaintiff herein prays for judgment appropriate to each cause of action as follows:

13  
14 **FOR FIRST CAUSE OF ACTION**

15 **BREACH OF CONTRACT - PROMISSORY ESTOPPEL**

- 16 1. General damages in an amount according to proof;
- 17 2. Medical and related expenses in an amount according to proof;
- 18 3. For a money judgment representing compensatory damages including lost past and future  
19 wages, commissions, bonuses, and all other sums of money, including employment benefits,  
20 together with interest on said amounts, and any other economic injury to Plaintiff, according  
21 to proof;
- 22 4. Attorneys fees and costs pursuant to applicable law, in an amount according to proof;
- 23 5. For all interest including but not limited to prejudgment interest provided by law including,  
24 but not limited to, California *Civil Code* § 3291 and post judgment interest;
- 25 6. For costs of suit incurred herein; and
- 26 7. For such other and further relief as the court may deem just and proper.

27 ///

1 **FOR SECOND CAUSE OF ACTION**

2 **UNFAIR COMPETITION UNDER**

3 **BUSINESS AND PROFESSIONS CODE § 17200**

- 4 1. Equitable remedies, including but not limited to injunction and temporary restraining  
5 order(s), pursuant to provisions of Business and Professions Code including section 17203,  
6 and pursuant to the equitable powers of this Court to bring Craigslist in line with other  
7 competing websites; specifically Plaintiff prays that the Court order the Defendant be  
8 preliminarily and permanently enjoined from its current posting practices of allowing users to  
9 post any ads on Craigslist without first identifying themselves; Plaintiff prays Defendant  
10 CRAIGSLIST be preliminarily and permanently ordered by the Court to implement  
11 injunctive measures requiring all Craigslist users to first identify themselves in detail,  
12 providing the following information to the Craigslist website: *i.* their full name; *ii.* a valid  
13 telephone number; *iii.* a valid residential or mailing address; *iv.* a valid identification card  
14 number such as a valid driver's license number from their state of residence or a valid credit  
15 card number; and *v.* a valid email address connected to the same user. Only after providing  
16 adequate identifying information would users then be allowed to post on the Craigslist  
17 website;
- 18 2. Pursuant to provisions of Business and Professions Code including section 17203, and  
19 pursuant to the equitable powers of this Court, Plaintiff prays that disgorgement be ordered  
20 and that defendants be ordered to restore to the general public all funds acquired by means of  
21 any act or practice declared by this Court to be unfair, unlawful or fraudulent or to constitute  
22 unfair competition under provisions of Business and Professions Code section 17200, et seq.,  
23 or untrue or misleading advertising under section 17500 et seq.;
- 24 3. For attorneys fees pursuant to Code of Civil Procedure section 1021.5 and other applicable  
25 law;
- 26 4. For costs of suit, and for such further relief as the Court may order;
- 27 5. For an award of punitive damages against any and/or all Defendants, according to proof;

28 ///

- 1 6. For all interest including but not limited to prejudgment interest provided by law including,  
2 but not limited to, California *Civil Code* section 3291 and post judgment interest; and  
3 7. For such other and further relief as the court may deem just and proper.  
4

5 **FOR THIRD CAUSE OF ACTION**

6 **HARASSMENT - HOSTILE WORK ENVIRONMENT**

- 7 1. General damages in an amount according to proof;  
8 2. Medical and related expenses in an amount according to proof;  
9 3. For a money judgment representing compensatory damages including lost past and future  
10 wages, commissions, bonuses, and all other sums of money, including employment benefits,  
11 together with interest on said amounts, and any other economic injury to Plaintiff, according  
12 to proof;  
13 4. Attorneys fees and costs pursuant to applicable law, in an amount according to proof;  
14 5. For all interest including but not limited to prejudgment interest provided by law including,  
15 but not limited to, California *Civil Code* § 3291 and post judgment interest;  
16 6. For an award of punitive damages, according to proof, against any and/or all Defendants;  
17 7. For costs of suit incurred herein; and  
18 8. For such other and further relief as the court may deem just and proper.  
19

20 **FOR FOURTH CAUSE OF ACTION**

21 **NEGLIGENT HIRING, RETENTION AND SUPERVISION**

- 22 1. General damages in an amount according to proof;  
23 2. Medical and related expenses in an amount according to proof;  
24 3. For a money judgment representing compensatory damages including lost past and future  
25 wages, commissions, bonuses, and all other sums of money, including employment benefits,  
26 together with interest on said amounts, and any other economic injury to Plaintiff, according  
27 to proof;  
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- 1 4. For all interest including but not limited to prejudgment interest provided by law including,  
2 but not limited to, California *Civil Code* § 3291 and post judgment interest;  
3 5. For attorneys fees and costs pursuant to applicable law; and  
4 6. For such other and further relief as the court may deem just and proper.  
5

6 **FOR FIFTH CAUSE OF ACTION**

7 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

- 8 1. General damages in an amount according to proof;  
9 2. Medical and related expenses in an amount according to proof;  
10 3. For an award of punitive damages, in an amount according to proof, against any and/or all  
11 Defendants;  
12 4. Attorney's fees pursuant to applicable law, in an amount according to proof;  
13 5. For costs of suit incurred herein;  
14 6. For all interest including but not limited to prejudgment interest provided by law including,  
15 but not limited to, California *Civil Code* § 3291 and post judgment interest; and  
16 7. For such other and further relief as the court may deem just and proper.  
17

18 **FOR SIXTH CAUSE OF ACTION**

19 **RETALIATION**

- 20 1. General damages in an amount according to proof;  
21 2. Medical and related expenses in an amount according to proof;  
22 3. For a money judgment representing compensatory damages including lost past and future  
23 wages, commissions, bonuses, and all other sums of money, including employment benefits,  
24 together with interest on said amounts, and any other economic injury to Plaintiff, according  
25 to proof;  
26 4. For an award of punitive damages, in an amount according to proof, against any and/or all  
27 Defendants;  
28 5. Attorneys fees pursuant to applicable law in an amount according to proof;



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6. For costs of suit incurred herein;
  7. For all interest including but not limited to prejudgment interest provided by law including, but not limited to, California *Civil Code* § 3291 and post judgment interest; and
  8. For such other and further relief as the court may deem just and proper.

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**FOR SEVENTH CAUSE OF ACTION**

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**INVASION OF PRIVACY - FALSE LIGHT**

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1. For a money judgment for loss of employability, mental pain and anguish and emotional distress, according to proof;
  2. For general, presumed and special damages based upon damage to Plaintiff's business and personal reputation;
  3. For a money judgment representing compensatory damages including lost past and future wages, commissions, bonuses, and all other sums of money, including employment benefits, together with interest on said amounts, and any other economic injury to Plaintiff, according to proof;
  4. For an award of punitive damages against any and/or all Defendant(s);
  5. For attorneys fees and costs of suit pursuant to applicable law;
  6. For prejudgment interest under Civil Code § 3288 and Code of Civil Procedure § 998, and any other applicable statutory, or contractual basis and post judgment interest;
  7. For prejudgment interest according to statute;
  8. For costs of suit according to statute; and
  9. For any other relief that is just and proper.

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**FOR EIGHTH CAUSE OF ACTION**

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**INVASION OF PRIVACY - INTRUSION**

- ///
1. For a money judgment for loss of employability, mental pain and anguish and emotional distress, according to proof;

- 1 2. For general, presumed and special damages based upon damage to Plaintiff's business and  
2 personal reputation;
- 3 3. For a money judgment representing compensatory damages including lost past and future  
4 wages, commissions, bonuses, and all other sums of money, including employment benefits,  
5 together with interest on said amounts, and any other economic injury to Plaintiff, according  
6 to proof;
- 7 4. For an award of punitive damages against any and/or all Defendant(s);
- 8 5. For costs of suit, including attorney fees under any applicable statutory or contractual basis;
- 9 6. For prejudgment interest under Civil Code § 3288 and Code of Civil Procedure § 998, and  
10 any other applicable statutory, or contractual basis and post judgment interest;
- 11 7. For prejudgment interest according to statute;
- 12 8. For costs of suit according to statute; and
- 13 9. For any other relief that is just and proper including but not limited to double and treble  
14 damages under Penal Code section 637.2(a) and other applicable law.

15  
16 **FOR NINTH CAUSE OF ACTION**

17 **INVASION OF PRIVACY – PUBLIC DISCLOSURE OF PRIVATE FACTS**

- 18 1. For a money judgment for loss of employability, mental pain and anguish and emotional  
19 distress, according to proof;
- 20 2. For general, presumed and special damages based upon damage to Plaintiff's business and  
21 personal reputation;
- 22 3. For a money judgment representing compensatory damages including lost past and future  
23 wages, commissions, bonuses, and all other sums of money, including employment benefits,  
24 together with interest on said amounts, and any other economic injury to Plaintiff, according  
25 to proof;
- 26 4. For an award of punitive damages against any and/or all Defendant(s);
- 27 5. For costs of suit, including attorney fees under any applicable statutory or contractual basis;

28 ///

6. For prejudgment interest under Civil Code § 3288 and Code of Civil Procedure § 998, and any other applicable statutory, or contractual basis and post judgment interest;
7. For prejudgment interest according to statute;
8. For costs of suit according to statute; and
9. For any other relief that is just and proper.

**FOR TENTH CAUSE OF ACTION**

**INVASION OF PRIVACY - MISAPPROPRIATION OF NAME**

1. For a money judgment for loss of employability, mental pain and anguish and emotional distress, according to proof;
2. For general, presumed and special damages based upon damage to Plaintiff's business and personal reputation;
3. For a money judgment representing compensatory damages including lost past and future wages, commissions, bonuses, and all other sums of money, including employment benefits, together with interest on said amounts, and any other economic injury to Plaintiff, according to proof;
4. For an award of punitive damages against any and/or all Defendant(s);
5. For costs of suit, including attorney fees under any applicable statutory or contractual basis;
6. For prejudgment interest under Civil Code § 3288 and Code of Civil Procedure § 998, and any other applicable statutory, or contractual basis and post judgment interest;
7. For prejudgment interest according to statute;
8. For costs of suit according to statute; and
9. For any other relief that is just and proper.

**FOR ELEVENTH CAUSE OF ACTION**

**NUISANCE**

1. For a preliminary and a permanent injunction enjoining Defendants, and each of them, and their agents, servants, and employees, and all persons acting under, in concert with, or for

1 them from posting advertisements directing persons to call Plaintiff at his home or on his cell  
2 phone or to go to Plaintiff's home address.

- 3
- 4 2. For general damages in an amount within the jurisdiction of this court;
  - 5 3. For an award of punitive damages against any and/or all Defendant(s);
  - 6 4. For attorneys fees and costs of suit under applicable law;
  - 7 5. For prejudgment interest under Civil Code § 3288 and Code of Civil Procedure § 998, and  
8 any other applicable statutory, or contractual basis and post judgment interest; and
  - 9 6. For such other and further relief as the Court may deem proper.

10 **FOR TWELFTH CAUSE OF ACTION**

11 **DISABILITY DISCRIMINATION (California Government Code § 12940, et seq.)**

- 12
- 13 1. General damages in an amount according to proof;
  - 14 2. Medical and related expenses in an amount according to proof;
  - 15 3. For a money judgment representing compensatory damages including lost past and future  
16 wages, commissions, bonuses, and all other sums of money, including employment benefits,  
17 together with interest on said amounts, and any other economic injury to Plaintiff, according  
18 to proof;
  - 19 4. For an award of punitive damages, in an amount according to proof, against any and/or all  
20 Defendants;
  - 21 5. Attorneys fees under applicable law in an amount according to proof;
  - 22 6. For costs of suit incurred herein;
  - 23 7. For all interest including but not limited to prejudgment interest provided by law including,  
24 but not limited to, California *Civil Code* § 3291 and post judgment interest; and
  - 25 8. For such other and further relief as the court may deem just and proper.

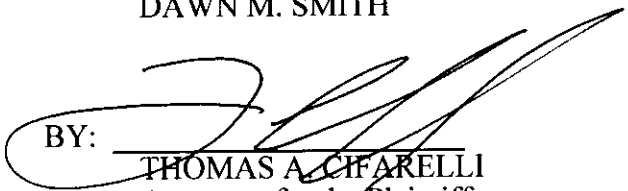
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- 6. For prejudgment interest under California *Civil Code* § 3288 and Code of Civil Procedure § 998, and any other applicable statutory, or contractual basis;
- 7. For prejudgment interest according to statute;
- 8. For costs of suit according to statute; and
- 9. For any other relief as the court may deem just and proper.

DATED: March 2, 2010

**THE CIFARELLI LAW FIRM**  
THOMAS A. CIFARELLI  
DAWN M. SMITH

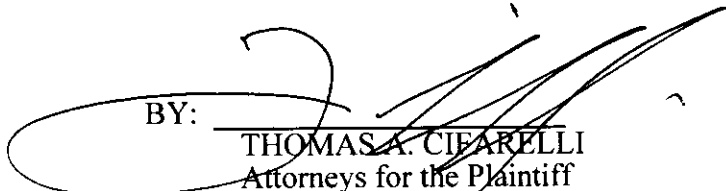
BY:   
THOMAS A. CIFARELLI  
Attorneys for the Plaintiff

**JURY TRIAL DEMANDED**

Plaintiff demands trial of all issues by jury.

Dated: March 2, 2010

**THE CIFARELLI LAW FIRM**  
THOMAS A. CIFARELLI  
DAWN M. SMITH

BY:   
THOMAS A. CIFARELLI  
Attorneys for the Plaintiff



**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

1320 EAST SHAW AVENUE, SUITE 150, FRESNO, CA 93710  
(559) 244-4760  
www.dfeh.ca.gov



February 03, 2010

P, SCOTT

**REDACTED**

RE: E200910C5103-01

P /CARRENO, ALBERT, AS AN INDIVIDUAL

Dear P SCOTT:

**NOTICE OF CASE CLOSURE**

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective February 03, 2010 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.



DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,



Geraldine Reyes  
District Administrator

cc: Case File

ALBERT CARRENO  
MANAGER  
FOSTER DAIRY FARMS  
6401 KNUDSEN DRIVE  
BAKERSFIELD, CA 93308

**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

1320 EAST SHAW AVENUE, SUITE 150, FRESNO, CA 93710  
(559) 244-4760  
www.dfeh.ca.gov



February 09, 2010

P, SCOTT

**REDACTED**

RE: E200910C5105-00

P, FOSTER DAIRY FARMS

Dear P, SCOTT:

### NOTICE OF CASE CLOSURE

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective February 09, 2010 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,



Geraldine Reyes  
District Administrator

cc: Case File

LUIS MIRANDA  
HUMAN RESOURCES  
FOSTER DAIRY FARMS  
529 KANSAS AVENUE  
MODESTO, CA 95351

**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**  
1055 West 7<sup>th</sup> Street, Suite 1400, Los Angeles, CA 90017  
(213) 439-6799 (800) 700-2320 Fax (213) 439-6796  
www.dfeh.ca.gov



October 22, 2009

SCOTT P.

**REDACTED**

**COPIY**

RE: E200910S0352-01-rc  
P /SIMPSON, MIKE, As an Individual

Dear SCOTT P. :

**NOTICE OF CASE CLOSURE**

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective September 29, 2009 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.

