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Fatima R. dos Santos Fahmy, Pro Se  
email: fatimafahmy\_65@hotmail.com  
3440 Torrance Boulevard, Suite 104  
Torrance, California 90503  
Telephone: (310) 376-0076  
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FILED  
2008 FEB 20 PM 4:19  
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20 day  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

CV 08-1152-PSG (SHX)

Fatima R. dos Santos Fahmy,  
an individual,  
Plaintiff,  
  
v.  
  
Stephen Graham Hogge, a.k.a.  
Steven H. Graham,  
an individual, and Does 1-3,  
  
Defendants.

COMPLAINT FOR  
Defamation, Libel, Libel  
Per Se, Intentional and  
Negligent Infliction of  
Emotional Distress, Invasion  
of Privacy and Jury Demand

Plaintiff FATIMA RITA DOS SANTOS FAHMY, Pro Se, brings this  
action and hereby alleges as follows:

**JURISDICTION AND VENUE**

1. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §1332(a) in  
that the action is between citizens of different states and the amount in  
controversy exceeds \$75,000.00 exclusive of interest and costs. Venue is

SA

2/20/2008 4:18:42 PM Receipt #: 104538  
Cashier : ABELLAMY [LA 1-1]  
Paid by: ROBERT K DATES ATTY AT LAW  
2:CV08-01152  
2008-086900 5 - Civil Filing Fee(1)  
Amount : \$60.00  
2:CV08-01152  
2008-510000 11 - Special Fund F/F(1)  
Amount : \$190.00  
2:CV08-01152  
2008-086400 Filing Fee - Special(1)  
Amount : \$100.00  
Check Payment : 1490 / 350.00

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proper in this district pursuant to 28 U.S.C. §1391(a) in that the effects of the events or omissions giving rise to this action occurred in this judicial district.

2. Plaintiff Fatima R. dos Santos Fahmy is and was at all times relevant to this complaint, a citizen of the State of California.

3. Defendant, Stephen Graham Hogge, a.k.a. Steven H. Graham is and was at all times relevant to this complaint, a citizen of the State of Florida.

**PARTIES**

4. Plaintiff Fahmy is an attorney admitted to practice in the State of Florida. Ms. Fahmy is not a public figure nor has she sought recognition or notoriety by interjecting herself into any matter of controversy or public concern.

5. Defendant Hogge a.k.a. Graham is a non-practicing attorney admitted to practice in the State of Florida. Mr. Hogge/Graham is also the author and publisher of an interactive internet weblog, a “blog” entitled [www.HOGONICE.com](http://www.HOGONICE.com) wherein he pseudonymously publishes commentary, solicits commentary and engages in dialogue with anonymous fellow “bloggers” while maintaining sole and exclusive editorial discretion over all such blog postings known as “comment threads.”

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6. Ms. Fahmy and Defendant Hogge/Graham became acquainted in or about 1998 while both were law students at the University of Miami School of Law in Coral Gables, Florida.

7. Ms. Fahmy and the defendant maintained a short-lived platonic relationship while in law school which ceased shortly after graduation in May of 2000.

8. Defendant Hogge/Graham repeatedly, yet erroneously refers to Ms. Fahmy throughout his blog as his former girlfriend. Such an allegation is unequivocally false and delusional at best.

9. Defendant Does 1-5 are sued herein by fictitious names because their true names are unknown to Plaintiff at this time. Plaintiff will seek leave to amend her complaint to allege the true names and capacities of these defendants when they have been ascertained. Plaintiff is informed and believes in good faith and therefore alleges that the fictitiously named defendants are responsible in some manner for the actions and damages alleged herein.

10. Plaintiff is informed and believes and therefore alleges that Defendant Hogge/Graham published numerous false, defamatory and grossly injurious statements about her on the HOGONICE.com website which he then also linked to various other websites and search engines utilizing a method

1 known as “google bombing” to ensure that any internet searches for  
2 Plaintiff’s name would be directed to Defendant’s defamatory blog postings.

3  
4 11. Plaintiff Fahmy has not seen or spoken with Defendant Hogge/Graham  
5 in nearly eight years.

