

1 Marc E. Angelucci, Esq.  
2 LAW OFFICE OF MARC ANGELUCCI  
3 Attorney for Plaintiff,  
4 Eldon Ray Blumhorst  
5  
6

7 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
8 COUNTY OF LOS ANGELES, CENTRAL DISTRICT  
9

10 ELDON RAY BLUMHORST, )

Case No. BC291977

11 Plaintiff, )

*FIRST* AMENDED COMPLAINT FOR  
INJUNCTION

12 v. )

13 )  
14 HAVEN HILLS, INC.; HOUSE OF RUTH, )  
15 INC.; RAINBOW SERVICES, LTD.; )  
16 YOUNG WOMEN’S CHRISTIAN )  
17 ASSOCIATION OF GLENDALE, )  
18 CALIFORNIA; JEWISH FAMILY SERVICE )  
19 OF LOS ANGELES; HAVEN HOUSE, INC.; )  
20 PEACE AND JOY CARE CENTER; SU )  
21 CASA FAMILY CRISIS AND SUPPORT )  
22 CENTER; SOUTHERN CALIFORNIA )  
23 ALCOHOL AND DRUG PROGRAMS, )  
24 INC.; DOMESTIC VIOLENCE CENTER )  
25 OF THE SANTA CLARITA VALLEY; )  
26 STATE OF CALIFORNIA; COUNTY OF )  
27 LOS ANGELES; STATE OF )  
28 CALIFORNIA; STATE OF CALIFORNIA )  
OFFICE OF CRIMINAL JUSTICE )  
PLANNING; STATE OF CALIFORNIA )  
DEPARTMENT OF HEALTH SERVICES; )  
AND DOES 1 THROUGH 60, )

Defendants. )

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**FACTUAL BACKGROUND**

1. For years, male victims of domestic violence who seek shelter to escape a violent environment at home have been denied access to domestic violence shelters and at best referred to a shelter in the remote desert community of Lancaster, California (which accepts all victims), often hundreds of miles away, only on account of their being male.
2. In the early 1990s, Patricia Overberg, Director of the Valley Oasis shelter in Lancaster, courageously decided to open her shelter for *all* victims. Ms. Overberg set aside some space for male victims and, when necessary, mixed them with the consent of the victims.
3. Ms. Overberg saw men travel hundreds of miles *each way* to receive services that were available to women in their own neighborhoods but not to men.
4. In almost ten years of serving as Valley Oasis Director, Ms. Overberg is aware of *no problems* arising from sheltering all victims. Nonetheless Ms. Overberg was “subjected to continuous abuse by other directors for sheltering battered men.”  
([www.ncfmla.org/pdfdocs/commissionletters/overberg.pdf](http://www.ncfmla.org/pdfdocs/commissionletters/overberg.pdf).)
5. Today Valley Oasis continues to shelter all victims, male or female, under a new director.

**STATISTICAL BACKGROUND**

6. The United States Department of Justice has announced:

**[A]pproximately 1.5 million women and 834,732 men are raped and/or physically assaulted by an intimate partner annually in the United States.**

(Natl. Violence Against Women Survey, [www.ncjrs.org/txtfiles1/nij/181867.txt](http://www.ncjrs.org/txtfiles1/nij/181867.txt).)

7. The American Medical Association has announced:

1 **Men are undoubtedly victims of intimate partner violence.**  
2 **Current data suggest that at least 15% of cases of intimate**  
3 **partner violence have male victims, most of whom have female**  
4 **partners.**

5 (Data on Violence Between Intimates, (I-00).)

