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Electronically
FILED
by Superior Court of California, County of San Mateo
ON **9/25/2023**
By /s/ Priscilla Tovar
Deputy Clerk

5
6 THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
7
8 IN AND FOR THE COUNTY OF SAN MATEO
9
10 *(Unlimited Civil Jurisdiction)*

11 BRADLEY JAY LUCAS

12 Plaintiffs,

13 v.

14 TRIPATINDER SINGH CHOWDHRY

15 Defendants.
16
17

Case No. 20-CIV-02204

SUPPLEMENT TO STATEMENT OF FACTS

Date: September 22, 2023

Location:

400 County Center
Redwood City, CA 94063

18 I, Tripatinder Chowdhry, respectfully submits this Supplemental to Statement of Facts:

19 Ms. Gail Kavanagh
20 Attorney
Burke, Williams & Sorensen, LLP
21 1 California Street
Suite 3050
22 San Francisco, CA 94111

September 22, 2023

23 Dear Ms. Kavanagh,

24 **SUB: Possible Violation of CA Rule 3.3, 5-100 and Misrepresentations**

25 I am not being represented by any lawyer in this matter.

26 Without prejudice, I notify you of your obligation to correct in the Court, the false statement in
27 CH-100 described below. Correcting the false statement and informing the Court that I never
28 brought a Chainsaw to your client, Bradley Lucas' house, does not violate any confidential
information.

1 **Rule 3.3(a)(1):**

2 "A lawyer shall not knowingly, make a false statement of fact or law to a tribunal, or fail
3 to correct a false statement of material fact, or law previously made to the tribunal by
4 the lawyer"

5 The false statement of fact signed by you and by your client Bradley Jay Lucas under penalty of
6 perjury in CH-100 -

7 "coming to my home with Chainsaw"
8 (Referring to me that I came to his home with a Chainsaw)

9 <https://www.dropbox.com/scl/fi/a3bowd3o195w6p4hr45ct/2-Chainsaw-Fraud-Perjury.pdf?rlkey=4x9m6w9ho9zrgnpx5mephpsa5&dl=0>

10 As you are aware, I never brought a chainsaw to your client, Bradley (aka Brad) Lucas' house. As
11 seen in the evidence above, there were two Sheriff's Deputies always present in front of your
12 client, Bradley Lucas' house, during the time period as claimed in the CH-100.

13 If in fact I, or anyone would have brought a chain saw to your client, Bradley Lucas' house, he
14 had ample opportunity to inform the Sheriff's Deputies who were always present in front of his
15 house, or would have informed the dispatch or filed a report with the Police a few days later.
16 But how could he have done that, if no such incident ever occurred.

17 However, to establish "credible evidence of violence", a necessary condition to obtain a
18 temporary restraining order, your client Bradley Lucas, lied under penalty of perjury, apparently
19 aided, abetted and encouraged by you. You assisted your client in obtaining a temporary
20 restraining order against me during a period when the Covid pandemic was rampant and the
21 Courts were running on very lean and limited resources.

22 You were fully aware at that time, since then and now, that I never brought a chainsaw to your
23 client, Bradley Lucas' house. But Bradley Lucas' statement in CH-100 under penalty of perjury
24 and also signed by you, satisfied the requirement that Lucas faced a "credible threat of
25 violence", in order to obtain a temporary restraining order against me.

26 As per California Rule 3.3(a)(1), you are required to inform the Court that I never brought a
27 Chainsaw to your client, Bradley Lucas' house. You have not informed the Court as yet.

28 Further, with his success and lack of any consequences, your client Bradley Lucas, apparently
with your aid, abetment and encouragement, has relentlessly embarked on more lies some of
which are in the links later in this email, including, under oath, that has caused immense harm to
me and my family.

California Rule 5-100 "Threatening Criminal, Administrative, or Disciplinary Charges to obtain an
advantage in a civil dispute":

You are also well aware that you have been put on notice for potential violation of California
Rule 5-100 "Threatening Criminal, Administrative, or Disciplinary Charges to obtain an
advantage in a civil dispute".

<https://www.dropbox.com/scl/fi/lu2sffxjsmhh7p4h4yeig/7.25.22-letter-to-Gail-Kavanagh.pdf?rlkey=33y8n0vp5e3r2333btzaphver&dl=0>

In your prickly saber-rattling letters below, providing an advantage to your client, Bradley Lucas,
you not only threatened criminal and disciplinary charges against me, but also misrepresented
at least twice, that the orange marks on Miramar Drive made by a licensed Civil Engineer, was
on your client, Bradley Lucas' property. Hermosa Avenue parcel has been described by metes

1 and bounds.

