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12 Attorneys for Plaintiff
13 Los Angeles Emergency Preparedness
14 Foundation dba Community Brigade

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**

17 LOS ANGELES EMERGENCY
18 PREPAREDNESS FOUNDATION
19 dba COMMUNITY BRIGADE, a
20 California nonprofit corporation,

21 Plaintiff,

22 v.

23 MIKKE PIERSON, an individual;
24 JASON DAX MILLER aka DAX
25 MILLER, an individual; DANA
26 WOLF PHILLIPS, an individual;
27 KEEGAN GIBBS, an individual;
28 TYLER HAUPTMAN, an individual;
COMMUNITY BRIGADE, a
California nonprofit corporation; and
DOES 1 through 50, inclusive,

Defendants.

Case No.:
Assigned to:

COMPLAINT FOR:

- (1) TRADEMARK INFRINGEMENT – VIOLATION OF 15 U.S.C. § 1114**
- (2) FALSE DESIGNATION OF ORIGIN/ADVERTISING – VIOLATION OF 15 U.S.C. 1125(a)**
- (3) COMMON LAW TRADEMARK INFRINGEMENT**
- (4) COMPUTER CRIMES [CAL. PENAL CODE § 502]**
- (5) CONVERSION**
- (6) CIVIL THEFT [CAL. PENAL CODE § 496]**
- (7) BREACH OF CONTRACT**
- (8) VIOLATION OF CAL. BUS. & PROF. CODE §§ 17200, ET SEQ.**
- (9) DECLARATORY RELIEF**

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1 COMES NOW Plaintiff Los Angeles Emergency Preparedness Foundation dba
2 Community Brigade (“Plaintiff” or “LAEPF”) in its complaint against Mikke Pierson
3 (“Defendant Pierson”); Jason Dax Miller aka Dax Miller (“Defendant Miller”); Dana
4 Wolf Phillips (“Defendant Phillips”); Keegan Gibbs (“Defendant Gibbs”); Tyler
5 Hauptman (“Defendant Hauptman”); Community Brigade (“Imposter Entity”); and
6 DOES 1 through 50, inclusive (collectively, “Defendants”), and alleges as follows:
7

8 **I. NATURE OF THE CASE**

9 1. Plaintiff is a charitable organization that created a program, known as the
10 LAEPF “Community Brigade”. The Community Brigade is an all-hazards volunteer
11 response program that supports the Los Angeles County Fire Department’s pilot
12 communities, with a primary emphasis on wildfire preparedness, prevention, and
13 community resilience. LAEPF obtained trademarks and a ‘dba’ for the Community
14 Brigade name, obtained approval from the County for its operations as part of a
15 ‘Community Brigade Pilot Program’, solicited and received significant donations from
16 members of the community, assisted during major fire events (as featured in various
17 media reporting), and LAEPF has at all times operated in full compliance with the law as
18 a registered non-profit for the benefit of the public.

19 2. The individual defendants volunteered for and were involved in the LAEPF
20 Community Brigade program. Written volunteer agreements were signed by several of
21 the individual defendants, including Defendants Gibbs, Pierson, and Hauptman. These
22 agreements clearly specified that the individuals were volunteering for the “Community
23 Brigade Program with the Los Angeles Emergency Preparedness Foundation, in
24 partnership with the Fire Department”. The individual defendants’ volunteer and other
25 relationships with LAEPF provided the individual defendants significant access to
26 LAEPF’s accounts and operations.

27 3. Any access obtained by individual defendants to LAEPF’s systems,
28 accounts, materials, volunteers, and operational information occurred solely as a result of



1 their participation in the LAEPF Community Brigade program and the trust placed in
2 them by LAEPF. The individual defendants were granted such access only for the
3 purpose of supporting LAEPF’s charitable program and not for any independent or
4 personal use.

5 4. Defendants have engaged in ‘charity fraud’ and are engaged in an ongoing
6 attempt to claim for their own interests the property and operations of LAEPF. On
7 September 2, 2025, Defendants registered an imposter entity utilizing a name identical to
8 LAEPF’s trademarked name and registered dba “Community Brigade.”

9 5. Defendants have cancelled or changed permissions to block LAEPF from
10 access to various computer systems and services, including relating to LAEPF’s
11 Community Brigade website, software programs such as ‘Spectora’, and otherwise.
12 Digital files belonging to LAEPF, including templates and login information are
13 presently in Defendants’ control and have not been released or provided to LAEPF’s
14 control.

15 6. Defendants have falsely represented to media and to other third parties that
16 the Imposter Entity is *the* ‘Community Brigade’. These representations include
17 Defendants taking credit for actions that were performed by LAEPF under the name
18 Community Brigade, including actions that occurred prior to the Imposter Entity’s
19 creation in late 2025. It is unambiguous and not subject to dispute that Defendants are
20 attempting to convince Californians that the Imposter Entity is the same organization as
21 LAEPF’s Community Brigade.

22 7. Defendants have solicited and received donations under the name
23 ‘Community Brigade’. In addition to falsely representing themselves to be the LAEPF
24 Community Brigade, Defendants have opened a bank account at the same banking
25 institution as LAEPF under the name “Community Brigade” to maximize the confusion
26 of the public and to obtain donations in the Community Brigade name.

27 8. Defendants have demanded that Plaintiff turn over all the assets in LAEPF’s
28 control that are associated with LAEPF’s Community Brigade program.

1 Court has supplemental jurisdiction over the claims alleged under state law pursuant to
2 28 U.S.C. § 1367(a) because the state law claims are so related to the federal claims that
3 they form part of the same case or controversy and derive from the same operative facts
4 and circumstances.

5 12. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this Court because the
6 acts and omissions that which gave rise to this lawsuit occurred in Los Angeles,
7 California (Central District of California, Western Division).

8
9 **III. PARTIES**

10 13. Plaintiff LAEPF is a California nonprofit corporation operating in the State
11 of California, County of Los Angeles.

12 14. Plaintiff is informed, believes, and based thereon alleges that Defendant
13 Pierson is an individual residing in the State of California, County of Los Angeles.

14 15. Plaintiff is informed, believes, and based thereon alleges that Defendant
15 Miller is an individual residing in the State of California, County of Los Angeles.

16 16. Plaintiff is informed, believes, and based thereon alleges that Defendant
17 Phillips is an individual residing in the State of California, County of Los Angeles.

18 17. Plaintiff is informed, believes, and based thereon alleges that Defendant
19 Gibbs is an individual residing in the State of California, County of Ventura.

20 18. Plaintiff is informed, believes, and based thereon alleges that Defendant
21 Hauptman is an individual residing in the State of California, County of Los Angeles.