6 The American Medical Association urges public services to “develop appropriate  
7 interventions for all victims of intimate violence” (*Ibid.*) and has stated:

8 **[M]any women also use violence for the same reasons men do: as**  
9 **expressive behavior, instrumental behavior, or as an attempt to**  
10 **exert control . . . [T]he most conservative indicator of battering-**  
11 **to the 52 million married couples in the United States suggests**  
12 **that 104,000 men are injured by their wives each year.**

13 (“Violence Toward Men: Fact or Fiction?” Council on Scientific Affairs (I-94).<sup>1</sup>)

- 14 8. California State University at Long Beach maintains a bibliography of 138 scholarly  
15 investigations with an aggregate sample size exceeding 100,000 showing that:

16 **[W]omen are as physically aggressive, or more aggressive, than**  
17 **men in their relationships with their spouses or male partners.**

18 (www.csulb.edu/%7Emfiebert/assault.htm>.) One such study is a metaanalysis in the  
19 Psychological Bulletin (9/00), an American Psychological Association publication,  
20 finding that 38 percent of physically harmed victims are men and “women were more  
21 likely than men to use one or more acts of physical aggression and to use such acts more  
22 frequently.” (*Ibid.*)

- 23  
24  
25 9. Renowned domestic violence researcher Richard Gelles, Ph.D., Chair of Child Welfare  
26

---

27  
28 <sup>1</sup>  
<[http://207.68.164.250/cgi-bin/linkrd?\\_lang=EN&lah=8c884f998c49ee5dd01c916ca99d7d2e&lat=1057638500&hm\\_\\_\\_action=ht  
tp%3a%2f%2fwww%2eama%2dassn%2eorg%2fama%2fpub%2farticle%2f2036%2d2559%2ehtml](http://207.68.164.250/cgi-bin/linkrd?_lang=EN&lah=8c884f998c49ee5dd01c916ca99d7d2e&lat=1057638500&hm___action=ht<br/>tp%3a%2f%2fwww%2eama%2dassn%2eorg%2fama%2fpub%2farticle%2f2036%2d2559%2ehtml)>.)

1 and Family Violence School of Social Work, University of Pennsylvania, conducted  
2 extensive research for the National Institute of Mental Health for a period of more than  
3 ten years and repeatedly found that, “contrary to the claim that women only hit in self-  
4 defense, we found that women were as likely to initiate the violence as were men,” and  
5 has said:  
6

7  
8 There are, of course, hundreds of men killed each year by their  
9 partners. At a minimum, one-fourth of the men killed have not used  
10 violence towards their homicidal partners. Men have been shot,  
11 stabbed, beaten with objects . . . . Battered men face a tragic apathy.  
12 Their one option is to call the police and hope that a jurisdiction will  
13 abide by a mandatory or presumptive arrest statute. However, when  
14 the police do carry out an arrest when a male has been beaten, they  
15 tend to engage in the practice of “dual arrest” and arrest both parties.  
16 Battered men who flee their attackers find that the act of fleeing  
17 results in the men losing physical and even legal custody of their  
18 children. Those men who stay are thought to be “wimps,” at best and  
19 “perps” at worst . . . . Thirty years ago battered women had no place  
20 to go and no place to turn for help and assistance. Today, there are  
21 places to go . . . . For men, there still is no place to go and no one to  
22 whom to turn.<sup>2</sup>

23  
24 10. The worst victims of this are men who are unemployed, impoverished, mentally or  
25 physically disabled, and fathers who do not want to leave their children with an abuser  
26 but also have no place to take them. (Ibid.)

27  
28  
**GENERAL ALLEGATIONS**

11. Plaintiff Eldon Ray Blumhorst (“Plaintiff”) is a decorated Vietnam War veteran who  
served on the USS Valley Forge during the Vietnam War.

---

<sup>2</sup> (www.ncfmla.org/resources/gelles/RichardGellesArticle.htm, emphasis added.)