**REDACTED**

Notice of Case Closure  
Page Two

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,



Lottie Woodruff  
District Administrator

cc: Case File

Mike Simpson  
Supervisor  
FOSTER FARMS  
529 Kansas Ave.  
Modesto, CA 95351

**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

4800 Stockdale Hwy, Suite. 215, Bakersfield, CA 93309  
(661) 395-2729 TTY (800) 700-2320 Fax (661) 395-2972  
www.cfeh.ca.gov



June 29, 2009

SCOTT P

**REDACTED**

RE: E200809H0093-00-pev/37AA807402  
P /FOSTER FARMS DAIRY

Dear SCOTT P :

**NOTICE OF CASE CLOSURE**

The consultant assigned to handle the above-referenced discrimination complaint that was filed with the Department of Fair Employment and Housing (DFEH) has recommended that the case be closed effective June 25, 2009. Please be advised that this recommendation has been accepted.

Based upon its investigation, DFEH is unable to conclude that the information obtained establishes a violation of the statute. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this complaint.

This letter is also your Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. This is also applicable to DFEH complaints that are filed under, and allege a violation of Government Code section 12948 which incorporates Civil Code sections 51, 51.7, and 54. The civil action must be filed within one year from the date of this letter. However, if your civil complaint alleges a violation of Civil Code section 51, 51.7, or 54, you should consult an attorney about the applicable statutes of limitation. If a settlement agreement has been signed resolving the complaint, it is likely that your right to file a private lawsuit may have been waived.

**REDACTED**

Notice of Case Closure  
Page Two

In that your case is dual filed with the United States Equal Employment Opportunity Commission (EEOC), you have a right to request EEOC perform a substantial weight review of our agency's findings. To secure this review, you must request it in writing to the State and Local Coordinator at:

- 350 The Embarcadero, Suite 500, San Francisco, CA 94105, (415) 625-5600 (Northern California).
- 255 East Temple St., 4th Floor, Los Angeles, CA 90012, (213) 894-1000 (Southern California).

This request must be made within fifteen (15) days of your receipt of the letter closing your case. Pursuant to Government Code section 12965, subdivision (d)(1), your right to sue may be tolled during the pendency of EEOC's review of your complaint.

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,



Mary Bonilla  
District Administrator

cc: Case File

Michael J. Hogan  
Attorney at Law  
DOWLING AARON & KEELER  
8080 North Palm Ave 3rd floor  
Fresno, CA 93711

**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

1320 EAST SHAW AVENUE, SUITE 150, FRESNO, CA 93710  
(559) 244-4760  
www.dfeh.ca.gov



February 03, 2010

P, SCOTT

**REDACTED**

RE: E200910C5103-00

P FOSTER DAIRY FARMS

Dear P, SCOTT:

### NOTICE OF CASE CLOSURE

This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective February 03, 2010 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.



DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,



Geraldine Reyes  
District Administrator

cc: Case File

LUIS MIRANDA  
VP HUMAN RESOURCES  
FOSTER DAIRY FARMS  
529 KANSAS AVENUE  
MODESTO, CA 95351

**DEPARTMENT OF FAIR EMPLOYMENT & HOUSING**

1320 EAST SHAW AVENUE, SUITE 150, FRESNO, CA 93710

(559) 244-4760

www.dfeh.ca.gov



February 03, 2010

P SCOTT

**REDACTED**

RE: E200910C5104-00

P /FOSTER POULTRY FARMS

Dear P , SCOTT:

**NOTICE OF CASE CLOSURE**


This letter informs that the above-referenced complaint that was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective February 03, 2010 because an immediate right-to-sue notice was requested. DFEH will take no further action on the complaint.

This letter is also the Right-To-Sue Notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

If a federal notice of Right-To-Sue is wanted, the U.S. Equal Employment Opportunity Commission (EEOC) must be visited to file a complaint within 30 days of receipt of this DFEH *Notice of Case Closure* or within 300 days of the alleged discriminatory act, whichever is earlier.

DFEH does not retain case files beyond three years after a complaint is filed, unless the case is still open at the end of the three-year period.

Sincerely,



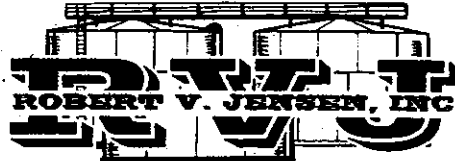
Geraldine Reyes  
District Administrator

cc: Case File

RON FOSTER  
PRESIDENT  
FOSTER POULTRY FARMS  
1000 DAVIS STREET  
LIVINGSTON, CA 95334



 **COPY**



PETROLEUM DISTRIBUTOR SINCE 1952

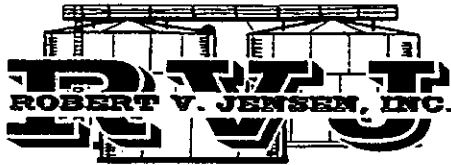
1-800-366-8210

Foster Farms - Palm

550  Scott Poiston







PETROLEUM DISTRIBUTOR SINCE 1952

1-800-366-8210

Scott Poiston

550 [REDACTED] Foster Farms-Palm









Yahoo! Help

### Hi there!

We'll get you set up on Yahoo! in three easy steps! Just answer a few simple questions, select an ID and password, and you'll be all set.

Already have an ID or Mail address?

[Forget your password or Yahoo! ID?](#)

I prefer content from  Yahoo! U.S. in English

#### 1. Tell us about yourself...

My Name  First Name  Last Name

Gender  - Select One -

Birthday  - Select Month -  Day  Year

I live in  United States

Postal Code

#### 2. Select an ID and password

Yahoo! ID and Email  @ yahoo.com

Password  Password Strength

Re-type Password

#### 3. In case you forget your ID or password...

*Alternate Email*

1. Security Question  - Select One -

Your Answer

2. Security Question  - Select One -

Your Answer

Just a couple more details...

Type the code shown  Need audio assistance?



Do you agree?  I have read and agree to the Yahoo! Terms of Service and Yahoo! Privacy Policy, and to receive important communications from Yahoo! electronically.

I have also read and agree to the Mail Terms of Service.

For your convenience, these documents will be emailed to your Yahoo! Mail account

Copyright © 2009 Yahoo! Inc. All rights reserved. Copyright/FP Policy | Terms of Service | Guide to Online Security  
Code verification technology developed in collaboration with the Capcha Project at Carnegie Mellon University  
NOTICE: We collect personal information on this site. To learn more about how we use your information, see our Privacy Policy.

Data is provided for informational purposes only, and may not be accurate. Yahoo! shall not be liable for any errors or delays in the content, or for any actions taken in reliance on these listings

Hi! Ready to register with eBay?



# Hi! Ready to register with eBay?

Help ?

It's your typical registration - it's free and fairly simple to complete.

Already registered or want to make changes to your account? Sign in.  
Want to open an account for your company?

## Tell us about yourself - All fields are required

First name Last name

Street address

City

State / Province ZIP / Postal code Country or region  
-Select- United States

Primary telephone number ext.:

Example: 123-456-7890  
Telephone is required in case there are questions about your account.

Email address

Re-enter email address

We're not big on spam. You can always change your email preferences after registration.

## Choose your user ID and password - All fields are required

Create your eBay user ID

Use letters or numbers, but not symbols. Learn more about creating great user IDs

Create your password

Case sensitive. Learn about secure passwords.

Re-enter your password

Pick a secret question

Select your secret question...

Your secret answer

If you forget your password, we'll verify your identity with your secret question

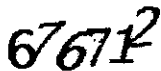
Date of birth

--Month-- --Day-- Year YYYY

You must be at least 18 years old to use eBay.

## The not-so-fine print

For added security, please enter the verification code hidden in the image.



Refresh the image | Listen to the verification code

I agree that:

- I accept the User Agreement and Privacy Policy.

### Your privacy is important to us

eBay does not rent or sell your personal information to third parties without your consent. To learn more, read our privacy policy.

Your address will be used for shipping your purchase or receiving payment from buyers.



# Hi! Ready to register with eBay?

- I may receive communications from eBay and can change my notification preferences in My eBay.
- I'm at least 18 years old.

[Continue](#)

Copyright © 1995-2009 eBay Inc. All Rights Reserved. Designated trademarks and brands are the property of their respective owners. Use of this Web site constitutes acceptance of the [eBay User Agreement](#) and [Privacy Policy](#).

eBay official time



[About SSL Certificates](#)



Vehicles | Real Estate | For Rent | Jobs | Pets | Items for Sale | Tickets | More ▾

Search Classifieds

in Best Match ▾

Find It!

For Professionals

Post an Ad

### Create an Account or Sign In

Create an Oodle account - it only takes a minute!

Sign in with your Facebook or Oodle account...

#### Create an Account

First Name

Last Name

Email

Password

Re-enter

I accept Oodle's Terms of Service

Submit

Do I need an account to post on Oodle?

Yes. Everyone who posts an ad on Oodle must have a verified account.

#### Sign in with your Facebook account

Connect with Facebook

Login with Facebook! You won't have to remember another password and all of your listings will appear in the Facebook Marketplace.

#### Sign in with your Existing Oodle Account

Email

Password

Forgot your password?

Sign In

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GarageSaleTime.com

- HOME
- POST A GARAGE SALE
- MY ACCOUNT
- BROWSE
- REGISTRATION
- FAQ
- CONTACT US
- LOGIN

### REGISTRATION

**First Name:**

- Your name will be kept private. We only ask in case we need to contact you.

**Last Name:**

**Address:**

- Your address will be used to display the location of the garage sale.

**Address2:**

**City:**

**State:**

Alabama

**Zip code:**

**Phone:**

- Your phone number and email will not be available on the website, We only ask in case we need to contact you.

**Email:**

**Username:**

- Your username is your unique identity.
- Your password must be at least 6 characters long.
- We'll never ask you for your password in an email.

**Password:**

Agree with the terms of use



Trade Friendly!

Email

OpenID

Remember Me



## Welcome to commuto

Commuto is a new bartering service built around social experiences and community environments, where we help you save money, get what you want and make friends. Commuto offers:

**Local community trading:** Create or join any community you wish such as your city, school, workplace or anywhere else.

**No costs to you:** By keeping trading local, we have eliminated shipping costs. Oh, and there is no commission at all and you don't need to buy points.

**Social Bartering:** Social experiences that help you meet others in your communities with similar interests.

## Register for free

Full name:  First

Last

Email:

Email

Country:

Select country

State/Province/Region:

City:

Are you a student?

Password:

By registering, you confirm that you have read and agree with the Terms of Use and Privacy Policy.



Browse **commuto**



Video presentation



What people are saying about us

[Home](#)

[Help](#)

[About Us](#)

[Contact Us](#)  
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[Privacy policy](#)

[Terms of Use](#)



My Redbeacon

Request Services

Provide Services

[Back to Welcome page](#)

## How it works

Redbeacon matches consumers needing virtually any service to qualified local businesses and professionals who can do the job at the time and place you need

[Provide services? See how it works for you >](#)

### 1 Request a service: Tell us what you need and when

Type a word or two about what you are looking for  
Select the location and time (even if that's right now!)

Describe your project in detail so local providers can quote accurately

1 Who do you need? [help](#)

2 When do you need the job done? [help](#)

Right now Activate Red Beacon

On a specific date and time

05/15/2009  between 9:00 AM  and 9:00 AM

[Add an alternate day and time \(may increase your number of bids\)](#)

### 2 Review qualified providers and compare their prices

Redbeacon notifies qualified providers available to start working at the time and place you need

Providers have a set amount of time to review your request and offer their best price

Redbeacon emails you to return to the site when all quotes are in (typically 4 hours)

<b>Ace Contracting</b> ★★★★★ May 25th at 3:00 PM	<b>\$550</b> \$50 flat fee + 4 hours x \$40 per hour <a href="#">View Details</a>
<b>Mr Plumber</b> ★★★★★ May 25th at 3:00 PM	<b>\$470</b> \$50 flat fee + 4 hours x \$40 per hour <a href="#">View Details</a>
<b>Bay Area Plumbing</b>	<b>\$605</b>

### 3 Select a provider and schedule the job online

Select a provider based on detailed profiles, ratings... and the price quoted for your job

When you select a provider, the appointment is scheduled. We'll even remind you 24 hours before the job is set to begin!

**QUOTE DETAILS**

**\$550**  
\$50 flat fee + 4 hours x \$40 per hour  
(Price does not include parts)

May 25th at 3:00 PM

[Review and Accept Quote](#)

work from Mr Plumber

[Request a Service](#) (Try it - it's FREE!)







My Redbeacon

Request Services

Provide Services

Profile Details    Availability    Service Description

**What service do you provide?** [help](#)

Enter your skill or occupation\*

ex: plumber, math tutor, or 'generalist'

Or browse skills

**How can you be reached?** [help](#)

Business name

Add your logo or avatar

Contact phone\* (only revealed to customers when you win the job)

Cell phone for text msg alerts (instant updates on your jobs)

Same as contact phone

**Where do you work?** (Your address is never shared) [help](#)

Street Address\*

City\*

State\*

Zip code\*

CA

How far are you willing to travel\*

1 10 20 30 40 50 60 70 80 90 100

10 Miles

Your work area includes

(No nearby cities)

you want	X	✓
Review honest provider ratings from other Redbeacon users	X	✓
It's FREE to use	Sometimes	Always



[My Redbeacon](#)

[Request Services](#)

[Provide Services](#)

**Our Service**

[Our Team](#)

[Redbeacon Blog](#)

**Press & Bloggers**

[Press Center](#)

[In The News](#)

**Support**

[Legal Information](#)

[Send Us Feedback](#)

[Contact Us](#)

**What is Redbeacon?**

Redbeacon isn't like typical local search directories that simply return local business listings with ratings and reviews, leaving you to sort through dozens of entries.

Instead, we notify businesses and professionals in your area that we believe can serve you best, and invite them to submit a price quote for your job.

Then we show you the price quotes and profiles of people interested in doing your job, and allow you to book an appointment with them, saving you the time and hassle of calling around.

Redbeacon helps you get the job done at the time and place you want, at the best price possible!

If you need something done for your home, for your work, or for yourself, use Redbeacon to find the right local business or freelancer for the job.

**Learn How to Request Services**



[Learn more >](#)

**Learn How to Provide Services**



[Learn more >](#)



**Why Use Redbeacon?**

We make it easy to say what you're looking for and set a time & place for the job

We send your request to the best providers in your area who quote their lowest price

We give you the information you need to select the right provider and schedule your appointment with them online

Best of all, it's completely free to use!

