

GBW | OUR METHOD FOR SUCCESS

HOW DID YOU WIN THAT CASE?

**Holding a Company Accountable
for Drunk Driving Motor Vehicle Crash
JULY 9 @10 AM**

[\$12 MILLION VERDICT]



Bruce Broillet

is a nationally recognized and respected trial lawyer. He has earned an impeccable reputation for his diverse legal achievements and landmark verdicts and settlements including a \$3.3 billion settlement against Big Tobacco on behalf of the County of Los Angeles. *Daily Journal* has recognized Mr. Broillet as one of California's *Top 100 Lawyers* over the past three years and listed him among the state's *Top Plaintiff Lawyers* from 2015–2020.



Alan Van Gelder

has an expertise representing clients in cases involving catastrophic personal injury, wrongful death, product liability, business litigation, and legal malpractice. He has successfully represented clients in numerous high-profile, complex cases, helping them to obtain multi-million-dollar verdicts and settlements against major corporations, State and City governmental entities, law firms, and celebrities.

MARCH 17, 2013

- **ST. PATRICK'S DAY - SUNDAY**



December 23, 2012

From: [Lance Sandman](#)
To: [Thomas A. George](#)
Subject: Re: Sindyay
Date: Sunday, December 23, 2012 3:46:41 PM

Xmas shopping and movie today, sorry but will do a raincheck for sure.

Best

On Dec 23, 2012, at 2:42 PM, "Thomas A. George" <toma011@sbcglobal.net> wrote:

Got time fr a pint at the Tamer Shanter?

From: [Lance Sandman](#)
To: [Thomas A. George](#)
Subject: Re: Yule Tide Party
Date: Thursday, November 29, 2012 11:32:12 PM

Would love to hook up tomorrow, but I have to be at an appointment at 6:00 PM.

Perhaps a brief Saturday rendezvous at a new watering hole that I have in mind?

Best,

On Nov 29, 2012, at 11:08 PM, "Thomas A. George" <toma011@sbcglobal.net> wrote:

Sir Lance,

No worries... It is Excellent!.... I'm still in awe with the tree and decorations!!.. I love it !!!

Perhaps a holiday beverage tomorrow evening?

Cheers!
Thomas

From: [Lance Sandman](#)
To: ["Thomas A. George"](#)
Subject: RE: Got that drinking feeling!
Date: Thursday, December 13, 2012 6:12:40 PM

And if drank'n don't kill meeee,,,,,, her memory will..... I can't take this much lonnnger, the way that I feel....

Lance W. Sandman, AMS[®], CCAM[®], CMCA[®]
General Manager
Prado Community Association
840 E. Green St., Ste. 100
Pasadena, CA 91101
626-229-0551 (Phone)
626-229-0550 (Fax)
lsandman@meritpm.com (Email)

A FirstService Residential Management Company

From: Thomas A. George [mailto:toma011@sbcglobal.net]
Sent: Thursday, December 13, 2012 6:08 PM
To: Lance Sandman
Subject: Fw: Got that drinking feeling!

Next round The Griffin!

From: Thomas A. George <toma011@sbcglobal.net>;
To: Lance Sandman <LSandman@meritpm.com>;
Subject: Got that drinking feeling!
Sent: Fri, Dec 14, 2012 12:58:04 AM

Im making the rounds.. Im at the Tam o Shanter and will be making my rounds!