6  
7 12. Such statements were disseminated and available to a worldwide wide  
8 audience at the click of a mouse causing Ms. Fahmy nearly incalculable  
9 pain and suffering as well as damage to her reputation. Given the viral and  
10 far reaching scope of the World Wide Web, it is unlikely that such posts,  
11 once published, can ever be fully deleted or removed.  
12

13 **FIRST CAUSE OF ACTION FOR LIBEL**

14 (Defendant Hogge/Graham)

15  
16 13. Plaintiff incorporates by reference and realleges paragraphs 1 through  
17 12 inclusive as though fully set forth herein.

18  
19 14. On or about February 21, 2007, Defendant Hogge/Graham published a  
20 blog post on his HOGONICE.com site under the title heading “Help Me  
21 Find Fatima.” In that posting Defendant Hogge/Graham writes in pertinent  
22 part, “People always want to know the name of the deadbeat ex-girlfriend  
23 who borrowed \$3600.00 from me and kept it and then got me to guarantee  
24 and bar-study loan for her.” Further along in the article, he writes, “You  
25 know what? Screw it. Her name is Fatima Rita Dos Santos Fahmy. She  
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1 sometimes turns up in searches as Fatima Shutler or Fatima  
2 Dossantosfahmy or Fatima R. Fahmy. He goes on to publish in the blog  
3 what purports to be a letter to Plaintiff from Sallie Mae, a provider of  
4 student loans. Defendant goes on to state, "I doubt she has an employer.  
5 Work isn't her style," and, "... I have heard through the grapevine that she  
6 tends to get fired a lot."  
7  
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9 15. The foregoing underlined statements are false and defamatory to Ms.  
10 Fahmy in that she has never borrowed money from Defendant  
11 Hogge/Graham and she does not owe him any money. Hogge/Graham has  
12 never cosigned any loan of any type in any amount for Ms. Fahmy. In fact,  
13 Ms. Fahmy has requested that Defendant GH submit any documentation  
14 evidencing any debts owed to him by Plaintiff as well as any documentation  
15 evidencing GH as a cosigner on any loans. Defendant has failed to provide  
16 any such proof to date.  
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19

20 16. Plaintiff Fahmy is unaware of the name Fatima Shutler and has never  
21 used such a name or been known by this name or had any association with  
22 that name. Dossantosfahmy is a misspelling of Plaintiff's last name which is  
23 dos Santos Fahmy. In addition, the assertion that Ms. Fahmy is averse to  
24 productive work is ludicrous given that she endured the academic and  
25 financial burdens of obtaining her law degree and passing the Florida bar  
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1 examination all the while employed and caring for her mother who was at  
2 the time and is at present suffering from the advanced stages of Alzheimer's  
3 disease.  
4

5 17. Defendant Hogge/Graham made these defamatory statements with the  
6 knowledge that they were false  
7

8 18. These libelous statements expose Ms. Fahmy to contempt, ridicule, and  
9 obloquy and are reasonably susceptible of a defamatory meaning. Such  
10 false statements are particularly damaging to Ms. Fahmy in that as an  
11 attorney she is a member of a profession wherein integrity, honesty, and  
12 credibility are paramount. Moreover, she aspires to admission to the  
13 California Bar, a process that requires extensive and exhaustive background  
14 checks. Such defamatory postings would necessarily arouse the interest of  
15 the State Bar of California placing Ms. Fahmy in jeopardy of denial of the  
16 ability to practice her profession in this state.  
17

18 19. As an actual and proximate result of the above detailed conduct by the  
19 Defendant, Plaintiff suffered and continues to suffer general damages in an  
20 amount in excess of the jurisdiction of this court as to be determined at trial.  
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22 Additionally, Plaintiff requests an award of punitive damages in an amount  
23 to be determined at trial  
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1                                   **SECOND CAUSE OF ACTION FOR INVASION OF**  
2                                   **PRIVACY/FALSE LIGHT**

3                                   (Defendant Hogge/Graham and Doe Defendant One)

4 20. Plaintiff incorporates by reference and realleges paragraphs 1 through 19  
5 inclusive as though fully set forth herein.

6 21. Defendant's above referenced blog post generated a comment thread  
7 wherein numerous anonymous bloggers posted their own commentary in  
8 response to the article and in which Defendant could interactively engage in  
9 ongoing dialogue about his post.

10 22. One such anonymous blogger writes in pertinent part, "My condolences,  
11 Steve. Have you heard of Borderline Personality Disorder? Fatima sounds like  
12 classic BPD."

13 23. In response, Defendant Hogge/Graham writes, "I think she is much more  
14 likely to have Narcissistic Personality Disorder. Arrogant, believes she is a  
15 special person destined to achieve great things (in spite of great evidence to the  
16 contrary), envies other people and thinks she is envied, requires attention and  
17 adulation...that's Fatima. I don't know if she's bad enough to be formally  
18 diagnosed, but the NPD list fits her to a T. Also, when I knew her, it was my  
19 opinion that she had a serious drinking problem."



1 24. These false and unfounded statements were published with malice and  
2 with the intent to cast Ms. Fahmy in an extremely unfavorable and false  
3 light by imputing to her qualities and characteristics that she does not have  
4 and views that she does not hold.  
5

6 25. Statements suggesting that Ms. Fahmy suffers from either Borderline  
7 Personality Disorder or Narcissistic Personality Disorder are patently  
8 offensive and injurious to her reputation. Moreover these statements lack  
9 any basis in fact and were made solely to cause vexation and harm to her  
10 reputation.  
11

12 26. Ms. Fahmy does not now nor did she ever hold any of the beliefs  
13 attributed to her above.  
14

15 27. Ms. Fahmy does not now have nor at any time in the past has had a  
16 "serious drinking problem" as alleged by Defendant Hogge/Graham." The  
17 mere couching of the allegation of alcoholism in the form of an opinion  
18 does not absolve Defendant Hogge/Graham from culpability of the false  
19 claim.  
20

21 28. As a result of these statements, Defendants have intentionally and  
22 unreasonably attributed to Plaintiff objectionable views which she has never  
23 held and does not now hold in violation of Plaintiff's right not to have her  
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1 views misstated or distorted. Such attributions would be repugnant and  
2 highly offensive to a reasonable person.

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4 29. As an actual and proximate result of the above detailed conduct by the  
5 Defendants, Plaintiff suffered and continues to suffer general damages in an  
6 amount in excess of the jurisdiction of this court as to be determined at trial.  
7  
8 Additionally, Plaintiff requests an award of punitive damages in an amount  
9 to be determined at trial.

10 **THIRD CAUSE OF ACTION FOR**  
11 **INTRUSION AND DISCLOSURE**

12 (Defendant Hogge/Graham)

13  
14 30. Plaintiff incorporates by reference and realleges paragraphs 1 through  
15 29 inclusive as though fully set forth herein.

16  
17 31. On or about February 22, 2007, Defendant Hogge/Graham published a  
18 blog post on his HOGONICE.com site under the title heading "No Checks  
19 From Fatima Rita Dos Santos Fahmy." In that posting Defendant  
20 Hogge/Graham writes in pertinent part:

21  
22 a. "Amazingly, I have still not heard from Fatima Fahmy, the fine lady  
23 whose student loan I am paying off. *And for Google's sake*, let me say I  
24 mean "Fatima R. Fahmy," "Fatima Dossantosfahmy," or "Fatima R.  
25 Dossantosfahmy," AKA "Fatima Shutler." Italics added.

1 b. Continuing he writes, "You would think she would be eager to contact  
2 me, reimburse me and demand that I stop paying her bills. A few kind  
3 people have looked in the obvious places and provided me with old  
4 addresses. I appreciate it, but of course, I already have that stuff."

5  
6 c. "What I really need is her employer's name, although I doubt she works.  
7  
8 Unless what she did to me is considered "working," which is actually a  
9 pretty valid point of view, if you ask me.

10 d. "If I were her, I wouldn't want angry exes handing my Social Security  
11 number, aliases, and date of birth to anyone who offers to help, but I guess  
12 that's her choice."

13  
14 e. "So you will know, her Manhattan Beach address is a P.O. Box that  
15 probably isn't valid. Her Redondo Beach address is another poor guy she  
16 screwed over."

17  
18 32. The foregoing statements underlined are false and defamatory to  
19 Ms. Fahmy and were made by Defendant Hogge/Graham with the  
20 knowledge that they were false or with reckless disregard for their truth or  
21 falsity.  
22

23  
24 33. The statements in Paragraph 28 (a) and (b) are nonsensical and  
25 false in that Defendant Hogge/Graham has not been asked by Plaintiff to  
26 pay nor has he any obligation or authorization to pay student loans or any  
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1 other obligations on Ms. Fahmy's behalf. What is telling in (a) is that  
2 Defendant makes a point of emphasizing "for Google's sake" evidencing  
3 his deliberate and malicious intent and purpose of disseminating false and  
4 defamatory statement regarding Plaintiff Fahmy over as far reaching a  
5 medium as possible by assuring every possible spelling and even  
6 misspelling of Plaintiff's name is indexed and searchable in order to assure  
7 a successful search result on as many search engines and indices as  
8 possible.  
9

10  
11 34. The publication of the existence of Plaintiff's student loan and or its  
12 status constitutes an intrusion into her personal affairs and is not a matter of  
13 public concern.  
14

15 35. This intrusion is not justified by any legitimate motive.  
16 Defendant's pretextual claim that he was seeking to find Plaintiff's address  
17 is blatantly false insofar as Plaintiff, as a member of the Florida Bar, is  
18 required to and does maintain a current and accurate address which is  
19 readily accessible to anyone on the Florida Bar's website. Defendant's  
20 tactics for information collecting is highly offensive and serves no  
21 legitimate purpose other than to harass, embarrass, and intimidate Ms.  
22 Fahmy.  
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1 36. Defendant's conduct serves no socially sanctioned purpose and is  
2 outrageous and is highly offensive to reasonable people.

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4 37. As an actual and proximate result of the above detailed conduct by  
5 the Defendant, Plaintiff suffered and continues to suffer general damages in  
6 an amount in excess of the jurisdiction of this court as to be determined at  
7 trial. Additionally, Plaintiff requests an award of punitive damages in an  
8 amount to be determined at trial.  
9

10 38. The statements in Paragraph 28 (c) will be addressed below.

11  
12 39. The statements in Paragraph 28 (d) further illustrates the menacing  
13 and threatening nature of Defendant Hogge/Graham's conduct in that he  
14 evinces a willingness to publish Plaintiff's Social Security number and other  
15 identifying personal information to "anyone who offers to help" him in his  
16 destructive pursuit while maintaining the sham of identifying himself as  
17 Plaintiff's "angry ex."  
18

19  
20 40. In Paragraph 28 (e) Defendant Hogge/Graham asserts that  
21 Plaintiff's post office box mailing address "probably isn't valid" speaks to  
22 Defendant's intentional failure to reasonably ascertain the truth or falsity of  
23 his allegations in that the post office box at issue was at all times valid and  
24 continues to be valid to present. Defendant HOGGE/GRAHAM further  
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1 states that Ms. Fahmy's Redondo Beach address was that of "another poor  
2 guy she screwed over."

3  
4 41. This statement, which references Ms. Fahmy's former fiancé, is  
5 false in that Ms. Fahmy has never "screwed over" anyone at anytime for  
6 any reason in any location. Moreover, said statement is outrageous and  
7 beyond the scope of conduct Plaintiff should be subjected to in a civilized  
8 society. Such statements are highly injurious and grossly offensive to  
9 reasonable people. Said relationship is private and personal, is of not a  
10 matter of public concern and of no concern or consequence to Defendant  
11 Hogge/Graham. It most certainly is of no use in furthering his pretextual  
12 goal of locating Plaintiff's address.  
13  
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15  
16 **FOURTH CAUSE OF ACTION FOR LIBEL PER SE**

17 (Defendant Hogge/Graham)

18  
19 42. Plaintiff incorporates by reference and realleges paragraphs 1  
20 through 41 inclusive as though fully set forth herein.

21 43. In the HOGONICE.com blog post dated February 22, 2007 under  
22 the heading "No Checks From Fatima Rita Dos Santos Fahmy," Defendant  
23 HOGGE/GRAHAM writes in pertinent part, first, "What I really need is her  
24 employer's name, although I doubt she works. Unless what she did to me  
25 is considered "working," which is actually a pretty valid point of view, if  
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1 you ask me.” Next, in the subsequent related comment thread immediately  
2 following the post, Defendant GH further states in pertinent part, “I think  
3 any time a man signs a contract benefitting a woman he has seen naked,  
4 fraud in the inducement should be presumed.”  
5

6 44. These two statements whether uttered individually or in  
7 conjunction with the other are libelous per se insofar as the words used are  
8 tantamount to a charge of prostitution, a crime in this jurisdiction and as  
9 such subjects Ms. Fahmy to the contempt and scorn of the community at  
10 large, her peers and colleagues, friends, and prospective employers or  
11 clients.  
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13  
14 45. The assertion that Plaintiff engaged in illegal criminal sexual  
15 misconduct is highly offensive and injurious to Plaintiff’s reputation, the  
16 allegation is defamatory on its face and damages are presumed.  
17

18 46. Such allegations of meretricious conduct are intended to and do subject  
19 Ms. Fahmy to public scorn and contempt.  
20

21 47. Moreover, at the time during which the acts alleged were to have taken  
22 place, Defendant Hogge/Graham was quite proud to declare his status as a  
23 39 or 40 year old virgin who still lived in his father’s spare bedroom. Now,  
24 some 8 years later and approaching 50 years of age, Defendant still occupies  
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1 his father's guestroom and continues to celebrate his virginity even  
2 documenting it on his blog via a link entitled "Inadvertent Celibacy."

3  
4 48. As an actual and proximate result of the above detailed conduct by the  
5 Defendant, Plaintiff suffered and continues to suffer general damages in an  
6 amount in excess of the jurisdiction of this court as to be determined at trial.  
7  
8 Additionally, Plaintiff requests an award of punitive damages in an amount  
9 to be determined at trial.

10 **FIFTH CAUSE OF ACTION FOR LIBEL PER SE**

11 (Defendant Hogge/Graham)

12  
13 49. Plaintiff incorporates by reference and realleges paragraphs 1  
14 through 48 inclusive as though fully set forth herein.

15  
16 50. Defendant HOGGE/GRAHAM statements that Ms. Fahmy  
17 fraudulently induced him, by conferring sexual favors, to lend her money  
18 and/or cosign her student loan that she failed to repay is tantamount saying  
19 that Ms. Fahmy committed a fraud on the Defendant. Fraud is a crime in  
20 the State of California and as such subjects Ms. Fahmy to the contempt and  
21 scorn of the community at large, her peers and colleagues, friends, and  
22 prospective employers or clients.  
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51. The assertion that Plaintiff engaged in illegal fraudulent misconduct is highly offensive and injurious to Plaintiff's reputation, the allegation is defamatory on its face and damages are presumed.

52. As an actual and proximate result of the above detailed conduct by the Defendant, Plaintiff suffered and continues to suffer general damages in an amount in excess of the jurisdiction of this court as to be determined at trial. Additionally, Plaintiff requests an award of punitive damages in an amount to be determined at trial.

**SIXTH CAUSE OF ACTION FOR INTENTIONAL  
INFLICTION OF EMOTIONAL DISTRESS**

(Defendantst Hogge/Graham and Doe Three)

53. Plaintiff incorporates by reference and realleges paragraphs 1 through 52 inclusive as though fully set forth herein.

54. Defendant GH has published numerous posts on his blog labeling Plaintiff Fahmy as a mentally ill alcoholic prostitute who stole Defendant's money and perpetrated financial fraud on him.

55. Additionally, Defendant has solicited aid from the general public via appeals on his blog under the pretext of ascertaining Plaintiff's address information by disclosing Plaintiff's private biographical and financial information to an unknown worldwide audience.

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56. One response to Defendant's online plea for help elicited the following from an anonymous blogger: "Holy crap...I live in Fremont. Glad she's gone (I'd hate it if the property values went down on her account), but at the same time, that means I can't - er - "send some friends" to her door. Ah, well...."

57. Such a response clearly illustrates the potential harm to Plaintiff, including physical bodily violence, brought about by Defendant's outrageous lies.

58. Defendant HOGGE/GRAHAM has acted with malice utilizing threats, intimidation, extortion, harassment and fear in unfairly attacking Ms. Fahmy's character.

59. This conduct by Defendant Hogge/Graham is extreme and outrageous and so far outside the scope of human decency so as to shock the sensibilities of any reasonable person.

60. Defendant Hogge/Graham acted with the intent to cause or with the reckless disregard for the probability of causing Plaintiff emotional distress.

61. Plaintiff Fahmy has suffered and continues to suffer extreme and severe emotional distress including anxiety, depression, panic, and fear.

62. As an actual and proximate result of the above detailed conduct by the Defendants, Plaintiff suffered and continues to suffer general damages

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in an amount in excess of the jurisdiction of this court as to be determined at trial. Additionally, Plaintiff requests an award of punitive damages in an amount to be determined at trial.

**SEVENTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION  
OF EMOTIONAL DISTRESS**  
(Defendant Hogge/Graham)

63. Plaintiff incorporates by reference and realleges paragraphs 1 through 62 inclusive as though fully set forth herein.

64. Defendant Hogge/Graham knew or should have realized that his conduct involved an unreasonable risk of causing distress to Plaintiff that might result in illness or physical bodily harm. Such harm should have been reasonably foreseeable to Hogge/Graham.

65. Defendant Hogge/Graham negligent conduct is the actual proximate cause of Plaintiff's injuries.

66. Plaintiff suffered and continues to suffer nausea, gastroenterological distress, headaches, and severe and dramatic loss of weight nearly equal to 20% of her pre-injury weight. Such weight loss is particularly troubling in that Ms. Fahmy has always been fairly slight in body size and weight to begin with.

67. Defendant's negligence is the proximate cause of the Plaintiff's distress.

1 68. As an actual and proximate result of the above detailed conduct by  
2 the Defendants, Plaintiff suffered and continues to suffer general damages  
3 in an amount in excess of the jurisdiction of this court as to be determined  
4 at trial. Additionally, Plaintiff requests an award of punitive damages in an  
5 amount to be determined at trial.  
6

7  
8 WHEREFORE, Plaintiff Fatima R. dos Santos Fahmy, prays this  
9 Honorable Court enter judgment against Defendant Hogge/Graham and  
10 Does 1 through 3 as follows:

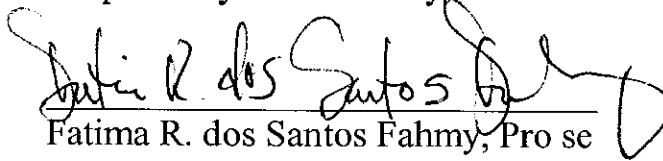
- 11 a. For actual damages according to proof;
- 12 b. For special damages according to proof;
- 13 c. For punitive damages in an amount to be determined at trial;
- 14 d. For pre and post judgment interest at the maximum rate allowed  
15 by law;
- 16 e. For any and all such other relief as the Court deems just and  
17 proper.  
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**DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury on all claims.

Respectfully submitted by



Fatima R. dos Santos Fahmy, Pro se  
3440 Torrance Boulevard, Suite 104  
Torrance, California 90503  
(310) 376-0076  
fax: (310) 792-1784  
email: fatimafahmy\_65@hotmail.com

Dated February 20, 2008

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY**

This case has been assigned to District Judge Philip S. Gutierrez and the assigned discovery Magistrate Judge is Stephen J. Hillman.

The case number on all documents filed with the Court should read as follows:

**CV08 - 1152 PSG (SHx)**

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

-----  
**NOTICE TO COUNSEL**

*A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).*

Subsequent documents must be filed at the following location:

**Western Division**  
312 N. Spring St., Rm. G-8  
Los Angeles, CA 90012

**Southern Division**  
411 West Fourth St., Rm. 1-053  
Santa Ana, CA 92701-4516

**Eastern Division**  
3470 Twelfth St., Rm. 134  
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

<b>I (a) PLAINTIFFS</b> (Check box if you are representing yourself) <input checked="" type="checkbox"/> Fatima R. dos Santos Fahmy	<b>DEFENDANTS</b> Stephen Graham Hogge a.k.a. Steven H. Graham and Does 1-3
<b>(b) County of Residence of First Listed Plaintiff</b> (Except in U.S. Plaintiff Cases): Los Angeles	<b>County of Residence of First Listed Defendant</b> (In U.S. Plaintiff Cases Only): Miami-Dade
<b>(c) Attorneys</b> (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Fatima R. dos Santos Fahmy, Pro Se 3440 Torrance Blvd., Suite 140 Torrance, CA 90503 310-376-0076	<b>Attorneys</b> (If Known)

<b>II. BASIS OF JURISDICTION</b> (Place an X in one box only.)  <input type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)  <input type="checkbox"/> 2 U.S. Government Defendant <input checked="" type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only</b> (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="border: none;"></td> <td style="border: none; text-align: center;"><b>PTF</b></td> <td style="border: none; text-align: center;"><b>DEF</b></td> <td style="border: none;"></td> <td style="border: none; text-align: center;"><b>PTF</b></td> <td style="border: none; text-align: center;"><b>DEF</b></td> </tr> <tr> <td style="border: none;">Citizen of This State</td> <td style="border: none; text-align: center;"><input checked="" type="checkbox"/> 1</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 1</td> <td style="border: none;">Incorporated or Principal Place of Business in this State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 4</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td style="border: none;">Citizen of Another State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 2</td> <td style="border: none; text-align: center;"><input checked="" type="checkbox"/> 2</td> <td style="border: none;">Incorporated and Principal Place of Business in Another State</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 5</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td style="border: none;">Citizen or Subject of a Foreign Country</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 3</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 3</td> <td style="border: none;">Foreign Nation</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 6</td> <td style="border: none; text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>	Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>																				
Citizen of This State	<input checked="" type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input checked="" type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

**IV. ORIGIN** (Place an X in one box only.)

1 Original Proceeding   
  2 Removed from State Court   
  3 Remanded from Appellate Court   
  4 Reinstated or Reopened   
  5 Transferred from another district (specify): \_\_\_\_\_   
  6 Multi-District Litigation   
  7 Appeal to District Judge from Magistrate Judge

**V. REQUESTED IN COMPLAINT:** JURY DEMAND:  Yes     No (Check 'Yes' only if demanded in complaint.)

**CLASS ACTION** under F.R.C.P. 23:  Yes     No                       **MONEY DEMANDED IN COMPLAINT:** \$ 75,000.00

**VI. CAUSE OF ACTION** (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)  
 28 U.S.C. 1332, 28 U.S.C. 1391

**VII. NATURE OF SUIT** (Place an X in one box only.)

<b>OTHER STATUTES</b> <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities /Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<b>CONTRACT</b> <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>TORTS</b> <b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input checked="" type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<b>TORTS</b> <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <b>FORFEITURE / PENALTY</b> <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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**VIII(a). IDENTICAL CASES:** Has this action been previously filed and dismissed, remanded or closed?  No     Yes

If yes, list case number(s): \_\_\_\_\_

**FOR OFFICE USE ONLY:** Case Number: \_\_\_\_\_

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA  
CIVIL COVER SHEET**

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

**VIII(b). RELATED CASES:** Have any cases been previously filed that are related to the present case?  No  Yes

If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

- (Check all boxes that apply)  A. Arise from the same or closely related transactions, happenings, or events; or  
 B. Call for determination of the same or substantially related or similar questions of law and fact; or  
 C. For other reasons would entail substantial duplication of labor if heard by different judges; or  
 D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**IX. VENUE:** List the California County, or State if other than California, in which **EACH** named plaintiff resides (Use an additional sheet if necessary)

- Check here if the U.S. government, its agencies or employees is a named plaintiff.  
 Los Angeles County

List the California County, or State if other than California, in which **EACH** named defendant resides. (Use an additional sheet if necessary).

- Check here if the U.S. government, its agencies or employees is a named defendant.  
 Florida, location of Doc defendants unknown

List the California County, or State if other than California, in which **EACH** claim arose. (Use an additional sheet if necessary)

- Note:** In land condemnation cases, use the location of the tract of land involved.  
 Los Angeles

**X. SIGNATURE OF ATTORNEY (OR PRO PER):** Justin N. dos Santos Date February 20, 2008

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))



**FOR OFFICE USE ONLY**

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

Fatima R. dos Santos Fahmy,  
an individual,  
PLAINTIFF(S)

v.

Stephen Graham Hogge, a.k.a.  
Steven H. Graham,  
an individual, and Does 1-3,  
DEFENDANT(S).

CASE NUMBER  
W 08-1152-PSG(SHX)

**SUMMONS**

**FOR OFFICE USE ONLY**

TO: DEFENDANT(S): STEPHEN GRAHAM HOGGE, a.k.a STEVEN H. GRAHAM, individual,  
and Does 1-3.

A lawsuit has been filed against you.

Within 20 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached  complaint  amended complaint  counterclaim  cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, Fatima R. dos Santos Fahmy, Rose, whose address is 3440 Torrance Blvd, suite 104, Torrance, CA 90503. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Clerk, U.S. District Court



Dated: February 20, 2008

By: \_\_\_\_\_  
Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency or is an officer or employee of the United States. Allowed 60 days by Rule 12(d)(3)]

**FOR OFFICE USE ONLY**