22 19. Plaintiff is informed, believes, and based thereon alleges that the Imposter
23 Entity is a recently incorporated California corporation, that was incorporated on
24 September 2, 2025, and has recently received a non-profit designation, which is doing
25 business in the State of California, County of Los Angeles (entity no. B20250281731).

26
27 **IV. LAEPF AND THE COMMUNITY BRIGADE**

28 20. LAEPF is a public service entity, which concentrates on preparedness and

1 response for disasters such as wildfires, floods, and earthquakes, offering volunteer
2 services to assist the local governmental agencies in providing relief to the public.

3 21. LAEPF was founded more than 18 years ago to bridge the gap between
4 government emergency response capacity and organized private-sector and community
5 support. Since 2008, LAEPF has been a tax-exempt nonprofit corporation under section
6 501(c)(3) of the Internal Revenue Code.

7 22. From its inception, LAEPF’s mission has been to create partnerships,
8 provide resources, share knowledge, design and implement programs to enhance
9 community resilience and effectively support official disaster response efforts.

10 23. LAEPF was established to ensure that community support enhances rather
11 than interferes with professional emergency operations.

12 24. Over the course of many years, LAEPF developed trusted working
13 relationships with the Los Angeles County Fire Department (“LACoFD”) and other
14 government agencies.

15 25. These relationships were built through operational coordination, compliance
16 with agency requirements, and consistent adherence to safety protocols.

17 26. The authority of LAEPF’s programs derives from these long-standing and
18 formally recognized partnerships.

19 27. The ability of LAEPF to assess community needs and develop revolutionary
20 programs with high-value community benefit requires a level of expertise and persistence
21 that is rare.

22 28. The LAEPF board operates on a pro bono basis without expectation of
23 compensation for their participation on the board. Programs created by LAEPF are
24 purposefully designed to be innovative, collaborative, sustainable, measurable and
25 repeatable.

26 29. LAEPF has supported community response efforts during major incidents,
27 including the 2015 San Bernardino terrorist attack and the May 2018 Aliso Viejo
28 bombing in coordination with the FBI, as well as significant wildfire responses such as

1 the 2017 Creek Fire, the 2017 Skirball Fire, and the 2018 Woolsey Fire.

2 30. These incidents demonstrated both the need for organized civilian support
3 and the risks posed by uncoordinated or unauthorized volunteer activity in active disaster
4 zones.

5 31. In May of 2021, LAEPF formally established the Community Brigade as an
6 official program of LAEPF.

7 32. The Community Brigade exists exclusively as a program of LAEPF and has
8 never operated as an independent entity. The Community Brigade functions as a
9 structured and governed program, not as an informal or independent volunteer group.
10 The Community Brigade was developed, structured, governed, and operated solely by
11 LAEPF. The Community Brigade operates under LAEPF’s governance, policies, and
12 participation agreements with LACoFD.

13 33. As early as June of 2021, LAEPF began using the “Community Brigade”
14 mark and tradename with its volunteers and the LA County Fire Department. LAEPF
15 purchased the domains <https://www.communitybrigade.org> and
16 <https://www.communitybrigade.com>, and began using the “Community Brigade”
17 tradename and mark in commerce.

18 34. LAEPF has held many press conferences using the name “Community
19 Brigade,” been televised using the same name numerous times, and been in discussions to
20 expand the “Community Brigade” concept and name across several local jurisdictions.
21 Numerous articles from publications like the Los Angeles Times, and smaller community
22 publications, refer to and confirm “Community Brigade” as being owned by LAEPF.

23 35. Members of the public, the Los Angeles County Fire Department, various
24 volunteers, and the press have become used to the name Community Brigade and have
25 come to know this name as being part of LAEPF.

26 36. LAEPF was approved by the County Board of Supervisors on October 17,
27 2023, to enter into a Memorandum of Agreement with the LACoFD. This agreement
28 authorizes only LAEPF’s Community Brigade to operate in coordination with the

1 Department. LAEPF’s Community Brigade enjoys credibility and the permission to
2 provide community services in disaster zones based on the agreements it holds with the
3 relevant governmental agencies.

4 37. As LAEPF’s Community Brigade program has grown, LAEPF has expanded
5 its formal association with the Community Brigade name. LAEPF has held a fictitious
6 business name registration for “Community Brigade” in Los Angeles County since
7 March 7, 2025 (Document No. 2025047276). On July 2, 2025, LAEPF filed an
8 application with the United States Patent and Trademark Office (“USPTO”) to register
9 the “Community Brigade” mark. As of January 20, 2026, LAEPF’s owns the trademark,
10 “Community Brigade,” which is registered with the under the registration numbers
11 8112456, 8112457, and 8112458. LAEPF also owns the “L.A. County Fire Dept.
12 Community Brigade” logo, which is pending registration with the USPTO under the
13 serial numbers 99558495, 99558500, and 99558505.

14 38. To the extent any individual defendant participated in the development,
15 refinement, documentation, or implementation of materials associated with the
16 Community Brigade name, logo, or branding, any such work was performed solely in
17 connection with services provided to LAEPF and for the benefit of LAEPF’s Community
18 Brigade program. Such materials constituted work product created for LAEPF, and no
19 individual defendant acquired any ownership or proprietary interest in the Community
20 Brigade name, logo, brand assets, or related materials by virtue of such participation.

21 39. Participation in the Community Brigade requires volunteers to execute
22 formal participation agreements and adhere to a defined code of conduct.

23 40. Community Brigade volunteers are trained within approved operational
24 frameworks designed to protect public safety and ensure coordination with official
25 agencies.

26 41. The integrity of LAEPF’s Community Brigade structure is essential to
27 maintaining operational safety in disaster response environments. Unauthorized or
28 uncoordinated use of the Community Brigade name risks creating confusion,

1 undermining public trust, and jeopardizing established government partnerships.

2 42. The success and growth of the Community Brigade program has been made
3 possible through the contributions of numerous volunteers and participants over time.
4 However, participation in, leadership within, or operational support of the Community
5 Brigade program does not confer ownership or proprietary rights in the program, its
6 name, its goodwill, or its associated assets. At all relevant times, the Community Brigade
7 program of LAEPF operating under LAEPF’s governance, authority, and legal structure.

8 43. At no point have Defendants Pierson or Gibbs owned the Community
9 Brigade. At no point have Defendants Pierson or Gibbs managed any aspect of the
10 Community Brigade separate and apart from certain leadership privileges specifically
11 conferred on them by LAEPF.

12 44. At no point have Defendants Miller, Hauptman, or Phillips owned the
13 Community Brigade. At no point have Defendants Miller, Hauptman, or Phillips
14 managed any aspect of the Community Brigade separate and apart from certain
15 leadership privileges specifically conferred on them by LAEPF.