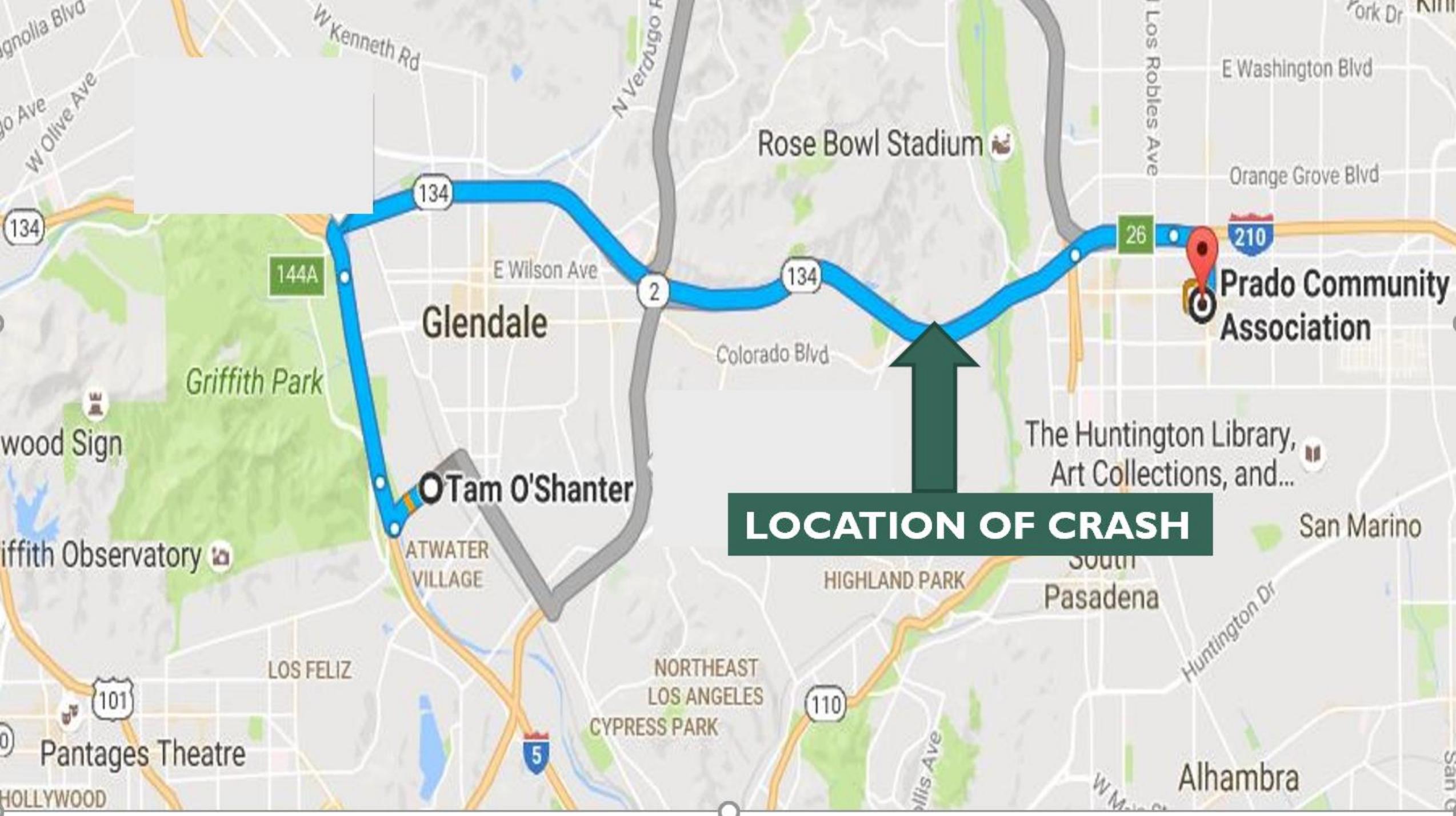
MARCH 17, 2013

- **ST. PATRICK'S DAY - SUNDAY**
- **LANCE SANDMAN AND TOM GEORGE ARE DRINKING AT TAM O'SHANTER**



MARCH 17, 2013

- **ST. PATRICK'S DAY - SUNDAY**
- **LANCE SANDMAN AND TOM GEORGE ARE DRINKING AT TAM O'SHANTER**
- **SANDMAN IS DRUNK AND SPEEDING AND CAUSES HORRIFIC CRASH**



Tam O'Shanter

LOCATION OF CRASH

Prado Community Association

Rose Bowl Stadium

Glendale

The Huntington Library, Art Collections, and...

San Marino

South Pasadena

HIGHLAND PARK

NORTHEAST LOS ANGELES CYPRESS PARK

Alhambra

Pantages Theatre

Griffith Park

LOS FELIZ

ATWATER VILLAGE

E Wilson Ave

Colorado Blvd

E Washington Blvd

Orange Grove Blvd

W Olive Ave

W Kenneth Rd

N Verdugo P

Los Robles Ave

Fork Dr

101

134

2

134

26

210

110

5



03.17.2013 18:58

MARCH 17, 2013

- **ST. PATRICK'S DAY - SUNDAY**
- **LANCE SANDMAN AND TOM GEORGE ARE DRINKING AT TAM O'SHANTER**
- **SANDMAN IS DRUNK AND SPEEDING AND CAUSES HORRIFIC CRASH**
- **SANDMAN IS ARRESTED FOR DUI**

Passenger (George): was contacted at Huntington Memorial Hospital and related in essence the following: Party #1 (Lance Sandman) came to his house at sometime in the early afternoon to pick him up. George and Lance are friends and work for the same company. They drove to Tam O'Shanter in Loz Feliz. They were at Tam O'Shanter for a few hours having some beers and talking with some girls. According to George, Lance also "had a few beers" while they were there. George thinks they left Tam O'Shanter around 5:00 P.M. It was Lance's car so Lance drove. Lance was taking George back to his house in Pasadena when the collision occurred. They were traveling eastbound on SR-134 at a high rate of speed, which George estimated to be in excess of 100 miles per hour. George said he asked Lance to "chill out." In an earlier statement to Officer Braun, #19603, George stated, "My friend was driving too damn fast." George told Officer Braun, "I was afraid." George told Lance, "Slow the fuck down." George was not sure what happened at the time of the collision, "I don't know who hit who or what hit what." George said he had ridden in the car with Lance before and that Lance drove the car fast because, "It was that kind of a car." George said he had never been in the car with Lance traveling as fast as they were at the time of the collision.



NOV 2013
California
BLEW BYE
CHALLENGER

LANCE SANDMAN



**“I only had
two beers.”**

DEFENSE TOXICOLOGIST MARTIN BREEN OPINIONS REGARDING LANCE SANDMAN

- e. Assuming an elimination rate of 0.015% BAC/hour, it is reasonably estimated the subject's blood alcohol concentration at the time of collision was between 0.20 and 0.22%. The amount of alcohol the subject consumed was totally absorbed by the time of the collision.
- f. At a blood alcohol concentration between 0.20 and 0.22%, the subject is over 2.5 times the legal limit in the State of CA (0.08%).

**13 glasses
of beer
(12 ounces)**

DEFENSE TOXICOLOGIST MARTIN BREEN OPINIONS REGARDING TOM GEORGE

5 George, even though he wasn't a driver -- he
6 was a passenger -- had a blood alcohol concentration of
7 .12 to .13, would basically demonstrate the same types
8 of symptoms and would be suffering impairment as a
9 passenger of his behavioral, mental cognitive, and
10 physical abilities.

