

1 ROB BONTA
Attorney General of California
2 TANIA M. IBANEZ
Senior Assistant Attorney General
3 JOSEPH N. ZIMRING
Supervising Deputy Attorney General
4 JAMI L. CANTORE
JOHN C. TRANG
5 Deputy Attorneys General
State Bar No. 277080
6 300 South Spring Street, Suite 1702
Los Angeles, CA 90013
7 Telephone: (213) 269-6564
E-mail: John.Trang@doj.ca.gov
8 *Attorneys for the People of the State of California*

**Exempt from Filing and Reporter
Fees -- Gov. Code § 6103**

9
10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 RIVERSIDE COUNTY

12
13 **THE PEOPLE OF THE STATE OF CALIFORNIA,**

Case No. **CVRI 2205326**

14 **PLAINTIFF**

**COMPLAINT FOR DAMAGES, CIVIL
PENALTIES AND FOR OTHER
EQUITABLE RELIEF ARISING FROM:**

15
16 **v.**

(1) INVOLUNTARY DISSOLUTION

17 **CALIFORNIA EQUINE RETIREMENT
18 FOUNDATION, A CALIFORNIA NON-PROFIT
PUBLIC BENEFIT CORPORATION; CARRIE
19 ARD; AND DOES 1 – 20,**

(2) BREACH OF CHARITABLE TRUST

(3) BREACH OF FIDUCIARY DUTY

20 **DEFENDANTS**

**(4) UNJUST ENRICHMENT /
WRONGFUL ACQUISITION OF
PROPERTY (CIV. CODE SECTION
2224)**

(5) UNLAWFUL SOLICITATION

21
22
23
24 Plaintiff, the People of the State of California, files this complaint against California Equine
25 Retirement Foundation, Carrie Ard, and DOES 1-20 (collectively “DEFENDANTS”) and alleges
26 as follows:

27 1. The Attorney General of California, Rob Bonta, (“Attorney General”) who brings this
28 action on behalf of the People, is charged with the general supervision of nonprofit public benefit

1 corporations and all organizations and individuals who obtain, hold, or control property in trust
2 for charitable or eleemosynary purposes in California. The Attorney General has the primary
3 responsibility for supervising charitable trusts, “for ensuring compliance with trusts and articles
4 of incorporation, and for protecting assets held by charitable trusts and public benefit
5 corporations.” (Gov. Code, § 12598.) The Attorney General is authorized to enforce the
6 provisions of the Supervision of Trustees and Fundraisers for Charitable Purposes Act
7 (“Supervision Act”) (Gov. Code, § 12580 et seq.), the Nonprofit Corporation Law (Corp. Code, §
8 5000 et seq.), and the Solicitations for Charitable Purposes Law (Bus. & Prof. Code § 17510 et
9 seq.).

10 DEFENDANTS

11 2. Defendant California Equine Retirement Foundation (“CERF”) has its principal place
12 of business in San Jacinto, Riverside County, California. CERF is a defunct nonprofit public
13 benefit corporation. CERF incorporated in 1986 for the purpose of providing assistance to retired
14 equine livestock. Pursuant to its Articles of Incorporation:

15 The specific and primary purpose for which this non-profit corporation is formed is to
16 offer and provide charitable assistance to retired equine livestock, in the form of
17 providing pasture, feed, veterinary care, housing and other essential needs to horses
18 which have, in the past, demonstrated or exhibited a public interest, and have since
retired from their active endeavor. It is the intention of this corporation to provide
such facilities for these animals so that the general public may have an opportunity to
visit and view these animals in their retirement.

19 3. CERF registered with the Attorney General’s Registry of Charitable Trusts
20 (“Registry”) and was issued California charity registration number CT 066089. CERF’s charity
21 registration was revoked on or about February 8, 2017. CERF’s tax-exempt status was revoked
22 by the IRS effective May 15, 2017. CERF’s corporate status was suspended by the Franchise Tax
23 Board on or about April 2, 2019.

24 4. CERF holds its assets in trust on behalf of its charitable beneficiaries. CERF’s
25 property is irrevocably dedicated to charitable purposes and no part of its net income or assets
26 may inure to the benefit of any director, officer, member or private person. (Rev. & Tax Code, §
27 23701d.) The dedication of assets requires that in the event of dissolution or the impossibility of
28 performing the charity’s organizational purposes, the assets continue to be devoted to exempt

1 purposes. (*Id.*) CERF’s Articles of Incorporation provide: “Upon the dissolution or winding up
2 of the corporation, its assets... shall be distributed to a non-profit fund, foundation or corporation
3 which is organized and operated exclusively for charitable purposes and which has established its
4 tax exempt status under Section 501(c)(3) of the Internal Revenue Code.”

