



E 6 2 8 4 9 A

COMPEX LEGAL SERVICES

Provider: HORSEMAN INVESTIGATIONS
Address: 16911 ALGONQUIN STREET
HUNTINGTON BEACH, CA 92648

Order #: E62849A
Claim #:
File#:

Telephone:

Records of: FULLERTON AQUATICS SPORTS TEAM

DOB:

SSN:

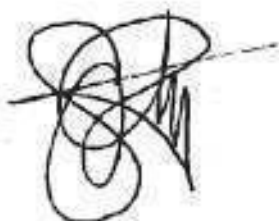
Case: RIANDA v GOLDEN WEST SWIM CLUB, ET AL.

Number of pages: 12

Records Requested: SPECIAL

Clause:

SEE ATTACHMENT



April 26, 2013

PLAINTIFF/PETITIONER: RIANDA	CASE NUMBER:
DEFENDANT/RESPONDENT: GOLDEN WEST SWIM CLUB, ET AL.	30-2012-00598426

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (name): ALICIA ALEGRIA Phone: _____

b. Address where served: 16911 ALGONQUIN STREET
HUNTINGTON BEACH, CA 92648

c. Date of delivery: 2/22/2013 12:47:00 PM

d. Time of delivery: 12:47:00

e. (1) Witness fees were paid.
Amount: \$ 15.⁰⁰

(2) Copying fees were paid.
Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date): _____

3. Person serving:

- (a) Not a registered California process server.
 (b) California sheriff or marshal.
 (c) Registered California process server.
 (d) Employee or independent contractor or a registered California process server.
 (e) Exempt from registration under Business and Professions Code section 22350(b).
 (f) Registered professional photocopier.
 (g) Exempt from registration under Business and Professions Code section 22451.
 (h) Name, address, telephone number, and, if applicable, county of registration and number:

COMPEX LEGAL SERVICES
325 Maple Ave
Torrance, CA 90503

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(For California sheriff, marshal or constable use only)
 I certify that the foregoing is true and correct.

Date: 2/22/2013 12:47:00 PM

Date: _____

Signature

Oscar Gomez

Signature _____



COMPEX

Legal Services, Inc.

ORDER NUMBER: EL2849-A Depo Date: _____ N/A

Records can only be verified by a Complex employee that has completed verification training and is certified to do so.

State: CA FL National NV AZ

Records CNR Verification by:

Agent Customer Service Call Center Production

Name: OSIA

Date: 4/25/13

Checklist:

PATIENT NAME	<input checked="" type="checkbox"/>
PATIENT AKA	<input type="checkbox"/>
DATE OF BIRTH	<input type="checkbox"/>
SOCIAL SECURITY NUMBER	<input type="checkbox"/>
LOCATION NAME	<input checked="" type="checkbox"/>
CUSTODIAN'S SIGNATURE	<input checked="" type="checkbox"/>
REASON FOR NO RECORDS	<input type="checkbox"/>

CLAUSE RESTRICTIONS:

SPECIFIC/LIMITED DATE RANGE	<input type="checkbox"/>
SPECIFIC/LIMITED BODY PARTS	<input type="checkbox"/>
TREATING PHYSICIAN	<input type="checkbox"/>
CLAIM/POLICY NUMBER	<input type="checkbox"/>
OTHER _____	<input type="checkbox"/>

Missing Records: Medical Billing Film Affidavit Other _____

Created Check-On: Yes No (If No, specify reason) _____

CNR Rejected: (specify reason for rejection)

Billing loc only Med recs not yet provided Recs at diff loc

Loc needs more info and attempted to obtain info from other recs rcvd

No Custodian Signature Per Client Preference/CS request

Incomplete CNR: _____

Other: _____

Notes/Comments:

10-042-41503
Inv.: Sean Hutchison
WKA Reports/as
Friday, October 1, 2010



Sean Hutchison

COMMENCED 5:45 AM DISCONTINUED 7:15 PM

Received details and departed my home office en route to the vicinity of 3449 Spectrum Drive in Irvine, CA. This is the alleged residence of the subject, Sean Hutchison.

6:15 am Arrived in the vicinity of the above address, secured a suitable surveillance position, and began surveillance activities. The residence can be described as an:

Upscale and secured multi-condo complex
with a secured garage.

