	PLD-C-001
ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State	FOR COURT USE ONLY
CHARLES A. TWEEDY, SBN 096234 PARSHALL & TWEEDY, LLP	FILED
11341 Gold Express Drive, Suite 110	Superior Court Of California,
Gold River, CA 95670	Sacramento
TELEPHONE NO (916) 631-8388 FAX NO (Optional) (916) 631-	8188 Dennis Jones, Executive
E-MAIL ADDRESS (Optional)	Öfficer
ATTORNEY FOR (Name) Plaintiff MJB/Bixby Construction,	Inc. 12/17/2008
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Sacramento	
STREET ADDRESS 720 Ninth Street	pcrescenti
MAILING ADDRESS	By Deputy
city and zip code Sacramento, CA 95814	Case Number:
BRANCH NAME	34-2008-00029452-CL-BC-GDS
PLAINTIFF MJB/BIXBY CONSTRUCTION, INC.	74-4772-707-249 7-7 F- ウ ア- クカウ
DESCRIPTION TO THE PROPERTY OF	
DEFENDANT INTERNATIONAL CITIZENS' ALERT NETWORK	
X DOES 1 TO 10	
CONTRACT	
X COMPLAINT AMENDED COMPLAINT (Number):	
CROSS-COMPLAINT AMENDED CROSS-COMPLAINT (Numb	er):
Jurisdiction (check all that apply):	Department
ACTION IS A LIMITED CIVIL CASE	Assignments
Amount demanded does not exceed \$10,000	Case Management 45
X exceeds \$10,000, but does not exceed	\$25,000 Law and Motion 53
ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)	Minors Compromise 24
ACTION IS RECLASSIFIED by this amended complaint or cross-co	omplaint
from limited to unlimited	
from unlimited to limited	
1. Plaintiff* (name or names): MJB/BIXBY CONSTRUCTION, INC.	
alleges causes of action against defendant* (name or names): INTERN	ATIONAL CITIZENS' ALERT NETWORK
(hereinafter "ICAN")	
2. This pleading, including attachments and exhibits, consists of the following	number of pages:
3. a. Each plaintiff named above is a competent adult	
X except plaintiff (name): MJB/BIXBY CONSTRUCTION,	INC.
(1) X a corporation qualified to do business in California	
(2) an unincorporated entity (describe)	
(3) other (specify):	
b. Plaintiff (name):	
a has complied with the fictitious business name laws and is d	oing business under the fictitious name (specify).
b. X has complied with all licensing requirements as a licensed (specify): Contractor
The state of the s	
c. Information about additional plaintiffs who are not competent adult	ts is shown in Attachment 3c
a. Each defendant named above is a natural person	
X except defendant (name). ICAN except	pt defendant (name):
(A) []	The boson control of the form and the con-
(1) a business organization, form unknown (1)	a business organization, form unknown
(2) X a corporation (2) L	a corporation
(3) an unincorporated entity (describe):	an unincorporated entity (describe):
(A)	a public autitu /doc==th=1;
(4) a public entity (describe).	a public entity <i>(describe)</i> :
(5) ather (specify):	other (specify).
(o) L.,	and labourity.
* If this form is used as a cross-complaint, plaintiff means cross-complaint	T 1 Code of Civil Departure 6 405 40
Form Approved for Optional Use	POS Code of Civil Procedure, § 425 12

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SHORT TITLE MJB/BIXBY VS. INTERNATIONAL CITIZENS' ALERT NETWORK	CASE NUMBER
defendants and acted within the scope of that agency or employment	
6. This action is subject to Civil Code section 1812.10 Civil Code 7. This court is the proper court because a X a defendant entered into the contract here. b. a defendant lived here when the contract was entered into. c a defendant lives here now. d. X the contract was to be performed here e. X a defendant is a corporation or unincorporated association and its princip f. real property that is the subject of this action is located here. g. other (specify):	e section 2984.4. al place of business is here.
8. The following causes of action are attached and the statements above apply to ear more causes of action attached): X Breach of Contract X Common Counts Other (specify):	ch (each complaint must have one or
9. Other allegations:	
10. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equ a. X damages of: \$ 12,770.90 b interest on the damages (1) according to proof (2) X at the rate of (specify): 10.00 percent per year from (c. X attorney's fees (1) of: \$ (2) X according to proof. d. other (specify):	
11 X The paragraphs of this pleading alleged on information and belief are as follows: 4 Date December 15, 2008	ws (specify paragraph numbers):
CHARLES A. TWEEDY, SBN 096234 (TYPE OR PRINT NAME)	(SIGNATURE OF PLAINTIFF OR ATTORNEY)
(If you wish to verify this pleading, affix a verific	