- 1 12. Plaintiff is also a battered husband. Today he walks with a limp, not from war wounds  
2 but from one of his ex-wife's assaults in which she hurled a piece of furniture at him.  
3
- 4 13. When Plaintiff was assaulted by his partner, he sought help from social service  
5 organizations but found little or no help because he was a male.  
6
- 7 14. Consequently, Plaintiff realized the injustice that males often face as domestic violence  
8 victims, and he joined the National Coalition of Free Men's ("NCFM") Los Angeles  
9 Chapter ("NCFM-LA").
- 10 15. NCFM is a nationwide, nonprofit educational organization founded in Maryland in 1976  
11 to raise awareness about legal, social, cultural and political issues affecting males.  
12  
13 Actor Ed Asner, late actor Gregory Hynes, late Playboy columnist Asa Baber, bestselling  
14 author Warren Farrell, Ph.D., and others have served on NCFM's board of advisors.  
15  
16 NCFM has received awards from Encyclopedia Britannica and others for the educational  
17 content of its Website. Numerous public figures, including columnist John Leo and  
18 Canadian Senator Anne Cools, have accepted awards from NCFM.  
19
- 20 16. NCFM-LA formed in 2001 as a local watchdog organization (more than a social service  
21 organization) that opposes sex discrimination against males in child custody, criminal  
22 sentencing, draft registration, domestic violence services, and elsewhere.  
23
- 24 17. NCFM-LA's work has received written support from the Mental Health Association of  
25 Los Angeles, Judge Mablean of Fox TV's "Divorce Court," State Assemblymembers  
26 Rod Wright and John Ashburn, Kaiser Hospital, June Dunbar of the Los Angeles County  
27 Commission for Women, California State University at Long Beach, and other  
28 community members. (<[www.ncfmla.org/activism/activism.html](http://www.ncfmla.org/activism/activism.html)>.)

- 1 18. One of NCFM-LA's ways of combating sex discrimination against males is to have  
2 individuals test for sex discrimination in public institutions and to take legal action where  
3 they find that discrimination exists. Civil rights testing is accepted by courts to ferret out  
4 discrimination. (*Pierson v. Ray* (1967) 386 U.S. 547, 558; *Evers v. Dwyer* (1958) 358  
5 U.S. 202, 204; *Havens Realty Corp. v. Coleman* (1982) 455 U.S. 363, 373-374; Haydon,  
6 *A Measure of Our Progress: Testing for Race Discrimination in Public Accommodations*  
7 (1997) 44 UCLA L.Rev. 1207; see also *Koire v. Metro Car Wash* (1985) 40 Cal.3d 24.)  
8  
9  
10 19. NCFM-LA spent three years asking the domestic violence community in Los Angeles  
11 County to be fair and provide shelter and outreach for male as well as female victims.  
12 For example, NCFM-LA testified numerous times before the County Board of  
13 Supervisors and at County domestic violence meetings, wrote letters, submitted evidence,  
14 published articles in the Los Angeles Times, Los Angeles Daily News, and elsewhere,  
15 spoke out on local radio shows, and more. In 2002, NCFM-LA submitted a proposal to  
16 the Los Angeles County Domestic Violence Council's Executive Committee, largely  
17 comprised of shelter directors, for a task force on male victims. The Committee never  
18 responded. ([www.dailybreeze.com/content/opinion/nmangelucci22.html](http://www.dailybreeze.com/content/opinion/nmangelucci22.html)>.)  
19  
20  
21  
22 20. To date, male victims are denied shelter and must travel to the desert to receive it.  
23  
24 21. NCFM-LA therefore decided to test state-funded domestic violence shelters to document  
25 whether they discriminate by sex. Plaintiff agreed to do the testing.  
26  
27 22. Between December 9 and December 14, 2002, Plaintiff called state-funded domestic  
28 violence shelters who are defendants in this case. He stated that he was a domestic  
violence victim and that he needed shelter to escape his violent partner. Each defendant

1 denied him shelter *because he was male*, not due to capacity or other reasons. None of  
2 them even offered him a motel voucher. This violated Government Code Section 11135.

3  
4 23. Plaintiff now seeks *injunctive* relief (not monetary damages).

