

BRIGGS LAW CORPORATION [FILE: 1969.00]  
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Attorneys for Plaintiff Mark Lane

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

MARK LANE,	}	CASE NO. <b>'18CV1687 BEN NLS</b>
Plaintiff,		<b>COMPLAINT FOR DAMAGES AND DECLARATORY AND INJUNCTIVE RELIEF BASED ON VIOLATIONS OF CIVIL AND OTHER RIGHTS</b>
vs.		
BEN KALASHO; and DOES 1 through 100,		
Defendants.		

Plaintiff MARK LANE ("Plaintiff") allege as follows:

**Introductory Statement**

1. Plaintiff has been an advocate for social justice on a variety of issues throughout San Diego County for many years. One of the local public officials who abuses his office and the constituents he serves more than most is El Cajon City Councilman Ben Kalasho ("KALASHO"). Plaintiff has openly criticized KALASHO for abusing his office and the public. Rather than listening to Plaintiff and trying to learn from the criticism, KALASHO has shut him down.

2. KALASHO maintains a Facebook websites in order to communicate with the public about official City of El Cajon matters and other public affairs. Members of the public who do not air their concerns about KALASHO and keep their criticisms to themselves are allowed to post comments on his Facebook website. Plaintiff is not so lucky; he has been completely blocked from posting critical

1 or negative comments on this website. KALASHO has blocked Plaintiff as “pay back” for past  
2 criticism and to prevent him from publicizing his concerns in the future.

3 **Parties**

4 3. Plaintiff was at all relevant times a resident of the County of San Diego in the State of  
5 California.

6 4. Defendant KALASHO was at all relevant times a member of the City of El Cajon City  
7 Council. He is not currently being sued in an official capacity.

8 5. Plaintiff is informed and believes and on that basis alleges that, at all times stated in this  
9 pleading, each Defendant was the agent, servant, or employee of every other Defendant and was, in  
10 doing the things alleged in this pleading, acting within the scope of said agency, servitude, or  
11 employment and with the full knowledge or subsequent ratification of his principals, masters, and  
12 employers. Alternatively, in doing the things alleged in this pleading, each Defendant was acting alone  
13 and solely to further his own interests.

14 6. The true names and capacities of the Defendants identified as DOES 1 through 100 are  
15 unknown to Plaintiff, who will seek the Court’s permission to amend this pleading in order to allege  
16 the true names and capacities as soon as they are ascertained. Plaintiff is informed and believes and  
17 on that basis alleges that each of the fictitiously named Defendants 1 through 100 has some degree of  
18 liability to Plaintiff or has some other cognizable interest in this lawsuit.

19 **Jurisdiction and Venue**

20 7. This Court has federal-question jurisdiction over this lawsuit pursuant to Section 1983  
21 of Title 42 of the United States Code.

22 8. Venue is proper in this District pursuant to Section 1391 of Title 28 of the United States  
23 Code because a substantial part of the events or omissions giving rise to the claim occurred in the  
24 County of San Diego.

25 **FIRST CAUSE OF ACTION:**  
26 **Violation of Federal Constitutional Rights**  
(Against All Defendants)

27 9. The preceding allegations in this pleading are fully incorporated into this paragraph.

28 10. Plaintiff is informed and believes and on that basis alleges that at all relevant times:

1           A.     The cover photo of KALASHO's Facebook website identifies him as "Ben  
2 Kalasho (Councilman)." Whenever KALASHO posts to his Facebook timeline, the post's header  
3 identifies him as "Ben Kalasho – El Cajon Councilmember." A true and correct copy of this portion  
4 of KALASHO's Facebook website is attached to this pleading as Exhibit "A."

5           B.     The "Details About Ben" portion of the "About" section of KALASHO's  
6 Facebook website describes him as "Councilman." A true and correct copy of this portion of  
7 KALASHO's Facebook website is attached to this pleading as Exhibit "B."

8           C.     KALASHO's Facebook website includes a link to "BenKalasho.com." The  
9 "Meet Ben" portion of "BenKalasho.com" begins by describing KALASHO's feelings about "[b]eing  
10 on the City Council" and ends by letting readers know that he "want[s] to be as accessible as possible  
11 to my constituents." A true and correct copy of this portion of "BenKalasho.com" is attached to this  
12 pleading as Exhibit "C."

