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**SUPERIOR COURT OF STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

RAMONA MAYON, Plaintiff, v. COALITION ON HOMELESSNESS; JENNIFER FRIEDENBACH as executive director of COALITION ON HOMELESSNESS; LAWYERS COMMITTEE CIVIL RIGHTS SAN FRANCISCO; ACLU OF NORTHERN CALIFORNIA; URBAN ALCHEMY; LENA MILLER, as executive Director of URBAN ALCHEMY; and DOES 1-50 Defendants	Case No. COMPLAINT FOR DAMAGES: FRAUD (Cal. Civ. Proc. Code CCP § 338(d)); RIGHT TO PUBLICITY (Cal. Civ. Code CIV § 3344); UNFAIR BUSINESS PRACTICES (Bus. & Prof. Code BPC § 17200) DEFAMATION/LIBEL (Cal. Civ. Code CIV § 45); INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (Cal. Civ. Code CIV § 1708); Date: Time: Dept: DEMAND FOR JURY TRIAL
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To this Honorable Court,

By taking Plaintiff's personal story and embedding a distorted version within their high-profile litigation without her consent, the first four Defendants knowingly and intentionally created the false public impression that Plaintiff is a supporter, beneficiary, or ideological ally of the Coalition on Homelessness and its legal strategies. This false affiliation is highly offensive to Plaintiff and has caused her significant reputational harm and emotional distress. It has undermined her credibility with her own peers and constituents, who now mistakenly believe she has aligned herself with an organization whose approaches she explicitly rejects. Defendant's actions were not merely negligent but were done with a reckless disregard for the truth of Plaintiff's actual beliefs and advocacy, and with the knowledge that such a false affiliation would cause her. The harm that this instant case addresses was delivered by the last two defendants on December 13, 2024 by way of defamation/ libel.

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction pursuant to California law, as the causes of action arise under California statutes and common law. Personal jurisdiction is proper because Defendants conduct substantial business in California and committed the acts alleged herein within the state.

3. Venue is proper in San Francisco County under CCP §395 because the events giving rise to this Complaint occurred in San Francisco.

PARTIES

4. Plaintiff RAMONA MAYON ("MAYON") is an individual residing in San Francisco County and was, at all relevant times, engaged in advocacy for the rights of individuals who are vehicle dwellers as a published author and a tenant union organizer.

5. Defendant JENNIFER FRIEDENBACH ("FRIEDENBACH") is Executive Director of the Coalition on Homelessness, a private nonprofit engaged in advocacy around homelessness in San Francisco. She also sits on the oversight committee of the funding source where the plaintiff lived (and organized): Our City, Our Home (OCOH). She has been on it since 2020 and is currently.

5. Defendant COALITION ON HOMELESSNESS ("COH") is a California nonprofit corporation headquartered in San Francisco at 280 Turk St. San Francisco, CA 94102

6. Defendant LAWYERS COMMITTEE FOR CIVIL RIGHTS SAN (“LCCRSF”) is a local nonprofit corporation that began the case Sept 7, 2022 — all references to legal counsel will about the ACLU as they are the ones who took and, Sept 2025, settled the case. The address is 131 Steuart St. San Francisco, CA 94105.

7. Defendant AMERICAN CIVIL LIBERTIES UNION (“ACLU”) of NORTHERN CALIFORNIA is a national nonprofit corporation conducting substantial and continuous business in California, including litigation + advocacy. Address is 39 Drumm St. San Francisco CA 94111

8. Defendant LENA MILLER (“MILLER”) is founder and CEO of URBAN ALCHEMY, a California nonprofit contracted by the City to operate certain residential and shelter facilities. She also sat (2020-22) on the oversight committee of the funding source where the plaintiff lived (and organized): Our City, Our Home (OCOH).

9. Defendant URBAN ALCHEMY (“UA”) is a California nonprofit headquartered in San Francisco providing contracted homeless shelter and service operations. Address 255 Golden Gate Ave, San Francisco, CA 94105

10. DOES 1–50 are additional persons or entities whose identities are presently unknown but who participated in the acts alleged herein.

