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1 Sterling E. Norris, Esq. (SBN 040993)
2 JUDICIAL WATCH, INC.
3 2540 Huntington Drive, Suite 201
4 San Marino, CA 91108
5 Tel.: (626) 287-4540
6 Fax: (626) 237-2003

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CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

7 *Attorneys for Plaintiffs*

BY _____

8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

10
11 **LESLIE DUTTON and AMERICAN**
12 **ASSOCIATION OF WOMEN, INC.,**

Case No.

CV 12 1888 - R
GCX

13 **Plaintiffs,**

**COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF**

14 **v.**

DEMAND FOR JURY TRIAL

15 **LEE SMALLEY EDMON, in her**
16 **official capacity as Presiding Judge**
17 **of the Superior Court of California,**
18 **County of Los Angeles, ANN I.**
19 **JONES, in her official capacity as**
20 **a Judge of the Superior Court of**
21 **California, County of Los Angeles,**
22 **and D. BRETT BIANCO, in his**
23 **official capacity as Court Counsel**
24 **to the Superior Court of California,**
25 **County of Los Angeles,**

26 **Defendants.**

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Plaintiffs **LESLIE DUTTON and AMERICAN ASSOCIATION OF
WOMEN, INC.** hereby sue Defendants **LEE SMALLEY EDMON, ANN I. JONES,**

**Complaint for Declaratory and Injunctive Relief;
Demand for Jury Trial**

1 and D. BRETT BLANCO for violation of the First and Fourteenth Amendments to
2 the Constitution of the United States and allege as follows:

3 **JURISDICTION AND VENUE**

4 1. This Complaint for declaratory and injunctive relief is asserted by
5 Plaintiffs LESLIE DUTTON and AMERICAN ASSOCIATION OF WOMEN,
6 INC. pursuant to 42 U.S.C. §§ 1983 and 1988. The Court has jurisdiction over this
7 action pursuant to 28 U.S.C. §§ 1331, 1343(3), and 2201.

8 2. Venue in this Court is proper pursuant to 28 U.S.C. § 1391(b) because
9 a substantial part of the events or omissions giving rise to the claim at issue
10 occurred in this judicial district and Defendants reside within this judicial district.

11 **PARTIES**

12 3. Plaintiff LESLIE DUTTON ("DUTTON") is the President of Plaintiff
13 AMERICAN ASSOCIATION OF WOMEN, INC. Plaintiff DUTTON also is the
14 producer and host of the public affairs television program known as Full Disclosure
15 Network.
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17 4. Plaintiff AMERICAN ASSOCIATION OF WOMEN, INC.
18 ("AMERICAN ASSOCIATION OF WOMEN") is a corporation incorporated
19 under the laws of the State of California. Plaintiff AMERICAN ASSOCIATION
20 OF WOMEN operates as a not-for-profit, educational organization under Section
21 501(c)(3) of the Internal Revenue Code. Plaintiff AMERICAN ASSOCIATION
22 OF WOMEN disseminates the public affairs television program known as Full
23 Disclosure Network.

24 5. Defendant LEE SMALLEY EDMON ("EDMON") is, and at all
25 relevant times herein was, the Presiding Judge of the Superior Court of California,
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1 County of Los Angeles ("LASC"). Defendant EDMON is being sued in her
2 official capacity only.

3 6. Defendant ANN I. JONES ("JONES") is, and at all relevant times
4 herein was, a Judge of the LASC. Defendant JONES is being sued in her official
5 capacity only.

6 7. Defendant D. BRETT BIANCO ("BIANCO") is, and at all relevant
7 times herein was, Court Counsel to the LASC. Defendant BIANCO is being sued
8 in his official capacity only.

9 **FACTUAL BACKGROUND**

10 8. Full Disclosure Network is an Emmy Award winning public affairs
11 television program available on public access cable television channels and
12 streamed over the Internet via the program's website, www.FullDisclosure.net.
13 Full Disclosure Network features videotaped interviews with government officials,
14 community leaders, experts, and other persons of interest, as well as commentary
15 by Plaintiff DUTTON. It also features video news blogs that are made available to
16 the public on Full Disclosure Network's website.

