

DEC 10 2014

SUPERIOR COURT OF CALIFORNIA
SAN DIEGO COUNTY

2014 DEC 10 PM 3:12

Case No.: 37-2014-00041691-CU-MC-CTL

Plaintiff(s):

JIM Z. FREEMANN¹
P. O. BOX 121225
SAN DIEGO, CA 92112

weZpeople.com Advocacy Group
P.O. BOX 121225
SAN DIEGO, CA 92112
(Class Action Certification Requested)

v.

Defendant(s):

1. THE CITY OF SAN DIEGO
202 C STREET
SAN DIEGO, CA 92101

**COMPLAINT AND MOTION FOR INJUNCTIVE RELIEF PURSUANT TO F.R.C.P
RULE 65**

COMES NOW, Plaintiff(s) and files this "COMPALINT AND MOTION FOR INJUNCTIVE RELIEF PURSUANT TO F.R.C.P RULE 65". The recipients are requested a timely response and acknowledgement of delivery of this filing upon its receipt and a Motion to the Court to GRANT it upon it being ripe for decision. In support:

VENUE AND JURISDICTION:

1. Venue is proper since Plaintiffs and al defendants work or live in San Diego County.
2. Court has jurisdiction since this being a Tort Law Case that stems from Defendant's acts or lack of pursuant to civil contracts law.

¹DISCLOSURE AND NOTICE: Attended Western State University School of Law in 1988 and moved on to Concord University School of Law. Currently is NOT licensed to practice law in the State of California. Passed the California Bar Lower Level Bar Exam in October 2001. At the present time and since 2004 is under a Colorado Supreme Court Order not to practice law without a license. Has a professional and personal problem with the attorneys' licensing condition that once attorneys are licensed, they become Officers of the Court they practice at. This causes severe CONFLICT OF INTERESTS since Clients' interests becomes secondary because both attorneys and more often than not, the presiding judges are also licensed attorneys which place the individuals' or entities being represented in an extremely disadvantaged conflict of interest that violates the Client-Attorney Representation/ Employment-Engagement Relationship and Clients' Constitutionally Guaranteed Rights.


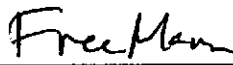
3. On or about September 21, 2014, Plaintiff(s) became members of the Alpha Project – So- aka Neil Good Day Center for the Homeless located at 299 17th Street, San Diego, CA 92101. The Center hours are 6:00 am to 4:00 pm Mon to Fri and 6:00 am to 2:00 pm Sat and Sun.
4. The facility has eight showers for the use by the Homeless. Upon information and belief, the showers have been out of order since July 2014. According to the individuals who are at the facility, it is the responsibility of the City of San Diego to remodel the Showers and the Bathrooms at the facility as part of the Contract between the Alpha Project and the City.
5. Upon information and belief, the City of San Diego Health Inspection Department who ordered the closure of the Showers because they were not up to the current health and safety code, or whatever the inspectors decided. Plaintiffs are not at liberty to verify or review the reason given nor to have a copy between the Alpha project and the City.
6. Regardless of who is doing what between the City Real Estate and Assets Department and the Health Code Enforcement, Plaintiffs are not being able to take showers as needed. Alpha Project has a temporary temperamental arrangement with St. Vincent De Paul Village ("SVDPV") to use their showers at some odd hours. It is quite impossible often to meet the hours and conditions dictated by the unprofessional management at SVDPV.
7. Further, Plaintiffs have a lawsuit pending against SVDPV wherein Plaintiffs' complaint states at the outset that "Defendants Father Joe and his personnel are running an **Organized Crime Operation** known as St. Vincent De Paul Village". Therefore, it is not wise for the Plaintiffs to use the SVDPV showers. Case Name: FreeMann and weZpeople.com Advocacy Group v. St Vincent De Paul Village. Case #: 37-2014-00039232-CU-MC-CTL. Further Plaintiff has a restraining Order against a number of its Staff including one of its unprofessional Managers Earlene Adams and its unqualified Security Chief Major (*Minor*) Jesus Gonzales, case # 37-2014-41206.
8. Therefore, it is warranted that the City of San Diego meets its obligations of remodeling the Showers and opening them up for the use by the Alpha Projects Members. On the alternative, to make the necessary funds available and placed in escrow under the sole control of Alpha Projects to hire and pay the necessary contractors. Plaintiffs move the Honorable Court to order the City of San Diego to deposit into the account at least 50% more than the highest estimate that is available or will be available prior to the beginning of the construction work. Architectural and detailed designs to be paid for separately if needed. The Contractor chosen for the project is to be the sole choice of Alpha Project and the basis for choosing the Contractor should not be based on the lowest bidder but also on the earliest reasonable completion of the project.
9. Further, Plaintiffs move the Court for monetary punitive sanctions against the City of San Diego in the amount no less than three times the completion cost or whatever reasonable sum the Honorable Court may deem suitable. These funds are to be

