

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

DJCBP Corporation DBA Tier One Consulting, a California Corporation and David Ju, an individual

Plaintiff(s)

v.

CITY OF BALDWIN PARK, a municipality; ROBERT NACIONALES-TAFOYA, an individual; ANTHONY WILLOUGHBY, II, an individual; RICARDO PACHECO, an individual; (See Attachment #1)

Defendant(s)

Civil Action No. 2:23-cv-00384-CAS (PVCx)

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) City of Baldwin Park, a municipality 14403 Pacific Ave, Baldwin Park, CA 91706

Robert Nacionales-Tafoya 1626 W Chetney Dr, West Covina, CA 91790

(See Attachment #2)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

DAVID G. TORRES-SIEGRIST State Bar No. 220187 225 S. Lake Avenue, Suite 300 Pasadena, CA 91101 Phone: (626) 432-5460 Facsimile: (626) 446-8927 Email: dgts@icloud.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Kiry K. Gray CLERK OF COURT

Ed Likens



Signature of Clerk or Deputy Clerk

Date: 01/20/2023

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Civil Action No. 2:23-cv-00384-CAS (PVCx)

**PROOF OF SERVICE**

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* \_\_\_\_\_  
was received by me on *(date)* \_\_\_\_\_.

I personally served the summons on the individual at *(place)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I left the summons at the individual's residence or usual place of abode with *(name)* \_\_\_\_\_  
\_\_\_\_\_, a person of suitable age and discretion who resides there,  
on *(date)* \_\_\_\_\_, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* \_\_\_\_\_, who is  
designated by law to accept service of process on behalf of *(name of organization)* \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_; or

I returned the summons unexecuted because \_\_\_\_\_; or

Other *(specify)*:

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ 0 \_\_\_\_\_.

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc:

**Print**

**Save As...**

**Reset**

1 DAVID G. TORRES-SIEGRIST State Bar No. 220187  
2 **TORRES | SIEGRIST**  
3 225 S. Lake Avenue  
4 Suite 300  
5 Pasadena, CA 91101  
6 Phone: (626) 432-5460  
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8 *dgts@icloud.com*

9 **Attorneys for Plaintiffs, DJCBP CORPORATION DBA**  
10 **TIER ONE CONSULTING, a California Corporation and**  
11 **David Ju, an individual**

12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT**

14 DJCBP CORPORATION DBA TIER  
15 ONE CONSULTING, a California  
16 Corporation and David Ju, an  
17 individual

18 Plaintiffs,

19 vs.

20 CITY OF BALDWIN PARK, a  
21 municipality; ROBERT  
22 NACIONALES-TAFOYA, an  
23 individual; ANTHONY  
24 WILLOUGHBY, II, an individual;  
25 RICARDO PACHECO, an individual;  
26 ISAAC GALVAN, an individual;  
27 MANUEL LOZANO, an individual;  
28 LOURDES MORALES, an individual  
and Does 1-50

Defendants.

**Case No.:**

**COMPLAINT FOR DAMAGES**

1. **VIOLATIONS OF RACKETEER INFLUENCED CORRUPT ORGANIZATIONS ACT [RICO VIOLATIONS BASED ON BRIBERY, KICKBACKS, FRAUD AND CONSPIRACY];**
2. **INVERSE CONDEMNATION/ TAKING (U.S. CONST. 5<sup>TH</sup> AMEND.);**
3. **VIOLATIONS OF CIVIL RIGHTS [42 U.S.C. § 1983];**
4. **NEGLIGENCE;**
5. **FRAUD;**
6. **DECLARATORY RELIEF**

**DEMAND FOR JURY TRIAL**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

DJCBP Corporation, et al. v. City of Baldwin Park

ATTACHMENT #2 TO SUMMONS

Anthony Willoughby II  
6170 Canterbury Dr., Apt 220  
Culver City, CA 90230-7901

Ricardo Pacheco  
14846 Chevalier Ave.  
Baldwin Park, CA 91706

Isaac Galvan  
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Los Angeles, Ca 90023

Manual Lozano  
15378 Kenoak Dr.  
Baldwin Park, Ca 91706

Lourdes Morales  
14403 Pacific Ave.  
Baldwin Park, CA 91706