SHORT TITLE MJB/BIXBY vs. INTERNATIONAL CITIZENS' ALERT NETWORK

CASE NUMBER

FIRST	CAUSE OF ACTION—Breach of Contract	
	CHMENT TO X Complaint Cross - Complaint	
	a separate cause of action form for each cause of action.)	
•	Plaintiff (name): MJB/BIXBY CONSTRUCTION, INC.	
	alleges that on or about (date): February 7, 2008 a written oral X other (specify): Written and Oral Contracts agreement was made between (name parties to agreement): MJB/BIXBY CONSTRUCTION, INC INTERNATIONAL CITIZENS' ALERT NETWORK A copy of the agreement is attached as Exhibit A, or The essential terms of the agreement are stated in Attachment BC-1 are as follows (so Plaintiff was to provide construction labor, materials and related services to Defendant for the installation of commercial kiosks as Defendant was to pay Plaintiff for such labor, materials and related	<i>pecify):</i> d nd
	On or about (dates) March 6, 2008 defendant breached the agreement by the acts specified in Attachment BC-2 X the following (specify): Defendant failed to pay Plaintiff as required by the Contr	
BC-3.	Plaintiff has performed all obligations to defendant except those obligations plaintiff was prevented or excused from performing.	
BC-4	Plaintiff suffered damages legally (proximately) caused by defendant's breach of the agreement as stated in Attachment BC-4 X as follows (specify): \$12,770.90	
BC-5.	X Plaintiff is entitled to attorney fees by an agreement or a statute of \$ x according to proof	,
BC-6.	X Other: Interest according to proof and costs of suit.	
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PLD-C-001(2) MJB/BIXBY vs. INTERNATIONAL CITIZENS' ALERT **CASE NUMBER** SHORT TITLE NETWORK **CAUSE OF ACTION—Common Counts** SECOND ATTACHMENT TO X Complaint Cross - Complaint (Use a separate cause of action form for each cause of action.) CC-1. Plaintiff (name): MJB/BIXBY CONSTRUCTION, INC. alleges that defendant (name): INTERNATIONAL CITIZENS' ALERT NETWORK became indebted to X plaintiff other (name) within the last four years (1) on an open book account for money due. (2) because an account was stated in writing by and between plaintiff and defendant in which it was agreed that defendant was indebted to plaintiff. b X within the last X two years four years (1) for money had and received by defendant for the use and benefit of plaintiff. (2) X for work, labor, services and materials rendered at the special instance and request of defendant and for which defendant promised to pay plaintiff X the sum of \$ 12,770.90 the reasonable value. (3) [1] for goods, wares, and merchandise sold and delivered to defendant and for which defendant promised to pay plaintiff the sum of \$ the reasonable value. for money lent by plaintiff to defendant at defendant's request for money paid, laid out, and expended to or for defendant at defendant's special instance and request. (6) other (specify): CC-2. \$ 12,770.90 , which is the reasonable value, is due and unpaid despite plaintiff's demand, plus prejudgment interest according to proof at the rate of 10.00 percent per year from (date) March 6, 2008 CC-3. X Plaintiff is entitled to attorney fees by an agreement or a statute X according to proof. CC-4. X Other: Cost of Suit

> Legal Solutions D Plus

Re: MJB/Bixby Construction, Inc. vs. International Citizens' Alert Network **VERIFICATION** I, Mark J. Bixby, declare: I am the President of MJB/Bixby Construction, Inc., the Plaintiff in the above-entitled action. I have read the foregoing Complaint, and know the contents thereof. The matters stated therein are true and correct of my own knowledge, except as to those matters that are stated on my information and belief, and as to those matters, I believe it to be true. I declare under penalty of perjury, that the foregoing is true and correct, and that this Verification was executed on this 15 day of Dec , 2008, at Saramento.