STATEMENT OF CASE

11. In late 2020, Plaintiff MAYON filed pro se litigation against the City and County of San Francisco in State Court, challenging actions affecting the tent encampment she resided in for three months during the pandemic, shortly after being widowed and losing her RV home of many years. No written notice had been given, although verbal had been, to a single person, who spread the word, which is why MAYON was able to stay in possession of her goods, in her car, and filmed the entire “sweep”. She went to court within five days, having written the motion for a TRO (i.e. that all sweeps stop throughout the City while the COVID order was in place. Also there was a request to show order as to why the City had not provided water and toilets to the beach encampment of over thirty people who refused to move into the Moscone Center during a raging, deadly pandemic.

12. During and after the 2020 pro se filing, MAYON's legal work, narrative, and court filings were publicly accessible and known personally to Defendants: COH and FRIEDENBACH.

13. In February 2021, Plaintiff authored a first-person narrative essay detailing her experiences as an RV dweller and her advocacy for safe, vehicle-based housing solutions. The essay specifically described her hunger strike as a form of protest to demand these rights and services, as well as the 2020 per se litigation she began against San Francisco's Dept of Homelessness ("the Dept.") which was published in the Street Sheet newspaper operated by Defendant COALITION ON HOMELESSNESS ("COH"). For this publication, Defendant COH paid Plaintiff MAYON \$60, establishing a limited contractual relationship. Through this transaction, Defendants FRIEDENBACH and the COH gained direct, firsthand knowledge of Plaintiff's accurate narrative, her advocacy focus, and her specific circumstances, as told in her own words.

14. February 2021: A staffer from a law firm associated with this case (i.e. LCCRSF), contacted Plaintiff MAYON to make a \$500 "private donation" towards repairs of her broken down RV. This established an initial, direct point of contact with the litigation side of the operation she didn't know she was going to be made part of a year-and-half later.

15. Summer 2022: Plaintiff MAYON received (but ignored) multiple texts/calls from a "legal-sounding" source asking about her experiences with encampment sweeps. It targeted outreach to gather testimonies or evidence specifically related to the lawsuit's subject matter.

16. August 9, 2022 Plaintiff MAYON was forced (under threat of her RV being seized and towed by SFPD) to move into the "safe parking program".

17. Despite this dual role of Defendant FRIEDENBACH — and her unique knowledge of the horrific conditions at the facility from Plaintiff's own public complaints in the media and grievance to the Homeless Oversight Commission and her 2024 pro se litigation — Defendant FRIEDENBACH never personally contacted Plaintiff MAYON. Instead, she engaged in a pattern of surveillance and management-through-proxy. Throughout Plaintiff's tenure at the facility, staff members of Defendant COH repeatedly appeared at her RV unannounced or contacted her through her email. These interactions were never to provide aid or investigate her well-being, but to monitor her advocacy and, upon information and belief, to co-opt her legitimate outrage for their own institutional purposes. This is evidenced by their visible enthusiasm whenever Plaintiff MAYON suggested disruptive protest tactics, such an occupation, as opposed to dead silence in addressing her core complaints about the Dept's malfeasance.

18. This pattern demonstrates that the Coalition viewed Plaintiff not as a rights-bearing individual to be helped, but as a character in a narrative they sought to control—a narrative they distorted for their litigation in *Coalition on Homelessness v. City of San Francisco*, while simultaneously failing to use their oversight power to alleviate the very real suffering that narrative was based on.

UNAUTHORIZED MISAPPROPRIATION, FRAUD, AND RIGHT TO PUBLICITY

19. Defendants' FRIEDENBACH and COH's subsequent unauthorized use and deliberate misrepresentation of Plaintiff MAYON's story in their litigation *Coalition for Homelessness v. City and County of San Francisco* was therefore not a product of mere negligence or mistake. It was a knowing and willful decision to disregard the true story they had previously paid to publish, and to replace it with a falsified narrative that better served their litigation objectives.

20. On or about September 27, 2022, Defendants ACLU and LLCRSF assisted the Defendant COH, under the direction of Defendant FRIEDENBACH, with the filing of said complaint that knowingly and without Plaintiff MAYON's consent, did appropriate her personal story for use in their litigation against the City and County of San Francisco.

21. These Defendants (COH, FRIEDENBACH, ACLU, and LLCRSF) deliberately distorted Plaintiff MAYON's story, falsely alleging she had "lost everything" and received "No notice, written or verbal" despite their knowledge—gained from the paid essay and public court records—these assertions were materially false.

