

**SUBMITTAL TO THE BOARD OF SUPERVISORS  
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**

192



**FROM:** Stanley L. Sniff Jr., Sheriff-Coroner-PA

**SUBMITTAL DATE:**  
09/03/09

**SUBJECT:** Report on the Enforcement of Ordinance 884-Targeted Residential Picketing

**RECOMMENDED MOTION:** Move that the Board of Supervisors receive and file this report on the Sheriff's enforcement of Ordinance 884, which regulates targeted picketing of residences.

**BACKGROUND:** On March 3, 2009 (3.6), the Board of Supervisors adopted County Ordinance 884 to regulate picketing targeted at a specific residential dwelling. In addition, the Board requested the Sheriff's Department track the effectiveness and ease of enforcement of the new ordinance for six months and return to the Board with a report of its findings.

Since the enactment of the Ordinance, there have not been any situations where the Ordinance has been utilized. In situations where picketing has occurred, the Sheriff's Department has found the usage of existing penal code violations more appropriate.

Per a request of County Counsel, we are also including an August 31, 2009 memo sent to Supervisor Buster in response to his questions on the necessity for the Ordinance.

(Continued on Page 2)

Departmental Concurrence

*Will Taylor* for  
 \_\_\_\_\_  
 Stanley L. Sniff Jr., Sheriff-Coroner-PA  
 Will Taylor, Director of Administration

<b>FINANCIAL DATA</b>	Current F.Y. Total Cost:	NA	In Current Year Budget:	NA
	Current F.Y. Net County Cost:	NA	Budget Adjustment:	NA
	Annual Net County Cost:	NA	For Fiscal Year:	FY 2009-10

<b>SOURCE OF FUNDS:</b> BR 10-032	Positions To Be Deleted Per A-30	<input type="checkbox"/>
	Requires 4/5 Vote	<input type="checkbox"/>

**C.E.O. RECOMMENDATION:** APPROVE  
 BY: *Robert Tremaine*  
 Robert Tremaine  
 \_\_\_\_\_  
 County Executive Office Signature

Dept't Recomm.:  Consent  Policy  
 Per Exec. Ofc.:  Consent  Policy

APPROVED 09/03/09  
 COUNTY OF RIVERSIDE

3.42

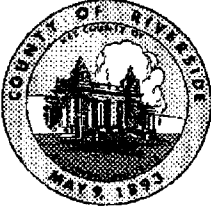
County Counsel wrote:

“During the hearing on the targeted residential picketing ordinance (Ordinance No. 884), Supervisor Buster inquired whether restrictions on targeted residential picketing could be enforced, without an ordinance, in the same manner as addressed by the UC Regents in the Regents of the University of California v. UCLA Primate Freedom (Los Angeles Superior Court No. SC097145) case. The UC Regents filed an action to prohibit the harassment and terrorizing of their employees and students engaged in animal research, and the trespass and vandalism to their homes and personal property. The animal rights groups did not submit an opposition to the preliminary injunction and the injunction was granted.

While trespass and vandalism to real and personal property can be enforced through existing Penal Code sections, some of the causes of action asserted in the UC Regents complaint (harassment, intentional infliction of emotional distress, violation of right to privacy/intrusion into private affairs and intentional interference with business relations) would need to be enforced by the person/property owner subject to the harassment or their employer. The County would be unable to assert these causes of action on their behalf, but the Sheriff could enforce a "stay away" court order once obtained by the plaintiffs.”

The memo and complaint are included as attachments.

# MEMORANDUM



RIVERSIDE COUNTY COUNSEL

**CONFIDENTIAL**  
**ATTORNEY-CLIENT PRIVILEGE**

DATE: August 31, 2009

TO: Supervisor Bob Buster, District 1

FROM: Pamela J. Walls *PJW*  
County Counsel

RE: *Regents of the University of California v. UCLA Primate Freedom*  
Los Angeles Superior Court Case No. SC097145

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During the hearing on the targeted residential picketing ordinance (Ordinance No. 884), you inquired whether restrictions on targeted residential picketing could be enforced, without an ordinance, in the same manner as addressed by the UC Regents in the above-entitled case. The UC Regents filed an action to prohibit the harassment and terrorizing of their employees and students engaged in animal research, and the trespass and vandalism to their homes and personal property. The animal rights groups did not submit an opposition to the preliminary injunction and the injunction was granted.

While trespass and vandalism to real and personal property can be enforced through existing Penal Code sections, some of the causes of action asserted in the UC Regents complaint (harassment, intentional infliction of emotional distress, violation of right to privacy/intrusion into private affairs and intentional interference with business relations) would need to be enforced by the person/property owner subject to the harassment or their employer. The County would be unable to assert these causes of action on their behalf, but the Sheriff could enforce a "stay away" court order once obtained by the plaintiffs.

A copy of the complaint and the court's ruling in the above-entitled case are attached for your review.

PJW:ay  
Attachments

cc: Supervisor John Tavaglione, District 2  
Supervisor Jeff Stone, District 3, Chairman  
Supervisorial District 4  
Supervisor Marion Ashley, District 5  
Bill Luna, CEO *(via email only)*  
Kecia Harper-Ihem, COB *(via email only)*  
Valerie Hill, Sheriff's Department *(via email only)*

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5 Attorneys for Plaintiff  
The Regents of the University of California  
6  
7

CONFIRMED COPY  
OF ORIGINAL FILED  
Los Angeles Superior Court

FEB 21 2008

John A. Clarke, Executive Officer/Clerk

By Julia Rojas

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF LOS ANGELES

10 WEST DISTRICT (SANTA MONICA)

John H. Reid

12 THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA,

13 Plaintiff,

14 vs.

15 UCLA PRIMATE FREEDOM; ANIMAL  
16 LIBERATION BRIGADE; ANIMAL  
LIBERATION FRONT; LINDA FAITH  
17 GREENE (AKA LINDY GREENE);  
HILLARY RONEY; KEVIN OLLIFF;  
18 RAMIN SABER; TIM RUSMISEL and  
DOES 1-100, inclusive,

19 Defendants.  
20  
21

Case No. SC097145

COMPLAINT FOR INJUNCTIVE  
RELIEF - PRELIMINARY AND  
PERMANENT INJUNCTIONS

(Harassment - C.C.P. § 527.6; Trespass;  
Intentional Infliction of Emotional Distress;  
Violation of California Constitutional Right  
to Privacy; Intrusion Into Private Affairs;  
Intentional Interference With Business  
Relations)

INITIAL CASE MANAGEMENT REVIEW  
AND CONFERENCE

JUN 10 2008

26:30 Dept F

23 Plaintiff The Regents of the University of California brings this action for preliminary and  
24 permanent injunctive relief under the laws of California as follows:

25 //

26 //

27 //

28

1 INTRODUCTION

2 1. Plaintiff The REGENTS OF THE UNIVERSITY OF CALIFORNIA ("The  
3 REGENTS") is a California public corporation that is the governing body for the University of  
4 California system, with authority over the affairs, operations, employees, policies and procedures  
5 of the ten University of California campuses, including the University of California, Los Angeles  
6 ("UCLA"), and is established pursuant to the California Constitution, Article IX, Section 9.