16 45. At no point has the Community Brigade program been a separate and
17 distinct entity from LAEPF.

18 46. On or about September 2, 2025, those individuals (including Defendant
19 Pierson [CEO of Imposter Entity], Defendant Miller [CFO of Imposter Entity], and
20 Defendant Phillips [Secretary of Imposter Entity]) are believed to have incorporated an
21 entity called “Community Brigade” in California.

22 47. Since at least late-2025, Defendants Pierson, Miller, Phillips, Hauptman, and
23 Gibbs have falsely and fraudulent represented to the general public that they have
24 assumed control of Community Brigade and have implied to third parties this was done
25 with the full approval of LAEPF and the Los Angeles County Fire Department.

26 48. At no point has the Los Angeles County Fire Department issued any kind of
27 approval to, or entered into any kind of agreement with, the Defendants to operate the
28 Community Brigade separate and apart from the LAEPF’s Community Brigade.

1 49. On February 5, 2026, the Imposter Entity filed a Fictitious Business Name
2 registration for the name “Community Brigade” with the Los Angeles County Registrar-
3 Recorder/County Clerk (“LA County Clerk”) (FBN filing no. 2026027353) although the
4 Defendants knew that fictitious name had already been filed by LAEPF.

5 50. An online search of the tradename “Community Brigade” LA County
6 Clerk’s FBN search website shows both LAEPF’s lawful FBN registration on March 7,
7 2025 (Document No. 2025047276), and Imposter Entity’s recent duplicate registration
8 nearly a year later on February 5, 2026 (Document No. 2026027353).

9 51. LAEPF is and has always been the sole owner of the “Community Brigade”
10 tradename and trademarks. LAEPF never authorized Defendants to incorporate a new
11 entity under the “Community Brigade” tradename or take any action under the name
12 “Community Brigade” without LAEPF’s express approval. Nor did LAEPF ever
13 authorize Defendants to use its trademarked logo.

14 52. Despite this, LAEPF is informed and believes that Defendants are actively
15 soliciting donations intended for the LAEPF Community Brigade under Defendants’
16 misrepresentation that the Imposter Entity and LAEPF’s Community Brigade are one and
17 the same.

18 53. LAEPF received a document indicating that the Imposter Entity, and
19 Defendants Pierson, Miller, and Phillips, established a bank account at LAEPF’s bank to
20 potentially divert donations from LAEPF. LAEPF has no association with this bank
21 account. Defendant Phillips sent this document to LAEPF’s executive administrator. On
22 the document’s face, the Imposter Entity, and Defendants Pierson, Miller, and Phillips
23 have copied and pasted LAEPF’s Community Brigade logo while removing LA County
24 Fire Department.

25 54. LAEPF is informed, believes, and based thereon alleges that Defendants
26 have made numerous demands to LAEPF’s board members for LAEPF to “hand over” its
27 assets and ownership of the Community Brigade. However, LAEPF is the sole owner of
28 its money and physical assets, including its equipment and vehicles. LAEPF, not

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1 Defendants, have maintained and insured its assets—assets that were donated to LAEPF.
 2 Those assets include PPE, fire/disaster-relief equipment, and motor vehicles legally
 3 owned by LAEPF.

4 55. To the extent that Defendants have been operating any rogue training
 5 programs or events under the Imposter Entity, those training programs have not been
 6 sanctioned by LAEPF or the LA County Fire Department.

7
 8 **V. CAUSES OF ACTION**

9 **FIRST CAUSE OF ACTION**

10 **TRADEMARK INFRINGEMENT – VIOLATION OF 15 U.S.C. § 1114**

11 (By Plaintiff against Imposter Entity, and DOES 1 through 50)

12 56. Plaintiff incorporates all preceding paragraphs.

13 57. LAEPF maintains registered trademarks in the Community Brigade name,
 14 and has pending applications in the Community Brigade logo.

15 58. LAEPF’s trademarks are summarized in the following table:

Mark	Registration No.	Class
Community Brigade	8112456	CLASS 35: Administration of a program to promote community service; Charitable services, namely, organizing and conducting volunteer programs and community service projects; Charitable services, namely, organizing and conducting volunteer programs aimed at training members of the public in disaster preparedness, aiding disaster response services in the midst of disaster, and disaster recovery; Charitable services, namely, providing a free online resource in the nature of a website for connecting people who have service needs with people who are willing to provide volunteer services; Charitable services, namely, organizing youth groups to undertake charitable projects in the field of disaster response
Community Brigade	8112457	CLASS 41: Leadership development training in the field of disaster preparedness, augmenting the capabilities of disaster response services, and disaster recovery; Providing training for certification in the field of disaster preparedness,

		assisting disaster response services, and disaster recovery; Charitable services, namely, providing training in the field of disaster preparedness, assisting disaster response services, and disaster recovery; Arranging and conducting of training workshops in the field of disaster preparedness, assisting disaster response services, and disaster recovery; Educational services, namely, providing training of volunteers for certification in the field of disaster preparedness, assisting disaster response services, and disaster recovery
Community Brigade	8112458	CLASS 45: Safety inspection services for commercial buildings; Safety inspection services for residential properties; Fire-fighting services

Mark	Serial No.	Class
	99558495	CLASS 35: Administration of a program to promote community service; Charitable services, namely, organizing and conducting volunteer programs and community service projects; Charitable services, namely, organizing and conducting volunteer programs aimed at training members of the public in disaster preparedness, aiding disaster response services in the midst of disaster, and disaster recovery; Charitable services, namely, providing a free online resource in the nature of a website for connecting people who have service needs with people who are willing to provide volunteer services; Charitable services, namely, organizing youth groups to undertake charitable projects in the field of disaster response
	99558500	CLASS 41: Leadership development training in the field of disaster preparedness, augmenting the capabilities of disaster response services, and disaster recovery; Providing training for certification in the field of disaster preparedness, assisting disaster response services, and disaster recovery; Charitable services, namely, providing training in the field of disaster preparedness, assisting disaster response services, and disaster recovery; Arranging and conducting of training workshops in the field of disaster preparedness, assisting disaster response services, and disaster recovery; Educational services, namely, providing training of volunteers for certification in the field of

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1		disaster preparedness, assisting disaster response services, and disaster recovery
2 3 4 5 6	99558505	CLASS 45: Safety inspection services for commercial buildings; Safety inspection services for residential properties; Fire-fighting services



