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5  
6 SUPERIOR COURT OF CALIFORNIA, COUNTY OF MENDOCINO

7  
8 TEN-MILE BRANCH

9  
10 MARY GEDDRY, ) UNLIMITED  
11 Plaintiff, ) Case No.: SCTM CVPO 02 88145  
12 vs. )  
13 DON IVERSEN, DEE IVERSEN, RON ) **FIRST AMENDED COMPLAINT FOR**  
14 IVERSEN, MARLENE IVERSEN, JOHN ) **NUISANCE; CONVERSION;**  
15 IVERSEN, MARK KALINA and BARBARA ) **NEGLIGENT INFLECTION OF**  
16 KALINA, ) **EMOTIONAL DISTRESS;**  
17 Defendants ) **INTENTIONAL INFLECTION OF**  
 ) **EMOTIONAL DISTRESS; TRESPASS,**  
 ) **ASSAULT AND CONSPIRACY**  
 )

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18  
19 Plaintiffs allege:

- 20 1. Mary Geddry is an individual residing at 41701 Little Lake Road, Mendocino,  
21 California.
- 22 2. Don and Dee Iversen, defendants, are husband and wife. Don is the son of Ron  
23 and Marlane Iversen. Their address is 41565 Little Lake Road, Mendocino, California.
- 24 3. Ron and Marlene Iversen, defendants, are husband and wife. Their address is  
25 41575 Little Lake Road, Mendocino, California. The parcel of land on which they live that is

1 identified by this address is immediately adjacent to Ms. Geddry's to the east. Don and Dee  
2 Iversens' land is immediately adjacent to that of Ron and Marlene Iversen further east from Ms.  
3 Geddry's land.

4 4. Don, Dee, Ron and Marlene Iversen are neighbors to Ms. Geddry.

5 5. John Iversen is an individual residing in Mendocino, California. He is the son of  
6 Ron and Marlene Iversen and brother to Don Iversen.

7 6. Mark Kalina and Barbara Kalina are husband and wife and rent a residence  
8 located at 41751 Little Lake Road, Mendocino, California. This property is adjacent to Mary  
9 Geddry's property on the west side of her land.

10 7. Venue is proper in this Court because all defendants are residents of Mendocino  
11 County.

12 8. Ms. Geddry moved into her home at 41701 Little Lake Road in June 2000.

13 9. In June 2000 Ron, Marlene, Don and Dee lived at the neighboring identified  
14 properties listed above.

15 10. Ms. Geddry moved into 41701 Little Lake Road with her dog Junior.

16 11. As of June 2000 and through June 1, 2002 Ron, Marlene, Don, Dee and John  
17 (collectively "the Iversens") owned two dogs, named Jake and Brutus.

18 12. On January 1, 2001 Ms. Geddry observed that her dog Junior had been in a fight  
19 with another dog or animal. Dee and Marlene Iversen accused Ms. Geddry's dog Junior of  
20 injuring their Dog Brutus that same day.

21 13. On January 2, 2001 Ms. Geddry was informed by Sue Bottom, of Mendocino  
22 Animal Control, that no one actually witnessed a fight between the dogs, knew the location of  
23 the fight or had any idea why the fight started.

1           14.     On January 6, 2001, Ron Iversen came over to Ms. Geddry's home unannounced.  
2 After showing her pictures of Jake's injuries, Ron Iversen demanded that Ms. Geddry "get rid  
3 of" Junior within twenty-four hours or pay the veterinary bill for their dog's injuries.

4           15.     On or about January 11, 2001, Ron Iversen tendered a bill for his dog Brutus'  
5 injuries.

6           16.     The Iversens installed chain link fence on their property, but only on the west and  
7 north sides and a short run down the east side of their property. The Iversens' dogs, Jake and  
8 Brutus, continued to roam the neighborhood freely.

9           17.     On May 2, 2002 the Iversens' dogs entered Ms. Geddry's property from Little  
10 Lake Road. As Brutus approached her house down the driveway, Junior and Brutus got into an  
11 altercation. Junior and Brutus lunged for each other. Ms. Geddry was forced to break up the dog  
12 fight on her property.

13           18.     On June 1, 2002 at approximately 8:15 a.m., Deputy Sheriff Walker visited Ms.  
14 Geddry on her property. Officer Walker informed her that the Iversens' dog, Brutus, had been  
15 killed across the street from Ron Iversen's property on the north side of Little Lake Road and  
16 that allegations had been made that "Junior had been seen in the area."