7 2. Because Defendants believe that employees and students of The REGENTS use  
8 animals in their research, oversee those who use animals in their research, or support those who  
9 use animals in their research, The REGENTS and their employees have become the target of  
10 numerous animal rights groups. In recent years, several inter-related groups have emerged with  
11 the expressly stated goal of ending animal research at UCLA. Defendants ANIMAL  
12 LIBERATION FRONT ("ALF"), ANIMAL LIBERATION BRIGADE ("ALB"), and UCLA  
13 PRIMATE FREEDOM, along with several individuals, have engaged in a coordinated campaign  
14 of harassment, intimidation, vandalism, and physical violence specifically targeted against The  
15 REGENTS and its employees and/or students.

16 3. From the beginning, ALF and ALB have renounced traditional, lawful, non-violent  
17 methods of accomplishing their stated goals. Their campaign against employees of The  
18 REGENTS began with unruly demonstrations on the UCLA campus, but quickly expanded to  
19 target individuals in the conduct of their private lives. Employees began receiving threatening  
20 telephone calls at their home phone numbers and packages at their home addresses containing  
21 animal fur, oil, and razor blades. These harassing acts escalated to trespass and vandalism against  
22 employees' real and personal property. Clad in black and wearing masks to conceal their  
23 identities, persons affiliated with ALF and ALB entered employees' properties in the middle of the  
24 night, shouted slogans and epithets through megaphones, and defaced employees' homes. UCLA  
25 PRIMATE FREEDOM supports groups such as ALF and ALB by maintaining a list of "Targets"  
26 on its webpage, [www.uclaprimatefreedom.com](http://www.uclaprimatefreedom.com), which includes employees' photos, home  
27 addresses and telephone numbers. UCLA PRIMATE FREEDOM also encourages the illegal  
28 actions against employees of The REGENTS by participating in home and campus demonstrations

1 and by posting reports of the demonstrations and vandalism after such actions have occurred.  
2 During demonstrations on the UCLA campus and at employees' homes, demonstrators can be  
3 heard calling out "ALF" and "UCLA PRIMATE FREEDOM dot com."

4 4. As with their campaign against researchers at other universities and private  
5 companies, the campaign against employees of The REGENTS has been steadily escalating in  
6 intensity and ferocity. UCLA PRIMATE FREEDOM's webpage posted the home addresses of  
7 several employees of The REGENTS as "targets" and encouraged its members and the larger  
8 public to harass them. The webpage also included flyers accusing employees of violent acts  
9 against animals that Defendants encourage others to distribute in employees' neighborhoods.  
10 What started as public demonstrations has morphed into violent attacks. Employees listed as  
11 "targets" have been under siege in their homes as the attacks make them fearful for their own  
12 safety and that of their families.

13 5. The cycle of violence and threats reached new and potentially deadly levels  
14 beginning in June 2006. Since June 2006, terrorists affiliated with ALF and ALB have planted  
15 explosive devices near cars, on employee doorsteps, have flooded homes, and threatened similar  
16 acts of violence.

17 6. With each threat and act of violence, ALF, ALB, UCLA PRIMATE FREEDOM  
18 and the Individual Defendants have consistently stated that these acts are merely a "warning of  
19 things to come." Chants made by the Individual Defendants ominously warn employees: "We  
20 know who you are, we know what you look like, we know where you socialize, and best of all we  
21 know where you live!" According to communiqués from these groups, these violent and illegal  
22 acts "will only get worse from here. With every day that goes by . . . our anger and vengeance  
23 grows."

24 7. The REGENTS, on behalf of their affected employees and students, now seek  
25 preliminary and permanent injunctive relief to prevent Defendants from continuing their campaign  
26 of harassment, intimidation, and abuse. The harm already done to The REGENTS' employees and  
27 students is great and irreparable. If Defendants are not immediately restrained and enjoined, the  
28

1 harassment will continue and escalate in severity, putting all of The REGENTS' employees and  
2 students in imminent danger of suffering extreme and irreparable injury.

### 3 JURISDICTION AND VENUE

4 8. This Court has jurisdiction over this matter because the injuries that Plaintiff has  
5 suffered, and the immediate threat of harm for which Plaintiff seeks permanent injunctive relief,  
6 have occurred and will occur at employees' and students' homes and places of employment  
7 throughout California.

8 9. Venue is proper in Los Angeles County pursuant to Code of Civil Procedure  
9 Section 392 and/or Section 395. Employees of The REGENTS, have sustained damage to real and  
10 personal property located in Los Angeles County. The immediate threat of harm to employees and  
11 students of The REGENTS extends to property located within Los Angeles County and elsewhere  
12 in California, and to those of The REGENTS' employees who work and/or reside in Los Angeles  
13 County, as well as throughout California.

### 14 PARTIES

15 10. Plaintiff The REGENTS OF THE UNIVERSITY OF CALIFORNIA is a California  
16 public corporation that is the governing body for the University of California system, with  
17 authority over the affairs, operations, employees, policies and procedures of the ten University of  
18 California campuses, and is established pursuant to the California Constitution, Article IX, Section  
19 9. Its principal place of business is in Oakland, Alameda County, California.

20 11. The REGENTS are informed and believe, and on that basis allege, that Defendant  
21 UCLA PRIMATE FREEDOM is an extremist animal rights organization and is a chapter of a  
22 national organization, the Primate Freedom Project. UCLA PRIMATE FREEDOM maintains a  
23 website on which it promotes and organizes its unlawful activity, [www.uclaprimatefreedom.com](http://www.uclaprimatefreedom.com).  
24 That webpage is registered to the following address: Primate Freedom Project, P.O. Box 1623,  
25 Fayetteville, Georgia 30214.

26 12. The REGENTS are informed and believe, and on that basis allege, that Defendant  
27 ANIMAL LIBERATION FRONT (ALF) is an extremist animal rights organization with  
28 operations around the world, including the United States. ALF has an online press office which

1 promotes and facilitates its illegal activities. The ALF Press Office website,  
2 www.animalliberationpressooffice.org, lists the organization's address as 6320 Canoga Avenue,  
3 #1500, Woodland Hills, California 91367. ALF is currently subject to a Preliminary Injunction in  
4 Santa Barbara County for its illegal and harassing actions against Wachovia Bank and its  
5 employees.

6 13. The REGENTS are informed and believe, and on that basis allege, that Defendant  
7 ANIMAL LIBERATION BRIGADE (ALB) (also known as the Revolutionary Cells – Animal  
8 Liberation Brigade) is a violent extremist animal rights organization with operations around the  
9 world, including the United States. In a communiqué posted anonymously to several websites,  
10 ALB describes itself as follows:

11 Who are the revolutionary cells? It is an anti-gmo activist destroying a gmo crop, it  
12 is a basque youth driving a car packed with explosives destined for a spanish  
13 politician, it is a queer bashing back, a rape victim putting a bullet in the rapist, a  
14 corsican nationalist planting a bomb at a french bank, it is a cincinatti riot in  
15 response to police brutality, an animal liberationist shooting a vivisector dead on  
16 his doorstep. In short it is the spirit of resistance realized. It is moving from  
17 politics to praxis.

18 (Emphasis added). Anonymous communiqués regarding the illegal tactics of ALB are posted on  
19 several websites, including the ALF Press Office website and UCLA PRIMATE FREEDOM's  
20 website. In its communiqués, ALB regularly posts the home addresses and other personal  
21 information of the victims of its assaults. ALB is sometimes referred to interchangeably with  
22 ALF.