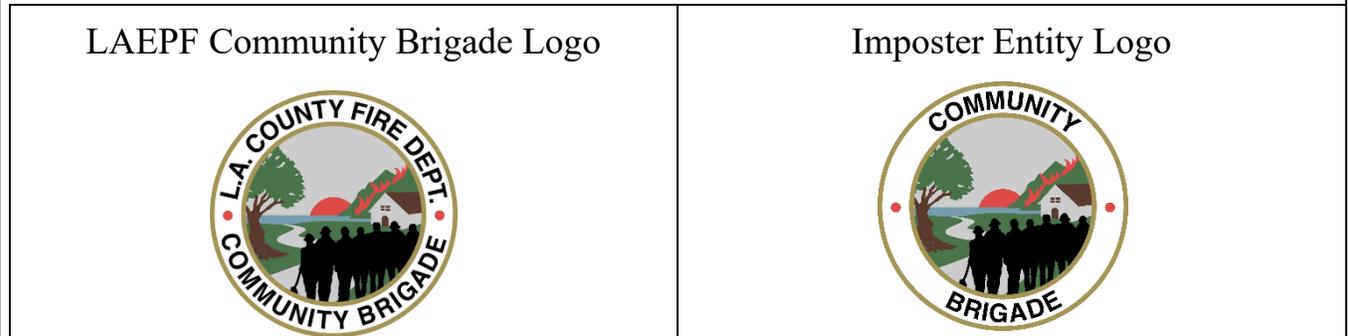
7 59. The LA County community, the public at large, LAEPF’s Community
8 Brigade volunteers, and the LA County Fire Department have associated the Community
9 Brigade mark with LAEPF’s Community Brigade.

10 60. The Imposter Entity’s use of the trademarked materials, listed above, are in
11 an identical context and market to the use of the trademarked materials by Plaintiff
12 LAEPF. Indeed, Defendants have presented these materials in order to mimic as closely
13 as possible the presentation of LAEPF’s organization, and to maximize the potential for
14 misattribution and confusion (which is Defendants’ intent).

15 61. As an example of the Defendants’ misuse of the trademarked materials,
16 Defendants presently maintain a website at “www.CommunityBrigadess.org”. The letter
17 ‘s’ in that URL is emphasized in order to make it more obvious the minor difference
18 between Defendant” recently created website and Plaintiff’s website,
19 “www.CommunityBrigade.org”. On that website, the overall style of the website is the
20 same (including a top bar that tracks down with the content as the user scrolls). The
21 initial text on the website is literally identical between the two websites, using verbatim
22 the same sentence: “We empower our community to prepare for, support during, and
23 recover from wildfire and other disasters.” The Imposter Entity’s website includes the
24 text “Featured in the PBS ‘Weathered’ documentary about the recent LA fires” and
25 includes a YouTube video of that documentary under that text. The documentary in
26 question was created before the Imposter Entity was even registered, and relates to work
27 performed by LAEPF through LAEPF’s Community Brigade. The video and attribution
28 clearly reflect the Defendants’ efforts to falsely suggest to the public that the Imposter

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1 Entity is the Community Brigade being discussed in the video, though that is impossible
 2 as the Imposter Entity did not exist at that time. Both websites use the identical ‘fire’
 3 graphic behind the sign-up link, as the Defendants have simply copied and used LAEPF’s
 4 own content and design to maximize confusion. Also notable is that the Imposter Entity
 5 has chosen to head its website with a logo, in the same position as the LAEPF’s
 6 Community Brigade website, with a logo that looks essentially identical. That logo is
 7 clearly copy and pasted from LAEPF’s Community Brigade logo. Indeed, the filename
 8 of the Imposter Entity’s logo is “Brigade+Round+no+County+copy”, indicating that the
 9 logo is a copy that simply removed the language identifying the association with the LA
 10 County Fire Department. The two logos, screenshotted from each entities website as of
 11 February 27, 2026 are included immediately below, side-by-side:



19 62. The Imposter Entity, without consent or authorization from Plaintiff, have
 20 formed a corporation under the name “Community Brigade”; applied for tax exempt
 21 status; wrongfully filed a fictitious business name registration with the Los Angeles
 22 County Registrar-Recorder/County Clerk; solicited donations and entered into (or
 23 attempted to enter into) agreements with third parties under the name “Community
 24 Brigade”; and represented to LAEPF’s volunteers that the Imposter Entity owns the
 25 “Community Brigade” tradename.

26 63. The Imposter Entity’s use of the “Community Brigade” mark is likely to
 27 cause confusion, cause mistake, and deceive the public, the Community Brigade
 28 volunteers, and the government entities with whom LAEPF contracts.

1 64. LAEPF has continuously used its “Community Brigade” mark with the Los
2 Angeles County community since at least October of 2023. LAEPF has continuously
3 used its mark with LAEPF volunteers and the LA County Fire Department since at least
4 June of 2021. LAEPF’s use of its mark predates the Imposter Entity’s use.

5 65. Defendants have actual knowledge that LAEPF’s use of LAEPF’s
6 “Community Brigade” mark predates their claimed use.

7 66. Imposter Entity’s unauthorized use of the “Community Brigade” mark in
8 commerce is likely to deceive the LA County community, LAEPF’s Community Brigade
9 volunteers, and the LA County Fire Department as to the origin, source, sponsorship, or
10 affiliation of LAEPF’s services bearing the “Community Brigade” mark, and is likely to
11 cause the LA County community, LAEPF’s Community Brigade volunteers, and the LA
12 County Fire Department, that LAEPF’s services bearing the “Community Brigade” mark
13 are authorized, endorsed, or sponsored by the Imposter Entity, or that the Imposter Entity
14 is in some way affiliated with LAEPF.

15 67. In addition, Imposter Entity’s unauthorized use of the “Community Brigade”
16 mark in commerce is likely to deceive the LA County community, LAEPF’s Community
17 Brigade volunteers, and the LA County Fire Department as to the receiving entity for
18 donations to the Community Brigade.

19 68. Additionally, Defendants’ use of the Community Brigade name may give
20 them access to disaster zones, and prohibited spaces, where LAEPF’s Community
21 Brigade members are allowed to perform. Accordingly, Defendants’ conduct is likely to
22 cause serious injuries to members of the public who erroneously believe the Imposter
23 Entity’s acts committed by its agents or representatives are genuine Community Brigade
24 acts.

25 69. The Imposter Entity has infringed on LAEPF’s “Community Brigade” mark
26 with full knowledge of LAEPF’s prior rights and with the willful intent to cause
27 confusion on LAEPF’s goodwill.

28 70. The Imposter Entity’s conduct, including the fact that it has falsified its

1 identity to comport with LAEPF’s genuine Community Brigade identity, has and will
2 cause immediate and irreparable harm to LAEPF, including harm to its goodwill and
3 reputation in the Los Angeles community at large. The Imposter Entity’s conduct will
4 continue to confuse the LA County community, LAEPF’s genuine Community Brigade
5 volunteers, and the LA County Fire Department unless permanently enjoined by this
6 Court. LAEPF believes and based thereon alleges that at the next natural disaster site
7 where genuine Community Brigade members are mixed with Defendants’ fake
8 Community Brigade members, the result will be havoc, confusion, and possibly
9 misconduct. LAEPF has no adequate remedy at law.