5 24. At all times during the year preceding the filing of this action Plaintiff was a resident of  
6 the City of Sherman Oaks, County of Los Angeles, California, paid taxes to the State of  
7 California, and paid ad valorem taxes to the County of Los Angeles.

8  
9 25. Plaintiff is currently unaware of the actual names of each of the Defendants fictitiously  
10 named as “Does 1 through 65” but will amend this complaint to include their names upon  
11 discovering their identity.  
12

13  
14 **FIRST CAUSE OF ACTION AGAINST DOMESTIC VIOLENCE CENTER OF THE**  
15 **SANTA CLARITA VALLEY AND DOES ONE THROUGH FIVE.**

16 26. Domestic Violence Center of the Santa Clarita Valley is a corporation organized under  
17 the laws of California with its corporate headquarters and principal place of business in  
18 Newhall, California.  
19

20 27. At all times mentioned herein, said defendant has operated a domestic violence shelter.

21 28. During the fiscal year 2001-2002, said defendant received financial assistance from the  
22 State of California.  
23

24 29. On December 16, 2002, Plaintiff called said defendant at its domestic violence hotline  
25 (661-259-4357) and informed said defendant that he needed shelter from domestic  
26 violence perpetrated against him. Said defendant refused to provide Plaintiff with shelter  
27 because he was a man.  
28

1 30. It is said defendant's policy to refuse to provide shelter to men.

2 31. Said action and policy violates Government Code Section 11135.

3  
4 32. Does one through five are responsible in some way for the discrimination alleged herein.

5 **SECOND CAUSE OF ACTION AGAINST SOUTHERN CALIFORNIA ALCOHOL**  
6 **AND DRUG PROGRAMS, INC. AND DOES SIX THROUGH TEN.**

7  
8 33. Southern California Alcohol and Drug Programs, Inc. is a corporation organized under  
9 the laws of California with its corporate headquarters and principal place of business in  
10 Pasadena, California.

11 34. At all times mentioned herein, said defendant has operated a domestic violence shelter.

12 35. During the fiscal year 2001-2002, said defendant received financial assistance from the  
13 State of California.

14  
15 36. On December 15, 2002, Plaintiff called said defendant at its domestic violence hotline  
16 (562-941-6855) and informed said defendant that he needed shelter from domestic  
17 violence perpetrated against him. Said defendant refused to provide Plaintiff with shelter  
18 because he was a man.

19  
20 37. It is said defendant's policy to refuse to provide shelter to men.

21 38. Said action and policy violates Government Code Section 11135.

22 39. Does one through five are responsible in some way for the discrimination alleged herein.

23 **THIRD CAUSE OF ACTION AGAINST HOUSE OF RUTH, INC. AND DOES 11**  
24 **THROUGH 15.**

25  
26 40. House of Ruth, Inc. is a corporation organized under the laws of California with its  
27 corporate headquarters and principal place of business in Pomona, California.  
28



- 1 41. At all times mentioned herein, said defendant has operated a domestic violence shelter.  
2  
3 42. During the fiscal year 2001-2002, said defendant received financial assistance from the  
4 State of California.  
5 43. On December 14, 2002, Plaintiff called said defendant at its domestic violence hotline  
6 (909-988-5559) and informed said defendant that he needed shelter from domestic  
7 violence perpetrated against him. Said defendant refused to provide Plaintiff with shelter  
8 because he was a man.  
9  
10 44. It is said defendant's policy to refuse to provide shelter to men.  
11  
12 45. Said action and policy violates Government Code Section 11135.  
13  
14 46. Does 11 through 15 are responsible in some way for the discrimination alleged herein.