	Other Sites	Redbeacon
See providers' price quotes before you decide who to go with	X	✓
Schedule appointments online with providers you select	X	✓
Find providers who can work at the time and place		



# craigslist: account signup

Please enter your email address and the verification words shown below: (what's this?)

email address:

verification word:

Lomasde

sahgs



stop spams  
read books...

create account



[bakersfield craigslist](#) > [services offered](#) > [adult services](#)

[\[ help \]](#) [\[ post \]](#)

search for:	in: <input type="text" value="adult services"/>	<input type="button" value="Search"/>	<input type="checkbox"/> only search titles
			<input type="checkbox"/> has image

[ Thu, 07 Jan 13:01:51 ]

[ [report suspected exploitation of minors](#) ] [ [parental control soft](#)  
[\[ ASK FOR REFERENCES \]](#) [ [Inquire before you](#) ]  
[\[ PERSONAL SAFETY TIPS \]](#) [ [AVOIDING SCAMS & FRAUD](#) ] [ [success st](#)

**Thu Jan 07**

[SWEET AND SEXY LATINA AVAILABLE 24hrs - t4m](#) - (bakersfield ca.) pic

[\\*\\*\\*\\*NEW YEARS SPECIALS\\*\\*\\*\\*](#) - w4m - (BAKERSFIELD) pic

[AMANDA is back in town!](#) - w4m - (BAKERSFIELD) pic

[Come over to get Relaxed](#) - (ming and stine) pic

[====Wonderfull soothing relaxing new Asian beautiful Lady massage====](#) - w4m - (Bakersfield/661-236-2814) pic

[\\*+\\* Comfortable & ClassII \\*+\\*](#) - w4m - (BakersField Off 99 Frwy) pic

[WOW!!!! ARE THOSE TRIPLE Dz](#) - (IN&OUTCALLS) pic

[SEXY-CURVY-BEAUTIFUL](#) - t4m - pic

[•☆o ———> L~{☆}{☆}~ K <——o°☆•1• OF •A•KIND!](#) - w4m - (INCALL // OUTCALL) pic

**Wed Jan 06**

[•☆o ———> L~{☆}{☆}~ K <——o°☆•1• OF •A•KIND!](#) - w4m - (INCALL // OUTCALL) pic

[Italian Princess!!!](#) - w4m - (Bakersfield) pic

[%%%%%%%%\(C\)\(H\)\(E\)\(C\)\(K\) \(M\)\(E\) \(O\)\(U\)\(T\)%%%%%%%%](#) - w4m - (bakersfield, california) pic

[HOT lil' BONDE DOLL](#) - w4m - (bako) pic

[Beautiful & Sexy Jessy Available All Night](#) - w4m - (Bakersfield) pic

[TS HERE FOR YOU](#) - t4m - (BAKERSFIELD) pic

[~•♥•~ A little bit of sweetness goes a long way.... ~•♥•~](#) - w4m - (Bakersfield) pic

[massage](#) - w4m - (Bakersfield) pic

[Unforgettable Rubdown..Blk shemale](#) - t4m - (BAKERSFIELD) pic

[Gabriela Still In Bakersfield!!](#) - w4m - (My Upscale Place) pic





ViSiTiNG Exotic b0mbshell iNCALLS/oUTcalls - w4m - (bakersfield in/out) pic

HOT lil' BONDE DOLL - w4m - (bako) pic

(~'~. o° ♥\*\* H.A.P.P.Y.....N.E.W.....Y.E.A.R!!(~'~. o° ♥ - (INCALL // OUTCALL) pic

•☆o → L~{☆}{☆}~ K ← o°☆•1• OF •A•KIND! - w4m - (INCALL // OUTCALL) pic

\*\*\* The perfect Speci\*a\*1 4 U\*\*\* - w4m - (Bakersfield) pic

\*\*\* The perfect Speci\*a\*1 4 U\*\*\* - w4m - (Bakersfield) pic

I LOVE SAYING 2010 FANTASTIC 2010!!! READY!! BLONDE AMERICAN 2010! - w4m - (bakersfield) pic

Δ Incredible, amazing experience - w4m - (IN/OUT)

THIS IS IT! - w4m - (BAKERSFIELD) pic

take a look... - pic

%%(C)(H)(E)(C)(K)(M)(E)(O)(U)(T)%% - w4m - (bakersfield, california) pic

====Wonderfull soothing relaxing new Asian beautiful Lady massage==== - w4m - (Bakersfield/661-236-2814) pic

□□□□ I AIM TO PLEASE YOU□□ - w4m - (BAKERSFIELD IN/OUTCALL) pic

\*\*\*\*NEW YEARS SPECIALS\*\*\*\* - w4m - (BAKERSFIELD) pic

SuPer SeXy ambitious LaDy!!!) - pic

Exotic Beauty! - w4m - (Upscale Location) pic

Come over to get Relaxed - (ming and stine) pic

Relaxing LOW PRICE sensual and deep tissue massages-only 80 an hour! - w4m - (Bakersfield)

""## You Would Want To Read This Post - w4m - (Bakersfield) pic

**Sun Jan 03**

\*\*\* The perfect Speci\*a\*1 4 U\*\*\* - w4m - (Bakersfield) pic

Come Enjoy My Company - (Bakersfield)

Come over to get Relaxed - (ming and stine) pic

Δ Incredible, amazing experience - w4m - (IN/OUT)

**Sat Jan 02**

CHECK ME OUT GUYS - w4m - (ALL OF KERN COUNTY) pic

Beautiful & Sexy Jessy Available All Night - w4m - (Bakersfield) pic

%%%%%%%%(C)(L)(A)(S)(S)(Y)(L)(A)(D)(Y)%%%%%%%% - w4m - (bakersfield) pic

~\*!ALL AMERICAN BLONDE HOTTIE!! - w4m - (Bakersfield) pic

SATURNIGHT~\*~FEVER - w4m - (bakersfield) pic

LiL Mor \*Mature \* Latina \* Masseuse \* Avail. In \* Bako \* - w4m - (n. Bakersfield Area-In/Outcall) pic

Come Enjoy My Company - (Bakersfield) pic

•\*~\*~\*IF YOU@LÖÖK!NG FÖR A REAL@WÖMAN\*~\*~\* - w4m - (KERN CO. № 559.720.4869) pic

Come over to get Relaxed - (ming and stine) pic

\*\*\*Nice and Sweet\*\*\* - w4m - (Bakerfields) pic

\*\*\*FUN FUN FUN\*\*\* - w4m - (BAKERFIELDS)

**Fri Jan 01**

\*\*\*\*\*HOLIDAYS\*\* SPECIAL\*\* \$40.00/HR\*\* Youthfull Asian massage\*\*\*\*\* - w4m - (Bakersfield/661-833-2729) pic

Δ Incredible, amazing experience - w4m - (IN/OUT)

**Thu Dec 31**

\*\*\*\*NEW YEARS SPECIALS\*\*\*\* - w4m - (BAKERSFIELD) pic

Come Enjoy My Company - (Bakersfield) pic

Spend the New Year with me !! - w4m - (Bksfld SW) pic

♥—P—E—R—F—E—C—T—L—A—T—I—N—M—A—S—S—A—G—E—♥ - t4m - (Bakersfield... surrounding areas.) pic



bakersfield craigslist > personals > casual encounters

[ help ] [ post ]

search for: _____	in: casual encounters	<input type="button" value="Search"/>	<input type="checkbox"/> only search titles
Poster's Age: min _____ max _____			<input type="checkbox"/> has image

[ Sun, 15 Nov 11:03:48 ]

[search keywords : mw4w, w4m, w4w, m4w, m4m, t4n  
 [ report suspected exploitation of minors ] [ parental control softw  
 [ PERSONAL SAFETY TIPS ] [ AVOIDING SCAMS & FRAUD ] [success s

**Sun Nov 15**

Looking for head. - m4m - 24 - (Bakersfield)

Info for the ladies who need xtra \$\$\$ - (anywhere)

Hot male visiting Tehachapi - m4w - 22 - (Tehachapi/Bakersfield) pic

Take Me Out For A Night On The Town - w4m - 22 - (Double Tree Hotel - Bakersfield)

Your cock and balls/my mouth - m4m - 30 - (your place)

sports fan looking for single man - w4m - 23 - (Bakersfield)

Dress for play - m4t - 49 - (shafter)

Cum and take on me this night please - w4m - (bakersfield)

you want fuck my ass today....only masc top's w/ big dick. - 26 - (bakersfield) pic

looking for a very very discret bi, str8, or curios top today only - m4m - 27 - (SW bakersfield) pic

xtreme slave looking 2 b cock spanked - m4m - (bakersfield)

cuddle date? - m4w - 26 - (sw bako)

Dancer & Escorts For Hire - m4w - (Bakersfield)

Can you show me something new? - w4m - 25 - (Grand Lakes)

married and not getting any at home - m4w - 50 - (palmdale )

Geter Done! - w4m - 33 - (Bakersfield)

Unload? - m4m - 35 - (Bakersfield)

drain boners - m4m - 48 - (kernville)

sub male for Dom Female/Couple - m4w - (Bako area) pic

Suck on this - w4m - 23 - (Gamsey)

I'd rather laugh with the sinners... - w4m - 32 - (Bakersfield)

I NEED SOME PUSS BAD - m4w - 46 - (BAK)

can host & a little bit tipsy - m4m - 20 - (bakersfield)

No games!! - m4w - 31 - (sw)

want to see - m4m -

i need sex - m4w - 25 - (white ln) pic

HAD ENOUGH! NEED FUN! - w4m - 42 - (BAKERSFIELD (temp))

**Sat Nov 14**

Have tounge willing to please - m4w - 42 - (Bakersfield)

Let the fun and games begin - w4m - 26 - (Jones)

my level of boredom has reached epic proportions - w4m - 24 - (Jones)

chill n discreet bi dude... - m4m - 38 - (bkrsfld)

lookin for fun Sun a.m. in bako - m4t - 31 -

Let's pick a destination - w4m - 23 - (Stine)

My first time - w4w - 22 - (Bakersfield)

Naughty married man looking for naughty lady - m4w - 35 - (Bakers)

SINGLE ,READY !!! - m4w - 36 - (REXLAND) pic

looking for nice single guy - w4m - 23 - (Old River)

seeing whats here - m4w - 22 - (bakersfield)

Timing is everything - w4m - 24 - (Bakersfield)

couple looking for a female - mw4w - 39 - (E. Bakersfield) pic

looking for some play time - m4w - 53 - (in town )

looking for oral - m4m - 36 - (bako) pic

Healthy guy wanted - w4m - 24 - (Bakersfield)

I just want a little something for me. - w4m - 53 - (Bakersfield)

What Do I Have To Do ?? - m4w - 55 - (Bakersfield)

Can you show me something new? - w4m - 24 - (River Run)

ARE THERE ANY WOMEN OUT THERE !!! - m4w - 55 - (BAKERSFIELD)

HEY LADIES - m4w - 55 - (BAKERSFIELD) pic

hotie - w4w - 28 - (bakersfield)

what to DO - m4w - 30 - (S.BAK.) pic

Male 38 looking for ns good time - m4w - 38 - (NE Bakersfield)

Lets Fuck Around - m4m - 20 - (near bc)

ANY NASCAR LADIES !!! - m4w - 55 - (BAKERSFIELD) pic

CPL for CPL or BiFem for tonight.. - mw4mw - 35 - (SW) pic

Do you need a BJ tonight, I host 4 fun - m4m - 40 - (SW Bako)

Seeking Playmate - t4t - 26 - (West) pic

Seeking Playmate - w4w - 26 - (West) pic

Young Couple Seeking 3rd - mw4w - 22 - (Central) pic

Outgoing & Fun - w4m - 21 - (Bakersfield)

Let's get together - m4w - 42 - (Bakersfield)

fun couple - mw4w - 36 - (Taft)

Help Please - w4m - (bakersfield)

Looking for my Forever Friend!! :) - w4m - 42 - (Bakersfield)

3 some- - m4mw - 42 - (SW Bakersfield) pic

new to this - mw4w - 2926 - (bakersfield)

lookin for bbw - m4w - 25 - (bakersfield)

NEED A LITTLE FUN !! - m4w - 55 - (BAKERSFIELD) pic

i wanna fuck badly - m4m - 21 - (bako)

clean bottom - m4m - 37 - (stockdale)

Want to Help start saturday right! - mw4w - 25 - (Gosford, whitelane bksfld)

Wood Unloaded Here - m4m - 34 - (Bakersfield)

lingerie for you - m4w - (bak)

model in town for a few days - m4w - 21 - (bakersfield) pic

Just right - w4m - 24 - (Bakersfield)

Looking for older Daddy type - w4m - 30 - (Bakersfield)

Check this ..... - m4w - (bakersfield/tehachapi)

Looking for someone to have fun with - m4w - 27 - (Bakersfield)

Any one out there for a quicky? - m4w - 27 - (Bakersfield)

divine - m4w - 26 - (bakersfield) pic

Latino Men... want ur cock sucked?? - 32 - (NE BFL) pic

Looking for a golden shower on saturday night - m4m - 37 - (hotel off 99) pic

**Fri Nov 13**

Life is too short ... - w4m - 26 - (Bakersfield)

One hottie looking for another - w4m - 24 - (Bakersfield)

Hey Cowboy Cassanova "Slick Rick" - w4m - 31 - (Central Coast)

drinks & ??? it's up to you - mw4m - 35 - (PORTERVILLE)

masculine bottom looking for fuck buddy - m4m - 32 - (NE BAKO)

FIRST TIME - mw4w - 40 - (bako )

Seeking party Buddy - w4m - 33 - (Bakersfield)

looking for masc bi top let go to theatre at 8 tonight at valley plaza - 27 - (SW bakersfield ) pic

Roughnecks, Cowboys - m4m - 34 - (Bakersfield)

back in connecticut - w4m - 34 - (Bakersfield)

Young Couple Seeking 3rd - mw4w - 2622 - (Central)

i just want to have fun - w4m - 24 -

come taste my body and like it, make me cum - m4w - 30 - (bako) pic

It's time to set sail on a new journey. - w4m - 23 - (Bakersfield)

BBWs' where are you? - m4w - 24 - (S.W. Bako)

im lookin for a girlfriend - m4mw - 26 - (sw bakersfield ca) pic

Bisexual - m4m - 48 - (Bakersfield)

Suck -


Looking for non bitchy wemen - m4w - 22 - (Kenville)

next 100 postings

craigslist

bakersfield

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help, faq, abuse, legal  
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about help

**community**  
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events classes

**personals**  
strictly platonic  
women seek women  
women seeking men  
men seeking women  
men seeking men  
misc romance  
casual encounters  
missed connections  
rants and raves

**discussion forums**  
1099 gifts pets  
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fitness open w4w  
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**housing**  
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**for sale**  
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pennsylvania  
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rhode island  
s carolina  
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croatia  
czech repub  
denmark  
ecuador  
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germany  
great britain  
greece  
hong kong  
hungary  
india  
indonesia  
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israel  
italy  
japan  
korea  
lebanon  
luxembourg  
malaysia  
mexico  
micronesia  
netherlands  
new zealand  
norway  
pakistan  
panama  
peru  
philippines  
poland  
portugal  
russia  
singapore  
south africa  
spain  
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**craigslist > casual encounters > warning & disclaimer**

Just

Unless **all** of the following points are true, use your "back" button to exit this part of craigslist:

1. I am at least 18 years old.
2. I understand "casual encounters" may include adult content.
3. I agree to flag as "prohibited" anything illegal or in violation of the craigslist terms of use.
4. I agree to report suspected exploitation of minors to the appropriate authorities.
5. By clicking on the links below, I release craigslist from any liability that may arise from my use of this site.

**casual encounters >>> w4m m4m m4w w4w t4m m4t**

**mw4mw mw4w mw4m w4mw m4mw w4ww m4mm mm4m ww4w ww4m mm4w m4ww w4mm t4mw mw4t**

SCAM ALERT - scammers posing as potential romantic partners are directing CL users to age and identity verification sites, dating/adult/cam sites (where you can see their "pics" or chat with them), even sites designed to deliver malware --- all in hopes of earning affiliate marketing commissions at your expense.

FLIN FACT: Reporting a scammer's "affiliate ID" to their affiliate marketing program often results in confiscation of the scammer's ill-gotten gains by the affiliate program.