23 14. The REGENTS are informed and believe, and on that basis allege, that Defendant  
24 LINDA FAITH GREENE (AKA LINDY GREENE) is associated with UCLA PRIMATE  
25 FREEDOM, ALB, and ALF, as well as other extremist animal rights organizations, and has been  
26 involved in the organizations' unlawful activity, including illegal and harassing conduct directed at  
27 employees and students of The REGENTS. The REGENTS are informed and believe, and on that  
28 basis allege, that GREENE resides in Valley Village, Los Angeles County, California. GREENE

1 is currently subject to a temporary restraining order in Los Angeles County for her harassment of  
2 the ex-wife of a City of Los Angeles employee; the harassment is alleged to be centered on animal  
3 rights issues. GREENE is also subject to a preliminary injunction in Los Angeles County for her  
4 harassment of employees of POM Wonderful, the harassment is alleged to be centered on animal  
5 rights issues.

6 15. The REGENTS are informed and believe, and on that basis allege, that Defendant  
7 HILLARY RONEY is associated with UCLA PRIMATE FREEDOM, ALB, and ALF, as well as  
8 other extremist animal rights organizations, and has been involved in the organizations' unlawful  
9 activity, including illegal and harassing conduct directed at employees and students of The  
10 REGENTS. The REGENTS are informed and believe, and on that basis allege, that HILLARY  
11 RONEY is a resident of Los Angeles, California. RONEY is also subject to a preliminary  
12 injunction in Los Angeles County for her harassment of employees of POM Wonderful, the  
13 harassment is alleged to be centered on animal rights issues.

14 16. The REGENTS are informed and believe, and on that basis allege, that Defendant  
15 KEVIN OLLIFF is associated with UCLA PRIMATE FREEDOM, ALB, and ALF, as well as  
16 other extremist animal rights organizations, and has been involved in the organizations' unlawful  
17 activity, including illegal and harassing conduct directed at employees and students of The  
18 REGENTS. The REGENTS are informed and believe, and on that basis allege, that KEVIN  
19 OLLIFF is a resident of Los Angeles County, California. KEVIN OLLIFF is currently subject to  
20 a Preliminary Injunction issued on January 29, 2008 in Santa Barbara County for his illegal and  
21 harassing actions against Wachovia Bank and its employees. OLLIFF is also subject to a  
22 preliminary injunction in Los Angeles County for his harassment of employees of POM  
23 Wonderful, the harassment is alleged to be centered on animal rights issues.

24 17. The REGENTS are informed and believe, and on that basis allege, that Defendant  
25 RAMIN SABER is associated with UCLA PRIMATE FREEDOM, ALB, and ALF, as well as  
26 other extremist animal rights organizations, and has been involved in the organizations' unlawful  
27 activity, including illegal and harassing conduct directed at employees and students of The  
28 REGENTS. The REGENTS are informed and believe, and on that basis allege, that RAMIN

1 SABER is a resident of Reseda, Los Angeles County, California. SABER is also subject to a  
2 preliminary injunction in Los Angeles County for his harassment of employees of POM  
3 Wonderful, the harassment is alleged to be centered on animal rights issues.

4 18. The REGENTS are informed and believe, and on that basis allege, that Defendant  
5 TIM RUSMISEL is associated with UCLA PRIMATE FREEDOM, ALB, and ALF, as well as  
6 other extremist animal rights organizations, and has been involved in the organizations' unlawful  
7 activity, including illegal and harassing conduct directed at employees and students of The  
8 REGENTS. The REGENTS are informed and believe, and on that basis allege, that TIM  
9 RUSMISEL is a resident of San Clemente, Orange County, California.

10 19. The REGENTS are informed and believe, and on that basis allege, that Defendants  
11 LINDA GREENE, HILLARY RONEY, KEVIN OLLIFF, RAMIN SABER, TIM RUSMISEL  
12 and DOES 1 through 100 (collectively, the "Individual Defendants") were responsible for and  
13 participated in the acts complained of herein and were at all relevant times representatives, co-  
14 conspirators, acting in concert with, agents, followers, employees, partners, members, and/or  
15 directors of UCLA PRIMATE FREEDOM, ALB, and/or ALF. The REGENTS are ignorant of the  
16 true names and capacities of DOES 1 through 100 and therefore sue these defendants by fictitious  
17 names. The REGENTS will amend this complaint to allege the true names and capacities of the  
18 DOE defendants when their names and identities are revealed through discovery.

19 20. The REGENTS are informed and believe, and on that basis allege, that UCLA  
20 PRIMATE FREEDOM, ALB, ALF, LINDA GREENE, HILLARY RONEY, KEVIN OLLIFF,  
21 RAMIN SABER, TIM RUSMISEL and DOES 1 through 100 (collectively, "Defendants") were,  
22 at all relevant times, the agents, followers, co-conspirators, employees, representatives, partners,  
23 directors, and/or joint venturers of each other and were acting within scope of those relationships  
24 when committing the unlawful acts described below. The REGENTS are further informed and  
25 believe, and on that basis allege, that each Defendant ratified, authorized, aided, and/or abetted the  
26 unlawful acts described below.

27 21. The REGENTS are informed and believe, and on that basis allege, that Defendants  
28 conspired with each other to commit assault, trespass, property destruction, and harassment and to

1 make threats of violence against The REGENTS, their students, their employees and their  
2 families, and to further cause them severe emotional distress.

### 3 FACTUAL ALLEGATIONS

#### 4 The Unlawful Campaign Against Animal Researchers

5 22. The REGENTS oversee 10 university campuses across the state of California,  
6 including UCLA. Students and employees of The REGENTS located at UCLA and elsewhere  
7 conduct research, some of which involves the closely regulated use of animals.

8 23. In recent years, some extremist animal rights groups and their members and  
9 followers have joined together in a coordinated campaign against The REGENTS. These groups  
10 include UCLA PRIMATE FREEDOM, ALF, and ALB.

11 24. Unlike other animal rights groups, both ALF and ALB have expressly rejected  
12 lawful, nonviolent means of accomplishing their goal. ALF provides advice to its followers on  
13 ways to evade and deter law enforcement efforts. On its website, ALF encourages members to  
14 download PGP, an email encryption software, and provides instructions, "If An Agent Knocks."  
15 Through communiqués posted on various websites, ALF has taken credit for illegal and violent  
16 actions across the country and internationally. ALF has been described as a domestic terrorist  
17 threat in the United Kingdom, and in January 2005, was named as a terrorist threat by the United  
18 States Department of Homeland Security.

19 25. The ALB is a self-described "revolutionary cell" that cites as an exemplary tactic  
20 "an animal liberationist shooting a vivisector dead on his doorstep." Anonymous members of the  
21 ALB publish communiqués regarding the illegal tactics of ALB on several websites. Such  
22 communiqués are regularly posted on the website maintained by ALF's Press Office.

23 26. In their communiqués, ALF and ALB regularly post the home addresses and other  
24 personal information of the victims of their assaults. Victims of these groups' campaign against  
25 researchers at UCLA have been subjected to death threats, verbal abuse and violent attacks. They  
26 have received packages rigged with razor blades, disturbing late-night phone calls, and late-night  
27 acts of vandalism and terror, including attempted firebombings of cars and homes and flooding of  
28 homes.