The subject's name was not listed on the call box. Due to numerous vehicles parked inside the secured garage facility, I was unable to link the subject's at this time. Shortly after, I departed the area en route to _____ residence, located at _____

6:26 am I arrived in the vicinity of _____ residence. It was determined that she also resides in a secured, upscale, multi-apartment complex with numerous vehicles parked in the parking lot area. Unable to link a vehicle to _____ I departed the area en route to "Janet Evans Swim Facility," located at 801 West Valencia Drive in Fullerton, CA.

6:56 am I arrived in the parking lot of the swim facility and established a surveillance position.

7:10 am arrived on site driving a l
She exited her vehicle, opened the trunk, retrieved her gym bag, and walked towards the pool facility. **(Video Obtained)**

7:16 am Our subject, Mr. Sean Hutchison, who can be described as a:

Caucasian male in his late thirties,
with wavy, brown hair, prescription
glasses and attired in a white/green cap,
black sweater jacket, white T-shirt, and
olive green shorts,

arrived on site, driving a black two (2)-door BMW, California LP # 6JQB803. The subject exited his vehicle and walked towards the pool facility to greet his swimmers. **(Video Obtained)**

8:00 am I looked inside the interior of vehicle and observed fresh clothes from a cleaner.

8:01 am I looked inside the interior of our subject's vehicle and observed no useful information or items pertaining to the objective of our case.

10:51 am exited the facility and departed the area in the aforementioned **(Video Obtained)**

10:52 am The subject, Mr. Sean Hutchison, exited the facility with an unknown, Asian male. Shortly after, the subject entered his vehicle, alone, and departed the area. **(Video Obtained)**

11:31 am The subject returned to his residence as he parked his vehicle in the underground parking facility in guest parking space # 19. The subject entered the secured elevator and was lost to view. I drove around the guest parking lot and around the building to determine if vehicle was parked elsewhere. After canvassing the area, it was determined that vehicle was not present at this location. **(Video Obtained)**

1:30 pm No activity was observed.

3:30 pm No activity was observed.

4:34 pm I repositioned my vehicle to a more suitable surveillance position. As I repositioned my vehicle around the complex, I learned that the subject had departed unnoticed through the other exit point north of the building. I departed the area en route to residence.

5:08 pm Arrived in the vicinity of _____ residence. Her
aforementioned _____ was present.

5:11 pm _____ departed the area alone, driving the aforementioned
_____. I pursued her in order to see if she would lead me to the subject. (Video
Obtained)

5:22 pm _____ arrived at "Nordstrom," located at "Irvine
Spectrum." She exited her vehicle and entered the store. I eventually observed her
upstairs by the dressing room, conversing with employees. (Video Obtained)

6:32 pm - 6:34 pm _____ was observed departing alone and getting
onto the 5 Freeway northbound, traveling away from the direction of the subject's
residence. It should be noted that the subject resides approximately 1/2 a mile from the
"Irvine Spectrum."

7:00 pm With _____ traveling in the direction of her own residence,
I departed the area en route to my home office to file this report.

7:15 pm Upon arriving at my home office and filing this report, I discontinued
all surveillance activities regarding the subject, Sean Hutchison.

WKA Reports/as
Saturday, October 2, 2010



_____ and Mr. Hutchison exiting
the subject's residence

COMMENCED 5:45 AM **DISCONTINUED 8:15 AM**

Received details and departed my home office en route to the vicinity of 3449
Spectrum Drive in Irvine, CA. This is the aforementioned residence of the subject, Sean
Hutchison.

It should be noted I made a brief stop at _____ residence, located at
_____. I determined her vehicle was not present. I
continued en route to Mr. Hutchison's residence.

6:15 am Arrived in the vicinity of the above address, secured a suitable surveillance position, and began surveillance activities. The residence remained unchanged from our previous surveillance activities. There were two (2) vehicles visibly present at the residence, described as:

- 1) Aforementioned black BMW,
California LP # 6JQB803,
parked in space # 19,
registered to Sean Hutchison,
- 2) Aforementioned

parked in space # 45,
registered to

With both vehicles present at an early hour, it was determined and Mr. Hutchison were together at the subject's residence.

