

12/5/2011 9:02:37 AM

United States District Court for the District of Delaware

AZael DYTHIAN PERALES
POST OFFICE BOX 501
FULLERTON, CALIFORNIA 92836
(714) 507-9318

Plaintiff(s)

VS.

CIVIL ACTION NO. 11 - 1218

FULLERTON PUBLIC LIBRARY et.al,
353 W. COMMONWEALTH AVENUE
FULLERTON, CA 92836
(714) 738-6327

CITY OF FULLERTON et.al,
303 W. COMMONWEALTH AVENUE
FULLERTON, CA 92836
(714) 738-6317

GRIFFIN STRUCTURES, INC et.al,
385 SECOND STREET
LAGUNA BEACH, CA 92651
(949) 497-9000



DEC 12 2011

SWINERTON BUILDERS et.al,
260 TOWNSEND STREET
SAN FRANCISCO, CA 94107
(415) 421-2980

THE WHITE HOUSE et.al
1600 PENNSYLVANIA AVENUE
WASHINGTON, D.C.

CALIFORNIA GOVERNORS OFFICE
STATE CAPITOL BUILDING
SACRAMENTO, CA 95814
(916) 445-4633

Defendant(s)

COMPLAINT WITH JURY DEMEND

Section 1

- 1.) I ask the Court to respectfully proceed under "18 U.S.C.A. § 3237.(a)
- 2.) Offenses begun in one district and completed in another, Thank you.

Section 2

- 3.) All named Defendants are guilty of conducting the violation of § 1.01
- 4.) The Freedom of Information Act, 5 U.S.C. §552, As Amended by Public
- 5.) Law No. 99-570, §§ 1801-1804.By construction on our public library.
- 6.) As a result of the construction on the library I the Plaintiff do not have
- 7.) Access to Public information of 42 U.S.C. § 1983. The United States
- 8.) Codes Library was thrown in the trash according to Library employees
- 9.) In or around May 2010 according to the information I received when I
- 10.) To Reference the U.S.C. Library for research and work. I was told the

12/5/2011 9:02:37 AM

- 11.) Reason for the destruction of the U.S. Code Library is was that is was
- 12.) Out of date along with most government and legal information in
- 13.) Our Library here in the City of Fullerton. Most of this
- 14.) Information can be accessed on the internet, however due to the
- 15.) Construction the internet has been not working since June 18 2010.
- 16.) All Defendants have a responsibility to the Public to have ready
- 17.) Access by law, Public information; agency rules, opinions, orders
- 18.) Records and Proceedings. I currently have several cases before the
- 19.) Federal Courts in which I have been unable to access.(a) Each agency
- 20.) Shall make available information as follows which was violated by
- 21.) The named Defendants > (1.) Each agency shall separately state and
- 22.) Currently publish in the federal Registry for the guidance of the
- 23.) Public-(A) description of its central and field organization and the
- 24.) Established places} in this case the public library {at which, the
- 25.) Public may obtain information, make submittals or request, or obtain
- 26.) Decisions; (B) statements of the general course and method by which
- 27.) Its functions are channeled and determined, including the nature and
- 28.) Requirements of all formal and informal procedures available; (C)
- 29.) Rules of procedure, description of forms available or the places
- 30.) At which forms may be obtained, and instructions as to the scope
- 31.) And contents of all papers, reports or examination; (D) substantive rules

32.) Of general applicability adopted as authorized by law, and statements of

33.) General policy or interpretations of general applicability formulated and

34.) Adopted by the agency; and (E)(2)(A)(B)(C)each amendment, revision,

35.) Or repeal of The foregoing. Exempt to the extent that a person has

36.) Actual and timely Notice of the terms thereof, a person may not in any

37.) Manner be required To resort to just before, or be adversely affected by,

38.) a matter required To be Published in the Federal Register and not so

38.) Published. I was not given ample notice of amendments regarding this

39.) Controversy before the court. The internet and public access to the

40.) Federal Register was violated from June 18 2010 to June 22, 2010.

41.) Resulting in the violation of The Freedom of Information

42.) Act, 5 U.S.C. §552.

Section 3

43.) All named Defendants conduced the violation of U.S.C. Title 29

44.) Subchapter I – Protection of Employee Benefit Rights §.1001.

45.) Congressional findings and declaration of policy.

46.) (a) Benefit plans affecting interstate commerce and the federal

47.) Taxing power. I and employees with long term tenure of employment

48.) In the American workforce was unable to access applications on line

49.) And “Librarians” pay was cut by reduction in there hours and there

50.) Benefits were reduced which was facilitated by unnecessary Renovation

12/5/2011 9:02:37 AM

- 51.) Of the Public Library which will cost the tax payers 10 million dollars,
- 52.) I was directly affected by the library renovation because the hours of
- 53.) Operation was reduced and the Library is now going to be closed two
- 54.) Days out of the week, and I now have less of an opportunity to find
- 55.) Employment and “Benefits” on the internet, when prior to the remodel
- 56.) The library was Open Seven days a week. I have several prospective
- 57.) Employers that I was unable to apply for because applications are
- 58.) Accepted on line only i.e. (Best Buy) (Costco) Radio Shack) etc.
- 59.) The Defendants conduced the violation of The United States Freedom
- 60.) Of Information Act (National Labor Relations Board v. Robbins Tire &
- 61.) Rubber Co., (437 U.S. 214, 242 (1978) Established in 1966 The
- 62.) Freedom of Information Act established for the first time an effective
- 63.) Statutory right to access government information in which I was being
Section 4
- 64.) Denied by the named Defendants from June 18 2010 to June 22, 2010.
- 65.) I am asking requesting (\$ 30.000.000.00) Thirty million dollars
- 66.) To be awarded to me in punitive, compensatory and civil damages for
- 67.) Violations by the Defendants outlined in this complaint. Or I am
- 68.) Requesting an Award by the jury in the amount in which they feel is
- 69.) Applicable and just for the violations to the law and me the Plaintiff
- 70.) Outlined in this case before the court.

12/5/2011 9:02:37 AM

SIGNITURE

A handwritten signature in black ink, appearing to be 'A. Perales', written over a horizontal line.

Dated: 12 /05/ 2011

AZAEL DYTHIAN PERALES
POST OFFICE BOX 501
FULLERTON, CALIFORNIA, 92836