22. Plaintiff MAYON was identifiable in these filings through unique descriptive references and a direct quote from a City official that was tied exclusively to her 2020 pro se litigation. She was called an “unhoused person”, as if that somehow disguised where the statement came from. It shows the Defendants COH and ACLU and LLCRSF didn't just use her story; they distorted her identity and beliefs to serve their own narrative.

23. Upon discovering the unauthorized use and subsequent misrepresentations approximately three years ago, on Oct 8, 2022, Plaintiff MAYON, an impoverished individual (at the time on hospice) disabled on SSI, was intimidated by the prospect of engaging in legal warfare with the ACLU and LLCRSF, who are large, well-funded organizations with immense legal resources. MAYON reasonably feared that any challenge would be met with overwhelming legal force and potentially used to further discredit her.

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3 24. The recent settlement of the underlying case, finalized on or about Sept 7, 2025, served as
4 the definitive event demonstrating that the false narratives about MAYON had been permanently
5 embedded into the legal record without correction. This settlement, based in part on the
6 mischaracterization of MAYON's story, crystallized the harm and eliminated any hope that the
7 record would be set right without judicial intervention. It constituted a final, public republication
8 of the falsehoods.

9 25. Plaintiff MAYON suffered the violation of her proprietary interest in her own legal work.
10 The right to petition does not include a right to commit fraud or steal intellectual property. Their
11 use was for litigation advantage, not core political speech. Furthermore, knowingly false speech
12 is not protected by the First Amendment. This misappropriation was not for core political speech
13 but for tactical litigation advantage, intended to secure favorable rulings and, ultimately, attorney
14 fees.

15 **INTERLOCKING RELATIONSHIPS AND CONFLICT OF INTEREST**

16 26. At all relevant times, and to this current day, Defendant FRIEDENBACH (Executive
17 Director of COH) and from 2020 until April of 2022 Defendant MILLER (CEO of Defendant
18 URBAN ALCHEMY) served together on the "Our City Our Home" (OCOH) Oversight
19 Committee, a public body that influences the allocation of hundreds of millions of dollars in
20 funding for homelessness services, including where Plaintiff MAYON resided from Aug 9, 2022
21 until March 3, 2025: the "safe parking program" called the "Vehicle Triage Center" located at
22 500 Hunters Point Expressway in the Bayview neighborhood of San Francisco.

23 27. Upon information and belief, shortly before filing the underlying 2022 litigation that
24 Plaintiff MAYON objects to being unscrupulously added to as paragraph #227, the OCOH
25 committee awarded a \$250,000 sole-source grant to Defendant FRIEDENBACH's organization,
26 Defendant COH. Likewise, Defendant MILLER also had a financial interest in the millions in
27 dollars in funding being awarded to her own company, Defendant URBAN ALCHEMY. These
28 two Defendants sat on the same sub-committee that oversaw "shelters and Navigation Centers",
therefore the funding (as well as the conditions) of the "safe parking program", where Plaintiff
MAYON resided, was under their purview. This created a direct financial conflict of interest
because Defendant FRIEDENBACH used OCOH funds to increase the prestige and litigational
footprint of Defendant COH by suing the City and that litigation contained Plaintiff MAYON's
usurped and now altered legal narrative, bent to serve the Defendant FRIENDBACH's agenda.

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3 28. This grant, occurring contemporaneously with the development of the legal strategy for the
4 Underlying Litigation, created a direct and substantial financial incentive for Defendants
5 FRIEDENBACH and COH to file and aggressively pursue the lawsuit. The success of the
6 litigation would directly justify the continued funding of their organization. This financial
7 conflict of interest provides critical context for the Defendants' subsequent conduct. The
8 misappropriation and deliberate misrepresentation of Plaintiff MAYON's story was not
9 accidental; they were tactical acts taken to bolster a high-stakes lawsuit that served the direct
10 financial and institutional interests of Defendants FRIEDENBACH and COH.

11 28. Defendant FRIEDENBACH, while acting in a fiduciary capacity as a member of the public
12 OCOH Oversight Committee, engaged in self-dealing by facilitating a grant to her own
13 organization and then using the litigation that grant supported, to misappropriate Plaintiff's story
14 while she, the Plaintiff, was suffering at the very location that the sub-committee was empowered
15 to observe and control. This constitutes a breach of her fiduciary duty to the public and
16 demonstrates a pattern of exploiting her position for institutional gain, with a callous disregard
17 for the rights of vulnerable individuals like Plaintiff MAYON.