7:23 am The subject and exited the elevator of the complex, pulling luggage. They walked together toward their parked vehicle. rs entered her vehicle and departed the area. A couple minutes later, the subject entered his aforementioned black BMW and departed the area. **(Video Obtained)**

7:45 am With evidence that the twosome spent the night with each other, I departed the area en route to my home office to file this report.

8:15 am Upon arriving at my home office and filing this report, I discontinued all surveillance activity regarding the subject, Sean Hutchison.

In anticipation of litigation, this report is prepared at the request of counsel.

Horsemen

INVESTIGATIONS

Subject's Name: Mr. Sean Hutchinson
Adjuster Name: N/A
Client Claim Number: N/A
Horsemen Case Number: 10-042-41503
Date Worked: 10/01/10, Friday
Investigator Initials:



Mr. Hutchinson's residence



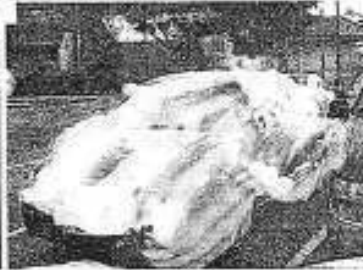
Mr. Hutchinson's vehicle



Mr. Sean Hutchinson (Coach)



residence



vehicle



(swimmer)

FRESNO

Corporate Office
16911 Algonquin Street
Huntington Beach, CA 92649
(800) 531-9997 (714) 840-7991
Fax-(714) 840-7981

LOS ANGELES

No Cal Office
3353 Bradshaw Road # 208
Sacramento, CA 95827
(800) 531-9997
Fax-(916) 364-7193

SAN DIEGO

000005

Horsemen

INVESTIGATIONS

Subject's Name: Mr. Sean Hutchinson
Adjuster Name: N/A
Client Claim Number: N/A
Horsemen Case Number: 10-042-41503
Date Worked: 10/02/10, Saturday
Investigator Initials: WKA



Subject's residence



Subject's vehicle



Vehicle at Subject's residence



Subject exiting from his residence



FRESNO

Corporate Office
16911 Algonquin Street
Huntington Beach, CA 92649
(800) 531-9997 (714) 840-7991
Fax-(714) 840-7981

LOS ANGELES

No Cal Office
3353 Bradshaw Road # 208
Sacramento, CA 95827
(800) 531-9997
Fax-(916) 364-7193

SAN DIEGO

000006

ACTIVITY

What time did you arrive at the assignment 6:10 am

ACTIVITY LOG**DOUBLE CLICK ANYWHERE BELOW (you wont see lines anymore) AND START TYPING**

START WITH ARRIVAL TIME AND ARRIVAL PLACE PLEASE!

DO NOT FORGET TO INCLUDE (VIDEO OBTAINED)!!!

6:10 am- I arrived in the vicinity of Mr. Sean Hutchinson's residence located at 3449 Spectrum Drive in Irvine, CA. The residence can be described as a very upscale and secured multi-complex w/large secured underground parking facility. The subject's name was not listed on the call box. Due to numerous vehicles parked inside the secured storage facility, I was unable to link the subject's at this time. Shortly after, I departed the area en route to [redacted] residence located at [redacted] Irvine, CA. (PS)

6:26 am- I arrived in the vicinity of [redacted] residence. It was also determined that she also resides in a secured upscale multi apartment complex w/numerous vehicles parked in the parking lot area. W/no way of linking vehicle to [redacted], I departed the area en route to "Janet Evans Swim Facility" located at 801 West Valencia Drive in Fullerton, CA. (PS)

6:56 am- I arrived in the parking lot of the swim facility and established a fix surveillance position. Our sole objective was to link both of our subject's vehicle when they arrived to practice since they both live in a very large and secured apartment building. (PS)

7:10 am- [redacted] arrived on site, driving a [redacted] [redacted] alighted her vehicle, opened the trunk, retrieved her gym bag, and walked towards the pool facility. (Video Obtained)

7:16 am- Our subject, Mr. Sean Hutchinson, arrived on site, driving a black 2 door BMW (CALP#6JQ8803). The subject alighted his vehicle and walked towards the pool facility to greet his swimmers. (Video Obtained)

