

Laurent GRANIER
1999 S. Bascom Avenue, Ste 700
CAMPBELL, CA 95008
Phone : 310 663 1519
Plaintiff, self-represented

FILED
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SUPERIOR COURT OF CALIFORNIA
ALEX CALVO, CLERK
BY REGINA ARREOLA
DEPUTY SANTA CRUZ COUNTY

SANTA CRUZ COURTHOUSE - COUNTY OF SANTA CRUZ

Laurent GRANIER,
an individual,
PLAINTIFF,

vs.

- Scott STOCKER,
as individual,
and as manager and owner of « De
Laveaga Motors Inc. »

- Andrew WHITMAN,
as individual,
and as seller at « De Laveaga Motors
Inc. »

- Joey MOCCIA,
as individual,
and as seller at « De Laveaga Motors
Inc. »

- « De Laveaga Motors Inc. »,
a corporation

- Lynn ROBINSON,
as individual and as Mayor of city of
Santa Cruz,

- Don LANE,
as individual and as Vice Mayor of city
of Santa Cruz,

- Patty HAYMOND,
as individual and as Risk Manager of
city of Santa Cruz,

- City of SANTA CRUZ,
a public administration,

- Nathan VASQUEZ,
as individual and as Police Officer at
Santa Cruz Police,

- Kevin VOGEL,
as individual and as Chief of Police of
Santa Cruz,

- Police of Santa Cruz,
a public administration,

-and DOES 1-50, inclusive

DEFENDANTS,

Case n° **CV 180228**

Complaint for

1. - EMBEZZLEMENT and UNLAWFUL WITHHOLDING of OFFICIAL DOCUMENTS
2. - ROBBERY of OFFICIAL DOCUMENTS
3. - INVOICE FRAUD
4. - UNLAWFUL FAKE and NONEXISTENT INVOICE
5. - EMBEZZLEMENT AND MISAPPROPRIATION OF PROPERTY
6. - BLACKMAILS, THREATS, ACTS of INTIMIDATIONS, PERSECUTION and INTENTIONAL INFLICTIONS OF EMOTIONAL DISTRESS
7. - SCAMS, LIES, BAD FAITH
8. - EXTORTION
9. - ROBBERY and UNLAWFUL FAKE WITHHOLDING OF PROPERTY
10. - DELIBERATE LACKS OF RESPECT FOR THE ESSENTIAL PROFESSIONAL OBLIGATIONS IN THE GOAL OF DISHONEST AND UNLAWFUL PURPOSES
11. - DELIBERATE BREACHES OF CONTRACT
12. - CORRUPTION, COLLUSION, OBSTRUCTION OF JUSTICE BY OFFICER
13. - PROFITABLE AND USEFUL PASSIVE COMPLICITY of CRIMINAL OFFENSES and of CORRUPTION, COLLUSION and OBSTRUCTION of JUSTICE, LACK OF NEUTRALITY

1 **Plaintiff, Laurent GRANIER (hereinafter « Plaintiff » or « GRANIER »)**
1 **alleges and pleads as follows:**

2
3 **The original case.**

4 Plaintiff Laurent GRANIER wanted to sell his PORSCHE 911 (vin WP0CB2969LS472037)
5 convertible of 1990. He found the dealership De Laveaga Motors Inc. located at 1215 Water St.,
6 Santa Cruz, CA 95062DE on internet, by their website <http://www.delamotors.com/>.

7 Their staff is composed by the manager and owner Scott STOCKER, and the sellers Andrew
8 WHITMAN and Joey MOCCIA.

9 They were, and are, proposing to take cars under consignment, with the terms “risk free”.

10 According their website, letting the car for sale is “risk free”, on the “consignment page”: “*Let De*
11 *Laveaga Motors sell your vehicle hassle and risk free – we’ll do that as quickly as possible and for*
12 *the best price! BENEFITS OF CONSIGNMENT: EXPOSURE Our showcase has 28,000 drive bys*
13 *daily. Advertising includes print, internet and a national dealer and customer network. Over 80% of*
14 *consigned vehicles are sold within 30 days. FINANCE The majority of cars sold are financed-we*
15 *offer competitive finance and lease options to buyers. TRADES Over 70% of buyers have trade-ins.*
16 *We offer competitive prices. Let De Laveaga Motors sell your vehicle hassle and risk free – we’ll do*
17 *that as quickly as possible and for the best price!”*

18 Laurent GRANIER went two times to this dealership, in order to meet the manager, so-called expert
19 in Porsche. The 11th of august 2014, they signed an agreement to sell the car at \$20.000 plus \$2000
20 of commission. Laurent GRANIER accepted to put the price of the car below the market, in order
21 first, to sell it quickly, and second, to do easier the task of the dealership. When they signed, Scott
22 STOCKER maliciously kept the title of the car, and gave another paper to sign, but he did not give a
23 double, a copy of it, like he did for the original agreement.

24 Laurent GRANIER discovered later that Scott STOCKER had hidden to have kept the title, and he
25 had to go back several times, meeting the sellers Andrew WHITMAN and Joey MOCCIA, to get
26 back, but unsuccessfully.

27 Laurent GRANIER discovered later that Scott STOCKER put the price of sale at \$39.990, so the
28 double of the price asked by Laurent GRANIER to sell it quickly, but worse, a price above the
29 market, and impossible to sell.

30 Laurent GRANIER discovered that Scott STOCKER used plaintiff's time and money to make more
31 money without him knowing and agreement. Worse, summer time being the best time to sell a
32 convertible has been wasted by Scott STOCKER's dishonest behaviour.

33 When Laurent GRANIER wanted to have his car back, in september 2014, Andrew WHITMAN
34 told to plaintiff that Scott STOCKER was able to buy the car, and he had just to pass by the office to
35 take the check. In fact, it was a strategy to make lose time and energy to Laurent GRANIER
36 because when plaintiff came to take the check, Scott STOCKER was not there to do it. Laurent
37 GRANIER came back another time and that time, Scott STOCKER was not there and Andrew
38 WHITMAN told to plaintiff that Scott STOCKER was not able to buy the car at this price, and if he
39 wanted to get his car back, he has to pay \$1000. As it was blackmail, robbery and scam, Laurent
40 GRANIER refused.

41 Laurent GRANIER still saw the ad about his car, posted by the band Scott STOCKER, Andrew
42 WHITMAN and Joey MOCCIA at the price of \$34990 on craigslist.

43 Laurent GRANIER came back to the dealership twice, meeting first, the of october 2014, Andrew
44 WHITMAN who told to plaintiff to pay \$1000 to get his car back, doing unlawful withholding and
45 using blackmail, and a second time, on monday 13th of october 2014, Scott STOCKER who was
46 continuing to blackmail plaintiff by threatening him to put a security bond on the title, even
47 threatening him by wanting to hit plaintiff. Scott STOCKER stopped only when Laurent GRANIER
48 told him he was recording. Scott STOCKER warned Plaintiff he was able to call Police. Laurent
49 GRANIER understood that something wrong was present in this small city like corruption of

1 authorities when a criminal dares to call the Police against his victim, or when a person is able to
2 commit several criminal offenses with no fear of justice, and continuing to do more, being not
3 afraid by authorities, as being sure to be protected by a kind of impunity. Something unlawful like
4 corruption. Plaintiff has had the confirmayion of his doubts of corruption when he tried to file a
5 criminal complaint to the Police of Santa Cruz.

6 In addition, following the blackmail and the threats made by Scott STOCKER on Laurent
7 GRANIER, plaintiff went the same day, monday 13th of october 14, to Police Station of Santa Cruz
8 to deposit a criminal complaint for blackmail, threat, scam and robbery against Scott Stocker and
9 Andrew Whitman.

10 A police officer, Nathan VASQUEZ met Plaintiff with nothing in hand, no paper, no no pen, no
11 laptop.

12 Nathan VASQUEZ did not care about the case, the situation of the Plaintiff, as he had yet in mind
13 not to report it, as he knew yet it, as he had in mind to make Plaintiff give it up, as he will not write
14 anything against the criminals, as he wanted to help the criminals by obstruction of justice. In fact,
15 he was busy by his sticking plaster (Band-Aid) at one of his finger, telling Plaintiff he can't write
16 anything, canning not to hold a pen...

17 At once, Plaintiff came to Mayor's office to warn her about corruption behaviour and obstruction of
18 justice made by a police officer under her responsibility.