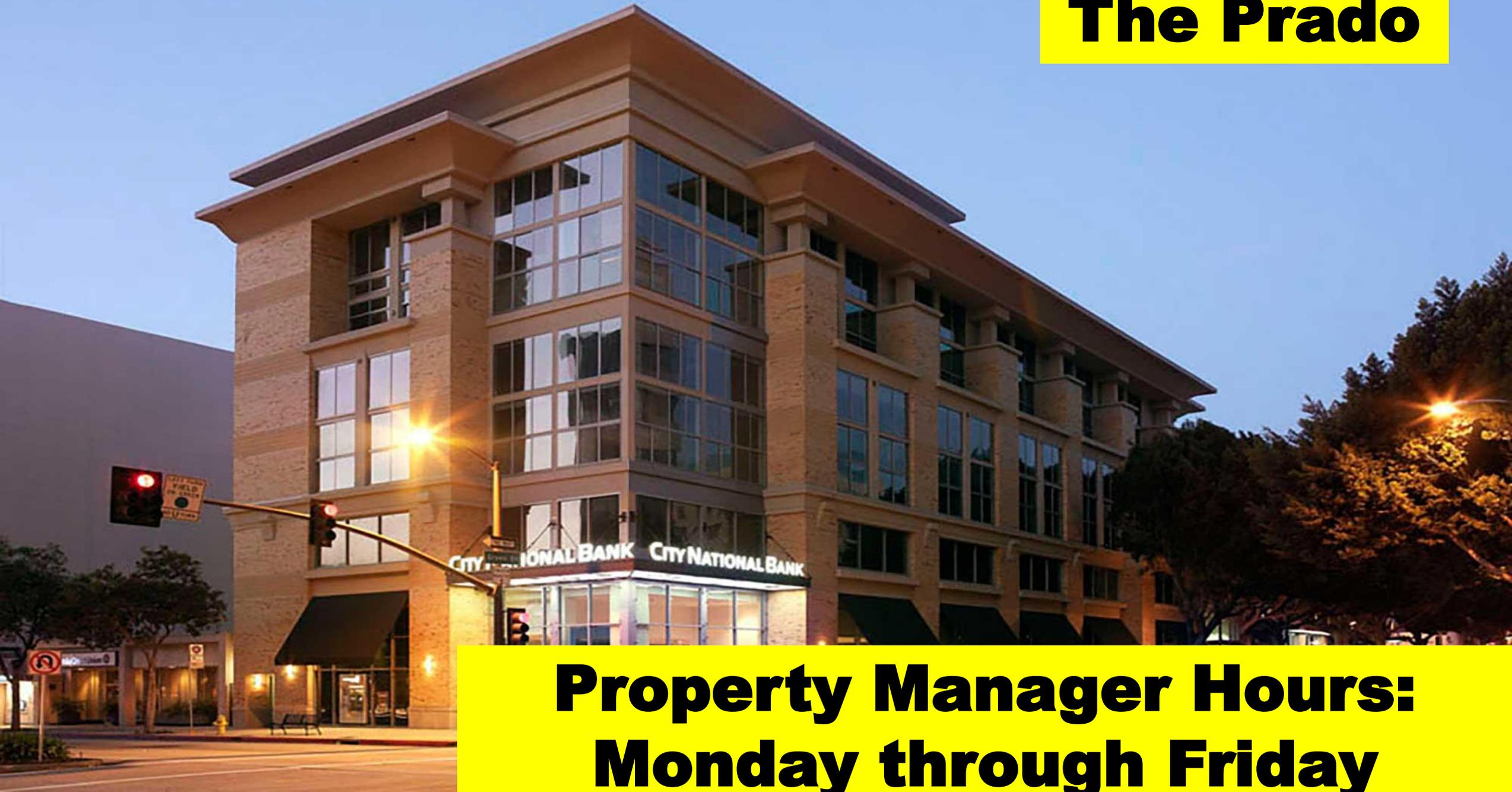
**8 glasses of beer
(12 ounces)**

DOES THIS LOOK LIKE SCOPE OF EMPLOYMENT?

SCOPE OF EMPLOYMENT

An employer is responsible for harm caused by the wrongful conduct of its employees while acting within the scope of their employment.

The Prado



**Property Manager Hours:
Monday through Friday**

PRADO BOARD

President:

Chris Krzak

Vice President:

Tom George

Secretary/Treasurer:

Regan Elliot

Member at Large:

Otto Petersen

FIRSTSERVICE RESIDENTIAL

(MERIT)

On-Site General Manager:

Lance Sandman

Sofia Alvarado

From: Lance Sandman [IMCEAEX- O=MERIT+20PROPERTY+20MANAGEMENT+2C+20INC+2E_OU=MERIT01_CN=RECIPIENTS]
Sent: Tuesday, October 02, 2012 4:52 PM
To: Jaclyn Schwerdt
Subject: RE: EPN and ADP Portal

October 2, 2012

Hi Jaclyn,

I am not planning to drive in the course of my duties at this time. If and when this situation changes, I understand that I can or should enroll at that time.

Best regards,

Lance W. Sandman, AMS[®], CCAM[®], CMCA[®]
General Manager
Prado Community Association

I am not planning to drive in the course of my duties at this time

MARCH 2013

					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	22	22	23



**ST. PATRICK'S
DAY**

**PRADO ST.
PATRICK'S
DAY PARTY**

DEVELOPING EVIDENCE OF SCOPE OF EMPLOYMENT

PURTON V. MARRIOT (2013) 218 CAL.APP.4TH 499

**RISK CREATED WITHIN SCOPE OF EMPLOYMENT
FOLLOWS EMPLOYEE**

**SO LONG AS EMPLOYEE IS RADIOACTIVE LIABILITY
FOLLOWS**

GET THE EMPLOYMENT FILE

- **INTERVIEWS/APPLICATIONS**
- **BACKGROUND CHECK**
- **LETTERS OF REFERENCE**
- **PERFORMANCE REVIEWS**
- **THOUSANDS OF PAGES OF EMAILS**
- **POLICIES AND PROCEDURES**
- **TRAINING MATERIALS**



HIDDEN GEMS IN THE EMPLOYMENT FILE

May 9, 2013

We understand that your doctor(s) have released, or will be releasing you to return to work on Monday. In light of the information that we have to date regarding the 3/17/13 accident, we need to complete a more thorough investigation into the underlying events and implications of those events before we can decide on a best course of action moving forward. As you know, your current position requires that you drive in connection with your job duties, and work closely with the Board at Prado. We need to be assured that you can do both safely and effectively before you return to full duties.