2 <https://www.dropbox.com/scl/fi/uqf5hnjbnp53p7601wkdp/5b-Kevanagh-Letter.pdf?rlkey=obqjti6zbug65xfjtk9s8yx79&dl=0>

3 <https://www.dropbox.com/scl/fi/mggy1gprj0nlyjsr2ycwf/6-7-27-22-Letter-to-Morehead.pdf?rlkey=sioo8namqevzpj8dc56okn95j&dl=0>

4
5 As shown below, shortly after your letters above, threatening criminal and disciplinary charges
6 against me and misrepresenting material facts, your client, Bradley Lucas, installed an
7 obstruction, in the form of a signage almost at the same spot of the orange mark (as shown in
8 the photo of your letter above), to obstruct my access to Hermosa Avenue affirmed by Court
9 Judgment in case 18-CIV-01684 as shown below. Your client, Bradley Lucas' installation of this
10 obstruction is a public and private nuisance apparently facilitated by you and your letters.

11 Lucas' signage Obstruction:

12 <https://www.dropbox.com/scl/fi/wj1nbin68xgxbrcqs2ly/7a-Two-Obstructions.jpg?rlkey=niv379kfhrlbulkt1fal9vym9&dl=0>

13 Please see below the location of Obstructions placed to obstruct my Court affirmed access over
14 Hermosa Avenue:

15 <https://www.dropbox.com/scl/fi/by6w8vw0wleb9kgsflall/7b-Location-of-Entrance-Obstruction.pdf?rlkey=bji73iercgid94zw9dc630qdq&dl=0>

16 Court Judgment in case 18-CIV-01684:

17 <https://www.dropbox.com/scl/fi/9cudjpsc6961o6zhbbhra/8-RECORDED-judgment-Singh-T.-1-00230935xBA0C1.pdf?rlkey=9snx62zfirwrkls58mpfoifh&dl=0>

18 In May, 2020 you were loitering, trespassing and spying on TEG Property. In your email you
19 stated that you were invitee of Mclvers. Mclvers, who came on TEG Property with their Vehicle
20 License Plates covered to commit illegal activities on TEG Property.

21 <https://www.dropbox.com/scl/fi/d9u5bvqzy51hgrh1ws57h/1-Gail-Kavanaugh-with-Lucas-Mclvers-Gang.pdf?rlkey=glbk0exaa7p131oca9ka8d98y&dl=0>

22 Please see below a few examples of your client, Bradley Lucas' course of conduct.

23 a. Please see link below, your client, Bradley Lucas placed Machete to intimidate me:

24 <https://www.dropbox.com/scl/fi/vmh5cyb7neqf63ggft1w8/4-Lucas-threatening-with-Machete.png?rlkey=2mpznvyubwth212p3bq8iitcq&dl=0>

25 b. Please see link below, your client, Bradley Lucas with Matt Dalton of 671 Hermosa
26 Avenue, who was arrested for Drug related activity, drinking and loitering on TEG
27 property:

28 <https://www.dropbox.com/scl/fi/dwfxulu6mk9u1j02g4eg8/5-Lucas-Dalton-Drinking-Trespassing-Loitering-defiantly-many-times-on-my-property.pdf?rlkey=qls96bkl6aniwtjm17ccscrq&dl=0>

c. Please see link below, your client Bradley Lucas using his children to fabricate evidences
to frame an innocent person:

<https://www.dropbox.com/scl/fi/5u4neow9pc8jhnsh4bcdl/6a-Lucas-Using-kids-to-Fabricate-Evidences.pdf?rlkey=9xb7wuqdzr5vk85xv6m8zorra&dl=0>

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Using children to fabricate evidences can be considered to be exploiting and abusing children:

Research in criminology and behavior including, the social learning theory (Albert Bandura, 1977, Saul McLeod 2016) have established that children pay attention to and identify with their parents and adopt observed behaviors, values and attitudes of the person they identify with, such as their parents.

"Kids have a habit of imitating their parents' criminal behavior"
- Fox Butterfield in the Atlantic 2018

In 2013, the American Psychiatric Association described **Child Psychological Abuse** as "nonaccidental verbal or symbolic acts by a child's parent that result, or have reasonable potential to result in significant psychological harm to the child."

I await for you to correct the false statement in Court, in compliance with California Rule 3.3(a)(1).

Sincerely
T Chowdhry