

Clerk stamps date here when form is filed.

FILED
 Superior Court of California
 County of Los Angeles
 JUN 01 2017
 Sherri R. Carter, Executive Officer/Clerk
 By [Signature] Deputy
Y. Husen

Fill in court name and street address:
 Superior Court of California, County of
**SUPERIOR COURT
 SOUTHWEST DISTRICT
 825 MAPLE AVENUE
 TORRANCE, CA 90503-5098**

Court fills in case number when form is filed.
 Case Number:
17TRR000009

Read *Can a Civil Harassment Restraining Order Help Me?* (form CH-100-INFO) before completing this form. Also fill out *Confidential CLETS Information* (form CLETS-001) with as much information as you know.

1 Person Seeking Protection

a. Your Full Name: R. Lewis Chapman, Jr. Age: 50
 Your Lawyer (if you have one for this case):
 Name: N/A State Bar No.: _____
 Firm Name: N/A

b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.):
 Address: 1007 N. Sepulveda Blvd. #129
 City: Manhattan Beach State: CA Zip: 90267
 Telephone: _____ Fax: N/A
 E-Mail Address: _____

2 Person From Whom Protection Is Sought

Full Name: Cynthia Lea Dunbar (aka Cynthia Roth) Age: 63
 Address (if known): 716 Paseo del Mar
 City: Palos Verdes Estates State: CA Zip: 90274

3 Additional Protected Persons

a. Are you asking for protection for any other family or household members? Yes No If yes, list them:

Full Name	Sex	Age	Lives with you?	How are they related to you?
<u>Jennifer Chapman</u>	<u>F</u>	<u>32</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<u>Wife</u>
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

Check here if there are more persons. Attach a sheet of paper and write "Attachment 3a—Additional Protected Persons" for a title. You may use form MC-025, Attachment.

b. Why do these people need protection? (Explain below):
 Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 3b—Why Others Need Protection" for a title.
Jennifer Chapman has been subjected to even worse harassment by Dunbar over a 3-year period than myself (her husband). As a result, she is suffering emotional injuries including periodic nightmares involving Dunbar stalking and chasing her - not materially dissimilar to the reality of Dunbar's harassment (see other MC-025 forms).

This is not a Court Order.

4 Relationship of Parties

How do you know the person in (2)? (Explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 4—Relationship of Parties" for a title.

Neighbor _____

5 Venue

Why are you filing in this county? (Check all that apply):

a. The person in (2) lives in this county.

b. I was harassed by the person in (2) in this county.

c. Other (specify): _____

6 Other Court Cases

a. Have you or any of the persons named in (3) been involved in another court case with the person in (2)?

Yes No If yes, check each kind of case and indicate where and when each was filed:

Kind of Case	Filed in (County/State)	Year Filed	Case Number (if known)
(1) <input type="checkbox"/> Civil Harassment	_____	_____	_____
(2) <input type="checkbox"/> Domestic Violence	_____	_____	_____
(3) <input type="checkbox"/> Divorce, Nullity, Legal Separation	_____	_____	_____
(4) <input type="checkbox"/> Paternity, Parentage, Child Custody	_____	_____	_____
(5) <input type="checkbox"/> Elder or Dependent Adult Abuse	_____	_____	_____
(6) <input type="checkbox"/> Eviction	_____	_____	_____
(7) <input type="checkbox"/> Guardianship	_____	_____	_____
(8) <input type="checkbox"/> Workplace Violence	_____	_____	_____
(9) <input type="checkbox"/> Small Claims	_____	_____	_____
(10) <input type="checkbox"/> Criminal	_____	_____	_____
(11) <input type="checkbox"/> Other (specify): _____	_____	_____	_____

b. Are there now any protective or restraining orders in effect relating to you or any of the persons in (3) and the person in (2)? No Yes If yes, attach a copy if you have one.

7 Description of Harassment

Harassment means violence or threats of violence against you, or a course of conduct that seriously alarmed, annoyed, or harassed you and caused you substantial emotional distress. A course of conduct is more than one act.

a. Tell the court about the last time the person in (2) harassed you.

(1) When did it happen? (provide date or estimated date): May 31, 2017

(2) Who else was there?

Nobody

This is not a Court Order.



(3) How did the person in (2) harass you? (Explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(3)—Describe Harassment" for a title.

(4) Did the person in (2) use or threaten to use a gun or any other weapon?

Yes No (If yes, explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(4)—Use of Weapons" for a title.

(5) Were you harmed or injured because of the harassment?

Yes No (If yes, explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7a(5)—Harm or Injury" for a title.

Emotional harm has been caused by Dunbar's repeated, unsolicited harassment of me and my wife over three years. I now am not even safe to do gardening in front of my house without her accosting me with the sole purpose of harassment. My family reasonably is afraid to be outside our home for fear of Dunbar traveling to our property to verbally attack either of us. My wife has begun having nightmares re Dunbar.

(6) Did the police come? Yes No

If yes, did they give you or the person in (2) an Emergency Protective Order? Yes No

If yes, the order protects (check all that apply):

a. Me b. The person in (2) c. The persons in (3)

Attach a copy of the order if you have one.

b. Has the person in (2) harassed you at other times?

Yes No (If yes, describe prior incidents and provide dates of harassment below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 7b—Previous Harassment" for a title.

This is not a Court Order.



SHORT TITLE:

Attachment 7a(3) - Describe Harassment

CASE NUMBER:

ATTACHMENT (Number): 1*(This Attachment may be used with any Judicial Council form.)*

Harassed While Minding My Own Business on Land in Front of My House: On May 31, 2017, at around 4:20 p.m., several hours into doing some yard work on land in front of my home's southwest border on Via Horcada, Dunbar determined to leave her own property on Paseo del Mar, walk 100 meters or so down Via Horcada to my property's southeast border, apparently with the sole purpose of harassing me. Harassing my wife over the last three years apparently was not enough. In perhaps the most illogical and perhaps delusional request I may ever have heard, Dunbar (again for emphasis unsolicited) walked from her property a long distance down to mine, began what evolved into a critical rant about me with, "You know. I leave you alone. Why don't you give me the same courtesy?" I responded by stating the obvious, "Doesn't seem like you are leaving me alone right now." Dunbar then replied, "No, no because I had to come and tell you that, really. I don't ever want to see you. I don't ever want to ..." I interrupted Dunbar, puzzled, and asked, "Then why are you coming over to me?" Dunbar then entered some kind of delusional state, replying falsely, "Because you came over and said something to me ..." I again had to correct her false statement, "I didn't come over. I've been sitting in the dirt the whole time." [Note: with no less than a five PVEPD officers investigating a burglary across the narrow street at this earlier time Dunbar falsely claimed I "came over and said something to her," any of them could confirm I didn't move off the dirt in front of my home]. Dunbar then changed her story quite materially, though still either delusional or deceitful: "I heard you say something to me. You know it and you said things to the neighbors and they told me." At this point, I'd had enough of Dunbar's crazy harassment and told her in no uncertain terms I'd heard enough. This led to very aggressive dialog from Dunbar, particularly frightening in its tone, pitch and delivery.

(If the item that this Attachment concerns is made under penalty of perjury, all statements in this Attachment are made under penalty of perjury.)

Page 1 of 1*(Add pages as required)*

SHORT TITLE:

Attachment 7b - Previous Harassment

CASE NUMBER:

ATTACHMENT (Number): 2*(This Attachment may be used with any Judicial Council form.)*

Harassment Date: July 4, 2014

Time: approximately Afternoon

Parties: JH (J. Hope; now J. Chapman) and Dunbar (Cynthia Lea Dunbar)

Background: In July 2014, in explicit written terms, I explained why my family had determined to cease all relationship/interaction with Dunbar. The following E-mail in that pursuit was sent to her in response to her own of that date:

From: R. L. Chapman, Jr.
 Sent: Friday, July 04, 2014 8:18 AM
 To: 'wifeycindy@aol.com'
 Subject: Response to Your Inquiry

Cindy,

No, everything is not good, and with you consistently being exposed at the nexus of the problem, I am certain you already knew that when you inquired. Certainly, new addition to our neighborhood and investor relations employee Rob Feller saw to that. Further, since you initiated this dialog, I will respond in full candor and explicitly.

In order for there to be neither miscommunication nor opportunity for you to distort the true facts, I am taking the time to put this in writing rather than communicate with you in person, my preferred method of dispute resolution. If you have the character and integrity to do so, you should forward this E-mail, in its entirety and un-redacted, to anyone to whom you feel the need or desire to "tell what happened." I am skeptical you will do so, instead crafting a version far more flattering to you and unflattering to me, forcing me to rectify such prospective situation by sharing this E-mail myself.

When I first moved into my new (and first) home here on Paseo del Mar, I assiduously took the time to get to know nearly all my new neighbors. I walked around and introduced myself to nearly everyone, from the Leslies to the Merrill's and all the way down to the Field's. This has not been done by any other, to my knowledge. For my first Christmas here in 2007, I tracked down and ordered from the Goodyear Corporation the still shot of Bluff Cove and our properties that Greg Geiger had informed me served as the background of that year's print campaign, delivering blown up posters of that shot to your family and a dozen others. To be fair, as something of an acquired taste, I recognize that my assertive and forthright approach to communication is not for everyone, but with time good people are drawn to it and those accustomed to violating either written or moral laws will avert it. That filtering approach, with the foundations of honesty, fairness and consequences as foundations, has served me very well, both professionally and personally, over my nearly five decades.

CONTINUED ...

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SHORT TITLE:

CASE NUMBER:

Attachment 7b - Previous Harassment

ATTACHMENT (Number): 2*(This Attachment may be used with any Judicial Council form.)*

CONTINUED ...

For years, relations with my new neighbors were quite healthy (excluding the shamelessly unrepentant penal and municipal law breaking Tehrani family). For Christmas 2010, nearly 40 neighbors and family members, including practically everyone up and down Via Horcada and upper Paseo del Mar besides yours, accepted my invitation to celebrate year-end at my private party at "Chappy Chinese" (as it's now affectionate called). Before and after that, I have been invited to join and socialize with Audrey Lowman and her crew next door, have been the only neighbor invited to the Sahrorian Christmas dinner in their home across the street every year, and enjoyed that same distinction at Mal Field's 80th birthday party in his home just a few months ago. When Jenny Anastassiou sadly passed away last year, her son Jimmy called me and told me I was the first neighbor he wanted to tell given our relationship (see was a truly loving lady). Dan Leslie, my other non-Tehrani next door neighbor for years, frequently walked un-invited "over the hedge" to hang out and discuss the market, politics or something mechanical/scientific. Though I miss his and Scott's presence (particularly given their replacement), Dan and I still keep in touch. Katina Torino, one of two neighbors having real-estate related disagreements next door with the Geiger's, kindly and recently invited me to be her doubles partner on her home tennis court. 101 year old Mrs. Rudd across the street from me, during her more lucid days, insisted I escort her to the German Festival in the park. Lastly and most relevantly, your own husband and I have enjoyed mutual respect and companionship, both on and off the tennis court. I could go on and add a few more examples of those who have not been "alienated by" (to use Rob Feller's words), but this will suffice for now.

However, soon after the McDannolds bought into the area, I began to hear from various neighbors that you inexplicably were casting aspersions my way. Whether it be including your family's invitation in every seasonal festivity at my home, sharing time together at your dinner table discussing intimate personal matters in both of our lives, or my taking Texas (and then Sierra) along with me for afternoon hikes, I struggled to discover what reason I could have given you to treat me with such disdain and disrespect. Those conflicts I had endured with the McDannold, Tehrani (and due to Trent's own choice in how to align himself the Merrill and Duncan families were related entirely to illegal, PVEPC prohibited, and/or unethical real-estate related behavior of their own initiation. Indeed, by early 2011, the McDannolds finally had finished fighting their other next-door neighbor Jim Duncan (in the only instance in City records of one of our neighbors feeling compelled to appeal a Planning Commission decision and obtaining its agreement that a plan was still excessively incompatible with the neighborhood).