Choosing safer sex for you and your partner greatly reduces the risk of contracting STDs including HIV -- you can get answers to your safer sex questions, courtesy of staff members at the SF city clinic

craigslist has implemented the PICS content labeling system to assist parents and others who may be interested in content filtering. The PICS system is compatible with most commercially available as well as open source content control software packages.

bakersfield craigslist > personals > casual encounters

[ help ] [ post ]

search for: _____	in: casual encounters	<input type="button" value="Search"/>	<input type="checkbox"/> only search titles
Poster's Age: min _____ max _____			<input type="checkbox"/> has image

[ Sat, 14 Nov 15:47:12 ]

[search keywords : mw4w, w4m, w4w, m4w, m4m, t4n  
 [ report suspected exploitation of minors ] [ parental control softw  
 [ PERSONAL SAFETY TIPS ] [ AVOIDING SCAMS & FRAUD ] [success s

**Sat Nov 14**

Do you need a BJ tonight, I host 4 fun - m4m - 40 - (SW Bako)

Seeking Playmate - t4t - 26 - (West) pic

Seeking Playmate - w4w - 26 - (West) pic

Young Couple Seeking 3rd - mw4w - 22 - (Central) pic

Outgoing & Fun - w4m - 21 - (Bakersfield)

Let's get together - m4w - 42 - (Bakersfield)

fun couple - mw4w - 36 - (Taft)

Help Please - w4m - (bakersfield)

Looking for my Forever Friend!! :) - w4m - 42 - (Bakersfield)

3 some- - m4mw - 42 - (SW Bakersfield) pic

new to this - mw4w - 2926 - (bakersfield)

I really need a massage - m4w - 42 - pic

seeking younger bottom - m4m - 50 - (Far East side near Rio Bravo CC) pic

4 the "real" ladies..I dare you 2 open this - m4w - 54 - (Kern County)

lookin for bbw - m4w - 25 - (bakersfield)

NEED A LITTLE FUN !! - m4w - 55 - (BAKERSFIELD) pic

i wanna fuck badly - m4m - 21 - (bako)

clean bottom - m4m - 37 - (stockdale)

married man looking for affair - m4w - 40 - (N.W) pic

Want to Help start saturday right! - mw4w - 25 - (Gosford, whitelane bksfld)

any freaky girls ? - m4w - 29 - (kern )

Panty boi or CD? - m4t - 49 - (Shafter)

Wood Unloaded Here - m4m - 34 - (Bakersfield)

lingerie for you - m4w - (bak)

model in town for a few days - m4w - 21 - (bakersfield) pic

Just right - w4m - 24 - (Bakersfield)

Looking for older Daddy type - w4m - 30 - (Bakersfield)

looking for a nauty girl - m4w - 29 - (kem )

Check this ..... - m4w - (bakersfield/tehachapi)

Looking for someone to have fun with - m4w - 27 - (Bakersfield)

Any one out there for a quicky? - m4w - 27 - (Bakersfield)

divine - m4w - 26 - (bakersfield) pic

Latino Men... want ur cock sucked?? - 32 - (NE BFL) pic

Looking for a golden shower on saturday night - m4m - 37 - (hotel off 99) pic

### **Fri Nov 13**

Life is too short ... - w4m - 26 - (Bakersfield)

One hottie looking for another - w4m - 24 - (Bakersfield)

Would you mind if I watched.... - m4mw - 54 - (you host.)

Hey Cowboy Cassanova "Slick Rick" - w4m - 31 - (Central Coast)

drinks & ??? it's up to you - mw4m - 35 - (PORTERVILLE)

Left hangin - cd4m - 42 - (ne)

masculine bottom looking for fuck buddy - m4m - 32 - (NE BAKO)

FIRST TIME - mw4w - 40 - (bako )

Seeking party Buddy - w4m - 33 - (Bakersfield)

looking for masc bi top let go to theatre at 8 tonight at valley plaza - 27 - (SW bakersfield ) pic

Roughnecks, Cowboys - m4m - 34 - (Bakersfield)

back in connecticut - w4m - 34 - (Bakersfield)

Young Couple Seeking 3rd - mw4w - 2622 - (Central)

i just want to have fun - w4m - 24 -

come taste my body and like it, make me cum - m4w - 30 - (bako) pic

It's time to set sail on a new journey. - w4m - 23 - (Bakersfield)

BBWs' where are you? - m4w - 24 - (S.W. Bako)

im lookin for a girlfriend - m4mw - 26 - (sw bakersfield ca) pic

Bisexual - m4m - 48 - (Bakersfield)

Suck -

Looking for non bitchy wemen - m4w - 22 - (Kernville)

looking for hung top..nice bttm here - m4m - 18 - (south bako)

Friday Head 4 hung tops - m4m - 29 - (Tehachapi Only)

Let you catch me and watch - 37 - (BAK)

Are there any real woman on cl - m4w -

In need of a blow job,,Thats all. - m4w - 55 - (Bakersfield)

Who wants fun? - m4w - 48 - (Bakersfield)

Seeking 1 very busty Bakersfield Female - m4w - (Bakersfield)

anybody care 4 text - m4w -

ONLY REAL PEOPLE PLEASE NO FLAKES - m4w - 28 - (661) pic

if you live in lake isabella or can come to lake isabella - m4w - 26 - (lake isabella)

Submissive Wanted ! What Are You Willing To Let Me Do To You ?....- m4? - (Bakersfield)

I want to be handed a rough one - w4m - (bakersfield)

couples/females only - m4mw - 55 - (bakersfield)

can host i have what you want w4m - 30 - (bakersfield)

Couple Interested - mw4m - 43 - (ne)

Yes, I like BIG GIRLS, too - m4w - 33 - (Bakersfield Ca)

MASC,CHILL,N BI - m4m - 38 - (BAKO)

motoreyle partner ,toy run - m4w - 49 - (bakersfield)

Hi Daddy wanna take my panties off and fuck me? - t4m - 24 - (your place - Bakersfield) pic

LOOKING 4 TONIGHT FRI - mw4m - 27 - (sw bakers)

Looking to meet someone REAL & fun - m4w - 31 - (Bakersfield SW)

Ready for some fun - m4w - 48 - (Bakersfield)

Out of Towner - m4mw - 45 - (Bakersfield)

In Town from TX - m4w - 45 - (Bakersfield)

Awake n looking 4 fun! - m4m - 18 - (SouthWest Bakersfield) pic

**Thu Nov 12**

Still up looking for a BJ?? - m4m - 36 - (SW Bako)

Looking for younger cock to suck - m4m - 28 - (Ming west Bakersfield)

sexual attention, sexual release, hot and horny here, get some - m4w - 31 - (ebakersfield) pic

horned up bro,chill n bi... - m4m - 38 - (bako)

lookin to fuck rite now - m4w -

LOOKING FOR A BOTTOM - 37 - (BAKERSFIELD)

ROMANTIC AND PASSIONATE GUY - m4w - 38 - (Bakersfield)

FREE MASSAGE - mw4mw - 30 - (661)

R U READY? - m4w - 20 - (bako near bc)

Latin male for fun - m4mw - (Bakersfield )

Hang out? - m4m - 27 - (Bakersfield) pic

Let's enjoy some time together! - m4w - 39 - (Bakersfield) pic

Fit guy for older woman - m4w - 28 - (Bakersfield)

Young man wants older woman - m4w - 18 - (bako)

All Work No Fun! - m4w - 30 - (Bakersfield)

Anyone interested? - m4w - pic

looking for bi fem to watch us - mw4w - 22 - (bakersfield)

journeys here - w4m - 19 - (bakersfield)

Leaving To Las Vegas And Want To Take A Female Freind!!! Who's Game??? - mw4w - 21 - (Tulare, Bakersfield, Visalia and Between)

crossdressing.. - m4t - 25 - (bakersfield)

next 100 postings

SF bay area craigslist &gt; personals &gt; casual encounters

[\[ help \]](#) [\[ post \]](#)

all SF bay area	san francisco	south bay	east bay	peninsula	north bay	santa cruz
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search for:	in: casual encounters	<input type="button" value="Search"/>	<input type="checkbox"/> only search titles
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[ Thu, 07 Jan 12:56:14 ]

[\[safer sex forum\]](#) [\[search keywords : mw4w, w4m, w4w, m4w, m4m, t4n](#)  
[\[ report suspected exploitation of minors \]](#) [\[ parental control soft](#)  
[\[ PERSONAL SAFETY TIPS \]](#) [\[ AVOIDING SCAMS & FRAUD \]](#) [\[success s](#)

**Thu Jan 07**[kitty cat wants to play - \(everywhere\)](#)[Let's hookup for the night of our lives - w4m - 26 - \(healdsburg / windsor\) pic](#)[Mature Gentleman Only Please! - w4m - \(Santa Cruz\) pic](#)[bay ladies....holla at dis latina fem!! - mw4w - 24 - \(emeryville\) pic](#)[Wanna Chat? - w4m - 28 - \(Oak Glen Park\)](#)[\(N S A F C U K\).\(c0m\) or craigslist? you decide - w4m - 23 - \(cole valley / ashbury hts\)](#)[looking for friends and possibly more - w4m - 27 - \(all neighborhoods\)](#)[Do you have an oral fantasy? - w4m - \(bayview\)](#)[Can I at least get a good date before the weekend? foster city - w4m - 22 - \(foster city\)](#)[just looking for some fun - m4w - 37 - \(dublin / pleasanton / livermore\)](#)[HOT jock for today. - m4t - pic](#)[Conversations make me happy - w4m - 24 - \(santa rosa\)](#)[Let's hookup for the night of our lives - w4m - 28 - \(cole valley / ashbury hts\) pic](#)[looking for large, shaved cock to suck - m4m - 30 - \(berkeley north / hills\) pic](#)[sleep over - w4m - 22 - \(santa rosa\)](#)[??LoOkInG 4 Fun??\\*:.★.:. - w4m - 19 - \(alameda\) pic](#)[LOOKING for a COUGAR/MILF - m4w - 26 - \(Marin\)](#)[Looking to please - m4w - \(tenderloin\)](#)[Just horny - m4w - 24 - \(san jose south\) pic](#)[Don't judge book by its cover... - w4m - 59 - \(south san francisco\)](#)

Mature Men Needed - mw4m - (santa clara)

Wish you were here - w4m - 26 - (Oakland)

Gorgeous girl waiting for you - w4m - 22 - (tiburón / belvedere)

There is only me that you shall find - w4m - (western addition)

lets play today - m4w - 25 - (emeryville) pic

will suck a straight guy - m4m - (fremont / union city / newark)

Bi Male wants a young Femme, TS or CD to A\$\$ist with transition - m4t - 34 - (Bay Area)

Youre gonna like me - w4m - 23 - (san jose east) pic

One of a kind - w4m - 27 - (treasure island)

busco gorditas - m4w - 42 - (mission district)

Beautiful face, bigger body - w4m - (millbrae)

You - w4m - 26 - (san jose north)

Want some cum baby? - m4w - 23 - pic

Wanted a lover - w4m - (western addition)

Looking for a woman who needs a facial - m4w - 32 - (redwood city)

A TASTING THIS AFTERNOON - m4w - 35 - (noe valley)

Are you curious about Anal Sex like me? - m4w -

Want my cock suck and learn to suck - m4m - 40 - (dublin / pleasanton / livermore) pic

I am what i am. real Man, real good - m4w - 39 - (santa rosa)

downtown library hook up m4m - 28 - (san jose downtown)

Are you anal? - w4m - (marina / cow hollow)

I will take anything tonight, I am desperate pacifica - w4m - 22 - (pacifica)

Desireable Everyone needs some TLC in their life!! - w4m - 56 - (frisco)

Sexy - t4m - 27 - (san jose north)

guy looking to lose my virginity - 23 - (santa cruz)

There has got to be a way to meet someone! - m4m - 39 - (Sonoma County)

str8 - 35 - (downtown / civic / van ness) pic

you ever see that guy... - m4m - 39 - (sunnyvale)

[any ladies up for some fun? - m4w - 25 - \(santa cruz\)](#)

[I am not your average gal excelsior / outer mission - w4m - 22 - \(excelsior / outer mission\)](#)

[Fit woman looking for a man - w4m - \(bayview\)](#)

[Gloryhole tonight - m4m - \(oakland piedmont / montclair\)](#)

[Looking for a fun, flirty girl, for ongoing situation - m4w - 30 -](#)

[Looking for a female who enjoys getting oral sex - m4w - 25 - \(oakland downtown\)](#)

[Are you Submissive? - m4w -](#)

[Strong, stronger, strongest!! - w4m - 22 - \(treasure island\)](#)

[Feeling bored at work.. Wanna chat? - m4w - 36 - \(san jose downtown\)](#)

[lets see a movie - m4w - \(santa rosa\)](#)

[Do you want - w4m - 27 - \(santa rosa\)](#)

[I do not need a perfect guy - w4m - \(danville / san ramon\)](#)

[Blk BBW 4 Wht or Latino - w4w - 44 - \(palo alto\)](#)

[\\* LOOKING TO PLAY \\* - w4w - 20 - \(hercules, pinole, san pablo, el sob\) pic](#)

[\\*\\*Seeking Handsome Man For NSA Sex\\*\\* - w4m - 30 - \(walnut creek\)](#)

[Attractive guy seeking Sandra Bullock Look-alike - m4w - 35 -](#)

[blond bottom seeks black to service regularly - m4m - 47 - \(downtowns sf\)](#)

[Bi, straight, curious....I am fine with either greenbrae - w4m - 22 - \(greenbrae\)](#)

[I'm Bad With Words - w4m - 24 - \(santa rosa\)](#)

[W4W looking to Host this afternoon - w4w - pic](#)

[Help me! i'm bored and horny! - m4w - \(mountain view\)](#)

[SERVICE FOR YOUNG STUDS - m4m - 37 - \(sunnyvale\)](#)

[nice chocolate bar for tgurl with a sweet tooth - m4t - 27 - \(downtown / civic / van ness\) pic](#)

[I am an anal newbie. I need some experience! - w4m - \(castro / upper market\)](#)

[horny latino seeking older - m4m - 23 - \(oakland piedmont / montclair\)](#)

[You should be there for me - w4m - \(treasure island\)](#)

[seeking a fearless man - w4m - 27 - \(san jose north\)](#)

[I love - w4m - 22 - \(san jose north\)](#)



ISO-Mr. Boombastic - w4m - 23 - (south san francisco)

that's crazy - m4w - 30 - (san jose west)

Kitty Play w/This Sexy Blk Femme - 30 - (Mines or Yours)

Pleasure please - w4m - 18 - (vallejo / benicia)

I have some fantasies can you help? - w4m - 24 - (SOMA / south beach)

Something different - w4m - 24 - (African American Museum)

Looking for the rite guy - w4m - 28 - (san jose north)

plz...don't bore me further - w4m - 23 - (potrero hill)

slut for gang bangs visting bay area - w4mm - 21 - (concord / pleasant hill / martinez) pic

don't get the wrong idea - w4m - 25 - (santa rosa)

Discreet NSA for grad student - w4m - 23 - (west portal / forest hill)

SEXY ASIAN SEEKS GENEROUS MALE - w4m - 21 -

I would like a massage - m4t - 58 - (san rafael) pic

Italian gal would like a nice guy to take her out treasure island - w4m - 22 - (treasure island)

How about a fleshlight hand job ??? - m4m -

Bottom Looking for Tops! - m4m - 35 - (castro / upper market)

What are you set for? - w4m - (SF bay area)

An Affair to uh, Remember - m4w - 52 - (fremont / union city / newark)

looking for NORMAL men! - w4m - 22 - (san jose north)

