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8 *Attorneys for Plaintiff, Brandon Charles*

FILED
San Francisco County Superior Court
AUG 11 2017
CLERK OF THE COURT
BY: *[Signature]*
Deputy Clerk

9 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF SAN FRANCISCO**
11 **UNLIMITED JURISDICTION**

12 BRANDON CHARLES, an individual,

13 Plaintiff,

14 vs.

15 SOCIAL FINANCE, INC., [a Delaware
Corporation],

16 Defendant.

Case Number:

CGC-17-560682

COMPLAINT FOR:

1. RETALIATION IN VIOLATION OF THE CALIFORNIA FEHA;
2. RETALIATION IN VIOLATION OF CAL. LAB. CODE § 1102.5.

JURY TRIAL DEMANDED

BY FAX
ONE LEGAL LLC

17 **COMPLAINT AND DEMAND FOR JURY TRIAL**

18 Plaintiff Brandon Charles ("Plaintiff" or "Mr. Charles"), by and through his attorneys, The Ottinger
19 Firm, P.C., as and for his Complaint in this action against Defendant Social Finance, Inc. ("SoFi" or
20 "Defendant"), hereby alleges as follows:

21 **PRELIMINARY STATEMENT**

22 No woman should be forced to endure sexual harassment from a male superior because he holds
23 her job and financial security in his hands. Yet, companies caught red-handed doing this have popped up
24 with increasing regularity throughout the San Francisco Bay Area. Loans should never be canceled at the
25 expense of college students forced to pay higher rates or miss payments in order to prop up the façade of
26 high performance for loan managers looking to pad their wallets with ill-gained bonuses. Yet, SoFi
27 endorsed this behavior by shielding the employees who did this very thing. Such conduct is
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1 unconscionable, and has no place in our society today – nor has it ever.

2 Plaintiff Brandon Charles saw this very thing occurring in his workplace. But when he saw
3 women harassed with unsolicited – and unmistakably unwanted – sexual comments from their male
4 superiors, Mr. Charles did what anyone in his shoes should do: report it. When Mr. Charles learned that
5 SoFi managers were fraudulently canceling loans to pump up their apparent performance in order to reap
6 plump bonuses, he reported it. Mr. Charles took a stand against inequity and misogyny; he was fired for
7 it. Defendant’s stance is that, despite their claims to the contrary, their female employees are eager to be
8 shown the explicit details regarding the anal escapades of their bosses. Being asked to fetch K-Y lube is
9 a normal part of the work environment for women, SoFi purports. Furthermore, SoFi thinks it’s okay for
10 its managers to cheat needy students. Defendant’s standpoint is both absurd and conducive to the exact
11 perpetration of sexual harassment, allowance of fraud, and retaliation against whistleblowers that
12 occurred in this case.

13 **NATURE OF THE CLAIMS**

14 1. This is an action seeking declaratory, injunctive, and equitable relief, as well as monetary
15 damages, to redress Defendant’s unlawful employment practices against Plaintiff, including Defendant’s
16 unlawful interference with, restraint, and denial of Plaintiff’s exercise of and/or attempt to exercise his
17 rights under the California Fair Employment and Housing Act, Cal. Gov. Code §§ 12940 *et seq.*
18 (“FEHA”) and California Labor Code § 1102.5 (the “Whistleblower statute”).

19 2. Defendant’s retaliatory, and otherwise unlawful conduct was knowing, malicious, willful
20 and wanton, and/or showed a reckless disregard for Plaintiff, which has caused and continues to cause
21 Plaintiff to suffer substantial economic and non-economic damages and severe mental anguish and
22 emotional distress.

23 **JURISDICTION AND VENUE**

24 3. Plaintiff is informed and believes, and thereon alleges that Defendant Social Finance, Inc.,
25 was, at all relevant times, operating within the state of California, and thus subject to the jurisdiction of
26 California courts by reason of “minimum contacts,” and did transact and conduct business in the State of
27 California, and is thus subject to the jurisdiction of all laws, regulations, and court decisions rendered by
28

1 the state of California.

