

ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: JUSTINE BROWN FIRM NAME: STREET ADDRESS: 39425 Vista Del Bosque CITY: Murrieta STATE: CA ZIP CODE: 92562 TELEPHONE NO.: (951) 544-2033 FAX NO.: EMAIL ADDRESS: snbpilot@aol.com ATTORNEY FOR (name): In Pro Per		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE STREET ADDRESS: 27401 Menifee Center Drive MAILING ADDRESS: CITY AND ZIP CODE: Menifee 92584 BRANCH NAME: Menifee Justice Center		
PLAINTIFF: JUSTINE BROWN DEFENDANT: THE AVALON MANAGEMENT GROUP, INC.; LA CRESTA PROPERTY OWNERS ASSOCIATION <input checked="" type="checkbox"/> DOES 1 TO 100		
COMPLAINT—Personal Injury, Property Damage, Wrongful Death <input type="checkbox"/> AMENDED (Number): Type (check all that apply): <input type="checkbox"/> MOTOR VEHICLE <input checked="" type="checkbox"/> OTHER (specify): TORT & CONTRACT <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Personal Injury <input checked="" type="checkbox"/> Other Damages (specify): Jurisdiction (check all that apply): <input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE (does not exceed \$35,000) Amount demanded <input type="checkbox"/> does not exceed \$10,000 <input checked="" type="checkbox"/> exceeds \$10,000 <input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$35,000) <input type="checkbox"/> ACTION IS RECLASSIFIED by this amended complaint <input type="checkbox"/> from limited to unlimited <input type="checkbox"/> from unlimited to limited		CASE NUMBER:  CVME2505848

1. Plaintiff (name or names): JUSTINE BROWN  
alleges causes of action against defendant (name or names):  
THE AVALON MANAGEMENT GROUP, INC.; LA CRESTA PROPERTY OWNERS ASSOCIATION
  2. This pleading, including attachments and exhibits, consists of the following number of pages: 4
  3. Each plaintiff named above is a competent adult
    - a. ☐ except plaintiff (name):
      - (1) ☐ a corporation qualified to do business in California.
      - (2) ☐ an unincorporated entity (describe):
      - (3) ☐ a public entity (describe):
      - (4) ☐ a minor ☐ an adult
        - (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed.
        - (b) ☐ other (specify):
      - (5) ☐ other (specify):
    - b. ☐ except plaintiff (name):
      - (1) ☐ a corporation qualified to do business in California.
      - (2) ☐ an unincorporated entity (describe):
      - (3) ☐ a public entity (describe):
      - (4) ☐ a minor ☐ an adult
        - (a) ☐ for whom a guardian or conservator of the estate or a guardian ad litem has been appointed.
        - (b) ☐ other (specify):
      - (5) ☐ other (specify):
- ☐ Information about additional plaintiffs who are not competent adults is shown in Attachment 3.

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THE AVALON MANAGEMENT GROUP, INC.; LA CRESTA PROPERTY  
OWNERS ASSOCIATION

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4. ☐ Plaintiff (name):  
is doing business under the fictitious name (specify):

and has complied with the fictitious business name laws.

5. Each defendant named above is a natural person

- a. ☒ except defendant (name): THE AVALON MANAGEMENT GROUP, INC.

(1) ☐ a business organization, form unknown.

(2) ☒ a corporation.

(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):

(5) ☐ other (specify):

- c. ☐ except defendant (name):

(1) ☐ a business organization, form unknown.

(2) ☐ a corporation.

(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):

(5) ☐ other (specify):

- b. ☒ except defendant (name): LA CRESTA PROPERTY OWNERS ASSOCIATION

(1) ☒ a business organization, form unknown.

(2) ☐ a corporation.

(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):

(5) ☐ other (specify):

- d. ☐ except defendant (name):

(1) ☐ a business organization, form unknown.

(2) ☐ a corporation.

(3) ☐ an unincorporated entity (describe):

(4) ☐ a public entity (describe):

(5) ☐ other (specify):

☐ Information about additional defendants who are not natural persons is contained in Attachment 5.

6. The true names of defendants sued as Does are unknown to plaintiff.

- a. ☒ Doe defendants (specify Doe numbers): 1 to 10

were the agents or employees of other named defendants and acted within the scope of that agency or employment.

- b. ☒ Doe defendants (specify Doe numbers): 11-100 plaintiff.

are persons whose capacities are unknown to plaintiff.

