

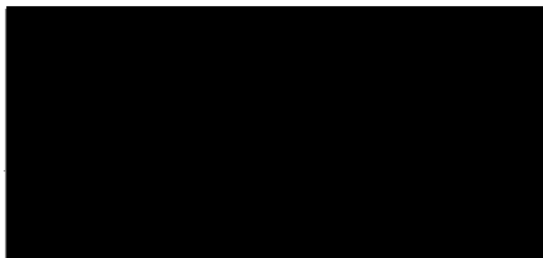
Private Attorneys General Act (PAGA) Notice
Submitted Pursuant to California Labor Code § 2699.3
Re: Labor Code, Public Policy, and RICO Violations

Private Attorneys General Act (PAGA) Notice of Labor Code Violations
Submitted under California Labor Code § 2699.3

Complainants and Authorized Enforcers:

Sherri-LaZelle: of the LaZelle family
Michael LaZelle, U.S. Air Force Veteran
Derivative Claimants, Whistleblowers, and Private Attorneys General
Acting under authority of:

- **California Civil Code §§ 3294, 5975 (Davis-Stirling Act)**
- **Labor Code § 2699 (PAGA – Private Enforcement Rights)**
- **Corporations Code § 17708.08 (Derivative Standing)**
- **U.S. Constitution and Public Trust Doctrine**



I. EMPLOYER/RESPONDENT NAMES:

- **Jeremy Yablan – Contractor License #759496**
- **Steven Waisbren, Esq. – Operating without legal capacity**
- **Martin Zaehring, Esq. – Court-appointed without consent**
- **Sabawoon “Sam” Shewa – Unlicensed property manager**
- **Christopher J. Weber Esq. – Active participant in fraud, aiding others**

II. ENTITIES:

1. Mountain Valley Homeowners Association (MVHOA)

- **Entity Name:** Mountain Valley Homeowners Association
 - **SOS Entity Number:** C1015863
 - **Entity Type:** Domestic Nonprofit Corporation
 - **Principal Address:** 2244 N Justin Ave, Simi Valley, CA 93065
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2. California HOA Solutions LLC (CHOAS)

- **Entity Name:** California HOA Solutions LLC
 - **SOS Entity Number:** 202108410004
 - **Entity Type:** Domestic Limited Liability Company
 - **Principal Address:** 5850 Canoga Ave Ste 400, Woodland Hills, CA 91367
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3. United Mechanical Contractors

- **Entity Name:** United Mechanical Contractors, Inc.
 - **SOS Entity Number:** C2371807
 - **Entity Type:** Domestic Stock Corporation
 - **Principal Address:** 794 East Los Angeles Ave, Simi Valley, CA 93065
 - **Contractor License Number:** 759496
 - **License Classification:** B (General Building), C-20 (HVAC)
 - **DIR Registration Number:** 1000004362
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4. Freeman Mathis & Gary LLP

- **Entity Name:** Freeman Mathis & Gary, LLP
 - **SOS Entity Number:** 201507200018
 - **Entity Type:** Foreign Limited Liability Partnership
 - **Principal Address:** 550 South Hope Street, Suite 2200, Los Angeles, CA 90071
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5. Philadelphia Indemnity Insurance Company

- **Company Name:** Philadelphia Indemnity Insurance Company
 - **California Company ID #:** 3576-6
 - **NAIC #:** 18058
 - **Date Authorized in California:** January 27, 1993
 - **License Status:** Unlimited-Normal
 - **Company Type:** Property & Casualty
 - **State of Domicile:** Pennsylvania
 - **Principal Address:** One Bala Plaza, Suite 100, Bala Cynwyd, PA 19004
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III. ALLEGED LABOR CODE VIOLATIONS:

Complainant alleges the following violations against the above-named parties under the California Labor Code, Civil Code, and relevant public policy doctrines:

- **Labor Code § 98.6** – Retaliation against a whistleblower for reporting unlawful activity, including fraud, forgery, and misuse of court process.
- **Labor Code § 432.5** – Coercion to agree to unlawful or unenforceable legal agreements, including participation in defaulted HOA governance or silence regarding fraudulent filings.
- **Labor Code § 2802** – Failure to indemnify or protect a whistleblower for expenses incurred while defending against retaliatory legal actions, forged documents, and misuse of public systems.
- **Contractor Misconduct** – Unlicensed, uninsured, and fraudulent operations by United Mechanical Contractors and California HOA Solutions LLC (CHOAS), including payroll fraud, insurance evasion, and COVID-era PPP abuse.
- **Forgery and Judicial Process Abuse** – Fabrication and misuse of court documents (including Temporary Restraining Orders and affidavits), violating due process and creating retaliatory legal exposure for the complainant.
- **Fraud on the Court** – Active participation by attorneys and agents (including Steven Waisbren, Martin Zaehringer, and Christopher J. Weber) in misrepresenting parties' legal standing and filing documents on behalf of suspended or nonexistent entities.
- **Violation of Public Policy** – Systematic use of defaulted or defunct corporate shells (MVHOA, CHOAS) to retaliate against whistleblowers and obstruct legitimate claims. These acts undermine public trust and violate constitutional and statutory protections.

Contractor & Insurance Fraud

(Applies to: Jeremy Yablan, United Mechanical Contractors, MVHOA, CHOAS, and Philadelphia Indemnity Insurance)

- **Jeremy Yablan**, while operating under Contractor License #759496 (United Mechanical Contractors), used his licensed entity to **conduct Mountain Valley HOA board business, issue retaliatory communications**, and enforce unlawful board decisions—while concealing the actual source of direction and fiduciary misconduct.
- **United Mechanical Contractors** functioned not only as a construction business but as a **proxy shell used to harass, threaten, and retaliate** against whistleblowers and dissenting HOA members, including the complainant, through fraudulent notices, repair actions, and billing threats.
- **MVHOA and CHOAS** exploited United Mechanical's business status to **evade direct liability** for board-level decisions, while Jeremy acted in a dual role—contractor and covert HOA agent—without disclosure, member consent, or lawful process.
- **Philadelphia Indemnity Insurance**, acting as insurer to these parties, failed to investigate, revoke, or report known fraud and misuse of insurance-backed business status, in violation of **Insurance Code § 1871.4** and **§ 790.03(h)**, and enabling continued public deception and financial harm.
- These activities constitute contractor fraud, insurance fraud, civil retaliation, and use of a licensed business to **commit RICO predicate acts** under false color of authority.

IV. Judicial and Administrative Misconduct

(Applies to: Steven Waisbren, Martin Zaehringer, Christopher J. Weber, Jeremy Yablan, Sabawoon "Sam" Shewa, and Philadelphia Indemnity Insurance Company)

- **Knowingly filed and/or supported forged TROs, falsified affidavits, and other fraudulent court documents** to retaliate against protected whistleblowers and interfere with valid derivative actions—violating **Penal Code §§ 115, 118, 132**, and **Civil Code § 52.1** (Bane Act).
- **Misused judicial and administrative processes** to file unlawful restraining orders, contempt actions, and fraudulent criminal charges for the purpose of intimidation, retaliation, and obstruction of justice.
- **Violated due process and legal ethics** by appearing without client consent, failing to obtain lawful court appointments, and concealing conflicts of interest—especially where no Penal Code § 977(b) waivers were signed or disclosed.
- **Knowingly represented suspended, defaulted, and defunct entities** (MVHOA, CHOAS, United Mechanical Contractors), in violation of **Corporations Code §§ 17708.07, 17701.09**, and **Business & Professions Code §§ 6125–6126**, while filing documents as if those entities had standing.
- **Jeremy Yablan and Sabawoon Shewa** acted as shadow officers and unauthorized board members of MVHOA and CHOAS, issuing threats, enforcing illegal rules, and using contractor and management positions to file retaliatory documents and false claims.
- **Philadelphia Indemnity Insurance** enabled and insured the continued operations of fraudulent, suspended, or criminally-involved entities, despite documented evidence of court fraud and retaliation—constituting aiding and abetting, civil conspiracy, and violation of **Insurance Code § 790.03(h)** and **§ 1871.4**.
- This coordinated misconduct represents a pattern of **racketeering, public fraud**, and **targeted abuse of the legal system** to silence whistleblowers and protect a fraudulent enterprise operating through both public and private channels.