17 9. Plaintiff LESLIE DUTTON is the producer and host of Full
18 Disclosure Network's programs and video blogs.

19 10. Full Disclosure Network's programs and video news blogs cover a
20 wide variety of subjects, including national issues, such as border security and
21 terrorism, as well as state and local issues such as California Assembly
22 proceedings, recall elections, local police practices, public corruption, gangs, and
23 education.
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25 11. In 2009, Plaintiffs DUTTON and AMERICAN ASSOCIATION OF
26 WOMEN began a series of programs and video news blogs for Full Disclosure
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1 Network concerning certain supplemental benefits paid by the County of Los
2 Angeles to judges of the LASC. These county-provided benefits were above and
3 beyond the salary and benefits that the judges of the LASC receive from the State
4 of California and had been declared unconstitutional by the California Court of
5 Appeal in 2008. The programs and video news blogs created and disseminated by
6 Plaintiffs DUTTON and AMERICAN ASSOCIATION OF WOMEN have been
7 featured prominently on the Full Disclosure Network website and have been the
8 subject of numerous press releases and email updates, also issued by Plaintiffs
9 DUTTON and AMERICAN ASSOCIATION OF WOMEN. In their programs and
10 video news blogs for the Full Disclosure Network about the county-provided
11 benefits, Plaintiffs DUTTON and AMERICAN ASSOCIATION OF WOMEN have
12 been very critical of the County of Los Angeles, the judges of the LASC, and the
13 benefits.

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15 12. Since approximately March 2009, Plaintiffs DUTTON and
16 AMERICAN ASSOCIATION OF WOMEN also have been reporting on Mr.
17 Richard I. Fine, a controversial, disbarred California attorney, as part of Full
18 Disclosure Network's programs and video news blogs. Mr. Fine, who has
19 described himself in court pleadings as being "known for fighting government
20 corruption and misappropriation of funds by state, county and municipal
21 governments" and claims to have been "active in fighting judicial corruption" over
22 the last ten years, also has been an outspoken critic of the county-provided judicial
23 benefits.

24 13. From on or about March 4, 2009 until on or about September 17,
25 2010, Mr. Fine was incarcerated in the Men's Central Jail of the Los Angeles
26 County Sheriff's Department pursuant to a civil contempt order entered by the Hon.
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1 David P. Yaffe, a judge of the LASC who presided in Department 86 of the
2 LASC's Stanley Mosk Courthouse at the time, in the matter captioned *Colony*
3 *Marina Strand II v. County of Los Angeles, et al.*, BS109420. Mr. Fine's
4 incarceration related, at least in part, to various legal challenges Mr. Fine had
5 raised regarding the county-provided judicial benefits. Mr. Fine had initiated a
6 host of legal actions challenging both his incarceration and the county-provided
7 benefits. Many of the proceedings in Mr. Fine's legal actions, including the
8 hearing at which he was held in contempt, took place in Department 86 of the
9 LASC's Stanley Mosk Courthouse.

10 14. In their programs and video news blogs for the Full Disclosure
11 Network regarding Mr. Fine, Plaintiffs DUTTON and AMERICAN
12 ASSOCIATION OF WOMEN have been highly critical of both the lengthy
13 incarceration of Mr. Fine and the county-provided benefits.

14 15. On information and belief, at all relevant times Defendants EDMON,
15 JONES, and BIANCO were aware of Plaintiffs DUTTON's and AMERICAN
16 ASSOCIATION OF WOMEN's programs and video news blogs for the Full
17 Disclosure Network regarding the county-provided benefits and Mr. Fine's lengthy
18 incarceration. On information and belief, at all relevant times Defendants
19 EDMON, JONES, and BIANCO also were aware of Plaintiffs DUTTON's and
20 AMERICAN ASSOCIATION OF WOMEN's criticism of the county-provided
21 benefits and the lengthy incarceration of Mr. Fine.