10 71. As a direct and proximate result of the Imposter Entity’s conduct, LAEPF
11 has suffered and continues to suffer harm, including but not limited to diverted donations,
12 loss of volunteers and monies paid to train those volunteers for LAEPF’s benefit,
13 reputational damage, and other monetary and nonmonetary damages in an amount to be
14 determined at trial.

15 72. LAEPF is entitled to an order permanently enjoining Imposter Entity and its
16 agents from infringing on the “Community Brigade” mark, actual and enhanced damages,
17 reasonable attorneys’ fees and costs under the Lanham Act, and prejudgment interest.

18
19 **SECOND CAUSE OF ACTION**

20 **FALSE DESIGNATION OF ORIGIN/ADVERTISING –**

21 **VIOLATION OF 15 U.S.C. 1125(a)**

22 (By Plaintiff against Imposter Entity, and DOES 1 through 50)

23 73. Plaintiff incorporates all preceding paragraphs.

24 74. “Community Brigade” is a federally registered trademark owned by LAEPF.
25 Based on that registration, and its use of the Community Brigade name, LAEPF has been
26 operating the genuine Community Brigade team to assist and resolve disasters in
27 Southern California.

28 75. LA County community, LAEPF’s Community Brigade volunteers, and the

1 LA County Fire Department have associated the “Community Brigade” mark with
2 LAEPF’s Community Brigade, thus creating the genuine Community Brigade.

3 76. The Imposter Entity, without consent or authorization from LAEPF, have
4 formed a corporation under the name “Community Brigade”; applied for tax exempt
5 status; wrongfully filed a fictitious business name registration with the Los Angeles
6 County Registrar-Recorder/County Clerk; solicited donations and entered into (or
7 attempted to enter into) agreements with third parties under the name “Community
8 Brigade”; opened a bank account under the name “Community Brigade” at LAEPF’s
9 bank; and represented to LAEPF’s volunteers that the Imposter Entity owns the
10 “Community Brigade” tradename. Thus, Defendants have been operating a fake
11 Community Brigade entity whose sole purpose is to usurp the genuine Community
12 Brigade’s name and reputation.

13 77. The Imposter Entity’s unauthorized use of the “Community Brigade” mark
14 and its operation of the fake Community Brigade entity in commerce is likely to deceive
15 the LA County community, LAEPF’s Community Brigade volunteers, and the LA
16 County Fire Department as to the origin, source, sponsorship, or affiliation of LAEPF’s
17 services bearing the “Community Brigade” mark, and is likely to cause the LA County
18 community, LAEPF’s Community Brigade volunteers, and the LA County Fire
19 Department, that LAEPF’s services bearing the “Community Brigade” mark are
20 authorized, endorsed, or sponsored by the Imposter Entity, or that the Imposter Entity is
21 in some way affiliated with LAEPF.

22 78. The Imposter Entity’s unauthorized use in commerce of the “Community
23 Brigade” mark constitutes false designation of origin and misleading description and
24 representation of fact.

25 79. The Imposter Entity’s unauthorized use in commerce of the “Community
26 Brigade” mark constitutes unfair competition in violation of Section 43(a) of the Lanham
27 Act, 15 U.S.C. § 1125(a).

28 80. The Imposter Entity has infringed and continues to infringe on LAEPF’s

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1 genuine “Community Brigade” mark with full knowledge of LAEPF’s prior rights and
2 with the willful intent to cause confusion on LAEPF’s goodwill. Indeed, some
3 Defendants were involved with LAEPF as early as 2021 and have personal knowledge
4 that LAEPF has been using the Community Brigade name for nearly 5 years.

5 81. The Imposter Entity’s conduct has and will cause immediate and irreparable
6 harm to LAEPF, including harm to its goodwill and reputation in the Los Angeles
7 community at large. The Imposter Entity’s conduct will continue to confuse the LA
8 County community, LAEPF’s Community Brigade volunteers, and the LA County Fire
9 Department unless permanently enjoined by this Court. LAEPF has no adequate remedy
10 at law.

11 82. As a direct and proximate result of the Imposter Entity’s conduct, LAEPF
12 has suffered and continues to suffer harm, including but not limited to diverted donations,
13 loss of volunteers and monies paid to train those volunteers for LAEPF’s benefit,
14 reputational damage, and other monetary and nonmonetary damages in an amount to be
15 determined at trial.

16 83. LAEPF is entitled to an order permanently enjoining Imposter Entity and its
17 agents from infringing on the “Community Brigade” mark, actual and enhanced damages,
18 reasonable attorneys’ fees and costs under the Lanham Act, and prejudgment interest.

19
20 **THIRD CAUSE OF ACTION**

21 **COMMON LAW TRADEMARK INFRINGEMENT**

22 (By Plaintiff against Imposter Entity, and DOES 1 through 50)

23 84. Plaintiff incorporates all preceding paragraphs.

24 85. “Community Brigade” is a federally registered trademark owned by LAEPF.
25 LAEPF also owns the “L.A. County Fire Dept. Community Brigade” logo, which is
26 pending registration with the USPTO.

27 86. LA County community, LAEPF’s Community Brigade volunteers, and the
28 LA County Fire Department have associated the “Community Brigade” mark and “L.A.

1 County Fire Dept. Community Brigade” logo with LAEPF’s Community Brigade.

2 87. The Imposter Entity, without consent or authorization from Plaintiff, have
3 formed a corporation under the name “Community Brigade”; applied for tax exempt
4 status; wrongfully filed a fictitious business name registration with the Los Angeles
5 County Registrar-Recorder/County Clerk; solicited donations and entered into (or
6 attempted to enter into) agreements with third parties under the name “Community
7 Brigade”; and represented to LAEPF’s volunteers that the Imposter Entity owns the
8 “Community Brigade” tradename.

9 88. The Imposter Entity’s unauthorized use of the “Community Brigade” mark
10 and “L.A. County Fire Dept. Community Brigade” logo in commerce is likely to deceive
11 the LA County community, LAEPF’s Community Brigade volunteers, and the LA
12 County Fire Department as to the origin, source, sponsorship, or affiliation of LAEPF’s
13 services bearing the “Community Brigade” mark and/or “L.A. County Fire Dept.
14 Community Brigade” logo, and is likely to cause the LA County community, LAEPF’s
15 Community Brigade volunteers, and the LA County Fire Department, that LAEPF’s
16 services bearing the “Community Brigade” mark and/or “L.A. County Fire Dept.
17 Community Brigade” logo are authorized, endorsed, or sponsored by the Imposter Entity,
18 or that the Imposter Entity is in some way affiliated with LAEPF.