2 4. Jurisdiction is conferred on this Court because Defendant, named herein, conducted
3 business in the State of California. Jurisdiction is conferred on this Court as to all causes of action
4 because they arise under state statutory or common law. Jurisdiction is proper in this Court because
5 alleged damages exceed \$25,000.00.

6 5. Venue is proper in this Court because Defendant SoFi's principal place of business is in
7 San Francisco, California in San Francisco County.

8 **PROCEDURAL REQUIREMENTS**

9 6. Prior to the filing of this Complaint, Plaintiff filed charges of retaliation and failure to
10 prevent harassment in violation of the FEHA with the California Department of Fair Employment and
11 Housing ("DFEH") against the Defendants. The DFEH charges arise out of the same facts alleged herein.
12 On or about August 11, 2017, Plaintiff received a "right to sue" letter from the DFEH. Copies of
13 Plaintiff's DFEH Charges and notices of right to sue are annexed to this Complaint as "Exhibit A," and
14 are incorporated by reference herein.

15 7. Any and all other prerequisites to the filing of this suit have been met.

16 **PARTIES**

17 8. Plaintiff is an individual who resided in California for the duration of his employment, the
18 time period when the facts alleged occurred. Plaintiff was employed by Defendant, Social Finance, Inc.,
19 as a Senior Operations Manager from March 1, 2017, to June 5, 2017, in Healdsburg, California. At all
20 relevant times, Plaintiff met the definition of "employee" under all applicable state law.

21 9. Defendant SoFi is a Delaware Corporation with its principle place of business in San
22 Francisco, California in San Francisco County. SoFi is an online finance company.

23 10. Defendant regularly employed five or more persons at all relevant times herein, and is an
24 "employer" as defined under the California FEHA, California Labor Code § 1102.5, and under all other
25 relevant state laws.

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FACTUAL ALLEGATIONS

11. On March 1, 2017, Plaintiff was hired by Defendant as a Senior Operations Manager in Defendant's Healdsburg, California office.

12. Almost immediately, Plaintiff encountered illicit conduct at SoFi.

I. SoFi Executives Cancel Loan Applications to Increase Their Own Bonuses Despite Resulting Harm to Unsuspecting Consumers, and Plaintiff is Subject to Retaliation for His Internal Reports and Complaints in Opposition to Such Misconduct

13. On March 13, 2017, Plaintiff learned from a coworker that Operations Managers were mishandling loan applications – that of an array of consumers, including, in particular, student loan and consolidation loan applicants – in an effort to skew their performance “results” to enhance their own quarterly bonuses.

14. Such quarterly bonuses for Operations Managers could fall within a range of zero to \$15,000 per quarter, and Operations Managers were engaging in two forms of misconduct to enhance their bonus earnings toward the top of this range.

15. Specifically, Plaintiff discovered that Operations Managers were simply “canceling” loan applications that their own subordinates had failed to process without internal errors. Rather than recording those loan applications as submitted but affected by internal errors, Operations Managers were simply canceling such applications entirely, thereby avoiding the need to report their internal errors, which would otherwise have decreased their performance metrics and quarterly bonus awards.

16. Plaintiff promptly reported this misconduct by email and in multiple subsequent communications to Mr. Rick Caudill, his direct supervisor and Senior Director of Operations of Review, as well as two Raoul McDuff, a human resources representative.

17. On March 22, 2017, Plaintiff complained to Raoul McDuff, again; Jing Liao, President of Human Resources; and Robert Meck, Senior Vice President of Operation about the falsified basis for loan cancelations being committed by Operations Managers.

18. On March 23, 2017, William Coplin, Vice President of Human Resources, visited the Healdsburg SoFi office to investigate Plaintiff's March 17, 2017, complaint. Mr. Coplin then had a

1 meeting with Plaintiff to discuss the details of the complaint.

2 19. On April 4, 2017, Mr. Coplin met with Plaintiff in Mr. Meck's office. Mr. Coplin stated
3 that Mr. Caudill had confirmed Plaintiff's account of the loans being fraudulently canceled by managers.