5 5. A corporation cannot legally operate in California when its corporate status is
6 suspended. (See, e.g., Rev. & Tax. Code, § 23302.) It cannot sell, transfer, or exchange real
7 property in California. (Rev. & Tax. Code, § 23302, subd. (d).) It is a crime for any person to
8 attempt or purport to exercise the powers, rights, and privileges of a corporation that has been
9 suspended. (Rev. & Tax. Code, § 19719.) The corporation was required to notify the Attorney
10 General of the suspension of its corporate status within 30 days, but failed to do so. (Cal. Code
11 Regs., tit. 11, § 999.9.2, subd. (b).) It is impossible for CERF to perform its charitable
12 organizational purpose.

13 6. A charity, or any person soliciting on behalf of a charity, has a fiduciary relationship
14 with any person from whom a charitable contribution is being solicited. (Bus. & Prof. Code, §
15 17510.8.) The acceptance of a charitable contribution by a charity, or any person soliciting on
16 behalf of a charity, establishes a charitable trust and a duty to use the charitable contribution for
17 the declared charitable purposes for which it was sought. On information and belief, in 2016
18 CERF used charitable assets to purchase 29.79 acres of real property located at 805 N. Sanderson
19 Ave., San Jacinto, CA 92582 (“Property”).

20 7. Defendant Carrie Ard (“ARD”) is a resident of San Jacinto in Riverside County,
21 California. At all times relevant, ARD is and was the Chief Executive Officer of CERF and owed
22 fiduciary duties of care and loyalty to CERF and its charitable beneficiaries.

23 8. On information and belief, at all times relevant, ARD has resided and continues to
24 reside on the CERF Property without paying rent or providing other valuable consideration to
25 CERF. On further information and belief, from at least February 2017, ARD has improperly and
26 continuously used the CERF Property for purposes unrelated to operating the charity.

27 9. In or about January 2022, ARD and DOES 1-20 improperly attempted to sell the
28 CERF Property for a list price of \$2,729,000. As a suspended corporation, CERF cannot operate

1 or conduct business, including the sale, transfer, or exchange of real property in California. (Rev.
2 & Tax. Code, § 23302.) A charity with a revoked registration is not in good standing with the
3 Registry and cannot operate in California. (Cal. Code Regs., tit. 11, § 999.9.4.) A revoked
4 registrant may not distribute or expend any charitable assets or assets subject to a charitable trust
5 without the written approval of the Attorney General. (Cal. Code Regs., tit. 11, § 999.9.3.) The
6 CERF Property is a charitable asset that is irrevocably dedicated to charitable purposes.
7 Therefore, it was illegal for ARD, CERF, and DOES 1-20, to attempt to sell or transfer the
8 Property.

9 10. On January 19, 2022, the Registry issued an Order to Cease and Desist against CERF
10 and ARD pursuant to Government Code section 12591.1, subdivision (b). The Order prohibits
11 the transfer, sale, disbursement, conveyance, or encumbrance of any charitable assets without
12 written approval by the Attorney General. The Order applies to ARD, CERF, and its founders,
13 officers, directors, employees, agents, trustees, and all persons or entities acting on their behalf.
14 Neither CERF nor ARD appealed the Order or requested a hearing and the Order is final. (Gov.
15 Code, § 12591.1, subd. (e); Cal. Code Regs., tit. 11, § 999.6, subd. (c).)

16 11. DOES 1-20, inclusive, are the fictitious names of DEFENDANTS who have acted as
17 directors, officers, trustees, agents or employees of DEFENDANTS, or who have participated or
18 acted in concert with one or more DEFENDANTS, or who have acted on behalf or as an agent,
19 servant, employee or co-conspirator of one or more of the DEFENDANTS, but whose name and
20 capacities, whether individual, corporate or otherwise, are presently unknown to Plaintiff.
21 Plaintiff is informed and believes that DEFENDANTS DOES 1-20 have directly or indirectly
22 participated in and are responsible for the acts and omissions that are more specifically described
23 in this Complaint. Because Plaintiff is presently uninformed as to the true names and capacities
24 of these DEFENDANTS, Plaintiff sues them by their fictitious names but will seek leave to
25 amend the Complaint when their true names are discovered.