I want to make one thing very clear. I never will apologize for reacting reasonably to protect the sanctity of my (and now Jenn's) home from those attempting to impair its peace or prosperity with selfish, inconsiderate motives of their own. Moreover, given that the PVE Police Department, Planning Commission and Homes Association have agreed with my stance on those neighbors' illicit or improper behavior, for you, Trent Merrill or anyone to impeach my own reactions thereto is unjustified and shameful.

CONTINUED ...

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SHORT TITLE:

Attachment 7b - Previous Harassment

CASE NUMBER:

ATTACHMENT (Number): 2*(This Attachment may be used with any Judicial Council form.)*

CONTINUED ...

When I heard direct and rumored versions of you saying horrible things about me, I only briefly was perturbed by them. This was due to my having heard from one neighbor that at that time in 2010, you had just been convicted of a drug-related felony and sentenced to jail time as a result (www.rn.ca.gov/public/rn312676.pdf). How anyone could not pity you, irrespective of what you had done to them, was beyond me. What a horrible month in jail and five months of home detention that must have been, and my heart was pained for you. Combining this with your problematic family situation, until this past week I was willing to forgive your blatant duplicity and ascribe it to turbulence derived from a lineage of deeply embedded psychological roots.

However, when Rob Feller undeniably acknowledged your being the source of (via the Geiger's as conduit) of perhaps the most horrible maligning of my character and reputation, enough was enough. My pity for you and my affection for your husband (in his most unenviable position) notwithstanding, I am lost for any logical reason to consider you a friend in any fashion. My interaction with the Geiger family perhaps totals five to ten minutes cumulatively over seven years – without your poisoning that well, I have injected nothing unpalatable directly into that relationship. Greg and Jackie don't know me at all, and I do not have any familiarity with them. The peak of my family interaction with the Geiger's is my complimenting Grant on his skateboarding skills some years ago in front of my driveway.

Really, Cindy, I am not sure what pleasure you derive from maligning me or other neighbors who have contributed positively to you. When to my face you falsely labeled as a "racist" Audrey Lowman - my dear friend, consistently faithful, and similarly damaged by our law breaking, mutually bordering neighbor Masoud Tehrani, I was appalled and obviously acted on moral obligation to alert her to this false claim. Thus, I suppose I should not have been surprised at the comfort with which you slander me to others, some of whom you incorrectly estimate will not then inform me of your actions – you knew I was close to Audrey Lowman but still maligned her without any apparent hesitation.

So, in conclusion, the extremely hurtful comments you made indirectly to Rob Feller were the final straw. I no longer can either ignore, or write off to your being sentenced to jail or a volatile family life, you damaging my reputation in my own neighborhood (if not a much wider radius). Just as I determined not to tolerate Ellen Vargas/Theodora's hurtful behavior toward the love of my life (Jennifer – perhaps the sweetest, most "lovely" to quote you, and least worthy of such disdainful actions of any human on Earth), I no longer will tolerate yours. Feel free to continue your unfair and unjustified smear campaign - misinform Lily Kaminskas of Tehrani-alleged, felonious actions falsely reported and 100% impossible of my doing. If you feel yet again the related need to attempt to entrap me in a false confession of those impossibly committed acts (and a list of others) via a series of text-message interrogatories, type away at your keypad to your satisfaction.

I, however, am done with your duplicity.

RLCjr

CONTINUED ...

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SHORT TITLE:

Attachment 7b - Previous Harassment

CASE NUMBER:

ATTACHMENT (Number): 2*(This Attachment may be used with any Judicial Council form.)*

CONTINUED ...

From: wifeycindy@aol.com [mailto:wifeycindy@aol.com]
 Sent: Thursday, July 03, 2014 5:23 PM
 To: R. L. Chapman, Jr.
 Subject:

hey, everything good? jennifer was her lovely self but i got the cold shoulder from you. perhaps i am just sensitive and if so sorry and all good.

cindy

HARASSMENT: Dunbar, having received the E-mail reprinted above, was driving south departing Via Horcada as Petitioner and JH had just entered Via Horcada to return home via the driveway on the north end cul-de-sac such street. Dunbar suddenly and wildly then maneuvered her vehicle into the middle of Via Horcada, using her car in an apparent attempt to block my car from returning home. I determined, given Dunbar's felony drug conviction and jail sentence and thus her possibly be DUI of opiates, to avoid a confrontation by driving partially off the paved road in order to circumvent her obstruction of the paved road. As I passed Dunbar, she screamed loudly, though I could not understand the words. Dunbar then conducted a multiple-point reversal turn of her car, thereafter wildly speeding northward on Via Horcada just in time to block our home's driveway gate from closing automatically behind our car. Fortunately, I was able to park our car in the garage and get the garage door down before Dunbar could enter my garage/home without invitation or permission. Dunbar then screamed at me through my garage door, "You don't have to send out that E-mail to everyone. I'll do it myself." As we departed the attached garage into the dwelling, we could hear Dunbar still screaming outside. Dunbar then continued her trespassing, encircling the perimeter of our home, peering into doors and windows, before leaving the property 5-10 minutes later.

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SHORT TITLE:

Attachment 7b - Previous Harassment

CASE NUMBER:

ATTACHMENT (Number): 2*(This Attachment may be used with any Judicial Council form.)*

Harassment Date: August 2014

Time: approximately Before Noon

Parties: JH (J. Hope; now J. Chapman) and Dunbar (Cynthia Lea Dunbar)

Harassment: As JH was returning home from a walk with her one-year old daughter on 600 block of Paseo del Mar, Dunbar, sighting JH walking uphill in the opposite direction, suddenly made an illegal U-Turn and then slowly and closely passed by JH/child, starting at JH through her passenger side window. Dunbar then made another illegal U-turn and proceeded down Paseo del Mar in her original direction.

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SHORT TITLE:

Attachment 7b - Previous Harassment

CASE NUMBER:

ATTACHMENT (Number): 2*(This Attachment may be used with any Judicial Council form.)*

Harassment Date: 11/04/2014

Time: approximately 8:00 - 8:30 a.m.

Parties: JH (J. Hope; now J. Chapman) and Dunbar (Cynthia Lea Dunbar)

Background: After JH had just entered on foot to Via Horcada, Dunbar backed out of her driveway at 716 Paseo del Mar half way onto Via Horcada, essentially impeding JH's walking path. JH ignored Dunbar walking around Dunbar's car just as Dunbar surprisingly exited her car that was parked now illegally into/obstructing Via Horcada.

Harassment: Dunbar then accosted JH. JH, having already made clear repeatedly in writing via Robert Chapman, that her/our family had determined not to engage in any relationship or interaction with Dunbar following her felony drug conviction (that included a jail sentence) and being declared a "public safety risk" by the State of California, responded, "Please don't talk to me." Dunbar then began to rant loudly, stating she had "lived here for over 30 years, has a lot of friends, and this is the first and only time she's had any issue with a neighbor." JH repeated, "Please don't talk to me. I have nothing to say to you." Dunbar replied, "I want you to take a look at it from the outside." JH then replied, "My fiance is a noble, honest man. Please, please leave us alone." JH, in fear that Dunbar may again follow JH into her property as Dunbar had in July 2014, then sprinted home to the safety of her gated home

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SHORT TITLE:

Attachment 7b - Previous Harassment

CASE NUMBER:

ATTACHMENT (Number): 2*(This Attachment may be used with any Judicial Council form.)*

Harassment Date: 02/03/2015

Time: approximately 3 p.m.

Parties: JH (J. Hope) and Dunbar (Cynthia Lea Dunbar)

Background: My extended family (fiance, 2-week old daughter, mother and father in law) was walking peacefully with our daughter in carriage away from our home's Via Horcada driveway.

Harassment: As we passed Dunbar's home on the Via Horcada/Paseo del Mar corner (the only way to leave our street as other end is cul-de-sac), with rationale I cannot fathom given our prior explicit instructions to her Dunbar approached our baby's carriage and attempted to engage us stating she wanted to "see the baby." As Dunbar's emotional and psychological (not to mention chemical) state is unpredictable, and Dunbar was declared a "public safety risk" by no less than the State of California, I desired to manage the risk to my child and accordingly responded with as polite a deflection as possible, stating, "We're not having her interact with anyone today." Dunbar replied by casting various aspersions about me (in front of my family) before directing her pejorative commentary about me to a child apparently named "Andrea." In the interest of not experiencing further harassment from Dunbar, particularly given the peaceful walk I was having w/ my family, I ignored Dunbar and continued walking.

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SHORT TITLE:

Attachment 7b - Previous Harassment

CASE NUMBER:

ATTACHMENT (Number): 2*(This Attachment may be used with any Judicial Council form.)*

Harassment Date: 05/21/2016

Time: approximately 9:45 am

Parties: JH (J. Hope; now J. Chapman) and Dunbar (Cynthia Lea Dunbar)

Background: As JH drove southwest down Via Horcada en route to Vons grocery store, Dunbar was walking alongside her home at 716 Paseo del Mar, but upon seeing JH appeared to run toward her driveway.

Harassment: JH parked in the Vons parking lot and then entered Vons to pick up various groceries for her young daughter. Within five minutes after entering Vons, JH was approached suddenly by Dunbar in Aisle # 9. Despite JH attempting to remain disengaged from Dunbar Dunbar persisted in loudly speaking at JH. As it appeared Dunbar would not cease harassing JH, JH turned around toward Dunbar and demanded, "Do not talk to me." Dunbar, however, continued talking at JH. JH then reiterated, "We've asked you not to talk to us." Dunbar responded that if I (RLCjr) didn't want Dunbar to talk to the family then I (RLCjr) could request that. JH then responded firmly, "I'm asking you. Do not talk to me." Dunbar replied that it was her "right" to talk to anyone to whom she wanted. JH, seeing the futility in trying to persuade Dunbar to cease her harassment, walked away.

Conclusion: JH at the time stated to Petitioner, "I felt very unsettled that Dunbar not only approached me after numerous demands that she no longer harass us, but also that she follows me outside of my home, including making sudden and seemingly motivated-to-harass me U-turns in her car when she sees me while I'm on a quiet walk through the neighborhood with my 16 month old daughter, parking her car in the middle of the street [my walking path] and thereafter getting out to approach me to talk negatively about my "husband," and now following me to the grocery store. Dunbar who is a convicted felon and was declared a public safety risk by the State, is a psychologically negative force in my life and I wish to have nothing to do with her. I hope that she can respect my wishes to spare her unwanted chatter, as I do not feel safe in her presence."

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Page 8 of 8*(Add pages as required)*

Check the orders you want.

8 Personal Conduct Orders

I ask the court to order the person in **(2)** not to do any of the following things to me or to any person to be protected listed in **(3)**:

- a. Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
- b. Contact the person, either directly or indirectly, in any way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by e-mail, by text message, by fax, or by other electronic means.

c. Other *specify*:

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 8c—Other Personal Conduct Orders," for a title.

The person in **(2)** will be ordered not to take any action to get the addresses or locations of any protected person unless the court finds good cause not to make the order.

9 Stay-Away Orders

a. I ask the court to order the person in **(2)** to stay at least 100 yards away from (check all that apply):

- (1) Me
- (2) The other persons listed in **(3)**
- (3) My home
- (4) My job or workplace
- (5) My school
- (6) My children's school
- (7) My children's place of child care
- (8) My vehicle
- (9) Other *(specify)*: _____

b. If the court orders the person in **(2)** to stay away from all the places listed above, will he or she still be able to get to his or her home, school, or job? Yes No (If no, explain below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 9b—Stay-Away Orders," for a title.

10 Guns or Other Firearms and Ammunition

Does the person in **(2)** own or possess any guns or other firearms? Yes No I don't know

If the judge grants a protective order, the person in **(2)** will be prohibited from owning, possessing, purchasing, receiving, or attempting to purchase or receive a gun, other firearm, and ammunition while the protective order is in effect. The person in **(2)** will also be ordered to turn in to law enforcement, or sell to or store with a licensed gun dealer, any guns or firearms within his or her immediate possession or control.