**WAS MIXING BUSINESS WITH PLEASURE
WITHIN THE SCOPE OF EMPLOYMENT?**

Encourage more social events for residents

EMPLOYEE INPUT FOR
5-YEAR DISCUSSION
2 Annual and/or 6 Mo Goals

**St. Patrick's Day
get together**

EMPLOYEE: Lance Sandman

UPDATE STATUS OF ESTABLISHED GOALS (2009 FORWARD)

Reference any of the following June 2009 Annual Review, 6 Month Review Jan 2010 Goals

Continue to pursue the PCAM designation. In progress GL - will be reliant on budget - but will try to move this forward with you.

Encourage more social events for residents. Completed - Pizza & Beer Event, St. Patrick's Day get together, 2nd Annual Yule Tide Party, 2nd Annual Cinco de Mayo Party and a Movie Night. GL - just an excellent job with all this. I think this is a large part of why you are getting so many rave reviews lately and the residents and Board feel so well taken care of. Kudos for a fantastic job!

Work with BOD in regard to obtaining health insurance for staff. The Board has opted not to pursue this goal at this time. GL - You did what you promised to do - so this is completed.

I think this is a large part of why you are getting so many rave reviews lately and the residents and the Board feel so well taken care of.



FirstService Residential Full-Service Community Association Management Services

FirstService Residential California has long been recognized as the residential property management

We care for the people and communities we serve as if they were family because to us that's exactly what they are.

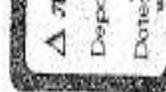
And with everything we do, we support your Board with a commitment to customer service and the local knowledge and insights that come from living, working and playing in the same neighborhoods they do.

Frequent Property Inspections and Community Standards Enforcement

We place a heavy focus on maintaining aesthetic standards of your community, including common areas,



MERIT Property Management, Inc.
 ANNUAL PERFORMANCE REVIEW PROCESS - JUNE 2009
 Non-Supervisory Employee



Name: Lance Sandman	Title: General Manager
Dept.: OC Urban	Hire Date: March 2007
Supervisor Name: Gregg Lotano	Review Period: 2008 - 2009

I often go out of pocket to ensure that HOA events such as Saturday Morning Coffee and Croissants ...

PERFORMANCE COMPETENCIES

Employee and Supervisor list specific examples of past work situations that demonstrated performance (great or poor) during the review period. Type in your examples in the boxes provided and put your initials after your comments to differentiate between self-assessment and supervisor assessment. Type your initials into the rating box you've selected as well. If there is a score in one of these two ratings, please be sure to add a specific goal for this competency to the goal section.

1. CUSTOMER SERVICE

Monitors customer satisfaction and follows up on customer inquiries, requests or complaints; or verifies understanding of customers needs or expectations and discusses options; Responds to problems; Partners with internal customers to meet demands of external customers; Willingly provides courteous service to internal/external customers. Please comment on client retention.

*Constantly does not meet expectations.	*Sometimes meets expectations.	Constantly meets expectations. LS
---	--------------------------------	--------------------------------------

Board of Directors, homeowners and vendors express satisfaction with the level of customer service. I often go out of pocket to with the Board, are planned for and executed successfully. LS

Supervisor gets fairly frequent e-mail copies and comments from Board members and residents regarding Lance's service to the detail, helping with community events; increasing the amenities and continual upgrading of service. He often stays late, will work please the client. GL

He often stays late, will work on the weekends and do whatever necessary to get the job done and please the client.

SUPERVISOR: Gregg Lotane

EMPLOYEE: Lance Sandman

May 2010

Often go
Board m
love you

This includes service above and beyond by way of the excellent social and community building events you create and produce. Just remarkable efforts here. You are ahead of the curve.

Customer Service: Excellent customer service skills. Often get glowing remarks or e-mails from Board members and residents alike. They really love you.

This includes service above and beyond by way of the excellent social and community building events you create and produce. Just remarkable efforts here.

Initiative: You are ahead of the curve. You keep ahead of the Board and you keep coming up with great ideas to improve the community (upgrade of Concierge service, wake up calls, events, sanitizing stations, etc.)

Decision Making: You can be relied upon to make good independent judgments and lead your Board appropriately.

Teaching/Mentoring: You have shown by your participating in leading training in Team Meetings, Urban Function Training and SF Urban Training that you are a natural teacher and are very skilled at communicating.

Manager Comments

Lance - you have continued to be a bright spot in Urban and in Merit. Your excellent management skills and the year to year to year happiness and satisfaction of the Board and client in general has been awesome. Your humor, your can do attitude, solution oriented, out of the box purveyor of fine events has made it so wonderful to work with you. I consider it an honor to have worked beside you and I thank you for the years of excellent work you have accomplished. I look forward to you continuing to do great things in the future.

Your humor, your can do attitude, solution oriented, out of the box purveyor of fine events has made it so wonderful to work with you.

