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OF ORIGINAL FILED
Superior Court of California
County of Los Angeles

JUL 14 2010

John A. Clarke, Executive Officer/Clerk

By RUGENA LOPEZ Deputy

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6 Plaintiffs in propria persona

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF LOS ANGELES

10 Angel Luevano and Argentina
11 Luevano,
12 Plaintiff,

13 vs.

14 Benigno Diaz aka Benny
15 Diaz, Rudy Rodriguez,
16 Rebecca Sandoval, Beth
17 Martinez, Henry Salazar,
18 Ricardo Mendoza, Luis
19 Roberto Vera, Jr.; League
20 of United Latin American
21 Citizens, a Texas
22 corporation, Miguel
23 Gonzalez aka Mike Gonzalez
24 aka Michael Gonzalez, Santa
25 Ana Security Services, Inc.
26 and Does 1-150, inclusive,

27 Defendants,

28 League of United Latin
American Citizens, a
California corporation, as
a defendant pursuant to
Section 382 C.C.P.

Case No.:

COMPLAINT: BC441643

1. Declaratory Relief
2. Libel Per Se
3. Invasion of Privacy
4. Declaratory Relief
5. Injunctive Relief

PLAINTIFFS ALLEGE AS FOLLOWS:

1. Plaintiff Angel Luevano is a resident of the County of Contra Costa and the State of California. At all times relevant herein, he is and has been the Vice President for the Far West Region of the League of United Latin

1 American Citizens, a Texas corporation, and a
2 member of the League of United Latin American
3 Citizens, a California corporation.

4 2. Plaintiff Argentina Luevano is a resident of
5 the County of Contra Costa and the State of
6 California. At all times relevant herein, she
7 is and has been the State Director of and a
8 member of the League of United Latin American
9 Citizens, a California corporation.

10 3. Defendant Benigno Diaz aka Benny Diaz is a
11 resident of the County of Orange and of the
12 State of California.

13 4. Defendant Rudy Rodriguez is upon the
14 information and belief of Plaintiffs a resident
15 of the County of San Benito and the State of
16 California.

17 5. Defendant Rebecca Sandoval is a resident of the
18 County of Sacramento and the State of
19 California.

20 6. Defendant Beth Martinez upon the information
21 and belief of Plaintiffs is a resident of the
22 County of Orange and of the State of
23 California.

24 7. Defendant Henry Salazar is a resident of the
25 County of Los Angeles and of the State of
26 California.

1 8. Defendant Ricardo Mendoza is a resident of the
2 County of Orange and of the State of
3 California.

4 9. Defendant Luis Roberto Vera, Jr. is upon the
5 information and belief of Plaintiffs a resident
6 of the County of Bexar and the State of Texas.

7 10. Defendant League of United Latin American
8 Citizens, a Texas Corporation is headquartered
9 in the District of Columbia.

10 11. Defendant League of United Latin American
11 Citizens, a California Corporation,
12 (hereinafter "LULAC California") is California
13 Corporation #C181912 and is the sole qualified
14 corporation by which Defendant League of United
15 Latin American Citizens (National), a Texas
16 corporation, purports to operate through in
17 California. Article Three of this entity's
18 Articles of Incorporation require it to be
19 headquartered in the County of Los Angeles.
20 LULAC California is a non-profit corporation
21 organized and existing under the laws of
22 California and qualified under Section 501(c)
23 (4) of the 'Internal Revenue Code of 1986 (as
24 amended), 26 U.S.C. §501(c) (4), as a
25 corporation organized and operated for the
26 purpose of enhancing educational and employment
27 opportunities and the enhancement of civil
28

1 rights for the benefit of the Hispanic
2 community in the United States.

3 12. Defendant Miguel Gonzalez aka Mike Gonzalez aka
4 Michael Gonzalez, hereinafter "Gonzalez," is a
5 resident of the County of Orange and the State
6 of California. At all times relevant herein
7 Gonzalez is and was the owner and qualified
8 manager of Santa Ana Security Services, Inc., a
9 California corporation.

10 13. Defendant Santa Ana Security Services, Inc. is
11 a California corporation in good standing,
12 licensed by the Bureau of Security and
13 Investigative Services as a Private Patrol
14 Operator, headquartered in the County of
15 Orange, State of California.

16 14. Does 1-39, inclusive, are any and all
17 individuals whose true full names are unknown
18 or not fully known to Plaintiffs, whose
19 capacities were as voting delegates to the
20 California State LULAC convention held in the
21 County of Orange on or about May 23, 2010, who
22 failed to tender payment for requisite delegate
23 fees prior to voting at said convention.

24 15. Does 40-55 are any and all individuals whose
25 true full names are not fully known to
26 Plaintiffs, but who distributed and/or
27 disseminated allegations from Exhibit 1
28 (attached and incorporated herein by reference)

1 at the LULAC California convention on or about
2 May 23, 2010.

3 16. Does 56-66 are any and all individuals who
4 purport to be lawful voting ex-officio
5 delegates and/or members of the LULAC
6 California Board of Directors by virtue of
7 their having been elected and/or appointed as
8 LULAC California State Directors during the
9 period LULAC California's Franchise Tax Board
10 suspension in 1958 up and until the restoration
11 of LULAC California's corporate status.

12 17. Does 67-150 inclusive are individuals and
13 entities whose true full names and capacities
14 are unknown or not fully known to Plaintiffs,
15 who elect to sue them under the fictitious name
16 of Doe, until such time as this Complaint can
17 be amended pursuant to Section 474 C.C.P.

18 18. The defendants and each of them in doing the
19 acts and omissions alleged herein acted as the
20 agents, employees, and/or co-conspirators of
21 each other according to a common purpose and/or
22 plan the objectives of which included but are
23 not limited to seizing control of LULAC
24 National and LULAC California and to
25 maliciously damage the reputations of those
26 opposing them by spreading falsehoods, abusing
27 their powers and authority, and by other
28 unlawful means.