13           D.     KALASHO routinely posts to his Facebook website to engage with friendly  
14 members of the public on matters involving City of El Cajon business and other public affairs. A true  
15 and correct copy of examples of such posts is attached to this pleading as Exhibit "D."

16           E.     KALASHO uses his Facebook website to distribute information about the City  
17 of El Cajon and other public affairs and to allow members of the public other than Plaintiff to post  
18 comments. A true and correct example of an unblocked member of the public being allowed to post  
19 a comment (posted by Cory Briggs as "Testing 1, 2, 3") on one of KALASHO's Facebook posts on July  
20 24, 2018, is attached hereto as Exhibit "E."

21           F.     Plaintiff was blocked from posting comments on KALASHO's Facebook website  
22 after the latter began to be criticized by the former on City of El Cajon business and other public affairs.  
23 One more than one occasion – and as recently as July 24, 2018 – Plaintiff has attempted to access  
24 KALASHO's Facebook website but was unable to do so. The reason why he could not do so is that  
25 KALASHO has blocked him in retaliation for past criticism. A true and correct copy of the messages  
26 Plaintiff received when he attempted to access KALASHO's Facebook website on July 24, 2018, is  
27 attached hereto as Exhibit "F."

1 G. For purposes of members of the public exercising their free-speech and/or  
2 government-petitioning rights, the Facebook website maintained by KALASHO constitutes a public  
3 forum.

4 11. Defendants' retaliatory conduct as alleged in this pleading violated and continues to  
5 violate, among other things, Plaintiff's rights of free expression and to criticize the government as  
6 guaranteed by the United States Constitution.

7 12. Defendants' criticism-suppressing conduct as alleged in this pleading violated and  
8 continues to violate, among other things, Plaintiff's rights of free expression and to criticize the  
9 government as guaranteed by the United States Constitution.

10 13. As a result of Defendants' illegal conduct as alleged in this pleading, Plaintiff has  
11 suffered a legally cognizable injury in an amount to be proven at trial and has "chilled" his political  
12 speech for fear of being the victim of further retaliation and criticism suppression by Defendants and  
13 other public agencies and officials.

14 **SECOND CAUSE OF ACTION:**  
15 **Violation of State Constitutional Rights**  
(Against All Defendants)

16 14. The preceding allegations in this pleading are fully incorporated into this paragraph.

17 15. Defendants' retaliatory conduct as alleged in this pleading violated, among other things,  
18 Plaintiff's rights of free expression and to criticize the government as guaranteed by the California  
19 Constitution.

20 16. Defendants' criticism-suppressing conduct as alleged in this pleading violated, among  
21 other things, Plaintiff's rights of free expression and to criticize the government as guaranteed by the  
22 California Constitution.

23 **Prayer**

24 FOR ALL THESE REASONS, Plaintiff respectfully prays for the following relief against  
25 Defendants jointly and severally:

26 A. General, special, incidental, and/or nominal damages according to proof;

27 B. Punitive damages according to proof;

1 C. Any and all legal fees and other expenses incurred by Plaintiff in connection with this  
2 lawsuit, including but not limited to reasonable attorney fees and costs; and

3 D. Any and all further relief that this Court may deem appropriate.

4 Date: July 24, 2018.

Respectfully submitted,

5 BRIGGS LAW CORPORATION

6 By: s/ Cory J. Briggs

7 Attorneys for Plaintiff Mark Lane  
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## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

**I. (a) PLAINTIFFS**

MARK LANE

(b) County of Residence of First Listed Plaintiff San Diego County  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)  
BRIGGS LAW CORPORATION 909-949-7115  
Cory J. Briggs (State Bar no. 176284)  
99 East "C" Street, Suite 111, Upland, CA 91786

**DEFENDANTS**

BEN KALASHO; and DOES 1-100

County of Residence of First Listed Defendant San Diego County  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

**'18CV1687 BEN-NLS****II. BASIS OF JURISDICTION** (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question  
(U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                                   |   | PTF                        | DEF                        |
|---|----------------------------|---------------------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2            | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3            | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

**IV. NATURE OF SUIT** (Place an "X" in One Box Only)Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSD Title XVI <input type="checkbox"/> 865 RSI (405(g))	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input checked="" type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<b>PRISONER PETITIONS</b> <b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
		<b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act		
		<b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions		

**V. ORIGIN** (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Section 1983 of Title 42 of the United States Code

Brief description of cause:

Violation of Plaintiffs' free-speech rights

**VII. REQUESTED IN COMPLAINT:**

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$ >\$1.00 according to proof.