18 29. Further demonstrating the interconnected nature of these Defendants, in April 2022, right as
19 Defendant MILLER stepped down from the OCOH oversight committee (she served a full
20 two-year term) she hired, the City's former Director of Homelessness, whose declaration was
21 misappropriated by Defendants COH, FRIEDENBACH, ACLU and LCCRSF, in their lawsuit
22 against the City, was hired by Defendant URBAN ALCHEMY as the executive in charge of their
23 growth nationwide.

24 30. The sworn statement in Plaintiff MAYON's pro se lawsuit in 2020 which was later
25 misappropriated and mischaracterized by Defendants ACLU and JENNIFER FRIEDENBACH,
26 originated from Jeff Kowisky, then Director of San Francisco Department of Homelessness and
27 Supportive Housing, but by April 2022, he had been hired as "Growth Director" at Urban
28 Alchemy (so that would be without the usual one-year waiting period required of city
employees).

31. Shortly after making this statement, KOWISKY left his public office and assumed a
position as "Growth Director" at URBAN ALCHEMY.

32. In August 2022, MAYON was placed in Urban Alchemy's "safe parking" facility. During
her tenancy, she was subject to a pattern of retaliation and hostile environment by Defendant
URBAN ALCHEMY, partially documented in a HUD complaint.

33. Key is that there was an active knowledge on part of all the Defendants of Plaintiff MAYON 's hostile living situation, due to significant media coverage portraying Plaintiff as a tenant union organizer advocating for better conditions. Despite this knowledge, and while serving in an oversight capacity for the facility's funding, Defendant FRIEDENBACH, through her high-profile litigation, continued to misuse Plaintiff MAYON's story and falsely portray her legal experience.

The Retaliatory Harm: Defamation/ Libel

34. During her tenancy, Plaintiff MAYON organized a tenants' union in 2023 and then in 2024, she filed (another) pro se lawsuit over the foul conditions.

35. By the fall of 2024, HUD had filed several complaints, including one for MAYON (filed Oct 1, 2024) alleging she was treated in a retaliatory manner after reporting to them with a film supporting the efforts of another "safe parking program" resident, a woman in a wheelchair attempting to get ramps to the communal areas, like picnic tables and the dog run, as well as a safe ADA-compliant shower. That case number is attached as an exhibit. MAYON is informed and believes there were other cases that HUD was investigating and this was another reason that put pressure on the Dept, leading to the closure of the "safe parking program".

36. On or about December 13, 2024, following positive media attention by way of two first place awards December 4, 2024 from the San Francisco Press Club for the journalist who wrote a (digital) investigative reporting series on the "safe parking program" as well as a (digital) profile featuring Plaintiff MAYON's lifestyle as an ethnic gypsyTraveller and her books about it, an "anonymous" URBAN ALCHEMY staffer made false and defamatory statements about Plaintiff MAYON and the other union members (all named) to the SF Standard newspaper (most popular progressive newspaper in San Francisco), calling them "leeches," "squatters," and "entitled troublemakers."

37. This defamatory article was published as a direct act of retaliation, intended to discredit Plaintiff MAYON and chill her protected speech. These statements are defamatory per se. As a direct and proximate result of Defendant URBANY ALCHEMY's retaliatory conduct, Plaintiff MAYON has suffered significant harm, including damage to her reputation, severe emotional distress, and increased anxiety and fear. The retaliatory libel was specifically designed to undermine her credibility as an advocate and organizer, and cause her reputation harm.

38. Also telling of the pressure Plaintiff MAYON has been forced to endure due to her advocacy (and legal) work exposing the deplorable conditions at the “safe parking program”, on Dec, 5, 2024 the day after the journalist won the aforementioned (two) first-place prizes at the SF Press Club, the Dept sent out written notice of the cessation of “safe parking program in 90 days” in spite of ten months left on the current lease with State Park and Rec.

39. It is of note, that the San Francisco Chronicle quoted the City’s own budget analyst saying that the “safe parking program” (a.k.a. “Vehicle Triage Center”) was “the most expensive homeless solution” produced by the Dept coming in at \$400 per RV per night. Again, overseen by defendant FRIEDENBACH who was on (and still is) on the sub-committee overseeing this dangerous internment camp (as MAYON was quoted in the prize-winning series calling it to be, with proof in hand, with defendant MILLER no longer on the subcommittee as of April 2022, and defendant URBAN ALCHEMY being the one who made “safe parking” so miserable for \$400 a night per RV. Dozens of grievances ignored. The media ignored. HUD ignored. MAYON’s 2024 litigation ignored. All the while defendants continue on their merry way ignoring the painful way people were living (well, one died, actually) all the while, republishing these misrepresentations about MAYON.