8:00 am- I looked inside the interior of [redacted] vehicle and observed fresh clothes from a cleaner. (Observed Only)

8:01 am- I looked inside the interior of our subject's vehicle and observed no useful information or items pertaining to the objective of our case. After completing my inquiries, I chose to remain on site to follow our subject, Mr. Sean Hutchinson, after practice. It should be noted that information was recently obtained that [redacted] was believed to be going out of town on Saturday. We want to determine whether or not they are going to be together romantically after practice. (Observed Only)

10:51 am- [redacted] alighted the facility and departed the area in the aforementioned [redacted] (Video Obtained)

10:52 am- The subject, Mr. Sean Hutchinson, alighted the facility w/an unknown Asian male. Shortly after, the subject entered his vehicle alone and departed the area. (Video Obtained)

11:31 am- The subject returned to his residence as he parked his vehicle in the underground parking facility in guest parking space # 10. The subject entered the secured elevator and was lost to view. I drove around the guest parking lot and around the building to determine if [redacted] vehicle was parked elsewhere. After canvassing the area, it was determined that [redacted] vehicle was not present in and around the vicinity of the subject's residence. (Video Obtained)

After completing my investigation, I departed the area. (PS)

Upon arriving at the office, I discontinued all surveillance activities.

000008



UPDATE/REPORT

Use your tab key to move through form and answer information.
Move your cursor over the areas with red tabs for tips and instructions.

ASSIGNMENT				(Day)	(Month)	(Date)	(Year)
Claimant	Mr.	Sean Hutchinson	Case #	10-042-41503	Date Worked	Friday,	October 1, 2010
Your Initials	WKA		William Kimo Ard		Weather	Sunny; 85 degrees	
Has the case been worked before?	No		If yes, when	Your office		Huntington Beach	

This information is now needed EVERY TIME we work an assignment:				(Day)	(Month)	(Date)	(Year)
DOI	N/A	Adjuster	N/A	Date Assigned	Tuesday,	September 28,	2010
Insured	N/A		Claim #	N/A			
Claimant's Injury	N/A (Domestic Case)						
Purpose of Assignment	Determine if subject Mr. Sean Hutchinson is having romantic relationship w/						

HOURS, MILEAGE, VIDEO					
Commenced	5:45 AM	Discontinued	broke off -	Commenced	Discontinued
Hours Worked	Total To/From Miles EX: 45 (20+25)		88 (44X2)	Total On-Site Miles	
Expenses					
Total Video	Video of Claimant Only				

ON SITE INFORMATION		
Starting Address	3449 Spectrum Drive, Irvine, CA.	
Starting Address Description	Upscale and secured multi-condo complex w/secured garage facility	
Where was your surveillance position?	Guest parking lot	

VEHICLE DESCRIPTION AT "STARTING" ADDRESS		
(Year, Color, Make, Model, LP #, Parked Where?)		
Vehicle 1	Previously Described?	1st time observed Black 2 door BMW (CA.LP# 6JQB803) = was not located= R/O Sean Hutchinson
Vehicle 2	Previously Described?	1st time observed
Vehicle 3	Previously Described?	
Vehicle 4	Previously Described?	
Vehicle 5	Previously Described?	
Which of the above, if any, is the claimant's vehicle?		N/A

Only list vehicles present upon your arrival! List any additional vehicles in your activity log below.
If a vehicle has been described in a previous report, type "aforementioned" vehicle make. (ie. "aforementioned Toyota")

CLAIMANT INFO		
Description	Caucasian male in his late 30's, wavy brown hair w/grays, no facial hair, and wears prescription glasses	
Only describe the claimant if he/she has NOT been previously described		
Attire	White/green cap, black sweater jacket, white T-shirt, and olive green shorts	
Did the claimant Match the GIVEN description on the Assignment Sheet		
If the claimant changes clothes during surveillance, describe second outfit in your activity log below.		
Brace or Support?	Unknown	If yes, what
Pain or discomfort?	Unknown	If yes, how
Did you get hot?	No	If yes, how
Did the claimant drive?	Yes	Did you confirm ID? Yes.
Is claimant working?	Yes	If yes, where
Was the claimant home?	Yes	Was the claimant active? Yes

NOTES	
Did you pretext?	No.
Notes for next investigator:	This is domestic case.