17           19.     Officer Walker concluded Junior had not been in a dog fight and so informed Ms.  
18 Geddry.

19           20.     Twice during the day of June 1, 2002 Ms. Geddry witnessed Don Iversen's white  
20 Yukon SUV proceeding along the front of her property at a near crawl. Chris, Ms. Geddry's son,  
21 also observed such a slow pass made by Don Iversen's white Chevrolet pick-up truck, a second  
22 vehicle he owns.

23           21.     At approximately 7:00 p.m. on June 1, 2002 Ms. Geddry went into her front yard  
24 with Junior. Junior ran ahead of her towards the front of the yard. Ms. Geddry heard two  
25 enormous gun shots. Stepping around a redwood tree, she witnessed Don Iversen's distinctive

1 white pick-up truck parked on the south shoulder of Little Lake Road in front of her property.  
2 She first heard car door shut and then a dog cry. Don Iversen's pick-up truck pulled away at a  
3 very high speed westbound on Little Lake Road.

4 22. Ms. Geddry called out for her dog Junior. He did not respond or return. In fear  
5 for her life and believing that Don Iversen would at any moment return and shoot her or shoot  
6 onto her property again, Ms. Geddry ran to the house and called 911, describing the shooter's  
7 pick-up truck.

8 23. Ms. Geddry then ran back to find Junior. He had pulled himself, bleeding, into a  
9 clearing. He had been shot twice in the back at close range with a shot gun. He died in Ms.  
10 Geddry's arms.

11 24. Junior was shot on Ms. Geddry's property and from behind. The beginning of the  
12 blood trail left by Junior as crawled from the shooting was on Ms. Geddry's property.

13 25. Don Iversen, upon being pulled over by the California Highway Patrol and the  
14 Sheriff's Department, at first denied shooting Junior. Upon confrontation by Deputy Bushenll  
15 with an inconsistency, Don Iversen confessed to shooting Junior, but presented the false claim of  
16 self-defense prepared with assistance and on behalf of the other defendants.

17 26. Don Iversen stalked and intentionally killed Junior on June 1, 2002. Finding  
18 Junior in the front yard at approximately 7:00 p.m. Don Iversen shot Junior twice with a shotgun  
19 loaded with a lethal dose of .00 buck shot at close range. Don Iversen then fled the scene instead  
20 of explaining his actions, lied and denied involvement, and now claims the shooting was in self-  
21 defense.

22 27. Don Iversen was the owner of the dog known as Brutus, although the dog was  
23 housed and maintained by Ron and Marlene Iversen, with another family pet, Jake.

1           28.     Don Iversen, Dee Iversen, John Iversen, Ron Iversen and Marlene Iversen each  
2 individually and together are responsible for the failure to contain their dogs in that they had  
3 joint actual control over the dogs.

4           29.     On information and belief, Don Iversen, Dee Iversen, John Iversen, Ron Iversen,  
5 Marlene Iversen, Mark Kalina and Barbara Kalina, met and discussed the staged killing of Ms.  
6 Geddry's dog.

7           30.     On information and belief, Don Iversen, Dee Iversen, John Iversen, Ron Iversen,  
8 Marlene Iversen, Mark Kalina and Barbara Kalina decided that Don Iversen would stalk and kill  
9 Junior as the agent for all of the defendants, and that John Iversen would serve as a driver and  
10 accomplice, also acting as an agent for all of the other defendants, and, upon Mark Kalina's  
11 direction and advice, would stage the shooting to appear to be self-defense, if caught, again  
12 acting as agents for all of the defendants.

13           31.     On information and belief, Don Iversen, Dee Iversen, John Iversen, Ron Iversen,  
14 Marlene Iversen, Mark Kalina and Barbara Kalina decided that Mark Kalina, using his position  
15 as Mendocino County Deputy District Attorney, would, acting as the agent for the other  
16 defendants, influence the law enforcement investigation and decision to prosecute the case  
17 through the use of his public office and by reason of his position and contacts.

18           32.     Mendocino County Sheriff Deputies Eric Riboli, John Bushnell, Bradley Walker,  
19 and Donald Miller have all made or reviewed entries into Sheriff's Case Number 1-02-002158,  
20 relating to the shooting of plaintiff's dog by Don Iversen. That report forwards information to  
21 the office of the District Attorney concerning violations by Don Iversen of Penal Code 597(A)  
22 and 347(C), namely, Cruelty to Animals, a felony charge, and shooting a firearm from a public  
23 road, a misdemeanor charge.