distributed amongst the Alpha Projects members; Alpha Project itself and Plaintiff **weZpeople.com Advocacy Group ("weZpeople")**. The Sanctions amount is to be divided into thirds. One third to be distributed between the members for the suffering and inconvenience; one third to Alpha Project to recover its supervision of the construction and the other personnel and security personnel costs; and the last third to weZpeople.com Advocacy Group for bearing the burden of initiating this lawsuit and time costs of taking it from inception into its ultimate finality..

WHEREFORE, Plaintiffs move the Court to Grant Judgment to each and every item of this complaint at the Court's earliest convenience.

THE CLAIMS FOR RELIEF MAY EXCEED \$100,000.

Respectfully submitted to the court on this 18th Day of November, 2014

 _____ JIM Z. FREEMANN P.O. BOX 121225 SAN DIEGO, CA 92112	 _____ weZpeople.com Group P.O. BOX 121225 SAN DIEGO, CA 92112 By Jim Z. Freemann Interim President and Chief Executive Officer ("CEO")
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NOTES:

(1) Based on *Haines v. Kerner*, 404, U.S. 519, 520-521 (1972) and *Hall v. Bellmon*, 935 F. 2d 1106, 1110 (10th Cir.1991), filings must be construed liberally towards the pro se party. (2) A pro se pleading, motion or filing is deemed filed upon delivery to prison authorities. See *Houston v. Lack*, 487 U. S. 266 (1988). (3) Due process guarantees of fundamental fairness derives from belief that justice can not be equal simply as a result of defendant social status. See *Doan v. INS*, 311 F. 3d 1169-1182 (9th Cir. 2002). (4) Officials can not ignore a problem once it is brought to their attention and prisoners can not be deprived of life necessity like food and other amenities. See *Foster v. Punnels*, 554 F.3d. 807 (9th Cir.).

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V.

Defendant(s):

1. CITY OF SAN DIEGO
202 C STREET
SAN DIEGO, CA 92101

SUPPLEMENT TO COMPLAINT

COMES NOW, Plaintiff(s) and files this "SUPPLEMENT TO COMPLAINT". The recipients are requested a timely response and acknowledgement of delivery of this filing upon its receipt and a Motion to the Court to GRANT it upon it being ripe for decision. In support:



1. Plaintiff adds the following Defendants:
 1. Central Library
 2. Gary Klockmanga
 3. Jennefer Geran
 4. Lance Doe

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5. Janet Doe
6. Jesus Beranavidas
7. John Regan

WHEREFORE, Plaintiffs move the Court to Grant Judgment to each and every item of this complaint at the Court's earliest convenience.

Respectfully submitted to the court on this 30^h Day of November, 2014

 _____ JIM Z. FREEMANN P.O. BOX 121225 SAN DIEGO, CA 92112	 _____ weZpeople.com Group P.O. BOX 121225 SAN DIEGO, CA 92112 By Jim Z. Freemann Interim President and Chief Executive Officer ("CEO")
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(1) Based on *Haines v. Kerner*, 404, U.S. 519, 520-521 (1972) and *Hall v. Bellmon*, 935 F. 2d 1106, 1110 (10th Cir. 1991), filings must be construed liberally towards the pro se party. (2) A pro se pleading, motion or filing is deemed filed upon delivery to prison authorities. See *Houston v. Lack*, 487 U. S. 266 (1988). (3) Due process guarantees of fundamental fairness derives from belief that justice can not be equal simply as a result of defendant social status. See *Doan v. INS*, 311 F. 3d 1169-1162 (9th Cir. 2002). (4) Officials can not ignore a problem once it is brought to their attention and prisoners can not be deprived of life necessity like food and other amenities. See *Foster v. Punnels*, 554 F.3d. 807 (9th Cir.).