19 People was good at the different offices of the City Hall until the time Plaintiff wanted to file a
20 complaint. Kristina SANTANA at the front desk refused to give him a receipt, a certificate about his
21 filing case, what is against the Law. Otherwise, the internal affairs of the city, « Risk Management
22 Office » takes 45 days to study each case, letting criminals to do what they want and they need.
23

24 At the end, Laurent GRANIER lost, first the opportunity to sell his car in summer, second to save
25 money, third to get money, fourth his car and fifth the opportunity to sell his car to clients who
26 wanted to buy it at the right price.
27
28

29 **FIRST CAUSE OF ACTION**

30 **1. - EMBEZZLEMENT and UNLAWFUL WITHHOLDING of OFFICIAL DOCUMENTS** 31 **against Scott STOCKER and DOES 1-50**

32 Maliciously, Scott STOCKER deliberately did keep unlawfully the title in order to get more
33 power and advantage on Plaintiff. He did this since the beginning, showing his dishonest purpose
34 and his aforethought unlawful goal, far and out of his professional duties, to screw Plaintiff. Scott
35 STOCKER deliberately did this against the interest of his client, Laurent GRANIER, but also for
36 his own interest, in a dishonesty, unfair, unlawful and criminal purpose, to get the car cheaper, even
37 for free. In addition, the fact to keep the title gives to Scott STOCKER an unfair increase of the
38 inequality for his benefit, having the car and his title. Scott STOCKER embezzled it unbeknown to
39 Plaintiff who discovered later that his title was missing, and he did not succeed to get it back.
40

41 **In conclusion, being against the Law by having kept illegally the title of the owner, Plaintiff,**
42 **their client, in order to get advantage later on him, Scott STOCKER did commit the**
43 **OFFENSE of UNLAWFUL WITHHOLDING of OFFICIAL DOCUMENTS.**
44

45 **Defendant used deceits, lies, ruses and omissions to Plaintiff who was his client and who**
46 **trusted him.**

47 **Plaintiff suffered stress, anxiety, worries, loss of trust which led to serious troubles in his**
48 **private and professional life, missing great opportunities, delaying and/or aborting his several**
49 **projects, in process and/or in development, by disturbing his mind which is his main tool,**
50 **being inventor, master philosopher, writer, theoretician, designer.**

1 **SECOND CAUSE OF ACTION**

2 **2. - ROBBERY of OFFICIAL DOCUMENTS**

3 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

4 Maliciously, Scott STOCKER deliberately did keep unlawfully the title in order to get more
5 power and advantage on Plaintiff. He did this since the beginning, showing his dishonest purpose
6 and his aforethought unlawful goal, far and out of his professional duties, to screw Plaintiff. Scott
7 STOCKER deliberately did this against the interest of his client, Laurent GRANIER, but also for
8 his own interest, in a dishonesty, unfair, unlawful and criminal purpose, to get the car cheaper, even
9 for free. In addition, the fact to keep the title gives to Scott STOCKER an unfair increase of the
10 inequality for his benefit, having the car and his title. Scott STOCKER embezzled it unbeknown to
11 Plaintiff who discovered later that his title was missing. When Laurent GRANIER discovered that
12 Scott STOCKER had kept his title, Plaintiff tried to get it back since the first week he let his car.
13 But after to have gone to the dealership several times, to have met Scott STOCKER, Andrew
14 WHITMAN and Joey MOCCIA, Plaintiff has not succeeded to get back his title.

15 The fact not to give back an official document is above a simple withholding because at this time, the
16 dispute to get the car back was not started. The title was stolen indeed for future purposes, dishonest
17 purposes from the band Scott STOCKER, Andrew WHITMAN and Joey MOCCIA.

18 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
19 committed by Scott STOCKER in the area of the business of « De Laveaga Motors Inc. », being
20 stakeholder of its benefits, yet as seller having commission on company income.

21 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
22 committed by Scott STOCKER by the fact they knew, they know, they are aware of what and how
23 happen « things » in this business, and they stay, still working, still getting advantage even by
24 taking part and contributing, without denouncing those criminal offenses to authorities and justice.

25
26 **In conclusion, being against the Law by refusing to give back an official document to his**
27 **owner, Plaintiff, their client, with no reason than a hidden personal future dishonest purpose,**
28 **in addition to have it embezzled it unbeknown to his owner, so against his will and agreement,**
29 **and under the aggravating circumstances of deliberate and with intent illegal acts that is not**
30 **anymore a « simple » unlawful withholding, Scott STOCKER, Andrew WHITMAN and Joey**
31 **MOCCIA did commit the OFFENSE of ROBBERY of an OFFICIAL DOCUMENT.**

32
33 **Defendants used deceits, lies, ruses and omissions to Plaintiff who was her client and who**
34 **trusted them.**

35 **Plaintiff suffered stress, anxiety, worries, loss of trust which led to serious troubles in his**
36 **private and professional life, missing great opportunities, delaying and/or aborting his several**
37 **projects, in process and/or in development, by disturbing his mind which is his main tool,**
38 **being inventor, master philosopher, writer, theoretician, designer.**

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41 **THIRD CAUSE OF ACTION**

42 **3. - INVOICE FRAUD**

43 **against Scott STOCKER, Andrew WHITMAN and DOES 1-50**

44 Scott STOCKER deliberately put a price of the Plaintiff's car above the market, twice the price of
45 the plaintiff sale price, which has led to an impossibility to sell it. By this time, two months in
46 summer, Plaintiff saw several Porsche for sale, cheaper than it, and which has been sold.

47 Maliciously, Scott STOCKER kept unlawfully the title in order to get more power and advantage
48 on plaintiff, and still maliciously, Scott STOCKER put a price for sale so high that any would-be
49 buyer did not want to consider it, in order to put in an awkward position Plaintiff. Scott STOCKER
50 had in mind his dishonest and unlawful purpose since the beginning, in order to screw Plaintiff.
51 Scott STOCKER deliberately did this against the interest of the plaintiff, but also for his own

1 interest, in a dishonesty, unfair, unlawful and criminal purpose.

2 Scott STOCKER and Andrew WHITMAN asked for \$1000 to give back his vehicle to Plaintiff.
3 The amount is not based on nothing, but a sheet of paper that Plaintiff did not remember to have
4 signed, but worse, a document that he had no copy, and so, he had not the opportunity to read and to
5 evaluate the legal value. The asked amount is a fraud, based on no one invoice, no justification.

6 We could not recognize a kind of security to be paid by « keeping » illegally and against the will
7 of the owner, made Scott STOCKER because first, the amount is not justified, not agreed but
8 contested by Plaintiff, and must be a subject of legal evaluation and discussion, and second and
9 above all, because the amount so-called due and claimed is 20 times less than the value of the car. In
10 this case, it is an extortion of money, either of property.

11
12 **In conclusion, being against the Law by asking money without no proof, no justification, no**
13 **invoice, to Plaintiff, their client, Scott STOCKER and Andrew WHITMAN did commit the**
14 **OFFENSE of INVOICE FRAUD.**

15
16 **Defendant used deceits, lies, ruses, bad faith and omissions against Plaintiff who was his**
17 **client and who trusted him.**

18 **Defendant did use and increased the Plaintiff's distress of his situation being already victim**
19 **of numerous serious criminal offenses.**

20 **Plaintiff suffered stress, anxiety, worries, loss of trust which led to serious troubles in his**
21 **private and professional life, missing great opportunities, delaying and/or aborting his several**
22 **projects, in process and/or in development, by disturbing his mind which is his main tool,**
23 **being inventor, master philosopher, writer, theoretician, designer.**

24
25

26 **FOURTH CAUSE OF ACTION**

27 **4. - UNLAWFUL FAKE and NONEXISTENT INVOICE** 28 **against Scott STOCKER, Andrew WHITMAN and DOES 1-50**

29 Scott STOCKER deliberately put a price of the Plaintiff's car above the market, twice the price of
30 the plaintiff sale price, which has led to an impossibility to sell it. By this time, two months in
31 summer, Plaintiff saw several Porsche for sale, cheaper than it, and which has been sold.

32 Maliciously, Scott STOCKER kept unlawfully the title in order to get more power and advantage
33 on plaintiff, and still maliciously, Scott STOCKER put a price for sale so high that any would-be
34 buyer did not want to consider it, in order to put in an awkward position Plaintiff. Scott STOCKER
35 had in mind his dishonest and unlawful purpose since the beginning, in order to screw Plaintiff.
36 Scott STOCKER deliberately did this against the interest of the plaintiff, but also for his own
37 interest, in a dishonesty, unfair, unlawful and criminal purpose.

38 Scott STOCKER and Andrew WHITMAN asked for \$1000 to give back his vehicle to Plaintiff.
39 The amount is not based on nothing, but a sheet of paper that Plaintiff did not remember to have
40 signed, but worse, a document that he had no copy, and so, he had not the opportunity to read and to
41 evaluate the legal value. The asked amount is a fraud, based on no real and legal justification.