MERIT

EMPLOYEE INPUT MID-YEAR DISCUSSION On 2010 Annual Assessment and 2011 Goals

Employee: Lance Sandman

Supervisor: Gregg Lotane

Date: June 2011

EMPLOYEE OVERALL COMMENTS ON 2011 ESTABLISHED GOALS & STATUS

Improve or replace the current Concierge service.

Completed. The Concierge Service has been changed and has dramatically upgraded the overall service of the association on behalf of its residents.

Review and revise the current rules & regulations and suggest changes or additions as required based on the Association's current needs.

In progress. A CC&Rs amendment process to effect changes in the assessment allocation and removal of Article 9 has been approved by the Board of Directors. Homeowners will have a chance to vote on these matters in October. A change to the rules prohibiting weekend move ins and outs, as well as large item deliveries was approved.

Attend a Merit Sales Presentation meeting.

Not completed. This goal will most likely not be met due to the current structure that is in place for meeting and presenting to potential new clients. I will continue to forward any information on potential leads that I might come across.

Pursue the PCAM designation.

scheduled for August 11 & 12 in Santa Ana, CA that I would

Encourage more social events for residents

ilding, and the equipment will be expandable and will allow management and the concierge staff to view

Encourage more social events for residents.

Completed. The movie theater has been upgraded with the latest in HD projection technology, a much larger viewing screen, Blue-ray player with Netflix & YouTube capabilities, wire less and HDMI access for Internet, video gaming and laptop presentations. The lighting scheme was reprogrammed and the walls repainted. This improvement was presented to the residents with a grand re-opening party that featured James Bond in Quantum of Solace and, for viewing of the NBA & NHL finals. Use of the theater is expected to increase greatly. With the ability to hook up an Xbox, PlayStation or Wii, residents and the association can have a greater variety of social events to attend.

(Employee)

Continue to build a strong working relationship with the board of directors and the general membership of the association.

(Manager)

You have demonstrated excellent customer service with your client (Board and residents alike), esp based upon their satisfaction level with your work. You often go above and beyond. This can be said of your relationship with vendors as well, and I am always seeing great effort in your relationship with client employees.

Continue to build strong working relationship with board of directors

You often go above and beyond.

From: [Lance Sandman](#)
To: [Gregg Lotane](#)
Subject: RE: What we provide under our full service management agreement
Date: Friday, February 11, 2011 3:00:42 PM

I spoke to Chris Krzak last night for a bit, updating him on some Prado going's on. So, I took the opportunity to again suggest that Merit can offer Prado a free website and that I could put the item on the next agenda. He agreed that Prado should have a website and that it would be great idea to use the one that Merit provides. Hence, you sending me the form.

I will try to make Merit as indispensable and intertwined to Prado as I possibly can.

Have a great week

Lance W. Sandman
General Manager
Prado Community
840 E. Green St., S
Pasadena, CA 9110
626-229-0551 (Phone)
626-229-0550 (Fax)
lsandman@meritpm.com (Email)

**I will try to make Merit as
indispensable and intertwined
to Prado as I possibly can.**

Business & Financial Acumen (Manager)	3 MEETS EXPECTATIONS	3 MEETS EXPECTATIONS
(Manager) Because of your good work we are able to take an increase in management fees in 2012.		

Because of your good work we are able to take an increase in management fees in 2012.

HIDDEN GEMS IN THE EMAILS

-----Original Message-----

From: Regan Elliott [<mailto:regan@dpquality.com>]

Sent: Thursday, May 26, 2011 10:14 PM

To: Prado Concierge; Lance Sandman

Cc: Chris Krzak; Thomas George (E-mail); Otto Petersen

Subject: Re: Prado Concierge | Movie Theater Grand Reopening 7pm Tonight!

Hi,

Just a suggestion about the June 4 visit to the Getty.

Because it is a full day activity, people need to preplan and it would be great if we had a large turnout for this.

Perhaps it would be a good idea to put an advert in the elevator and an Evite out ASAP.

Thanks.

Regan

From: [Lance Sandman](#)
To: personalchase@hotmail.com
Subject: FW: Prado Concierge | Movie Theater Grand Reopening 7pm Tonight!
Date: Friday, May 27, 2011 10:18:40 AM

Hi Chase,

I am sure that you working on this already and, now that we have a tentative date of June 12th, we can start the advertising.

Also, I want to change Ireland's 32 to another Irish Pub (and a little nicer) that is closer to the museum. I think that there is one called Clancy's on Wilshire Blvd. and one other. You can Google for Irish Bars on Wilshire Blvd. in Santa Monica and let me see what you find. I'll recognize it once I see it.

Best,

Lance W. Sandman, AMS®, CCAM®, CMCA®
General Manager
Prado Community Association
840 E. Green St., Ste. 100
Pasadena, CA 91101
626-229-0551 (Phone)
626-229-0550 (Fax)
lsandman@meritpm.com (Email)

-----Original Message-----

From: Regan Elliott [<mailto:regan@reganelliottmediation.com>]

Sent: Monday, August 20, 2012 3:04 PM

To: Lance Sandman

Subject: question

Hi, Lance.

Wow. Chris and David said that the lunch at Dr. W P was the best!!!

I saw the photo of the ribs on the website, and they looked great.

We should plan a Prado outing there.

From: [Lance Sandman](#)
To: ["Regan Elliott"](#)
Subject: RE: question
Date: Monday, August 20, 2012 3:31:41 PM

Hello Regan,

Yes, Doctor Hogly Wogly's Tyler Texas Style BBQ joint is really an L.A. treasure. I have a big smile on my face now just thinking about it. The sweet potato alamode was supreme. It makes you want to stand up and sing, "Deep in The Heart of Texas". I was thinking of a catered event at some point for Prado.