26 **JURISDICTION AND VENUE**

27 12. At all times relevant, DEFENDANTS and each of them transacted business in the
28 County of Riverside and elsewhere in the State of California. The violations of law hereinafter

1 described have been and are now being carried out, in part, within said county and throughout the
2 State of California. This Court has jurisdiction pursuant to Article VI, section 10 of the
3 California Constitution and section 393 of the Code of Civil Procedure.

4 **GENERAL ALLEGATIONS**

5 13. Whenever reference is made in this Complaint to any act of any corporate or other
6 business defendant, such allegation shall mean that said defendant and its owners, officers,
7 directors, agents, employees, or representatives did or authorized such acts while engaged in the
8 management, direction, or control of the affairs of DEFENDANTS and while acting within the
9 scope and course of their duties.

10 14. Whenever reference is made in this Complaint to any act of DEFENDANTS, such
11 allegation shall mean that each defendant acted individually and jointly with the other
12 DEFENDANTS named in that cause of action.

13 15. Whenever reference is made in this Complaint to any act of any individual defendant,
14 such allegation shall be deemed to mean that said defendant is and was acting (a) as a principal,
15 (b) under express or implied agency, and/or (c) with actual or ostensible authority to perform the
16 acts so alleged on behalf of every other defendant.

17 **FIRST CAUSE OF ACTION**

18 **INVOLUNTARY DISSOLUTION**

19 **(AGAINST CERF)**

20 16. Plaintiff re-alleges and incorporates by reference as though fully set forth herein each
21 of the allegations of paragraphs 1 through 15 of this Complaint.

22 17. The Attorney General is authorized to file a complaint for involuntary dissolution of a
23 nonprofit public benefit corporation pursuant to Corporations Code section 6510, subdivision
24 (a)(5) and section 6511, subdivision (a).

25 18. CERF is subject to involuntary dissolution pursuant to Corporations Code section
26 6510, subdivision (b)(1), on the grounds that the corporation has abandoned its activity as a
27 charitable corporation for more than one year as follows: (1) on or about May 15, 2017, CERF's
28 tax-exempt status under Internal Revenue Code section 501(c)(3) was revoked; (2) CERF's

1 registration with the Attorney General’s Registry of Charitable Trusts has been revoked since
2 February 8, 2017; and (3) CERF’s corporate status is suspended by the Franchise Tax Board.

3 19. A charity that is subject to the registration requirements of Government Code section
4 12580 et seq., must be registered and in good standing with the Registry of Charitable Trusts to
5 operate or solicit for charitable purposes. A registration that is revoked is not in good standing
6 and is prohibited from engaging in conduct for which registration is required. (Cal. Code Regs.,
7 tit. 11, §999.9.4.) CERF is a charity that is subject to the registration requirements, but failed to
8 register and remain in good standing with the Registry of Charitable Trusts. CERF has been
9 prohibited from operating as a charity since at least February 8 2017, the date of registration
10 revocation. CERF abandoned its activity as a charitable corporation for more than one year and is
11 subject to involuntary dissolution.

12 20. CERF is also subject to involuntary dissolution pursuant to Corporations Code
13 section 6510, subdivision (b)(5), in that ARD and DOES 1-20 have knowingly and persistently
14 mismanaged CERF resulting in the revocation of CERF’s IRS tax-exempt status and California
15 registration status, as well as suspension by the Franchise Tax Board.

16 21. From approximately July 2015 to December 2019, CERF, ARD, and DOES 1-20,
17 knowingly and persistently mismanaged CERF by failing to comply with the Registry’s annual
18 registration and reporting requirements. On or about July 20, 2015, the Registry issued a Notice
19 of Intent to Suspend or Revoke Registration pursuant to Government Code section 12598,
20 subdivision (e)(1). CERF, ARD, and DOES 1-20 failed to respond in any manner to the notice,
21 resulting in the suspension of CERF’s charity registration as of September 14, 2015.
22 DEFENDANTS had one year to cure the violations. After being suspended continuously for
23 more than one year, the Registry issued a Final Notice of Revocation on October 7, 2016. CERF,
24 ARD, and DOES 1-20 failed to respond, which resulted in the revocation of CERF’s charity
25 registration as of February 8, 2017.