CHECK YES only if demanded in complaint: JURY DEMAND: ☒ Yes ☐ No

**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE

DOCKET NUMBER

DATE

07/24/2018

SIGNATURE OF ATTORNEY OF RECORD

s/ Cory J. Briggs

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE



# INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

## Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:


- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
  - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
  - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
- United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
- Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
- PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7.** Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.


**COMPLAINT FOR DAMAGES AND DECLARATORY AND INJUNCTIVE RELIEF  
BASED ON VIOLATIONS OF CIVIL AND OTHER RIGHTS**


Exhibit “A”





Home
Find Friends





**Ben Kalasho**  
 (Councilman)


Add Friend
 Message

Timeline
 About
 Friends 16 Mutual
 Photos
 More

DO YOU KNOW BEN?
 

To see what he shares with friends, send him a friend request.



 Add Friend



**Intro**


Lives in San Diego, California

Married to Jess Kalasho

BenKalasho.com


**Photos**



**Ben Kalasho** — El Cajon Councilmember
 21 hrs ·




I got a new cell number.  
 (619) KALASHO  
#BossLife


Like
 Comment
 Share

63

View 5 more comments



**Adi Satsangi** Ben Kalasho : ask fake news media to interview you on that number and pls make sure you give them your piece of mind

Like · Reply · 9h


**Thomas John Sargon** 619 is 619 upside down.

Like · Reply · 8h

Adi Satsangi replied · 2 Replies · 5 hrs



**Jack Sulaiman** I wouldn't call you.


1


Chat (9)


**COMPLAINT FOR DAMAGES AND DECLARATORY AND INJUNCTIVE RELIEF  
BASED ON VIOLATIONS OF CIVIL AND OTHER RIGHTS**

Exhibit “B”






Home
Find Friends







**Ben Kalasho**  
 (Councilman)






Timeline
About
Friends 16 Mutual
Photos
More ▾


DO YOU KNOW BEN?

To see what he shares with friends, send him a friend request.



 **About**

To see what he shares with friends, send him a friend request.



Overview

Work and Education

Places He's Lived

Contact and Basic Info

Family and Relationships

**Details About Ben**

Life Events

**ABOUT BEN**

No additional details to show


**OTHER NAMES**


**Councilman**  
 O her

**Ben J. Kalasho**  
 O her

**FAVORITE QUOTES**




If I'm in a political argument, I think I can, with reasonable accuracy and without boasting, put the other person's side of the case at least as well as they could. One has to be able to say that in any well-conducted argument.

 **Friends**



**Mutual Friends**

● Chat (9)

**COMPLAINT FOR DAMAGES AND DECLARATORY AND INJUNCTIVE RELIEF  
BASED ON VIOLATIONS OF CIVIL AND OTHER RIGHTS**

Exhibit “C”



[HOME](#)[MEET BEN](#)[PLATFORM](#)[GET INVOLVED](#)[DONATE](#)

## MEET BEN

New Leadership Delivering Results for Our Community

Being on the City Council is a responsibility I value greatly. I've always believed that local politics effects our lives more then State or even National. The decisions I will be making will have a direct effect on your safety, wallet and quality of life. It is for that reason that I entered politics. The desire to raise the standard of living for my community is to me the ultimate achievement a man can make. What better legacy to leave behind than the one of a person who comes into power and leaves a place more wonderful then he found it. What better way to honor a mans friends, neighbors and family than to ensure that their home is safer, that their children are getting a better eduction and that jobs are abundant. I chose the life of service because I was good at serving. Actually I was great at it. I saw things through the lens of pragmatism and simple common sense. I don't waste time meddling around with Politics. Instead, I spend hours a day on results. My hope is that you will notice positive changes in our city. And when you are driving, walking or biking through El Cajon, you will notice the many real changes I've made. I see a lot of potential in this city. I've met wonderful, passionate people along the way. I've been lucky to have been seated next to business leaders who understand the dynamics of commerce and economy. All these things I take with me. All the people I encounter are my teachers in this journey, whether they know it or not. Let it be known that I want to be as accessible as possible to my constituents. Feel free to contact me anytime you like.

Your obedient Servant.

*B. Kal*



### JOIN THE CAMPAIGN!






REGISTER TO VOTE!