EMAILS SHOWED SANDMAN TRAVELING/SOCIALIZING WITH BOARD MEMBERS



- RESTAURANTS
- BARS
- DRIVING TOURS OF LOS ANGELES LANDMARKS
- DODGER GAMES
- PARTIES
- VISITS TO A RACETRACK



FEB 19 2016 13:34:17

CAN DRINKING ALCOHOL BE WITHIN THE SCOPE OF EMPLOYMENT?

CONDUCT IS WITHIN THE SCOPE OF EMPLOYMENT IF:

- A.** It is reasonably related to the kinds of tasks that Lance Sandman was employed to perform; or

- B.** It is reasonably foreseeable in light of the employer's business or Lance Sandman's job responsibilities.

However, all Employees are viewed as representatives of the Company, whether at work or participating in these events.

The Company, client, or vendor-sponsored activities, which may include the service of alcoholic beverages, are not included in this policy. However, all Employees are viewed as representatives of the Company, whether at work or participating in these events. The Company expects that such consumption will be in moderation so as not to reflect negatively on the Company's professional reputation. An Employee should not operate a motor vehicle or otherwise engage in any hazardous activity if the alcohol consumed would impair his/her ability to safely perform those functions. Employees are ultimately responsible for their choices and behavior regarding alcohol. Inappropriate behaviors and associated negative consequences of alcohol abuse or misuse will not be tolerated and may result in disciplinary action up to and including termination from employment.

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SCOPE OF EMPLOYMENT

An employee's unauthorized conduct may be within the scope of employment if the conduct was committed in the course of a series of acts authorized by the employer or the conduct arose from a risk inherent in or created by the enterprise.

SCOPE OF EMPLOYMENT

An employee's wrongful or criminal conduct may be within the scope of employment even if it breaks a company rule or does not benefit the employer.

SCOPE OF EMPLOYMENT

Social or recreational activities are within the scope of employment:

- A.** They are carried with the employer's stated or implied permission; and
- B.** They either provide a benefit to the employer or have become customary.

NEGLIGENCE

Negligence is the failure to use reasonable care to prevent harm to oneself or to others.

A person can be negligent by acting or by failing to act. A person is negligent if he or she does something that a reasonably careful person would not do in the same situation or fails to do something that a reasonably careful person would do in the same situation.

NEGLIGENT SUPERVISION AND RETENTION

TIMELINE

- **Hired: 3/12/07**
- **Arrested: 8/4/07**
- **Convicted: 9/6/07**
- **California License Suspended: 9/2007 - 3/2008**
- **Hides from FSR**
- **FSR learns after crash (6 years later)**

SANDMAN PRIOR DUI

- **Defense Pre-Trial Motion in Limine to Exclude GRANTED on grounds:**
 - a.) California Labor Code §432.7 and California Civil Code §1786.18.
 - b.) Remote in time.
 - c.) Prejudicial
 - d.) If Employer Didn't Know, Not Relevant

15 **II. THE 2007 DUI CONVICTION IS AT THE CENTER OF A SERIES OF COVER-**
16 **UPS TAKEN BY LANCE SANDMAN THAT SHOULD HAVE REVEALED TO**
17 **FSR THAT HE WAS UNFIT FOR HIS POSITION.**

18 To paraphrase a famous quote from Senator Howard Baker regarding the Watergate
19 scandal, “It’s not just the crime. It’s the cover-up of the crime that also causes the trouble.” The
20 same holds true for Mr. Sandman and his 2007 DUI conviction.

21 Mr. Sandman’s 2007 DUI conviction should have certainly been a red flag for FSR.
22 However, Mr. Sandman’s on going efforts between 2007 and 2013 to cover-up his 2007 DUI
23 conviction turned this red flag into something even more serious and troubling. His cover-ups
24 regarding his driving record hammered home his unfitness for the job the responsibilities given to
25 him by FSR.

26 By 2011 Mr. Sandman’s cover-ups about his driving record had grown so numerous and
27 outrageous that they finally began to attract the attention of the HR Department at FSR during an
28 audit of Mr. Sandman’s driving record. This was the golden opportunity to catch Mr. Sandman in

OFFER OF PROOF TO THE COURT

SANDMAN PRIOR DUI

- **At least 9 cover ups of the DUI**
- **FSR ignored 7 red flags**

JEAN SEAWRIGHT



ANGEL VAN DYCK OF FSR

- **SANDMAN GAVE HER FLORIDA LICENSE 2007-2011**
- **DID NOT CONSULT BACKGROUND CHECK FOR CALIFORNIA LICENSE**
- **DID NOT ASK SANDMAN FOR CALIFORNIA LICENSE UNTIL 2011**
- **DID NOT VERIFY THAT SANDMAN HAD A RESIDENCE IN FLORIDA**

From: Angel Van Dyck
Sent: Wednesday, July 20, 2011 3:23 PM
To: Lance Sandman
Subject: Drivers License- Update Request

We kindly ask that you apply for your California driver's license within the next 30 days and provide a copy to HR. If you have extenuating circumstances that compel you to have an out-of-state license, please let me know (for example, you still retain a residence in that state).

For more information including a fee calculator, visit <http://www.dmv.ca.gov/vr/newvehicle.htm>.

Thank you,

Angel Van Dyck
Human Resources Coordinator
The MERIT Companies

We kindly ask that you apply for your California driver's license within the next 30 days and provide a copy to HR.