26 22. CERF, ARD and DOES 1-20 failed to provide an accounting of all charitable assets
27 within their control for the 180 days prior to the effective date of the order as required by
28 California Code of Regulations, title 11, section 999.9.3. CERF, ARD, and DOES 1-20 also have

1 a duty to account to the Attorney General for all funds and assets of CERF pursuant to
2 Corporations Code section 5250. CERF's property is impressed with a charitable trust to be used
3 solely for charitable purposes, and DEFENDANTS are constructive trustees of all such funds and
4 assets in their possession custody, or control.

5 23. The Attorney General issued written requests for documents and information to
6 CERF on or about July 24, 2019 and December 4, 2019. CERF, ARD, and DOES 1-20 failed to
7 respond in any manner to the Attorney General's written requests in violation of California Code
8 of Regulations, title 11, section 314.

9 24. On information and belief, ARD has at all times relevant resided on CERF's Property
10 without paying rent or providing other valuable consideration to CERF.

11 25. From 2018 to present, CERF, ARD and DOES 1-20 caused liens of over \$213,000 to
12 be recorded against the CERF Property by tax agencies, the water district, the Labor
13 Commissioner, and the State Employment Development Department.

14 26. On January 19, 2022, the Registry issued an Order to Cease and Desist against CERF
15 and ARD after CERF, ARD, and DOES 1-20 illegally attempted to sell CERF's Property, a
16 charitable asset, for a list price of \$2,729,000. The attempted property sale by ARD and DOES 1-
17 20, continued use of the CERF Property for purposes unrelated to the operation of the charity,
18 continued residence by ARD on the CERF Property, and conduct resulting in over \$213,000 in
19 liens against the CERF Property are knowing, persistent, and pervasive abuses of the
20 corporation's property causing the CERF Property to be misapplied and wasted by ARD and
21 DOES 1-20 in violation of Corporations Code section 6510, subdivision (b)(5).

22 27. CERF, ARD, and DOES 1-20 knowingly and persistently mismanaged CERF to the
23 point that CERF can no longer operate or perform the charity's organizational purposes.

24 28. CERF is also subject to involuntary dissolution pursuant to Corporations Code
25 section 6510, subdivision (b)(6), on the grounds that liquidation is reasonably necessary as CERF
26 is failing and has continuously failed to carry out its purposes.

27 29. CERF cannot carry out its charitable purposes. The corporation should be dissolved
28 and all of its assets transferred to an organization with a similar charitable purpose as required by

1 CERF's articles of incorporation. Because CERF has been subject to persistent abuse and
2 mismanagement, the court should issue a permanent ban against ARD and DOES 1-20 from
3 operating any charitable corporation or charitable trust in California.

4 **SECOND CAUSE OF ACTION**
5 **BREACH OF CHARITABLE TRUST**
6 **(AGAINST ALL DEFENDANTS)**

7 30. Plaintiff re-alleges and incorporates by reference as though fully set forth herein each
8 of the allegations of paragraphs 1 through 29 of this Complaint.

9 31. As a public benefit corporation, CERF holds all of its funds and other assets in trust
10 for charitable purposes. (Gov. Code, §§ 12582, 12582.1; Bus. & Prof. Code, § 17510.8.)
11 CERF's property is irrevocably dedicated to charitable purposes and no part of the net income or
12 assets may inure to the benefit of any director, officer, member or private person. (Rev. & Tax
13 Code, § 23701d.) Pursuant to Corporations Code section 5142, the Attorney General may bring
14 an action to enjoin, correct, obtain damages for or to otherwise remedy a breach of a charitable
15 trust.

16 32. CERF accepted charitable contributions for specific charitable purposes, including
17 those stated in its articles of incorporation. Once CERF accepted donations, a charitable trust was
18 impressed on those funds and DEFENDANTS had a fiduciary duty to ensure that the donations
19 were used for the purposes stated in its Articles and Bylaws and for the declared charitable
20 purposes for which they were solicited. (Bus. & Prof. Code, § 17510.8.)