This is not a Court Order.



11 Immediate Orders

Do you want the court to make any of these orders now that will last until the hearing without notice to the person in ②? Yes No (If you answered yes, explain why below):

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 11—Immediate Orders" for a title.

Dunbar, a convicted drug-related felon, was declared a "public safety risk" by the State of California. As such, in combination with Dunbar's erratic, harassing behavior over three years, Dunbar is a true risk to Petitioner and his family at the present time. Dunbar, when in the past notified of Petitioner's family's request to stay away, has reacted aggressively by trespassing onto Petitioner's property while further engaging in disturbing, erratic behavior. As of May 31, 2017, Dunbar's harassment has escalated yet again.

12 Request to Give Less Than Five Days' Notice

You must have your papers personally served on the person in ② at least five days before the hearing, unless the court orders a shorter time for service. (Form CH-200-INFO explains What Is "Proof of Personal Service"? Form CH-200, Proof of Personal Service, may be used to show the court that the papers have been served.)

If you want there to be fewer than five days between service and the hearing, explain why below:

Check here if there is not enough space for your answer. Put your complete answer on the attached sheet of paper or form MC-025 and write "Attachment 12—Request to Give Less Than Five Days' Notice" for a title.

13 No Fee for Filing or Service

- a. There should be no filing fee because the person in ② has used or threatened to use violence against me, has stalked me, or has acted or spoken in some other way that makes me reasonably fear violence.
- b. The sheriff or marshal should serve (notify) the person in ② about the orders for free because my request for orders is based on unlawful violence, a credible threat of violence, or stalking.
- c. There should be no filing fee and the sheriff or marshal should serve the person in ② for free because I am entitled to a fee waiver. (You must complete and file form FW-001, Application for Waiver of Court Fees and Costs.)

14 Lawyer's Fees and Costs

I ask the court to order payment of my: a. Lawyer's fees b. Court costs

The amounts requested are:

<u>Item</u>	<u>Amount</u>	<u>Item</u>	<u>Amount</u>
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____

Check here if there are more items. Put the items and amounts on the attached sheet of paper or form MC-025 and write "Attachment 14—Lawyer's Fees and Costs" for a title.

This is not a Court Order.



Robert L. Chapman, Jr.

From: Robert L. Chapman, Jr.
Sent: Thursday, June 1, 2017 2:57 AM
To: 'dan@dunbarlaw.com'; 'dunbar@psblaw.com'
Subject: Harassment of Chapman Family: Cynthia Dunbar (California Public Safety Risk) Further Harassment

June 1, 2017

Mr. Daniel W. Dunbar
Panish Shea & Boyle LLP
11111 Santa Monica Blvd #700
Los Angeles, CA 90025
Phone: (310) 477-1700
E-mail 1: dan@dunbarlaw.com
E-mail 2: dunbar@psblaw.com

Dan,

Documentation Purpose. As you again have proven unwilling and/or incapable of influencing your wife, Cynthia Dunbar, in her determination to harass members of my family, this E-mail's purpose is to legally document yesterday afternoon's further harassment.

Harassed While Minding My Own Business on Land in Front of My House: Yesterday at around 4:20 p.m., several hours into doing some yard work on land in front of my house, your wife determined to leave her own property on Paseo del Mar, walk 100 meters or so down Via Horcada to my property, apparently with the sole purpose of harassing me. Harassing my wife over the last three years apparently was not enough (see below). In perhaps the most illogical and perhaps delusional request I may ever have heard, your wife, again who unsolicited walked from her property a long distance down to mine, began what evolved into a critical rant about me with, "You know. I leave you alone. Why don't you give me the same courtesy?" I responded by stating the obvious, "Doesn't seem like you are leaving me alone right now." Your wife then replied, "No, no because I had to come and tell you that, really. I don't ever want to see you. I don't ever want to ..." I interrupted her, puzzled, asking, "Why are you coming over to me?" Your wife then entered some kind of delusional state, replying falsely, "Because you came over and said something to me ..." I again had to interrupt her lunacy, correcting her false statement, "I didn't come over. I've been sitting in the dirt the whole time." [Note: with no less than a five PVEPD officers investigating the burglary across the street, any of them could confirm I didn't move off the dirt in front of my home]. Your wife then changed her story quite materially, though still either delusional or deceitful: "I heard you say something to me. You know it and you said things to the neighbors and they told me." At this point, I'd had enough of her crazy harassment and told her in no uncertain terms I'd heard enough of her insecure nonsense.

Your Influence: Clearly, presuming you have admonished her to leave me alone and stop harassing me or my wife, you have little to no influence over her behavior. Thus, I won't even bother requesting of you yet again to attempt to persuade her to end her unstable deportment vis-à-vis me and my family. Trust me, Dan, I really, really feel sorry for you. I cannot imagine what it must be like having to live with a convicted drug felon so prone to this kind of erratic, anti-social behavior. You are too nice of a guy to have to endure this kind of "life partner." With a sweet, loving, rational and stable wife of my own, I am especially empathetic as I have been so blessed with a wife of antithetical emotional stability.

Acknowledgement: Please simply reply acknowledging receipt of this E-mail so that I shall not have any need to discuss/E-mail it further with you.

RLCjr

From: Robert L. Chapman, Jr.
Sent: Sunday, September 25, 2016 9:10 AM
To: 'dan@dunbarlaw.com'; 'dunbar@psblaw.com'
Subject: Harassment of Chapman Family: Cynthia Dunbar Declared by State of California "Public Safety Risk"

September 25, 2016

Mr. Daniel W. Dunbar
Panish Shea & Boyle LLP
11111 Santa Monica Blvd #700
Los Angeles, CA 90025
Phone: (310) 477-1700
E-mail 1: dan@dunbarlaw.com
E-mail 2: dunbar@psblaw.com

Dan,

You and your family should be aware that *every time* I hear that someone has made false, pejorative claims about me relating to the conflict between my family and yours, and only when this occurs, my response is to defend my reputation by transmitting the E-mail string below. This has proven consistently eye opening to those made aware of the truth.

Last night such an event occurred, and I have responded accordingly. It would seem the best advice one could give is for you, your wife and others simply not to mention my name at all if doing so is accompanied by false and defamatory statements. If I don't hear of such false commentary about me or my family sourced from your family or related parties, I have little incentive to inform others of the true background, history and character of Cindy Dunbar or others sharing her family name. Essentially, we all coexist quietly with no overlap whatsoever, which has been my goal since this all turned south two years ago.

Though it is obvious from present outcomes that your influence on steering your family upward is less than firm, perhaps this little reminder will provide you with some incentive to find a way. I hope your niece's recent wedding celebration was a great success and you continue to flourish at PS&B.

RLCjr

From: Robert L. Chapman, Jr.
Sent: Sunday, September 25, 2016 8:52 AM
To: REDACTED
Subject: Harassment of Chapman Family: Cynthia Dunbar Declared by State of California "Public Safety Risk"

Before [redacted] casts me or anyone in any particular light, he should be made aware of the truth (i.e., the facts). I am very proud of my behavior in how I defended my wife's peace and safety. The facts substantiate that my response to Cindy Dunbar was proportionate to the threat she posed. I would have been "crazy" NOT to take these actions and thus leave my family at higher risk of harm by this unstable person.

The following is a basic summary. After I learned in mid-2014 of Cindy Dunbar's duplicitously and frequently casting aspersions about me (while acting like my friend to my face) and her having been **declared a public safety risk by the State following her being convicted of felony drug charges**, I determined to exclude her from any social or other interaction with me or my family. This rejection led to her erratic, dangerous

harassment of me and particularly my wife over multiple incidences. With few options available to me after Dan Dunbar failed to honor his commitment to “take care of it,” I determined to disseminate the complete set of facts via Email to the neighborhood and related parties in the hope that such social consequence would halt her offensive and harassing behavior (that is the part I suspect Dunbar wants to label as “crazy,” but in reality it was my reaction to the real “crazy”). So far (four months later), this consequence has proven impactful, as Cindy Dunbar has not harassed my wife over that period.

Start at the bottom and work your way up, and please feel very free to forward this Email with no modification to [redacted].

From: Robert L. Chapman, Jr.
Sent: Saturday, May 21, 2016 3:01 PM
To: 'Daniel Dunbar (dan@dandunbarlaw.com)'; 'Daniel W. Dunbar (dunbar@psblaw.com)'
Subject: Harassment of Chapman Family: Cynthia Dunbar Declared by State of California "Public Safety Risk"

May 21, 2016

Mr. Daniel W. Dunbar
Panish Shea & Boyle LLP
11111 Santa Monica Blvd #700
Los Angeles, CA 90025
Phone: (310) 477-1700
E-mail 1: dan@dunbarlaw.com
E-mail 2: dunbar@psblaw.com

Dan,

Documentation Purpose. As you have proven unwilling and/or incapable of influencing your wife, Cynthia Dunbar, in her determination to harass Jennifer Hope, this E-mail’s purpose is to legally document this morning’s further harassment (see final paragraph).

Cynthia Dunbar Was Declared a “Public Safety Risk” by the State of California on September 29, 2010 (see attached Acrobat page 12 of 17, or click [here](#)). As you are aware, your wife is a convicted felon, related to drug charges, and recently was sentenced to jail. The State of California determined her to be a “public safety risk.” These facts, combined with her erratic and unpredictable behavior, amongst other unfavorable exhibitions of character, have led my family, including Jennifer Hope, to make clear to her that her engagement with us in any fashion is absolutely unwanted. Please see July 4, 2014 E-mail below, supporting this contention.

Continued Harassment. Since that date in 2014, Cynthia Dunbar has persisted in harassing Jennifer Hope. Harassing behavior includes, but is not limited to, your wife’s abusive critical commentary about me verbalized both directly to me or Jennifer, or to third parties while they were in the immediate presence of both our family member(s) and such a third party. Her harassment also includes refusing to cease and desist in closely engaging Jennifer in unilateral dialog, as well as behavior that could be considered “stalking” (see below).

Harassment Defined. Cynthia Dunbar’s actions toward my family serve no legitimate purpose. Constituting illegal harassment, your wife has no legitimate need to engage or otherwise communicate to/about my family in our presence. Instead, her intent patently is to harass me and Jennifer. In no uncertain written terms (see below), she has been informed formally that we request/demand that she not engage us in any fashion. However, due to her clear desire to harass our family, Cynthia Dunbar has persisted to harass us *despite our initiating no interaction with her whatsoever.*

Today’s Harassment: 05/21/2016

Time: approximately 9:45 am

Parties: JCH (Jennifer Hope) and CLD (Cynthia Lea Dunbar)

Background: As JCH drove southwest down Via Horcada en route to Vons grocery store, CLD was walking alongside her home at 716 Paseo del Mar, but upon seeing JCH appeared to run toward her driveway.

Harassment: JCH parked in the Vons parking lot and then entered Vons to pick up various groceries for her young daughter. Within five minutes after entering Vons, JCH was approached suddenly by CLD in Aisle # 9. Despite JCH attempting to remain disengaged from CLD, CLD persisted in loudly speaking at JCH. As it appeared CLD would not cease harassing JCH, JCH turned around toward CLD and demanded, "Do not talk to me." CLD, however, continued talking at JCH. JCH then reiterated, "We've asked you not to talk to us." CLD responded that if I (RLCjr) didn't want CLD to talk to the family then I (RLCjr) could request that. JCH then responded firmly, "I'm asking you. Do not talk to me." CLD replied that it was her "right" to talk to anyone to whom she wanted. JCH, seeing the futility in trying to persuade CLD to cease her harassment, walked away.

Conclusion: Jennifer now states, "I felt very unsettled that CLD not only approached me after numerous demands that she no longer harass us, but also that she follows me outside of my home, including making sudden and seemingly motivated-to-harass me U-turns in her car when she sees me while I'm on a quiet walk through the neighborhood with my 16 month old daughter, parking her car in the middle of the street [my walking path] and thereafter getting out to approach me to talk negatively about my "husband," and now following me to the grocery store. CLD, who is a convicted felon and was declared a public safety risk by the State, is a psychologically negative force in my life and I wish to have nothing to do with her. I hope that she can respect my wishes to spare her unwanted chatter, as I do not feel safe in her presence."