15 **FOURTH CAUSE OF ACTION AGAINST RAIOW SERVICES, LTD. AND DOES 16**  
16 **THROUGH 20.**

- 17 47. Rainbow Services, LTD. is a corporation organized under the laws of California with its  
18 corporate headquarters and principal place of business in San Pedro, California.  
19  
20 48. At all times mentioned herein, said defendant has operated a domestic violence shelter.  
21  
22 49. During the fiscal year 2001-2002, said defendant received financial assistance from the  
23 State of California.  
24  
25 50. On December 14, 2002, Plaintiff called said defendant at its domestic violence hotline  
26 (310-547-9343) and informed said defendant that he needed shelter from domestic  
27 violence perpetrated against him. Said defendant refused to provide Plaintiff with shelter  
28 because he was a man.  
51. It is said defendant's policy to refuse to provide shelter to men.

1 52. Said action and policy violates Government Code Section 11135.

2 53. Does 16 through 20 are responsible in some way for the discrimination alleged herein.

3  
4 **FIFTH CAUSE OF ACTION AGAINST HAVEN HILLS, INC. AND DOES 21**

5 **THROUGH 25.**

6 54. Haven Hills, Inc. is a corporation organized under the laws of California with its  
7 corporate headquarters and principal place of business in San Pedro, California.

8  
9 55. At all times mentioned herein, said defendant has operated a domestic violence shelter.

10 56. During the fiscal year 2001-2002, said defendant received financial assistance from the  
11 State of California.

12  
13 57. On December 14, 2002, Plaintiff called said defendant at its domestic violence hotline  
14 (818-887-6589) and informed said defendant that he needed shelter from domestic  
15 violence perpetrated against him. Said defendant refused to provide Plaintiff with shelter  
16 because he was a man.

17  
18 58. It is said defendant's policy to refuse to provide shelter to men.

19  
20 59. Said action and policy violates Government Code Section 11135.

21 60. Does 21 through 25 are responsible in some way for the discrimination alleged herein.

22 **SIXTH CAUSE OF ACTION AGAINST SU CASA FAMILY CRISIS AND SUPPORT**

23 **CENTER AND DOES 26 THROUGH 30.**

24  
25 61. Su Casa Family Crisis Support Center is a corporation organized under the laws of  
26 California with its corporate headquarters and principal place of business in Artesia,  
27 California.

28 62. At all times mentioned herein, said defendant has operated a domestic violence shelter.

1 63. During the fiscal year 2001-2002, said defendant received financial assistance from the  
2 State of California.

3  
4 64. On December 14, 2002, Plaintiff called said defendant at its domestic violence hotline  
5 (562-402-4888) and informed said defendant that he needed shelter from domestic  
6 violence perpetrated against him. Said defendant refused to provide Plaintiff with shelter  
7 because he was a man.

8  
9 65. It is said defendant's policy to refuse to provide shelter to men.

10 66. Said action and policy violates Government Code Section 11135.

11  
12 67. Does 26 through 30 are responsible in some way for the discrimination alleged herein.

13 **SEVENTH CAUSE OF ACTION AGAINST PEACE & JOY CENTER AND DOES 31**  
14 **THROUGH 35.**

15  
16 68. Peace & Joy Care Center is a corporation organized under the laws of California with its  
17 corporate headquarters and principal place of business in Artesia, California.

18 69. At all times mentioned herein, said defendant has operated a domestic violence shelter.

19  
20 70. During the fiscal year 2001-2002, said defendant received financial assistance from the  
21 State of California.

22 71. On December 14, 2002, Plaintiff called said defendant at its domestic violence hotline  
23 (310-898-3117) and informed said defendant that he needed shelter from domestic  
24 violence perpetrated against him. Said defendant refused to provide Plaintiff with shelter  
25 because he was a man.

26  
27 72. It is said defendant's policy to refuse to provide shelter to men.

28 73. Said action and policy violates Government Code Section 11135.

1 74. Does 31 through 35 are responsible in some way for the discrimination alleged herein.

2 **EIGHTH CAUSE OF ACTION AGAINST HAVEN HOUSE, INC. AND DOES 36**

3  
4 **THROUGH 40.**

5 75. Haven House, Inc. is a corporation organized under the laws of California with its  
6 corporate headquarters and principal place of business in Pasadena, California.