Motor Vehicle Report

LICENSE NAME/ADDRESS

LANCE W SANDMAN
PO BOX 1945
ORANGE, CA. 92856-0945

LICENSE NUMBER -> S535-539-63-214-0

ORIG. ISSUED	ISSUED	EXPIRES	CLASS	STATUS
06/06/2000	05/12/2006	06/14/2012	E	ELIGIBLE

From: Jaclyn Schwerdt
Sent: Thursday, July 19, 2012 4:57 PM
To: Supervisors
Cc: Human Resources
Subject: Pull Program

****Please note: If an employee is not enrolled in the program but at some point drives and is involved in an accident, this creates liability for the company specifically in the event of property damage or harm.**

the program.

**Please note: If an employee is not enrolled in the program but at some point drives and is involved in an accident, this creates a liability for the company specifically in the event of property damage or harm. If an employee currently does not drive, but eventually adds driving to their job duties, be sure to contact HR about enrolling them in the program at the time of change.

As always, we appreciate your efforts and collaboration in completing this project.

Best,
Jaclyn Schwerdt
HR Coordinator
MERIT

HR IS TOLD SANDMAN NEEDS TO BE IN THE PULL PROGRAM

From: Andrew J. Schlegel
Sent: Friday, July 20, 2012 10:59 AM
To: Jaclyn Schwerdt
Cc: Joe Bolich; Valerie Strauch
Subject: RE: Pull Program

Everyone on the list under Joe Bolich, Valerie Strauch and me needs to be enrolled in the Pull Program, except for Lisa Linn. You can take her off the list as driving isn't one of her job responsibilities.

From: Lance Sandman
Sent: Tuesday, October 02, 2012 4:52 PM
To: Jaclyn Schwerdt
Subject: RE: EPN and ADP Portal

The email Defendant loves at beginning now comes back to haunt them.

Hi Jaclyn,

I am not planning to drive in the course of my duties at this time. If and when this situation changes, I understand that I can or should enroll at that time.

Best regards,

Lance W. Sandman, AMS[®], CCAM[®], CMCA[®]

DRIVER RECORD INFORMATION

DRIVERS LICENCE OR ID CARD #	F.O. BATES NO.	TYPE APP. DATE	MISC. INFO. SUBMITTED BY REQUESTOR	REQ CODE	RECORD DATE
N9981975				BQ211	042913



IDENTIFICATION OF DRIVER BASED
ON INFORMATION SUBMITTED

01605 SANDMAN, LANCE W

BIRTHDATE	SEX	HEIGHT	WEIGHT	EYES	HAIR	DMV USE ONLY	
061463	M	510	195	BLUE	BLOND	CL NOT 04/29	BLK PUL

DRIVER LICENSE INFORMATION

CLASS	ISSUED	EXPIRES	EXT	RESTRICTIONS	DUP LIC ISSUED	LIC HELD	
C N-COM	011211	061415		01			1815

ITEM	VIOLATION OR ACC. DATE	CONVICTION DATE	SECTION(S) VIOLATED LOCATION OR ACCIDENT OR OUT-OF-STATE VIOLATION	STATUTE	COURT DISPOSITION			DOCKET CITATION OR FR FILE NUMBER	LOCATION OF COURT OR ACCIDENT REPORT NUMBER	VEHICLE LICENSE
					TYPE	JAIL OR CYA	AMT.			
ABST	080407	090607	23152B DMV POINT COUNT 2	VC				704829	19496 SAN FERNANDO	5NGJ577

M I S C	ANY ACCIDENTS SHOWN ABOVE DO NOT NECESSARILY INDICATE DRIVER RESPONSIBILITY.
	*NOTIFICATION OF ACTIVITY PER REQUEST SUBJECT ISSUED ID CARD 12/30/10 EXPIRES 06/14/16 REST 01- MUST WEAR CORRECTIVE LENSES WHEN DRIVING.

MERIT PM LLC
JACLYN SCHWERDT
1 POLARIS WY STE 100
ALISO VIEJO CA 92656

DEPARTMENT ACTION	MAIL ORDER DATE	EFFECTIVE DATE	AUTHORITY SECTION(S) OR OTHER STATE TAKING ACTION	THRU DATE OR TERM	REASON FOR ACTION	SERVICE OF ORDER		FR FILE NUMBER
						TYPE	DATE	
SUSPENDED	092707	090607	13352A1			A	092707	
PRIV REIN		030808	13352					
ACTN TERM		030311	16480A2					

BEVERLY PETTY OF FSR



**MR. SANDMAN, BACK IN 2012, SHOULD
HAVE BEEN IN THE PULL PROGRAM; RIGHT?**

YES. SHE MISSED IT.

SOMEBODY DROPPED THE BALL; RIGHT?

YES.

ABOUT THE SPECIAL VERDICT FORM

COMPARATIVE FAULT PERCENTAGES

PARAMEDICS AND TRIAGE NURSE



EMS REPORT

D-C-2	Date	Inc #	Jur Sta	PD Unit #	<input type="checkbox"/> No Pt <input type="checkbox"/> Cx at Scene <input type="checkbox"/> Pu Asst <input type="checkbox"/> DOA <input type="checkbox"/> Pronc'd by Base <input type="checkbox"/> IFT <input checked="" type="checkbox"/> Pg 2	PATIENT ASSESSMENT
	03/17/2013	16654	31			Pt <u>2</u> of <u>4</u> # Pts <u>1</u> Transported
Inc	E. Bayno 210 Fwy @ Colorado Blvd				PA 911 PKI	Orig. Seq. #

GCS/mLAPSS	
Time	1909 / 1930
Eyes	4 / 4
Motor	6 / 6
Verbal	5 / 5
GCS Total	15 / 15
<input type="checkbox"/> Normal for pt / Age	