24           33.     In the Sheriff's report, Sheriff Deputy John Bushnell indicates that Don Iversen  
25 fled the scene where plaintiff's dog was shot, was found in a white Chevy pick-up truck, driven

1 by John Iversen, and was at first “untruthful” about his role in the shooting. Don Iversen  
2 confessed to John Bushnell that he shot the dog, but then claimed it was done in self-defense.

3 34. In the Sheriff’s report, it is indicated that John Bushnell spoke with Deputy  
4 District Attorney Mark Kalina on June 1, 2002, when investigating the shooting, but failed to  
5 note his conversation in the Sheriff’s report.

6 35. On information and belief, Mark Kalina used his position and influence, acting as  
7 the agent of the other defendants, and in furtherance of the conspiracy herein alleged, to thwart  
8 and limit the investigation and bolster the false claim of Don Iversen that the shooting was done  
9 in self-defense.

10 36. It is also noted in the Sheriff’s report that Mark Kalina, again acting as agent for  
11 all other defendants, contacted John Bushnell on June 3, 2002 and attempted to thwart and limit  
12 the investigation and bolster the false claim of Don Iversen that the shooting was done in self-  
13 defense. Mark Kalina, acting as agent for all defendants, also instructed John Bushnell, or  
14 otherwise influenced him, to ask for consideration of a public nuisance charge against plaintiff in  
15 order to deflect public criticism from his co-conspirators.

16 37. On June 20, 2002, Lieutenant Robert Arbayo of Mendocino Animal Control  
17 forwarded the results of his investigation in the shooting of plaintiff’s dog to the District  
18 Attorney for consideration for prosecution. In that report, Animal Control indicates that Don  
19 Iversen’s claim of self-defense **“is questionable considering that the evidence gathered**  
20 **indicates that the dog was shot on its own property.”** Lieutenant Arbayo also states sufficient  
21 evidence exists to charge Don Iversen and John Iversen with violations of Penal Code section  
22 597(a) and 374c.

23 38. On information and belief, Mark Kalina, acting as agent for all other defendants,  
24 illegally and improperly communicated with District Attorney Norman Vroman to thwart and  
25 limit any investigation into this matter or prosecution for crimes committed. Mark Kalina, acting

1 as agent for all other defendants, and in furtherance of the conspiracy herein alleged, falsely  
2 bolstered Don Iversen's claim of self-defense in his communications with Norman Vroman.

3 39. On information and belief, District Attorney Norman Vroman has failed to  
4 properly investigate or charge Don Iversen or John Iversen for the crimes committed because of  
5 the actions taken by his employee, Mark Kalina, acting as agent for the other defendants.

6  
7 **FIRST CAUSE OF ACTION**

8 **NUISANCE**

9 40. Plaintiff reincorporates and realleges paragraphs one through thirty-nine as if fully  
10 set forth herein.

11 41. At all times mentioned in this complaint, plaintiff, Mary Geddry, was the owner  
12 and possessor of certain real property situated at 41701 Little Lake Road, Mendocino, California,  
13 Assessor's Parcel Number 119-470-4.

14 42. At all times mentioned in this complaint, defendants, Ron, Marlene, Don, Dee and  
15 John Iversen, were the owners, possessors and occupants of real property situated at 41565 Little  
16 Lake Road and 41575 Little Lake Road, Mendocino, California, which property is adjacent to  
17 and in the vicinity of plaintiff's property.

18 43. Plaintiff is informed and believes, and on the basis of this information alleges,  
19 that at all times mentioned in this complaint, defendants were the agents and employees of their  
20 codefendants, and in doing the things alleged in this complaint were acting with the course of  
21 such agency or employment.

22 44. Commencing on or about June 1, 2000, defendants allowed their dogs to roam  
23 from their property freely, without a leash, without supervision and in violation of County law.  
24 Defendants do not have a fence that encloses their property. Their dogs, Brutus and Jake, were  
25 allowed to roam the neighborhood and posed a nuisance under Civil Code section 3479. These

1 dogs pose a threat to plaintiff's health, obstruct her free use of her property, interfere with her  
2 comfortable enjoyment of life and property, and unlawfully obstruct Little Lake Road. This also  
3 constitutes a public nuisance under Civil Code section 3480. Ms. Geddry has extremely young  
4 children who have been and continue to be placed in jeopardy by this nuisance.