42 We could not recognize a kind of security to be paid by « keeping » illegally and against the will
43 of the owner, made Scott STOCKER because first, the amount is not justified, not agreed but
44 contested by Plaintiff, and must be a subject of legal evaluation and discussion, and second and
45 above all, because the amount so-called due and claimed is 20 times less than the value of the car. In
46 this case, it is an extortion of money, either of property.

47
48 **In conclusion, being against the Law by asking money without no proof, no justification, no**
49 **invoice, to Plaintiff, their client, Scott STOCKER and Andrew WHITMAN did commit the**
50 **OFFENSE of UNLAWFUL FAKE and NONEXISTENT INVOICE.**

1 Defendant used deceits, lies, ruses, bad faith and omissions against Plaintiff who was his
2 client and who trusted him.

3 Defendant did use and increased the Plaintiff's distress of his situation being already victim
4 of numerous serious criminal offenses.

5 Plaintiff suffered stress, anxiety, worries, loss of trust which led to serious troubles in his
6 private and professional life, missing great opportunities, delaying and/or aborting his several
7 projects, in process and/or in development, by disturbing his mind which is his main tool,
8 being inventor, master philosopher, writer, theoretician, designer.

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11 **FIFTH CAUSE OF ACTION**

12 **5. - EMBEZZLEMENT AND MISAPPROPRIATION OF PROPERTY**
13 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

14 Scott STOCKER deliberately put a price of the Plaintiff's car above the market, twice the price of
15 the plaintiff sale price, which has led to an impossibility to sell it. By this time, two months in
16 summer, Plaintiff saw several Porsche for sale, cheaper than it, and which has been sold.

17 Maliciously, Scott STOCKER kept unlawfully the title in order to get more power and advantage
18 on plaintiff, and still maliciously, Scott STOCKER put a price for sale so high that any would-be
19 buyer did not want to consider it, in order to put in an awkward position Plaintiff. Scott STOCKER
20 had in mind his dishonest and unlawful purpose since the beginning, in order to screw Plaintiff.

21 Scott STOCKER and Andrew WHITMAN asked for \$1000 to give back his vehicle to Plaintiff.
22 The amount is not based on nothing, but a sheet of paper that Plaintiff did not remember to have
23 signed, but worse, a document that he had no copy, and so, he had not the opportunity to read and to
24 evaluate the legal value. The asked amount is a fraud, based on no real and legal justification.

25 Andrew WHITMAN promised several time to Laurent GRANIER to sell the car in the following
26 days, « having a client », and so, to give a check in the following days, and even the car was not
27 sold, he told to Plaintiff that Scott STOCKER was able to buy it. But indeed, Andrew WHITMAN
28 lied to Laurent GRANIER, and when it comes time to give the check, Scott STOCKER was not
29 there, and Andrew WHITMAN asked Plaintiff to come back, causing expenses to Laurent
30 GRANIER, being not in Santa Cruz area all the time. Scott STOCKER knew this from Andrew
31 WHITMAN who took advantage of this weakness of the Plaintiff not to be present all the time in
32 this area, in order to discourage, to putt off, and so to buy the car cheaper, or to get iy for free,
33 following his dishonest plan since the beginning.

34 Scott STOCKER and Andrew WHITMAN deliberately did this against the interest of the
35 plaintiff, but also for their own interest, in a dishonesty, unfair, unlawful and criminal purpose.

36 We could not recognize a kind of security to be paid by « keeping » illegally and against the will
37 of the owner, made Scott STOCKER because first, the amount is not justified, not agreed but
38 contested by Plaintiff, and must be a subject of legal evaluation and discussion, and second and
39 above all, because the amont so-called due and claimed is 20 times less than the value of the car.

40 **In this case, it is not an extortion of money, either of property, it is an embezzlement and**
41 **misappropriation of property.**

42 Andrew WHITMAN is fully accomplice by having commission on sales, and so on company
43 income. Andrew WHITMAN is fully accomplice of the criminal offenses committed by Scott
44 STOCKER in the area of the business of « De Laveaga Motors Inc. », being stakeholder of its
45 benefits, yet as seller having commission on company income.

46 Andrew WHITMAN is fully accomplice of the criminal offenses committed by Scott STOCKER
47 by the fact he knew, he knows, he is aware of what and how happen « things » in this business, and
48 he stay, still working, still getting advantage by taking part and contributing, without denouncing
49 thoss criminal offenses to authorities and justice.

1 **In conclusion, being against the Law by having kept illegally first the title of the owner,**
2 **Plaintiff, their client, and second the car with no real and legal rights, Scott STOCKER and**
3 **Andrew WHITMAN did commit the OFFENSE of EMBEZZLEMENT AND**
4 **MISAPPROPRIATION OF PROPERTY.**

5
6 **Defendants used deceits, lies, ruses, bad faith and omissions against Plaintiff who was their**
7 **client and who trusted them.**

8 **Defendants did use and increased the Plaintiff's distress of his situation being already victim**
9 **of numerous serious criminal offenses.**

10 **Plaintiff suffered stress, anxiety, worries, loss of trust which led to serious troubles in his**
11 **private and professional life, missing great opportunities, delaying and/or aborting his several**
12 **projects, in process and/or in development, by disturbing his mind which is his main tool,**
13 **being inventor, master philosopher, writer, theoretician, designer.**

14 **Plaintiff lost opportunities to sell his car, to get money, to use his money for other purposes**
15 **as investment, and in addition, he can not use his car when he needed it after his accident.**

18 **SIXTH CAUSE OF ACTION**

19 **6. - BLACKMAILS, THREATS, ACTS of INTIMIDATIONS, PERSECUTION and** 20 **INTENTIONAL INFLICTIONS OF EMOTIONAL DISTRESS**

21 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

22 Maliciously, Scott STOCKER deliberately did act unlawfully since the beginning to get power
23 and advantage on his client, Plaintiff, but not by a professional, normal, fair and honest way.
24 Maliciously, first, he kept the title, second, he refused to give it back to his owner, third, he put a
25 price of the car above the market, fourth, he put a price twice the price of the plaintiff sale price,
26 which has led to an impossibility to sell it, wasting and using only the time and investment of the
27 owner, Plaintiff. Indeed, Scott STOCKER's dishonest behaviour, which started since the beginning,
28 showing his premeditated dishonest and unlawful purpose, was to discourage Plaintiff, and so, to
29 buy it at a fraction of the value, if not for free.

30 So, Scott STOCKER used first, blackmail to get illegal, unfair, unlawful and fanciful amount of
31 \$1000, because Plaintiff refused to sell him the car cheaper, second, threats on him, by registering a
32 fanciful security on his title (which shows his connection in administration by corruption), third,
33 acts of intimidations by having the help of the police and by threatening to hit him.

34 In addition, Scott STOCKER and Andrew WHITMAN were intentionally creating, using and
35 increasing a persecution and an emotional distress to Plaintiff.

36 He did this since the beginning, showing his dishonest purpose and his goal, far and out of his
37 professional duties, to screw Plaintiff. Scott STOCKER and Andrew WHITMAN deliberately did
38 this against the interest of the plaintiff, but also for their own interest, in a dishonesty, unfair,
39 unlawful and criminal purpose.

40 We could not recognize a kind of security to be paid by « keeping » illegally and against the will
41 of the owner, made Scott STOCKER because first, the amount is not justified, not agreed but
42 contested by Plaintiff, and must be a subject of legal evaluation and discussion, and second and
43 above all, because the amount so-called due and claimed is 20 times less than the value of the car. In
44 this case, it is an extortion of money, either of property.

45 Otherwise, the « Risk Free » claimed in the website is indeed a lie, a misleading advertising, a
46 trickery in order to catch people to scam them, at least.

47 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
48 committed by Scott STOCKER in the area of the business of « De Laveaga Motors Inc. », being
49 stakeholder of its benefits, yet as seller having commission on company income.