7  
8 76. At all times mentioned herein, said defendant has operated a domestic violence shelter.

9 77. During the fiscal year 2001-2002, said defendant received financial assistance from the  
10 State of California.

11  
12 78. On December 14, 2002, Plaintiff called said defendant at its domestic violence hotline  
13 (323-681-2626) and informed said defendant that he needed shelter from domestic  
14 violence perpetrated against him. Said defendant refused to provide Plaintiff with shelter  
15 because he was a man.

16  
17 79. It is said defendant's policy to refuse to provide shelter to men.

18 80. Said action and policy violates Government Code Section 11135.

19  
20 81. Does 36 through 40 are responsible in some way for the discrimination alleged herein.

21 **NINTH CAUSE OF ACTION AGAINST YOUNG WOMEN'S CHRISTIAN**  
22 **ASOCIATION OF GLENDALE, CALIFORNIA AND DOES 41 THROUGH 45.**

23 82. Young Women's Christian Association of Glendale, California is a corporation organized  
24 under the laws of California with its corporate headquarters and principal place of  
25 business in Glendale, California.

26  
27 83. At all times mentioned herein, said defendant has operated a domestic violence shelter.  
28

1 84. During the fiscal year 2001-2002, said defendant received financial assistance from the  
2 State of California.

3  
4 85. On December 9, 2002, Plaintiff called said defendant at its domestic violence hotline  
5 (818-242-1106) and informed said defendant that he needed shelter from domestic  
6 violence perpetrated against him. Said defendant refused to provide Plaintiff with shelter  
7 because he was a man.

8  
9 86. It is said defendant's policy to refuse to provide shelter to men.

10 87. Said action and policy violates Government Code Section 11135.

11  
12 88. Does 41 through 45 are responsible in some way for the discrimination alleged herein.

13 **TENTH CAUSE OF ACTION AGAINST JEWISH FAMILY SERVICE OF LOS**  
14 **ANGELES AND DOES 46 THROUGH 50.**

15  
16 89. Jewish Family Services of Los Angeles is a corporation organized under the laws of  
17 California with its corporate headquarters and principal place of business in Los Angeles,  
18 California.

19  
20 90. At all times mentioned herein, said defendant has operated a domestic violence shelter.

21 91. During the fiscal year 2001-2002, said defendant received financial assistance from the  
22 State of California.

23  
24 92. On December 11, 2002, Plaintiff called said defendant at its domestic violence hotline  
25 (818-505-0900) and informed said defendant that he needed shelter from domestic  
26 violence perpetrated against him. Said defendant refused to provide Plaintiff with shelter  
27 because he was a man.

28 93. It is said defendant's policy to refuse to provide shelter to men.

1 94. Said action and policy violates Government Code Section 11135.

2 95. Does 46 through 50 are responsible in some way for the discrimination alleged herein.

3  
4 **ELEVENTH CAUSE OF ACTION AGAINST COUNTY OF LOS ANGELES AND**  
5 **DOES 51 THROUGH 55**

6 96. County of Los Angeles is and at all times mentioned herein was a county in the State of  
7 California with the capacity to sue and be sued. County of Los Angeles, as a county in  
8 the State of California, is a political subdivision of the State of California.

9  
10 97. At all times mentioned herein County of Los Angeles has acted under color of state law.

11  
12 98. During the year preceding the filing of this action, County of Los Angeles funded  
13 domestic violence shelters that offer shelter only to female victims and that refuse shelter  
14 to male victims. Said shelters include the shelters named as defendants to this action.  
15 County of Los Angeles funded only one shelter that provides shelter to both male and  
16 female victims, Valley Oasis, which is on the Northern tip of the County and is too far for  
17 many male victims to travel to.