22 16. In addition to Plaintiffs DUTTON's and AMERICAN
23 ASSOCIATION OF WOMEN's programs and video news blogs, Mr. Fine's legal
24 activities and lengthy incarceration for civil contempt garnered substantial local
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1 and national media attention, including coverage by the *Los Angeles Times* and
2 *CNN*.

3 17. LASC has a longstanding practice of making courtrooms available to
4 members of the media for filming, including filming news reports about cases of
5 public interest, when the courtrooms are not being used for judicial proceedings.
6 The superior court also has a longstanding practice of making courtrooms available
7 to members of the public for non-court related meetings and events when the
8 courtrooms are not being used for judicial proceedings. Plaintiff DUTTON has
9 personally attended non-court related meetings and events held in LASC
10 courtrooms on multiple occasions.

11 18. On or about March 4, 2009, Plaintiffs DUTTON and AMERICAN
12 ASSOCIATION OF WOMEN made a request to video record the proceedings in
13 the *Colony Marina Strand II v. County of Los Angeles* matter, which were being
14 held in Department 86 of the LASC's Stanley Mosk Courthouse and at which Mr.
15 Fine was found to be in civil contempt and subsequently incarcerated. The request
16 was denied by Judge Yaffe.

17 19. In approximately May 2010, a CNN reporter, Abbie Boudreau, and
18 film crew was granted access to Department 86 of the LASC's Stanley Mosk
19 Courthouse to video record a news report about Mr. Fine and his then-continuing
20 incarceration for civil contempt. Ms. Boudreau and the CNN film crew
21 subsequently video recorded their report when the courtroom was empty. The
22 report prominently featured the judge's bench and the seal of the State of California
23 affixed to the wall behind the judge's bench.

24 20. On or about November 15, 2011, Plaintiffs DUTTON and
25 AMERICAN ASSOCIATION OF WOMEN sent a letter to Defendant JONES, who
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1 at the time presided and currently presides in Department 86, requesting access to
2 the courtroom:

3 [Full Disclosure Network] is an Emmy Award winning informational
4 news program of the tax-exempt 501(c)(3) American Association of
5 Women. The AAW is now involved in production of a documentary
6 program covering the above case. We need to record an account of
7 what happened in the court room of Department 86 on March 4, 2009
8 for our documentary. . . .

9 We are writing to you as the Judge in Department 86, asking for your
10 assistance with our media request and to obtain access to the court
11 room and the corridor just outside the court room sometime in the next
12 two weeks. We are looking to video record two witness accounts of
13 the hearing that took place in 2009 and to read from the transcript of
14 the proceedings. This will involve a total of three people. Two
15 witnesses and one camera operator and will not involve any members
16 of the public or court employees.

17 It is our understanding that the Department 86 court room is being
18 used only in the mornings and that many times is completely empty. It
19 is our hope that you will facilitate this request and provide us
20 confirmation and alternative days and times that the court room and
21 the corridor would be available for this purpose.

22 21. On or about November 16, 2011, Plaintiffs DUTTON and
23 AMERICAN ASSOCIATION OF WOMEN sent a follow-up letter to Defendant
24 EDMON:

25 [Full Disclosure Network] is an Emmy Award winning informational
26 program produced by the non-profit 501(c)(3) American Association
27 of Women. The AAW is producing a documentary program covering
28 the above case. We are now ready to finish this project.

29 We need to record eye witness accounts of what happened in
30 Department 86 and the corridor outside on March 4, 2009.

31 . . . We are requesting your assistance with our media request to obtain
32 access to the court room and the corridor just outside the court room
33 sometime in the next two weeks.

34 We need to video record two historical witness accounts of the hearing
35 and events that took place in these two locations back in 2009 and to
36 read from the transcript of the proceedings. This will involve a total
37 of three people. Two witnesses and one camera operator and will not
38 involve any members of the public or court employees.