19 89. The Imposter Entity’s conduct as described above constitutes common law
20 trademark infringement of LAEPF’s “Community Brigade” mark and “L.A. County Fire
21 Dept. Community Brigade” logo.

22 90. The Imposter Entity’s conduct has and will cause immediate and irreparable
23 harm to LAEPF, including harm to its goodwill and reputation in the Los Angeles
24 community at large. The Imposter Entity’s conduct will continue to confuse the LA
25 County community, LAEPF’s Community Brigade volunteers, and the LA County Fire
26 Department unless permanently enjoined by this Court. LAEPF has no adequate remedy
27 at law.

28 91. As a direct and proximate result of the Imposter Entity’s conduct, LAEPF

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1 has suffered and continues to suffer harm, including but not limited to diverted donations,
2 loss of volunteers and monies paid to train those volunteers for LAEPF’s benefit,
3 reputational damage, and other monetary and nonmonetary damages in an amount to be
4 determined at trial.

5
6 **FOURTH CAUSE OF ACTION**
7 **COMPUTER CRIMES [Cal. Penal Code § 502]**

8 (By Plaintiff against all Defendants)

9 92. Plaintiff incorporates all preceding paragraphs.

10 93. Defendants gained access to and managed accounts and computer services
11 for LAEPF. Defendants Gibbs and Hauptman particularly were administrators on various
12 computer systems and had access to LAEPF’s computer systems and the account
13 credentials for LAEPF’s accounts.

14 94. Defendants have accessed, copied data from, and in some instances *deleted*
15 *information or removed access and modified credentials*, for systems in use by LAEPF.

16 95. Amongst the most recent examples, LAEPF pays for and utilizes the
17 Spectora software. Defendant Hauptman utilized his access, gained through his work for
18 LAEPF, to cancel LAEPF’s personnel’s access to this software system and all materials
19 saved and prepared (at LAEPF’s expense) which was maintained on that system. LAEPF
20 has had to create a new account and has no access to the information, data, or history of
21 LAEPF’s account.

22 96. California has created an expansive statute to combat computer crimes. (*Cal.*
23 *Penal Code* § 502.) This statute provides both criminal liability and provides a civil
24 private right of action for aggrieved parties. A defendant is subject to liability under the
25 statute for “tampering, interference, damage, and unauthorized access to lawfully created
26 computer data and computer systems.” (*Id.*)

27 97. Plaintiff LAEPF alleges that Defendants conspired to, and did, access, copy,
28 modified, disrupted and interfered with Defendants’ access to, computer data and

1 systems. LAEPF specifically alleges that Defendants have violated, and are liable for,
2 the conduct described in each of *Cal. Penal Code* § 502(c)(1), (2), (3), (4), (5), (6), (7),
3 and (13).

4 98. Plaintiff seeks all remedies available under the Computer Crime statute.
5 Plaintiff specifically seeks:

- 6 a. Compensatory damages for the value of the data and services
7 destroyed or lost to LAEPF (*Cal. Penal Code* § 502(e)(1));
- 8 b. Costs of investigation and validation of data and files, constituting
9 “any expenditure reasonably and necessarily incurred by the owner or
10 lessee to verify that a computer system, computer network, computer
11 program, or data was or was not altered, damaged, or deleted by the
12 access (*Cal. Penal Code* § 502(e)(1));
- 13 c. Injunctive relief, requiring the return of access to LAEPF of all
14 computer systems modified or accessed by Defendants, return of all
15 data obtained from these computer systems, deletion of Defendants’
16 copies of all data copied or obtained by Defendants from these
17 computer systems, and Defendants to cease utilizing these computer
18 systems and data (*Cal. Penal Code* § 502(e)(1));
- 19 d. Attorney’s fees (*Cal. Penal Code* § 502(e)(2));
- 20 e. Punitive damages, in that Defendants have interfered with multiple
21 computer systems, on multiple occasions, and were actively involved
22 with the LAEPF Community Brigade, reflecting full knowledge of
23 LAEPF’s ownership and right to access and control of the data and use
24 of the computer systems involved, with the destruction and removal of
25 access for LAEPF intended solely to impede LAEPF’s charitable
26 works, and solely to benefit Defendants as they seek to convert the
27 donations, credibility, and assets of a long-time charitable organization
28 for their own self-aggrandizement and personal gain, reflecting that

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Defendants actions are knowing, intentional and malicious (*Cal. Penal Code* § 502(e)(4));

f. Forfeiture of all computers and electronic equipment utilized by Defendants in accessing or retaining LAEPF’s data or computer systems, as there can be no other guarantee that Defendants will not unlawfully retain copies for their personal use and such forfeiture is expressly permitted to ensure compliance (*Cal. Penal Code* § 502(g) [“Any computer, computer system, computer network, or any software or data, owned by the defendant, that is used during the commission of any public offense described in subdivision (c) or any computer, owned by the defendant, which is used as a repository for the storage of software or data illegally obtained in violation of subdivision (c) **shall** be subject to forfeiture, as specified in Section 502.01”]);

g. Plaintiff further requests that as part of the injunctive relief requested, the Court consider, as required, reasonable prohibitions on the use by Defendants of computer systems, and particularly consider prohibiting such use by Defendant Hauptman for a reasonable period of time, pending Mr. Hauptman demonstrating an acknowledgment that digital theft and illegal conduct remains theft and illegal conduct and the remarkable departure from any standard of behavior from an individual who was entrusted with access and maintenance of a charities systems for his own personal use (*Cal. Penal Code* § 502(k)(1) [“The court shall consider prohibitions on access to and use of computers”].)

FIFTH CAUSE OF ACTION
CONVERSION

(By Plaintiff against all Defendants)

99. Plaintiff incorporates all preceding paragraphs.

1 100. Defendants are presently advertising and accepting donations under the
2 name of Community Brigade, utilizing the website, name, logo, and history of LAEPF's
3 Community Brigade. Defendants have also attempted to interfere with and direct
4 resources and donations *predating* the creation of their entity to be turned over to
5 Defendants.

6 101. Defendants sent a demand letter, demanding that all monies held by LAEPF
7 for the Community Brigade program be turned over to Defendants, for their unfettered
8 use.

9 102. Plaintiff has been contacted by persons who have requested that their
10 donation (made prior to the creation of the Community Brigade) be retroactively
11 transferred to the Community Brigade, under the false belief intentionally created by
12 Defendants that the Imposter Entity is the true Community Brigade. In other words, after
13 creating a fake doppelganger entity for the purposes of diverting donations, Defendants
14 are now falsely representing to third parties that *Plaintiff* is the phony entity.