1           27.    Rather than focus their demonstrations at workplace sites, ALF, ALB and UCLA  
2 PRIMATE FREEDOM emphasize so-called "home visits." Masked persons working with ALF  
3 and/or ALB and UCLA PRIMATE FREEDOM trespass onto the property of an employee of The  
4 REGENTS, often at night. They attempt to terrorize the employee and family members by  
5 violently pounding on the front door and shouting threats and obscenities through bullhorns; they  
6 vandalize the employee's property by etching slogans on doors, firebombings, breaking windows,  
7 and using hoses to flood homes. As they leave a "home visit," the activists warn the employee and  
8 their family members that they will be back, often cite recent acts of violence taken against other  
9 targets, and vow that they will "never back down." UCLA PRIMATE FREEDOM, ALF, and  
10 ALB then praise, encourage and take credit for these illegal activities on their websites or in  
11 communiqués posted on the websites of others, often publishing the names, home addresses, and  
12 home telephone numbers of employees who have been targeted for "home visits." UCLA  
13 PRIMATE FREEDOM maintains a frequently updated website on which it posts UCLA  
14 employees' personal information, labeling the employees as "Targets" and urging others to harass  
15 the employees and their family members.

16           28.    While ALF has taken responsibility for raids on labs for decades, in recent years it  
17 has shifted its tactics to directly targeting researchers and professors in universities to force them  
18 out of their jobs. ALF's escalating attacks on UCLA employees reflect its coordinated and illegal  
19 national campaign on academic researchers.

20           29.    On November 14, 2004, ALF raided and later took credit for an attack on a lab at  
21 the University of Iowa. More than 400 animals were stolen, and two labs and three offices were  
22 broken into with their contents destroyed. Computers, lab devices, papers, and photos that were  
23 both research-related and personal were destroyed by, among other means, acid and caustic  
24 chemicals.

25           30.    Shortly after this incident, as a "public safety measure" ALF listed the names,  
26 addresses, and phone numbers of researchers at the Iowa lab, their spouses, and their students.  
27 Professors subsequently received threats by phone.

28

1 August 2005. Shortly thereafter, Ringach received threatening phone calls at his home where the  
2 female caller warned him to "Watch your back."

3 47. In or about January 2006, Ringach's laboratory assistant received a telephone call  
4 from a Defendant who warned, "You just tell that fucking monkey killer to watch his back when  
5 he's leaving the lab because I am going to fucking kill him."

6 48. Late in the evening of April 28, 2006, and four days after the threats made on the  
7 UCLA campus, Defendants appeared at Ringach's home in Culver City, while he and his family  
8 were home. Among the frightening chants intended to intimidate and harass Ringach and his  
9 family were the following: "Animal killer," "We know where you live," and "We will never give  
10 up." Defendants and others acting in concert with them wore masks to conceal their identities,  
11 repeatedly banged on Ringach's front door, and entered his property to upend trash bins and  
12 destroy personal property. The Ringach family, in fear for their safety, called the Culver City  
13 Police and held the phone in the vicinity of the front door, which was repeatedly pounded and hit.  
14 Concerned that Defendants would continue and escalate the attacks as promised, UCLA arranged  
15 for private security officers to watch the home.

16 49. Defendants' campaign of harassment directed at Ringach and his family, including  
17 his small children, continued throughout May, June and July 2006. Defendants repeatedly  
18 terrorized the family in their own home by using tactics such as throwing firecrackers late at night  
19 onto the family's property.

20 50. Defendants knew that the escalating threats to Ringach and his family would cause  
21 great fear because of their firebomb attack on his colleague during this same period. On the  
22 evening of June 30, 2006, Defendant affiliates of ALF planted a Molotov cocktail-type firebomb  
23 on the doorstep of a neighbor of Fairbanks, though intended for Fairbanks. The firebomb device  
24 was one similar to devices used in the past by ALF, ALB, and other extremist animal rights  
25 organizations. The device failed to detonate.

26 51. On July 11, 2006, in an anonymous communiqué posted on  
27 [www.uclaprimatefreedom.com](http://www.uclaprimatefreedom.com) and [www.animalliberationpressoffice.org](http://www.animalliberationpressoffice.org), ALF claimed  
28 responsibility for the attempted firebombing. In doing so, ALF stated:

1 On the night of June 30, we paid a visit to Lynn Fairbanks home ... in Belaire.  
2 Since she is rumored to have a cocktail every evening after a hard days work of  
3 breeding monkeys for painful addiction experiments at UCLA we thought we  
4 would give her a cocktail of our own a moletov cocktail. We left it on her doorstep  
5 but didnt hang around to see if it went off....

6 ALF.

7 52. Days later, on July 15, 2006, Defendants and those acting in concert with them  
8 converged on FAIRBANKS' home. Defendants GREENE, SABER and others used bullhorns to  
9 shout obscenities and threats in front of Fairbanks' home. Defendants, including RAMIN SABER,  
10 cited the recent attempted firebombing, urging the crowd to "Burn that fucker to the ground," and  
11 warning, "You can't stop the ALF." Dismissing the presence of two police officers with the chant  
12 "Forty activists, two cops," Defendants threatened, "What comes around goes around – burn that  
13 fucker to the ground," causing Fairbanks and her family to fear for their safety.

14 53. Earlier during the evening of July 15, 2006, Defendants, including  
15 KEVIN OLLIFF, RAMIN SABER, and LINDA GREENE, returned once again to the home of  
16 Dario Ringach. A security guard was present at the Ringach home at the time and called the  
17 Culver City Police Department. Following the guard's call to the police, Defendants and others  
18 chanted, "Fifteen minutes, no cops...twenty minutes, no cops...a lot can happen in twenty  
19 minutes." Defendants also chanted "Free the animals – ALF" and "We know where you sleep at  
20 night." KEVIN OLLIFF yelled at the home, "What can happen in eleven minutes, Dario?"

21 54. Throughout the rest of the summer of 2006, UCLA researchers received hundreds  
22 of threatening emails, phone calls, and home visits. The persons behind these emails and phone  
23 calls asserted that the harassment would not stop until the employees ceased using animals in their  
24 research.

25 55. Frightened for the safety of his family because of the attacks on his colleagues and  
26 the threatening home visits, Dario Ringach ceased doing animal research in August 2006. On or  
27 about August 4, 2006, Ringach sent an email to animal rights group containing the message,  
28 "Effective immediately, I am no longer doing animal research. . . . Please don't bother my family

1 anymore." On or about August 7, 2006, The REGENTS issued a press release confirming  
2 Ringach's decision to halt his primate research. On or about August 18, 2006, UCLA PRIMATE  
3 FREEDOM updated its webpage to boast about Ringach's email.

4 56. In response to Ringach's decision to terminate his research program, The  
5 REGENTS were forced to expend hundreds of thousands of dollars in retrofitting Ringach's  
6 laboratory for a different research protocol.