Sincerely,

Robert L. Chapman, Jr.

Attachment: Dunbar Cynthia Felony Drug Conviction.pdf

From: Robert L. Chapman, Jr.
Sent: Thursday, May 5, 2016 9:30 AM
To: Daniel Dunbar (dan@dandunbarlaw.com); Daniel W. Dunbar (dunbar@psblaw.com)
Subject: Harassment of Chapman Family: Restraint of Cynthia Dunbar

May 5, 2016
9:30 a.m. PST

Mr. Daniel W. Dunbar
Panish Shea & Boyle LLP
11111 Santa Monica Blvd #700
Los Angeles, CA 90025
Phone: (310) 477-1700
E-mail 1: dan@dunbarlaw.com
E-mail 2: dunbar@psblaw.com

Dan,

On February 3, 2015, over one year ago, I wrote to you (see below), "This is the last time I beseech you to find a means of restraining your wife from any interaction with my family." However, in the spirit of giving her (and thus you) one truly final opportunity to avoid material consequences for her harassment, I called you this morning and am following up that call with this written correspondence.

Indeed, I appreciate your returning my multiple phone calls to you this morning regarding the continued, nearly two-year harassment of my family by your wife Cynthia Dunbar. That being said, just to avoid a claim to the contrary, should I not receive a reply E-mail acknowledging your receipt of this E-mail, I shall assume that you have determined tactically not to confirm receipt. Consequently, I shall be compelled to begin a process of implementing alternative means of forcing your wife to cease and desist her harassment.

During these past nearly two years, there has *not* been any 3-4 month period during which Jennifer and/or I have walked down our home street of Via Horcada without Cynthia Dunbar initiating harassing dialog with one/both of us. Essentially, on nearly every occasion where your wife had the opportunity to harass my family, she has done so. Harassing behavior includes, but is not limited to, your wife's abusive critical commentary about me verbalized both directly to me or Jennifer, or to third parties while they were in the immediate presence of both our family member(s) and such a third party. Overall, we desire and again formally demand absolutely no interaction initiated by Cynthia Dunbar with the Chapman family. This is a reasonable neighbor-to-neighbor relationship, as your wife has no legitimate need to engage or otherwise communicate to/about my family in our presence.

The reason for my repeated demand is that Cynthia Dunbar's actions toward my family serve no legitimate purpose. Instead, her intent patently is to harass me and Jennifer. In no uncertain written terms (see below), she has been informed formally that we request/demand that she not engage us in any fashion. However, due to her clear desire to harass our family, Cynthia Dunbar has persisted to harass us *despite our initiating no interaction with her whatsoever*.

Dan, this indeed is the very last time I ask you to intercede in this matter. I hereby acknowledge that you respond today during our conversation that you committed to take actions to cause your wife to cease interaction with my family. However, I vow to you that even one single future harassing action by Cynthia Dunbar toward any member of my family, which would prove beyond reasonable doubt that you are either unwilling or unable to thwart her harassment, will lead to an immediate legal and perhaps social consequence.

It is unfortunate that we have gotten to this point in our own relationship (that previously had including friendly tennis matches and other social enjoyment). However, I put my family's legal right not to be harassed by Cynthia Dunbar as a priority over other relationships such as yours/mine.

Sincerely,

Robert L. Chapman, Jr.

From: Robert L. Chapman, Jr.
Sent: Tuesday, February 3, 2015 4:44 PM
To: 'Daniel Dunbar (dan@dandunbarlaw.com)'; 'Daniel W. Dunbar (dunbar@psblaw.com)'
Subject: RE: Restraint of Cynthia Dunbar

Thanks, Dan. Trinity is a blessing beyond my highest hopes and expectations. I am a lucky man to have these two girls in my life.

I am sorry to have to be so formal with you regarding your wife (in addition to having no longer a friendship with you). Cindy truly is an unpredictable risk that I just cannot allow to play any part, however small, in my family's life. I appreciate all you can do to eliminate her apparent desire to engage us in any way.

From: Dan Dunbar [<mailto:dunbar@psblaw.com>]
Sent: Tuesday, February 03, 2015 4:38 PM
To: Robert L. Chapman, Jr.
Subject: RE: Restraint of Cynthia Dunbar

Message received. Congrats on baby.

Dan Dunbar - Attorney
Panish Shea & Boyle LLP
11111 Santa Monica Boulevard, Suite 700
Los Angeles, CA 90025
Tel: (310) 477-1700
Fax: (310) 477-1699
Email: dunbar@psblaw.com
Web: www.psblaw.com

Received: from p3plibsmtp03-02.prod.phx3.secureserver.net (68.178.213.114) by P3PWEX2HT001.ex2.secureserver.net (184.168.131.197) with Microsoft SMTP Server id 14.2.318.1; Tue, 3 Feb 2015 17:38:46 -0700

Received: from us-smtp-delivery-117.mimecast.com ([63.128.21.117]) by p3plibsmtp03-02.prod.phx3.secureserver.net with bizsmtp id o0e11p00m2XaAvz010emh7; Tue, 03 Feb 2015 17:38:47 -0700

Received: from LAMAIL-01.PSandB.local (rrcs-173-196-148-51.west.biz.rr.com [173.196.148.51]) (Using TLS) by us-mta-10.us.mimecast.lan; Tue, 03 Feb 2015 19:38:44 -0500

Received: from LAMAIL-01.PSandB.local (192.168.254.207) by LAMAIL-01.PSandB.local (192.168.254.207) with Microsoft SMTP Server (TLS) id 15.0.995.29; Tue, 3 Feb 2015 16:37:31 -0800

Received: from LAMAIL-01.PSandB.local ([fe80::14c8:c34c:24fc:be68]) by LAMAIL-01.PSandB.local ([fe80::14c8:c34c:24fc:be68%12]) with mapi id 15.00.0995.028; Tue, 3 Feb 2015 16:37:31 -0800

From: Dan Dunbar <dunbar@psblaw.com>

To: "Robert L. Chapman, Jr." <chapman@chapcap.com>

Subject: RE: Restraint of Cynthia Dunbar

Thread-Topic: Restraint of Cynthia Dunbar

Thread-Index: AdBAEjg7f/HkuB0kTJ2grxBnmua+PgAAH8sg

Date: Wed, 4 Feb 2015 00:37:31 +0000

Message-ID: <e97c80b5a20341b2b800de00d58d1fbf@LAMAIL-01.PSandB.local>

References: <DCE410BF82D7424A99455E0D29908C4D01ADCB70@P3PWEX2MB003.ex2.secureserver.net>

In-Reply-To: <DCE410BF82D7424A99455E0D29908C4D01ADCB70@P3PWEX2MB003.ex2.secureserver.net>

Accept-Language: en-US

Content-Language: en-US

X-MS-Has-Attach:

X-MS-TNEF-Correlator:

x-originating-ip: [192.168.254.78]

MIME-Version: 1.0

X-MC-Unique: 5S4G94piQ46btMoUjBDxBw-1

Content-Type: multipart/alternative;

boundary=" _000_e97c80b5a20341b2b800de00d58d1fbfLAMAIL01PSandBlocal_ "

Return-Path: dunbar@psblaw.com

X-MS-Exchange-Organization-AuthSource: P3PWEX2HT001.ex2.secureserver.net

X-MS-Exchange-Organization-AuthAs: Anonymous

From: Robert L. Chapman, Jr.

Sent: Tuesday, February 03, 2015 4:34 PM

To: 'Daniel Dunbar (dan@dandunbarlaw.com)'; 'Daniel W. Dunbar (dunbar@psblaw.com)'

Subject: Restraint of Cynthia Dunbar

February 3, 2015

Dan,

Though you either disregarded or disrespected my July 4, 2014 E-mail message to you below (based on not even a perfunctory response from you), I am sending this message to you purely out of self interest in the hope that you can find a way to restrain your wife from interacting with any member of my family. I recommend that you, at a minimum, show me the smallest sign of regard for my status a victim to some extent of your wife's apparent mental instability, and at least reply to this E-mail. Though it would be entirely appropriate for you to apologize on behalf of your wife, it seems that does not match either your character or desire to survive what may be the unfathomable matrimonial wrath you could endure should you do so.

In July 2014, in explicit terms, I explained why I was “done” with your wife (see below). On the date of my doing so, your wife, after using her car to attempt to block my car from returning home on Via Horcada, wildly sped down the street, entered my property without invitation or permission, screamed at me through my garage door, and then circled the perimeter of my home, peering into doors and windows, before leaving the property. Weeks later, upon seeing Jennifer (my fiancé) walking alone down Paseo del Mar at the 500/600 block intersection, your wife made a screeching illegal U-turn in order to drive slowly alongside Jennifer and attempt to stare her down. As if this was not erratic behavior enough, on November 4, 2014, your wife stopped her car half way down your driveway into Via Horcada, exited her car, and proceeded to accost Jennifer. Despite Jennifer explicitly responding, “I have nothing to say to you”, your wife continued walking behind a slowly (since pregnant) fleeing target. One would think that the combination of my explicit July 4, 2014 E-mail below with Jennifer’s explicit statement of no interest in interaction would have led to your wife resisting any urge to interact with my family. Yet, this has not been sufficient it seems.

Today at around 3:00 p.m., my extended family was walking peacefully with our daughter in carriage away from our home on Via Horcada. As we passed your home, with rationale I cannot fathom given our prior explicit instructions to her, your wife approached our baby’s carriage and attempted to engage us in order to “see the baby.” As your wife’s emotional and psychological (not to mention chemical) state is unpredictable, and she was declared a “public safety risk” by no less than the state of California, I desired to manage the risk to my child and accordingly responded with as polite a deflection as possible, stating, “We’re not having her interact with anyone today.” As I am certain you will not be surprised to learn, your wife replied by casting various aspersions about me (in front of my family) before directing her pejorative commentary about me to a child apparently named “Andrea.” In the interest of not “disturbing the beast,” particularly given the peaceful walk I was having w/ my family, I ignored your wife and continued walking.

This is the last time I beseech you to find a means of restraining your wife from any interaction with my family. Moreover, I encourage you to guide her to the wisdom of not mentioning my name in a slanderous manner to another person. The consequences of her taking either of these actions shall be serious.

Respectfully,

Robert L. Chapman, Jr.

From: Robert L. Chapman, Jr.
Sent: Friday, July 04, 2014 8:22 AM
To: Daniel Dunbar (dan@dandunbarlaw.com) (dan@dandunbarlaw.com)
Subject: Cindy's Inquiry

Out of respect for you, I am forwarding this E-mail to you and (outside Jenn) only to you. You should be aware of the self-restraint I have exhibited for years now, but can no longer tolerate.

I have little doubt that matrimonial ties are stronger than any I could have built with you over the past seven years. As such, I understand if we no longer interact beyond the occasional wave and smile. Though not my preference, I cannot imagine the pain and suffering you would endure should you be deemed to be friends with “the enemy.”

Sorry, my friend, but Feller’s comments were the final straw. There is only so much pity and understanding one man can have.

From: Robert L. Chapman, Jr.
Sent: Friday, July 04, 2014 8:18 AM
To: 'wifeycindy@aol.com'
Subject: Response to Your Inquiry

Cindy,

No, everything is not good, and with you consistently being exposed at the nexus of the problem, I am certain you already knew that when you inquired. Certainly, new addition to our neighborhood and investor relations

employee Rob Feller saw to that. Further, since you initiated this dialog, I will respond in full candor and explicitly.

In order for there to be neither miscommunication nor opportunity for you to distort the true facts, I am taking the time to put this in writing rather than communicate with you in person, my preferred method of dispute resolution. If you have the character and integrity to do so, you should forward this E-mail, in its entirety and un-redacted, to anyone to whom you feel the need or desire to “tell what happened.” I am skeptical you will do so, instead crafting a version far more flattering to you and unflattering to me, forcing me to rectify such prospective situation by sharing this E-mail myself.