Show me the intensity - w4m - 22 - (petaluma)

couples that need a place to watch, i host - m4mw - 29 - (holiday inn van ness ) pic

Any couples or female for a little day time fun? - m4mw - 33 - (vallejo / benicia) pic

nsa is the best way to play - w4m - 23 - (san jose north)

give it to me - w4mm - 22 - (sunnyvale)

next 100 postings

los angeles craigslist > personals > casual encounters

[ help ] [ post ]

all los angeles westside-southbay SF valley central LA san gabriel valley long beach / 562 antelope valley

search for:	in: casual encounters	<input type="button" value="Search"/>	<input type="checkbox"/> only search titles
Poster's Age: min	max		<input type="checkbox"/> has image

[ Sat, 14 Nov 12:57:47 ]

[search keywords : mw4w, w4m, w4w, m4w, m4m, t4m  
 [ report suspected exploitation of minors ] [ parental control softw  
 [ PERSONAL SAFETY TIPS ] [ AVOIDING SCAMS & FRAUD ] [success s

**Sat Nov 14**

Fuck me in the Ass - m4m - 34 - (sgv) pic

beautiful girl ISO openminded man - w4m - 22 - (los angeles )

Men who want to be blown/swallowed by a guy - w4m - 25 - (LB 4th Temple)

Settling Down Didnt Work for Him - w4m - 37 - (Long Beach) pic

Would love to make love to an Indian Woman.. - m4w - 46 - (SFV)

Latino looking for Sexy passable T - m4t - pic

Hit Me Up for Hot Sex - w4m - 22 - (los angeles )

Asian Transex - t4m - 27 - (here or Santa Monica) pic

Hot guy with a kinky fantasy - m4w - 28 - (west la)

any women up for some cam fun? - m4w - (so ca)

Let's look for love in the wrong places together - w4m - 22 - (los angeles)

STR8 MEN WHIO WANT TO BE SERVICED/SWALLOWED BY A GAY GUY - m4m - 25 - (Temple/7th LB)

\*\*\*\*\*iso dedicated BALL LICKER for now\*\*\*\*\* - 30 - (Pasadena) pic

Lonely woman looking for a spark!! - w4m - 22 -

can u make me squirt? - w4m - 22 - (los angeles)

brother sister fucking - m4w - (silverlake)

hot white guy needs a Massage from cute TS Girl - m4t - 35 - (where you are)

>>>>>> SMALL BBW WITH ROUND BUBBLE BUTT <<<<<< - - 23 - (LA)

you rang? - w4m - 22 - (los angeles)

spend the day SITTING on my FACE watch TV Blazing Away? - m4w - (On-my-tongue-ville)

What Goes Around Comes Around Right? - w4m - 28 - (Antelope Valley) pic

200 bucks for a bj - m4t - (LA)

Blue Light Special J - w4m - 22 - (los angeles)

4 the BEST experience life has 2 offer - w4m - 21 - (Hollywood ) pic

hott itmes with us - mw4mw - 233 - (high desert) pic

Peter Eater - w4m - 22 - (los angeles)

Going to train and looking to get brain, service this muscled stud - m4m - 23 - (Northridge) pic

cute 20 year old male - m4w - 20 - (burbank)

Looking for some NSA fun - m4w - 43 - (Century City, LA)

40ish ISO match - m4t - 40 - (So.Bay travel to you)

GL hung Persian looking for a sexy CD or T girl today - m4t - 35 - (ESFV)

Exhibitionist looking for partner - w4m - 22 - (los angeles )

Girlz ....U ever vissit the Capitol !! - m4t - 34 - (Hung&Latino from Sac.) pic

Would love to be nasty on this sunny Saturday - m4t - 27 - (Hollywood & Highland) pic

latina sexy looking 4 fun any young guy 4 my - t4m - 27 - (ucs,wilshire,metro station normandie LA) pic

bi here iso scat buddies /hairy bush balls/ call me - m4m - 48 - (long beach)

Straight showoff exhibitionist ISO audience - m4m - 40 - (West LA)

Looking for mature with Xtra large ballsack - m4m - 36 - (sfv) pic

LET IT ALL OUT!!! - m4w - pic

BIG ASSES APPLY WITHIN - m4m - 30 - (Pico)

Let's Invent Something New - w4m - 22 - (los angeles )

free massage - w4m - 30 - (west LA, hills, hollywood, venice) pic

200\$ for a bj - m4w - (LA)

19 yr. old seeks first time with BBW - m4w - 19 - (Los Angeles)

It's a long shot, but does anyone want to party? - 34 - (Downtown adjacent) pic

I have an idea....BBW or SSBBW needed! - m4w - 30 - (LA/OC area) pic

Teen seeks gentleman 4 mutual fun - m4m - 19 - (Hollywood)

RIM ME! - m4m - 38 - (broadway & Junipero) pic

Starp-on Dildo Play Wanted - m4w - pic

Cute coed wants some! - w4m - 22 - (los angeles)

BLACK ASSSTRETCHER - m4t - 30 - (Pico)

My Hero? The Staminator - w4m - 22 - (los angeles )

Latin Couple - mw4mw - 32 - (Los Angeles) pic

I'm cute and fun!! - w4m - 28 - (Pawnee)

BBW WHERE U AT? - m4w - pic

LETS TALK ABOUT SEX - w4m - 22 - (los angeles)

WANNA RELEASE SOME STRESS - m4w - pic

Dead fucks need not apply - w4m - 22 - (los angeles)

Real girl seeks real man - w4m - 22 - (los angeles)

Married no one needs to know - m4w - 45 - (Pasadena) pic

Need prince Albert - m4m - (Gardena,Torrance,compton,inglewood,la)

Willing to provide relief - m4m - 52 - (Lakewood)

Am I sexy? Guilty as Charged!! - w4m - 22 - (los angeles)

Visiting LA looking for married couple - m4mw - 45 - (West Hollywood) pic

"""""" Get Together Soon with Curvy Mix-Asian"""""" - w4m - 23 - (Los Angeles)

ISO rocking rabbit - w4m - 22 - (los angeles )

playful, perky and really, really provocative - w4m - 22 - (los angeles)

I have some fantasies can you help? - w4m - 22 -

Looking for a couple nasty kinky guys to fuck me in the morning - m4mm - 50 -

beautiful and hot. latina ts - t4m - 25 - (hollywood/ and little los feliz) pic

\*\*\*\*\*FEVER\*\*\*\*\* - w4m - 22 - (los angeles)

XtrememscleM4M - m4m - 36 - (Grtcr Hllywd) pic

Want a TS or Cute and sexy CD for Now. - m4t - 40 - (Los Angeles) pic

hot shemale wanted - m4t - (venice) pic

Sex Under the Influence = SUI - w4m - 22 - (los angeles)

Swing Party Tonight. Couples & Single Girls - mw4mw - (SFV)  
Plenty of Dead Presidents Available - m4w - 45 - (San Fernando Valley)  
you like being like this? - m4w - pic  
Trangendered girl looking to get her ears peirced. :) - t4m - 19 - (661)  
a simple guy - m4w - 33 -  
SAFE AND FUN - m4m - 42 - (HOLLYWOOD) pic  
How in the fuck does a girl hit a dry spell?!? - w4m - 26 - (Silver Lake)  
Professional, discreet guy visiting LA - m4w - 45 - (West Hollywood) pic  
College student looking for fun - m4m - 21 - (Downtown la) pic  
sexy bi looing for sexy and kinky girls - m4w - 29 - (los angeles) pic  
f toilet slave - m4w - 45 - (wla)  
When was the LAST time you were treated in bed like a queen? - m4w - pic  
SBF ISO WOMAN TO FILM ME - w4w - 25 - (LA)  
Want to be a couple's Gf? - mw4w - (We host (-818-through-661-)) pic  
smooth azn/ltm bottom lookin for hung tops - m4m - 29 - (la) pic  
Looking for middle of day fun - m4w - 34 - (Southbay) pic  
Steady Mutually Beneficial Arrangement - w4m - 30 -  
UR CRAVING - w4m - 36 - (LOS ANGELES) pic  
MF GF LEFT ME!!!! - m4w - pic  
Do you love giving head? - m4w - (WLA)  
God's Gift to you - m4w - 26 - (SFV) pic  
This GIRL'S GONE WILD - w4m - 22 - (los angeles)  
Lets Party Tonight, Looking for a Fun Loving Girl - m4w - 25 - (west la) pic  
Daytime ts in heat... - t4m - 26 - (hwood) pic  
Latino hosting for ASIANS+LATINOS - m4m - 29 - (EAST LA)

next 100 postings











at&t

SCOTT PA

Page 2 of 6  
Account Number  
Billing Date Apr 25 2009

REDACTED

Plans and Services

Surcharges and Other Fees - Continued

1. State Regulatory Fee	.05
2. Federal Universal Service Fee	.49
Total Surcharges and Other Fees	5.30

Government Fees and Taxes

3. CA High Cost Fund Surcharge - A	.03
4. CA High Cost Fund-B and CA Advanced Svc Fund	.13
5. California Teleconnect Fund Surcharge	.02
6. Universal Lifeline Telephone Service Surcharge	.30
7. CA Relay Service and Communications Devices Fund	.05
8. 9-1-1 Emergency System	.14
9. Federal	.94
Total Government Fees and Taxes	1.61

Total Plans and Services 32.97

AT&T Long Distance

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Account Summary

Description	7.52
Charges for April	7.52
Total Account Summary Charges	7.52

Invoice Summary

(as of APRIL 13, 2009)

Current Charges	5.00
Service Charges	.00
Credits and Adjustments	.00
Call Charges	2.46
Surcharges and Other Fees	.05
Government Fees and Taxes	7.52
Total Invoice Summary	7.52

Service Charges

Monthly Service Charges

Type of Service	Period	Qty	
10. Nationwide Call 120 Prd	APR 11 to MAY 10	1	5.00
Total Monthly Service Charges			5.00
Total Service Charges			5.00

Call Charges - Mar 11th thru Apr 10th

Calls for:

Domestic

Item	No.	Date	Time	Place Called	Number	Code	Min	
	11.	3-09						.00
	12.	3-09						.00
	13.	3-09						.00
	14.	3-11						.00
	15.	3-11						.00
	16.	3-18	024A	SNFC RT-EVCA	415 566-6394	000	6:00	.00
	17.	3-18						.00
	18.	3-18						.00
	19.	3-24						.00
	20.	3-24						.00
	21.	3-25						.00
	22.	3-25						.00
	23.	3-25						.00
	24.	3-25						.00
	25.	3-25						.00
	26.	3-26						.00
	27.	4-05						.00
	28.	4-05						.00
	29.	4-06						.00
	30.	4-08						.00
	31.	4-08						.00

Subtotal Domestic Calls for 661-588-

Total Domestic Calls for 661-588-

Total Calls for 661-588-

Total Call Charges

Surcharges and Other Fees

Description	1.99
32. Carrier Cost Recovery Fee	.46
33. Fed Universal Service Fund	.01
34. CA State Regulatory Fee	2.46
Total Surcharges and Other Fees	2.46

Government Fees and Taxes

Description	.01
35. CA High Cost Fund B and CA Advanced Svc Fund	.01
36. CA Relay Service & Comm. Devices Fund	.01
37. CA State Emergency Telephone Users (911) Tax	.01
38. CA Teleconnect Fund (0.94%)	.01

REDACTED

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> craigslist customer service

>

> \*\*\*\*\*ORIGINAL TEXT\*\*\*\*\*

>

> > Date: Wed, 18 Mar 2009 09:57:41 -0700

> > From: Scott P. [redacted] <mi [redacted]@hotmail.com>

**REDACTED**

> > To: <abuse@craigslist.org>

> > Subject: 911

> >

> >

> > Per a conversation with one of your employees at 415-566-6394 I am writing to request the information of the poster for an add on your casual encounters m4m on 3-16-09 at approximately 10:19 pm with the ID# 1078547498 or pers-4eakp-1078547498@craigslist.org. The poster of this add fraudulently and maliciously posted my name and the home/work number of myself and my wifes home preschool phone number. We have logged and are continuing to log the vile phone calls that have come to our preschool beginning on 3-16-09 until current. We have contacted the local law enforcement as well as reported this information to the proper government agencies for child pornography and abuse. I am requesting the information of the individual who posted my name and phone number as well as a pornographic picture on your site and would like an immediate response.

> >

> >

> >

> > My contact information is mil [redacted]@hotmail.com or 661-588-[redacted]

> >

> > Thank you, Scott

> >

> >

> >

> >

> >

> >

> > Windows Live™ Contacts: Organize your contact list.

> > [http://windowslive.com/connect/post/marcusatmicrosoft.spaces.live.com-Blog-cns!503D1D86EBB2B53C!2285.entry?ocid=TXT\\_TAGLM\\_WL\\_UGC\\_Contacts\\_032009](http://windowslive.com/connect/post/marcusatmicrosoft.spaces.live.com-Blog-cns!503D1D86EBB2B53C!2285.entry?ocid=TXT_TAGLM_WL_UGC_Contacts_032009)

---

Windows Live™: Keep your life in sync. Check it out.



**REDACTED**

---

From: ml [REDACTED]@hotmail.com  
To: \*REDACTED\*  
Subject: RE: [bakersfield] 911  
Date: Mon, 23 Mar 2009 14:54:27 -0700

Uncle Troy,

I **don't recognize** any of the identified people! I just got home from the Hell Hole (work) and I will be giving a copy of all the evidence I have to my Workers Compensation Attorney today. If you can identify the unidentified callers that would be most excellent. Do you think the phone company would have the information on all the private calls that come in with a specific time and date?

Thank you,  
Scott

---

Date: Mon, 23 Mar 2009 09:26:06 -0700  
From: \*REDACTED\*  
Subject: Re: FW: [bakersfield] 911  
To: ml [REDACTED]@hotmail.com

Hi Scotty. Do you recognize any of the identified people? I could try to identify the unidentified callers. What's happened since we last spoke?

Troy

--- On Sun, 3/22/09, Scott P [REDACTED]@hotmail.com wrote:

From: Scott P [REDACTED]@hotmail.com  
Subject: FW: [bakersfield] 911  
To: \*REDACTED\*  
Date: Sunday, March 22, 2009, 5:01 AM

Hello Uncle Troy,

Below you will find the information that was sent to me from craigslist. I am also attaching the text I received from one of the numbers 1-559-308-1400 wireless number. I received mostly private caller calls; however I will list the phone numbers that I did receive.

1. Grewal Gurpreet 661-304-3696
2. John Hulbert 661-932-7327
3. Rosina, Soto 661-348-6623
4. Johnny Vasquez 661-865-9854
5. Unknown name 661-246-5305
6. Avina Julio 661-808-8525

- 7. Mathew Park 661-345-2954
- 8. unknown name 661-310-0802 called about 3 times
- 9. Unknown name 661-369-6227
- 10. unknown name 661-342-4640 called 2 times
- 11. Brandon Obeso 661-348-9358 called 2 times
- 12. Wireless number 661-586-0182
- 13. Unknown name 661-599-1114 This person called several times (Uncle Troy This person might be privy to whomever made these postings).
- 14 Pat Stenger 832-715-0764 called 2 times
- 15 Most calls that I received were under private number.

I appreciate you taking your time to look this information up Uncle Troy. My home phone number is 661-588- and my work cell number is 661-333-6270.