7 57. The resignation of Ringach only resulted in the addition of new UCLA "Targets."  
8 UCLA PRIMATE FREEDOM clarified this new approach by updating its webpage to include a  
9 section entitled "Targets," which included Joaquin Fuster, professor emeritus at UCLA,  
10 Nelson Freimer, a professor in residence in psychiatry and bio-behavioral sciences at UCLA,  
11 Lynn Fairbanks, Roberto Peccei and Norman Abrams as of February 2007. The "Targets"  
12 webpage included each professor's home address and phone number. On October 8, 2006,  
13 Defendants assailed the homes of three employees of The REGENTS – Norman Abrams, then  
14 UCLA's Acting Chancellor, Roberto Peccei, Vice Chancellor for Research at UCLA, and Nelson  
15 Freimer, an employee whom Defendants believed was involved in animal research. While at  
16 Abrams' home, Defendants used a bullhorn to scream epithets. After moving on from Abrams'  
17 home, Defendants went to Peccei's home, wearing masks and shouting threats. Next, Defendants  
18 and others made threatening and obscene chants at Freimer's home.

19 58. Defendants and others appeared on the UCLA campus on October 9, 2006.  
20 Defendant LINDA GREENE led the group, using a bullhorn to shout, "Dario Ringach that coward  
21 was a big brave boy in the lab torturing those animals, but a few pickets scared him off, we can  
22 only hope you psychos go so easily." GREENE also exclaimed, "A few pickets at  
23 Lynn Fairbanks' home and the bitch left town," and "We will never back down until the killing  
24 stops." This last statement was repeated emphatically by the entire group, as were frequent chants  
25 of "ALF."

26 59. On November 19, 2006, Defendants GREENE, SABER, and RONEY, along with  
27 Pamelyn Ferdin and others, led threatening chants at Nelson Freimer's home that included "We  
28 know where you sleep at night," and "We will never back down . . ." Later that evening,

1 Defendant TIM RUSMISEL made the statement, "You force us underground," while the group  
2 was at the home of an individual associated with the company POM Wonderful, which had  
3 previously obtained a restraining order to stop the harassment of its employees. Masked  
4 Defendants also visited Peccei's home that day, where his wife was home alone.

5 60. On December 23, 2006, Defendants and others, including LINDA GREENE,  
6 HILLARY RONEY, and RAMIN SABER, again converged on the homes of Peccei and Fuster,  
7 where they shouted, "Free the animals – ALF" and, "No more compromise." One Defendant using  
8 a bullhorn exclaimed, "Sometimes it's way worse than this."

9 61. On January 19, 2007, Defendants and others, including TIM RUSMISEL, LINDA  
10 GREENE, and HILLARY RONEY demonstrated on the UCLA campus. RUSMISEL stated,  
11 "Today you are lucky. You are receiving the fluffy-end . . ." and, "We are not always this  
12 friendly." Defendants chanted, "Burn the fuckers to the ground," immediately followed by, "Visit  
13 UCLA PRIMATE FREEDOM dot com," the website home to the "target" list of UCLA  
14 employees and their residential addresses and phone numbers.

15 62. On February 14, 2007, Defendants GREENE, SABER and RONEY and others  
16 blocked employees from entering buildings on the UCLA campus. Defendants banged on doors  
17 and windows of a campus building. Defendants GREENE and RONEY pointed their fingers in a  
18 "gun" position and repeatedly took "shots" at the research building where several employees'  
19 offices are located. RONEY yelled, "Every move you make, we'll find out where you are and  
20 always be there." Defendants, including TIM RUSMISEL, repeatedly cited "UCLA PRIMATE  
21 FREEDOM dot com." That same day, UCLA PRIMATE FREEDOM's website was updated to  
22 add new "Targets" – Roberto Peccei and Norman Abrams, accompanied by their home addresses  
23 and telephone numbers.

24 63. On March 18, 2007, Defendants and others paid home visits to Fuster, Freimer,  
25 Abrams, and Peter Anton, a newly identified "Target." Anton was named a "Target" on the UCLA  
26 PRIMATE FREEDOM webpage on or about early 2007, and his Los Angeles home address and  
27 telephone number were made publicly available on that website. Defendants and others began  
28 their day at Fuster's home in Los Angeles. RONEY led chants, including, "We will continue to

1 companies that engage in animal research, such as Huntington Life Sciences (HLS), Chiron  
2 Corporation, Wachovia Bank, and other companies who invest in companies such as HLS.

3 **ALF Members and Defendants Herein Have Been Convicted of Numerous Crimes**  
4 **and Enjoined By Courts Around the Country**

5 38. Several ALF activists and other animal rights terrorists recently have been jailed  
6 for their crimes. For example, in December 2006, Donald Currie was jailed for 12 years and  
7 placed on probation for life after being found guilty of planting homemade bombs on the  
8 doorsteps of businessmen with links to HLS. In January 2006, the U.S. Department of Justice  
9 announced charges against nine Americans and two Canadians who called themselves the  
10 "Family," and engaged in direct action on ALF's behalf.

11 39. Based on these and other unlawful activities, a number of targeted organizations  
12 and individual victims have obtained temporary restraining orders and preliminary and permanent  
13 injunctions against ALF, related extremist groups, and/or affiliated individual defendants in courts  
14 throughout the nation. *See, e.g., Huntingdon Life Sciences v. SHAC USA, et al.*, Superior Court of  
15 the State of California, San Diego County Superior Court Case No. GIC812248 (JRH) (injunction  
16 against individuals working in concert with extremist group); *Forest Laboratories, Inc. v. Animal*  
17 *Liberation Front, et al.*, New York Supreme Court Case No. 006527/05 (DM) (injunction against  
18 ALF); *Wachovia Corp., et al. v. Animal Liberation Front, et al.*, Santa Barbara County Superior  
19 Court Case No. 1264894 (preliminary injunction entered against ALF and an individual working  
20 in conjunction with ALF).

21 40. In 2006, POM Wonderful obtained a Temporary Restraining Order and Preliminary  
22 Injunction against Defendants GREENE, RONEY, SABER and OLLIFF for their harassment of  
23 the company's employees. The injunction became permanent on July 3, 2007.

24 41. In November 2007, Wachovia Bank obtained a Temporary Restraining Order  
25 against Defendant KEVIN OLLIFF for his harassment of bank employees in Santa Barbara,  
26 California. The court then issued a Preliminary Injunction against OLLIFF and his co-defendants  
27 on January 29, 2008.

28

1           42.    In December 2007, the Los Angeles County Superior Court issued a Temporary  
2 Restraining Order against Defendant LINDA GREENE for her harassment of the ex-wife of a Los  
3 Angeles City employee.

4                   **ALF, ALB and UCLA PRIMATE FREEDOM Target REGENTS' Employees**

5           43.    The campaign of harassment against UCLA researchers and their families at their  
6 private residences began as early as the 1980s. In recent years, occurring in conjunction with  
7 those protests was a series of underground events targeting faculty members and other researchers  
8 at their homes. Faculty members and researchers were subject to harassing phone calls at home at  
9 all hours of the day and night, threatening emails and letters, and home demonstrations often  
10 conducted with noise-amplification devices that frightened children and harassed entire  
11 neighborhoods.

12           44.    This long running campaign has increased in intensity over the last two years. In or  
13 about April 2006, demonstrators converged on UCLA faculty member Lynn Fairbanks' home in  
14 Los Angeles while her two sons were at home. Defendants arrived around 11:00 p.m., banging  
15 loudly on Fairbanks' front door while wearing ski masks.