CRYSTALLIZATION OF INJURY

40. The recent settlement of the federal lawsuit featuring Plaintiff MAYON as paragraph #227, titled *Coalition on Homelessness v. City and County of San Francisco*, finalized on or about September 7, 2025, permanently embedded the false narratives about Plaintiff MAYON into the legal record without correction. This settlement, which secured millions in attorney fees for Defendants, served as a final, public republication of the falsehoods and eliminated any hope of self-correction.

41. The use of MAYON’s work was not solely for litigation, but formed part of Defendants’ promotional and fundraising materials for their interconnected organizations, as it went on continuously, without cessation, to being part and parcel of their advocacy work, and led no doubt, to it (the misrepresentation) being read (i.e. the COH filings) all around the country by most every homelessness advocacy groups hoping to learn how to litigate.

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3 **STATUTE OF LIMITATIONS**

4 42. Cause of Action "Right to Publicity" SOL IS based on the re-publication of the offending
5 materials by way of a settlement approved by SF Board of Supervisors on Sept 7, 2025. SOL is
6 one year.

7 43. Fraud's SOL is three years from the date of discovery which Plaintiff MAYON can show
8 to be Oct 9, 2022 by way of an email she sent to her assigned case manager at the "safe parking
9 program" on Oct 10, 2022 complaining about having first read the Defendant COH's complaint
and discovered herself in it.

10 44. Unfair Business Practices SOL is four years.

11 45. Libel's SOL is one year. The offending publication was Dec 13, 2024.

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13 46. IIED statute of limitation is two years. It has been cumulative, with the final point of
14 injury being the settlement of the underlying lawsuit on Sept 7, 2025.

15 **FIRST CAUSE OF ACTION**

16 **FRAUD**

17 (Cal.Civ. Proc. Code § 338(d))

18 47. Plaintiff realleges and incorporates by reference paragraphs 1-47 as though fully set forth
19 herein.

20 48. Defendants FRIEDENBACH, COH, ACLU, and LCCRSF falsely asserted statements on
21 behalf of MAYON (who never asked to be in their lawsuit) and these are not vague opinions but
22 specific, factual assertions that can be proven true or false. Alleging MAYON "lost everything"
23 when she did not lose a single possession, and stating "NO notice" was given when her own
litigation acknowledges verbal notice, are clear contradictions.

24 49. Defendants knew these statements were false because they had previously paid for and
25 published Plaintiff's accurate account and were aware of her pro se litigation.

26 50. The misrepresentations were made with the intent to induce reliance by the court and the
27 public to secure a favorable litigation outcome and financial benefit for Defendants.

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4 51. The court and public reasonably relied on these false statements. As a direct and proximate
5 result of this fraud, Plaintiff MAYON has suffered damages, including reputational harm,
6 emotional distress, and the violation of her proprietary legal interests.

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8 **SECOND CAUSE OF ACTION**
9 **RIGHT OF PUBLICITY**
10 **(Cal.Civ. Code § 3344)**

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12 52. Plaintiff realleges and incorporates by reference paragraphs 1-51 as though fully set forth
13 herein.

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15 53. Defendants COH, FRIEDENBACH, ACLU, and LCCRSF knowingly used Plaintiff
16 MAYON's personal identity—in the form of her identifiable narrative and unique
17 experiences—for their direct commercial and strategic advantage in litigation and related
18 advocacy. This use was without Plaintiff MAYON's consent.

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20 54. These statements were material misrepresentations that could be proven false and were
21 made with knowledge of their falsity or reckless disregard for the truth. Plaintiff was identifiable
22 by unique descriptive references and quotations tied to her litigation and personal circumstances,
23 despite not being named. This is because the exact same city attorney's office was forced to deal
24 with me in 2020-21 filings, in which the statement used by Defendants in their 2022-25 lawsuit
25 was a clear and exact quote from the Declaration made by the City's then-head of the Dept of
26 Homelessness and Supportive Housing ("the Dept"). It was unmistakable to them who the
27 "unhoused" person was in paragraph #227.