When I first moved into my new (and first) home here on Paseo del Mar, I assiduously took the time to get to know nearly all my new neighbors. I walked around and introduced myself to nearly everyone, from the Leslies to the Merrill’s and all the way down to the Field’s. This has not been done by any other, to my knowledge. For my first Christmas here in 2007, I tracked down and ordered from the Goodyear Corporation the still shot of Bluff Cove and our properties that Greg Geiger had informed me served as the background of that year’s print campaign, delivering blown up posters of that shot to your family and a dozen others. To be fair, as something of an acquired taste, I recognize that my assertive and forthright approach to communication is not for everyone, but with time good people are drawn to it and those accustomed to violating either written or moral laws will avert it. That filtering approach, with the foundations of *honesty*, *fairness* and *consequences* as foundations, has served me very well, both professionally and personally, over my nearly five decades.

For years, relations with my new neighbors were quite healthy (excluding the shamelessly unrepentant penal and municipal law breaking Tehrani family). For Christmas 2010, nearly 40 neighbors and family members, including practically everyone up and down Via Horcada and upper Paseo del Mar besides yours, accepted my invitation to celebrate year-end at my private party at “Chappy Chinese” (as it’s now affectionate called). Before and after that, I have been invited to join and socialize with Audrey Lowman and her crew next door, have been the only neighbor invited to the Sahrorian Christmas dinner in their home across the street every year, and enjoyed that same distinction at Mal Field’s 80th birthday party in his home just a few months ago. When Jenny Anastassiou sadly passed away last year, her son Jimmy called me and told me I was the first neighbor he wanted to tell given our relationship (see was a truly loving lady). Dan Leslie, my other non-Tehrani next door neighbor for years, frequently walked un-invited “over the hedge” to hang out and discuss the market, politics or something mechanical/scientific. Though I miss his and Scott’s presence (particularly given their replacement), Dan and I still keep in touch. Katina Torino, one of two neighbors having real-estate related disagreements next door with the Geiger’s, kindly and recently invited me to be her doubles partner on her home tennis court. 101 year old Mrs. Rudd across the street from me, during her more lucid days, insisted I escort her to the German Festival in the park. Lastly and most relevantly, your own husband and I have enjoyed mutual respect and companionship, both on and off the tennis court. I could go on and add a few more examples of those who have not been “alienated by” (to use *Rob Feller’s* words), but this will suffice for now.

However, soon after the McDannolds bought into the area, I began to hear from various neighbors that you inexplicably were casting aspersions my way. Whether it be including your family’s invitation in every seasonal festivity at my home, sharing time together at your dinner table discussing intimate personal matters in both of our lives, or my taking Texas (and then Sierra) along with me for afternoon hikes, I struggled to discover what reason I could have given you to treat me with such disdain and disrespect. Those conflicts I had endured with the McDannold, Tehrani (and due to Trent’s *own choice in how to align himself* the Merrill) and Duncan families were related entirely to illegal, PVEPC prohibited, and/or unethical real-estate related behavior of their own initiation. Indeed, by early 2011, the McDannolds finally had finished fighting their other next-door neighbor Jim Duncan (in the only instance in City records of one of our neighbors feeling compelled to appeal a Planning Commission decision and obtaining its agreement that a plan was still excessively incompatible with the neighborhood).

I want to make one thing very clear. **I never will apologize for reacting reasonably to protect the sanctity of my (and now Jenn's) home from those attempting to impair its peace or prosperity with selfish, inconsiderate motives of their own.** Moreover, given that the PVE Police Department, Planning Commission and Homes Association have agreed with my stance on those neighbors' illicit or improper behavior, for you, Trent Merrill or anyone to impeach my own reactions thereto is unjustified and shameful.

When I heard direct and rumored versions of you saying horrible things about me, I only briefly was perturbed by them. This was due to my having heard from one neighbor that at that time in 2010, you had just been convicted of a drug-related felony and sentenced to jail time as a result (www.rn.ca.gov/public/rn312676.pdf). How anyone could not pity you, irrespective of what you had done to them, was beyond me. What a horrible month in jail and five months of home detention that must have been, and my heart was pained for you. Combining this with your problematic family situation, until this past week I was willing to forgive your blatant duplicity and ascribe it to turbulence derived from a lineage of deeply embedded psychological roots.

However, when Rob Feller undeniably acknowledged your being the source of (via the Geiger's as conduit) of perhaps the most horrible maligning of my character and reputation, enough was enough. My pity for you and my affection for your husband (in his most unenviable position) notwithstanding, I am lost for any logical reason to consider you a friend in any fashion. My interaction with the Geiger family perhaps totals five to ten minutes cumulatively over seven years – without your poisoning that well, I have injected nothing unpalatable directly into that relationship. Greg and Jackie don't know me at all, and I do not have any familiarity with them. The peak of my family interaction with the Geiger's is my complimenting Grant on his skateboarding skills some years ago in front of my driveway.

Really, Cindy, I am not sure what pleasure you derive from maligning me or other neighbors who have contributed positively to you. When to my face you falsely labeled as a "racist" Audrey Lowman - my dear friend, consistently faithful, and similarly damaged by our law breaking, mutually bordering neighbor Masoud Tehrani, I was appalled and obviously acted on moral obligation to alert her to this false claim. Thus, I suppose I should not have been surprised at the comfort with which you slander me to others, some of whom you incorrectly estimate will not then inform me of your actions – you knew I was close to Audrey Lowman but still maligning her without any apparent hesitation.

So, in conclusion, the extremely hurtful comments you made indirectly to Rob Feller were the final straw. I no longer can either ignore, or write off to your being sentenced to jail or a volatile family life, you damaging my reputation in my own neighborhood (if not a much wider radius). Just as I determined not to tolerate Ellen Vargas/Theodora's hurtful behavior toward the love of my life (Jennifer – perhaps the sweetest, most "lovely" to quote you, and least worthy of such disdainful actions of any human on Earth), I no longer will tolerate yours. Feel free to continue your unfair and unjustified smear campaign - misinform Lily Kaminskas of Tehrani-alleged, felonious actions falsely reported and *100% impossible* of my doing. If you feel yet again the related need to attempt to entrap me in a false confession of those impossibly committed acts (and a list of others) via a series of text-message interrogatories, type away at your keypad to your satisfaction.

I, however, am done with your duplicity.

RLCjr

From: wifeycindy@aol.com [<mailto:wifeycindy@aol.com>]

Sent: Thursday, July 03, 2014 5:23 PM

To: Robert L. Chapman, Jr.

Subject:

hey, everything good? jennifer was her lovely self but i got the cold shoulder from you. perhaps i am just sensitive and if so sorry and all good. cindy

BEFORE THE
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
STATE OF CALIFORNIA

In the Matter of the Accusation Against:

CYNTHIA LEA DUNBAR
aka CYNTHIA ROTH
716 Paseo Del Mar
Palos Verdes Estates, CA 90274

Registered Nurse License No. 312676

Respondent

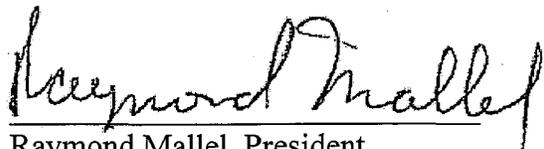
Case No. 2012-64

DECISION AND ORDER

The attached Stipulated Surrender of License and Order is hereby adopted by the Board of Registered Nursing, Department of Consumer Affairs, as its Decision in this matter.

This Decision shall become effective on **November 15, 2012.**

IT IS SO ORDERED **November 15, 2012.**



Raymond Malle, President
Board of Registered Nursing
Department of Consumer Affairs
State of California

1 KAMALA D. HARRIS
Attorney General of California
2 MARCD. GREENBAUM
Supervising Deputy Attorney General
3 MICHAEL A. CACCIOTTI
Deputy Attorney General
4 State Bar No. 129533
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-2579
6 Facsimile: (213) 897-2804
Attorneys for Complainant

7
8 **BEFORE THE**
BOARD OF REGISTERED NURSING
DEPARTMENT OF CONSUMER AFFAIRS
9 **STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. 2012-64

11 **CYNTHIA LEA DUNBAR**
12 **aka CYNTHIA ROTH**
716 Paseo Del Mar
13 Palso Verdes Estates, CA 90274

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

14 Registered Nurse License No. 312676

15 Respondent.

16
17
18 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
19 proceeding that the following matters are true:

20 PARTIES

21 1. Louise R. Bailey, M.Ed., RN (Complainant) is the Interim Executive Officer of the
22 Board of Registered Nursing. She brought this action solely in her official capacity and is
23 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by
24 Michael A. Cacciotti, Deputy Attorney General.

25 2. Cynthia Lea Dunbar aka Cynthia Roth (Respondent) is represented in this proceeding
26 by attorney Laura C. McLennan of Moore McLennan, LLP, whose address is 701 North Brand
27 Boulevard, Suite 200, Glendale, California 91203-4232.2. On or about March 31, 1980, the
28 Board of Registered Nursing issued Registered Nurse License No. 312676 to Cynthia Lea Dunbar

1 aka Cynthia Roth (Respondent). The Registered Nurse License expired on April 30, 2010, and
2 has not been renewed.

3 JURISDICTION

4 3. Accusation No. 2012-64 was filed before the Board of Registered Nursing (Board),
5 Department of Consumer Affairs, and is currently pending against Respondent. The Accusation
6 and all other statutorily required documents were properly served on Respondent on July 28,
7 2011. Respondent timely filed her Notice of Defense contesting the Accusation. A copy of
8 Accusation No. 2012-64 is attached as Exhibit A and incorporated by reference.

9 ADVISEMENT AND WAIVERS

10 4. Respondent has carefully read, fully discussed with counsel, and understands the
11 charges and allegations in Accusation No. 2012-64. Respondent also has carefully read, fully
12 discussed with counsel, and understands the effects of this Stipulated Surrender of License and
13 Order.

14 5. Respondent is fully aware of her legal rights in this matter, including the right to a
15 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at
16 her own expense; the right to confront and cross-examine the witnesses against her; the right to
17 present evidence and to testify on her own behalf; the right to the issuance of subpoenas to
18 compel the attendance of witnesses and the production of documents; the right to reconsideration
19 and court review of an adverse decision; and all other rights accorded by the California
20 Administrative Procedure Act and other applicable laws.

21 6. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
22 every right set forth above.

23 CULPABILITY

24 7. Respondent admits the truth of each and every charge and allegation in Accusation
25 No. 2012-64, agrees that cause exists for discipline and hereby surrenders her Registered Nurse
26 License No. 312676 for the Board's formal acceptance.

27 8. Respondent understands that by signing this stipulation she enables the Board to issue
28 an order accepting the surrender of her Registered Nurse License without further process.

1 This stipulation constitutes a record of the discipline and shall become a part of Respondent's
2 license history with the Board of Registered Nursing.

3 2. Respondent shall lose all rights and privileges as a registered nurse in California as of
4 the effective date of the Board's Decision and Order.

5 3. Respondent shall cause to be delivered to the Board her pocket license and, if one was
6 issued, her wall certificate on or before the effective date of the Decision and Order.

7 4. If Respondent ever files an application for licensure or a petition for reinstatement in
8 the State of California, the Board shall treat it as a petition for reinstatement. Respondent must
9 comply with all the laws, regulations and procedures for reinstatement of a surrendered license in
10 effect at the time the petition is filed, and all of the charges and allegations contained in
11 Accusation No. 2012-64 shall be deemed to be true, correct and admitted by Respondent when
12 the Board determines whether to grant or deny the petition.

13 5. If and when Respondent's license is reinstated, she shall pay to the Board costs
14 associated with its investigation and enforcement pursuant to Business and Professions Code
15 section 125.3 in the amount of \$4,090.00. Respondent shall be permitted to pay these costs in a
16 payment plan approved by the Board. Nothing in this provision shall be construed to prohibit the
17 Board from reducing the amount of cost recovery upon reinstatement of the license.