16           45.    On or about April 24, 2006, Defendants OLLIFF, SABER, GREENE and others  
17 gathered in an area near the UCLA medical center. They carried graphic signs depicting mutilated  
18 animals purportedly, but falsely, connected to research conducted at UCLA. Defendants OLLIFF,  
19 SABER, GREENE and others led threatening chants designed to instill fear in employees and/or  
20 students conducting animal research. They identified themselves as affiliated with ALF and the  
21 violence conducted by that group, and repeatedly stated, "We know where you sleep at night."  
22 During this protest, KEVIN OLLIFF hit a UCLA property officer with a sign. During the protest,  
23 defendant GREENE boasted, "Animal rights activists are now the number one domestic terrorists  
24 in the U.S. We must be doing something fucking right."

25           46.    Defendants then turned their attention to Dario Ringach, a researcher at UCLA.  
26 Ringach became a target of escalating threats and attacks by Defendants. UCLA PRIMATE  
27 FREEDOM posted Ringach's home phone number and address on its website in approximately  
28

1 come back and we will never back down . . . until you stop the killing." RONEY also chanted,  
2 "We will be back again and again." GREENE was observed going up Fuster's driveway to the  
3 gate that blocked Defendants and others from the front door. GREENE also used a megaphone to  
4 shout insults at Fuster. Fuster evacuated his wife prior to the incident because, this time, he had  
5 received prior warning. Fuster's wife has a heart condition that is aggravated by stress from the  
6 Defendants' harassment. Next, at Freimer's Santa Monica home, Defendants and others distributed  
7 flyers around the neighborhoods accusing employees of The REGENTS of committing violent  
8 acts upon animals. GREENE shouted obscenities, including, "You fucking pervert, you sick  
9 twisted fucking pervert." Defendants and others yelled, "The police don't know every aspect of  
10 the movement, there is an aspect you don't know about and hopefully will never see. Send out the  
11 email tomorrow, say 'I quit.'" Chants also included, "We know where you sleep at night" and  
12 repeated references to ALF. Defendants and others then went to Abrams' home. Defendants  
13 warned, "What goes around comes around, let's burn this fucker to the ground." Defendants  
14 finished their day at Anton's home in Los Angeles. When they were unable to get into his secured  
15 building, they left threatening telephone messages for him.

16 64. On Easter Sunday, April 8, 2007, protestors again targeted Freimer's home with  
17 similar chants and threats as the previous attacks.

18 65. Then, on April 27, 2007, Defendants gathered for a "home visit" targeting both  
19 Peccei and Fuster between 9:00 p.m. and 10:30 p.m. Neighbors of each employee reported that  
20 the yelling frightened their children.

21 66. On the evening of May 6, 2007, a demonstrations occurred at the home of Nelson  
22 Freimer and Roberto Peccei. Defendants and others wore masks and banged on Freimer's front  
23 door as they yelled, "We're the ALF and we know who you are, we know where you are." At  
24 Peccei's home, approximately a dozen masked Defendants arrived at Peccei's home, banging on  
25 the front door inside the home's gated patio while yelling threats and obscenities, including "We  
26 know where you sleep at night."

27 67. Again following through on their threats, Defendants resorted once more to a  
28 firebomb attack. On June 24, 2007, Defendants placed a firebomb under the car of Arthur

1 Rosenbaum, which was parked in front of his home. Police were called to the scene and portions  
2 of Rosenbaum's neighborhood were evacuated. Although Defendants had lit the fuse on the  
3 firebomb, it failed to detonate prior to police intervention.

4 68. The ANIMAL LIBERATION BRIGADE, in an "anonymously" received  
5 communiqué dated June 27, 2007, and posted on [www.animalliberationpressoffice.org](http://www.animalliberationpressoffice.org), took  
6 responsibility for the attempted firebombing of Rosenbaum's car and issued additional threats:

7 130am on the twenty fourth of june: 1 gallon of fuel was placed and set a light under  
8 the right front corner of Arthur Rosenbaums large white shiney BMW. He and his  
9 wife Sandy, ... are the target of rebellion...Rosenbaum, you need to watch your  
10 back because next time you are in the operating room or walking to your office you  
11 just might be facing injections into your eyes like the primates, you sick twisted  
12 fuck. Demonstrators need to realize that just demonstrating won't stop this kind of  
13 evil....

14 animal liberation brigade

15 69. Three days later, on June 30, 2007, Defendants RONEY, GREENE, and others  
16 followed up at Rosenbaum's home. Defendants chanted Rosenbaum's home address as the target  
17 of the demonstration. Defendants also yelled, "Hey Arthur, how's your BMW doing?" One  
18 Defendant took pictures of the front of Rosenbaum's home and posted them on the internet.  
19 Defendants then went to Abrams' home. GREENE led the chanting, citing the ALF and  
20 exclaiming, "Animal killers leave town, primate killers leave town," and "We know where you  
21 live and sleep at night." The group then arrived at Fuster's home, again citing the ALF and  
22 warning, "We know where you sleep at night." Fuster again was forced to leave his residence in  
23 order to remove his wife from an unsafe situation. Defendants and others next arrived at Freimer's  
24 residence. After that protest ended, a picture of Freimer's car was the first picture posted on a  
25 webpage devoted to photos of animal protest actions, suggesting Freimer's vehicle as the next  
26 firebombing target.

27

28

1           31.    On April 22, 2005, ALF raided a Louisiana State University research lab. Activists  
2 took mice and mixed them in different cages and removed their identification plaques, smashed  
3 windows and aquariums, spray painted and paint-stripped walls, and glued locks.

4           32.    On January 5, 2007, ALF attacked and took credit for a "home visit" on a professor  
5 at the University of Utah. Activists vandalized the professor's vacant home, putting glass-eating  
6 acid on the windows and covering the house in slogans with paint. The follow-up communiqué  
7 further threatened the professor by listing his other homes as potential targets.

8           33.    On April 26, 2007, ALF made good on the threat against the University of Utah  
9 professor and took credit for another attack on the professor's other home. Activists glued all the  
10 locks on the doors to the house, spray painted slogans on the Jacuzzi, smashed out a front window,  
11 and poured a salt solution to destroy the front lawn.

12           34.    In July 2007, ALF vandalized an Oregon Health and Science University professor's  
13 home. Activists poured chemicals on and spray painted his car, and spray painted the message  
14 "ALF eyes on you!" onto his garage door. ALF followed up in a communiqué warning the  
15 professor to "Look out behind you" and suggested fire bombs would be next.

16           35.    On December 6, 2007, ALF struck again at Oregon Health and Science University.  
17 This time, ALF vandalized the cars at the home of another researcher. Using paint stripper and  
18 graffiti, the activists left the words "ALF" and "sadist" on the cars.

19           36.    In recent months, similar activities have occurred at the homes of faculty members  
20 of the Berkeley, San Francisco, Santa Cruz, and Santa Barbara campuses of the University of  
21 California, suggesting that those employees of The REGENTS may be Defendants' next target.  
22 Along with home demonstrations, there have been reports of prowlers in the backyards of  
23 professors' homes late at night and vandalism of property. Outdoor faucets have been turned on in  
24 a tactic reminiscent of the flooding of UCLA faculty member Edythe London's home.

25           37.    The acts of terror and violence committed by ALF and ALB are not limited to  
26 employees of The REGENTS and academics nationally. For example, from at least December  
27 1999 through the present, ALF and ALB members have engaged in illegal tactics including  
28 firebombing of cars, pepper spray assaults, vandalism, and battery against employees of

1           70.    On July 15, 2007, at 3:00 a.m., a Defendant attacked Peccei's home by banging on  
2 his door and smearing dirt on windows. The Defendant shouted, "Roberto Peccei, you will never  
3 be safe."