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55. Plaintiff MAYON is identifiable (to certain parties — the one she is directly involved with:
the City Attorney's office, due to the forming of the tenant union October 2023 and second set of
pro se filing January 2024. The Defendant COH's use of a direct quote from a government
official that is linked to her specific pro se litigation makes her identifiable to a relevant
community (the court, the parties involved in the case, the city). Legal causes of action for
misrepresentation or right of publicity often turn on whether a person is "identifiable," not strictly
on whether their full name is used, thus the core issue of misrepresentation is control over one's
identity. It's not just about the factual inaccuracies; it's about the false affiliation and ideological
hijacking of her story and her own legal aspirations. Seeing herself included - yet distorted - in
the COH lawsuit chilled her speech, because she knew she now had to carry the extra baggage of

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3 a false association with Defendant FRIEDENBACH which did not exist, yet all involved would
4 certainly think so just seeing paragraph #227.

5 56. This unauthorized use has caused Plaintiff MAYON compensable injury, including damage
6 to her reputation as an independent advocate, loss of control over her identity, emotional distress,
7 and the false and offensive affiliation with an organization whose methods she opposes.

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9 **THIRD CAUSE OF ACTION**
UNFAIR BUSINESS PRACTICES
(Bus.& Prof. Code § 17200)

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11 57. Plaintiff realleges and incorporates by reference paragraphs 1-56 as though fully set forth
12 herein.

13 58. This conduct—soliciting, paying for, and publishing a person's authentic story, only to later
14 misappropriate and distort that same story for institutional gain—constitutes a fraudulent business
15 practice and a breach of the limited license granted for the original publication.

16 59. The acts and practices described above, including the fraudulent misappropriation of
17 Plaintiff's story (after they entered into a transitional relationship by the purchase of publishing
18 rights to her February 2021 essay for \$60) were practices designed to, and did secure, an unfair
19 competitive and financial advantage for Defendants, harming Plaintiff MAYON and the public
20 generally.

21 **FOURTH CAUSE OF ACTION**
DEFAMATION/LIBEL
(Cal.Civ. Code § 45)

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23 60. Plaintiff realleges and incorporates by reference paragraphs 1-59 as though fully set forth
24 herein.

25 61. On or about December 13, 2024, Defendant URBAN ALCHEMY, through its agents and/or
26 employees, published false and defamatory statements of fact about Plaintiff to the SF Standard,
27 identifying her and her fellow union members (all named) as a “leeches,” “squatters,” and
28 “entitled troublemakers.”

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3 62. Upon information and belief, these statements were authorized or ratified by URBAN
4 ALCHEMY management. The article itself does contain other statements by named URBAN
5 ALCHEMY staff, as well as the Dept brass, lending even more weight to the defamatory
6 statements.

7 63. These statements were defamatory on their face (defamatory per se), as they accused
8 Plaintiff of criminal conduct (“squatting”) and attacked her character in her profession as an
9 advocate and organizer. The libelous publication was made with malice and as a direct
10 retaliation for Plaintiff’s protected advocacy. As a direct result, Plaintiff has suffered damage to
11 her reputation, severe emotional distress, and has been subjected to a chilling effect on her
12 speech.

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FIFTH CAUSE OF ACTION
INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS
(California Code, Civil Code - CIV § 1708)

64. Plaintiff realleges and incorporates by reference paragraphs 1-63 though fully set forth herein.

65. Defendants’ conduct, as a whole—including the knowing misappropriation and distortion of
her life story, the retaliatory defamation, and the exploitation of their power over her living
situation—was extreme, outrageous, and conducted with reckless disregard for the probability of
causing Plaintiff severe emotional distress. Defendants were aware of Plaintiff’s vulnerable
status as an impoverished, disabled individual with advanced cancer.

66. As a direct and proximate result of this outrageous conduct, Plaintiff has suffered severe
emotional distress.

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3 **PRAYER FOR RELIEF**
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5 WHEREFORE, Plaintiff prays for judgment against Defendants, and each of them, as follows:

6 For general damages according to proof at trial; For special damages according to proof at trial;
7 For punitive damages, pursuant to California Civil Code § 3294, due to Defendants' despicable
8 conduct carried out with malice, oppression, and fraud; For injunctive relief prohibiting
9 Defendants from any further use of Plaintiff MAYON's identity, name, likeness, or personal
10 narrative; For costs of suit incurred herein; and For such other and further relief as the Court
11 deems just and proper.