Thank You Uncle Troy,  
Scott W P

**REDACTED**

> Date: Sat, 21 Mar 2009 18:32:40 -0700  
 > From: abuse@craigslist.org  
 > To: mi @hotmail.com  
 > Subject: RE: [bakersfield] 911

>  
 > Since these posts appear to be an attempt to impersonate you for the  
 > purpose of harassment, we can give you the details we have about them.  
 >  
 > (The information shown below represents the complete record in our system  
 > for these posts. We don't have the poster's name, phone number, or  
 > address, but it is likely that law enforcement authorities will be able to  
 > use this information to identify the poster.)

\*\*\*\*\*

>  
 > PostingID: 1078547498  
 > ReplyEmail: sp @hotmail.com  
 > IPaddress: 99.144.94.68  
 > CreationDate: 2009-03-16 22:17:41 (Pacific)  
 > PostedDate: 2009-03-16 22:19:31 (Pacific)  
 > ModifiedDate: 2009-03-18 10:04:11 (Pacific)  
 > Area: bakersfield  
 > GeographicArea: n/w bakersfield  
 > Category: casual encounters  
 > PostingTitle: seeking a hot stud for first timer - m4m  
 > PriceOrAge: 30  
 > EmailDisplay: anonymized email address  
 > InvoiceItemID: 0  
 > CurrentPostStatus: staff deleted  
 > PostingBody  
 > =====

>  
 > recently divorced from my wife, have come to terms with my homo sexuality,  
 > and need someone to teach my the right way, and be gentle at the same  
 > time. age ,race not important, must be disease and drug free. my place  
 > or yours. scott six six one five eight eight

>  
>

\*\*\*\*\*

>  
> PostingID: 1081628758  
> ReplyEmail: sp @hotmail.com  
> IPAddress: 99.30.57.114  
> CreationDate: 2009-03-18 22:07:03 (Pacific)  
> PostedDate: 2009-03-18 22:08:37 (Pacific)  
> ModifiedDate: 2009-03-20 09:09:40 (Pacific)  
> Area: bakersfield  
> GeographicArea: 08 bako  
> Category: casual encounters  
> PostingTitle: a hard man is good to find! - m4m  
> PriceOrAge: 33  
> EmailDisplay: anonymized email address  
> InvoiceItemID: 0  
> CurrentPostStatus: staff deleted  
> PostingBody

**REDACTED**

> =====

>  
> seeking a man between 21-48 for fun and good times!. must be in decent  
> shape, no drama, diseases. you will not be disapointed! hope to hook up  
> soon!!! six six one three three three six two seven zero.....

>  
>

\*\*\*\*\*

>  
> Regards,  
> craigslist customer service  
>  
> \*\*\*\*\*ORIGINAL TEXT\*\*\*\*\*

>  
>> Date: Fri, 20 Mar 2009 10:58:20 -0700  
>> From: Scott P <mi @hotmail.com>  
>> To: <abuse@craigslist.org>  
>> Subject: RE: [bakersfield] 911

>>  
>>

>> I am requesting the complete records in your system for this particular post so that I  
may give them to the District Attorney as well as my lawyer and would appreciate your  
immediate response.

>>  
>>  
>>

>> Thank you Scott

>>

>>> Date: Fri, 20 Mar 2009 09:13:50 -0700  
>>> From: abuse@craigslist.org  
>>> To: mi @hotmail.com  
>>> Subject: Re: [bakersfield] 911

>>>

>>> That post has been removed from the listings.

>>>

>>>

>>> Regards,



**REDACTED**

> > > craigslist customer service

> > >

> > > \*\*\*\*\*ORIGINAL TEXT\*\*\*\*\*

> > >

> > > > Date: Fri, 20 Mar 2009 05:16:39 -0700 (PDT)

> > > > From: Scott P <mi @hotmail.com>

> > > > To: <abuse@craigslist.org>

> > > > Subject: [bakersfield] 911

> > > >

> > > > On March 18, 2009 I submitted a request for you to remove a fraudulent posting by ID# 1078547498, which you did, and I would like to say thank you! However, at 10:08pm on the same day March 18, 2009 another post was made using my name and a different phone number, this time it was my work cell phone number. This is the second attempt on your site to impersonate me and maliciously post my name and contact information. I have contacted the District Attorneys office who is already researching the information from the previous post and I would like the information of the individual who posted the most resent post on March 18, 2009 at 10:08pm with the contact information of pers-ng6fr-1081628758@craigslist.org ID# 1081628758 under casual encounters m4m with the title A hard man is good to find! I would also like to request that you stop allowing any postings to be made under my name or my phone numbers without verbal consent from me first.

> > > >

> > > > My contact information is mi @hotmail.com or 661-588-

> > > >

> > > > Thank you, Scott

> > > >

> > > >

> > > >

> > > > https://team.craigslist.org/cgi-team/search.postings.cgi?dbToUse=live&postingID=1078547498&fs=y

> > > > https://team.craigslist.org/cgi-team/search.postings.cgi?dbToUse=live&postingID=1081628758&fs=y

> > > > https://team.craigslist.org/cgi-team/search.postings.cgi?dbToUse=live&postingID=1081628758&fs=y

> > > > --

> > > >

> > > > X-User-IP: 98.150.19.152

> > > > Form Key: S2xiLW0dBK7pxIUg

> > > > User-Agent: Mozilla/4.0 (compatible; MSIE 6.0; Windows NT 5.1; SV1; GTB5; .NET CLR 1.1.4322; .NET CLR 2.0.50727)

> > > >

> > > >

> >

> >

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Windows 7: It helps you do more. [Explore Windows 7.](#)





FW: [bakersfield] 911

From: Scott P (mi @hotmail.com)

Sent: Fri 3/20/09 4:35 PM

To: **REDACTED**

> Date: Fri, 20 Mar 2009 09:13:50 -0700

> From: abuse@craigslist.org

> To: mi @hotmail.com

> Subject: Re: [bakersfield] 911

>

> That post has been removed from the listings.

>

>

> Regards,

> craigslist customer service

>

> \*\*\*\*\*ORIGINAL TEXT\*\*\*\*\*

>

> > Date: Fri, 20 Mar 2009 05:16:39 -0700 (PDT)

> > From: Scott P <mi @hotmail.com>

> > To: <abuse@craigslist.org>

> > Subject: [bakersfield] 911

> >

> > On March 18, 2009 I submitted a request for you to remove a fraudulent posting by ID# 1078547498, which you did, and I would like to say thank you! However, at 10:08pm on the same day March 18, 2009 another post was made using my name and a different phone number, this time it was my work cell phone number. This is the second attempt on your site to impersonate me and maliciously post my name and contact information. I have contacted the District Attorneys office who is already researching the information from the previous post and I would like the information of the individual who posted the most recent post on March 18, 2009 at 10:08pm with the contact information of pers-ng6fr-1081628758@craigslist.org ID# 1081628758 under casual encounters m4m with the title A hard man is good to find! I would also like to request that you stop allowing any postings to be made under my name or my phone numbers without verbal consent from me first.

> >

> > My contact information is mi @hotmail.com or 661-588-

> >

> > Thank you, Scott

> >

> >

> >

> > <https://team.craigslist.org/cgi-team/search.postings.cgi?dbToUse=live&postingID=1078547498&fs=y>

> > <https://team.craigslist.org/cgi-team/search.postings.cgi?dbToUse=live&postingID=1081628758&fs=y>

> > <https://team.craigslist.org/cgi-team/search.postings.cgi?dbToUse=live&postingID=1081628758&fs=y>

> > --

> >

> > X-User-IP: 98.150.19.152

> > Form Key: S2xiLW0dBK7pxUg

**REDACTED**





at&t

REDACTED

SOFT PI

Page 2 of 6
Account Number
Billing Date Apr 25, 2009

Plans and Services

Table with 2 columns: Description and Amount. Includes sections for Surcharges and Other Fees, Government Fees and Taxes, and Total Plans and Services.

AT&T Long Distance

Important Information
Message Regarding Terms & Conditions:
To view your Terms & Conditions for AT&T Long Distance...

Account Summary table with 2 columns: Description and Amount. Shows charges for April totaling 7.52.

Invoice Summary table with 2 columns: Description and Amount. Shows current charges, credits, and total invoice summary of 7.52.

Service Charges table with 4 columns: Type of Service, Period, Qty, and Amount. Shows monthly service charges for a Nat'lwide Call 120 Prd.

Call Charges - Mar 11th thru Apr 10th

Call Charges table with 8 columns: Item, Date, Time, Place Called, Number, Code, Min, and Amount. Lists individual call items and totals for domestic calls.

Surcharges and Other Fees table with 2 columns: Description and Amount. Lists carrier cost recovery, universal service fund, and state regulatory fees.

Government Fees and Taxes table with 2 columns: Description and Amount. Lists CA High Cost Fund, relay service, and emergency telephone fees.

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Thank you for being a valued AT&T customer! When you send us a check as payment, you give a one-time authorization to clear your check electronically. Electronic payments may clear the same day we receive the payment. Your e-check will not be returned. If we cannot process the transaction electronically, we will present a hard check for payment. If you do not wish to participate in AT&T's check conversion program, please call 1 800 255-3080. If you wish to save time and avoid late payment charges, we encourage you to use our online payment service. Please visit www.att.com to paperless your checking account or credit card. It's easy, secure, and convenient!







FW: 911

From: Scott P (mi @hotmail.com)

Sent: Wed 3/18/09 11:56 AM

To: **REDACTED**

> Date: Wed, 18 Mar 2009 10:04:10 -0700

> From: abuse@craigslist.org

> To: mil @hotmail.com

> Subject: Re: 911

>

> That post has been removed from the listings.

>

> Since this post appears to be an attempt to impersonate you for the  
> purpose of harassment, we can give you the details we have about it.

>

> (The information shown below represents the complete record in our system  
> for this post. We don't have the poster's name, phone number, or address,  
> but it is likely that law enforcement authorities will be able to use this  
> information to identify the poster.)

>

> \*\*\*\*\*

>

> PostingID: 1078547498  
> ReplyEmail: sp @hotmail.com  
> IPAddress: 99.144.94.68  
> CreationDate: 2009-03-16 22:17:41 (Pacific)  
> PostedDate: 2009-03-16 22:19:31 (Pacific)  
> ModifiedDate: 2009-03-18 10:04:11 (Pacific)  
> Area: bakersfield  
> GeographicArea: n/w bakersfield  
> Category: casual encounters  
> PostingTitle: seeking a hot stud for first timer - m4m  
> PriceOrAge: 30  
> EmailDisplay: anonymized email address  
> InvoiceItemID: 0  
> CurrentPostStatus: staff deleted  
> PostingBody

> =====

>

> recently divorced from my wife, have come to terms with my homo sexuality,  
> and need someone to teach my the right way, and be gentle at the same  
> time. age ,race not important, must be disease and drug free. my place  
> or yours. scott six six one five eight eight

>

> \*\*\*\*\*

>

> Regards,

**REDACTED**







**REDACTED**

**Plans and Services**

Surcharges and Other Fees - Continued	
1. State Regulatory Fee	.05
2. Federal Universal Service Fee	.49
<b>Total Surcharges and Other Fees</b>	<b>1.30</b>
Government Fees and Taxes	
1. CA High Cost Fund Surcharge - A	.03
4. CA High Cost Fund-B and CA Advanced Svc Fund	.13
5. California Teleconnect Fund Surcharge	.02
6. Universal Lifeline Telephone Service Surcharge	.30
7. CA Relay Service and Communications Devices Fund	.05
8. 9-1-1 Emergency System	.14
9. Federal	.94
<b>Total Government Fees and Taxes</b>	<b>1.61</b>
<b>Total Plans and Services</b>	<b>32.97</b>

**AT&T Long Distance**

**Important Information**  
 Message Regarding Terms & Conditions:  
 To view your Terms & Conditions for AT&T Long Distance, access [www.att.com/public\\_affairs](http://www.att.com/public_affairs) or call 1 888 225-4530 to have a copy mailed.

Account Summary	
Description	
Charges for April	7.52
<b>Total Account Summary Charges</b>	<b>7.52</b>

Invoice Summary	
(as of APRIL 13, 2009)	
Current Charges	
Service Charges	5.00
Credits and Adjustments	.00
Call Charges	.00
Surcharges and Other Fees	2.46
Government Fees and Taxes	.05
<b>Total Invoice Summary</b>	<b>7.52</b>

Service Charges			
Monthly Service Charges			
Type of Service	Period	Qty	
10. Nationwide Call 120 Prf	APR 11 to MAY 10	1	5.00
<b>Total Monthly Service Charges</b>			<b>5.00</b>
<b>Total Service Charges</b>			<b>5.00</b>

**Call Charges - Mar 11th thru Apr 10th**  
 Calls for:

Domestic							
Line	No.	Date	Time	Place Called	Number	Code	Min
	11.	3-09					.00
	12.	3-09					.00
	13.	3-09					.00
	14.	3-11					.00
	15.	3-11					.00
	16.	3-18		924A SHFC NY-EVCA	415 565-6394	000	6:00
	17.	3-18					.00
	18.	3-18					.00
	19.	3-24					.00
	20.	3-24					.00
	21.	3-25					.00
	22.	3-25					.00
	23.	3-25					.00
	24.	3-25					.00
	25.	3-25					.00
	26.	3-26					.00
	27.	4-05					.00
	28.	4-05					.00
	29.	4-05					.00
	30.	4-09					.00
	31.	4-09					.00
Subtotal Domestic Calls for 661-588- .00							
Total Domestic Calls for 661-588- .00							
Total Calls for 661-588- .00							
<b>Total Call Charges</b> .00							

Surcharges and Other Fees	
Description	
32. Carrier Cost Recovery Fee	1.99
33. Fed Universal Service Fund	.46
34. CA State Regulatory Fee	.01
<b>Total Surcharges and Other Fees</b>	<b>2.46</b>

Government Fees and Taxes	
Description	
35. CA High Cost Fund B and CA Advanced Svc Fund	.01
36. CA Relay Service & Comm. Device Fee	.01
37. CA State Emergency Telephone Users (911) Tax	.11
38. CA Teleconnect Fund (0.00%)	.00

Thank you for being a valued AT&T customer! When you send us a check as payment, you give us one line of information to clear your check electronically. Electronic payments may clear the same day we receive the payment. Your check will not be returned. If we cannot post the transaction, we will contact you. Please do not cash or deposit your check in AT&T's check conversion program. To have a copy of your check for payment, if you do not wish to participate in AT&T's check conversion program, please call 1 800 255-3000. You will save time and money by using our payment program. Please see [www.att.com/stoppaper](http://www.att.com/stoppaper) for more information on our check conversion program. If you have a check conversion program, please see [www.att.com/stoppaper](http://www.att.com/stoppaper) for more information on our check conversion program. If you have a check conversion program, please see [www.att.com/stoppaper](http://www.att.com/stoppaper) for more information on our check conversion program.





RE: [abuse-harass] 911

**REDACTED**

From: **craigslist** (abuse@craigslist.org)

Sent: Sat 4/18/09 7:40 PM

To: Scott P (mi @hotmail.com)

Those posts have been removed from the listings, additional steps have been taken that may help prevent this issue from happening again.

Since these posts appear to be an attempt to impersonate you for the purpose of harassment, we can give you the details we have about them.

(The information shown below represents the complete record in our system for these posts. We don't have the poster's name, phone number, or address, but it is likely that law enforcement authorities will be able to use this information to identify the poster.)