50 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses

1 committed by Scott STOCKER by the fact they knew, they know, they are aware of what and how
2 happen « things » in this business, and they stay, still working, still getting advantage even by
3 taking part and contributing, without denouncing those criminal offenses to authorities and justice.
4

5 **In conclusion, being against the Law by having kept illegally first the title of the owner, and
6 second the car with no real and legal rights, Scott STOCKER and Andrew WHITMAN did
7 commit the OFFENSE of EMBEZZLEMENT AND MISAPPROPRIATION OF PROPERTY.**

8 **In conclusion, being against the Law by having kept illegally the title of the owner, Plaintiff,
9 their client, in order to get advantage later on him, Scott STOCKER, Andrew WHITMAN and
10 Joey MOCCIA did an OFFENSE of BLACKMAILS, THREATS, INTIMIDATIONS,
11 PERSECUTION and INTENTIONAL INFLICTIONS OF EMOTIONAL DISTRESS.**
12

13 **Defendants did not offer and guarantee to Plaintiff peace of mind quite the contrary,
14 defendant increased deliberately the difficulty of the Plaintiff's situation.**

15 **Defendants used deceits, lies, ruses, bad faith and omissions against Plaintiff who was their
16 client and who trusted them.**

17 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to
18 serious troubles in his private and professional life, missing great opportunities, delaying
19 and/or aborting his several projects, in process and/or in development, by disturbing his mind
20 which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

21 **Plaintiff lost opportunities to sell his car, to get money, to use his money for other purposes
22 as investment, and in addition, he can not use his car when he needed it after his accident.**
23
24

25 **SEVENTH CAUSE OF ACTION**

26 **7. -SCAMS, LIES, BAD FAITH**

27 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

28 Maliciously, Scott STOCKER deliberately did act unlawfully since the beginning to get power
29 and advantage on his client, Plaintiff, but not by a professional, normal, fair and honest way.
30 Maliciously, first, he kept the title, second, he refused to give it back to his owner, third, he put a
31 price of the car above the market, fourth, he put a price twice the price of the plaintiff sale price,
32 which has led to an impossibility to sell it, wasting and using only the time and investment of the
33 owner, Plaintiff. Indeed, Scott STOCKER's dishonest behaviour, which started since the beginning,
34 showing his premeditated dishonest and unlawful purpose, was to discourage Plaintiff, and so, to
35 buy it at a fraction pf the value, if not for free.

36 So, Scott STOCKER used first, blackmail to get illegal, unfair, unlawful and fanciful amount of
37 \$1000, because Plaintiff refused to sell him the car cheaper, second, threats on him, by registering a
38 fanciful security on his title (which shows his connection in administration by corruption), third,
39 acts of intimidations by having the help of the police and by threatening to hit him.

40 In addition, Scott STOCKER and Andrew WHITMAN were intentionally creating, using and
41 increasing a persecution and an emotional distress to Plaintiff.

42 He did this since the beginning, showing his dishonest purpose and his goal, far and out of his
43 professional duties, to screw Plaintiff. Scott STOCKER and Andrew WHITMAN deliberately did
44 this against the interest of the plaintiff, but also for their own interest, in a dishonesty, unfair,
45 unlawful and criminal purpose.

46 We could not recognize a kind of security to be paid by « keeping » illegally and against the will
47 of the owner, made Scott STOCKER because first, the amount is not justified, not agreed but
48 contested by Plaintiff, and must be a subject of legal evaluation and discussion, and second and
49 above all, because the amont so-called due and claimed is 20 times less than the value of the car. In
50 this case, it is an extortion of money, either of property.

1 Otherwise, the « Risk Free » claimed in the website is indeed a lie, a misleading advertising, a
2 trickery in order to catch people to scam them, at least.

3 **So, the purpose of Scott STOCKER since the beginning was to screw Plaintiff, if it was not**
4 **to steal his car by fake official ways, thanks to his « connections » who give him impunity.**
5 **Scott STOCKER got the help and the assistance from Andrew WHITMAN who was deeply**
6 **involved by taking part of his unlawful acts, being fully aware of the numerous criminal**
7 **offenses did by Scott STOCKER but also by himself, both using lies and bad faith.**

8 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
9 committed by Scott STOCKER in the area of the business of « De Laveaga Motors Inc. », being
10 stakeholder of its benefits, yet as seller having commission on company income.

11 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
12 committed by Scott STOCKER by the fact they knew, they know, they are aware of what and how
13 happen « things » in this business, and they stay, still working, still getting advantage even by
14 taking part and contributing, without denouncing those criminal offenses to authorities and justice.
15

16 **In conclusion, being against the Law by having kept illegally first the title of the owner, and**
17 **second the car with no real and legal rights, by using lies and bad faith to Plaintiff, their**
18 **client, in order to get advantage later on him, Scott STOCKER, Andrew WHITMAN and Joey**
19 **MOCCIA did commit the OFFENSE of SCAMS, LIES, BAD FAITH.**
20

21 **Defendants did not offer and guarantee to Plaintiff peace of mind quite the contrary,**
22 **defendant increased deliberately the difficulty of the Plaintiff's situation.**

23 **Defendants used deceits, lies, ruses, bad faith and omissions against Plaintiff who was their**
24 **client and who trusted them.**

25 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to serious**
26 **troubles in his private and professional life, missing great opportunities, delaying and/or**
27 **aborting his several projects, in process and/or in development, by disturbing his mind which**
28 **is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

29 **Plaintiff lost opportunities to sell his car, to get money, to use his money for other purposes as**
30 **investment, and in addition, he can not use his car when he needed it after his accident.**
31
32

33 **EIGHT CAUSE OF ACTION**

34 **8. - EXTORTION**

35 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

36 Maliciously, Scott STOCKER deliberately did act unlawfully since the beginning to get power
37 and advantage on his client, Plaintiff, but not by a professional, normal, fair and honest way.
38 Maliciously, first, he kept the title, second, he refused to give it back to his owner, third, he put a
39 price of the car above the market, fourth, he put a price twice the price of the plaintiff sale price,
40 which has led to an impossibility to sell it, wasting and using only the time and investment of the
41 owner, Plaintiff. Indeed, Scott STOCKER's dishonest behaviour, which started since the beginning,
42 showing his premeditated dishonest and unlawful purpose, was to discourage Plaintiff, and so, to
43 buy it at a fraction of the value, if not for free.

44 So, Scott STOCKER used first, blackmail to get illegal, unfair, unlawful and fanciful amount of
45 \$1000, because Plaintiff refused to sell him the car cheaper, second, threats on him, by registering a
46 fanciful security on his title (which shows his connection in administration by corruption), third,
47 acts of intimidations by having the help of the police and by threatening to hit him.

48 In addition, Scott STOCKER and Andrew WHITMAN were intentionally creating, using and
49 increasing a persecution and an emotional distress to Plaintiff.

50 He did this since the beginning, showing his dishonest purpose and his goal, far and out of his

1 professional duties, to screw Plaintiff. Scott STOCKER and Andrew WHITMAN deliberately did
2 this against the interest of the plaintiff, but also for their own interest, in a dishonesty, unfair,
3 unlawful and criminal purpose.

4 We could not recognize a kind of security to be paid by « keeping » illegally and against the will
5 of the owner, made Scott STOCKER because first, the amount is not justified, not agreed but
6 contested by Plaintiff, and must be a subject of legal evaluation and discussion, and second and
7 above all, because the amount so-called due and claimed is 20 times less than the value of the car.

8 Otherwise, the « Risk Free » claimed in the website is indeed a lie, a misleading advertising, a
9 trickery in order to catch people to scam them, at least.

10 **In this case, it is an extortion of money, either of property.**

11 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
12 committed by Scott STOCKER in the area of the business of « De Laveaga Motors Inc. », being
13 stakeholder of its benefits, yet as seller having commission on company income.

14 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
15 committed by Scott STOCKER by the fact they knew, they know, they are aware of what and how
16 happen « things » in this business, and they stay, still working, still getting advantage even by
17 taking part and contributing, without denouncing those criminal offenses to authorities and justice.

18 **In conclusion, being against the Law by having kept illegally first the title of the owner, and
19 second the car with no real and legal rights, and by asking to Plaintiff, their client, a fanciful
20 amount which is a ransom, Scott STOCKER, Andrew WHITMAN and Joey MOCCIA did
21 commit the OFFENSE of EXTORTION.**

22
23 **Defendants did not offer and guarantee to Plaintiff peace of mind quite the contrary,
24 defendant increased deliberately the difficulty of the Plaintiff's situation.**

25 **Defendants used deceits, lies, ruses, bad faith and omissions against Plaintiff who was their
26 client and who trusted them.**

27 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to serious
28 troubles in his private and professional life, missing great opportunities, delaying and/or
29 aborting his several projects, in process and/or in development, by disturbing his mind which
30 is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

31 **Plaintiff lost opportunities to sell his car, to get money, to use his money for other purposes as
32 investment, and in addition, he can not use his car when he needed it after his accident.**

33 34 35 **NINTH CAUSE OF ACTION**

36 **9. - ROBBERY and UNLAWFUL FAKE WITHHOLDING OF PROPERTY** 37 **against Scott STOCKER, Andrew WHITMAN and Joey MOCCIA and DOES 1-50**

38 Maliciously, Scott STOCKER deliberately did act unlawfully since the beginning to get power
39 and advantage on his client, Plaintiff, but not by a professional, normal, fair and honest way.
40 Maliciously, first, he kept the title, second, he refused to give it back to his owner, third, he put a
41 price of the car above the market, fourth, he put a price twice the price of the plaintiff sale price,
42 which has led to an impossibility to sell it, wasting and using only the time and investment of the
43 owner, Plaintiff. Indeed, Scott STOCKER's dishonest behaviour, which started since the beginning,
44 showing his premeditated dishonest and unlawful purpose, was to discourage Plaintiff, and so, to
45 buy it at a fraction of the value, if not for free.