18 6. If Respondent should ever apply or reapply for a new license or certification, or
19 petition for reinstatement of a license, by any other health care licensing agency in the State of
20 California, all of the charges and allegations contained in Accusation, No. 2012-64 shall be
21 deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of
22 Issues or any other proceeding seeking to deny or restrict licensure.

23 7. Respondent shall not apply for licensure or petition for reinstatement for two (2)
24 years from the effective date of the Board of Registered Nursing's Decision and Order.

25 ///

26 ///

27 ///

28 ///

MAY-30-2012 10:49

CITY GENERAL OFFICE

2138976328 P.86

ACCEPTANCE

I have carefully read the above Stipulated Surrender of License and Order and have fully discussed it with my attorney, Laura C. McLennan. I understand the stipulation and the effect it will have on my Registered Nurse License. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Board of Registered Nursing.

DATED:

6/1/2012

CYNTHIA LEA DUNBAR
aka CYNTHIA ROTH
Respondent

I have read and fully discussed with Respondent Cynthia Lea Dunbar aka Cynthia Roth the terms and conditions and other matters contained in this Stipulated Surrender of License and Order. I approve its form and content.

DATED:

6/8/12

LAURA C. MCLENNAN
Attorney for Respondent

ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted for consideration by the Board of Registered Nursing of the Department of Consumer Affairs.

Dated:

6/14/12

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
MARC D. GREENBAUM
Supervising Deputy Attorney General

MICHAEL A. CACCIOTTI
Deputy Attorney General
Attorneys for Complainant

LA2011501823
51112419.doc

Exhibit A

Accusation No. 2012-64

1 KAMALA D. HARRIS
Attorney General of California
2 MARC D. GREENBAUM
Supervising Deputy Attorney General
3 MICHAEL A. CACCIOTTI
Deputy Attorney General
4 State Bar No. 129533
300 So. Spring Street, Suite 1702
5 Los Angeles, CA 90013
Telephone: (213) 897-2932
6 Facsimile: (213) 897-2804
Attorneys for Complainant
7

8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case No. 2012-04

13 **CYNTHIA LEA DUNBAR**
14 **aka CYNTHIA ROTH**
716 Paseo Del Mar
Palos Verdes Estates, CA 90274

ACCUSATION

15 Registered Nurse License No. 312676

16 Respondent.

17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN (Complainant) brings this Accusation solely in her
20 official capacity as the Executive Officer of the Board of Registered Nursing, Department of
21 Consumer Affairs (Board).

22 2. On or about March 31, 1980, the Board issued Registered Nurse License No. 312676
23 to Cynthia Lea Dunbar aka Cynthia Roth (Respondent). The Registered Nurse License was in
24 full force and effect at all times relevant to the charges brought herein and expired on April 30,
25 2010, as inactive for failure to complete continuing education.

26 **JURISDICTION**

27 3. This Accusation is brought before the Board under the authority of the following
28 laws. All section references are to the Business and Professions Code unless otherwise indicated.

1 "(d) Violating or attempting to violate, directly or indirectly, or assisting in or abetting the
2 violating of, or conspiring to violate any provision or term of this chapter [the Nursing Practice
3 Act] or regulations adopted pursuant to it.

4

5 "(f) Conviction of a felony or of any offense substantially related to the qualifications,
6 functions, and duties of a registered nurse, in which event the record of the conviction shall be
7 conclusive evidence thereof. . . ."

8 9. Section 2762 states, in pertinent part:

9 "In addition to other acts constituting unprofessional conduct within the meaning of this
10 chapter [the Nursing Practice Act], it is unprofessional conduct for a person licensed under this
11 chapter to do any of the following:

12 "(a) Obtain or possess in violation of law, or prescribe, or except as directed by a licensed
13 physician and surgeon, dentist, or podiatrist administer to himself or herself, or furnish or
14 administer to another, any controlled substance as defined in Division 10 (commencing with
15 Section 11000) of the Health and Safety Code or any dangerous drug or dangerous device as
16 defined in Section 4022.

17 "(b) Use any controlled substance as defined in Division 10 (commencing with Section
18 11000) of the Health and Safety Code, or any dangerous drug or dangerous device as defined in
19 Section 4022, or alcoholic beverages, to an extent or in a manner dangerous or injurious to
20 himself or herself, any other person, or the public or to the extent that such use impairs his or her
21 ability to conduct with safety to the public the practice authorized by his or her license.

22 "(c) Be convicted of a criminal offense involving the prescription, consumption, or
23 self-administration of any of the substances described in subdivisions (a) and (b) of this section,
24 or the possession of, or falsification of a record pertaining to, the substances described in
25 subdivision (a) of this section, in which event the record of the conviction is conclusive evidence
26 thereof.

27

28 ///

1 COST RECOVERY

2 13. Section 125.3 provides that the Board may request the administrative law judge to
3 direct a licentiate found to have committed a violation or violations of the licensing act to pay a
4 sum not to exceed the reasonable costs of the investigation and enforcement of the case.

5 CONTROLLED SUBSTANCES / DANGEROUS DRUGS

6 14. Dilaudid, an opium derivative, is a Schedule II controlled substance as defined in
7 Health and Safety Code section 11055(b)(1)(k) and is categorized as a dangerous drug pursuant to
8 section 4022.

9 15. Fioricet is a brand name for the combination of butalbital, acetaminophen and
10 caffeine and is designated a dangerous drug pursuant to section 4022.

11 16. Morphine, alkaloid of opium, is classified as a Schedule II controlled substance as
12 designated by Health and Safety Code section 11055(b)(1)(M) and categorized as a dangerous
13 drug pursuant to section 4022.

14 17. Norco and Vicodin, trade names for combination drugs containing hydrocodone
15 bitartrate (opioid analgesic) and acetaminophen, are Schedule III controlled substance as defined
16 in Health and Safety Code section 11056(e)(4) and are categorized as dangerous drugs pursuant
17 to section 4022.

18 18. Tramadol is a dangerous drug pursuant to section 4022.

19 FIRST CAUSE FOR DISCIPLINE

20 (Failure to Comply with Diversion Program)

21 19. Respondent is subject to disciplinary action under section 2761, subdivision (d), and
22 section 2770.11, in that on or about September 29, 2010, Respondent was terminated from the
23 Board's Registered Nursing Diversion Program (Diversion Program) for failure to comply with
24 provisions of the rehabilitation plan and she was determined to be a public safety risk. The
25 circumstances are as follows:

26 a. On or about June 17, 2008, Respondent voluntarily enrolled in the Diversion Program
27 after admitting to diverting Dilaudid from her place of employment and using it. Respondent was
28 mandated to sign up for drug and alcohol testing.

1 on or about July 30, 2010, Respondent was convicted of a substantially related crime, as follows:

2 a. On or about July 30, 2010, after pleading guilty, Respondent was convicted of two
3 counts, Counts 1 and 4, in the criminal proceeding entitled *The People of the State of California*
4 *v. Cynthia Dunbar* (Super. Ct. Los Angeles County, 2010, No. YA078016).

5 i. On felony Count 1 for violating Health and Safety Code section 11350(a) [possession
6 of a controlled substance, to wit, dilaudid], the Court placed Respondent on the
7 deferred entry of judgment program for 18 months.

8 ii. On misdemeanor Count 4 for violating Health and Safety Code section 11173(a)
9 [forging and issuing a prescription for a narcotic drug, to wit, hydrocodone], the

10 Court sentenced Respondent to 30 days in jail and 150 days of in home detention,
11 placed her on three (3) years probation, and ordered her to complete 150 hours of
12 community service.

13 d. The circumstances underlying the conviction occurred in or about 2007 and 2008,
14 while and after Respondent was employed as a field registry nurse at Little Company of Mary
15 Hospital (LCMH), San Pedro and Torrance, California, locations. Respondent admittedly stole
16 blank prescriptions, prescribed controlled substances, Norco and Vicodin, to herself, forged the
17 names of emergency room physicians and obtained the controlled substances from the Pill Box
18 Pharmacy, Redondo Beach, California, for her own personal use. Respondent prescribed to
19 herself prescriptions as follows:

Rx Number	Hospital	Emergency Physician	Date	Controlled Substance	Count	Refills	Total
00604	San Pedro	Shaw	02/02/08	Norco 10/325	60	4	240
00205	San Pedro	Diaz	02/22/08	Norco 10/325	60	4	240
00664	San Pedro	McFarland	03/27/08	Norco 10/325	60	4	240
01098	San Pedro	McFarland	04/12/08	Norco 10/325	80	4	320
01099	San Pedro	McFarland	05/14/08	Norco 10/325	60	4	240
none	Torrance	Shoji	10/09/08	Norco 10/325	65	3	195
							1475
00458	San Pedro	Lizaso	04/21/08	Vicodin ES	60	4	240
00663	San Pedro	McFarland	04/28/08	Vicodin ES	60	4	240
							480

1 e. On or about June 5, 2008, Respondent admitted to diverting narcotics, Diluadid, from
2 LCMH, Torrance, pharmacy stores and at her lunch break taking a Dilaudid syringe home.

3 **THIRD CAUSE FOR DISCIPLINE**

4 **(Drug Related Conviction)**

5 21. Respondent is subject to disciplinary action under sections 2761, subdivision (a),
6 and 2762, subdivision (c), in that on or about July 30, 2010, Respondent was convicted of a crime
7 involving controlled substances and dangerous drugs. Complainant refers to and by this reference
8 incorporates the allegations set forth above in paragraph 19, subparagraphs a - e, inclusive, as
9 though set forth fully.

10 **FOURTH CAUSE FOR DISCIPLINE**

11 **(False Records)**

12 22. Respondent is subject to disciplinary action under sections 2761, subdivision (a),
13 and 2762, subdivision (e), on the grounds of unprofessional conduct, in that on or between
14 August 6, 2007 and September 5, 2007, while Respondent was employed as a registered nurse at
15 Centinela Freeman Regional Medical Center/Marina Del Rey Hospital (Centinela), Marina Del
16 Rey, California, Respondent made false, or grossly incorrect, grossly inconsistent, or
17 unintelligible entries in hospital and patient records pertaining to Dilaudid. On or about
18 September 5, 2007, after Respondent's admitting that she diverted Dilaudid, Centinela audited
19 Respondent's Pyxis¹ report Dilaudid withdrawals/removals with corresponding hospital and
20 patient records for one month prior and found that Respondent failed to account for 21mgs of
21 Dilaudid. The circumstances are as follows:

22 a. Patient TC. On or about August 10, 2007, Respondent removed higher doses of
23 Dilaudid at 1050 and 1330 hours, despite having access to smaller doses. No discrepancy found.

24 b. Patient TS. On or about September 4, 2007, Respondent removed a total of 12mgs of
25 Dilaudid and documented administration of 6mgs Dilaudid. Respondent failed to document any

26 ¹ Pyxis is a trade name for the automated single-unit dose medication dispensing system
27 that records information such as patient name, physician orders, date and time medication was
28 withdrawn, and the name of the licensed individual who withdrew and administered the
medication.

1. wastage. Respondent failed to account for 6mgs Dilaudid in any hospital records.

2. c. Patient AH. On or about August 31, 2007, Respondent removed Dilaudid 4mg at
3. 1400 hours without a physician's order. The patient was not seen by a physician until 1433
4. hours. Respondent documented waste of 3mg Dilaudid. Respondent failed to document
5. administration of 1mg Dilaudid on the patient's Medication Administration Record (MAR).
6. Respondent failed to account for 1mg Dilaudid in any hospital records.

7. d. Patient AT. On or about September 2, 2007, Respondent removed a total of 28mgs
8. Dilaudid, but only administered the patient with 16mgs. No order was found for Dilaudid after
9. 1440 hours, yet Respondent administered the patient with Dilaudid 2mg at 1635 and 1810 hours.
10. No record of wastage was found. Respondent removed higher doses of Dilaudid (4mg vials)
11. when smaller 4mg vials were available. Respondent failed to account for 12mgs Dilaudid in any
12. hospital records.