4 20. Though Plaintiff's complaint was substantiated, Mr. Coplin then reported that Defendant
5 had issued Mr. Caudill only a verbal warning about the fraud.

6 21. On May 15, 2017, Mr. Caudill ordered an investigation into Plaintiff's two direct reports
7 without cause; without notifying Plaintiff, the direct superior responsible for the two individuals; and
8 without notifying human resources.

9 22. Mr. Caudill conducted his investigation in a manner that maligned Plaintiff, as well as his
10 direct reports, and did so in an effort to both intimidate and dissuade Plaintiff from continuing to report
11 and oppose internal misconduct, and to undermine Plaintiff's credibility and the significance of his prior
12 reports.

13 23. Mr. Caudill's investigation had no reasonable justification and attempted to avoid
14 procedure and proper channels.

15 24. The clear motivating factor for Mr. Caudill to initiate this investigation was to retaliate
16 against Plaintiff for his report of fraud against Mr. Caudill.

17 25. That same day, Plaintiff emailed Mr. McDuff, Mr. Coplin, and Mr. Liao detailing the
18 retaliation he was experiencing at the hands of Mr. Caudill for reporting the loan cancelation fraud.

19 26. Defendant offered no reasonable solution to Plaintiff's retaliation at that time.

20 27. Instead, Plaintiff was directed to desist from further reports or communications
21 concerning the mishandling of loan applications that he had reported through appropriate channels out of
22 concern for the arbitrary harm that Operations Managers were inflicting upon customers simply to
23 enhance their own bonus earnings.

24 28. Furthermore, on May 26, Plaintiff sent a screenshot to Mr. Caudill revealing that Isaac
25 Buie, a SoFi manager in Salt Lake City, had asked another manager, Brian Walker, to unassign
26 applications in an effort to avoid a negative impact on performance evaluations.

27 29. Despite the fact that unassigning applications could detrimentally affect these customer in
28 various ways, the issue was not addressed by Mr. Caudill, or anyone else for that matter.

1 **II. Sofi Executives Engage in Sexual Harassment; Plaintiff is Subject to Retaliation for**
2 **Speaking out on Behalf of Affected Co-Workers**

3 30. In May, Plaintiff became aware that a female employee was being subjected to unwanted,
4 overtly sexual conduct by Michael Phillips, Senior Manager of Operations.

5 31. This misconduct included the interjection of explicit sexual innuendo and statements into
6 normal workplace communications, despite the evident discomfort of the affected female employee.

7 32. Plaintiff subsequently learned that Mr. Phillips was subjecting a second female
8 subordinate to similarly lewd and unwelcome sexual commentary, including statements concerning his
9 sexual partners and experiences with anal sex.

10 33. Mr. Phillips had also indicated to Mr. Charles on prior occasions that he had a sexual
11 interest in a third junior female employee.

12 34. For example, rather than referring to the young woman by name in the normal course of
13 his workplace communications with Mr. Charles, Mr. Phillips would instead refer to her by way of lewd,
14 sexualized gestures intended to emphasize her physical appearance and attributes.

15 35. These gestures, like Mr. Phillips's other sexual overtures regarding his experiences with
16 anal sex, were unwelcome and degrading as to the young woman, and were objectively inappropriate and
17 offensive to any reasonable employee in the workplace.

18 36. On May 21, 2017, Plaintiff emailed Mr. McDuff, Mr. Coplin, and Mr. Liao regarding the
19 sexual harassment perpetrated by Mr. Phillips against vulnerable female co-workers.

20 37. On June 5, 2017, Plaintiff was invited to a meeting with Mr. McDuff and Mr. Rinaldi,
21 who indicated that the purpose of meeting with Plaintiff was to discuss his prior complaints about
22 fraudulent cancelations of loans, as well as unchecked sexual harassment against female co-workers in
23 his workplace.

24 38. Mr. McDuff and Mr. Rinaldi stated that they viewed Plaintiff's complaints as devoid of
25 merit and that such complaints were outside Plaintiff's appropriate duties to report to management.

26 39. Mr. McDuff and Mr. Rinaldi then terminated Plaintiff's employment with Defendant
27 SoFi.