46 So, Scott STOCKER used first, blackmail to get illegal, unfair, unlawful and fanciful amount of
47 \$1000, because Plaintiff refused to sell him the car cheaper, second, threats on him, by registering a
48 fanciful security on his title (which shows his connection in administration by corruption), third,
49 acts of intimidations by having the help of the police and by threatening to hit him.

50 In addition, Scott STOCKER and Andrew WHITMAN were intentionally creating, using and

1 increasing a persecution and an emotional distress to Plaintiff.

2 He did this since the beginning, showing his dishonest purpose and his goal, far and out of his
3 professional duties, to screw Plaintiff. Scott STOCKER and Andrew WHITMAN deliberately did
4 this against the interest of the plaintiff, but also for their own interest, in a dishonesty, unfair,
5 unlawful and criminal purpose.

6 We could not recognize a kind of security to be paid by « keeping » illegally and against the will
7 of the owner, made Scott STOCKER because first, the amount is not justified, not agreed but
8 contested by Plaintiff, and must be a subject of legal evaluation and discussion, and second and
9 above all, because the amount so-called due and claimed is 20 times less than the value of the car. In
10 this case, it is an extortion of money, either of property.

11 Otherwise, the « Risk Free » claimed in the website is indeed a lie, a misleading advertising, a
12 trickery in order to catch people to scam them, at least.

13 **So, it is not a withholding property anymore, but just a kind of fake justification to get the**
14 **car as « officially » not stolen. Indeed, the owner can not get it back, car and title, from them**
15 **without to be forced to pay a ransom. It is a robbery.**

16 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
17 committed by Scott STOCKER in the area of the business of « De Laveaga Motors Inc. », being
18 stakeholder of its benefits, yet as seller having commission on company income.

19 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
20 committed by Scott STOCKER by the fact they knew, they know, they are aware of what and how
21 happen « things » in this business, and they stay, still working, still getting advantage even by
22 taking part and contributing, without denouncing those criminal offenses to authorities and justice.
23

24 **In conclusion, being against the Law by having kept illegally first the title of the owner, and**
25 **second the car with no real and legal rights, and by asking to Plaintiff, their client, a fanciful**
26 **amount which is a ransom, Scott STOCKER, Andrew WHITMAN and Joey MOCCIA did**
27 **commit the OFFENSE of ROBBERY and UNLAWFUL FAKE WITHHOLDING OF**
28 **PROPERTY.**

29
30 **Defendants did not offer and guarantee to Plaintiff peace of mind quite the contrary,**
31 **defendants increased deliberately the difficulty of the Plaintiff's situation.**

32 **Defendants used deceits, lies, ruses, bad faith and omissions against Plaintiff who was their**
33 **client and who trusted them.**

34 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to serious**
35 **troubles in his private and professional life, missing great opportunities, delaying and/or**
36 **aborting his several projects, in process and/or in development, by disturbing his mind which**
37 **is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

38 **Plaintiff lost opportunities to sell his car, to get money, to use his money for other purposes**
39 **as investment, and in addition, he can not use his car when he needed it after his accident.**
40
41

42 TENTH CAUSE OF ACTION

43 **10. - DELIBERATE LACKS OF RESPECT FOR THE ESSENTIAL PROFESSIONAL** 44 **OBLIGATIONS IN THE GOAL OF DISHONEST AND UNLAWFUL PURPOSES**

45 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

46 Maliciously, Scott STOCKER deliberately did act unlawfully since the beginning to get power
47 and advantage on his client, Plaintiff, but not by a professional, normal, fair and honest way.
48 Maliciously, first, he kept the title, second, he refused to give it back to his owner, third, he put a
49 price of the car above the market, fourth, he put a price twice the price of the plaintiff sale price,
50 which has led to an impossibility to sell it, wasting and using only the time and investment of the

1 owner, Plaintiff. Indeed, Scott STOCKER's dishonest behaviour, which started since the beginning,
2 showing his premeditated dishonest and unlawful purpose, was to discourage Plaintiff, and so, to
3 buy it at a fraction of the value, if not for free.

4 In addition, Scott STOCKER and Andrew WHITMAN were intentionally creating, using and
5 increasing a persecution and an emotional distress to Plaintiff.

6 Scott STOCKER did this since the beginning, showing his dishonest purpose and his goal, far
7 and out of his professional duties, to screw Plaintiff.

8 **Otherwise, the « Risk Free » claimed in the website is indeed a lie, a misleading advertising,
9 a trickery in order to catch people to scam them, at least.**

10 **Scott STOCKER and Andrew WHITMAN deliberately did act against the interest of the
11 plaintiff, but also for their own interest, in a dishonesty, unfair, unlawful and criminal
12 purpose. Scott STOCKER and Andrew WHITMAN deliberately did act against the interest of
13 the plaintiff, but also for their own interest, in a dishonesty, unfair, unlawful and criminal
14 purpose, by not respecting their professional obligations to sell the car as soon as possible, at
15 the price asked by Plaintiff. They even never gave him any update.**

16 **Scott STOCKER and Andrew WHITMAN put a price higher than the market to put in
17 difficulty Plaintiff facing an unsuccessful sale.**

18 **Otherwise, if they have succeeded to sell the car at a higher price than the one asked by the
19 owner, Plaintiff, they could make more money than the \$2000 of commission. Indeed, they
20 were using the time and the investment of Plaintiff, without his agreement, and without his
21 knowledge. Scott STOCKER and Andrew WHITMAN deliberately acted for their own
22 interest, with the property of Plaintiff, and to the exclusive detriment of Plaintiff.**

23 **Those acts and behaviours from professionals can not be considered as a respect of terms of
24 agreement for a consignment.**

25 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
26 committed by Scott STOCKER in the area of the business of « De Laveaga Motors Inc. », being
27 stakeholder of its benefits, yet as seller having commission on company income.

28 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
29 committed by Scott STOCKER by the fact they knew, they know, they are aware of what and how
30 happen « things » in this business, and they stay, still working, still getting advantage even by
31 taking part and contributing, without denouncing those criminal offenses to authorities and justice.
32

33 **In conclusion, being against the Law by having deliberately acted against the Law and
34 against the interest of Plaintiff, their client, Scott STOCKER, Andrew WHITMAN and Joey
35 MOCCIA did commit the OFFENSE of DELIBERATE LACKS OF RESPECT FOR THE
36 ESSENTIAL PROFESSIONAL OBLIGATIONS IN THE GOAL OF DISHONEST AND
37 UNLAWFUL PURPOSES.**

38
39 **Defendants did not offer and guarantee to Plaintiff peace of mind quite the contrary,
40 defendants increased deliberately the difficulty of the Plaintiff's situation.**

41 **Defendants used deceptions, lies, ruses, bad faith and omissions against Plaintiff who was their
42 client and who trusted them.**

43 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to
44 serious troubles in his private and professional life, missing great opportunities, delaying
45 and/or aborting his several projects, in process and/or in development, by disturbing his mind
46 which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

47 **Plaintiff lost opportunities to sell his car, to get money, to use his money for other purposes
48 as investment, and in addition, he can not use his car when he needed it after his accident.**
49
50

1 **ELEVENTH CAUSE OF ACTION**

2 **11. - DELIBERATE BREACHES OF CONTRACT**

3 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

4 Maliciously, Scott STOCKER deliberately did act unlawfully since the beginning to get power
5 and advantage on his client, Plaintiff, but not by a professional, normal, fair and honest way.
6 Maliciously, first, he kept the title, second, he refused to give it back to his owner, third, he put a
7 price of the car above the market, fourth, he put a price twice the price of the plaintiff sale price,
8 which has led to an impossibility to sell it, wasting and using only the time and investment of the
9 owner, Plaintiff. Indeed, Scott STOCKER's dishonest behaviour, which started since the beginning,
10 showing his premeditated dishonest and unlawful purpose, was to discourage Plaintiff, and so, to
11 buy it at a fraction pf the value, if not for free.

12 In addition, Scott STOCKER and Andrew WHITMAN were intentionally creating, using and
13 increasing a persecution and an emotional distress to Plaintiff.

14 He did this since the beginning, showing his dishonest purpose and his goal, far and out of his
15 professional duties, to screw Plaintiff.