V. PAGA & RICO Extension – Derivative Liability Under Racketeering and Corporate Fraud Theories

Pursuant to **Labor Code § 2699(f)** (Private Attorneys General Act), **Corporations Code § 17708.08** (Derivative Standing), **Civil Code § 3294** (Malice, Fraud, Oppression), and **18 U.S.C. §§ 1961–1964** (Federal RICO), all named individuals and entities are **jointly and severally liable** for participating in, aiding, or profiting from a coordinated fraud and retaliation enterprise.

This RICO-qualified pattern includes:

- **Forged court documents** (e.g., TROs, affidavits, contempt filings)
- **Use of suspended or defaulted corporate shells** (MVHOA, CHOAS, UMC)
- **Contractor and insurance fraud to conceal retaliation**
- **Denial of constitutional rights, due process, and property protections**
- **Abuse of judicial process to intimidate, retaliate, or obstruct lawsuits**
- **Misrepresentation of standing, legal capacity, and agency authority in court**

These actions form a **systemic and deliberate racketeering enterprise** designed to suppress whistleblowers, silence derivative claimants, and obstruct lawful enforcement under state and federal law. The violations extend beyond labor code and implicate **federal mail fraud, wire fraud, false filings in public office, and obstruction of justice.**

This complaint proceeds under **dual sovereign authority**: as a **PAGA Private Attorney General under California law** and a **derivative claimant with RICO standing under federal statute.** All parties who aided or concealed the misconduct—including attorneys, insurers, and contractors—are liable.

VI. TIME PERIOD:

Violations began at minimum August 1, 2020, and continue through May 2025 (ongoing). No records, insurance policies, tax compliance, or wage statements have been produced despite demand and court process.

VII. STANDING AND AUTHORITY TO ENFORCE

As a **derivative claimant, whistleblower, and private attorney general**, Complainant asserts standing under **Labor Code § 2699(a)** and related doctrines, including:

- **Derivative fiduciary control** of Mountain Valley Homeowners Association (MVHOA) and affiliated entities (CHOAS, United Mechanical Contractors) under the **Davis-Stirling Act and Corp. Code § 17708.08**
- **Direct retaliation victim** under **Labor Code § 98.6**, including threats, forged filings, and abuse of public process
- **Whistleblower status** for exposing contractor fraud, insurance misconduct, and illegal use of suspended entities in court
- **Constitutional standing** to challenge misuse of public resources, denial of due process, and coordinated fraud under both state and federal law, including **18 U.S.C. §§ 1961–1964 (RICO)**

This standing is independent of employment and arises from **public interest harm**, fiduciary obstruction, and retaliation against legal participation.

VIII. DEMAND FOR INVESTIGATION AND RIGHT TO PROSECUTE

The **Labor & Workforce Development Agency (LWDA)** is hereby placed on **formal notice** of these violations.

Pursuant to **Labor Code § 2699.3(a)**, Complainant demands that the state either **intervene within the statutory period** or **defer to private enforcement**.

Absent timely intervention, Complainant will proceed to:

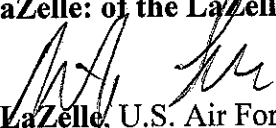
- **Pursue civil penalties and equitable relief** on behalf of the People of the State of California
- **Seek injunctive relief, contempt findings, and constitutional remedies** against retaliating parties
- **File or expand a parallel federal RICO enforcement complaint** against all named parties for obstruction, fraud, and civil conspiracy

This action is brought in the **public interest**, not for personal benefit, and is based on violations that implicate **systemic corruption, judicial fraud, and unlawful retaliation** under both California and federal law.

Executed this day: 5/14/2025

By:


Sherri-LaZelle: of the LaZelle family


Michael LaZelle, U.S. Air Force Veteran

Private Attorneys General / Derivative Claimants
Authorized Representatives of the Public Interest
Acting under authority of:

- Labor Code § 2699 (PAGA)
- Civil Code § 3294 (Fraud, Oppression, Malice)
- Corporations Code § 17708.08 (Derivative Actions)
- Davis-Stirling Act (Civil Code § 5975)
- U.S. Constitution and RICO Statutes (18 U.S.C. § 1964)

Pursuant to Labor Code § 2699.3, this notice is being formally submitted to the Labor & Workforce Development Agency (LWDA) via approved online portal and simultaneously served on all listed respondents via certified mail.