13. e. Patient MR. On or about September 4, 2007, Respondent removed 2mg Dilaudid for
14. the patient, despite no physician order for Dilaudid for the patient. Respondent failed to
15. document wastage or administration of the 2mg Dilaudid. Respondent failed to account for 2mg
16. Dilaudid in any hospital records.

17. **FIFTH CAUSE FOR DISCIPLINE**

18. **(Unlawfully Obtaining and Possessing Controlled Substances and Dangerous Drugs)**

19. 23. Respondent is subject to disciplinary action under sections 2761, subdivision (a),
20. and 2762, subdivision (a), on the grounds of unprofessional conduct, in that Respondent obtained
21. controlled substances and dangerous drugs without valid prescriptions. Complainant refers to and
22. by this reference incorporates the allegations set forth above in paragraphs 19 - 21, inclusive, as
23. though set forth fully.

24. **SIXTH CAUSE FOR DISCIPLINE**

25. **(Dangerous Use)**

26. 24. Respondent is subject to disciplinary action under sections 2761, subdivision (a),
27. and 2762, subdivision (b), on the grounds of unprofessional conduct, in that Respondent obtained
28. and used controlled substances and dangerous drugs without valid prescriptions. Complainant

1 refers to and by this reference incorporates the allegations set forth above in paragraphs 19 - 22,
2 inclusive, as though set forth fully.

3 **SEVENTH CAUSE FOR DISCIPLINE**

4 **(Unprofessional Conduct / Violate Act)**

5 25. Respondent is subject to disciplinary action under section 2761, subdivisions (a) and /
6 or (d), in that Respondent committed acts of unprofessional conduct and / or acts violating the
7 Nursing Practice Act. Complainant refers to and by this reference incorporates the allegations set
8 forth above in paragraphs 19 - 23, inclusive, as though set forth fully.

9 **PRAYER**

10 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
11 and that following the hearing, the Board of Registered Nursing issue a decision:

- 12 1. Revoking or suspending Registered Nurse License No. 312676, issued to Cynthia Lea
13 Dunbar aka Cynthia Roth;
- 14 2. Ordering Cynthia Lea Dunbar to pay the Board the reasonable costs of the
15 investigation and enforcement of this case, pursuant to section 125.3; and
- 16 3. Taking such other and further action as deemed necessary and proper.

17
18
19 DATED: July 28, 2011

Louise R. Bailey
20 LOUISE R. BAILEY, M.ED., RN
21 Executive Officer
22 Board of Registered Nursing
23 Department of Consumer Affairs
24 State of California
25 Complainant

26
27
28 LA2011501823
60640149.doc

CH-102

CLETS Information

**California Law Enforcement Telecommunications System (CLETS)
Information Form**

Important Notice: This form **MUST NOT** become part of the public court file. It is confidential and private.

If the court issues a restraining order, this form will provide law enforcement with information that will assist them in enforcing it. Fill out as much of this form as you can and give it to the court clerk. The clerk will provide the confidential information on this form through CLETS into the California Restraining and Protective Order System (CARPOS), a statewide database that lets police know about your orders.

Case number for your restraining order (if you know it): _____

1 Person to Be Protected (Name): R. Lewis Chapman, Jr.

Sex: M F Height: 5'10" Weight: 170 lbs. Race: Caucasian

Hair Color: Black Eye Color: Brown Age: 50 Date of Birth: 06/27/1996

1007 N. Sepulveda Blvd. #129 Manhattan Beach, CA 90267 (949) 484-6244

(Mailing address listed on restraining order) (City, state, zip) (Telephone number [optional])

Vehicle (type, model, year): BMW X5 - 2015; Toyota Yaris - 2013

Vehicle license number and state: 7JYD430/CA and 7NNZ761/CA

2 Person to Be Restrained (Name): Cynthia Lea Dunbar

Sex: M F Height: 5'5" - 5'7" Weight: 140 - 160 lbs. Race: Caucasian

Hair Color: Brown Eye Color: Don't know Age: 63 Date of Birth: 03/14/1954

716 Paseo del Mar Palos Verdes Estates, CA 90274 (310) 850-2651

(Residence address) (City, state, zip) (Telephone number)

(Workplace) (Occupation/title) (Work hours)

(Business address) (City, state, zip) (Telephone number)

Driver's license number and state: ?/CA Vehicle license number and state: 6YYW526/CA

Vehicle (type, model, year): Lexus RX350 (don't know year)

Social Security number: Don't know

Describe any marks, scars, or tattoos: Don't know

Other names used by the restrained person: Cindy Dunbar

3 Guns or Firearms

Describe any guns or firearms you believe the restrained person owns or has access to (number, types, and locations):

Don't know

4 Other People to Be Protected

Name	Date of Birth	Sex	Race
<u>Jennifer Chapman</u>	<u>02/27/1985</u>	<u>F</u>	<u>Caucasian</u>
_____	_____	_____	_____
_____	_____	_____	_____

Additional persons to be protected are listed on Attachment 4.

This is not a Court Order—Do not file in court file.

Clerk stamps date here when form is filed.

FILED
 Superior Court of California
 County of Los Angeles

JUN 01 2017

Sherri R. Carter, Executive Officer/Clerk
 By [Signature] Deputy
Y. Husen

Fill in court name and street address:

Superior Court of California, County of
**SUPERIOR COURT
 SOUTHWEST DISTRICT
 825 MAPLE AVENUE
 TORRANCE, CA 90503-5096**

Court fills in case number when form is filed.

Case Number:
17TRR000009

1 Person Seeking Protection

a. Your Full Name: R. Lewis Chapman, Jr.
 Your Lawyer (if you have one for this case):
 Name: N/A State Bar No.: _____
 Firm Name: N/A

b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.):
 Address: 1007 N. Sepulveda Blvd. #129
 City: Palos Verdes Estates State: CA Zip: 90274
 Telephone: _____ Fax: N/A
 E-Mail Address: _____

2 Person From Whom Protection Is Sought

Full Name: Cynthia Lea Dunbar (aka Cynthia Roth)

The court will complete the rest of this form.

3 Notice of Hearing

A court hearing is scheduled on the request for restraining orders against the person in 2:

Name and address of court if different from above:

Hearing Date → Date: 6-19-17 Time: 8:30
 Dept.: H Room: 180

4 Temporary Restraining Orders (Any orders granted are on Form CH-110, served with this notice.)

- a. Temporary Restraining Orders for personal conduct and stay-away orders as requested in Form CH-100, Request for Civil Harassment Restraining Orders, are (check only one box below):
- (1) All GRANTED until the court hearing.
 - (2) All DENIED until the court hearing. (Specify reasons for denial in b, below.)
 - (3) Partly GRANTED and partly DENIED until the court hearing. (Specify reasons for denial in b, below.)



b. Reasons for denial of some or all of those personal conduct and stay-away orders as requested in Form CH-100, *Request for Civil Harassment Restraining Orders*, are:

- (1) The facts as stated in Form CH-100 do not sufficiently show acts of violence, threats of violence, or a course of conduct that seriously alarmed, annoyed, or harassed the person in ① and caused substantial emotional distress.
- (2) Other (specify): As set forth on Attachment 4b.

5 Service of Documents by The Person in ①

At least five _____ days before the hearing, someone age 18 or older—not you or anyone to be protected—must personally give (serve) a court file-stamped copy of this Form CH-109, to the person in ② along with a copy of all the forms indicated below: *Notice of Court Hearing*,

- a. CH-100, *Request for Civil Harassment Restraining Orders* (file-stamped)
- b. CH-110, *Temporary Restraining Order* (file-stamped) **IF GRANTED**
- c. CH-120, *Response to Request for Civil Harassment Restraining Orders* (blank form)
- d. CH-120-INFO, *How Can I Respond to a Request for Civil Harassment Restraining Orders?*
- e. CH-250, *Proof of Service of Response by Mail* (blank form)
- f. Other (specify): _____

Date: JUN 01 2017



 Judicial Officer

To the Person in ① :

- The court cannot make the restraining orders after the court hearing unless the person in ② has been personally given (served) a copy of your request and any temporary orders. To show that the person in ② has been served, the person who served the forms must fill out a proof of service form. Form CH-200, *Proof of Personal Service*, may be used.
- For information about service, read Form CH-200-INFO, *What Is "Proof of Personal Service"?*
- If you are unable to serve the person in ② in time, you may ask for more time to serve the documents. Use Form CH-115, *Request to Continue Court Hearing and to Reissue Temporary Restraining Order*.

To the Person in ② :

- If you want to respond to the request for orders in writing, file Form CH-120, *Response to Request for Civil Harassment Restraining Orders*, and have someone age 18 or older—**not you or anyone to be protected**—mail it to the person in ①.
- The person who mailed the form must fill out a proof of service form. Form CH-250, *Proof of Service of Response by Mail*, may be used. File the completed form with the court before the hearing and bring a copy with you to the court hearing.
- Whether or not you respond in writing, go to the hearing if you want the judge to hear from you before making an order. You may tell the judge why you agree or disagree with the orders requested.
- You may bring witnesses and other evidence.
- At the hearing, the judge may make restraining orders against you that could last up to five years and may order you to turn in to law enforcement, or sell to or store with a licensed gun dealer, any firearms that you own or possess.

**Request for Accommodations**

Assistive listening systems, computer-assisted real-time captioning, or sign language interpreter services are available if you ask at least five days before the hearing. Contact the clerk's office or go to www.courts.ca.gov/forms for *Request for Accommodations by Persons with Disabilities and Response* (Form MC-410). (Civ. Code, § 54.8.)

(Clerk will fill out this part.)

—Clerk's Certificate—

I certify that this ~~Notice of Court Hearing~~ *Notice of Court Hearing* is a true and correct copy of the original on file in the court.



JUN 0 1 2017

Date: _____

Sherri R. Carter

Clerk, by _____, Deputy

P. PEREZ

Clerk stamps date here when form is filed.

Person in 1 must complete items 1, 2, and 3 only.

FILED
 Superior Court of California
 County of Los Angeles
 JUN 01 2017
 Sherri R. Carter, Executive Officer/Clerk
 By [Signature] Deputy
 Y. Husen

Fill in court name and street address:
 Superior Court of California, County of
**SUPERIOR COURT
 SOUTHWEST DISTRICT
 825 MAPLE AVENUE
 TORRANCE, CA 90503-5096**

Court fills in case number when form is filed.
 Case Number:
17TRR000009

1 Protected Person

a. Your Full Name: R. Lewis Chapman, Jr.
 Your Lawyer (if you have one for this case):
 Name: N/A State Bar No.: _____
 Firm Name: N/A

b. Your Address (If you have a lawyer, give your lawyer's information. If you do not have a lawyer and want to keep your home address private, you may give a different mailing address instead. You do not have to give telephone, fax, or e-mail.):
 Address: 1007 N. Sepulveda Blvd. #129
 City: Manhattan Beach State: CA Zip: 90267
 Telephone: _____ Fax: _____
 E-Mail Address: _____

2 Restrained Person

Full Name: Cynthia Lea Dunbar (aka Cynthia Roth)
 Description:

Sex: M F Height: 5'5" - 5'7" Weight: 140 - 160 lbs Date of Birth: 03/14/1954
 Hair Color: Brown Eye Color: Don't now Age: 63 Race: Caucasian
 Home Address (if known): 716 Paseo del Mar
 City: Palos Verdes Estates State: CA Zip: 90274
 Relationship to Protected Person: Neighbor

3 Additional Protected Persons

In addition to the person named in 1, the following family or household members of that person are protected by the temporary orders indicated below:

Full Name	Sex	Age	Household Member?	Relation to Protected Person
Jennifer Chapman	F	32	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Wife
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____
_____	_____	_____	<input type="checkbox"/> Yes <input type="checkbox"/> No	_____

Check here if there are additional persons. List them on an attached sheet of paper and write "Attachment 3—Additional Protected Persons" as a title. You may use form MC-025, Attachment.

The court will complete the rest of this form.