UPDATE/REPORT

Use your tab key to move through form and answer information.
Move your cursor over the areas with red tabs for tips and instructions.

ASSIGNMENT				(Day)	(Month)	(Date)	(Year)
Claimant	Mr.	Sean Hutchinson	Case #	10-042-41503	Date Worked	Friday,	October 1, 2010
Your Initials	WKA		William Kimo Ard		Weather	Sunny; 85 degrees	
Has the case been worked before?	No		If yes, when	Your office		Huntington Beach	

DO I				(Day)	(Month)	(Date)	(Year)
DOI	N/A	Adjuster	N/A	Date Assigned	Tuesday,	September 28,	2010
Insured	N/A		Claim #		N/A		
Claimant's Injury	N/A (Domestic Case)						
Purpose of Assignment	Determine if subject Mr. Sean Hutchinson is having romantic relationship w/						

HOURS, MILEAGE, VIDEO			
Commenced	5:45 AM	Discontinued	7:15 PM
Hours Worked	13.50	Total To/From Miles EX: 45 (20+25)	88 (44X2)
Expenses	N/A		
Total Video	6 minutes and 25 sec		6 minutes

ON SITE INFORMATION	
Starting Address	3449 Spectrum Drive, Irvine, CA
Starting Address Description	Upscale and secured multi-condo complex w/secured garage facility
Where was your surveillance position?	Guest parking lot

VEHICLE DESCRIPTION AT "STARTING" ADDRESS		(Year, Color, Make, Model, LP #, Parked Where?)
Vehicle 1	Previously Described?	1st time observed Black 2 door BMW (CA LP# 6JQB803) = was not located= R/O Sean Hutchinson
Vehicle 2	Previously Described?	1st time observed
Vehicle 3	Previously Described?	
Vehicle 4	Previously Described?	
Vehicle 5	Previously Described?	

Which of the above, if any, is the claimant's vehicle? N/A

Only list vehicles present upon your arrival!!! List any additional vehicles in your activity log below.

If a vehicle has been described in a previous report, type "aforementioned" vehicle make. (ie. "aforementioned Toyota")

CLAIMANT INFO

Description	Caucasian male in his late 30's, wavy brown hair w/grays, no facial hair, and wears prescription glasses	
Only describe the claimant if he/she has NOT been previously described		
Attire	White/green cap, black sweater jacket, white T-shirt, and olive green shorts	
Did the claimant Match the GIVEN description on the Assignment Sheet		
<i>If the claimant changes clothes during surveillance, describe second outfit in your activity log below.</i>		
Brace or Support?	Unknown	If yes, what
Pain or discomfort?	Unknown	If yes, how
Did you get hot?	No	If yes, how
Did the claimant drive?	Yes	Did you confirm ID? Yes
Is claimant working?	Yes	If yes, where
Was the claimant home?	Yes	Was the claimant active? Yes

NOTES	
Did you pretext?	No.

Notes for next investigator: This is domestic case.



UPDATE/REPORT

Use your tab key to move through form and answer information.
Move your cursor over the areas with red tabs for tips and instructions.

ASSIGNMENT

	(Day)	(Month)	(Date)	(Year)
Claimant	Mr.	Sean Hutchinson	Case #	10-042-41503
			Date Worked	Saturday, October 2, 2010
Your Initials	WKA		Adjuster	William Kimo Ard
			Weather	Morning; 75 degrees
Has the case been worked before?	Yes		If yes, when	10/01/10
			Your office	Huntington Beach

This information is now needed EVERY TIME we work an assignment:

	(Day)	(Month)	(Date)	(Year)
DOI	N/A	Adjuster	N/A	Date Assigned
				Tuesday, September 28, 2010
Insured		N/A	Claim #	N/A
Claimant's Injury			N/A (Domestic Case)	

Purpose of Assignment Determine if subject Mr. Sean Hutchinson is having romantic relationship w/

HOURS, MILEAGE, VIDEO

Commenced	5:45 AM	Discontinued	8:15 AM	broke off -	Commenced	Discontinued
Hours Worked	2.50	Total To/From Miles EX: 45 (20+25)	88 (44X2)		Total On-Site Miles	0
Expenses	N/A					
Total Video	3 minutes and 15 seconds		Video of Claimant Only	3 minutes and 15 seconds		

ON SITE INFORMATION

Starting Address	3449 Spectrum Drive, Irvine, CA.	Starting Address Previously worked?	No
Starting Address Description	Previously Described		
Where was your surveillance position?	Guest parking lot		

VEHICLE DESCRIPTION AT "STARTING" ADDRESS

(Year, Color, Make, Model, LP #, Parked Where?)