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FIRST CAUSE OF ACTION
(Retaliation in Violation of the California FEHA)

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40. Plaintiff alleges and incorporates by reference the allegations in each of the preceding paragraphs as if fully set forth herein.

41. California Government Code section 12940(h) provides that it is unlawful for any employer to discharge or expel any person because that person opposed practices prohibited by the California FEHA.

42. At all times relevant hereto, Defendant was an employer, and Plaintiff was an employee of Defendant.

43. Defendant knew that Plaintiff opposed, as evidenced by his repeated reporting of and complaints about Defendant condoning and failing to remedy sexual harassment of multiple female employees by another co-employee of Defendant.

44. Plaintiff made multiple complaints about Defendant's above-mentioned practices.

45. Defendant terminated plaintiff at a meeting to address Plaintiff's complaints after informing Plaintiff that Defendant believed his claims were without merit.

46. Defendant terminated plaintiff because he opposed Defendant's unlawful practices.

47. As a proximate result of the acts of Defendant, Plaintiff has suffered damages in an amount according to proof.

48. As a further proximate result of Defendant's retaliatory actions against Plaintiff, as alleged above, Plaintiff has and continues to incur attorney's fees and costs to enforce his rights, which Plaintiff will seek to recover pursuant to California Government Code §12965(b).

49. Defendant's retaliatory and otherwise unlawful conduct towards Plaintiff constitutes a willful and wanton violation of the California FEHA, was outrageous and malicious, was intended to injure Plaintiff, and was done with conscious disregard of Plaintiff's civil rights, entitling Plaintiff to an award of punitive damages.

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SECOND CAUSE OF ACTION
(Retaliation in Violation of California Labor Code § 1102.5)

50. Plaintiff alleges and incorporates by reference the allegations in each of the preceding paragraphs as if fully set forth herein.

51. Defendant SoFi, a corporation, is an employer as defined under California Labor Code § 1102.5.

52. Venue is proper because the unlawful employment practices complained of herein occurred in San Francisco County.

53. Plaintiff is an adult person and a resident of the County of Sonoma in the State of California.

54. Defendant's actions against Plaintiff, as alleged above, constitute unlawful retaliation in employment in violation of California Labor Code § 1102.5, because Defendant terminated Plaintiff's employment on account of Plaintiff's disclosure to persons with authority over him at Defendant of information that Plaintiff had reasonable cause to believe disclosed a violation of state or federal law, or a violation of or noncompliance with a local, state, or federal rule or regulation; and/or because Defendant believed that Plaintiff disclosed or may have disclosed such information to a government or law enforcement agency.

55. As a proximate result of Defendant's retaliatory action against Plaintiff, as alleged above, Plaintiff has been harmed in that Plaintiff has suffered the loss of the salary, benefits, and additional amounts of money Plaintiff would have received if Plaintiff had not been terminated from Defendant. As a result of such retaliation and consequent harm, Plaintiff has suffered such damages in an amount according to proof.

56. As a further proximate result of Defendant's retaliatory actions against Plaintiff, as alleged above, Plaintiff has been harmed in that Plaintiff has suffered the intangible loss of such employment-related opportunities. As a result of such retaliation and consequent harm, Plaintiff has suffered such damages in an amount according to proof.

57. As a further proximate result of Defendant's retaliatory actions against Plaintiff, as alleged above, Plaintiff has and continues to incur attorney's fees and costs to enforce his rights, which

1 Plaintiff will seek to recover pursuant to California Code of Civil Procedure (“CCP”) §1021.5.

2 **PRAYER FOR RELIEF**

3 WHEREFORE, Plaintiff prays for judgment as follows:

4 A. A declaratory judgment that the actions, conduct, and practices of Defendant complained
5 of herein violated the laws of the State of California;

6 B. An injunction and order permanently restraining Defendant from engaging in such
7 unlawful conduct;

8 C. An award of damages in an amount to be determined at trial, plus prejudgment interest,
9 to compensate Plaintiff for all monetary and/or economic hardship, including, but not limited to, the
10 loss of past and future income, wages, compensation, and other benefits of employment;