5 45. On January 13, 2001 and on numerous occasions thereafter plaintiff gave  
6 defendants notice that these dogs were a private and public nuisance. Plaintiff sent the Iversens a  
7 letter by United States post dated January 13, 2001 requesting the abatement of this nuisance.  
8 Defendants, and each of them, have failed to reply to the letter or otherwise abate the nuisance.  
9 A copy of that letter is attached as Exhibit 1 and is incorporated by reference.

10 46. As a proximate result of the nuisance created and maintained by defendants,  
11 plaintiff has been damaged in the amount \$1,000 for installing additional fencing.

12 47. Plaintiff's property has been diminished in value as a further and proximate result  
13 of the nuisance created by defendants in the amount of \$52,500.00. Unless the nuisance created  
14 by defendants is abated, plaintiff's property will continue to diminish in value.

15 48. As a further and proximate result of the nuisance created by the defendants,  
16 plaintiff has suffered extreme mental anguish and had to be placed under the care of a physician.  
17 Ms. Geddry now suffers and exhibits loss of appetite, sleep deprivation, insomnia, muscle  
18 tension, headaches, nightmares, inflamed asthma and inconceivable grief and fear. Accordingly,  
19 plaintiff has suffered general damages in an amount to be determined by proof at trial.

20 49. Plaintiff is informed and believes, and on the basis of this information and belief  
21 alleges, that unless restrained or enjoined by order of this court, defendants will continue to  
22 engage in and promote the activity constituting the nuisance described herein. Such conduct will  
23 result in irreparable harm to plaintiff in that plaintiff fears the entry of the remaining dog on her  
24 property and further violence between neighbors. The threat of such irreparable and permanent  
25

1 damage justifies the issuance by this court of an injunction, as well as an award of money  
2 damages, as expressly authorized in Code of Civil Procedure sections 526 and 731.

3 50. Plaintiff has no adequate remedy at law for the injuries which plaintiff has  
4 suffered and will continue to suffer.

5  
6 **SECOND CAUSE OF ACTION**

7 **CONVERSION**

8 51. Plaintiff reincorporates and realleges paragraphs one through thirty-nine as if fully  
9 set forth herein.

10 52. At all times herein mentioned, and in particular on June 1, 2002, plaintiff was the  
11 rightful owner and entitled to possession of a Staffordshire Terrier dog, named Junior.

12 53. On June 1, 2002, the above-mentioned property had a value of \$1,000.

13 54. On June 1, 2002, defendant Don Iversen, acting as the agent for all of the other  
14 defendants, intentionally and willfully shot and killed Junior, removing the above-mentioned  
15 property from plaintiff's possession..

16 55. On June 1, 2002, as a proximate and direct result of defendant's conversion,  
17 plaintiff suffered the loss of her dog and costs associated with the conversion.

18 56. The aforementioned acts of defendants were willful, wanton, malicious, and  
19 oppressive, were undertaken with the intent to defraud, and justify the awarding of exemplary  
20 and punitive damages.

21  
22 **THIRD CAUSE OF ACTION**

23 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

24 57. Plaintiff reincorporates and realleges paragraphs one through thirty-nine as if fully  
25 set forth herein.

1           58. Plaintiff and defendants are neighbors and have been neighbors for approximately  
2 two years in Mendocino, California. Defendants owed plaintiff a duty of care not to inflict  
3 emotional distress upon her. Defendants are required to behave in a manner expected of citizens  
4 of a civil, safe society.

5           59. Defendants knew and should have known that failure to exercise due care in the  
6 performance of firing a shotgun near and onto plaintiff's property for the purpose of killing or  
7 wounding Junior would cause plaintiff severe emotional distress.

8           60. Defendants breached their duty of care in having Don Iversen, acting as their  
9 agent, kill Junior.

10           61. Defendants breached their duty of care because Don Iversen, acting as their agent,  
11 discharged a shotgun from a public highway, and/or plaintiff's property and/or their property  
12 onto plaintiff's property.

13           62. Defendants breached their duty of care because their agent Don Iversen fled the  
14 scene of the shooting.