1 Because of the historical nature of this documentary, it is important
2 that we get the shots in Department 86 and the corridor just outside.
3 The witness interviews are expected to last for approximately one half
4 hour inside the actual court room.

5 22. Defendant JONES denied the request of Plaintiffs DUTTON and
6 AMERICAN ASSOCIATION OF WOMEN, without explanation, by order entered
7 on or about November 18, 2011.

8 23. Also on or about November 18, 2011, Plaintiffs DUTTON and
9 AMERICAN ASSOCIATION OF WOMEN received a facsimile from the LASC
10 notifying them that Defendant EDMON had denied their request to video record
11 the corridor outside Department 86. Again, no explanation was provided.

12 24. In denying the request, however, LASC Acting Director of Public
13 Information Mary Eckhard Hearn advised Plaintiffs DUTTON and AMERICAN
14 ASSOCIATION OF WOMEN that, as an alternative, they could "follow the
15 procedures for commercial requests to film in the courthouse, which entails
16 submitting the required paperwork to the Administrative Office of the Courts,
17 providing a certificate of insurance, and posting fees for any costs arising from the
18 filming."

19 25. On or about December 7, 2011, Plaintiffs DUTTON and AMERICAN
20 ASSOCIATION OF WOMEN fully and completely executed and filed an
21 "Application for Revocable License for the Use of Real Property" with the
22 Administrative Offices of the Courts, as advised by the LASC's Acting Director of
23 Public Information. In their application, Plaintiffs DUTTON and AMERICAN
24 ASSOCIATION OF WOMEN expressly stated that they sought access to
25 Department 86 for approximately one half hour only "any day [the] courtroom is
26 empty at any time" in order to video record interviews with two witnesses and read
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1 from the transcript of the original hearing. Plaintiffs DUTTON and AMERICAN
2 ASSOCIATION OF WOMEN also requested permission to video record a
3 “hallway shot” and “agree[d] to pay the costs associated with this event as will be
4 determined by the court and the [Administrative Offices of the Courts] and to
5 provide any additional information and complete any necessary forms related to the
6 issuance of a Revocable License for the Use of Real Property.”

7 26. On or about December 13, 2011, Defendant BIANCO, acting on
8 information and belief at the direction of Defendant EDMON, wrote to Plaintiffs
9 DUTTON and AMERICAN ASSOCIATION OF WOMEN and notified them that
10 their application had been denied. Again, no explanation was provided.

11 27. On or about December 21, 2011, Plaintiffs DUTTON and
12 AMERICAN ASSOCIATION OF WOMEN, by counsel, wrote a letter to
13 Defendant BIANCO requesting reconsideration of the December 13, 2011 denial of
14 their application. Defendant BIANCO failed to respond.

15 28. When Plaintiffs DUTTON and AMERICAN ASSOCIATION OF
16 WOMEN received no response to their December 21, 2011 letter to Defendant
17 BIANCO, they sent a follow-up letter, by counsel, to Defendant EDMON on or
18 about February 8, 2012.

19 29. On or about February 9, 2012, Defendant BIANCO, acting on
20 information and belief at the direction of Defendant EDMON, wrote a letter to
21 counsel for Plaintiffs DUTTON and AMERICAN ASSOCIATION OF WOMEN
22 notifying them that their request for reconsideration of the December 13, 2011
23 denial of their application had been denied. Again, no explanation was provided.

24 30. The repeated denials by Defendants EDMON, JONES, and BIANCO,
25 without explanation, of the requests of Plaintiffs DUTTON and AMERICAN
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1 ASSOCIATION OF WOMEN for access to Department 86 and the corridor outside
2 Department 86 are arbitrary and capricious and are neither necessary to preserve
3 any overriding governmental interest nor narrowly tailored to serve that interest.

4 31. On information and belief, the repeated denials by Defendants
5 EDMON, JONES, and BIANCO of the requests of Plaintiff DUTTON and
6 AMERICAN ASSOCIATION OF WOMEN for access to Department 86 and the
7 corridor outside Department 86 also have been based, at least in part, on Plaintiff
8 DUTTON'S and AMERICAN ASSOCIATION OF WOMEN'S coverage and
9 criticism of the county-provided benefits paid to the judges of the LASC and Mr.
10 Fine's lengthy incarceration for civil contempt.