LANCE SANDMAN WAS NOT SHOWING SIGNS OF SERIOUS INTOXICATION

- **ABLE TO ANSWER QUESTIONS/ORIENTED TO TIME AND PLACE**
- **KNEW WHAT WAS GOING ON**
- **NO SLURRED SPEECH, DELAYED SPEECH, OR STUDDERING SPEECH**
- **NO UNUSUAL EMOTIONAL BEHAVIOR**
- **PASSED A GRIP TEST AND NEUROLOGICAL ASSESSEMENT**
- **NO PROBLEMS WITH HIS FACE OR ABILITY TO SMILE**
- **NO PROBLEMS STAYING AWAKE/ NO LOSS OF CONCIOUSNESS**
- **NOT DIZZY/NOT VOMITTING**
- **NO SIGNS OF SERIOUS INTOXICATION**

DR. DONALD BARCELOUX

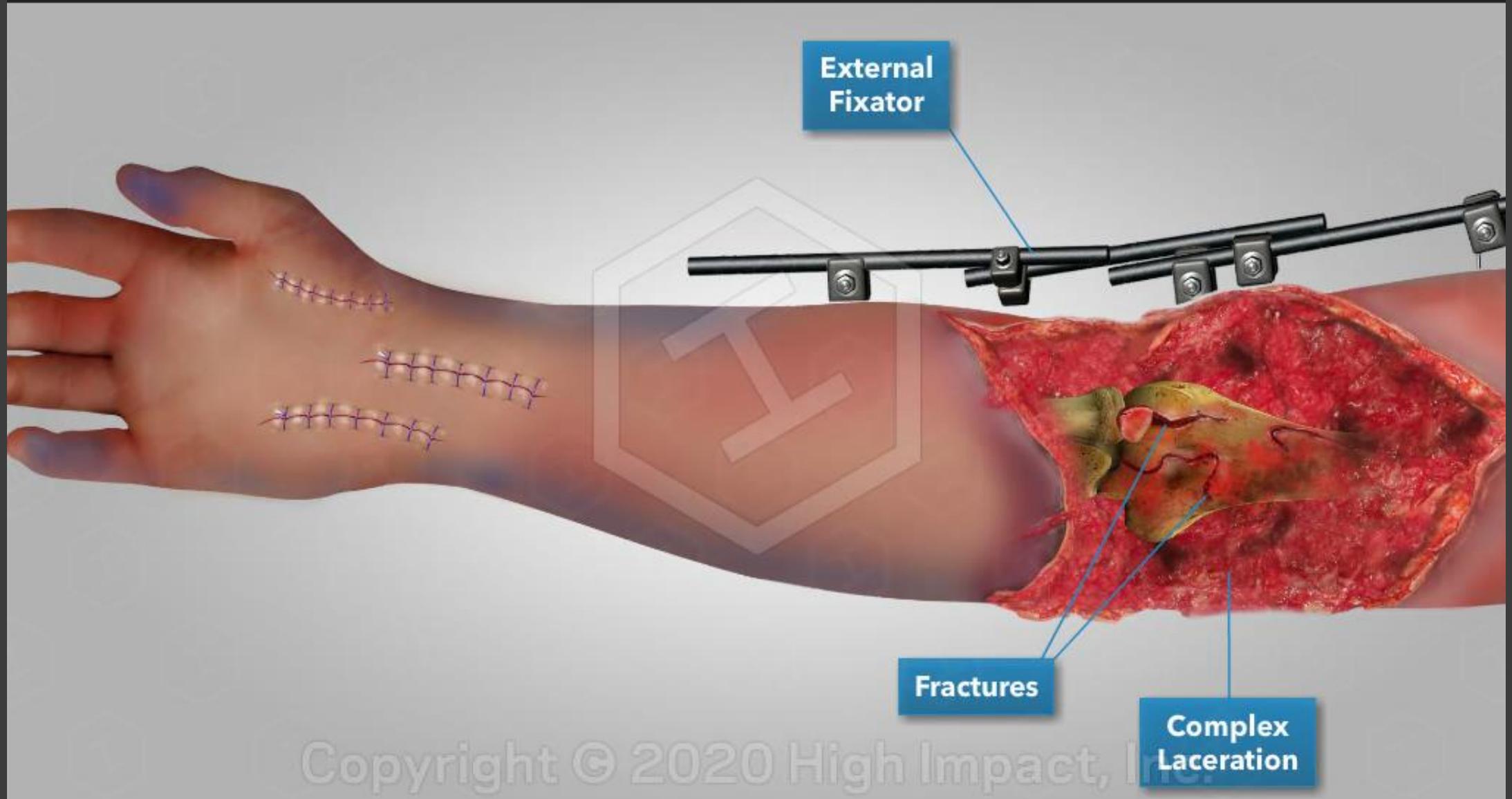


DAMAGES









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LOSS OF EARNINGS

**TOM GEORGE
EMPLOYMENT DATA**

EARNINGS HISTORY:

YEAR	EARNINGS
2008	\$165,343
2009	\$154,832
2010	\$154,839
2011	\$155,515
2012	\$179,907
2013	\$111,456
2014	\$190,553
2015	\$182,347
2016	\$188,576

KEY CONCEPTS

- **TRANSFER TO MICHIGAN/DEMOTION**
- **NEW JOB RESPONSIBILITIES**
- **THE TOLL ON BODY AND MIND BACK AT WORK**
- **NOT SUSTAINABLE**
- **PAIN AND MORE SURGERIES**
- **ON THIN ICE**
- **SHORTENED CAREER TRAJECTORY/WORK LIFE**
- **DEFENSE EXPERT'S TOO NARROW FOCUS**

CONCLUSION

**GREENE BROILLET
& WHEELER LLP**

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- **ALAN VAN GELDER:**
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