18  
19 99. Said activity constitutes illegal sex discrimination and violates the equal protection rights  
20 of Plaintiff and of male residents of the County of Los Angeles under the United States  
21 and California Constitutions, including State Constitution Article I, Section 7,  
22 Subdivision A.

23  
24  
25 100. Said activity also promotes a State law violation under Government Code Section 11135.

26 101. As a result of said actions, Plaintiff, male domestic violence victims who have seek  
27 shelter in California, and all male residents of the County of Los Angeles, have suffered  
28 and will continue to suffer hardship and actual and impending irreparable injury in that

1 County of Los Angeles funds and promotes discrimination against male victims of  
2 domestic violence in the services and outreach performed by organizations that it funds.  
3

4 102. Plaintiff has no adequate or speedy remedy at law for the conduct of County of Los  
5 Angeles described above. This action for injunctive relief is Plaintiff's only means of  
6 securing prospective relief.  
7

8 103. Does 51 through 55 are responsible in some way for the discrimination alleged herein.

9 **TWELFTH CAUSE OF ACTION AGAINST STATE OF CALIFORNIA DEPARTMENT**  
10 **OF HEALTH SERVICES AND DOES 56 THROUGH 60.**  
11

12 104. State of California Department of Health Services is and at all times mentioned in this  
13 complaint was a state agency with the capacity to sue and be sued.

14 105. During the year preceding the filing of this action, State of California Department of  
15 Health Services contracted with and funded the domestic violence shelters named as  
16 defendants in this complaint, and other similar programs, that provide shelter only to  
17 female victims of domestic violence but not to male victims of domestic violence.  
18

19 106. During the year preceding the filing of this action, State of California Department of  
20 Health Services entered contracts with domestic violence shelters named as defendants in  
21 this complaint, and other programs, using gender-specific language that excludes the  
22 male gender, even though males are also victims of domestic violence and need shelter.  
23

24 107. Said activity constitutes illegal sex discrimination and violates the equal protection rights  
25 of Plaintiff and of male residents of the State of California under the United States and  
26 California Constitutions, including State Constitution Article I, Section 7, Subdivision A.  
27

28 108. Said activity also promotes a State law violation under Government Code Section 11135.

1 109. As a result of said actions, Plaintiff, male victims of domestic violence who have sought  
2 shelter in California, and all male residents of the State of California, have suffered and  
3 will continue to suffer hardship and actual and impending irreparable injury in that State  
4 of California funds and promotes discrimination against male victims of domestic  
5 violence in the services and outreach performed by organizations that it funds.  
6

7  
8 110. Plaintiff has no adequate or speedy remedy at law for the conduct of State of California  
9 described above. This action for injunctive relief is Plaintiff's only means of securing  
10 prospective relief.  
11

12 111. Does 56 through 60 are responsible in some way for the discrimination alleged herein.

13 **PRAYER**

14 WHEREFORE, Plaintiff prays for judgment against each defendant as follows:

- 15  
16 (a) For an injunction permanently enjoining the denial of full and equal access to  
17 domestic violence shelter services by domestic violence shelters named as  
18 defendants in this complaint.  
19  
20 (b) For an injunction permanently enjoining County of Los Angeles from funding  
21 domestic violence shelters that refuse to provide shelter to victims based on sex.  
22  
23 (c) For an injunction permanently enjoining State of California Department of Health  
24 Services from funding and contracting with domestic violence shelters in a manner  
25 that discriminates against victims based on sex.  
26  
27 (d) For costs of suit incurred in this action;  
28  
(e) For reasonable attorney's fees; and,  
(f) For such other relief as the Court deems proper.



1                    Respectfully submitted,

2 Dated: October 16, 2003

LAW OFFICES OF MARC ANGELUCCI

3  
4                    By:

5                    \_\_\_\_\_  
6                    Marc Angelucci, Esq.  
7                    Attorney for Plaintiff,  
8                    Eldon Ray Blumhorst

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28