15 103. The donations being made are by individuals and entities who are attempting
16 to support the LAEPF Community Brigade, based on the government approval for that
17 work and the history of good works by the LAEPF. All donations diverted to Defendants
18 based on LAEPF's history, name, and reputation, by individuals confused by Defendants
19 impersonation of LAEPF, are monies that are being diverted from LAEPF by trick. But
20 for Defendants impersonation, such donations would be received by LAEPF and utilized
21 as part of LAEPF public service mission.

22 104. Defendants have also converted and utilized Plaintiff's access information
23 and credentials for various computer systems, including using the Spectora software
24 under Plaintiff's Spectora subscription, paid for by Plaintiff LAEPF.

25 105. Defendants have taken possession of, and utilized, Plaintiff's physical
26 equipment, including multiple vehicles which are owned by Plaintiff.

27 106. Defendants have converted the goodwill of LAEPF, and the LAEPF
28 Community Brigade, and taken such goodwill for their own use and benefit. Plaintiff

1 notes that the tort of conversion has continuously expanded in California and conversion
 2 claims are now routinely permitted for conversion of purely intangible assets. (See e.g.,
 3 *Lee v. Luxottica Retail North America, Inc.* (2021) 65 Cal.App.5th 793, 805 [“Goodwill
 4 is an intangible asset that can be sold...”]; *Welco Electronics, Inc. v. Mora* (2014) 223
 5 Cal.App.4th 202 [providing a history of the evolution of the tort of conversion].) Federal
 6 Courts in the Ninth Circuit have previously identified the continuing evolution of this
 7 area of law, but declined to apply it to customer goodwill. (See e.g., *Boon Rawd Trading
 8 Int'l Co., Ltd. v. Paleewong Trading Co.* (N.D.Cal. 2010) 688 F.Supp.2d 940, 955
 9 [“Although this issue -- given the clearly shifting nature of conversion law outlined above
 10 -- is a close one, the undersigned declines to extend the tort of conversion to customer
 11 goodwill”].) In the 16 years since that decision, the evolution of conversion law in
 12 California has not abated, and while we await published authority ending this question,
 13 the unpublished decisions reflect the courts in California no longer consider this to be a
 14 close issue. (See e.g., *Borgman v. Uga-Association Field Servs.* (Oct. 19, 2021, No.
 15 G060399) ___ Cal.App.5th ___ [2021 Cal. App. Unpub. LEXIS 6582, at *16
 16 [“Accordingly, we have no difficulty finding that goodwill is the kind of intangible
 17 property that is subject to conversion”].)

18
19 **SIXTH CAUSE OF ACTION**

20 **CIVIL THEFT**

21 (By Plaintiff against all Defendants)

22 107. Plaintiff incorporates all preceding paragraphs.

23 108. California has grossly expanded the remedies and liability for conversion, as
 24 such conduct now is essentially co-extensive with claims for Civil Theft. (*Cal. Penal
 25 Code* § 496.) Despite policy misgivings from various appellate courts, the California
 26 Supreme Court has confirmed that the statute means what it says, and such liability exists
 27 as written. (See e.g., *Siry Investment, L.P. v. Farkhondehpour* (2022) 13 Cal.5th 333.)

28 109. Defendants’ conduct, as described above, constitutes theft or larceny. (*Cal.*

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1 *Penal Code* § 490a [“Wherever any law or statute of this state refers to or mentions
2 larceny, embezzlement, or stealing, said law or statute shall hereafter be read and
3 interpreted as if the word ‘theft’ were substituted therefor”].) This includes Defendants’
4 conduct in diverting donations to Defendants’ benefit in lieu of such donations being
5 received by Plaintiff as intended by the donors; Defendants’ misappropriation of
6 Plaintiff’s digital accounts (including social media accounts), services and taking of data;
7 Defendants’ misappropriation of Plaintiff’s goodwill; and Defendants’ efforts to seize
8 control of Plaintiff’s assets, including vehicles and operating funds.

9 110. LAEPF respectfully prays for recovery under the statute in full, including
10 treble damages, attorney fees, and for punitive damages. Punitive damages are
11 appropriate, as Defendants have engaged in multiple intentional wrongful acts, on
12 multiple occasions, and were actively involved with the LAEPF Community Brigade,
13 reflecting full knowledge of LAEPF’s ownership and right to access and control of the
14 data, computer systems, assets, reputation, and government associations involved, with
15 Defendants’ acts intended to impede LAEPF’s charitable works, and solely to benefit
16 Defendants as they seek to convert the donations, credibility, and assets of a long-time
17 charitable organization for their own self-aggrandizement and personal gain, reflecting
18 that Defendants’ actions are knowing, intentional and malicious. These actions were
19 undertaken by the individual defendants, directly and under the name of the Imposter
20 Entity; the individual defendants constitute the ownership and management of the
21 Imposter Entity and control the Imposter Entity and its policies and decision-making.

22
23 **SEVENTH CAUSE OF ACTION**

24 **BREACH OF CONTRACT**

25 (By Plaintiff against Defendants Pierson, Miller, Phillips, Hauptman, and Gibbs)

26 111. Plaintiff incorporates all preceding paragraphs.

27 112. On or about July 1, 2024, Defendant Gibbs and LAEPF entered into an
28 Independent Contractor Agreement (“Gibbs Contractor Agreement”) under which

1 Defendant Gibbs agreed to render certain services to LAEPF pursuant to a Statement of
2 Work executed on July 18, 2024.

3 113. Between August of 2024 and January of 2026, Defendant Gibbs provided
4 LAEPF with invoices detailing services rendered under the Gibbs Contractor Agreement
5 for the preceding month.

6 114. While being compensated for his services and acting as an agent of LAEPF,
7 Defendant Gibbs materially breached several provisions of the Gibbs Contractor
8 Agreement. Specifically, Defendant Gibbs intentionally acted adversely to LAEPF by
9 contributing or managing the Imposter Entity’s operations and by delivering work
10 product developed for LAEPF to the Imposter Entity. Examples of the work performed
11 by Defendant Gibbs for LAEPF are the work he performed to secure a logo for LAEPF’s
12 Community Brigade (the “L.A. County Fire Dept. Community Brigade” logo) and write
13 instructions and manuals for LAEPF. Although Defendant Gibbs has been paid for these
14 tasks, he has wrongfully appropriated the logo and the instructions for the benefit of
15 himself and the Imposter Entity. All such work performed by Defendant Gibbs was
16 undertaken pursuant to the Gibbs Contractor Agreement and constituted contract
17 deliverables created for the benefit and ownership of LAEPF.