\*\*\*\*\*

----- TEAMREAD ROW 1

PostingID: 1128418184  
ReplyEmail: sp @hotmail.com  
IPAddress: 99.52.242.39  
CreationDate: 2009-04-18 09:42:38 (Pacific)  
PostedDate: 2009-04-18 09:43:55 (Pacific)  
ModifiedDate: 2009-04-18 19:39:36 (Pacific)  
Area: bakersfield  
GeographicArea: N/W bako  
Category: general  
PostingTitle: spa...free!! u pick up!  
EmailDisplay: no email address shown  
InvoiceItemID: 0  
CurrentPostStatus: staff deleted  
PostingBody  
=====

cal spa only 2 years old, works all accesories, free!, haas to be picked  
up this weekend!, house forclosed..moving , off of  
olive drive, heavy bring lots of help..I have a bad back  
<br>

<br>

<br>

<br>

<br>

<br>

----- TEAMREAD ROW 2

PostingID: 1128449696  
ReplyEmail: sp @hotmail.com  
IPAddress: 99.52.242.39  
CreationDate: 2009-04-18 10:01:10 (Pacific)  
PostedDate: 2009-04-18 10:01:49 (Pacific)  
ModifiedDate: 2009-04-18 19:39:36 (Pacific)  
Area: bakersfield  
GeographicArea: n/w bakersfield  
Category: cars & trucks - by owner  
PostingTitle: 99 mitsubishi eclipse wont pass smog  
PriceOrAge: 500  
EmailDisplay: no email address shown  
InvoiceItemID: 0  
CurrentPostStatus: staff deleted  
PostingBody

**REDACTED**

=====  
Mitsubishi eclipse runs good, needs tags smog, have a clean title, has to go this weekend..moving out of state...come pick it up!..cash only I will not hold this car, first come with the cash gets it!  
off of olive drive.

----- TEAMREAD ROW 3  
-----

PostingID: 1128503286  
ReplyEmail: sp @hotmail.com  
IPAddress: 99.52.242.39  
CreationDate: 2009-04-18 10:33:09 (Pacific)  
PostedDate: 2009-04-18 10:33:40 (Pacific)  
ModifiedDate: 2009-04-18 19:39:36 (Pacific)  
Area: bakersfield  
GeographicArea: N/W bakersfield  
Category: cars & trucks - by owner  
PostingTitle: 65 Chevy Elcamino  
PriceOrAge: 1000  
EmailDisplay: no email address shown  
InvoiceItemID: 0  
CurrentPostStatus: staff deleted  
PostingBody

=====  
nice 1965 camino with a 327 small block,350 turbo auto., run's/drives great, needs paint/interior work, cash only!!! no low ballers! call 661-588- or 661 333-6270

----- TEAMREAD ROW 4  
-----

PostingID: 1128518256  
ReplyEmail: sp @hotmail.com  
IPAddress: 99.52.242.39  
CreationDate: 2009-04-18 10:42:15 (Pacific)  
PostedDate: 2009-04-18 10:42:48 (Pacific)  
ModifiedDate: 2009-04-18 19:39:36 (Pacific)  
Area: bakersfield  
GeographicArea: N/W Bakersfield

Category: household  
PostingTitle: free! washer/dryer,all work great  
PriceOrAge:  
EmailDisplay: no email address shown  
InvoiceItemID: 0  
CurrentPostStatus: staff deleted  
PostingBody  
=====

**REDACTED**

free sears/kenmore washer and dryer, clean, all work great! owners left when they moved out...come pick them up this weekend only!, I will be in and out all of this weekend if I am not there please wait!....  
off of olive drive

\*\*\*\*\*

Regards,  
craigslist customer service

\*\*\*\*\*ORIGINAL TEXT\*\*\*\*\*

> Date: Sat, 18 Apr 2009 12:34:00 -0700  
> From: Scott P <mi @hotmail.com>  
> To: <abuse@craigslist.org>  
> Subject: RE: [abuse-harass] 911  
>  
>  
> I have four post ID Numbers just this morning. They are 1128503286, 1128449696, 1128418184, and 1128518256. I would appreciate your help in giving me all IP addresses that have used my address @ my home phone number is 661-588- and someone has posted my work cell # 661-333-6270. Can you please send this to me ASAP!  
>  
> Thank you,  
>  
> Scott P.  
>

> > Date: Sat, 18 Apr 2009 12:24:17 -0700  
> > From: abuse@craigslist.org  
> > To: mi @hotmail.com  
> > Subject: Re: [abuse-harass] 911  
> >  
> > If possible, can you send us the post ID numbers for these ads?  
> >  
> >  
> > Regards,  
> > craigslist customer service  
> >

> > \*\*\*\*\*ORIGINAL TEXT\*\*\*\*\*  
> >

> > > Date: Sat, 18 Apr 2009 09:26:59 -0700 (PDT)  
> > > From: Scott P <mi @hotmail.com>  
> > > To: <abuse@craigslist.org>  
> > > Subject: [abuse-harass] 911  
> > >  
> > > There has been several postings about me and my family posted here on

craigslist. I already have a case # with the Bakersfield Police for 2 of the postings to find out who is harassing me and my family. The last posting was posted on or about April 16, 2009 about me having a 1967 Camero for sale and that my house was going into forecloser(not true). This person(s) whom is posting these untrue events about me is doing it to cause harm (harass) to my family. My wife had to leave our home on Friday, April 17, 2009 when 2 men arrived at our home to ask about a 1967 Camero and about our home that is "NOT" going into forcloser. This has made my wife extremely scared and now we will have to once again call the Bakersfield Police to inform them about someone using my information to cause harm. I would appreciate you sending me any and all information IP address on the person who posted this last posting using my phone number 661-588- and my name Scott.

> > >

> > > --

> > >

> > > X-User-IP: 98.150.19.152

> > > Form Key: qR5l4wak3Oz2lQ3e

> > > User-Agent: Mozilla/4.0 (compatible; MSIE 6.0; Windows NT 5.1; SV1; GTB5; .NET CLR 1.1.4322; .NET CLR 2.0.50727)

> > >

> > >

>

>

> Rediscover Hotmail@: Now available on your iPhone or BlackBerry

>

[http://windowslive.com/RediscoverHotmail?ocid=TXT\\_TAGLM\\_WL\\_HM\\_Rediscover\\_Mobile2\\_042009](http://windowslive.com/RediscoverHotmail?ocid=TXT_TAGLM_WL_HM_Rediscover_Mobile2_042009)

**REDACTED**





---

**REDACTED**

----- Original Message -----

From: mi @hotmail.com  
To: \*REDACTED\*  
Sent: Saturday, April 18, 2009 11:53 AM  
Subject: spa...free!! u pick up! (N/W bako)

mi @hotmail.com has forwarded you this craigslist.org posting.  
Please see below for more information.

---

**spa...free!! u pick up!**

Reply to: (see message body)  
Date: 2009-04-18, 9:42AM

cal spa only 2 years old, works all accesories, free1, haas to be picked up this weekend!, house  
forclosed..moving ;, off of olive drive, heavy bring lots of help..I have a bad back

- Location: N/W bako
- it's NOT ok to contact this poster with services or other commercial interests

Original URL:<http://bakersfield.craigslist.org/for/1128418184.html>

---

*this craigslist posting was forwarded to you by someone using our  
email-a-friend feature - if you want to prevent these, please go to:  
<http://www.craigslist.org/cgi-bin/te/vB3c0NHbA52brFmYyJnLvNmLAAQbj>*

---



**REDACTED**

----- Original Message -----

From: mi @hotmail.com  
To: \*REDACTED\*  
Sent: Saturday, April 18, 2009 4:30 PM  
Subject: table /6 chairs/ couch...free!! (n/w bako)

mi @hotmail.com has forwarded you this craigslist.org posting.  
Please see below for more information.

---

**table /6 chairs/ couch...free!!**

Reply to: (see message body)  
Date: 2009-04-18, 9:51 AM

new tenants moving in on mon. all furnitire has to be moved this weekend!!!. prior renters left, lot's fo nice furnitre, first come first serve!m, bring your truck and help, I can not do any lifting...  
off of olive drive...

- Location: n/w bako
- it's NOT ok to contact this poster with services or other commercial interests

Original URL:<http://bakersfield.craigslist.org/fuo/1128433992.html>

---

*this craigslist posting was forwarded to you by someone using our  
email-a-friend feature - if you want to prevent these, please go to:  
<http://www.craigslist.org/cgi-bin/te/vB3c0NHbA52brFmYyJnLvNmLAAQbj>*

---



---

— Original Message —

From: mi @hotmail.com  
To: \*REDACTED\*  
Sent: Saturday, April 18, 2009 11:58 AM  
Subject: 99 mitsubishi eclipse wont pass smog - \$500 (n/w bakersfield)

**REDACTED**

mi @hotmail.com has forwarded you this craigslist.org posting.  
Please see below for more information.

---

## 99 mitsubishi eclipse wont pass smog

Reply to: (see message body)  
Date: 2009-04-18, 10:01AM

Mitsubishi eclipse runs good, needs tags smog, have a clean title, has to go this weekend..moving out of state...come pick it up! I..cash only I will not hold this car, first come with the cash gets it!  
off of olive drive.

- Location: n/w bakersfield
- it's NOT ok to contact this poster with services or other commercial interests

Original URL: <http://bakersfield.craigslist.org/cto/1128449696.html>

---

*this craigslist posting was forwarded to you by someone using our  
email-a-friend feature - if you want to prevent these, please go to:*  
<http://www.craigslist.org/cgi-bin/te/vB3c0NHbA52brFmYyJnLvNmLAAObj>

---



---

**REDACTED**

--- Original Message ---

From: mi @hotmail.com  
To: \*REDACTED\*  
Sent: Saturday, April 18, 2009 11:46 AM  
Subject: 65 Chevy Elcamino - \$1000 (N/W bakersfield)

mi @hotmail.com has forwarded you this craigslist.org posting.  
Please see below for more information.

---

## 65 Chevy Elcamino

Reply to: (see message body)  
Date: 2009-04-18, 10:33AM

nice 1965 camino with a 327 small block, 350 turbo auto., run's/drives great, needs paint/interior work, cash only!!! no low ballers! call 661-588- or 661 333-6270

- Location: N/W bakersfield
- it's NOT ok to contact this poster with services or other commercial interests

Original URL: <http://bakersfield.craigslist.org/cto/1128503286.html>

---

*this craigslist posting was forwarded to you by someone using our email-a-friend feature - if you want to prevent these, please go to:*  
<http://www.craigslist.org/cgi-bin/te/vB3c0NHbA52brFmYyJnLvNmLAAQbj>

---





**REDACTED**

— Original Message —

From: mi @hotmail.com  
To: \*REDACTED\*  
Sent: Saturday, April 18, 2009 12:25 PM  
Subject: free! washer/dryer,all work great (N/W Bakersfield)

mi @hotmail.com has forwarded you this craigslist.org posting.  
Please see below for more information.

---

## free! washer/dryer,all work great

Reply to: (see message body)  
Date: 2009-04-18, 10:42AM

free sears/kenmore washer and dryer, clean, all work great! owners left when they moved out...come pick them up this weekend only!, I will be in and out all of this weekend if I am not there please wait!.... off of olive drive

- Location: N/W Bakersfield
- it's NOT ok to contact this poster with services or other commercial interests

Original URL:<http://bakersfield.craigslist.org/hsh/1128518256.html>

---

*this craigslist posting was forwarded to you by someone using our email-a-friend feature - if you want to prevent these, please go to:*  
<http://www.craigslist.org/cgi-bin/te/vB3c0NHbA52brFmYyJnLvNmLAAQbj>

---



bakersfield craigslist > household

email this posting to a friend

Avoid scams and fraud by dealing locally! Beware any deal involving Western Union, Moneygram, wire transfer, cashier check, money order, shipping, escrow, or any promise of transaction protection/certification/guarantee. *More info*

please flag with care:

miscategorized

prohibited

spam/overpost

best of craigslist

## mitsubishi big screen tv 60" - \$100 (n/w bakersfield)

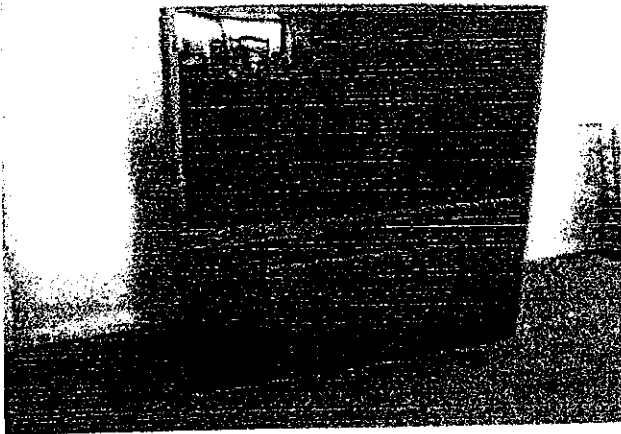
Reply to: see below

Date: 2009-04-18, 11:08AM PDT

**REDACTED**

projection tv!, super nice picture! 2004 model, sacrifice, must sell this weekend!!!...moving, cash only!!!  
pick it up at off of Olive drive I will be in and out all weekend

- Location: n/w bakersfield
- it's NOT ok to contact this poster with services or other commercial interests



PostingID: 1128559616

No contact info?  
if the poster didn't include a phone number, email, or other contact info, craigslist can notify them via email.



RE: [abuse-harass] 911

From: craigslist (abuse@craigslist.org)  
Sent: Sat 4/18/09 7:39 PM  
To: Scott P (mi) (@hotmail.com)

REDACTED

Those posts have been removed from the listings, additional steps have been taken that may help prevent this issue from happening again.

Since these posts appear to be an attempt to impersonate you for the purpose of harassment, we can give you the details we have about them.

(The information shown below represents the complete record in our system for these posts. We don't have the poster's name, phone number, or address, but it is likely that law enforcement authorities will be able to use this information to identify the poster.)

\*\*\*\*\*

----- TEAMREAD ROW 1 -----

PostingID: 1128418184  
ReplyEmail: sp :@hotmail.com  
IPAddress: 99.52.242.39  
CreationDate: 2009-04-18 09:42:38 (Pacific)  
PostedDate: 2009-04-18 09:43:55 (Pacific)  
ModifiedDate: 2009-04-18 19:39:36 (Pacific)  
Area: bakersfield  
GeographicArea: N/W bako  
Category: general  
PostingTitle: spa...free!! u pick up!  
EmailDisplay: no email address shown  
InvoiceItemID: 0  
CurrentPostStatus: staff deleted  
PostingBody  
=====

cal spa only 2 years old, works all accesories, freel, haas to be picked up this weekend!, house forclosed..moving , off of olive drive, heavy bring lots of help..I have a bad back  
<br>

<br>  
<br>  
<br>  
<br>  
<br>

----- TEAMREAD ROW 2 -----

PostingID: 1128449696  
ReplyEmail: sp @hotmail.com  
IPAddress: 99.52.242.39  
CreationDate: 2009-04-18 10:01:10 (Pacific)  
PostedDate: 2009-04-18 10:01:49 (Pacific)  
ModifiedDate: 2009-04-18 19:39:36 (Pacific)  
Area: bakersfield  
GeographicArea: n/w bakersfield  
Category: cars & trucks - by owner  
PostingTitle: 99 mitsubishi eclipse wont pass smog  
PriceOrAge: 500  
EmailDisplay: no email address shown  
InvoiceItemID: 0  
CurrentPostStatus: staff deleted  
PostingBody  
=====

**REDACTED**

Mitsubishi eclipse runs good, needs tags smog, have a clean title, has to go this weekend..moving out of state...come pick it up!..cash only I will not hold this car, first come with the cash gets it!  
off of olive drive.