21 33. CERF, ARD and DOES 1-20 committed a breach of charitable trust by failing to
22 ensure that the donations were properly used for the declared purposes for which they were
23 solicited. Persistent mismanagement and abuse of authority by ARD and DOES 1-20 resulted in
24 the revocation of both CERF's IRS tax-exempt 501(c)(3) status and California charity
25 registration. As a suspended corporation/revoked charity it is impossible for CERF to perform its
26 exempt organizational purposes. On information and belief, ARD has improperly and
27 continuously used the CERF property for her own benefit. On further information and belief,
28 ARD, without paying fair market consideration, has continuously resided in a single family

1 residence on the CERF Property. The use of CERF's property as a residence for the sole benefit
2 of ARD is a breach of charitable trust in that the property is a charitable asset that may only be
3 used for charitable purposes, and may not inure to the benefit of any private individual. (Bus. &
4 Prof. Code, § 17510.8, Rev. & Tax Code, § 23701d.)

5 34. DEFENDANTS committed breaches of charitable trust by using CERF's donations
6 for purposes other than those for which they were donated or obtained. The Attorney General has
7 authority to remedy any breach of charitable trust against CERF, ARD, and DOES 1-20, pursuant
8 to Corporations Code section 5142, subdivision (a)(5), section 5250, and Government Code
9 section 12598.

10 **THIRD CAUSE OF ACTION**
11 **BREACH OF FIDUCIARY DUTY**
12 **(AGAINST ARD AND DOES 1-20)**

13 35. Plaintiff re-alleges and incorporates by reference as though fully set forth herein each
14 of the allegations of Paragraphs 1 through 34 of this Complaint.

15 36. CERF, ARD, and DOES 1-20 have a fiduciary relationship with the donors and
16 beneficiaries of CERF and owe fiduciary duties of loyalty, care, and good faith in their dealings
17 with CERF, as well as an obligation to ensure that CERF complies with all applicable laws as
18 required under the Supervision Act (Gov. Code section 12580 et seq.) and the Corporations Code.
19 DEFENDANTS accepted donations on behalf of CERF. The acceptance of those donations
20 established a charitable trust and fiduciary duty on the part of DEFENDANTS to ensure that the
21 donations were used for the declared charitable purposes for which they were donated and sought
22 and as identified in CERF's founding documents. ARD and DOES 1-20 breached their duties of
23 care and loyalty to CERF by engaging in, participating in, aiding and abetting, and facilitating
24 unlawful actions, or omissions, including, but not limited to, the following acts and/or omissions
25 in violation of Corporations Code section 5231:

- 26 (a) Failing to comply with the registration and reporting requirements set forth in the
27 Supervision Act (Gov. Code, § 12580 et. seq.), thereby causing the revocation of
28

1 CERF's California charity registration and its IRS 501(c)(3) tax-exempt status, as well
2 as causing CERF to be in suspended status with the Franchise Tax Board.

3 (b) Illegally attempting to sell the CERF Property, a charitable asset. A suspended
4 corporation cannot sell, transfer, or exchange real property in California. (Rev. & Tax.
5 Code, § 23302, subd. (d).) A revoked registrant may not distribute or expend any
6 charitable assets or assets subject to a charitable trust without the written approval of
7 the Attorney General. (Cal. Code Regs., tit. 11, § 999.9.3.) The CERF Property is a
8 charitable asset that is irrevocably dedicated to charitable purposes.

9 (c) Engaging in improper self-dealing transactions in violation of Corporations Code
10 section 5233 in that ARD at all times relevant has and continues to reside on CERF's
11 property without paying CERF rent or other valuable consideration.

12 (d) Causing liens of over \$213,000 to be recorded against the CERF Property by tax
13 agencies, the water district, the Labor Commissioner, and the State Employment
14 Development Department.

15 37. At all times relevant, DEFENDANTS failed to act in good faith, failed to act in
16 CERF's best interests, and failed to use due care as required under Corporations Code section
17 5231. To preserve and conserve CERF's assets and to prevent waste, dissipation and loss of
18 charitable assets, the court should permanently remove and enjoin ARD from acting in any
19 capacity for CERF and from operating any charitable corporation or charitable trust in California.

20 38. The acts as alleged in this cause of action were willful, wanton, malicious and
21 oppressive and were undertaken with the intent to defraud CERF, its charitable beneficiaries and
22 donors and thus justify the awarding of exemplary and punitive damages against DEFENDANTS.

23 **FOURTH CAUSE OF ACTION**

24 **UNJUST ENRICHMENT / WRONGFUL ACQUISITION OF PROPERTY**

25 **[CIVIL CODE SECTION 2224]**

26 **(AGAINST ARD AND DOES 1-20)**

27 39. Plaintiff re-alleges and incorporates by reference as though fully set forth herein each
28 of the allegations of paragraphs 1 through 38 of this Complaint.