11 32. The refusal of Defendants EDMON, JONES, and BIANCO to allow
12 Plaintiffs DUTTON and AMERICAN ASSOCIATION OF WOMEN access to
13 Department 86 and the corridor outside Department 86 has harmed and is harming
14 the ability of Plaintiffs DUTTON and AMERICAN ASSOCIATION OF WOMEN
15 to complete their documentary on the county-provided benefits and Mr. Fine's
16 lengthy incarceration for civil contempt. It also has harmed and is harming the
17 ability of Plaintiffs DUTTON and AMERICAN ASSOCIATION OF WOMEN to
18 report on and disseminate information and provide commentary about the county-
19 provided benefits and Mr. Fine's lengthy incarceration for civil contempt, and to
20 otherwise carry out their public interest mission.

21
22 **COUNT I**

23 **(Violation of the First Amendment - 42 U.S.C. § 1983)**

24 33. Plaintiffs hereby reallege Paragraphs 1 through 32 as if fully stated
25 herein.
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1 34. Plaintiff DUTTON and AMERICAN ASSOCIATION OF WOMEN
2 enjoy the rights of Freedom of Speech and Freedom of the Press, as guaranteed by
3 the First and Fourteenth Amendments to the U.S. Constitution.

4 35. As members of the public and members of the press, Plaintiff
5 DUTTON and AMERICAN ASSOCIATION OF WOMEN also enjoy a qualified
6 right, under the First and Fourteenth Amendments to the U.S. Constitution, to
7 access to the courtrooms, hallways, and other facilities of the LASC.

8 36. Defendants EDMON, JONES, and BIANCO, acting within the course
9 and scope of their authority and under color of state law, have deprived and are
10 continuing to deprive Plaintiffs DUTTON and AMERICAN ASSOCIATION OF
11 WOMEN of their rights under the U.S. Constitution by denying their requests for
12 access to Department 86 and the corridor outside Department 86.

13 37. Plaintiffs DUTTON and AMERICAN ASSOCIATION OF WOMEN
14 are being irreparably and substantially injured as a direct and proximate result of
15 Defendants EDMON's, JONES's, and BIANCO's unlawful deprivation of
16 Plaintiffs DUTTON's and AMERICAN ASSOCIATION OF WOMEN's
17 constitutional rights.

18 38. Plaintiffs DUTTON and AMERICAN ASSOCIATION OF WOMEN
19 have no adequate remedy at law.

20 WHEREFORE, Plaintiff respectfully requests that the Court: (1) declare the
21 refusal of Defendants EDMON, JONES, and BIANCO to allow Plaintiffs
22 DUTTON and AMERICAN ASSOCIATION OF WOMEN access to Department
23 86 and the corridor outside Department 86, as requested, to be unlawful; (2) enjoin
24 Defendants EDMON, JONES, and BIANCO from continuing to deny Plaintiffs
25 DUTTON and AMERICAN ASSOCIATION OF WOMEN access to Department
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1 86 and the corridor outside Department 86, as requested; (3) award Plaintiffs
2 DUTTON and AMERICAN ASSOCIATION OF WOMEN reasonable attorney's
3 fees and costs; and (4) grant such other relief as the Court may deem just and
4 proper.

5 **PLAINTIFF DEMANDS A TRIAL BY JURY.**

6 Dated: March 6, 2012

Respectfully submitted,
JUDICIAL WATCH, INC.

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9 By:


Sterling E. Norris
Attorneys for Plaintiffs

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

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Manuel Real and the assigned discovery Magistrate Judge is Jacqueline Chooljian.

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

CV12- 1888 R (JCx)

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

Unless otherwise ordered, the United States District Judge assigned to this case will hear and determine all discovery related motions.