16 **Otherwise, the « Risk Free » claimed in the website is indeed a lie, a misleading advertising,**
17 **a trickery in order to catch people to scam them, at least.**

18 **Scott STOCKER and Andrew WHITMAN deliberately did act against the interest of the**
19 **plaintiff, but also for their own interest, in a dishonesty, unfair, unlawful and criminal**
20 **purpose, by not respecting their professional obligations to sell the car as soon as possible, at**
21 **the price asked by Plaintiff. They even never gave him any update.**

22 **Scott STOCKER and Andrew WHITMAN put a price higher than the market to put in**
23 **difficulty Plaintiff facing an unsuccessful sale.**

24 **Otherwise, if they have succeeded to sell the car at a hihger price than the one asked by the**
25 **owner, Plaintiff, they could make more money than the \$2000 of commission. Indeed, they**
26 **were using the time and the investment of Plaintiff, without his agreement, and without his**
27 **knowledge. Scott STOCKER and Andrew WHITMAN deliberately acted for their own**
28 **interest, with the property of Plaintiff, and to the exclusive detriment of Plaintiff.**

29 **Those acts and behaviours from professionals can not be terms of agreement for a**
30 **consignment.**

31 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
32 committed by Scott STOCKER in the area of the business of « De Laveaga Motors Inc. », being
33 stakeholder of its benefits, yet as seller having commission on company income.

34 Andrew WHITMAN and Joey MOCCIA are fully accomplices of the criminal offenses
35 committed by Scott STOCKER by the fact they knew, they know, they are aware of what and how
36 happen « things » in this business, and they stay, still working, still getting advantage even by
37 taking part and contributing, without denouncing those criminal offenses to authorities and justice.
38

39 **In conclusion, by having deliberately acted against the Law and against the interest of their**
40 **client, Plaintiff, but for only their own interest, by not respecting normal terms of an**
41 **agreement for consignment, Scott STOCKER, Andrew WHITMAN and Joey MOCCIA did**
42 **commit the OFFENSE of DELIBERATE BREACHES OF CONTRACT.**

44 **Defendants did not offer and guarantee to Plaintiff peace of mind quite the contrary,**
45 **defendants increased deliberately the difficulty of the Plaintiff's situation.**

46 **Defendants used deceits, lies, ruses, bad faith and omissions against Plaintiff who was their**
47 **client and who trusted them.**

48 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
49 **serious troubles in his private and professional life, missing great opportunities, delaying**
50 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**

1 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

2 **Plaintiff lost opportunities to sell his car, to get money, to use his money for other purposes**
3 **as investment, and in addition, he can not use his car when he needed it after his accident.**

4
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6 **TWELFTH CAUSE OF ACTION**

7 **12. - CORRUPTION, COLLUSION, OBSTRUCTION OF JUSTICE BY OFFICER**
8 **against Nathan VASQUEZ and DOES 1-50**

9 Corruption phenomenon is not only an exchange of money, a payment for a « service ». Most of
10 time, it is under the hidden shape of an advantage in nature, in exchange, in return for another
11 service, or a compliance, an obedience to a membership privilege.

12 Following the blackmail and the threats made by Scott STOCKER on Laurent GRANIER,
13 plaintiff went the same day, monday 13th of october 2014, around 10.30 am, to Police Station of
14 Santa Cruz located at 155 Center St, in order to get assistance and help, but also and above all, to
15 file a criminal complaint for blackmail, threat, extortion, scam and robbery against Scott Stocker
16 and Andrew Whitman.

17 A police officer, Nathan VASQUEZ met Plaintiff with nothing in hand, no paper, no no pen, no
18 laptop.

19 Nathan VASQUEZ did not care about the case, the situation of the victim, Plaintiff, as he had yet in
20 mind not to report it, as he knew yet it, as he had in mind to make Plaintiff give it up, as he will not
21 write anything against the criminals, as he wanted to help the criminals by obstruction of justice. In
22 fact, he was busy by his sticking plaster (Band-Aid) at one of his finger, telling Plaintiff he can't
23 write anything, canning not to hold a pen...

24 Plaintiff tried to find help and assistance from Police of Santa Cruz, and to file a criminal complaint
25 in order to obtain an official criminal lawsuit made by the prosecutor, but indeed, he found a
26 deliberate fake lazy behaviour from the police officer, a passive unlawful behaviour useful for
27 criminals who can continue to commit criminal offenses with complete impunity, guaranted by
28 authorities. Criminals can continue to do blackmail, threat, extortion, scam and robbery against
29 Laurent GRANIER, Plaintiff, but against other victims, too.

30 If a little officer is able to do a so serious criminal offense, it is because he is sure to be protected by
31 his hierarchy, so by Kevin VOGEL, Chief of Police of Santa Cruz, becoming accomplice of
32 corruption, collusion and obstruction of justice.

33
34 **In conclusion, being against the Law by giving deliberately leeways in time to criminals, by**
35 **deliberately not taking in consideration the situation of the victim, Plaintiff, by being**
36 **deliberately disrespectful towards the victim, Plaintiff, by deliberately increasing damages**
37 **and situation of the victim, Plaintiff, by deliberately not giving help, assistance and protection**
38 **to victim, Plaintiff, by ignoring the requests of the victim, Plaintiff, to file a criminal**
39 **complaint, by being fully passive accomplice of blackmail, threat, extortion, scam and**
40 **robberyby, Nathan VASQUEZ did commit, under the aggravating circumstances of being a**
41 **Police Officer, the SERIOUS CRIMINAL OFFENSES of CORRUPTION, COLLUSION,**
42 **OBSTRUCTION OF JUSTICE by OFFICER.**

43
44 **Defendant used deceits, lies, ruses, bad faith and omissions against Plaintiff who trusted**
45 **him, being a representative of authorities.**

46 **Defendant did use and increased the Plaintiff's distress of his situation being already victim**
47 **of numerous serious criminal offenses.**

48 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
49 **serious troubles in his private and professional life, missing great opportunities, delaying**
50 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**

1 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

2 **Plaintiff lost opportunities to sell his car, to get money, to use his money for other purposes**
3 **as investment, and in addition, he can not use his car when he needed it after his accident.**

4
5
6 **THIRTEENTH CAUSE OF ACTION**

7 **13. - PROFITABLE AND USEFUL PASSIVE COMPLICITY of CRIMINAL OFFENSES**
8 **and of CORRUPTION, COLLUSION and OBSTRUCTION of JUSTICE, LACK OF**
9 **NEUTRALITY**

10 **against Lynn ROBINSON, Don LANE, Patty HAYMOND, Nathan VASQUEZ, Kevin VOGEL and**
11 **DOES 1-50**

12 Plaintiff tried to find help and assistance from Police of Santa Cruz, and to file a criminal complaint
13 in order to obtain an official criminal lawsuit made by the prosecutor, but indeed, he found a
14 deliberate fake lazy behaviour from the police officer, a passive unlawful behaviour useful for
15 criminals who can continue to commit criminal offenses with complete impunity, guaranteed by
16 authorities. Criminals can continue to do blackmail, threat, extortion, scam and robbery against
17 Laurent GRANIER, Plaintiff, but against other victims, too.

18 If a little officer is able to do a so serious criminal offense, it is because he is sure to be protected by
19 his hierarchy, so by Kevin VOGEL, Chief of Police of Santa Cruz, becoming accomplice of
20 corruption, collusion and obstruction of justice.

21 At once, Plaintiff came to Mayor's office to warn her about corruption behaviour and obstruction of
22 justice made by a police officer under her responsibility.

23 People was good at the different offices of the City Hall until the time Plaintiff wanted to file a
24 complaint. Kristina SANTANA at the front desk refused to give him a receipt, a certificate about his
25 filing case, what is against the Law.

26 Otherwise, the internal affairs of the city, « Risk Management Department » takes 45 days to
27 study each case, letting criminals to do what they want and they need, and by the same time, letting
28 increasing the damages and the difficulty of the situation of the victim. Indeed, this « Risk
29 Management department» is a trickery, because it is not to help victims, it is not to avoid offenses
30 made by city employees, but just a way to win time, in order to analyze the situation if they can be
31 exempted of responsibility, if they could protect themselves from any lawsuit, and so, always for
32 their own benefit, and always to the detriment of victims. Patty HAYMOND is the manager of this
33 office.

34 Lynn ROBINSON, being Mayor of the city of Santa Cruz and Don LANE being vice-mayor are
35 responsables for the misconducts of their employees.

36 Laurent GRANIER, victim, Plaintiff, sent to each of them an email to warn them about the
37 situation. None of them replied. So, in addition of Kevin VOGEL, Lynn ROBINSON, Don LANE
38 and Patty HAYMOND are fully responsible, and are fully accomplice of CORRUPTION,
39 COLLUSION and OBSTRUCTION of JUSTICE, but also, indirectly, of blackmail, threat,
40 extortion, scam and robbery.