7. ☐ Defendants who are joined under Code of Civil Procedure section 382 are (names):

8. This court is the proper court because

- a. ☒ at least one defendant now resides in its jurisdictional area.

- b. ☒ the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.

- c. ☒ injury to person or damage to personal property occurred in its jurisdictional area.

- d. ☐ other (specify):

9. ☐ Plaintiff is required to comply with a claims statute, and

- a. ☐ has complied with applicable claims statutes, or

- b. ☐ is excused from complying because (specify):

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10. The following causes of action are attached and the statements above apply to each (*each complaint must have one or more causes of action attached*):

- a. ☐ Motor Vehicle
- b. ☐ General Negligence
- c. ☒ Intentional Tort
- d. ☐ Products Liability
- e. ☐ Premises Liability
- f. ☒ Other (*specify*): Defamation, Breach of Privacy (See Attached)

11. Plaintiff has suffered (*check all that apply*)

- a. ☒ wage loss.
- b. ☐ loss of use of property.
- c. ☐ hospital and medical expenses.
- d. ☒ general damage.
- e. ☐ property damage.
- f. ☐ loss of earning capacity.
- g. ☒ other damage (*specify*): Humiliation

12. ☐ The damages claimed for wrongful death and the relationships of plaintiff to the deceased are

- a. ☐ listed in Attachment 12.
- b. ☐ as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. **Plaintiff prays** for judgment for costs of suit; for such relief as is fair, just, and equitable; and for

- a. (1) ☒ compensatory damages.
- (2) ☒ punitive damages.
- b. The amount of damages is (*in cases for personal injury or wrongful death, you must check (1)*):
  - (1) ☒ according to proof.
  - (2) ☐ in the amount of: \$

15. ☒ The paragraphs of this complaint alleged on information and belief are as follows (*specify paragraph numbers*):  
 See attached.

Date: May 15, 2025

JUSTINE BROWN

(TYPE OR PRINT NAME)



(SIGNATURE OF PLAINTIFF OR ATTORNEY)

JUSTINE BROWN v THE AVALON MANAGEMENT GROUP, INC.;  
LA CRESTA PROPERTY OWNERS ASSOCIATION

**SECTIONS 10(f) & 15 ATTACHMENT**

Following my formal written complaint to the LCPOA Board of Directors and at the LCPOA May 2023 open session meeting, President Westra and the Board passed a motion appointing Director Rick DeAndero and Director Vince Scarpino to conduct an official personnel investigation into this matter.

During the discussion of this complaint in open session before a room of approximately forty LCPOA members, President Westra announced that the complainant's identity would remain confidential, as this was a "personnel matter" involving Avalon Management. However, immediately after making this statement, President Westra publicly identified me by name, stating, *"the Board will thoroughly investigate Mrs. Brown's complaint."* This reckless disclosure resulted in several individuals present turning to me and asking, *"Is this your wife Cal is talking about?"*

President Westra's actions constituted a direct violation of my right to privacy under [California Civil Code § 1798.24](#), ([California Privacy Rights Act - CPRA](#)) and other applicable statutory protections. Personnel investigations, whether concerning association members or management, must be maintained in strict confidentiality to protect all parties involved. This breach of confidentiality was intentional and malicious, as evidenced by Ms. Traci Russell's immediate reaction when she turned to President Westra and stated, *"You were not supposed to say her name."* President Westra responded, *"I know,"* confirming that his disclosure was deliberate.

This public exposure was not only a blatant violation of President Westra's fiduciary duty under [California Corporations Code § 7231\(a\)](#), but also a direct act of harassment and intimidation against my husband and me, creating a hostile environment in violation of the **Fair Housing Act (42 U.S.C. § 3604(b))**, which prohibits discrimination, harassment, and retaliation against individuals based on race. Given the nature of the complaint and the subsequent exposure of my my identity, this incident also raises serious concerns regarding violations of [California Penal Code § 422.6](#), which prohibits willful interference with an individual's rights through intimidation, threats, or coercion, particularly in cases involving racial discrimination.

As a result of this incident, it has become public. My neighbors and clients have discussed this topic and brought it to my attention. I have had my privacy and civil rights violated due to the actions of Ms. Russell and Cal Westra.

Mr. Cal Westra and his wife, Cheryl Westra, moved to Texas in February 2025 and no longer live in Murrieta, CA. Since they no longer live in La Cresta and are still active on the NextDoor social media group as an administrator, this only adds in their attempts to have control over community affairs, and this only supports the conspiratorial conduct of him and his supporters. These attacks are continuing as they no longer live here.