11 D. An award of damages in an amount to be determined at trial, plus prejudgment interest,
12 to compensate Plaintiff for all non-monetary and compensatory harm, including, but not limited to,
13 compensation for his depression, humiliation, embarrassment, stress and anxiety, loss of self-esteem
14 and self-confidence, emotional pain and suffering, harm to his personal and professional reputations and
15 loss of career fulfillment;

16 E. An award of damages for any and all other monetary and/or non-monetary losses
17 suffered by Plaintiff in an amount to be determined at trial, plus prejudgment interest;

18 F. An award of punitive damages pursuant to the FEHA;

19 G. For reasonable attorney’s fees and costs, including expert witness fees, pursuant to
20 California Government Code §12965(b) and California CCP §1021.5;

21 H. For costs of suit herein incurred; and

22 I. For such other and further relief as the Court deems just and proper.

23 Dated: August 11, 2017

24 San Francisco, CA


25 Robert W. Ottinger (SBN 156825)
26 THE OTTINGER FIRM, P.C.
27 535 Mission Street
28 San Francisco, CA 94105
robert@ottingerlaw.com
Tel: 415-262-0096
Fax: 212-571-0505

Attorney for Plaintiff

Exhibit A



DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

August 11, 2017

Brandon Charles
3730 Pleasant Street
Cincinnati, Ohio 45227

RE: Notice of Case Closure and Right to Sue
DFEH Matter Number: 937838-305784
Right to Sue: Charles / Social Finance, Inc.

Dear Brandon Charles,

This letter informs you that the above-referenced complaint was filed with the Department of Fair Employment and Housing (DFEH) has been closed effective August 11, 2017 because an immediate Right to Sue notice was requested. DFEH will take no further action on the complaint.

This letter is also your Right to Sue notice. According to Government Code section 12965, subdivision (b), a civil action may be brought under the provisions of the Fair Employment and Housing Act against the person, employer, labor organization or employment agency named in the above-referenced complaint. The civil action must be filed within one year from the date of this letter.

To obtain a federal Right to Sue notice, you must visit the U.S. Equal Employment Opportunity Commission (EEOC) to file a complaint within 30 days of receipt of this DFEH Notice of Case Closure or within 300 days of the alleged discriminatory act, whichever is earlier.

Sincerely,

Department of Fair Employment and Housing



STATE OF CALIFORNIA | Business, Consumer Services and Housing Agency

GOVERNOR EDMUND G. BROWN JR.

DEPARTMENT OF FAIR EMPLOYMENT & HOUSING

2218 Kausen Drive, Suite 100 | Elk Grove | CA | 95758
800-884-1684 | TDD 800-700-2320
www.dfeh.ca.gov | email: contact.center@dfeh.ca.gov

DIRECTOR KEVIN KISH

Enclosures

cc:

1 **COMPLAINT OF EMPLOYMENT DISCRIMINATION**
2 **BEFORE THE STATE OF CALIFORNIA**
3 **DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING**
4 **Under the California Fair Employment and Housing Act**
5 **(Gov. Code, § 12900 et seq.)**

6 In the Matter of the Complaint of
7 Brandon Charles, Complainant.
8 3730 Pleasant Street
9 Cincinnati, Ohio 45227

DFEH No. 937838-305784

vs.

10 Social Finance, Inc., Respondent.
11 ONE LETTERMAN DRIVE, SUITE 4700
12 BLDG A
13 SAN FRANCISCO, California 94129

14 Complainant alleges:

15 1. Respondent **Social Finance, Inc.** is a **Private Employer** subject to suit under the
16 California Fair Employment and Housing Act (FEHA) (Gov. Code, § 12900 et seq.).
Complainant believes respondent is subject to the FEHA.

17 2. On or around **June 05, 2017**, complainant alleges that respondent took the
18 following adverse actions against complainant: **Retaliation Terminated**, .
19 **Engagement in Protected Activity** .

20 3. Complainant **Brandon Charles** resides in the City of **Cincinnati**, State of **Ohio**. If
21 complaint includes co-respondents please see below.