----- TEAMREAD ROW 3

PostingID: 1128503286  
ReplyEmail: sp @hotmail.com  
IPAddress: 99.52.242.39  
CreationDate: 2009-04-18 10:33:09 (Pacific)  
PostedDate: 2009-04-18 10:33:40 (Pacific)  
ModifiedDate: 2009-04-18 19:39:36 (Pacific)  
Area: bakersfield  
GeographicArea: N/W bakersfield  
Category: cars & trucks - by owner  
PostingTitle: 65 Chevy Elcamino  
PriceOrAge: 1000  
EmailDisplay: no email address shown  
InvoiceItemID: 0  
CurrentPostStatus: staff deleted  
PostingBody  
=====

nice 1965 camino with a 327 small block, 350 turbo auto., run's/drives great, needs paint/interior work, cash only!!! no low ballers! call 661-588- or 661 333-6270

----- TEAMREAD ROW 4

PostingID: 1128518256  
ReplyEmail: sp @hotmail.com  
IPAddress: 99.52.242.39  
CreationDate: 2009-04-18 10:42:15 (Pacific)  
PostedDate: 2009-04-18 10:42:48 (Pacific)  
ModifiedDate: 2009-04-18 19:39:36 (Pacific)  
Area: bakersfield  
GeographicArea: N/W Bakersfield  
Category: household  
PostingTitle: free! washer/dryer, all work great  
PriceOrAge:

EmailDisplay: no email address shown  
InvoiceItemID: 0  
CurrentPostStatus: staff deleted  
PostingBody  
=====

**REDACTED**

free sears/kenmore washer and dryer, clean, all work great! owners left when they moved out...come pick them up this weekend only!, I will be in and out all of this weekend if I am not there please wait!....  
off of olive drive

\*\*\*\*\*

Regards,  
craigslist customer service

\*\*\*\*\*ORIGINAL TEXT\*\*\*\*\*

> Date: Sat, 18 Apr 2009 12:34:00 -0700  
> From: Scott P <mi. @hotmail.com>  
> To: <abuse@craigslist.org>  
> Subject: RE: [abuse-harass] 911

>  
> I have four post ID Numbers just this morning. They are 1128503286, 1128449696, :  
>  
> Thank you,  
>  
> Scott P.

>  
>> Date: Sat, 18 Apr 2009 12:24:17 -0700  
>> From: abuse@craigslist.org  
>> To: mi @hotmail.com  
>> Subject: Re: [abuse-harass] 911

>>  
>> If possible, can you send us the post ID numbers for these ads?  
>>  
>>  
>> Regards,  
>> craigslist customer service

>> \*\*\*\*\*ORIGINAL TEXT\*\*\*\*\*

>>> Date: Sat, 18 Apr 2009 09:26:59 -0700 (PDT)  
>>> From: Scott P <mi @hotmail.com>  
>>> To: <abuse@craigslist.org>  
>>> Subject: [abuse-harass] 911

>>> There has been several postings about me and my family posted here on craigs:  
>>>  
>>> --

>>> X-User-IP: 98.150.19.152  
>>> Form Key: qR514wak30z21Q3e  
>>> User-Agent: Mozilla/4.0 (compatible; MSIE 6.0; Windows NT 5.1; SV1; GTB5; .NI  
>>>  
>>>

craigslist. I already have a case # with the Bakersfield Police for 2 of the postings to find out who is harassing me and my family. The last posting was posted on or about April 16, 2009 about me having a 1967 Camero for sale and that my house was going into forecloser(not true). This person(s) whom is posting these untrue events about me is doing it to cause harm (harass) to my family. My wife had to leave our home on Friday, April 17, 2009 when 2 men arrived at our home to ask about a 1967 Camero and about our home that is &quot;NOT&quot; going into forcloser. This has made my wife extremely scared and now we will have to once again call the Bakersfield Police to inform them about someone using my information to cause harm. I would appreciate you sending me any and all information IP address on the person who posted this last posting using my phone number 661-588- and my name Scott.

> > >

> > > --

> > >

> > > X-User-IP: 98.150.19.152

> > > Form Key: qR5l4wak3Oz2lQ3e

> > > User-Agent: Mozilla/4.0 (compatible; MSIE 6.0; Windows NT 5.1; SV1; GTB5; .NET CLR 1.1.4322; .NET CLR 2.0.50727)

> > >

> > >

>

>

> Rediscover Hotmail@: Now available on your iPhone or BlackBerry

>

[http://windowslive.com/RediscoverHotmail?ocid=TXT\\_IAGLM\\_WL\\_HM\\_Rediscover\\_Mobile2\\_042009](http://windowslive.com/RediscoverHotmail?ocid=TXT_IAGLM_WL_HM_Rediscover_Mobile2_042009)

**REDACTED**



Re: 911

From: **craigslist** (abuse@craigslist.org)  
Sent: Sun 4/19/09 12:46 PM  
To: Scott P (mi @hotmail.com)

**REDACTED**

Here are the details for those two posts:

\*\*\*\*\*

----- TEAMREAD ROW 1

-----  
PostingID: 1128433992  
ReplyEmail: sp @hotmail.com  
IPaddress: 99.52.242.39  
CreationDate: 2009-04-18 09:51:53 (Pacific)  
PostedDate: 2009-04-18 09:52:55 (Pacific)  
ModifiedDate: 2009-04-18 09:52:55 (Pacific)  
Area: bakersfield  
GeographicArea: n/w bako  
Category: furniture - by owner  
PostingTitle: table /6 chairs/ couch...free!!  
EmailDisplay: no email address shown  
InvoiceItemID: 0  
CurrentPostStatus: made active by user  
PostingBody  
=====

new tenants moving in on mon. all furniiture has to be moved this weekend!!!. prior renters left, lot's fo nice furnitre, first come first serve!m, bring your truck and help, I can not do any lifting...  
off of olive drive...

----- TEAMREAD ROW 2

-----  
PostingID: 1128449696  
ReplyEmail: sp @hotmail.com  
IPaddress: 99.52.242.39  
CreationDate: 2009-04-18 10:01:10 (Pacific)  
PostedDate: 2009-04-18 10:01:49 (Pacific)  
ModifiedDate: 2009-04-18 19:39:36 (Pacific)  
Area: bakersfield  
GeographicArea: n/w bakersfield  
Category: cars & trucks - by owner  
PostingTitle: 99 mitsubishi eclipse wont pass smog  
PriceOrAge: 500  
EmailDisplay: no email address shown  
InvoiceItemID: 0  
CurrentPostStatus: staff deleted  
PostingBody  
=====

Mitsubishi eclipse runs good, needs tags smog, have a clean title, has to go this weekend..moving out of state...come pick it up!1..cash only I will not hold this car, first come with the cash gets it!

off of olive drive.

\*\*\*\*\*

Regards,  
craigslist customer service

\*\*\*\*\*ORIGINAL TEXT\*\*\*\*\*

> Date: Sun, 19 Apr 2009 09:32:17 -0700  
> From: Scott P. <mi @hotmail.com>  
> To: <abuse@craigslist.org>  
> Subject: 911

**REDACTED**

>  
>  
>  
>  
>  
>  
>

> Good Morning,

>  
>

> I just received from Craigslist yesterday the IP addresses for these Post ID #'s:

>  
>

> In addition to those post ID #'s above I need the IP addresses for post ID #'s :

>  
>

> Thank you,

>  
>

> Scott P

>

> My home address is

>

> My home telephone # is 661-588-

>

> My work cell # is 661-333-6270

>  
>

> Rediscover Hotmail@: Now available on your iPhone or BlackBerry  
> [http://windowslive.com/RediscoverHotmail?ocid=TXT\\_TAGLM\\_WL\\_HM\\_Rediscover\\_Mobile2](http://windowslive.com/RediscoverHotmail?ocid=TXT_TAGLM_WL_HM_Rediscover_Mobile2)





REDACTED

Plans and Services

Table with columns for Description and Amount. Includes sections for 'Surcharges and Other Fees - Continued' and 'Government Fees and Taxes'.

AT&T Long Distance

Important Information
Message Regarding Terms & Conditions:
To view your Terms & Conditions for AT&T Long Distance...

Account Summary table with columns for Description and Amount. Shows charges for April totaling 7.52.

Invoice Summary table with columns for Description and Amount. Shows current charges totaling 7.52.

Service Charges table with columns for Description, Period, Qty, and Amount. Shows monthly service charges totaling 5.00.

Call Charges - Mar 11th thru Apr 10th

Call log table with columns: Dom, To, Date, File, Place Called, Number, Code, Min, Amount. Includes a large arrow pointing to the right.

Subtotal Domestic Calls for 661-588

Total Domestic Calls for 661-588

Total Calls for 661-588

Total Call Charges

REDACTED

Surcharges and Other Fees

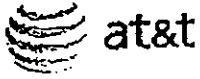
Table with columns for Description and Amount. Lists items like Carrier Cost Recovery Fee and Fed Universal Service Fund.

Government Fees and Taxes

Table with columns for Description and Amount. Lists items like CA High Cost Fund B and CA Advanced Svc Fund.

Thank you for being a valued AT&T customer! When you send us a check as payment, you give us the most
authoritative way to clear your check electronically. Electronic payments may clear the same day we receive the
payment. Your e-check will not be returned. If we cannot post the transaction electronically, we will
present a hard copy of your check for payment. If you do not wish to participate in AT&T's e-check conversion
program please call 1 800 252-0000. You want to save time and save paper for any payment.
www.att.com/peppes using your existing account's credit card. It's easy, secure and convenient!





Print Print Preview Save Close

Call Detail

REDACTED

User Name : SCOTT P

Rate Code: URM7=700 Rollover Mins, MATS=Unity Shared M2L, M2MS=Unlimited M2M, NWSU=Unlimited N&W

Rate Period (PD): DT=Daytime, NW=Nwknd

Feature: M2X=Expanded Calling, VM=VOICE MAIL, M2MC=EXPANDED M2M, CW=Call Waiting

Item	Day	Date	Time	Number Called	Call To	Min	Rate Code	Rate Pd	Feature	Airtime Charge	LD/Add'l Charge	Total Charge
1	MON	03/16/2009								0.00	0.00	0.00
2	MON	03/16/2009								0.00	0.00	0.00
3	MON	03/16/2009								0.00	0.00	0.00
4	MON	03/16/2009								0.00	0.00	0.00
5	MON	03/16/2009								0.00	0.00	0.00
6	MON	03/16/2009								0.00	0.00	0.00
7	MON	03/16/2009								0.00	0.00	0.00
8	MON	03/16/2009								0.00	0.00	0.00
9	MON	03/16/2009								0.00	0.00	0.00
10	MON	03/16/2009								0.00	0.00	0.00
11	MON	03/16/2009								0.00	0.00	0.00
12	MON	03/16/2009								0.00	0.00	0.00
13	MON	03/16/2009								0.00	0.00	0.00
14	MON	03/16/2009								0.00	0.00	0.00
15	MON	03/16/2009								0.00	0.00	0.00
16	MON	03/16/2009								0.00	0.00	0.00
17	MON	03/16/2009								0.00	0.00	0.00
18	MON	03/16/2009								0.00	0.00	0.00
19	TUE	03/17/2009								0.00	0.00	0.00
20	TUE	03/17/2009								0.00	0.00	0.00
21	TUE	03/17/2009								0.00	0.00	0.00
22	TUE	03/17/2009								0.00	0.00	0.00
23	TUE	03/17/2009								0.00	0.00	0.00
24	TUE	03/17/2009								0.00	0.00	0.00
25	TUE	03/17/2009								0.00	0.00	0.00
26	TUE	03/17/2009								0.00	0.00	0.00
27	TUE	03/17/2009								0.00	0.00	0.00
28	TUE	03/17/2009								0.00	0.00	0.00
29	TUE	03/17/2009								0.00	0.00	0.00
30	TUE	03/17/2009								0.00	0.00	0.00
31	TUE	03/17/2009								0.00	0.00	0.00
32	TUE	03/17/2009								0.00	0.00	0.00
33	TUE	03/17/2009								0.00	0.00	0.00
34	TUE	03/17/2009								0.00	0.00	0.00
35	TUE	03/17/2009								0.00	0.00	0.00
36	TUE	03/17/2009								0.00	0.00	0.00
37	TUE	03/17/2009								0.00	0.00	0.00
38	TUE	03/17/2009								0.00	0.00	0.00
39	WED	03/18/2009								0.00	0.00	0.00
40	WED	03/18/2009								0.00	0.00	0.00
41	WED	03/18/2009								0.00	0.00	0.00
42	WED	03/18/2009								0.00	0.00	0.00
43	WED	03/18/2009								0.00	0.00	0.00
44	WED	03/18/2009								0.00	0.00	0.00
45	WED	03/18/2009								0.00	0.00	0.00
46	WED	03/18/2009								0.00	0.00	0.00
47	WED	03/18/2009								0.00	0.00	0.00

REDACTED









"Our mission is to impartially dispense justice to all residents of the County of Kern."



### Criminal Calendar - Case Details

[criminal case information/calendar menu](#) / [search results](#) / case details

<b>Defendant Information:</b>	Name:	SIMPSON, MICHAEL ODELL	Birth Year:	1966
<b>Case Information:</b>	Court Case #:	BF128875A	Filing Date:	08/04/09
	Arrest Date:	07/31/09	Related Case #:	None
	Bail Amount:	\$50000.00	Bail Status:	ACTIVE
			Bail Type:	SURETY BOND

Charges/Dispositions						
Count	Type	Code	Section	Charge Description	Charge Disposition	Disposition Date
001	F	PC	664/460(A)	ATTEMPTED BURGLARY:FIRST DEGREE		
002	F	PC	529.2	PERSONATE TO RECORD DOCUMENT		
003	F	PC	529.2	PERSONATE TO RECORD DOCUMENT		
004	F	PC	529.2	PERSONATE TO RECORD DOCUMENT		
005	F	PC	530.5(A)	UNAUTHORIZED USE OF IDENTIFYING INFORMATION OF ANOTHER		

**Sentence Information**

\*\* n/a - no convicted charges \*\*

**Scheduled Hearings**

*Notes: 1. For Metropolitan Division cases: If the Div/Dept is 1-17, A-K or T then the Div/Dept is your courtroom number. If the Div/Dept is other than those listed in the previous sentence see the information desk near the escalator for your courtroom number.  
 2. If a defendant has more than one hearing scheduled for the same date and time, he or she should appear on the felony case first.  
 3. Calendars for each court may periodically change as court schedules are modified by court personnel. Persons viewing the court calendar assume full responsibility for appearing at the proper date and time and at the proper court irrespective of the information contained herein.*

Hearing Date/Time	Hearing Location	Div/Dept	Hearing Type
08/04/2009, 3:00PM	Metro Division - 1415 Truxtun	FA	FELONY ARRAIGNMENT
08/11/2009, 08:30AM	Metro Division - 1415 Truxtun	CC	FELONY ARRAIGNMENT
08/11/2009, 08:30AM	Metro Division - 1415 Truxtun	CC	MOTION
09/15/2009, 09:00AM	Metro Division - 1415 Truxtun	PH	PRE-PRELIMINARY HEARING
09/17/2009, 08:30AM	Metro Division - 1415 Truxtun	PX	PRELIMINARY HEARING

Aliases	
Defendant name	SIMPSON, MICHAEL ODELL
Aliases	** None **

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