=====

NOTICE TO COUNSEL

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

Subsequent documents must be filed at the following location:

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

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

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

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

Sterling E. Norris, Esq., SBN 040993
Judicial Watch, Inc.
2540 Huntington Drive, Suite 201
San Marino, CA 91108-2601
(626) 287-4540

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Leslie Dutton and American Association of Women,
Inc.

CASE NUMBER

PLAINTIFF(S)

CV 12 1888 - RGCX

v.

LEE SMALLEY EDMON; ANN I. JONES; and D.
BRETT BIANCO,

SUMMONS

See attached

DEFENDANT(S).

TO: DEFENDANT(S): LEE SMALLEY EDMON; ANN I. JONES; AND D. BRETT BIANCO.

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Sterling E. Norris, Esq., whose address is 2540 Huntington Drive, Suite 201, San Marino, CA 91108-2601. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: MAR - 6 2012

By: *Marilyn Dutton*
Deputy Clerk

(Seal of the Court)

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

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) LESLIE DUTTON and AMERICAN ASSOCIATION OF WOMEN, INC.	DEFENDANTS LEE EDMOND SMALLEY; ANN I. JONES; and D. BRETT BIANCO <i>see attached</i>
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) (626) 287-4540 Sterling E. Norris, SBN 040993 JUDICIAL WATCH, INC. 91108 2540 Huntington Dr., S. 201, San Marino, CA	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> </thead> <tbody> <tr> <td>Citizen of This State</td> <td><input checked="" type="checkbox"/></td> <td><input checked="" type="checkbox"/></td> <td>Incorporated or Principal Place of Business in this State</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Foreign Nation</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </tbody> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Incorporated or Principal Place of Business in this State	<input type="checkbox"/>	<input type="checkbox"/>	Citizen of Another State	<input type="checkbox"/>	<input type="checkbox"/>	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/>	<input type="checkbox"/>	Citizen or Subject of a Foreign Country	<input type="checkbox"/>	<input type="checkbox"/>	Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>
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Citizen or Subject of a Foreign Country	<input type="checkbox"/>	<input type="checkbox"/>	Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>																				

IV. ORIGIN (Place an X in one box only.)

1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify):
 6 Multi-District Litigation
 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: Yes No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: Yes No **MONEY DEMANDED IN COMPLAINT:** \$ -0-

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Complaint for Declaratory & Injunctive Relies; Demand for Jury Trial

VII. NATURE OF SUIT (Place an X in one box only.)

<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input checked="" type="checkbox"/> 446 American with Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV 12 1888

FOR OFFICE USE ONLY: Case Number: _____

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

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? No Yes
If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? No Yes
If yes, list case number(s): _____

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

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

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

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

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

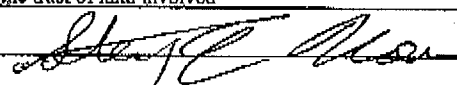
b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
 Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

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

c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

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

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties
Note: In land condemnation cases, use the location of the tract of land involved

C. SIGNATURE OF ATTORNEY (OR PRO PER):  Date March 6, 2012

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

Key to Statistical codes relating to Social Security Cases:

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

Sterling E. Norris, Esq., SBN 040993
Judicial Watch, Inc.
2540 Huntington Drive, Suite 201
San Marino, CA 91108-2601
(626) 287-4540

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Leslie Dutton and American Association of Women,
Inc.

PLAINTIFF(S)

v.

LEE SMALLEY EDMON; ANN I. JONES; and D.
BRETT BIANCO,

See attached

DEFENDANT(S).

CASE NUMBER

CV 12 1888 - R (JCA)

SUMMONS

TO: DEFENDANT(S): LEE SMALLEY EDMON; ANN I. JONES; AND D. BRETT BIANCO.

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached complaint amended complaint counterclaim cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Sterling E. Norris, Esq., whose address is 2540 Huntington Drive, Suite 201, San Marino, CA 91108-2601. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court

Dated: MAR - 6 2012

By: _____



(Seal of the Court)

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