41
42 **In conclusion, being against the Law by giving deliberately leeways in time to criminals, by**
43 **deliberately not taking in consideration the situation of the victim, Plaintiff, by being**
44 **deliberately disrespectful towards the victim, Plaintiff, by deliberately increasing damages**
45 **and situation of the victim, Plaintiff, by deliberately not giving help, assistance and protection**
46 **to victim, Plaintiff, by ignoring the requests of the victim, Plaintiff, by not doing the necessary**
47 **to give the possibility to file a criminal complaint about blackmail, threat, extortion, scam and**
48 **robberyby, Kevin VOGEL, Lynn ROBINSON, Don LANE and Patty HAYMOND did**
49 **commit, under the aggravating circumstances of being official representative of the**
50 **authorities, the SERIOUS CRIMINAL OFFENSES of PROFITABLE AND USEFUL**

1 **PASSIVE COMPLICITY OF CRIMINAL OFFENSES and of CORRUPTION, COLLUSION**
2 **and OBSTRUCTION of JUSTICE, LACK OF NEUTRALITY.**

3
4 **Defendants used deceits, lies, ruses, bad faith and omissions against Plaintiff who trusted**
5 **them as the only one and highest authorities.**

6 **Defendants did use and increased the Plaintiff's distress of his situation being already victim**
7 **of numerous serious criminal offenses.**

8 **Plaintiff suffered stress, anxiety, worries, loss of trust in his representative which led to**
9 **serious troubles in his private and professional life, missing great opportunities, delaying**
10 **and/or aborting his several projects, in process and/or in development, by disturbing his mind**
11 **which is his main tool, being inventor, master philosopher, writer, theoretician, designer.**

12 **Plaintiff lost opportunities to sell his car, to get money, to use his money for other purposes**
13 **as investment, and in addition, he can not use his car when he needed it after his accident.**

14
15
16
17 **PRAYER FOR RELIEF**

18
19 **On the FIRST CAUSE OF ACTION**

20 **1. - EMBEZZLEMENT and UNLAWFUL WITHHOLDING of OFFICIAL DOCUMENTS**
21 **against Scott STOCKER and DOES 1-50**

- 22 1. For an order declaring the offenses committed by Defendant against Plaintiff ;
23 2. For actual damages to Plaintiff in an amount according to proof at trial;
24 3. For interest thereon at the maximum legally permissible rate;
25 4. For punitive damages in an amount of not less than \$10,000 for each of Defendants'
26 retaliatory acts;
27 5. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
28 caused by Defendant in an amount of not less than \$100.000 ;
29 6. For all costs of suit incurred herein; and
30 7. For such other and further relief as deemed just and proper.

31
32
33 **On the SECOND CAUSE OF ACTION**

34 **2. - ROBBERY of OFFICIAL DOCUMENTS**

35 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

- 36 1. For an order declaring the offenses committed by each Defendant against Plaintiff ;
37 2. For actual damages to Plaintiff in an amount according to proof at trial;
38 3. For interest thereon at the maximum legally permissible rate;
39 4. For punitive damages in an amount of not less than \$10,000 for each of Defendants'
40 retaliatory acts;
41 5. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
42 caused by Defendant in an amount of not less than \$100.000 ;
43 6. For all costs of suit incurred herein; and
44 7. For such other and further relief as deemed just and proper.

45
46
47 **On the THIRD CAUSE OF ACTION**

48 **3. - INVOICE FRAUD**

49 **against Scott STOCKER, Andrew WHITMAN and DOES 1-50**

- 50 1. For an order declaring the offenses committed by each Defendant against Plaintiff ;
51 2. For actual damages to Plaintiff in an amount according to proof at trial;

3. For interest thereon at the maximum legally permissible rate;
4. For punitive damages in an amount of not less than \$10,000 for each of Defendants' retaliatory acts;
5. For pain and suffering about moral exhaustion, nervous prostration and emotional distress caused by Defendant in an amount of not less than \$100.000 ;
6. For all costs of suit incurred herein; and
7. For such other and further relief as deemed just and proper.

On the FOURTH CAUSE OF ACTION

**4. - UNLAWFUL FAKE and NONEXISTENT INVOICE
against Scott STOCKER, Andrew WHITMAN and DOES 1-50**

1. For an order declaring the offenses committed by each Defendant against Plaintiff ;
2. For actual damages to Plaintiff in an amount according to proof at trial;
3. For interest thereon at the maximum legally permissible rate;
4. For punitive damages in an amount of not less than \$10,000 for each of Defendants' retaliatory acts;
5. For pain and suffering about moral exhaustion, nervous prostration and emotional distress caused by Defendant in an amount of not less than \$100.000 ;
6. For all costs of suit incurred herein; and
7. For such other and further relief as deemed just and proper.

On the FIFTH CAUSE OF ACTION

**5. - EMBEZZLEMENT AND MISAPPROPRIATION OF PROPERTY
against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

1. For an order declaring the offenses committed by each Defendant against Plaintiff ;
2. For an order declaring that Defendants have sold the car or have the obligation to pay it to Plaintiff ;
3. For an order declaring that Defendants have to pay the car the price they put for sale, so \$34,990 ;
4. For punitive damages in an amount of not less than \$10,000 for each of Defendants' retaliatory acts ;
5. For pain and suffering about moral exhaustion, nervous prostration and emotional distress caused by Defendant in an amount of not less than \$100.000 ;
6. For a principal sum of \$1.000.000 ;
7. For retributory damages in a amount of \$10.000.000, according pain and suffering Defendants did on Plaintiff, with the aggravating factor that Defendants took advantage by his professional position and have deliberately failed their main duty ;
8. For actual damages to Plaintiff in an amount according to proof at trial;
9. For interest thereon at the maximum legally permissible rate;
10. For all costs of suit incurred herein; and
11. For such other and further relief as deemed just and proper.

On the SIXTH CAUSE OF ACTION

**6. - BLACKMAILS, THREATS, ACTS of INTIMIDATIONS, PERSECUTION and
INTENTIONAL INFLICTIONS OF EMOTIONAL DISTRESS
against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

1. For an order declaring the offenses committed by each Defendant against Plaintiff ;
2. For an order declaring that Defendants have sold the car or have the obligation to pay it to

- 1 Plaintiff ;
2 3. For an order declaring that Defendants have to pay the car the price they put for sale, so
3 \$34,990 ;
4 4. For punitive damages in an amount of not less than \$10,000 for each of Defendants'
5 retaliatory acts;
6 5. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
7 caused by Defendant in an amount of not less than \$100.000 ;
8 6. For a principal sum of \$1.000.000 ;
9 7. For retributory damages in a amount of \$10.000.000, according pain and suffering
10 Defendants did on Plaintiff, with the aggravating factor that Defendants took advantage by
11 his professional position and have deliberately failed their main duty ;
12 8. For actual damages to Plaintiff in an amount according to proof at trial;
13 9. For interest thereon at the maximum legally permissible rate;
14 10. For all costs of suit incurred herein; and
15 11. For such other and further relief as deemed just and proper.
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18 **On the SEVENTH CAUSE OF ACTION**

19 **7. - SCAMS, LIES, BAD FAITH**

20 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

- 21 1. For an order declaring the offenses committed by each Defendant against Plaintiff ;
22 2. For an order declaring that Defendants have sold the car or have the obligation to pay it to
23 Plaintiff ;
24 3. For an order declaring that Defendants have to pay the car the price they put for sale, so
25 \$34,990 ;
26 4. For punitive damages in an amount of not less than \$10,000 for each of Defendants'
27 retaliatory acts ;
28 5. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
29 caused by Defendant in an amount of not less than \$100.000 ;
30 6. For a principal sum of \$1.000.000 ;
31 7. For retributory damages in a amount of \$10.000.000, according pain and suffering
32 Defendants did on Plaintiff, with the aggravating factor that Defendants took advantage by
33 his professional position and have deliberately failed their main duty ;
34 8. For actual damages to Plaintiff in an amount according to proof at trial;
35 9. For interest thereon at the maximum legally permissible rate;
36 10. For all costs of suit incurred herein; and
37 11. For such other and further relief as deemed just and proper.
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40 **On the EIGHT CAUSE OF ACTION**

41 **8. - EXTORTION**

42 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

- 43 1. For an order declaring the offenses committed by each Defendant against Plaintiff ;
44 2. For an order declaring that Defendants have sold the car or have the obligation to pay it to
45 Plaintiff ;
46 3. For an order declaring that Defendants have to pay the car the price they put for sale, so
47 \$34,990 ;
48 4. For punitive damages in an amount of not less than \$10,000 for each of Defendants'
49 retaliatory acts ;
50 5. For pain and suffering about moral exhaustion, nervous prostration and emotional distress

- 1 caused by Defendant in an amount of not less than \$100.000 ;
- 2 6. For a principal sum of \$1.000.000 ;
- 3 7. For retributory damages in a amount of \$10.000.000, according pain and suffering
- 4 Defendants did on Plaintiff, with the aggravating factor that Defendants took advantage by
- 5 his professional position and have deliberately failed their main duty ;
- 6 8. For actual damages to Plaintiff in an amount according to proof at trial;
- 7 9. For interest thereon at the maximum legally permissible rate;
- 8 10. For all costs of suit incurred herein; and
- 9 11. For such other and further relief as deemed just and proper.