18 115. Defendants Gibbs, Pierson, Miller, Hauptman, and Phillips, in their personal
19 capacities, entered into agreements with LAEPF entitled “Community Brigade Program
20 Waiver and Program Agreement” (“Volunteer Agreement(s”).

21 116. The Volunteer Agreements permitted Defendants Gibbs, Pierson, Miller, and
22 Phillips to be volunteer participants of LAEPF’s Community Brigade.

23 117. Under the Volunteer Agreements, Defendants Gibbs, Pierson, Miller,
24 Hauptman, and Phillips agreed to comport themselves with all Community Brigade rules.
25 Defendants Gibbs, Pierson, Miller, Hauptman, and Phillips agreed that they are
26 prohibited from, *inter alia*:

- 27 • Engaging in conduct that may conflict with the interests of LAEPF’s
28 Community Brigade;

- 1 • Acting independently of and adversely to the best interests of LAEPF and
- 2 LAEPF’s Community Brigade;
- 3 • Failing to be straightforward and fully truthful and accurate in
- 4 Community Brigade-related communications; and
- 5 • Engaging in conduct outside of designated Community Brigade activities
- 6 that may discredit the Community Brigade, LAEPF, the County of Los
- 7 Angeles, or the Los Angeles County Fire Department.

8 118. Defendants Gibbs, Pierson, Miller, Hauptman, and Phillips breached their
 9 Volunteer Agreements when they, *inter alia*, (1) waged a campaign to seize control of
 10 LAEPF’s Community Brigade; (2) established or conspired to establish the Imposter
 11 Entity; (3) filed for tax-exempt status for the Imposter Entity to compete with LAEPF; (3)
 12 filed a fraudulent FBN registration for the Imposter Entity to compete with LAEPF; (4)
 13 attempted to enter into agreements with third parties using LAEPF’s Community Brigade
 14 reputation and goodwill without LAEPF’s knowledge or authorization; (5) opened a bank
 15 account at the same bank as LAEPF to potentially divert donations and/or confuse
 16 donors; (6) solicited and likely collected donations under LAEPF’s “Community
 17 Brigade” mark and “L.A. County Fire Dept. Community Brigade” logo; (7) seized
 18 control over LAEPF’s Community Brigade social media accounts; and (8) disseminated
 19 false information (written and oral) to Community Brigade volunteers to sway opinions
 20 and commandeer control of the Brigade, and to cause Brigade members to terminate their
 21 relationship with LAEPF.

22 119. All conditions required for Defendants Gibbs, Pierson, Miller, Hauptman,
 23 and Phillips’ performance under their Volunteer Agreements have occurred. LAEPF has
 24 performed every obligation required of it per the Volunteer Agreements.

25 120. As a direct and proximate result of Defendants Gibbs, Pierson, Miller,
 26 Hauptman, and Phillips’ breaches of their Volunteer Agreements, LAEPF has suffered
 27 and continues to suffer harm, including but not limited to diverted donations, loss of
 28 volunteers and monies paid to train those volunteers for LAEPF’s benefit, reputational

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1 damage, and other monetary and nonmonetary damages in an amount to be determined at
2 trial.

3
4 **EIGHTH CAUSE OF ACTION**

5 **VIOLATION OF BUS. & PROF. CODE §§ 17200, ET SEQ.**

6 (By Plaintiff against all Defendants)

7 121. Plaintiff incorporates all preceding paragraphs.

8 122. California *Business and Professions* Code §17200 states in pertinent part:
9 “...unfair competition shall mean and include any unlawful, unfair or fraudulent business
10 act or practice...”

11 123. Defendants’ actions and omissions described herein constitute unlawful,
12 unfair, and fraudulent activities as proscribed by California’s Unfair Competition Law.

13 124. Defendants’ conduct caused and continues to cause substantial injury and a
14 loss of revenue to Plaintiff.

15 125. Accordingly, Plaintiff is entitled to restitution and temporary and permanent
16 injunctive relief.

17 126. Defendants’ conduct was willful and malicious and in conscious disregard of
18 Plaintiff’s rights with the intent to vex, injure and annoy Plaintiff, such as to constitute
19 oppression, fraud and/or malice under California *Civil Code* §3294. Imposter Entity’s
20 conduct, as described above, was carried out by its officers, directors and or/managing
21 agents, or by lower-level employees whose conduct was knowingly authorized and
22 ratified by the officers, directors and/or managing agents of Imposter Entity.

23 Accordingly, Plaintiff is entitled to punitive damages in an amount appropriate to punish
24 and make an example of Defendants.

25 ///

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NINTH CAUSE OF ACTION

DECLARATORY RELIEF

(By Plaintiff against all Defendants)

127. Plaintiff incorporates all preceding paragraphs.

128. An actual conflict exists between LAEPF and Defendants such that a declaration of rights is necessary.

129. LAEPF is the rightful and lawful owner of the “Community Brigade” mark and tradename, and “L.A. County Fire Dept. Community Brigade” logo. Defendants have claimed they are the rightful and lawful owners despite the Imposter Entity being incorporated *years* after LAEPF began using the mark, tradename, and logo in commerce.

130. In addition, LAEPF is the rightful and lawful owner of any and all monies and physical assets donated to the Community Brigade program. As part of their campaign to seize control over the Community Brigade program, Defendants have demanded that LAEPF turn over these monies and assets.

131. As a result, a judicial declaration and determination is necessary to adjudge that LAEPF is the rightful and lawful owner of the “Community Brigade” mark and tradename, and “L.A. County Fire Dept. Community Brigade” logo, and the monies and assets donated to LAEPF for the Community Brigade program.

PRAYER

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

- I. For damages to be determined at time of trial, but alleged here for the purposes of giving notice of the amount sought to be in the amount of \$10,000,000;
- II. For compensatory and consequential damages according to proof at time of trial;
- III. For a permanent injunction, enjoining Defendants and all persons in active

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- 1 concert or participation with Defendants from directly or indirectly
- 2 infringing the Community Brigade trademark;
- 3 IV. For a declaration that LAEPF is the rightful and lawful owner of the
- 4 “Community Brigade” mark and tradename, and “L.A. County Fire Dept.
- 5 Community Brigade” logo, and the monies and assets donated to LAEPF for
- 6 the Community Brigade program;
- 7 V. For pre-judgment interest at the highest rate allowable by law;
- 8 VI. For attorneys’ fees and costs recoverable by law;
- 9 VII. For punitive damages recoverable by law; and
- 10 VIII. For such other and further relief as this Court deems just.

11
12 Respectfully submitted on this 6th day of March, 2026, by:

13 MADISON LAW, APC

14 /s/ Susanna F. Wiseman

15 Ali Parvaneh,
16 Susanna F. Wiseman,
17 Jacob A. Pace,
18 Attorneys for Plaintiff

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