4           71.    On July 21, 2007, at 7:43 p.m., Defendants again returned to Rosenbaum's home.  
5 Demonstrators chanted, "For the animals we will fight, we know where you sleep at night."  
6 RONEY and GREENE were present, but wore masks in an attempt to hide their identities and  
7 intimidate Rosenbaum and his family.

8           72.    On July 19, 2007, Defendants mailed a package containing razor blades, animal  
9 fur, and oil to Rosenbaum's residence and addressed to his wife. The package told her to persuade  
10 her husband to stop his animal research, or "What he does to the animals we will do to you." The  
11 package was signed "ALF." On July 22, 2007, a communiqué from ALF claiming responsibility  
12 for this package was posted on [www.animalliberationpressoffice.org](http://www.animalliberationpressoffice.org).

13           73.    On July 29, 2007, in another anonymous communiqué posted on  
14 [www.animalliberationpressoffice.org](http://www.animalliberationpressoffice.org), and linked to by UCLA PRIMATE FREEDOM's website,  
15 additional threats were made against Rosenbaum regarding the razor blade-filled package sent to  
16 his home:

17           An interesting package was mailed to the home of Arthur Rosenbaum .... Be  
18 careful Arthur. *We are only just getting started. This action is a mere token when*  
19 *compared to the other things that we can and will do.* Your address and your  
20 phone numbers are out along with your dirty and disgusting secrets and you will be  
21 feeling even more pressure. You have one choice. Stop vivisectioning!

22 (Emphasis added).

23           74.    On August 6, 2007, Rosenbaum received a postcard stating, "Hey I'm thinking of  
24 you today, that's all I want to say. Except that I pray when you die, you are treated the same way  
25 that animals are treated today."

26           75.    On September 13, 2007, a neighbor of Rosenbaum observed individuals in a  
27 Chrysler Avenger videotaping the front of Rosenbaum's house.

28

1           76.    On September 16, 2007, Defendants and others converged on Rosenbaum's home.  
2 Leaflets containing Rosenbaum's picture, home address and phone number were distributed  
3 around the neighborhood. Defendant GREENE led chants, "Stop the murder, stop the death, free  
4 the animals, ALF," and "Arthur Rosenbaum burn in hell..." Rosenbaum's name and home address  
5 were also broadcast using a bullhorn.

6           77.    On or about October 17, 2007, Defendants left three threatening voice mails at  
7 Anton's home telephone number. One message said there was a bomb in his car. Another  
8 message consisted of a person screaming into the phone. In a third message, the caller threatened,  
9 "You keep torturing and abusing animals and we're gonna burn up all your shit. We can cause  
10 more economic damage in one night than you can earn in a year. Fuck you asshole."

11           78.    On or about October 20, 2007, Defendants trespassed onto a Beverly Hills  
12 residential property they believed belonged to Edythe London, a professor in residence in  
13 psychiatry and bio-behavioral sciences at UCLA, breaking a window and flooding the home with  
14 a hose.

15           79.    On October 26, 2007, ALF took credit for the London flooding, posting a  
16 communiqué on [www.animalliberationpressoffice.org](http://www.animalliberationpressoffice.org) and UCLA PRIMATE FREEDOM's  
17 website and making additional threats:

18           ANIMAL LIBERATION FRONT STRIKES UCLA VIVISECTION

19           WATERFRONT PROPERTY IN BEVERLY HILLS FOR SALE!

20           Edythe London ... You are now in the spotlight of justice. Your address at ...

21           Shadybrook Drive in Beverly Hills is now publicized for all to see. Until we see the  
22 end of primate vivisection at UCLA we will remind you of our presence. Push them  
23 to stop Edythe or we keep pushing. We never back down. We always win.

24           Here's how we get started. We found your million dollar house in Beverly Hills on  
25 the windy night of Saturday October 20, we discovered you weren't home so we  
26 snuck around to your backyard. First we effectively clogged the intake drain of  
27 your pool pump. It probably ran dry for a couple of hours and burned itself out. If it  
28 didn't happen, wait for it. It will. Next we smashed a window and inserted your

1 garden hose, turned on to full blast of course. Bet you were surprized when you  
2 came home. Edythe do you have flood insurance?

3 One more thing Edythe, water was our second choice, fire was our first. ...As you  
4 slosh around your flooded house consider yourself fortunate this time.

5 We will not stop until UCLA discontinues its primate vivisection programe.

6 We are the ALF

7 (Emphasis added.)

8 80. On December 16, 2007, Defendants and others staged another demonstration at the  
9 Beverly Hills property they believed belonged to Edythe London.

10 81. On December 22, 2007, Defendants and others staged another demonstration at  
11 Rosenbaum's home and the property they believed belonged to Edythe London.

12 82. As a result of Defendants' actions, The REGENTS have been forced to hire security  
13 guards and install security systems at several of the employees' homes in order to safeguard them.

14 83. In recognition of the growing threat ALF presents to individuals working in  
15 universities, a January 3, 2008, posting encouraging and promoting illegal behavior at  
16 www.animalliberationpressoffice.org stated as one of the "numerous successes" of 2007: "UCLA,  
17 UCSD and OHSU vivisectors come under increased attack...(June, July, August, October,  
18 November, December)."

19 84. On or about February 5, 2008, Defendants firebombed the Beverly Hills home they  
20 believed belonged to Professor London. On February 6, 2008, the ALF Press Office posted a link  
21 to a press release entitled "ALF Returns (as Promised) to ... Edythe London." This firebombing  
22 caused extensive damage to the property.

23 **FIRST CAUSE OF ACTION**

24 **(Harassment-C.C.P. § 527.6)**

25 **(Against All Defendants)**

26 85. Plaintiff hereby incorporates the allegations in paragraphs 1 through 84 as if fully  
27 set forth herein.

28



1           95.     The REGENTS assert this cause of action on behalf of its employees and students  
2 who are engaged in, oversee, or support those engaged in or overseeing animal research. These  
3 individuals form a well-defined, easily identifiable group, and there is a well-defined community  
4 of interest among the members of this group in being free from Defendants' intimidating and  
5 harassing conduct.

6           96.     No individualized proof of damages is required because Plaintiff seeks only  
7 injunctive relief.

8           97.     By the actions described above, Defendants have intentionally inflicted emotional  
9 distress on The REGENTS' employees and students who are engaged in, oversee, or support those  
10 engaged in or overseeing animal research, and Defendants threaten to continue intentionally  
11 inflicting emotional distress on those individuals.

12           98.     Defendants' intimidating and harassing conduct is extreme and outrageous and  
13 would cause any reasonable person to suffer substantial emotional distress.

14           99.     The REGENTS are informed and believe, and on that basis allege, that its  
15 employees and students have suffered substantial emotional, mental, and physical distress  
16 including, but not limited to, anxiety and sleeplessness, as a direct and proximate result of  
17 Defendants' intimidating and harassing conduct.

18           100.    Defendants, unless and until restrained, will continue to engage in conduct causing  
19 substantial emotional distress to The REGENTS' employees and students who are engaged in,  
20 oversee, or support those engaged in or overseeing animal research. Defendants' conduct has  
21 caused, and will continue to cause, great and irreparable injury to those individuals.