1 Taxation Code. Nonetheless, from at least July 2018 to April 2019, ARD and DOES 1-20 falsely
2 represented to donors that donations to CERF were fully tax deductible because CERF was a
3 501(c)(3) nonprofit organization. On information and belief, ARD and DOES 1-20 solicited
4 thousands of dollars from donors during that time based on false representations that CERF was a
5 501(c)(3) nonprofit organization.

6 45. CERF, ARD, and DOES 1-20 violated the Supervision Act (Gov. Code, § 12580, et
7 seq.) and its implementing regulations by unlawfully soliciting donations while CERF was not in
8 good standing and in revoked status with the Registry and the IRS.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, the People of the State of California seek relief as follows:

11 1. For a permanent injunction, enjoining DEFENDANTS, their employees, agents,
12 representatives, successors, and assigns, any and all persons acting in concert or participation
13 with them, and all other persons, corporations, or other entities acting under, by, through, or on
14 their behalf, from doing any of the following: (1) expending, disbursing, transferring,
15 encumbering, withdrawing or otherwise exercising control over any funds received by or on
16 behalf of CERF or rightfully due the CERF except as authorized by the Court; (2) conducting
17 business of any kind on behalf of, or relating to CERF other than as necessary to assist a Receiver
18 or appointed director(s), to comply with discovery requests and orders, and as permitted by the
19 Court; and (3) controlling or directing the operations and affairs of any California nonprofit
20 public benefit corporation;

21 2. That an order issue directing that DEFENDANTS and each of them, render to the
22 Court and to the Attorney General a full and complete accounting of the financial activities and
23 condition of CERF from 2012 to the present, to include the expenditure and disposition of all
24 revenues and assets received by or on behalf of CERF. Upon the rendering of such accounting,
25 that the Court determine the property, real or personal, or the proceeds thereof, to which CERF
26 and the charitable beneficiaries thereof are lawfully entitled, in whatsoever form in whosoever
27 hands they may now be, and order and declare that all such property or the proceeds thereof is
28 impressed with a trust for charitable purposes, that DEFENDANTS are constructive trustees of all

1 such charitable funds and assets in their possession, custody or control, and that the same shall be
2 deposited forthwith in Court by each and every defendant now holding or possessing the same or
3 claiming any rights, title or interest therein. In addition, that these DEFENDANTS be surcharged
4 and held liable and judgment entered against each of them for any and all such assets for which
5 they fail to properly account, together with interest thereon at the legal rate from the date of
6 liability thereon; and that any and all expenses and fees incurred by DEFENDANTS in this action
7 be borne by the individual DEFENDANTS and each of them and not by CERF or any other
8 public or charitable corporation or fund;

9 3. For damages against DEFENDANTS in an amount to be determined following an
10 accounting from these DEFENDANTS, plus interest at the legal rate until the judgment is paid;

11 4. For punitive and exemplary damages against DEFENDANTS according to proof;

12 5. That the Court assess civil penalties against DEFENDANTS pursuant to Government
13 Code section 12591.1 for violations of the Supervision of Trustees and Fundraisers for Charitable
14 Purposes Act (Gov. Code § 12580 et seq.) as proved at trial;

15 6. That the Court order the involuntary dissolution of CERF pursuant to the provisions
16 of Corporations Code section 6518, provide for satisfaction of all of its lawful debts, and establish
17 a procedure for determining the disposition of all remaining assets of CERF in a manner
18 consistent with their charitable purposes and consistent with any lawful restrictions that have been
19 placed upon any of their remaining assets;

20 7. That the Court order the permanent removal of ARD from the CERF's board pursuant
21 to the provisions of Corporations Code section 5223;

22 8. Attorneys' fees and actual costs incurred in this charitable trust enforcement action
23 under Government Code section 12598 subdivision (b), to be used for the Attorney General's
24 charitable trust enforcement responsibilities under Government Code, section 12586.2; and

25 9. For such other relief as the Court may deem just and proper.
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THIS COMPLAINT IS DEEMED VERIFIED UNDER THE PROVISIONS OF CODE OF
CIVIL PROCEDURE SECTION 446.

Dated: December 5, 2022

Respectfully Submitted,
ROB BONTA
Attorney General of California
JOSEPH N. ZIMRING
Supervising Deputy Attorney General



JAMI L. CANTORE
JOHN C. TRANG
Deputy Attorneys General
*Attorneys for the People of the State of
California*