4 Expiration Date

This Order expires at the end of the hearing scheduled for the date and time below:

Date: 6-19-17 Time: 8:30 a.m. p.m.

This is a Court Order.



To the Person in ② :

The court has granted the temporary orders checked as granted below. If you do not obey these orders, you can be arrested and charged with a crime. You may be sent to jail for up to one year, pay a fine of up to \$1,000, or both.

⑤ Personal Conduct Orders

Not Requested Denied Until the Hearing **Granted as Follows:**

- a. You must **not** do the following things to the person named in ① and to the other protected persons listed in ③ :
- (1) Harass, intimidate, molest, attack, strike, stalk, threaten, assault (sexually or otherwise), hit, abuse, destroy personal property of, or disturb the peace of the person.
 - (2) Contact the person, either directly or indirectly, in **any** way, including, but not limited to, in person, by telephone, in writing, by public or private mail, by interoffice mail, by e-mail, by text message, by fax, or by other electronic means.
 - (3) Take any action to obtain the person's address or location. If this item (3) is not checked, the court has found good cause not to make this order.
 - (4) Other (*specify*):
 Other personal conduct orders are attached at the end of this Order on Attachment 5a(4).
-
- b. Peaceful written contact through a lawyer or a process server or other person for service of legal papers related to a court case is allowed and does not violate this order. However, you may have your papers served by mail on the person in ①.

⑥ Stay-Away Order

Not Requested Denied Until the Hearing **Granted as Follows:**

- a. You must stay at least 100 yards away from (*check all that apply*):
- | | |
|---|---|
| (1) <input checked="" type="checkbox"/> The person in ① | (7) <input type="checkbox"/> The place of child care of the children of the person in ① |
| (2) <input checked="" type="checkbox"/> Each person in ③ | (8) <input checked="" type="checkbox"/> The vehicle of the person in ① |
| (3) <input checked="" type="checkbox"/> The home of the person in ① | (9) <input type="checkbox"/> Other (<i>specify</i>): |
| (4) <input checked="" type="checkbox"/> The job or workplace of the person in ① | _____ |
| (5) <input type="checkbox"/> The school of the person in ① | _____ |
| (6) <input type="checkbox"/> The school of the children of the person in ① | _____ |

- b. This stay-away order does not prevent you from going to or from your home or place of employment.

⑦ No Guns or Other Firearms and Ammunition

- a. You cannot own, possess, have, buy or try to buy, receive or try to receive, or in any other way get guns, other firearms, or ammunition.
- b. You must:
- (1) Sell to or store with a licensed gun dealer, or turn in to a law enforcement agency, any guns or other firearms in your immediate possession or control. This must be done within 24 hours of being served with this Order.

This is a Court Order.

(2) File a receipt with the court within 48 hours of receiving this Order that proves that your guns or firearms have been turned in, sold, or stored. *(You may use form CH-800, Proof of Firearms Turned In, Sold, or Stored, for the receipt.)*

c. The court has received information that you own or possess a firearm.

8 Possession and Protection of Animals

Not Requested **Denied Until the Hearing** **Granted as Follows (specify):**

a. The person in ① is given the sole possession, care, and control of the animals listed below, which are owned, possessed, leased, kept, or held by him or her, or reside in his or her household.
(Identify animals by, e.g., type, breed, name, color, sex.)

b. The person in ② must stay at least _____ yards away from, and not take, sell, transfer, encumber, conceal, molest, attack, strike, threaten, harm, or otherwise dispose of, the animals listed above.

9 Other Orders

Not Requested **Denied Until the Hearing** **Granted as Follows (specify):**

Additional orders are attached at the end of this Order on Attachment 9.

To the Person in ①:

10 Mandatory Entry of Order Into CARPOS Through CLETS

This Order must be entered into the California Restraining and Protective Order System (CARPOS) through the California Law Enforcement Telecommunications System (CLETS). *(Check one):*

a. The clerk will enter this Order and its proof-of-service form into CARPOS.

b. The clerk will transmit this Order and its proof-of-service form to a law enforcement agency to be entered into CARPOS.

c. By the close of business on the date that this Order is made, the person in ① or his or her lawyer should deliver a copy of the Order and its proof-of-service form to the law enforcement agency listed below to enter into CARPOS:

Name of Law Enforcement Agency

Address (City, State, Zip)

Additional law enforcement agencies are listed at the end of this Order on Attachment 10.

This is a Court Order.

11 No Fee to Serve (Notify) Restrained Person Ordered ~~Not Ordered~~

The sheriff or marshal will serve this Order without charge because:

- a. The Order is based on unlawful violence, a credible threat of violence, or stalking.
 b. The person in **1** is entitled to a fee waiver.

12 Number of pages attached to this Order, if any: _____

Date: 6-1-17

Alenda Kasey

 Judicial Officer

Warnings and Notices to the Restrained Person in **2**

You Cannot Have Guns or Firearms

You cannot own, have, possess, buy or try to buy, receive or try to receive, or otherwise get guns, other firearms, or ammunition while this Order is in effect. If you do, you can go to jail and pay a \$1,000 fine. You must sell to or store with a licensed gun dealer, or turn in to a law enforcement agency, any guns or other firearms that you have or control as stated in item **7** above. The court will require you to prove that you did so.

Notice Regarding Nonappearance at Hearing and Service of Order

If you have been personally served with this Temporary Restraining Order and form CH-109, *Notice of Court Hearing*, but you do not appear at the hearing either in person or by a lawyer, and a restraining order that is the same as this Temporary Restraining Order except for the expiration date is issued at the hearing, a copy of the order will be served on you by mail at the address in item **2**.

If this address is not correct or you wish to verify that the Temporary Restraining Order was converted into a restraining order at the hearing without substantive change, or to find out the duration of the order, contact the clerk of the court.

After You Have Been Served With a Restraining Order

- Obey all the orders.
- Read form CH-120-INFO, *How Can I Respond to a Request for Civil Harassment Restraining Orders?*, to learn how to respond to this Order.
- If you want to respond, fill out form CH-120, *Response to Request for Civil Harassment Restraining Orders*, and file it with the court clerk. You do not have to pay any fee to file your response if the Request claims that you inflicted or threatened violence against or stalked the person in **1**.
- You must have form CH-120 served by mail on the person in **1** or that person's attorney. You cannot do this yourself. The person who does the mailing should complete and sign form CH-250, *Proof of Service of Response by Mail*. File the completed proof of service with the court clerk before the hearing date or bring it with you to the hearing.
- In addition to the response, you may file and have declarations served, signed by you and other persons who have personal knowledge of the facts. You may use form MC-030, *Declaration*, for this purpose. It is available from the clerk's office at the court shown on page 1 of this form or at www.courts.ca.gov/forms. If you do not know how to prepare a declaration, you should see a lawyer.

This is a Court Order.

- Whether or not you file a response, you should attend the hearing. If you have any witnesses, they must also go to the hearing.
- At the hearing, the judge can make restraining orders against you that last for up to five years. Tell the judge why you disagree with the orders requested.

Instructions for Law Enforcement

Enforcing the Restraining Order

This order is enforceable by any law enforcement agency that has received the order, is shown a copy of the order, or has verified its existence on the California Restraining and Protective Orders System (CARPOS). If the law enforcement agency has not received proof of service on the restrained person, the agency must advise the restrained person of the terms of the order and then must enforce it. Violations of this order are subject to criminal penalties.

Start Date and End Date of Orders

This order *starts* on the date next to the judge's signature on page 4. The order *ends* on the expiration date in item ④ on page 1.

Arrest Required if Order Is Violated

If an officer has probable cause to believe that the restrained person had notice of the order and has disobeyed the order, the officer must arrest the restrained person. (Pen. Code, §§ 836(c)(1), 13701(b).) A violation of the order may be a violation of Penal Code section 166 or 273.6. Agencies are encouraged to enter violation messages into CARPOS.

Notice/Proof of Service

The law enforcement agency must first determine if the restrained person had notice of the order. Consider the restrained person "served" (given notice) if (Pen. Code, § 836(c)(2)):

- The officer sees a copy of the Proof of Service or confirms that the Proof of Service is on file; or
- The restrained person was informed of the order by an officer.

An officer can obtain information about the contents of the order and proof of service in CARPOS. If proof of service on the restrained person cannot be verified, the agency must advise the restrained person of the terms of the order and then enforce it.

If the Protected Person Contacts the Restrained Person

Even if the protected person invites or consents to contact with the restrained person, this order remains in effect and must be enforced. The protected person cannot be arrested for inviting or consenting to contact with the restrained person. The order can be changed only by another court order. (Pen. Code, § 13710(b).)

This is a Court Order.

Conflicting Orders—Priorities for Enforcement

If more than one restraining order has been issued, the orders must be enforced according to the following priorities (see Pen. Code, § 136.2; Fam. Code, §§ 6383(h)(2), 6405(b)):

1. *EPO*: If one of the orders is an *Emergency Protective Order* (form EPO-001) and is more restrictive than other restraining or protective orders, it has precedence in enforcement over all other orders.
2. *No Contact Order*: If there is no EPO, a no-contact order that is included in a restraining or protective order has precedence over any other restraining or protective order.
3. *Criminal Order*: If none of the orders includes a no contact order, a domestic violence protective order issued in a criminal case takes precedence in enforcement over any conflicting civil court order. Any nonconflicting terms of the civil restraining order remain in effect and enforceable.
4. *Family, Juvenile, or Civil Order*: If more than one family, juvenile, or other civil restraining or protective order has been issued, the one that was issued last must be enforced.

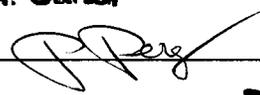


(Clerk will fill out this part.)

—Clerk's Certificate—

I certify that this *Temporary Restraining Order* is a true and correct copy of the original on file in the court.

Sherri R. Carter

Date: JUN 01 2017 Clerk, by , Deputy

P. PEREZ

This is a Court Order.

Clerk stamps date here when form is filed.

1 Person Seeking Protection

Name: R. Lewis Chapman, Jr.

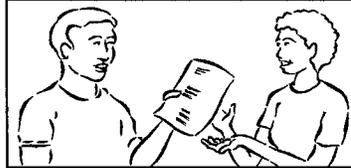
2 Person From Whom Protection Is Sought

Name: Cynthia Lea Dunbar (aka Cynthia Roth)

3 Notice to Server

The server must:

- Be 18 years of age or older.
- Not be listed in items ① or ③ of Form CH-100.
- Give a copy of all documents checked in ④ to the person in ②. (You cannot send them by mail.) Then complete and sign this form and give or mail it to the person in ①.



Fill in court name and street address:

Superior Court of California, County of

Court fills in case number when form is filed.

Case Number:

17TRR000009

PROOF OF PERSONAL SERVICE

4 I gave the person in ② a copy of the forms checked below:

- a. CH-109, *Notice of Court Hearing*
- b. CH-110, *Temporary Restraining Order*
- c. CH-100, *Request for Civil Harassment Restraining Orders*
- d. CH-120, *Response to Request for Civil Harassment Restraining Orders* (blank form)
- e. CH-120-INFO, *How Can I Respond to a Request for Civil Harassment Restraining Orders?*
- f. CH-130, *Civil Harassment Restraining Order After Hearing*
- g. CH-800, *Proof of Firearms Turned In, Sold, or Stored* (blank form)
- h. Other (specify): MC-025 ATTACHMENT

5 I personally gave copies of the documents checked above to the person in ②:

- a. On (date): June 7, 2017 b. At (time): 3:10 a.m. p.m.
- c. At this address: 716 Paseo del Mar

City: Palos Verdes Estates State: CA Zip: 90274

6 Server's Information

Name: Luis A. MARTINEZ

Address: 4733 TORRANCE BLVD. # 322

City: TORRANCE State: CA Zip: 90503

Telephone: 310-5403262

(If you are a registered process server):

County of registration: LOS ANGELES Registration number: 3456

I declare under penalty of perjury under the laws of the State of California that the information above is true and correct.

Date: 06/07/2017

Type or print server's name

Server to sign here