22           101.    Plaintiff has no adequate remedy at law. It is impossible to ascertain the amount of  
23 compensation which, if Defendants are not restrained, would provide Plaintiff with adequate  
24 relief.

25  
26  
27  
28

1 **THIRD CAUSE OF ACTION**

2 **(Violation of California Constitutional Right to Privacy)**

3 **(Against UCLA PRIMATE FREEDOM, ALF, ALB and DOES 1-100)**

4 102. Plaintiff hereby incorporates the allegations in paragraphs 1 through 84 as if fully  
5 set forth herein.

6 103. The REGENTS assert this cause of action pursuant to Article I, Section I of the  
7 California Constitution on behalf of its employees and students who are engaged in, oversee, or  
8 support those engaged in or overseeing animal research. These individuals form a well-defined,  
9 easily identifiable group, and there is a well-defined community of interest among the members of  
10 this group in being free from Defendants' intimidating and harassing conduct.

11 104. No individualized proof of damages is required because Plaintiff seeks only  
12 injunctive relief.

13 105. By the actions described above, Defendants have invaded the privacy interests of  
14 The REGENTS' employees and students who are engaged in, oversee, or support those engaged in  
15 or overseeing animal research.

16 106. The REGENTS' employees and students who are engaged in, oversee, or support  
17 those engaged in or overseeing animal research have a reasonable expectation of privacy as to the  
18 interests invaded.

19 107. The invasions of privacy suffered by The REGENTS' employees and students who  
20 are engaged in, oversee, or support those engaged in or overseeing animal research are serious and  
21 substantial.

22 108. The REGENTS are informed and believe, and on that basis allege, that these  
23 serious and substantial invasions of privacy have caused its employees and students who are  
24 engaged in, oversee, or support those engaged in or overseeing animal research to suffer injury,  
25 damage, loss, and harm.

26 109. Defendants, unless and until restrained, will continue to invade the privacy interests  
27 of The REGENTS' employees and students who are engaged in, oversee, or support those engaged  
28

1 in or overseeing animal research. These invasions have caused, and similar invasions will cause,  
2 great and irreparable injury to those individuals.

3 110. Plaintiff has no adequate remedies at law. It is impossible to ascertain the amount  
4 of compensation which, if Defendants are not restrained, would provide Plaintiff adequate relief.

5 **FOURTH CAUSE OF ACTION**

6 **(Intrusion Into Private Affairs — Common Law)**

7 **(Against UCLA PRIMATE FREEDOM, ALF, ALB and DOES 1-100)**

8 111. Plaintiff hereby incorporates the allegations in paragraphs 1 through 84 as if fully  
9 set forth herein.

10 112. The REGENTS assert this cause of action pursuant to Article I, Section I of the  
11 California Constitution on behalf of its employees and students who are engaged in, oversee, or  
12 support those engaged in or overseeing animal research. These individuals form a well-defined,  
13 easily identifiable group, and there is a well-defined community of interest among the members of  
14 this group in being free from Defendants' intimidating and harassing conduct.

15 113. No individualized proof of damages is required because Plaintiff seeks only  
16 injunctive relief.

17 114. By the conduct described above, Defendants have intentionally intruded upon the  
18 solitude and seclusion of The REGENTS' employees and students who are engaged in, oversee, or  
19 support those engaged in or overseeing animal research.

20 115. These intrusions would be highly offensive to an ordinarily reasonable person.

21 116. The REGENTS are informed and believe, and on that basis allege, that its  
22 employees and students who are engaged in, oversee, or support those engaged in or overseeing  
23 animal research have suffered mental and emotional distress as a result of Defendants' intrusions  
24 and that this distress is of a kind that normally results from such intrusions.

25 117. Defendants, unless and until restrained, will continue to intrude upon the solitude  
26 and seclusion of The REGENTS' employees and students who are engaged in, oversee, or support  
27 those engaged in or overseeing animal research. These intrusions have and will continue to cause  
28 great and irreparable injury.

1 118. Plaintiff has no adequate remedies at law. It is impossible to ascertain the amount  
2 of compensation which, if Defendants are not restrained, would provide Plaintiff adequate relief.

3 **FIFTH CAUSE OF ACTION**

4 **(Trespass - Common Law)**

5 **(Against ALF, ALB and DOES 1-100)**

6 119. Plaintiff hereby incorporates the allegations in paragraphs 1 through 84 as if fully  
7 set forth herein.

8 120. The REGENTS assert this cause of action behalf of its employees and students who  
9 are engaged in, oversee, or support those engaged in or overseeing animal research. These  
10 individuals form a well-defined, easily identifiable group, and there is a well-defined community  
11 of interest among the members of this group in being free from Defendants' intimidating and  
12 harassing conduct.

13 121. At all relevant times, employees and students of The REGENTS were in possession  
14 of certain real property in the County of Los Angeles. On numerous occasions, Defendants ALF,  
15 ALB and DOES 1-100, without the consent or authority and against the will of The REGENTS or  
16 their employees or students, entered onto such real property. Specifically identifying each such  
17 trespass would be needlessly cumulative and voluminous.

18 122. Defendants ALF, ALB and DOES 1-100, unless and until restrained, will continue  
19 to trespass onto and interfere with the use and enjoyment of property in the possession of  
20 employees and students of The REGENTS. These trespasses have caused employees and students  
21 of The REGENTS great and irreparable harm.

22 123. Plaintiff cannot be adequately compensated at law for the injuries its employees  
23 and students have sustained and will continue to sustain as a result of the trespasses committed by  
24 Defendants ALF, ALB and DOES 1-100.

1 **SIXTH CAUSE OF ACTION**

2 **(Intentional Interference With Business Relations - Common Law)**

3 **(Against All Defendants)**

4 124. Plaintiff hereby incorporates the allegations in paragraphs 1 through 84 as if fully  
5 set forth herein.

6 125. Plaintiff The REGENTS asserts this cause of action on its own behalf.

7 126. The REGENTS have a protected and valuable interest in its business relationships  
8 with its employees and students. These relationships provide and will continue to provide  
9 economic benefits to The REGENTS.

10 127. Defendants have specifically directed their unlawful acts of harassment and  
11 intimidation against The REGENTS' employees and students.

12 128. Defendants' goal in harassing and intimidating The REGENTS' employees is to  
13 disrupt the relationships between The REGENTS and its employees and students. These acts of  
14 harassment directed at The REGENTS' employees and students are unlawful and serve no  
15 legitimate purpose.

16 129. The REGENTS are informed and believe, and on that basis allege, that as a result  
17 of Defendants' unlawful acts, The REGENTS' employees have suffered severe anxiety and  
18 distress, negatively affecting the performance of their work-related duties, causing them to miss  
19 days of work due to fear of harassment, and/or causing them to cease performing job duties related  
20 to animal research.

21 130. As a result of Defendants' unlawful acts of harassment and intimidation, The  
22 REGENTS have suffered great and irreparable injury. Unless Defendants are enjoined and  
23 restrained, The REGENTS will continue to suffer great and irreparable injury.

24 131. The REGENTS have no adequate remedy at law. It is impossible to ascertain the  
25 amount of compensation which, if Defendants are not restrained, would provide The REGENTS  
26 adequate relief.

27 **PRAYER FOR RELIEF**

28 WHEREFORE, Plaintiff prays as follows: