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| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):<br><b>BREANNA LOMBARDO, pro per</b> SBN:<br>35610 Monte De Oro<br>Temecula, CA 92592<br>TELEPHONE NO.: 951-764-0608 FAX NO.:                                      | <b>FOR COURT USE ONLY</b>  |
| ALL COURT FEE (Name):<br><b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE</b><br>STREET ADDRESS: 4050 Main Street<br>MAILING ADDRESS: P.O. Box 431<br>CITY AND ZIP CODE: Riverside, 92501<br>BRANCH NAME: Riverside Historic Courthouse |  |
| CASE NAME: <b>BREANNA LOMBARDO vs. RIP OFF REPORT.COM, a business entity of unknown form and; DOES 1 through 20, inclusive</b>  | CASE NUMBER:<br><b>RIC 10007577</b>  |
| <b>CIVIL CASE COVER SHEET</b><br><input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$25,000) <input type="checkbox"/> <b>Limited</b> (Amount demanded is \$25,000 or less)                                      | <b>Complex Case Designation</b><br><input type="checkbox"/> <b>Counter</b> <input type="checkbox"/> <b>Joinder</b><br>Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402) |
| JUDGE: _____ DEPT: _____  |  |

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

|   |   |  |
|---|---|--|
| <b>Auto Tort</b><br><input type="checkbox"/> Auto (22)<br><input type="checkbox"/> Uninsured motorist (46)<br><b>Other P/PI/D/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b><br><input type="checkbox"/> Asbestos (04)<br><input type="checkbox"/> Product liability (24)<br><input type="checkbox"/> Medical malpractice (45)<br><input type="checkbox"/> Other P/PI/D/WD (23)<br><b>Non-P/PI/D/WD (Other) Tort</b><br><input type="checkbox"/> Business tort/unfair business practice (07)<br><input type="checkbox"/> Civil rights (08)<br><input checked="" type="checkbox"/> Defamation (13)<br><input type="checkbox"/> Fraud (16)<br><input type="checkbox"/> Intellectual property (19)<br><input type="checkbox"/> Professional negligence (25)<br><input type="checkbox"/> Other non-P/PI/D/WD tort (35)<br><b>Employment</b><br><input type="checkbox"/> Wrongful termination (36)<br><input type="checkbox"/> Other employment (15) | <b>Contract</b><br><input type="checkbox"/> Breach of contract/warranty (06)<br><input type="checkbox"/> Rule 3,740 collections (09)<br><input type="checkbox"/> Other collections (09)<br><input type="checkbox"/> Insurance coverage (18)<br><input type="checkbox"/> Other contract (37)<br><b>Real Property</b><br><input type="checkbox"/> Eminent domain/inverse condemnation (14)<br><input type="checkbox"/> Wrongful eviction (33)<br><input type="checkbox"/> Other real property (26)<br><b>Unlawful Detainer</b><br><input type="checkbox"/> Commercial (31)<br><input type="checkbox"/> Residential (32)<br><input type="checkbox"/> Drugs (39)<br><b>Judicial Review</b><br><input type="checkbox"/> Assot tortiotturo (05)<br><input type="checkbox"/> Petition re: arbitration award (11)<br><input type="checkbox"/> Writ of mandate (02)<br><input type="checkbox"/> Other judicial review (39) | <b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b><br><input type="checkbox"/> Antitrust/Trade regulation (03)<br><input type="checkbox"/> Construction defect (10)<br><input type="checkbox"/> Mass tort (40)<br><input type="checkbox"/> Securities litigation (28)<br><input type="checkbox"/> Environmental/Toxic tort (30)<br><input type="checkbox"/> Insurance coverage claims arising from the above-listed provisionally complex case types (41)<br><b>Enforcement of Judgment</b><br><input type="checkbox"/> Enforcement of judgment (20)<br><b>Miscellaneous Civil Complaint</b><br><input type="checkbox"/> RICO (27)<br><input type="checkbox"/> Other complaint (not specified above) (42)<br><b>Miscellaneous Civil Petition</b><br><input type="checkbox"/> Partnership and corporate governance (21)<br><input type="checkbox"/> Other petition (not specified above) (43) |
|---|---|--|

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Remedies sought (check all that apply): a.  monetary    b.  nonmonetary; declaratory or injunctive relief    c.  punitive
4. Number of causes of action (specify): \_\_\_\_\_
5. This case  is  is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: April 16, 2010

BREANNA LOMBARDO, pro per  
(TYPE OR PRINT NAME)

*Brenna Lombardo*  
(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

**SUMMONS  
(CITACION JUDICIAL)**

**NOTICE TO DEFENDANT: RIP OFF REPORT.COM**, a business entity of  
**(AVISO AL DEMANDADO):** unknown form and; DOES 1 through 20, inclusive

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

APR 22 2010

V. Reyes  
*[Signature]*

**YOU ARE BEING SUED BY PLAINTIFF: BREANNA LOMBARDO**  
**(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.**

Tiene 30 DÍAS DE CALENDARIO después de que lo entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted puede usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desahar el caso.

The name and address of the court is:  
*(El nombre y dirección de la corte es):*  
Superior Court of California, County of Riverside  
4050 Main Street  
Riverside, California 92501

CASE NUMBER  
*(Número de caso)*  
**RIC 10007577**

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is: BREANNA LOMBARDO, pro per  
*(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):*

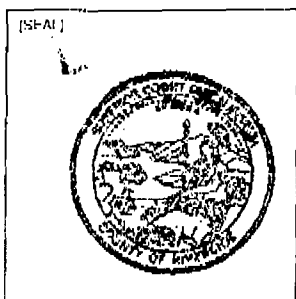
35610 Monte De Oro  
Temecula, CA 92592

951-764-0608

DATE: **APR 22 2010**  
*(Fecha)*

Clerk, by *[Signature]*, Deputy  
*(Secretario)* *(Adjunto)*

*(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)*  
*(Para prueba de entrega de esta citación uso el formulario Proof of Service of Summons. (POS 010)).*



**NOTICE TO THE PERSON SERVED:** You are served

- as an individual defendant.
- as the person sued under the fictitious name of *(specify):*
- on behalf of *(specify):* RIP OFF REPORT.COM  
under:  CCP 416.10 (corporation)  CCP 416.60 (minor)  
 CCP 416.20 (defunct corporation)  CCP 416.70 (conservatee)  
 CCP 416.40 (association or partnership)  CCP 416.90 (authorized person)  
 other *(specify):*
- by personal delivery on *(date)*

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE  
4050 Main Street  
Riverside, CA 92501  
www.riverside.courts.ca.gov

NOTICE OF ASSIGNMENT TO DEPARTMENT FOR CASE MANAGEMENT PURPOSES  
AND CASE MANAGEMENT CONFERENCE (CRC 3.722)

LOMBARDO VS RIP OFF REPORT.COM

CASE NO. RIC 10007577

This case is assigned to the Honorable Judge Gary B. Tranbarger in Department 07 as the case management department. The Case Management Conference is scheduled for 10/25/10 at 8:30 in Department 07.

The plaintiff/cross-complainant shall serve a copy of this notice on all defendants/cross-defendants who are named or added to the complaint and file proof of service.

Any disqualification pursuant to CCP Section 170.6(2) shall be filed in accordance with that section.

CERTIFICATE OF MAILING





I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the foregoing notice on this date, by depositing said copy as stated above.

Dated: 04/22/10

Court Executive Officer/Clerk

By:   
VERONICA REYES, Deputy Clerk

ac:cmc;cmcb;cmch;cmct;cmcc  
cmccb;cmch;cmct

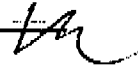
   

1 BREANNA LOMBARDO, pro per  
2 35610 Monte De Oro  
3 Temecula CA 92592  
4 (951)7640608

**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF RIVERSIDE

APR 22 2010

V. Reyes



5  
6  
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
8 IN AND FOR THE COUNTY OF RIVERSIDE  
9

10 BREANNA LOMBARDO,  
11 Plaintiff,

12 vs.

13 RIP OFF REPORT.COM, a business entity of  
14 unknown form and; and DOES 1 through 20,  
15 inclusive

16 Defendants.

Case No.

**RIC 10007577**

COMPLAINT FOR

1. DEFAMATION  
2. INJUNCTIVE RELIEF

[punitive damages Civil Code 3294]

17 Plaintiff, BREANNA LOMBARDO, alleges:

18 1. The true names or capacities, whether individual, corporate, associate or  
19 otherwise, of defendants, DOES 1 through 20, inclusive, are unknown to plaintiff, who  
20 therefore sues said defendants by such fictitious names. Plaintiff is informed and believes, and  
21 on such information and belief alleges, that each of the defendants designated herein as a DOI;  
22 is legally responsible in some manner for the events and happenings herein referred to, and  
23 proximately caused injury and damages thereby to the plaintiff as herein alleged.

24 2. Plaintiff is informed and believes, and on such information and belief alleges  
25 that defendant, RIP OFF REPORTS is a business entity of unknown form, doing business  
26 within the State of Arizona, with its principal place of business located in the County of  
27 Maricopa, and DOES 1 through 20, were, at all times herein mentioned, residents of the  
28 County of Riverside, State of California.

1           3.       At all times herein mentioned, each of the defendants were the agent, servant  
2 and employee of each of the remaining defendants and was at all times acting within the  
3 purpose and scope of said agency and employment.

4                               **ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

5           4.       Plaintiff owns and operates a sole proprietorship known as Lombardo Training  
6 Stables in the County of Riverside. On or about August 19, 2009 through February 12, 2010,  
7 Defendants and each of them posted false and defamatory statements about plaintiff on the  
8 website commonly known as www.ripoffreport.com. Defendants and each of them published  
9 the defamatory statements through electronic submission of said website. Specifically,  
10 Defendants and each of them made the following defamatory statements:

11           A.       This so called trainer cannot be trusted! I have heard no good reviews of her  
12 at all whatsoever. Her "barn" is completely unorganized and out of control. You  
13 end up paying hundreds of dollars a month for one of her students to ride your  
14 horse. SHE DOESN'T EVEN TOUCH IT!

15           B.       She takes advantage of anyone and everyone. She is beyond rude and  
16 disrespectful. She bears no common sense, yet any sense in any situation. Every  
17 horse in her responsibility comes up lame and with major health issues that will  
18 affect them for years to come.

19           C.       The horses are feed very poorly and you get the bare minimum for  
20 everything. She's horrible with kids and adults and everything in between. Her  
21 lessons consist of no learning and it's practically like paying her to stay on the  
22 ground and set up jumps that most of the time are paired with unsafe distances  
23 and interferences.

24           D.       The "pastures" are all dirt and weeds. The arena is choppy and rock-filled.  
25 The barns stalls have rough cement peeking through the little to no shavings.  
26 Breanna always thinks about herself and never the safety or well-being of  
27 others. She is a cheapskate and needs to be taken out of the horse world! She is  
28

1 a horrible, horrible, untrustworthy person and doesn't deserve the time of day in  
2 my book.

3 JUST BE SMART AND STAY AWAY FROM THE LOMBARDOS! (Unless  
4 you want a broken horse, then be my guest.)

5  
6 F. Bree Lombardo, Lombardo Training Stables, Breanna Lombardo Bree  
7 Lombardo- Horrible Trainer- Sells lame horses- Lies about horses she sells-  
8 Injured multiple horses in her barn and lied to owners! Horrible Horrible  
9 Dishonest Horse trader! Temecula California

10  
11 F. There is a "trainer" as she calls herself located in Temecula named Bree  
12 Lombardo. I bought a horse from her that was listed as "sound, and a safe kids  
13 horse", turns out the horse was not the age listed, had a hip injury and I was  
14 later told by someone who rides in her barn that the horse was constantly lame  
15 and had a massive abscess about a month before i bought the horse. I contacted  
16 her about this and she blew me off multiple times. Im speaking with a lawyer to  
17 persue legal action against her for lying on a sales contract.

18  
19 G. I spoke to many people about her and she has a horrible reputation. She was  
20 supposed to be training a clients horse to sell it and the horse came up lame, so  
21 instead of notifying the owner she continued to jump the holy hell out of this  
22 horse until he broke down completely. The owner of this horse was absolutley  
23 livid!

24  
25 H. She allows her beginner lesson students to ride the horses that are in training  
26 that only she is supposed to be riding. So she lies to the owners, charges them  
27 close to \$700 a month for board and training and does not even touch the horse!  
28 She is all about money and does not care about anyones safety nor the horses

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health conditions!

I. Do not buy horses from her! Had i known she gets these horses from horrible situations, then jumps the hell out of them until they blow out a tendon or break down i would have never even looked at her barn!!

J. All the major show barns in San Diego have warned me about her. Time and time again i hear about her shady buisness practices and the lame horses she pawns off on innocent people for a huge price tag... all smoke and mirrors!

K. Unfortunately since she refused to take the horse back and refund my money i had to run the horse through an auction. BEWARE!! She picks up broke down hags for free or less than \$300 and sells them in 2 months for 15k or more.

**FIRST CAUSE OF ACTION- DEFAMATION**

**(As against all Defendants)**

5. Plaintiff realleges and incorporates paragraphs 1 through 4 as though fully set forth herein.

6. Defendants and each of them posted false and defamatory statements about plaintiff on the website commonly known as www.ripoffreport.com. Defendants and each of them published the defamatory statements through electronic submission of said website.

7. Defendants and each of them knew that the above statements were false and defamed plaintiff. Defendants published the statement in reckless disregard of whether the matter was false and defamed plaintiff and defendants acted negligently in failing to learn whether the matter published was false and defamed plaintiff;

8. The publications and defamatory statements were defamatory on their face.

9. As a proximate result of the said negligence of defendants, and each of them, plaintiff sustained personal injuries throughout her entire body, all of which said injuries have





1 caused and continue to cause plaintiff great mental, psychological, physical and nervous pain  
2 and suffering. Plaintiff is informed and believes, and upon that information and belief, alleges  
3 that her injuries will result in some permanent disability to said plaintiff, all to her general  
4 damages in a sum within the jurisdiction of this Court.

5 10. As a further proximate result of the said defamatory statements of defendants, and  
6 each of them, plaintiff suffered substantial loss of earnings in her usual occupation, and  
7 plaintiff is informed and believes, and on such information and belief alleges, that she will be  
8 continue to suffer from future loss of earnings through said usual occupation for a period in  
9 the near future, and plaintiff will ask leave to amend this complaint to set forth the exact  
10 amount of her lost wages when the same have been ascertained.

11 11. Defendants' actions were done with malice, oppression and fraud and with a willful  
12 and conscious disregard for the rights of plaintiff, thereby subjecting defendants to punitive  
13 damages pursuant to California Civil Code Section 3294.

14 **SECOND CAUSE OF ACTION - INJUNCTIVE RELIEF**

15 (As against all Defendants)

16 12. Plaintiff realleges and incorporates paragraphs 1 through 11 as though fully set  
17 forth herein.

18 12. As a result of defendant's acts, plaintiff has sustained and will continue to sustain  
19 great and irreparable injury to her reputation and loss of business.

20 6. Plaintiff cannot be fully compensated in damages, and is without an adequate remedy  
21 at law because the exact amount of damage plaintiff will sustain will be difficult to determine,  
22 and Defendants' ongoing defamatory statements have and will continue to cause plaintiff  
23 irreparable loss of reputation and loss of business income in the future.

24 **WHEREFORE**, plaintiff, BREANNA LOMBARDO, prays for judgment against the  
25 defendants, and each of them, as follows:

26 **FIRST CAUSE OF ACTION**

- 27 1. General damages in a sum to be ascertained;  
28 2. All incidental expenses according to proof;

- 1           3.     All loss of earnings according to proof;
- 2           4.     For punitive damages pursuant to CC 3294;
- 3           5.     Costs of suit; and, prejudgment interest where appropriate;
- 4           6.     Such other and further relief as the court deems just and proper.

5 **SECOND CAUSE OF ACTION**

6           1. Temporary restraining order enjoining defendants from any continuing or further  
7 publication of any and all defamatory statements about Plaintiff on the internet or other  
8 sources.

9           2. preliminary and permanent injunction enjoining defendants from any continuing or  
10 further publication of any and all defamatory statements about Plaintiff on the internet or other  
11 sources.

12           3. Costs of this action and other just relief as the court deems just and proper.

13 Dated: April 7, 2010

BREANNA LOMBARDO

*B. Lombardo*  
pro per

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