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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
14 **IN AND FOR THE COUNTY OF ALAMEDA**

15 **THE PEOPLE OF THE STATE OF**  
16 **CALIFORNIA, *ex rel.* CAROL**  
17 **SPOONER, JOHN D. BIELLO,**  
18 **CAROLYN M. BIRDEN, KURT**  
19 **GUERDRUM, ARTURO GRIFFITHS,**  
20 **AMBURN R. HAGUE, LEIGH**  
21 **HAUTER, PATRICIA HEFFLEY,**  
22 **BARBARA MacQUIDDY, RICK**  
23 **POTHOFF, CHARLES P. H.**  
24 **SCURICH, RONALD SWART, indivi-**  
25 **dually and on behalf of PACIFICA**  
26 **FOUNDATION,**

27 **Plaintiffs,**

28 **vs.**

1 **PACIFICA FOUNDATION, a California**  
2 **non-profit public benefit corporation**  
3 **and charitable trust, MARY FRANCES**  
4 **BERRY, JUNE MAKELA, WILLIAM**  
5 **LUCY, FRANK MILLSAUGH,**  
6 **ANDREA CISCO, KEN FORD, ROB**  
7 **ROBINSON, DAVID ACOSTA,**  
8 **MICHAEL PALMER, ROBERT FAR-**  
9 **RELL, AARON KRIEGEL, PETER**  
10 **BRAMSON, KAROLYN VAN PUT-**  
11 **TEN, TOMAS MORAN, WENDELL**  
12 **JOHNS, and DOES 1-100, inclusive,**

13 **Defendants.**

Case No.

**VERIFIED COMPLAINT**  
***IN QUO WARRANTO***

[Code Civ. Proc. § 803; Corp. C. §§  
5142, 5151(a), 5223, 5250, 5520,  
6320(a)(1), 6336, 9505; Govt. C. §§  
12580, 12591, 12596, 12598; 11 Bar-  
clay's Official Cal. Code Regs. §§ 1-11]

1. **Declaratory Relief Compelling Adoption and Implementation of Fair, Reasonable, and Consistent Mechanisms for Defining and Democratically Selecting Voting Members, and for Voting Members to Democratically Nominate and Elect Directors**
2. **Usurpation of Office**
3. **Breach of Charitable Trust**
4. **Gross Abuse of Authority and Discretion**
5. **Accounting**