15           63. Defendants breached their duty of care in that their agent Don Iversen lied to  
16 plaintiff and the Sheriff about the nature of the shooting and in concocting a story to hide his true  
17 actions and the conspiracy under which he operated as agent for all defendants.

18           64. As a proximate result of each one of actions by defendants, including those taken  
19 by Don Iversen, acting as the agent for defendants, identified in this cause of action, as well as  
20 the result of the cumulative effect of one or more of these actions, plaintiff has suffered severe  
21 emotional distress, requiring medical attention and placing plaintiff under the care of a physician  
22 and manifesting itself in many physical symptoms. Ms. Geddry now suffers and exhibits loss of  
23 appetite, sleep deprivation, insomnia, muscle tension, headaches, nightmares, inflamed asthma  
24 and inconceivable grief and fear.

1 **FOURTH CAUSE OF ACTION**

2 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

3 65. Plaintiff reincorporates and realleges paragraphs one through thirty-nine as if fully  
4 set forth herein.

5 66. Plaintiff and defendants are neighbors and have been neighbors for approximately  
6 two years in Mendocino, California. Defendants owed plaintiff a duty of care not to inflict  
7 emotional distress upon her. Defendants are required to behave in a manner expected of citizens  
8 of a civil, safe society.

9 67. Defendants knew and should have known that failure to exercise due care by  
10 having their agent Don Iversen fire a shotgun near and onto plaintiff's property for the purpose  
11 of killing or wounding Junior would cause plaintiff severe emotional distress.

12 68. Defendants intentionally and willfully killed Junior through their agent Don  
13 Iversen by way of a painful series of shotgun blasts in order to take vengeance on Junior for  
14 allegedly killing their dog and to intimidate, harass, frighten and punish plaintiff for the same.

15 69. Defendants intentionally and willfully fired a shotgun onto property owned by  
16 plaintiff in order to intimidate, harass, frighten and punish plaintiff for the alleged killing of their  
17 dog.

18 70. As a direct and proximate result of defendants' conduct, plaintiff was placed in  
19 fear for her life.

20 71. As a direct and proximate result of defendants' conduct, Junior was killed,  
21 crawling across plaintiff's property only to die in her arms.

22 72. As a further proximate result of defendant's firing of the shotgun onto her  
23 property and killing of Junior, plaintiff suffered severe humiliation, mental anguish and  
24 emotional and physical distress, and has been injured in mind and body. Ms. Geddry now  
25

1 suffers and exhibits loss of appetite, sleep deprivation, insomnia, muscle tension, headaches,  
2 nightmares, inflamed asthma and inconceivable grief and fear.

3  
4 **FIFTH CAUSE OF ACTION**

5 **TRESPASS TO LAND**

6 73. Plaintiff reincorporates and realleges paragraphs one through thirty-nine as if fully  
7 set forth herein.

8 74. On June 1, 2002, plaintiff was in possession of certain real property situated at  
9 41701 Little Lake Road, Mendocino, California, Assessor's Parcel Number: 119-470-4.

10 75. On June 1, 2002, plaintiff used this property for her residence.

11 76. On June 1, 2002, defendants, without the consent or authority and against the will  
12 of plaintiff, by their agent Don Iversen, entered onto plaintiff's property by crossing the northern  
13 boundary of the property where her property meets Little Lake Road in order to discharge two  
14 shells from a shotgun into plaintiff's dog, Junior, and across and into her front yard. Buckshot  
15 from the discharge of this weapon was left in plaintiff's dead dog and scattered across her front  
16 yard.

17 77. The effect of defendants' trespass was the death of Junior, the conversion of her  
18 dog, and the resulting pain, suffering and mental anguish associated with this wrong.

19 78. Plaintiff now lives in fear that defendants will again trespass on her land or  
20 discharge a weapon onto or across her land. She resides there with five children, two of whom  
21 are less than ten years of age.

22 79. Defendants acted with fraud, malice and oppression, believing that Junior had  
23 killed their dog, and intended to trespass for the purpose of committing numerous civil and  
24 criminal infractions and for the very purpose of inflicting fear, terror and anguish upon plaintiff.  
25 Punitive and exemplary damages are therefore appropriate.



1 **SEVENTH CAUSE OF ACTION**

2 **CONSPIRACY**

3 87. Defendants conspired together to plan and implement each of the above causes of  
4 action against plaintiff. Defendants are family and neighbors and all reside in close physical  
5 proximity.