**COMPLAINT FOR DAMAGES AND DECLARATORY AND INJUNCTIVE RELIEF  
BASED ON VIOLATIONS OF CIVIL AND OTHER RIGHTS**

Exhibit “D”

Ben Kalasho Timeline Recent

Add Friend

Lives in San Diego, California

Married to Jess Kalasho

BenKalasho.com

## Photos



## Friends

English (US) · Español · Português (Brasil) · Français (France) · Deutsch



Ben Kalasho — El Cajon Councilmember

July 3 at 8:40 PM

I was the only Councilman who voted NO on automatic raises for City Executives across the board. Check out this video! #Balls



959 Views

Like

Comment

Share

61

1 Share



Tim Deddeh Well stated Ben. Couldn't agree more with how raises shouldn't be viewed as on a block of positions but individually at the position. Like you said people do get complacent in positions and if they were to receive a raise by doing to bare minimum or lack there of you just wasted additional compensation that could have gone to training someone eager to excel in that position and earn a raise.

Like · Reply · 2w



Ben Kalasho Thanks Tim

Like · Reply · 2w



Write a reply...



Nick Ketelsen Well said, way to mlm speak up for the people.

Like · Reply · 2w



Ben Kalasho Thank you Nick

Like · Reply · 2w



Nick Ketelsen Absolutely, glad you are fight for what common



 Add Friend

BenKalasho.com

## Photos



## Friends

+

Facebook© 2018



**SanDiegoCounty.gov**

 Share

101

1 Share

[View 1 more comment](#)

**John Moreno** that double breasted vest tho 🔥🔥🔥

Like · Reply · 5w



**Jess Kalasho** You were splendid 😊👍

Like · Reply · 5w



**Loreana Wrench** both of you have a timeless beauty about you. no matter where in history you happened to find yourself you would be memorable

Like · Reply · 5w



Ben Kalasho replied · 1 Reply



Ben Kalasho Timeline Recent

Add Friend

BenKalasho.com

Photos



Friends

English (US) · Español · Português (Brasil) · Français (France) · Deutsch

Privacy · Terms · Advertising · Ad Choices · Cookies · More  
Facebook © 2018

Ben Kalasho — El Cajon Councilmember  
June 11 · Final Cut Pro X ·

Police station caught on fire twice and local government



1,7K Views

Like Comment Share

66

5 Shares

View 12 more comments

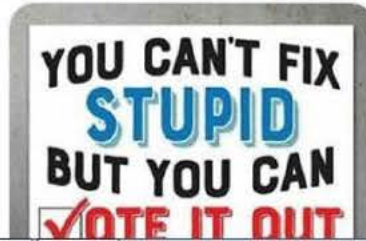
George Matti | see, thanks and keep it up.)  
Like · Reply · 5w

Alec Wood The old police station caught on fire May 17 and May 19. Both times during the day. They said the expected escrow to close in 30 days, which based on the date stamp of this video would have been June 8. Security should have been in place the days the old police station caught on fire. And should be backed up by occasional regular police patrols.

Like · Reply · 5w

Ben Kalasho replied · 1 Reply

Joe Jabara



**COMPLAINT FOR DAMAGES AND DECLARATORY AND INJUNCTIVE RELIEF  
BASED ON VIOLATIONS OF CIVIL AND OTHER RIGHTS**

Exhibit “E”

## Mobile Uploads



Like

Comment

Share

Tag Photo

Options

Send in Messenger

Like · Reply · 1w

 Mario Padilla replied · 2 Replies



**Russell Ekblom** Our government's got to realize pushing these people aside is not going to get rid of them. Treatment medical treatment can help a lot of these people get themselves out of there rut there in.. and until we change our medical system to where people can actually afford it without going broke this is what's going to continue to happening.. mental health is important... Poverty is real

Like · Reply · 6d

 Russell Ekblom replied · 2 Replies



**Nick Walker Hirsch** There's no single cause of homelessness, and no single solution, but I tend to be deeply skeptical of any version that tries to "fix" the problem by making it harder for desperate people to survive.

The job program is a step in the right direction, b... [See More](#)

Like · Reply · 5d



**Cory Briggs** Testing 1, 2, 3

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**COMPLAINT FOR DAMAGES AND DECLARATORY AND INJUNCTIVE RELIEF  
BASED ON VIOLATIONS OF CIVIL AND OTHER RIGHTS**

Exhibit "F"





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