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Additional Complaint Details:

On March 1, 2017, Plaintiff was hired by Defendant as a Senior Operations Manager in Defendants Healdsburg, California office.

On March 13, 2017, Plaintiff learned from a coworker that Operations Managers were mishandling loan applications in an effort to skew their performance results to enhance their own quarterly bonuses.

Specifically, Plaintiff discovered that Operations Managers were simply canceling loan applications that their own subordinates had failed to process without internal errors. Rather than recording those loan applications as submitted but affected by internal errors, Operations Managers were canceling such applications entirely, thereby avoiding the need to report their internal errors, which would otherwise have decreased their performance metrics and quarterly bonus awards.

Plaintiff promptly reported this misconduct by email and in multiple subsequent communications to Mr. Rick Caudill, his direct supervisor and Senior Director of Operations of Review, as well as two Raoul McDuff, a human resources representative. On April 4, 2017, Mr. Coplin stated that Mr. Caudill had confirmed Plaintiff's account of the loans being fraudulently canceled by managers.

Though Plaintiff's complaint was substantiated, Mr. Coplin then reported that Defendant had issued Mr. Caudill only a verbal warning about the fraud.

On May 15, 2017, Mr. Caudill ordered an investigation into Plaintiffs two direct reports without cause, without notifying Plaintiff, the direct superior responsible for the two individuals, and without notifying human resources.

Mr. Caudill conducted his investigation in a manner that maligned Plaintiff, as well as his direct reports, and did so in an effort to both intimidate and dissuade Plaintiff from continuing to report and oppose internal misconduct, and to undermine Plaintiffs credibility and the significance of his prior reports.

Mr. Caudill's investigation had no reasonable justification and attempted to avoid procedure and proper channels.

The clear motivating factor for Mr. Caudill to initiate this investigation was to retaliate against Plaintiff for his report of fraud against Mr. Caudill.

That same day, Plaintiff emailed Mr. McDuff, Mr. Coplin, and Mr. Liao detailing the retaliation he was experiencing at the hands of Mr. Caudill for reporting the loan cancellation fraud.

Defendant offered no reasonable solution to Plaintiff's retaliation at that time. Instead, Plaintiff was directed to desist from further reports or communications concerning the mishandling of loan applications.

In May, Plaintiff became aware that a female employee was being subjected to unwanted, overtly sexual conduct by Michael Phillips, Senior Manager of Operations.

This misconduct included the interjection of explicit sexual innuendo and statements into normal workplace communications, despite the evident discomfort of the affected female employee.

Plaintiff subsequently learned that Mr. Phillips was subjecting a second female subordinate to similarly lewd and unwelcome sexual commentary, including statements concerning his sexual partners and experiences with anal sex.

These gestures were unwelcome, degrading, and were objectively inappropriate and offensive to any reasonable employee in the workplace.

On May 21, 2017, Plaintiff emailed Mr. McDuff, Mr. Coplin, and Mr. Liao regarding the sexual harassment perpetrated by Mr. Phillips against vulnerable female co-workers.

On June 5, 2017, Plaintiff was invited to a meeting with Mr. McDuff and Mr. Rinaldi, who indicated that the purpose of meeting with Plaintiff was to discuss his prior complaints about fraudulent cancellations of loans, as well as unchecked sexual harassment against female co-workers in his workplace.

Mr. McDuff and Mr. Rinaldi stated that they viewed Plaintiff's complaints as devoid of merit and that such complaints were outside Plaintiff's appropriate duties to report to management.

Mr. McDuff and Mr. Rinaldi then terminated Plaintiff's employment with Defendant SoFi.

1 VERIFICATION

2 I, **Robert Ottinger**, am the Attorney for Complainant in the above-entitled complaint.
3 I have read the foregoing complaint and know the contents thereof. The same is
4 true of my own knowledge, except as to those matters which are therein alleged on
5 information and belief, and as to those matters, I believe it to be true.

6 On August 11, 2017, I declare under penalty of perjury under the laws of the State of
7 California that the foregoing is true and correct.

8 **San Francisco, California**
9 **Robert Ottinger**

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