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12 **On the NINTH CAUSE OF ACTION**

13 **9. - ROBBERY and UNLAWFUL FAKE WITHHOLDING OF PROPERTY**
14 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

- 15 1. For an order declaring the offenses committed by each Defendant against Plaintiff ;
- 16 2. For an order declaring that Defendants have sold the car or have the obligation to pay it to
- 17 Plaintiff ;
- 18 3. For an order declaring that Defendants have to pay the car the price they put for sale, so
- 19 \$34,990 ;
- 20 4. For punitive damages in an amount of not less than \$10,000 for each of Defendants'
- 21 retaliatory acts ;
- 22 5. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
- 23 caused by Defendant in an amount of not less than \$100.000 ;
- 24 6. For a principal sum of \$1.000.000 ;
- 25 7. For retributory damages in a amount of \$10.000.000, according pain and suffering
- 26 Defendants did on Plaintiff, with the aggravating factor that Defendants took advantage by
- 27 his professional position and have deliberately failed their main duty ;
- 28 8. For actual damages to Plaintiff in an amount according to proof at trial;
- 29 9. For interest thereon at the maximum legally permissible rate;
- 30 10. For all costs of suit incurred herein; and
- 31 11. For such other and further relief as deemed just and proper.

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34 **On the TENTH CAUSE OF ACTION**

35 **10. - DELIBERATE LACKS OF RESPECT FOR THE ESSENTIAL PROFESSIONAL**
36 **OBLIGATIONS IN THE GOAL OF DISHONEST AND UNLAWFUL PURPOSES**

37 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

- 38 1. For an order declaring the offenses committed by each Defendant against Plaintiff ;
- 39 2. For an order declaring that Defendants have sold the car or have the obligation to pay it to
- 40 Plaintiff ;
- 41 3. For an order declaring that Defendants have to pay the car the price they put for sale, so
- 42 \$34,990 ;
- 43 4. For punitive damages in an amount of not less than \$10,000 for each of Defendants'
- 44 retaliatory acts;
- 45 5. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
- 46 caused by Defendant in an amount of not less than \$100.000 ;
- 47 6. For a principal sum of \$1.000.000 ;
- 48 7. For retributory damages in a amount of \$10.000.000, according pain and suffering
- 49 Defendants did on Plaintiff, with the aggravating factor that Defendants took advantage by
- 50 his professional position and have deliberately failed their main duty ;

- 1 8. For actual damages to Plaintiff in an amount according to proof at trial;
- 2 9. For interest thereon at the maximum legally permissible rate;
- 3 10. For all costs of suit incurred herein; and
- 4 11. For such other and further relief as deemed just and proper.

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7 **On the ELEVENTH CAUSE OF ACTION**
8 **11. - DELIBERATE BREACHES OF CONTRACT**

9 **against Scott STOCKER, Andrew WHITMAN, Joey MOCCIA and DOES 1-50**

- 10 1. For an order declaring the offenses committed by each Defendant ;
- 11 2. For an order declaring that Defendants have sold the car or have the obligation to pay it to
- 12 Plaintiff ;
- 13 3. For an order declaring that Defendants have to pay the car the price they put for sale, so
- 14 \$34,990 ;
- 15 4. For punitive damages in an amount of not less than \$10,000 for each of Defendants'
- 16 retaliatory acts ;
- 17 5. For pain and suffering about moral exhaustion, nervous prostration and emotional distress
- 18 caused by Defendant in an amount of not less than \$100,000 ;
- 19 6. For a principal sum of \$1,000,000 ;
- 20 7. For retributory damages in a amount of \$10,000,000, according pain and suffering
- 21 Defendants did on Plaintiff, with the aggravating factor that Defendants took advantage by
- 22 his professional position and have deliberately failed their main duty ;
- 23 8. For actual damages to Plaintiff in an amount according to proof at trial;
- 24 9. For interest thereon at the maximum legally permissible rate;
- 25 10. For all costs of suit incurred herein; and
- 26 11. For such other and further relief as deemed just and proper.

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30 **On the TWELFTH CAUSE OF ACTION**
31 **12. - CORRUPTION, COLLUSION, OBSTRUCTION OF JUSTICE BY OFFICER**
32 **against Nathan VASQUEZ and DOES 1-50**

- 33 1. For an order declaring the offenses committed by Defendant against Plaintiff ;
- 34 2. For an order declaring the personal liabilities of Defendant with either Scott STOCKER,
- 35 Andrew WHITMAN, Joey MOCCIA according the payment of any damages caused by any
- 36 offenses committed against Plaintiff ;
- 37 3. For an order declaring the joint and several financial liability of Defendants with personal
- 38 liabilities of Defendants with either Scott STOCKER, Andrew WHITMAN, Joey MOCCIA
- 39 according the payment of any damages caused by any offenses committed against Plaintiff ;
- 40 4. For an order declaring the joint and several financial liability of Defendants with personal
- 41 liabilities of Defendants with either Scott STOCKER, Andrew WHITMAN, Joey MOCCIA
- 42 according the price they have to pay the car to Plaintiff, so \$34,990 ;
- 43 5. For an order declaring the sureties of Defendants with either Scott STOCKER, Andrew
- 44 WHITMAN, Joey MOCCIA according the payment of any damages caused by any offenses
- 45 committed against Plaintiff ;
- 46 6. For a principal sum of \$1,000,000 ;
- 47 7. For retributory damages in a amount of \$10,000,000, according pain and suffering
- 48 Defendant did on Plaintiff, with the aggravating factor that Defendant is an authority and has
- 49 deliberately failed his main duty ;
- 50 8. For actual damages to Plaintiff in an amount according to proof at trial;

9. For interest thereon at the maximum legally permissible rate;
10. For punitive damages in an amount of not less than \$10,000 for each of Defendants' retaliatory acts ;
11. For pain and suffering about moral exhaustion, nervous prostration and emotional distress caused by Defendant in an amount of not less than \$100.000 ; retaliatory acts;
12. For all costs of suit incurred herein; and
For such other and further relief as deemed just and proper.

On the THIRTEENTH CAUSE OF ACTION
13. - PROFITABLE AND USEFUL PASSIVE COMPLICITY of
CRIMINAL OFFENSES and of CORRUPTION, COLLUSION
and OBSTRUCTION of JUSTICE, LACK OF NEUTRALITY
against Lynn ROBINSON, Don LANE, Patty HAYMOND, Kevin VOGEL and DOES 1-50

1. For an order declaring each offense committed by each Defendant against Plaintiff ;
2. For actual damages to Plaintiff in an amount according to proof at trial;
3. For punitive damages in an amount of not less than \$10.000 for each of Defendants' retaliatory acts;
4. For a principal sum of \$1.000.000 ;
5. For retributory damages in a amount of \$10.000.000, according pain and suffering Defendants did on Plaintiff, with the aggravating factor that Defendants are the highest authorities and have deliberately failed their main duty ;
6. For interest thereon at the maximum legally permissible rate;
7. For an order declaring the professional liabilities of each Defendant with each other ;
8. For an order declaring the personal liabilities of each Defendant with each other ;
9. For an order declaring the joint and several professional financial liability of each Defendant with each other ;
10. For an order declaring the joint and several personal financial liability of each Defendant with each other ;
11. For an order declaring the professional sureties of each Defendant with each other ;
12. For an order declaring the personal sureties of each Defendant with each other ;
13. For an order declaring that each Defendant has to pay jointly and in common Plaintiff, and get personal their refund from each other ;
14. For all costs of suit incurred herein; and
15. For such other and further relief as deemed just and proper.

On all Causes of Action :

1. For attorney's fees according to proof ;
2. For spent personal time and expenses according the status of representing self ;
3. For costs of suit incurred herein ; and
4. For such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Plaintiff, Laurent GRANIER, hereby demands a trial by jury.

The 10th of september 2014.

Laurent GRANIER, Plaintiff, self-represented