Vehicle 1	Previously Described?	Aforementioned	Black 2 door BMW (CA.LP# 6JQB803) = Space # 19= R/O Sean Hutchinson
Vehicle 2	Previously Described?	Aforementioned	F
Vehicle 3	Previously Described?		
Vehicle 4	Previously Described?		
Vehicle 5	Previously Described?		

Which of the above, if any, is the claimant's vehicle? N/A

Only list vehicles present upon your arrival!! List any additional vehicles in your activity log below.

If a vehicle has been described in a previous report, type "aforementioned" vehicle make. (ie. "aforementioned Toyota")

CLAIMANT INFO

Description	Previously Described
-------------	----------------------

Only describe the claimant if he/she has NOT been previously described

Alibi	Not Observed
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Did the claimant Match the GIVEN description on the Assignment Sheet

if the claimant changes clothes during surveillance, describe second outfit in your activity log below.

Brace or Support?	Unknown	If yes, what	
Pain or discomfort?	Unknown	If yes, how	
Did you get hot?	No	If yes, how	
Did the claimant drive?	Yes	Did you confirm ID?	Yes.
Is claimant working?	Yes	If yes, where	each for F.A.S.T swim team @ Janet Evans facility located at 801 W. Valencia Dr. in Fullert
Was the claimant home?	Yes	Was the claimant active?	Yes

NOTES

Did you pretext?	No.
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Notes for next investigator: This is domestic case.

COMPEX LEGAL SERVICES

AFFIDAVIT - (Pursuant to Cal Evidence Code 1561)

E62849-A

I hereby declare under penalty of perjury that the following statements are true to the best of my knowledge and belief. I am over the age of 18 and the duly authorized custodian of records for:

HORSEMAN INVESTIGATIONS

16911 ALGONQUIN STREET, HUNTINGTON BEACH, CA 92648

and have the authority to certify that the records made available to COMPEX LEGAL SERVICES for reproducing are all of the records under my custody and control, described and called for in the SUBPOENA/Authorization served with this declaration in the matter relating to said individual or thing pertaining to:

RECORDS OF: FULLERTON AQUATICS SPORTS TEAM

AKA:

DATE OF BIRTH:

SOCIAL SECURITY #:

HOW ORIGINAL RECORDS WERE PREPARED

HANDWRITTEN NOTES

TYPED/DATA ENTERED

TRANSCRIBED

OTHER _____

TYPE OF RECORDS PRODUCED

MEDICAL

BILLING

FILMS

INSURANCE

EMPLOYMENT

PAYROLL

SCHOLASTIC

OTHER _____

Said records were prepared by personnel of the business in the ordinary course of business at or near the time of the act, condition, or event. I have delivered all of the records/items requested with the following exception(s):

SABRINA HOLGREN

CUSTODIAN NAME (PLEASE PRINT)

DEPARTMENT

SIGNATURE OF CUSTODIAN

DATE

I AM THE ATTORNEY'S REPRESENTATIVE AND I STATE THAT I MADE TRUE COPIES OF ALL THE ORIGINAL RECORDS DELIVERED TO ME BY THE CUSTODIAN OF RECORDS OF THE ABOVE LOCATION.

I DECLARE UNDER PENALTY OF PERJURY & UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

4-26-13 Reed

DATE

SIGNATURE

Lennard Johnson

PRINT NAME

PURSUANT TO BUSINESS & PROFESSIONS CODE SECTION 12462, I WILL MAINTAIN THE INTEGRITY & CONFIDENTIALITY OF ANY AND ALL INFORMATION OBTAINED, AND DISTRIBUTE THE RECORDS COPIED BY COMPEX LEGAL SERVICES TO THE AUTHORIZED PERSON OR ENTITIES.

SHAREDDECLFORM.DOC