12 Respectfully submitted,

13 DATED: October 8, 2025

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15 Ramona Mayon
16 Plaintiff, In Pro Per
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EXHIBIT LIST

- A) Proof of date of discovery of Fraud is in Oct 10, 2022 email to the Dept case mg
- B) Highlight where MAYON appears in the COH litigation as paragraph #227 on page 75
- C) Proof that the City settles with COH on Sept 7, 2025
- D) MAYON 2020 pro se litigation with proof of her statements highlighted
- E) Feb 2021 essay in COH's Street Sheet: I state there was notice/ I lost nothing highlighted
- F) Proof of offer to pay
- G) My hesitation to accept payment
- H) Proof \$60 was paid
- I) Photo proof MAYON took down her tent Nov 16, 2020
- J) Proof of blog entries for this time-frame @ www.ramona-mayon.com
- K) HUD claim filed Oct 1, 2024
- L) SF Standard article Dec 13, 2024
- M) Proof of Defendant Lena Miller on OCOH oversight committee
- N) Proof MAYON continues to litigate pro se on behalf of the unhoused June 3, 2025

TABLE OF AUTHORITIES

I. FRAUD

California Code, Code of Civil Procedure - CCP § 338

Within three years:

- (a) An action upon a liability created by statute, other than a penalty or forfeiture.
- (b) An action for trespass upon or injury to real property.
- (c)(1) An action for taking, detaining, or injuring goods or chattels, including an action for the specific recovery of personal property.
- (2) The cause of action in the case of theft, as described in Section 484 of the Penal Code, of an article of historical, interpretive, scientific, or artistic significance is not deemed to have accrued until the discovery of the whereabouts of the article by the aggrieved party, the aggrieved party's agent, or the law enforcement agency that originally investigated the theft.

II. RIGHT TO PUBLICITY

California Civil Code - CIV § 3344

- (a) Any person who knowingly uses another's name, voice, signature, photograph, or likeness, in any manner, on or in products, merchandise, or goods, or for purposes of advertising or selling, or soliciting purchases of, products, merchandise, goods or services, without such person's prior consent, or, in the case of a minor, the prior consent of his parent or legal guardian, shall be liable for any damages sustained by the person or persons injured as a result thereof. In addition, in any action brought under this section, the person who violated the section shall be liable to the injured party or parties in an amount equal to the greater of seven hundred fifty dollars (\$750) or the actual damages suffered by him or her as a result of the

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4 unauthorized use, and any profits from the unauthorized use that are attributable to the use and
5 are not taken into account in computing the actual damages. In establishing such profits, the
6 injured party or parties are required to present proof only of the gross revenue attributable to
7 such use, and the person who violated this section is required to prove his or her deductible
8 expenses. Punitive damages may also be awarded to the injured party or parties. The prevailing
9 party in any action under this section shall also be entitled to attorney's fees and costs.

10 **III. UNFAIR BUSINESS PRACTICES**

11 **California Code, Business and Professions Code - BPC § 17200**

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14 As used in this chapter, unfair competition shall mean and include any unlawful, unfair or
15 fraudulent business act or practice and unfair, deceptive, untrue or misleading advertising and any
16 act prohibited by Chapter 1 (commencing with Section 17500) of Part 3 of Division 7 of the
17 Business and Professions Code.

18 **IV. DEFAMATION/LIBEL**

19 **California Code, Civil Code CIV § 45**

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21 Libel is a false and unprivileged publication by writing, printing, picture, effigy, or other fixed
22 representation to the eye, which exposes any person to hatred, contempt, ridicule, or obloquy, or
23 which causes him to be shunned or avoided, or which has a tendency to injure him in his
24 occupation.

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3 **V. IIED**

4 **California Code, Civil Code - CIV § 1708**

5 Every person is bound, without contract, to abstain from injuring the person or property of
6 another, or infringing upon any of his or her rights. (re. IIED)
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10 This document was created by the Plaintiff Ramona Mayon who states the Word Count is 5204

11 I, RAMONA MAYON, declare that I am the Plaintiff in this action; that I have read this
12 Complaint and know the contents thereof; and that the same is true of my own knowledge, except
13 as to those matters which are alleged on information and belief, and as to those I believe it to be
14 true.
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18 Ramona Mayon

Dated Oct 8, 2025