6 88. Defendants alleged and believed that plaintiff's dog killed Brutus and constituted  
7 a threat to Mark and Barbara Kalina. Defendants were not informed by the Sheriff's Department  
8 that the investigation into the alleged incidents reported by Mark Kalina to Animal Control and  
9 the alleged killing of Brutus by Junior cleared Junior and plaintiff of any wrongdoing.

10 89. On information and belief, plaintiff alleges that defendants nevertheless realized  
11 that there was little chance of action by any governmental authority against plaintiff. Because of  
12 their rage and misdirected anger, defendants conspired to terrorize, punish, assault, defame and  
13 inflict fear upon plaintiff by discharging a weapon onto her property and brutally killing her dog.

14 90. On information and belief, Mark and Barbara Kalina incorrectly believed that  
15 plaintiff's dog posed a threat to them and had attempted to have Mendocino County Animal  
16 Control find the dog "potentially dangerous" or "vicious." On information and belief,  
17 defendants Mark and Barbara Kalina communicated this fear to the other defendants, instructed  
18 them on how to make the shooting appear to be legal self-defense, and otherwise participated in  
19 the planning of the shooting of Junior.

20 91. On information and belief, plaintiff alleges that all of the defendants met together  
21 and developed a plan whereby Junior would be shot and killed in a manner that appeared to be  
22 justified as self-defense. On information and belief, defendant Mark Kalina, acting as agent for  
23 all defendants, further indicated that he would use his governmental position to reduce, minimize  
24 or end any law enforcement or district attorney inquiry into the planned shooting of Junior.

1           92.     On information and belief, plaintiff alleges that defendants, through their agents  
2 Don Iversen and John Iversen, stalked her dog by a series of slow driving passes along the public  
3 road during the day of June 1, 2002. Upon seeing Junior in the front yard of plaintiff's property  
4 with plaintiff, defendants, through their agents Don Iversen and John Iversen, exacted their brutal  
5 revenge for an alleged and unproven wrongs by firing two shotgun blasts at close range into and  
6 across plaintiff's property, killing Junior.

7           93.     Plaintiff has been informed by the Mendocino County Sheriff that Don Iversen  
8 has admitted and confessed to being the shooter and trigger-man. Because of the conspiracy,  
9 each defendant is responsible and a joint tortfeasor, subject to joint and several liability.

10  
11           WHEREFORE, Plaintiff demands judgment as follows:

- 12           a. For judgment for the conversion of Junior by his intentional killing in the amount of  
13           \$1,000 for cost of replacement or such other amount as may be ascertained at trial;
- 14           b. For judgment for the conversion of Junior and the proximate and foreseeable loss  
15           resulting from defendants' conversion ;
- 16           c. For general damages for severe emotional distress and mental suffering, including  
17           damages resulting from defendants' conversion and/or killing of Junior in that it  
18           caused loss of companionship, mental anguish and pain and suffering at the loss of  
19           Junior ;
- 20           d. For medical and related expenses according to proof;
- 21           e. For other general damages in an amount to be proven at trial;
- 22           f. Compensatory damages for defamation according to proof;
- 23           g. Punitive damages for intentional trespass;
- 24           h. For costs of suit herein incurred;
- 25

- 1 i. For an injunction abating the nuisance of defendants allowing their remaining dog to  
2 roam free and off leash;
- 3 j. For punitive damages in the amount necessary to make an example and deter others  
4 from outrageous and obscene infliction of emotional distress; and
- 5 k. For such other relief as the court considers just and proper.
- 6

7 Dated this 18<sup>th</sup> day of July, 2002

8 By: \_\_\_\_\_  
9 45121 Ukiah St.  
10 P.O. Box 2402  
11 Mendocino, CA 95460  
12 707-937-0820 / FAX 707-  
937-0834  
Andrew S. Mansfield (SB  
No. 174556)

13 VERIFICATION

14 I, Mary Geddry, am plaintiff in the above-entitled action. I have read the foregoing Complaint  
15 and know the contents thereof. The same is true of my own knowledge, except as to those  
16 matters which are therein alleged on information and belief, and as to those matters, I believe it  
17 to be true.

18 I declare under penalty of perjury that the foregoing is true and correct and that this declaration  
19 was executed in Mendocino, California on \_\_\_\_\_.

20 \_\_\_\_\_  
21 Mary Geddry  
22  
23  
24  
25